**PRIVACY POLICY, PERSONAL DATA PROTECTION AND COOKIE FILE POLICY**

Date of implementation: 1 December 2019

**1.Introduction and applicability of this policy**

* 1. This Privacy Policy describes how we collect, use and disclose your information and what rights you have regarding this information.

Using our products, you are invited to agree to this Policy and the conditions for the manipulation of your data, including your personal data in the manner specified in this Policy.

By registering and using our products, the user expresses his agreement to the data processing conditions set forth in this Policy.

 1.2. We strive to make the privacy policy more accessible and understandable, for this we:

 • make the sections listed below in the Contents,

 • give examples that will help to illustrate how we implement this Policy,

 • highlight in capital letters terms that are used more than once.

 1.3. This Privacy Policy applies to our Portal, websites (“**Sites**”), games (“**Games**”), mobile applications, user account (“**Account**”) and other official related products, sites, messages and services (including support service, forums), which we collectively call “**Products**”, with the exception of products offered in accordance with another privacy policy or services provided by third parties.

**2. Company profile**

2.1. In this document, “Company”, “we”, “we”, “our” and “our” - depending on the Portal's capabilities, refer to (a) LTD MOZGO, registered at OMIROU / 10, Limassol, Cyprus, 3095, (b) LLC Quiz Mozgoboynya, PSRN: 1196658059938, registered at: Russia, Sverdlovsk Region, Yekaterinburg, ul. Malysheva, d. 71, of. 505.

In accordance with the General Data Protection Regulation (GDPR) and other data protection laws in the Member States of the European Union, the Company is a Data Controller.

**3. Contents**

1. Introduction and applicability of this policy

2. Company profile

3. The content

4. The data we collect and receive

5. The purpose of data use

6. To whom do we transmit the data

7. Cross-border data transfer

8. Data storage

9. Data Security

10. Age restrictions

11. Your rights

12. How to contact us

13. Policy Change

**4. Data we collect and receive**

4.1. To provide the right to use our Products on the basis of a contract with the user, we may collect or receive data that may include information voluntarily provided during the filling out of special forms, information provided during registration, ordering Products, publishing materials or requesting the provision of other services or information collected automatically during the use of the Portal.

**4.2 Data you provide to us**

**4.2.1. Account Information**

To register or update your account, you may be asked to provide your details, including among other matters, your username (nickname), email address, phone number, password.

**4.2.2. Communication data and content**

When you contact us or report problems with the Portal, publish any content, materials, messages or provide any other information, we can process all this information. This information may include:

• data that you publish, comment on or like in any section of the Portal;

• data that you provide through our support channels;

• when you make a payment, we receive the information necessary to process your orders, which may include the transaction amount, but does not include financial information or bank card holder data that will be transmitted directly to the payment service provider using secure protocols; you can find more information in the current data protection policies about corresponding payment service providers. If you make payments in a mobile application, we do not collect and do not access your name and payment information, this information is collected and stored on your platform (Apple Store or Google Play) or the payment service provider of your platform.

• information about your profiles on social networking sites to ensure integration with such type of sites.

Please take into consideration that information you voluntarily publish (for example, on a forum) will be available for viewing by other users. We are not responsible for any information that you voluntarily decide to post publicly through such services or in a suchlike way.

**4.2.3. Anonymous data**

We also collect anonymous data about visitors and the use of our Portal in order to create statistics or reports. However, such data does not directly or indirectly relate to a concrete individual, an individual person cannot be identified from the anonymous data that we collect for these purposes.

**4.2.4. Special categories of personal data**

We do not process special categories of personal data regarding race, nationality, political views, religious or philosophical beliefs, state of health, intimate life, or criminal record data.

**4.2.5. Sign in using social networks and third-party resources**

In order to access some features of the Portal, you may be asked to log in using your social network account and / or third-party resources, for example, Google, Yandex, Facebook or Vkontakte. We do not have access to your account and password on such a resource and / or on a social network, since the login process is performed on the servers of the corresponding resource and / or social network. You enter your username and password being on the corresponding resource or on the social network site. You take the responsibility for the data protection of your account on the corresponding resource and / or in the social network and for any actions or actions on the corresponding resource and / or in your social network.

