

Personal data handling policy

This Policy on the handling of personal data (hereinafter referred to as the "Policy") defines the procedure for processing and protecting the personal data of individuals using the site <https://uavprofsim.ru>

1. Terms

- 1.1. **Owner of the Site**– Limited Liability Company “STRATUS” OGRN: 1223900003800, INN 3906412175, Address: 236022, Kaliningrad region, Kaliningrad city, Sovetsky prospect, house 18, floor 1, room II.
- 1.2. **Processing of personal data**- processing of personal data - any action (operation) or set of actions (operations) performed with the use of automation tools or without the use of such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.
- 1.3. **Personal data**– any information related to a directly or indirectly defined or determinable natural person (subject of personal data). For example, personal data are the last name, first name, patronymic, passport data, e-mail address, telephone number.
- 1.4. **BY**- UAVPROF Drone Simulator – professional software for flight simulation (training of unmanned aerial vehicle (drone) operators using realistic simulations to recreate natural flight conditions).
- 1.5. **User**– any natural or legal person, located in any jurisdiction, who uses the Site or has access to it.
- 1.6. **Website**– A website on the Internet, located at: uavprofsim.ru
- 1.7. **Agreement**– freely expressed, specific, objective, informed, conscious and clearly identifiable evidence of consent to the processing of personal data relating to the subject.
- 1.8. **Cross-border transfer of personal data**- transfer of personal data to the territory of a foreign state to a foreign government body, a foreign individual or a foreign legal entity.
- 1.9. **Filescookies**- a small piece of data that is sent by the server Site and stored on your device for the purpose of optimizing the Site. For the purposes of this Policy, the definition of cookies includes web beacons (pixel tags) and other similar technologies. The use of cookies on the Site is governed by the Cookie Policy.

2. General Provisions

- 2.1. This Policy regulates the basic principles, purposes, conditions and methods of processing personal data of the Users of the Site, as well as the composition of personal data processed on the Site, the functions of the Site Owner in processing personal data, the rights of personal data subjects, as well as the measures implemented to protect personal data.

- 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 if they receive personal data from the Site Owner. The Policy does not apply to personal data received by third parties directly through the Site (for example, as a result of using third-party cookies).
- 2.4. By using the Site, including providing personal data at the registration stage or in the context of subsequent interaction with the Site Owner, the User expresses his/her unconditional consent to this Policy. In case of disagreement with the Policy, the User is obliged to stop using the Site.
- 2.5. This Policy has been developed in accordance with the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data" and the Federal Law of July 21, 2014 No. 242-FZ "On Amendments to Certain Legislative Acts of the Russian Federation in Terms of Clarifying the Procedure for Processing Personal Data in Information and Telecommunication Networks."

3. Purposes of personal data processing

Processing of information related to Users of the Site and 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, personalization of the user experience on the Site (for example, saving the settings made by the User and the authorization status on the Site);
- 3.2. ensuring the functioning of the Site, including the ability to register Users and purchase and pay for a license for the Software by Users, the execution of agreements with Users regarding the Software and other obligations of the Site Owner as the copyright holder of the Software to Users;
- 3.3. collection and analysis of statistical data about Users, status, preferences and interests of Users related to the use of the Site and/or Software;
- 3.4. interaction with Users, in particular, collecting feedback, providing support to Users and responding to their requests, resolving disputes, identifying errors in the operation of the Site, developing and improving the Site and software;
- 3.5. implementation of the rights of the User as a subject of personal data;
- 3.6. analysis and improvement of the operation of the Site and software, informing Users about changes and new opportunities related to the use of the Site and software, providing Users with information, marketing and advertising materials, including personalized ones;
- 3.7. sending individual messages of an advertising and marketing nature via e-mail, SMS, messages sent via Internet services of information dissemination organizers (for example, WhatsApp, Telegram) in the presence of the corresponding consent of the User, which can be changed or revoked by the User at any time;
- 3.8. compliance with mandatory requirements stipulated by the legislation of the country of registration of the Owner of the site.

