

Personal Data Policy

This Personal Data Policy (hereinafter - the "**Policy**") defines the procedure for processing and protection of personal data of individuals using the website <https://uavprofsim.com/en/>.

1. Definitions

- 1.1. **Cookies** are small pieces of data sent by the Site server and stored on your device in order to optimise the performance of the Site. For the purposes of this Policy, the definition of Cookies also includes web beacons (pixel tags) and other similar technologies. The use of cookies on the Site is governed by the Cookie Policy [<https://uavprofsim.com/en/documents/>].
- 1.2. **Consent** means freely expressed, specific, substantive, informed, conscious, and unambiguously identifiable evidence of consent to the processing of personal data relating to the individual.
- 1.3. **Cross-border transfer of personal data** - transfer of personal data to the territory of a foreign country, to a foreign government authority, a foreign natural person, or a foreign legal entity.
- 1.4. **Personal data** mean any information relating to a directly or indirectly defined or identifiable natural person (subject of personal data). For example, personal data are surname, first name, patronymic, passport data, and e-mail address.
- 1.5. **Processing of personal data** means any action (operation) or set of actions (operations) performed with or without the use of automation means with personal data, including collection, recording, systematisation, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), anonymisation, blocking, deletion, destruction of personal data.
- 1.6. **Site** means Internet website on the following domain: <https://uavprofsim.com/en/>
- 1.7. **Site Owner** means STRATUS Limited Liability Company, BSRN: 1223900003800, TIN 3906412175, Address: 119607, Moscow, intra-urban territorial municipal district, Ramenskiy Boulevard, 1.
- 1.8. **Software** means [UAVProf Drone Simulator] professional flight simulation software for training of unmanned aerial vehicle (drone) operators using realistic simulations to recreate natural flight conditions.
- 1.9. **User** means any individual or entity in any state who uses or accesses the Site.

2. General Provisions

- 2.1. This Policy regulates the basic principles, purposes, conditions, and methods of processing personal data of the Site Users, as well as the composition of personal data processed on the Site, the functions of the Site Owner in the processing of personal data, the rights of personal data subjects, as well as the implemented measures of personal data protection.
- 2.2. This Policy applies only to personal data received from the User in connection with the use of the Site and/or Software distributed through the Site.
- 2.3. This Policy applies only to personal data received by the Site Owner and/or third parties in case they receive personal data from the Site Owner. The Policy does not apply to personal data received by third parties through the Site directly (for example, as a result of the use of third-party cookies).

- 2.4. By using the Site, inter alia, by providing his/her personal data for the registration or within further interaction with the Site Owner, the User unconditionally accepts the present Policy. If the User does not accept this Policy, the User must stop using the Site.

3. Purposes of personal data processing

Processing of information relating to the User of the Site and the Software, including their personal data, is carried out for the purposes of:

- 3.1. ensuring the technical functioning of the Site for the convenience of Users, personalisation of user experience on the site (for example, saving of the User's settings and authorisation status on the Site);
- 3.2. ensuring the functioning of the Site, including the possibility of registration of Users and purchase and payment by Users of the Software licence, performance of agreements with Users in relation to the Software, and other obligations of the Site Owner to Users as the right holder of the Software;
- 3.3. collection and analysis of statistical data on Users, status, preferences, and interests of Users related to the use of the Site and/or Software;
- 3.4. interaction with Users, in particular, collection of feedback, providing response to Users' requests, settlement of disputes, detection of errors, development and improvement of Site and Software;
- 3.5. the perfection of the rights of the User as a subject of personal data;
- 3.6. analyzing and improving the work of the Site and the Software, informing the Users about changes and new opportunities related to the use of the Site and Software, providing the Users with information, marketing and advertising materials, including personalised ones;
- 3.7. sending of individual messages of an advertising and marketing nature by e-mail upon the consent of the User, which can be changed or revoked by the User at any time;
- 3.8. compliance with the mandatory legislation requirements of the country of incorporation of the Site Owner.

4. Principles of Personal Data Processing

- 4.1. Legality: Processing of personal data is legal and fair. The legal basis for processing Users' personal data are:
 - 4.1.1. consent of the User as a subject of personal data;
 - 4.1.2. fulfilment of obligations to the User within the framework of the license agreement in respect of the Software, which can be concluded through the Site;
 - 4.1.3. requirements of the applicable law
- 4.2. Limitation of the processing of personal data to specific, predefined, and lawful purposes defined in this Policy.
- 4.3. Limit the scope and processing of personal data to the minimum amount necessary to achieve the purposes of processing.
- 4.4. Limitation of the period of retention of personal data to the minimum period necessary to achieve the purposes of processing personal data, and deletion of personal data in case of loss of necessity to achieve these purposes.

