

## Privacy policy

IE Misikov M.G. (hereinafter referred to as the "Copyright Holder", "Us"), has great respect for the right to non-interference in privacy and pay great attention to the safety of the information provided to Us by users.

### 1. General Provisions.

1.1. This document "Privacy Policy" (hereinafter referred to as «Policy») contains methods for collecting and applying users information (hereinafter «User») by Copyright Holder when downloading, installing and using the Brite mobile application (hereinafter referred to as the Mobile Application).

1.2. By downloading, installing and using (hereinafter referred to as – «use») Mobile application, you fully agree with terms of this Policy.

1.3. This Policy is an integral part of the documents referring to it, including the License Agreement for Mobile Application.

1.4. Unless other is stated in this Policy, the terms and definitions used therein shall have the meaning set forth in the License Agreement of mobile app.

1.5. This Policy, including the interpretation of its provisions and the adoption procedure, execution, amendment and termination shall apply the Russian Federation law.

### 2. User Information

2.1. When You use the Mobile application or the Site, the Copyright Holder does not receive any user identification data (personal data).

2.2. The user's information in this Policy means:

2.2.1. Information that user provides about him/herself in registration or authorization process, as well as in the process of further use of service.

2.2.2. Depending on user's software settings data is transmitted automatically in anonymous form.

2.3. The Copyright Holder has the right to set requirements for the user information content, which must be provided to use the Service. If certain information is not marked as mandatory by the Copyright Holder, its provision or disclosure is carried out by user at its discretion.

2.4. In mobile application registration process, it is necessary to indicate: username / nickname, phone number.

Additionally, the User can specify: gender, age.

In mobile application registration/authorization process using social network authentication services such as Facebook, VKontakte, Odnoklassniki, Google, Instagram, Twitter, etc., user provides to Copyright Holder information which may include the following: username / nickname (can be automatically substituted from the corresponding authentication system), the identification number of the user in this authentication service, the subscriber's phone number, gender, age.

By the software of the Mobile application or the Site, number of the phone or the identification number of user is converted into a unique identifier of the User (token), which is transferred to

Copyright Holder. As a result, the phone and identification number of user are not transferred to the Copyright Holder and are not processed by Us.

2.5. Publicly available information. Depending on the functional features of the mobile application and/or custom user's settings, the profile data of the user may be available to an unlimited amount of Internet users and/or other users. The user gives informed consent to have an access to such data of their profile for unlimited number of persons. Due to user's account settings profile data becomes publicly available from the moment it is posted in mobile application independently by user or at user's request.

2.6. The Copyright Holder does not verify the accuracy of the information provided by user and user's consent to process the data in accordance with this Policy, believing that the user acts in good faith and makes all the necessary efforts to keep such information up to date and to obtain all the necessary consents of personal data.

2.7. The User is aware and accepts the possibility of using software of the Mobile Application and Site by third-party, as a result of which the Copyright Holder and third-party can receive and transmit anonymised personal data.

2.8. These third-party software include analytical systems such as following: Google Analytics, Yandex.Metrica, Firebase Performance monitoring, Facebook Analytics, App Analytics - App Store (Apple), Amplitude, Localytics, Appsee, AppsFlyer etc.

2.9. The composition and terms of collecting anonymised data by third-party software is determined directly by its respective owners and may include:

- ☐ browser data (type, version, cookie);
- ☐ devices and its location data;
- ☐ operating system data (type, version, screen resolution);
- ☐ request data (time, referral source, IP address).

2.10. Impersonal data received in automatic mode (Clause 2.2.2) are processed separately from the data provided by the user (Clause 2.2.1).

### 3. Purpose of processing User information

3.1. The Copyright Holder has the right to use the information of user for the following purposes:

3.1.1. Conclusion of usage Mobile Application Agreement. Conclusion of the Agreement, ordering the license for extended version are carried out remotely through the exchange of electronic documents that are signed by a simple electronic signature. In this case, the role of the key of the simple electronic signature of the User is performed by the token created on the side of the User from the subscriber number of the phone or the identification number of the User in the authentication service.

3.1.2. Identification of user in the framework of obligations performance under Agreement with him.

The user account is connect with token.

3.1.3. Fulfillment of obligations under Agreement, including providing user with access to mobile application and technical support, the use of the mobile application functionality.