4. Principles of personal data processing

- 4.1. Legality: the processing of personal data is carried out on a lawful and fair basis. The legal grounds for the processing of the User's personal data are:
 - 4.1.1. consent of the User as the subject of personal data;
 - 4.1.2. fulfillment of obligations to the User within the framework of the license agreement regarding the software, which may be concluded through the Site;
 - 4.1.3. requirements of applicable legislation.
- 4.2. Limiting the processing of personal data to specific, predetermined and legitimate purposes defined in this Policy.
- 4.3. Limiting the composition and volume of personal data processing to the minimum amount necessary to achieve the purpose of processing.
- 4.4. Limiting the storage period of personal data to the minimum period necessary to achieve the purpose of processing personal data, destruction of personal data in the event of loss of the need to achieve these purposes.
- 4.5. Ensuring the accuracy, sufficiency and relevance of personal data, including taking the necessary measures to delete or clarify inaccurate or incomplete personal data.
- 4.6. Ensuring the confidentiality of personal data, using all necessary technical and organizational measures to protect personal data. Access to the personal data of the User processed by the Owner of the Site is limited and is provided only to certain employees.
- 4.7. Ensuring the security of personal data during their storage, including the use of tangible media of personal data in such a way as to ensure the safety of personal data and prevent unauthorized access to them.
- 4.8. Ensuring the security of personal data during their transfer. The owner of the site does not disclose, transfer or distribute personal data of Users to third parties, unless this is expressly provided for by the consent of the User and does not follow from the requirements of the law. The owner of the site may entrust the processing of personal data to another person on the basis of an agreement concluded with this person solely with the consent of the user. Such an agreement will contain a list of actions (operations) with personal data that will be performed by the person processing the personal data, the purposes of processing, the obligation of such person to maintain the confidentiality of personal data and ensure the security of personal data during their processing, as well as requirements for the protection of processed personal data in accordance with Article 19 of the Federal Law "On Personal Data".
- 4.9. Preventing the unification of databases containing personal data, the processing of which is carried out for different, incompatible purposes, organizing the separate storage and processing of such databases.

5. Composition of processed information about Users

- 5.1. Depending on the methods by which the User uses the Site and the Software, various information of the User, including personal data, may be processed.
- 5.2. Information and personal data received by the Site Owner automatically 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 the User's visits to the Site;
 - 5.2.2. information automatically received when accessing the Site using bookmarks (cookies);
 - 5.2.3. information created by Users on the Site: comments, requests, 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 upon User registration or filling out the feedback form:
 - 5.3.1. Last name, first name, patronymic (where applicable);
 - 5.3.2. Place of residence (city, country);
 - 5.3.3. E-mail address;
 - 5.3.4. Telephone number, contact information in messengers;
 - 5.3.5. Information about the models of unmanned aerial vehicles (drones) that the User has or is interested in, the purposes of their use, and types of payloads;
 - 5.3.6. Information about the User's preferences regarding the method of using the Software, the operating system of the User's device on which the Software may be installed, the User's assessment of a reasonable cost of a Software license, the User's willingness to participate in pre-sales, willingness to act as a partner of the Site Owner in their region, and other marketing information related to the distribution of the Software.
 - 5.3.7. User suggestions and feedback.
- 5.4. Information and personal data received by the Site Owner during the execution of the license agreement with the User regarding the software concluded through the Site:
 - 5.4.1. Payment method;
 - 5.4.2. Credit card details/other payment method selected by the User;
 - 5.4.3. The User's membership in the number of persons authorized to use the Software on behalf of the legal entity-licensee.

The collection and processing of the User's data is carried out in this case solely for the purpose of making payments and ensuring the correct use of the Software by the licensee-legal entity. The User gives his consent to the access and collection by the Owner of the Site and the relevant payment system, bank or other payment intermediary to the specified personal data and agrees with

the terms of use and privacy policy of the relevant payment intermediary.

5.5. Information and personal data received by the Site Owner when the User uses the Software:

5.5.1. Data on the status of software use: user sessions, the User's completion of individual elements of the software (routes, drone models, etc.), the User's achievement of the results provided in the software when using the software, including the successful completion of all mandatory stages/elements for obtaining the corresponding certificate.

5.6. The Site Owner has the right, but is not obliged, to request from the User a copy of an identity document or other document containing the User's first name, last name, photograph, as well as other additional information that, at the discretion of the Site Owner, will be necessary and sufficient to identify such User and will prevent abuse and violation of the rights of third parties.

5.7. The User is responsible for the completeness, correctness and relevance of the data provided within the framework of using the Site.

5.8. The owner of the site does not process special categories of personal data, in particular, information concerning race, nationality, political views, religious or philosophical beliefs, intimate life, health status.

5.9. The owner of the site does not process personal data of minors (under 18 years of age or another age in other jurisdictions) without the consent of their parents or legal representatives. Registration of minor Users on the Site is not allowed.

6. Advertising and marketing information

6.1. The owner of the site may place marketing and advertising information on the Site, including third parties, as well as by placing banners and other links to third party resources.