- 4.5. Ensuring the accuracy, sufficiency, and relevance of personal data, including taking necessary measures to delete or clarify inaccurate or incomplete personal data.
- 4.6. Ensuring the confidentiality of personal data and the application of all necessary technical and organisational measures for the protection of personal data.
- 4.7. Ensuring the security of personal data when stored, including the use of physical carriers of personal data in such a way as to ensure the security of personal data and prevent unauthorised access to them.
- 4.8. Ensuring the security of personal data transmission. The Site Owner shall not disclose, transmit or distribute User's personal data to third parties unless this is expressly provided by the User's consent and is not required by the law. The Site Owner may entrust the processing of personal data to another entity on the basis of a contract concluded with it only under the consent of the User. Such a contract will contain a list of actions (transactions) with personal data that will be performed by the entity processing personal data, the purpose of the processing, the obligation of such an entity to respect the confidentiality of personal data and to ensure the security of personal data in the processing thereof, and the requirements for the protection of the personal data.
- 4.9. Avoiding the consolidation of databases containing personal data processed for different, incompatible purposes, organisation of separate storage, and processing of such databases.

5. Types of processed User data

- 5.1. Depending on the ways the User uses the Site and the Software, various information of the User may be processed, including personal data.
- 5.2. The Site Owner automatically receives the following data when using the Site:
 - 5.2.1. standard data automatically received by the http-server when accessing the Site and subsequent actions of the User (IP address of the host, type of the User's operating system, pages of the Site visited by the User). Information containing the history of visiting the Site by the User;
 - 5.2.2. information automatically received when accessing the Site using bookmarks (cookies);
 - 5.2.3. information created by Users on the Site: comments, queries, and other information;
 - 5.2.4. coordinates determining the location of the User's device from which the Site is accessed (geolocation data).
- 5.3. Information and personal data received by the Site Owner when the User registers or fills in the feedback form:
 - 5.3.1. Surname, first name, patronymic (where applicable);
 - 5.3.2. Place of residence (country);
 - 5.3.3. Email address;
 - 5.3.4. Suggestions and feedback from the User.
- 5.4. Information and personal data received by the Site Owner when the User uses the Software:
 - 5.4.1. Data on the status of the Software usage: user sessions, the User's completion of individual elements of the Software (tracks, drone models, etc.), the User's achievement of the goals when using the Software, including successful completion of all mandatory stages/elements to obtain the relevant certificate.

- 5.5. The User is responsible for the completeness, correctness, and relevance of the data provided when using the Site.
- 5.6. The Site Owner does not process special categories of personal data, in particular information relating to race, nationality, political opinions, religious or philosophical beliefs, intimate life, or health status.
- 5.7. The Site Owner does not process the personal data of minors (under 18 years of age or other age depending on the jurisdiction) without the consent of their parents or legal representatives. Registration of underage Users on the Site is not allowed.

6. Advertising and Marketing Information

- 6.1. The Site Owner may place marketing and advertising information on the Site, including that of the third parties, as well as by placing banners and other links to third-party resources.
- 6.2. The Site Owner may send Users information, marketing or promotional messages related to the Site Owner's business and the Software that is sold through the Site, including notifications of new functionality of the Software available for purchase and/or download, other notifications related to the use of the Software.
- 6.3. The User agrees with the right of the Site Owner to send him such messages by displaying notifications in the User's Account on the Site, and/or sending them to the e-mail address indicated by the User when registering on the Site.
- 6.4. The User has the right to withdraw his/her consent to the sending of such messages to the e-mail address at any time by unchecking the appropriate box in the User's Account on the Site.
- 6.5. If the User refuses to receive marketing and advertising materials, the Site Owner reserves the right to send the User other notices of a non-advertising nature related to the use of the Site and/or the Software, including those related to the performance of the End-User Licence Agreement.