When you use the Portal through your account on the corresponding resource and / or social network, you will be asked to allow the Portal to access certain information stored on the corresponding resource and / or social network. We use your information from an account on the corresponding resource and / or on the social network only in accordance with your privacy settings that you have configured for your account on the corresponding resource and / or social network. Thus, we use this information only to provide you with the opportunity to use the Portal at the moment (but do not store) such information.

The use of personal data by the relevant resource and / or social network that you provide in connection with the use of the Portal is regulated by the privacy policy of the relevant resource and / or social network and is controlled by them, and not by this Privacy Policy or by us.

**4.2.6. Other data**

We may request other information necessary for organizing and conducting events via the Portal when you register to participate in such events.

**4.3. Data we collect automatically**

**4.3.1. Usage Data**

The browser or client program may transmit certain information about the details of visits to the Portal, including

• information about traffic, log files, information about user actions on the Portal;

• IP addresses and identifiers of mobile devices (for example, your device identifier, advertisement identifier, MAC address, Android identifier, IMEI);

• general data of your location that does not include information about the exact location;

• account authentication tokens so that the user does not need to log in again;

• account authentication tokens so that the user does not need to log in again;

• social network identifier;

• information about the browser and device, about the operating system;

• data of your use of the Portal, for example, your actions on the Portal and your interactions with other Users and / or Partners inside the Portal and other similar data.

**4.3.2. Cookie files and Similar Technologies**

To make our resources function correctly, we may use cookie files. Cookie files are small fragments of text information stored in memory that are automatically created and stored on your computer or other device to link and identify user activity (“Cookies”). Cookie files commonly do not include names and / or email addresses and / or other personal data. In fact, they usually contain anonymous information which is necessary for the improving of the Portal functionality.

Cookie files or similar technologies stored on your computer or device via which you use the Portal perform the following functions:

**Authentication.** If you log in to our resources, cookie files help us show you the right information and personalize your experience.

**Safety**. We use cookie-files to switch on and support our security features and to help us detect malicious activity.

**Preferences and settings**. Cookie files or similar technologies can tell us which language you prefer and what your communication preferences are. They will help you to fill out forms on our resources more easily and also provide you with functionality and personalized settings.

**Marketing.** We may use cookie files or similar technologies to carry out marketing campaigns and track their effectiveness. Similarly, our partners can use cookie files to provide us with information about your interactions with their services and action tags to measure advertising effectiveness and to ensure more targeted advertising. The use of these third-party cookie files will be subject to the privacy policies of advertising service providers.

**Efficiency, analytics and research.**

Cookie files or similar technologies help us find out how well our resources work. We can also use cookie files or similar technologies to understand, improve and research products, functions and services, including creating logs and records when accessing our sites and resources from different devices, such as your computer or mobile device.

We do not store cookies for more than one year.

We can use the services of third-party analytic software providers for better understanding of our software functionality on the device, including, but not limited to, Google Analytics, Google AdWords, Yandex.Metrica, Firebase, Facebook Analytica, AppsFlyer (collectively called “**Third-party analytic services** "). This software may record information about how often you use the Portal; events that happen on the Portal, aggregated data on use and efficiency; information about where our software was downloaded from. These partners may use cookie files, web beacons and other tracking technologies to collect or import data about you and may act as a data operator regarding information about you. We do not associate the information that we store in the analytical software with the personal information that you send to us.

This policy does not cover the use of third-party tools, to learn more about their privacy policy and the possibilities of refusing to display ads, follow the links below:

**AppMetrica**

We use AppMetrica for better understanding of how you use our products. For more information on AppMetrica privacy practices

see https://yandex.com/legal/metrica\_termsofuse.

Find out more in their Terms of Service and Privacy Policy. Refusal of processing: visit the Yandex page of Metrica.

**Facebook Analytics**

An analytics solution that helps you understand how you use our products. For more information on Facebook Analytics privacy practices

see https://www.facebook.com/full\_data\_use\_policy.

**Firebase**

Firebase helps us clearly understand how users behave. That helps us to make reasonable decisions about software application marketing and performance optimization. For more information on Firebase Security Policies

see https://firebase.google.com/terms/analytics.

**Google Analytics**

Google Analytics collects information about how often users visit our site, what pages they visit, when they do it, and what other sites they visited before coming to our site. Google’s capability to use and share information collected by Google Analytics about your visits to our resources is limited by the Google Analytics Terms of Service and Google’s Privacy Policy. You can prevent Google Analytics from recognizing you when you return to our site by disabling cookie files on your browser or mobile device.

