

# PRIVACY POLICY

## 1. Who We Are and What This Document Is About

1.1. We are Skoliolodzhik-Moscvva Limited Liability Company (the Scoliotic Company). You can contact us by e-mail [gusarova@scoliotic.ru](mailto:gusarova@scoliotic.ru) .

1.2. We developed this document to provide you with the important information regarding the personal data that we collect using the Scoliotic mobile app. Hereinafter we will call such mobile application the Application for brevity.

1.3. Purpose of this document is to explain what your personal data we use, how specifically we use it and why we need your personal data.

1.4. Here are the basic principles of how the Scoliotic Company considers the data privacy:

- to collect only the minimum amount of information, only what is necessary to launch the Application or protect our legitimate interests;
- to use the data only in connection with providing you with the opportunity to use the Application, receiving remuneration for the Application that we developed and protecting the rights and legitimate interests of the Scoliotic Company; you can find more detailed information on the legal grounds and ways of using your personal data in section 2 of this document;
- to be as transparent as possible about how we process your personal data;
- to collect any data only on the legal grounds.

## 2. Why We Need Your Information and What Kind of Information We Collect

2.1. We use your personal and non-personal information, both individually and collectively, in the following ways:

Collected information	When information is collected	Data collection purpose	Legal grounds for information processing
Information on payment details, namely: time of payment, time zone, selected tariff, unique identifier of the transaction	During registration, payment and every time you enter the Application.	Remuneration accounting, settlements reconciliation with the payment system	Processing is necessary to fulfill the contract with you and to protect our rights and legitimate interests.
Information collected by Firebase analytics, namely: session duration, OS, devices models, location, the Application launches, App update, purchases in the Application, transitions through screens in the Application.	When using the Application, in case of malfunctions of the Application.	Identification and elimination of errors in the Application operation.	Processing is necessary for realization of our rights and legitimate interests, namely: the Application operation improvement.
Information that you provide to our support service.	When you contact our support team.	We use this information to identify the problem you are experiencing and provide comprehensive feedback, including the problem solution, if applicable, as well	Processing is necessary to fulfill the contract with you

		as to study your opinion on our Application or our support team operation. We may also use this data to investigate any complaints on your behalf and to provide you with better services.	
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### 3. How We Protect Your Personal Information

We take various measures to protect the information we collect and process. These measures differ depending on sensitivity of the information we collect, process and store, and the current technology state. However, no security measure is 100% perfect. Therefore, while we strive to apply the reasonable measures to protect your information in accordance with its sensitivity, we cannot guarantee your information security and do not accept any responsibility for unauthorized use or access to your information under our control.

### 4. Terms of Storage

We may store the information for as long as we believe it may be necessary to resolve any disputes, ensure the observance of our agreements with you and enable you to use our products, protect our or your legal rights, and comply with technical and legal requirements and restrictions related to safety, integrity and performance of our products. Any information, which further storage does not allow to achieve any of the designated goals is subject to deletion (destruction).

### 5. Changes to Our Policy

We may update this policy from time to time. We will notify you on substantial changes by means of notification in the Application or through any other applicable communication channels before such changes come into effect.

### 6. Contact Us

If you have a complaint or question about this policy, if you would like to make a request regarding your personal data, you can contact us at any time at [gusarova@scoliologic.ru](mailto:gusarova@scoliologic.ru) . We will do our best to respond to you within the maximum of 15 business days upon your request receipt.

All the correspondence that we receive from you (written or electronic inquiries) shall be classified as the restricted access information and cannot be disclosed without your written consent. Personal data and your other information cannot be used without your consent for any purpose except to respond to a request, apart for the cases expressly provided by the legislation.