

PRIVACY POLICY

for mobile application "CarDamageTest"

1. DEFINITIONS USED

"Mobile application" is software (with all existing additions and improvements) designed to run on smartphones, tablets, watches and other mobile devices, and developed for a specific platform (iOS, Android, Windows Phone, etc.). For the purposes of this Policy, Mobile Application means the following software: **CarDamageTest**.

"Personal data" means a set of personal data and/or non-personalized information about the User, provided by him to the Copyright Holder and/or automatically collected by the Copyright Holder and/or third parties.

"Policy" means this Mobile Application Privacy Policy (with all existing additions and changes).

"User" means a legal or natural person who has downloaded the Mobile Application to a smartphone, tablet, watch or any other mobile device and/or activated such Mobile Application on one of these devices.

"Owner" means the following person who owns the exclusive rights to own the Mobile Application: FINOLAB LTD, www.finolab.ai.

"Cookies" means small files sent to any mobile application or site and placed on the User's smartphones, tablets, watches and other mobile devices to improve the operation of such applications or sites, as well as the quality of the content placed in them.

2. RELATIONSHIPS TO WHICH THE POLICY APPLYS

General provisions

This Policy is used and applicable solely to Personal and other data received from the User in connection with his use of the Mobile Application and any updates or additions to it. The provisions of this Policy are aimed at:

- (1) determination of the types and types of data received, directions and purposes of use (processing) of Personal data, as well as sources of obtaining such Personal data; and
- (2) determining the rights of the User in relation to the protection of the confidentiality of the data transmitted by him; and
- (3) identification of persons responsible for the processing and storage of data, as well as third parties to whom such data is disclosed (in whole or in part).

The rules of this Policy do not apply in the case of processing by third parties of data that is voluntarily provided by the User.

By installing and/or activating the Mobile Application on a smartphone, tablet, watch or other mobile device, the User agrees to the terms of this Policy and gives his consent to the Copyright Holder for the collection, processing, retention and storage of Personal and other data in the manner and under the conditions provided for in this Policy .

If the User does not agree with the terms of the Policy and / or individual terms of the Policy are not clear to him, in this case the User is obliged to immediately stop using the Mobile Application.

User rights for the protection of personal data

In connection with the provision of Personal Data, the User automatically receives the following rights:

- (1) receive data relating to their processing (grounds and purposes of such processing, methods of processing used, information about persons who have access to them or to whom they can be disclosed on the basis of an agreement or the Law).
- (2) to receive data on the location and identification data of persons performing the processing and / or storage of Personal Data.
- (3) receive data on the retention periods of Personal Data.
- (4) to receive information about the completed or proposed cross-border transfer of Personal Data.
- (5) appeal against the actions or inaction of the Copyright Holder to the authorized body for the protection of the rights of personal data subjects or in court.
- (6) Right to Correction/Deletion. If you discover errors in the Personal Data we process, you have the right to correct them accordingly. In addition, you have the right to supplement the data if they are not complete or delete them completely.
- (7) The right to withdraw your consent to the processing of Personal Data, if given.
- (8) receive compensation for losses and / or compensation for moral damages in a judicial proceeding as a result of violations of the User's rights to the protection and protection of his Personal Data committed by the Copyright Holder and / or third parties.
- (9) to exercise other rights in the field of personal data protection provided for by the Law or the provisions of this Policy.

3. LIST OF PERSONAL DATA COLLECTED

Non-personally identifiable user information

In connection with the use of the Mobile Application, the Copyright Holder may automatically collect and process the following non-personalized information about the User:

- (1) information about traffic, the possible number of clicks made, logs and other data.
- (2) information about the device from which you are logging in: device ID, device type, operating system version, country, language, screen resolution, IP address.

Personal data about users

The Copyright Holder, for the purposes of using the Mobile Application by the Users, does not collect any personal data about the Users that allow him to be identified.

Use of cookies

This Mobile Application does not use certain Cookies to store any information about Users and the mobile devices they use.

Non-personalized information provided by Users for the purposes of using the Mobile Application

In connection with the use of the Mobile Application, the Copyright Holder receives from the User multimedia files (photos, videos) with the extension *.mpeg, *.mp4, *.jpeg, *.png with the image of vehicles

4. PURPOSE OF COLLECTING AND PROCESSING USER DATA

Determining the purposes of processing

The collection and processing of Personal Data is carried out for the following purposes:

- (1) for the implementation of the functionality of the Mobile Application, - providing Users with an analysis of damage to vehicles based on non-personalized information provided by Users.
- (2) to analyze the behavior of the User, as well as to identify the preferences of the User.
- (3) for the operational and correct operation of the Mobile Application, improving the operation of the Mobile Application, improving the content of the Mobile Application, improving the internal architecture and functionality of the Mobile Application.
- (4) to comply with the requirements of the Law.
- (5) for technical support of the Mobile application, identification of problems in its operation and their elimination.
- (6) to maintain communication with the User (communication).

(7) to fulfill other obligations of the Copyright Holder that arose before the User.

(7) for any other purpose, subject to obtaining separate consent from the User.

The processing of Personal Data is carried out on the basis of the following principles: (1) the lawfulness of the purposes and methods of processing; and (2) good faith; and (3) suitability of the purposes of the processing of Personal Data for the purposes predetermined and declared at the time of collection of such Personal Data; and (4) suitability of the scope and nature of the Personal Data being processed for the stated purposes of their processing.