 For more information about Google Analytics, see the Google Privacy Policy (https://policies.google.com/privacy?hl=en). To prevent Google Analytics from using your data through a web browser, you can install the Google Analytics blocker to refuse access (<https://tools.google.com/dlpage/gaoptout/>).

**Google AdWords (Marketing Cookie files)**

Our site uses the Google AdWords Conversion Tracking cookie files to measure and optimize the performance and user experience associated with our Google search ads or selected sites on the Google Display Network. Learn more about Google’s privacy policy here.

*To refuse the processing of data*: visit your Google settings.

You can **manage** cookie files or delete them at your discretion by changing your browser settings. You can also delete all cookie files that are already on your computer, and configure most browsers not to place cookie files. However, if you do this, you will have to manually enter some settings each time you visit the site, and some services and functions may not work.

**5. Purpose of data use**

**5.1. Provide you our products**

In order to provide you with the opportunity to use our products on the basis of a bilateral agreement, we use your information, which is necessary for the purposes of:

• registration and administration of your account, as well verification of your data,

• enabling you to use our products;

• verification and confirmation of payments;

• keeping contact with you, including by email or via push notifications about your account or transactions, and send you information about the features of our Services or changes to our policies;

• providing support, including but not limited to product updates, bug fixes, and other similar messages;

• organization of your participation in competitions, rewarding you with gifts and awards, to which you can be eligible as a result of winning an online or offline competition, etc.

**5.2. Make products convenient for our users**

**5.2.1. To provide a quality product to our users, we can:**

• update and develop User profiles;

• develop and improve products;

• manage our relationship with you;

• provide social functions within the product;

• set the settings in accordance with your wishes;

• respond to your comments and questions, and provide technical support;

• notify and provide information, including by e-mail or via push notifications, about the features of our products, about releases of new products and about new developments, as well as advertise our products and services;

• notify about special offers in our products, as well as offers from other websites and services, including by e-mail;

• send information, including by e-mail or via push notifications, for example, security alerts and support messages;

• provide the ability to communicate with other Users.

You can refuse from receiving our advertising messages. To learn how to do this, please refer to section 11.7. "The right to refuse data processing."

**5.3. Ensure safety and fairness**

5.3.1. In order to ensure safety and fairness within our products and their social functions, to prevent violations and to combat fraud and deception, and to ensure acceptable use, we can:

• analyze and control the use of the Services;

• take measures against illegal, fraudulent or non-licensing actions of Users.

5.3.2. If the data can be used to prove fraud, fraudulent activity, or a violation of the License Agreement, we will continue to store data to establish a violation, to exercise or to protect our rights, include claims, during the applicable limitation period or otherwise term established by law.

**5.4. Processing data with your consent**

5.4.1. With your consent, we may process your data for additional specific purposes.

5.4.2. If you have agreed to our use of information about you for a specific purpose, you can withdraw your consent at any time (to find out what to do in this case, see Section 11.9.), But this will not affect the processing of data that has already taken place. However, in some cases this may mean that you can no longer use the products.

**5.5. Data processing basis (for users from the European Union).**

 Our basis for the processing of your data will depend on the purpose for which we use your personal data. Typically, we will rely on the following legal grounds to process your personal information: (i) to fulfill a contract with you (for example, to provide you with our Products); (ii) based on our legitimate interests; (iii) to perform our duties in accordance with the requirements of the law; or (iv) in individual cases based on your consent.

**6. To whom do we transmit the data**

6.1. We exchange information that we collect about you in the ways described below only in cases where it is necessary to fulfill an agreement with you, to comply with the legal obligations that we must fulfill (in relation to users from the European Union) based on our legal interests or based on your consent. We do not sell information about you to advertisers or third parties.

**6.1.1. Payment services**: we provide your email address, IP address, information about your purchases and other information that you provide to us to fulfill your requests for payment. Financial information or bank card holder data is provided directly by you to a payment service provider using secure protocols. If you make payments in a mobile application, this information is collected directly and stored by your platform (Apple Store or Google Play) or your platform’s payment service provider.

**6.1.2. Hosting providers:** we can use third-party companies to post information or provide other infrastructure that helps to provide our products to you.