In order to implement the relevant functionality of mobile application, site and service based on it, the Copyright Holder stores, organizes and displays the profiles of users containing the information provided by them.

3.1.4. Ensuring communication with user in order to provide information about service and quality improvements of mobile application under the concluded Agreement, including push-notifications involving third parties.

Communication with user is provided by mobile application software.

3.1.5. Conducting marketing, statistical and other research based on anonymised data in order to improve the quality of provided mobile application.

Data from the analytical systems (Clause 2.9.) is anonymous, collected and analyzed to improve mobile application quality.

3.1.6. Targeting advertising and/or informational materials using data from analytical systems (specified in Clause 2.9.).

### 4. User agreement to receive information

4.1. Within mobile application, We may send user push-notifications in order to provide information about mobile application updates, news; other messages related to the functionality of mobile application that may be important to user. At any moment user can disable these notifications by enabling custom settings on your device.

### 5. Transfer of user information

5.1. The Copyright Holder may transfer user's information to third parties in the following cases:

5.1.1. User express his/her consent to such actions, including the cases when user enable custom settings of mobile application, browser and other software, which removes the restriction on the provision of certain information;

5.1.2. The transfer is necessary in the framework of proper usage functionality of mobile application or site;

5.1.3. Attracting third parties to provide the Copyright Holder with information processing services in accordance with the objectives of user's information established by this Policy (analytical services, mailing services, etc.).

5.1.4. In case with transfer of all or part of the assets of Copyright Holder to third party ownership, including the assignment of rights under agreements concluded with user in favor of such third party;

5.1.5. At the request of the court or other legal authority within the procedure established by applicable law;

5.1.6. In order to protect the rights and legitimate interests of the Copyright Holder in connection with the violation of contracts concluded with user.

### 6. Requirements for the protection of user information

6.1. The Copyright Holder shall store user information and ensure its protection from unauthorized access and distribution in accordance with internal rules and regulations.

6.2. The user's personal information is kept confidential, with the exception of publicly available information (Clause 2.5) and other cases where the technology of providing service or software settings provide for open exchange of information with other participants and Internet users.

6.3. In order to improve the quality of the Service, the Copyright Holder has the right to keep log files about the actions performed by the User within the framework of using

the Service, as well as in connection with the conclusion and execution by user of contracts for 1 (One) year.

#### 7. Third Parties

7.1. Purchases. The Copyright Holder does not process payments and any information provided by user during the payment process. All user's billing information is proceeded by the Apple App Store payment system.

7.2. Social networks. On site and in mobile application there are elements (plug-ins, widgets) of social networks (for example, the Facebook "Like" and "Share" buttons). The person who submitted such items may collect information about your IP address, information about the pages user has visited.

7.3. Advertising. Advertisers providing this service in mobile application and/or on website may collect and use non-personally identifiable information, in particular, information about your activity in mobile application and / or on the Website, information about device identifier, IP address. They may use this information to present target advertisements. In addition, if user navigates through the advertising link and installs the application, the device identifier may be communicated to the advertiser in order to confirm the effectiveness of the advertisement.

7.4. References. The mobile application and/or site may contain links to third-party sites. If user open these links, he/she will leave site/mobile application and Copyright Holder is not responsible for the content and security of user data. These sites may have their own privacy policy defining the collection and storage of user data. This Policy does not apply to data provided, stored on, or used by third party websites. The user is advised, when entering a third party site, to review the privacy policy of such third party relating to the storage of its data.

7.5. Other users of the Service or the Internet. The Copyright Holder is not responsible for the use of user's information by third parties with whom he/she interacts within the framework of using the mobile application and/or site.

#### 8. Changing User's Information

8.1. The User may at any moment independently edit in personal account all information provided during registration or authorization.

#### 9. Changes to Privacy Policy

9.1. This Policy may be changed or terminated by the Copyright Holder unilaterally without notification of user.

It is recommended for user to regularly review this Policy.

9.2. The new edition of the Policy comes into force from the publication moment, unless other is stated by the new edition of the Policy.

9.3. The current version of the Policy is published on Copyright Holder's website in the Internet at [https://britetodo.com/privacy\\_policy.pdf](https://britetodo.com/privacy_policy.pdf)

If any questions regarding current Policy, please contact Us via [hello@britetodo.com](mailto:hello@britetodo.com)

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BIC of the Bank: 044525999

Date by 20th of November, 2020