Conditions for the processing of personal data

The processing of Personal Data is carried out in the following cases: (1) obtaining consent from the User; or (2) achievement by the Copyright Holder of the goals provided for by an international treaty or the Law; or (3) the provision by the User of his Personal Data to an unlimited circle of persons; or (4) fulfillment of other obligations of the Copyright Holder to the User, including, but not limited to, provision of certain content to the User; or (5) saving the life or health of the User when consent to the processing of his Personal Data cannot be obtained in advance.

In case of depersonalization of Personal Data, which does not allow to directly or indirectly identify the User, the subsequent use and disclosure of such data to third parties is allowed and the rules of this Policy are no longer applied to them.

The Right holder takes all possible measures to protect the confidentiality of the received Personal Data, except when the User has made such data publicly available.

The right holder collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes, destroys personal data. The processing of personal data is carried out in the following ways:

- manual processing of personal data;
- automated processing of personal data with the transfer of the received information via information and telecommunication networks "Internet" or without it;
- mixed processing of personal data.

The source of Personal Data is Users. The Copyright Holder does not collect information about the User, including Personal Data from third parties.

When processing data, the Right holder performs the following functions:

- takes measures necessary and sufficient to ensure compliance with the requirements of legislation in the field of personal data and local regulations of the Copyright Holder;
- takes legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying,

provision, distribution of personal data, as well as from other illegal actions in relation to personal data;

- communicates in the established manner to the subjects of personal data or their representatives information about the availability of personal data relating to the relevant subjects, provides an opportunity to get acquainted with these personal data when applying and (or) receiving requests from the specified subjects of personal data or their representatives, unless otherwise provided by law ;

- stops processing and destroys personal data in cases provided for by legislation in the field of personal data;

- performs other actions stipulated by the legislation in the field of personal data

5. THIRD PARTY ACCESS TO PERSONAL DATA

Use of analytical platforms

The Copyright Holder does not use analytical platforms such as Google Analytics, and others, including for tracking the frequency of site visits by Users; and (tracking the ways in which the User uses the Mobile Application and / or its content; and identifying the type and type of content that is popular among Users; and determining the location of the User, etc.

Disclosure of personal data to third parties

The Right holder has the right to disclose Personal Data (1) to its affiliates, branches and representative offices; (2) successors of the Copyright Holder, which arose as a result of its liquidation, reorganization or bankruptcy, and who received exclusive rights to own the Mobile Application; (3) to third parties solely for the purpose of providing the User with certain content or access to it; (4) to third parties when the User has given consent to the disclosure, transfer or processing of their Personal Data, as well as in other cases expressly provided for by the Law or this Policy.

The Right Holder discloses Personal Data only if (1) it is sure that third parties will comply with the terms of this Policy and take the same measures to protect the confidentiality of Personal Data that the Right Holder takes, and (2) consent to such disclosure has been previously expressed User and/or permitted by law.

6. ADVERTISING

Mobile App Advertising

The Copyright Holder does not place advertisements in the Mobile Application.

7. SENDING COMPLAINTS AND REQUESTS TO THE RIGHT HOLDER

Request to stop processing personal data

Each User has the right to express his objection to the Rightholder against the processing and / or storage of his Personal Data. Such an objection can be expressed as follows:

By email address: hello@finolab.ai, through the feedback form on the site finolab.ai.

Request for information about personal data

If the User has questions related to the procedure for applying or using this Policy, the procedure and / or method of processing Personal Data, the User can ask such a question as follows:

By email address: hello@finolab.ai, through the feedback form on the site finolab.ai.

Change (update, addition, correction) or deletion of personal data

The User has the right to change or delete Personal Data at any time by sending a special request to the Copyright Holder at the following address:

By email address: hello@finolab.ai, through the feedback form on the site finolab.ai.

The Right holder has the right to refuse to change or delete Personal Data if such actions will lead (1) to a violation of the rules of this Policy; or (2) in violation of the Law; (3) the nature of the Personal Data is evidence in any litigation that has arisen between the Copyright Holder and the User.

8. TERMS AND PROCEDURE FOR STORING PERSONAL DATA

Storage is carried out for the entire period necessary to achieve the stated purposes of processing Personal Data.

The Right holder undertakes to delete or depersonalize them immediately after achieving the goals of processing Personal Data.

9. PROTECTION OF PERSONAL DATA

Protecting the confidentiality of Personal Data is a paramount and important task for the Copyright Holder. The Right holder adheres to all required international standards, rules and recommendations for the protection of Personal Data.

The Right holder has implemented a number of technical and organizational methods aimed at protecting Personal Data from disclosure or unauthorized access by third parties. In addition, the Copyright Holder implements a policy of refusing to collect any non-anonymized Personal Data that allows the User to be identified as a specific individual.

10. FINAL PROVISIONS

Availability of policy text for review

Users can read the terms of this Policy: at the following link: finolab.ai

This version of the Policy is effective from September 13, 2022.

Changing and supplementing the policy

The right holder has the right to unilaterally make changes and additions to the terms of this Policy. The Copyright Holder does not bear any responsibility to the User for changing the terms of this Policy without the permission and / or consent of the User.

The user himself undertakes to regularly check the provisions of this Policy for possible changes or additions. The Copyright Holder has the right to notify Users by any of the available methods, including, but not limited to: pop-up notifications, pop-up window, placement of the relevant text on the main screen of the Application.

Disclosure risk

Regardless of the measures taken by the Copyright Holder to protect the confidentiality of the personal data received, the User is hereby considered to be properly aware that any transfer of Personal data on the Internet cannot be guaranteed secure, and therefore the User carries out such transfer at his own risk.