**6.1.3. Customer support services:** we can engage third parties to provide customer support for specific territories and products. Such companies may have access to your data, including data that you provide in your technical support requests.

**6.1.4. External moderators and testers**: some limited data about you (for example, your nickname, IP address) may be available to third-party administrators, moderators and testers that help you provide better services, for example, to quickly answer your questions.

**6.1.5. Software developers**: for the development and support of software, we can share your nickname, email, IP address and some other information with the companies that develop our products.

**6.1.6. Marketing partners**: we can provide your email, nickname, IP address and other information that you provide to us to facilitate the targeting, delivery and measurement of online advertising using third-party services or otherwise facilitate the transfer of information that may be useful or interesting to you. See Section 4.3.2 for more information. of this privacy policy.

**6.1.7. Links to third-party sites.** Our resources may contain links that direct you to third-party sites or services whose privacy policies may differ from ours. If you provide information on any of the third-party sites, your information is governed by a third-party privacy policy. We recommend that you carefully read the privacy policy of any third-party resource that you visit.

**6.1.8. Sharing anonymous information**: we can also exchange anonymous or aggregated information with third parties, or other data that does not directly identify you and that cannot be used to identify any individual user, for example, to show trends in the use of our products. We can also allow our third-party advertisers to collect anonymous information and aggregated information in products, and they can then share this information with us. Our advertisers can collect this information using tracking technologies such as cookie files and web beacons. This allows our advertisers to develop and place targeted advertising on our products and on third-party websites so that they can provide you with advertisements about products and services that will be interesting for you. Advertisers will also use this information to monitor, improve or modify their services.

**6.1.9. Publicly Available Information:** Our resources may offer publicly available chats, forums, and blogs that can be viewed by third parties. Please note that you are posting publicly available information at your own peril and risk. 6.1.9. Publicly Available Information: Our resources may offer publicly available chats, forums, and blogs that can be viewed by third parties. Please note that you are posting publicly

information at your own peril and risk. We are not responsible for any information that you voluntarily select for publication. You should know that any information that you provide on these communication services, including account information, can be read, collected and used by any user who uses these services. Your messages and certain account information may remain even after the termination of your account. We strongly recommend that you consider the sensitivity of any information you enter into these services. To request removal of your information from publicly accessible resources that we manage, contact us as described below in the “How to Contact Us” section. If in some cases we are not able to delete your information, in this case we will inform you of this and the reasons for the inability to delete the information.

**6.1.10. Change of control**: we can transfer your data in the case we sale our company, in the case of merger or change in the company control or in preparation for any of these considerations. Any person who acquires our company or part of our business will have the right to continue to use your data, strictly in accordance with this Privacy Policy, unless otherwise is agreed with you.

**7. Cross-border data transfer**

7.1. Our products are globally distributed, so your data can be transferred anywhere in the world to fulfill an agreement with you. Your data may be transferred to partners located in countries that do not adequately protect the rights of personal data subjects. Whenever we transfer your information, we take measures to protect it in accordance with the terms of this policy and the requirements of current legislation, in particular, by including special conditions in contracts with our partners.

**8. Data storage**

8.1. We store your data as long as your account is active, or as long as it is necessary to enable you to use our products. We can periodically identify unused accounts, and we regularly check and delete unnecessary data.

Please note that if you ask us to delete your personal data, we can save it if it is necessary to protect our legitimate business interests, for example, to fulfill our obligations, resolve disputes and ensure compliance with our agreements.

**8.2. Content that you upload to our resources:** if your account is deleted or blocked, some of your information and the content that you provide will remain in order to allow other users to fully use our products. For example, your published messages and content will continue to be displayed.

**8.3. Marketing information**. If you choose to receive marketing communications from us, we will store information about your marketing preferences for a reasonable period of time from the moment you last showed interest in our products. We store information obtained from cookie files and other tracking technologies for a reasonable period of time from the receipt of such information.

**9. Security guarantees**

9.1. To ensure the safe use of our products, we constantly develop and implement administrative, technical and physical security measures to protect your data from unauthorized access or from loss, misuse or alteration.

**10. Age restrictions**

10.1. We intentionally do not collect or request personal data from children under the age of 13 years or intentionally do not allow such persons to use our products. If you are under 13, please do not send us information about yourself, including your name, address, phone number or email address. No one under the age of 13 may provide any personal data without the consent of their parents or legal representatives.