7. Access of Third Parties to Personal Data

- 7.1. The Site Owner may transfer Users' data to its partners subject to obtaining consent from Users, as well as in the absence of Users' direct consent - in cases provided for by law (for example, to payment service providers, without which it is impossible to fulfil obligations to the User to accept payment for the software licence).
- 7.2. The Site Owner may also provide the personal data of Users to:
 - 7.2.1. service providers of contractual assistance in licensing of software (e.g., fraud investigation, payment collection, consultants);
 - 7.2.2. law enforcement agencies, other government agencies, or third parties in response to a request for information in situations required by law, such as criminal investigations, other unlawful activity, or any activity that could subject the Site Owner or Users to liability.
- 7.3. Third parties may obtain User's data through the use of third-party cookies on the site, including but not limited to web analytics services. Details of the procedure and terms of such access are described in the Cookie Policy.
- 7.4. The Site may contain advertising banners or links to third-party websites. If the User clicks on such links, the User's personal data may be transferred to such third parties.

The Site Owner is not responsible for the ways and methods of processing User's data by third parties in this case.

8. Terms and Procedure for Processing and Storage of Personal Data

- 8.1. The Site Owner collects, stores, uses, transfers (disseminates, provides, accesses), anonymises, deletes, and destroys data. Mixed processing of personal data with transmission via the Internet is performed.
- 8.2. The personal data of Users are stored in the information systems of the Site Owner on servers in the territory of the country of incorporation of the Site Owner. If the User is a resident of a country other than the country of incorporation of the Site Owner, a cross-border transfer of personal data of the User to the servers of the Site in the country of incorporation of the Site Owner is performed. The Site Owner does not carry out cross-border transfer of the Users' data to other countries.
- 8.3. User's personal data are deleted as soon as the purpose of their processing is achieved or when it is no longer necessary to achieve this purpose. However, in some cases, the Site Owner may continue to store personal data for as long as required by applicable law and international agreements.

9. Procedure for Storage and Protection of Personal Data

- 9.1. The owner of the site takes technical, organisational, and legal measures to ensure the protection of the User's personal data from unlawful or accidental access, destruction, modification, blocking, copying, distribution, as well as from other unlawful actions.
- 9.2. In particular, in order to protect Users' data, the Site Owner may take the following measures:
 - 9.2.1. take legal, organisational, and technical measures to protect data from unlawful actions;
 - 9.2.2. provide unrestricted access to this Policy, as well as the possibility to communicate with the Site Owner through the feedback system;
 - 9.2.3. appoint a person responsible for the organisation of personal data processing, familiarise employees with the requirements of the legislation in the field of personal data protection, and conduct training of such employees;
 - 9.2.4. inform the individuals or their representatives about the processing of their personal data and provide an opportunity to familiarise themselves with these personal data, unless any restrictions are provided by the law applicable to the Site Owner;
 - 9.2.5. stop processing and delete personal data in cases provided for by the law.
- 9.3. The user's login and password are used to authorise access to the Site. The User is responsible for the safety of this information. The User has no right to transfer his/her own login and password to third parties and is obliged to take measures to ensure their confidentiality.
- 9.4. The Site Owner does not make decisions affecting the rights and legitimate interests of Users on the basis of exclusively automated processing of personal data, except for cases when information is provided as a result of a request made by the User using the Site interface or Software.

10. Rights of the User

The Site Owner guarantees the provision of the following rights to the User free of charge exclusively in relation to the personal data belonging to him/her:

- to correct the provided personal data if they are incomplete and (or) incorrect;
- to withdraw consent to the processing of personal data with subsequent deletion of personal data;
- to receive information regarding the processing of personal data;
- to restrict processing and delete personal data;

If the User believes that his/her rights and interests have been violated, he/she may submit a complaint to the Site Owner or apply to the relevant supervisory authority or court.

11. Communications with the Site Owner

11.1. The User may at any time send to the Site Owner an inquiry or complaint related to the use of his/her personal data to the e-mail address sim@uavprof.com or via the feedback form. In such a request, the User must indicate his/her contact details, by which the User and his/her Account on the Site can be identified (surname, first name, contact e-mail address).

11.2. The Site Owner will respond to User requests within 90 days from the date the request is made.

12. Final Provisions

12.1. The Site Owner may amend this Policy from time to time as part of improving the processing of personal data and the development of the Site. The new version of the Policy comes into force at the moment of its publication on the Site.

12.2. Users are notified about changes in the Policy at the next authorisation on the Site and will have to accept the terms of the new version of the Policy or stop using the Site.

12.3. The Site Owner retains access to previous versions of the Policy with their period of validity.