**11. Your rights**

11.1. You have certain rights with respect to your personal data. The following is a brief overview of these rights, their use and possible limitations.

11.2. You have the right to access your personal data, object to our use of your information (including for marketing purposes), request the deletion or restriction of your information, or request your data in a structured format. Below we describe the execution order of such queries. You can contact us as described below in the Contact Us section to send a request.

11.3. Your requests may be limited in some cases, for example, when your request concerns the disclosure of information about another person, or if you ask to delete information that we have the right to process in accordance with the provisions of the law, regardless of your consent.

11.4. **The right to access personal data**: at your discretion, you can send us a request for information about your personal data that we process. Information for the processed data is provided to users from the Russian Federation on the basis of a written request sent to the address specified in clause 12.1. Politicians. The request must contain the number of the main document proving the identity of the subject of personal data or his representative, information about the date of issue of the said document and the authority that issued it, nickname, signature of the subject of personal data or his representative, other information necessary to identify the user.

**11.5. The right to change or clarify personal data**: if it is available, you can edit some of your personal data (for example, email address) inside your account. You can also ask us to change, update or clarify your data in case they are incomplete, outdated, inaccurate.

**11.6. The right to delete data**. We act in accordance with the principles of processing data on GDPR, including respecting the User’s right to oblivion. In certain territories (including the European Union), you can ask us to completely or partially delete your personal data (for example, if you no longer use our products). As a result of deleting your account, you will lose access to most services, including account information and other data, related to the account, subscriptions to forums and the ability to access other resources for which you use the account.

**11.7. The right to refuse from data processing:** we act on the basis of the principles of accuracy and voluntary provision of information. In certain areas (including the European Union), where the processing of your personal data is based on the legitimate interests of the company, you can exercise your right to refuse processing. If you refuse to process, we will no longer process your personal data if there are no convincing and prevailing legal grounds for processing, and if the data is not used to protect our legal rights and interests.

**Opt out of direct marketing:**

You may opt out of receiving any direct marketing communications that we may send to you. You can use the unsubscribe mechanism in messages, you can also turn off push notifications by visiting the settings on your device and selecting the appropriate setting. To opt out of interest-based advertising in mobile apps, please check the privacy settings of your Android or iOS device and select

Restrict Ad Tracking (Apple iOS) or Opt Out of Interest-Based Ads (Android).

To change or delete push notifications, go to the settings section of your device and select the appropriate option or change the settings in your browser if you access any of our sites.

You can also refuse to use our information for marketing purposes by contacting us in accordance with the "Contacting Us" section. When you make such requests, it may take us time to examine and fulfill your request. Even after you refuse to receive advertising messages from us, you will continue to receive transaction messages about our products.

**11.8. For European Union users only: Right to data transfer**. Data transfer is the ability to receive some of your personal data in a format that you can transfer from one service provider to another (for example, when transferring an email address to another service provider). Depending on the context, this applies to some, but not all of your data.

**11.9. You can withdraw consent to the processing of data** when the processing of your personal data is based on consent by contacting us as described in the "How to Contact Us" section. If you refuse your consent, this will not affect the legality of the processing based on your consent until it is revoked.

**11.10.** In accordance with the rules of the current legislation, we may require you to provide additional information for the purposes of fulfilling your request. In most cases, we will fulfill your request within one calendar month, provided you have all the required information. If we cannot fully satisfy your request within a calendar month (due to the complexity or number of requests), we can extend this period for another two calendar months, if this does not contradict the current legislation. If an extension is necessary, we will explain the reasons for this delay. If you make your request electronically, we will, if possible, provide the relevant information electronically, unless you require otherwise.

**12. How to contact us**

12.1. If you have any questions about how your personal data is collected, stored, used or processed in any other way, or if you want to exercise any of your rights in relation to data, please contact us at:

LLC Quiz Mozgoboynya,

Mailing address: Russia, Sverdlovsk Region, Yekaterinburg, ul. Malysheva, d. 71, of. 505

Email Address: legal@mozgo.com

**13. Policy Changes**

13.1. From time to time, we may make changes to this privacy policy. Any changes to the privacy policy will be published on this page and, if the changes are significant, we will either give you a notification inside your account or send a notification by e-mail. We recommend that you review this Policy when you use our products to keep abreast of our Policy regarding data and ways to protect your privacy.