6.2. The Site Owner may send Users informational, marketing or advertising messages related to the Site Owner's business and the software sold through the Site, including notifications about the appearance of new software functionality available for purchase and/or download, and 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 a notification in the User's personal account on the Site, and/or sending it to the email address and/or phone number or other messenger specified by the User upon registration on the Site.

6.4. The User has the right to revoke their consent to the sending of such messages to an email address and/or telephone number or other messenger at any time by unchecking the corresponding box in the User's personal account on the Site.

6.5. In the event that the User refuses to receive marketing and advertising materials, the Site Owner retains the right to send the User other non-advertising notifications related to the use of the Site and/or software, including those related to the execution of the license agreement with respect to the software.

7. Third party access to personal data

- 7.1. The owner of the site may transfer the User's data to its partners subject to the consent of the User, as well as in the absence of the direct consent of the User - in cases stipulated by law (for example, to payment service providers, without which it is impossible to fulfill obligations to the User to accept payment for the software license).
- 7.2. The owner of the site may also provide personal data of Users:
 - 7.2.1. service providers who provide assistance in providing the software as stipulated by the agreements (for example, fraud investigation, payment collection, consulting services);
 - 7.2.2. to law enforcement agencies, other government agencies or third parties in response to a request for information in situations provided for by law, for example, as part of an investigation of criminal cases, other illegal activities or any activity that may result in the Owner of the Site or the User being held liable.
- 7.3. Third parties may receive user data as a result of using third party cookies on the site, including but not limited to web analytics services. The procedure and conditions for such access are described in more detail in the Cookie Policy.
- 7.4. The Site may contain advertising banners or links to third party sites. If the User follows such links, the User's personal data may be transferred to such third parties. The Site Owner is not responsible for the methods and techniques of processing the User's data by third parties in this case.

8. Terms and procedure for processing and storing personal data

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

9. Procedure for storing and protecting personal data

- 9.1. The owner of the site takes technical and organizational-legal measures to ensure the protection of the User's personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, distribution, as well as from other illegal actions.
- 9.2. In particular, to protect the User's data, the Site Owner may perform the following activities:
 - 9.2.1. conduct an assessment of the risks of processing personal data and apply measures to ensure their security;
 - 9.2.2. conduct an assessment of the harm that may be caused in the event of a violation of the requirements for the processing and ensuring the security of personal data;
 - 9.2.3. apply measures to protect Users from the risks of discrimination, data theft, fraud using personal data, financial losses, damage to reputation, breach of data confidentiality and any other significant economic or social damage;
 - 9.2.4. take legal, organizational and technical measures to protect data from illegal actions in relation to personal data;
 - 9.2.5. ensure unlimited access to this Policy, as well as the ability to communicate with the Site Owner through the feedback system;
 - 9.2.6. appoint a person responsible for organizing the processing of personal data, familiarize employees with the requirements of legislation in the field of personal data protection, and conduct training for such employees;
 - 9.2.7. conduct internal audits of the processes of processing and protecting your personal data;
 - 9.2.8. inform the subjects of personal data or their representatives about the availability of personal data and provide the opportunity to become familiar with this personal data if the legislation applicable to the Owner of the site does not establish any restrictions;
 - 9.2.9. stop processing and destroy personal data in cases stipulated by legislation in the field of personal data.
- 9.3. The User's login and password are used to authorize 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 also obliged to take measures to ensure their confidentiality.
- 9.4. The owner of the site does not make decisions affecting the rights and legitimate interests of the User based solely on the automated processing of personal data, except in cases of providing information based on the results of a request made by the User himself using the Site interface or software.

10. Rights of the personal data subject

The owner of the site guarantees the provision to the User of the following rights free of charge, exclusively in relation to his personal data:

- correct the personal data provided if it is incomplete and/or are incorrect;
- revoke consent to the processing of personal data with subsequent destruction of personal data;

- receive information regarding the processing of personal data;
- restrict processing and delete personal data;
- if the User believes that his rights and interests have been violated, he may file a complaint a claim to the Site Owner or contact the relevant supervisory authority or the court.

11. Communication with the Site Owner

- 11.1. The User has the right to send the Site Owner a request or complaint at any time related to the use of his personal data via the feedback form. In such a request, the User must indicate his contact information by which the User and his account on the Site can be identified (last name, first name, contact e-mail address).
- 11.2. The owner of the site responds to User requests within 14 days from the date of sending the request.

12. Final Provisions

- 12.1. The owner of the site, in the context of improving the work with personal data and developing the Site, has the right to make changes to this Policy from time to time. The new version of the Policy comes into force at the moment of its publication on the Site.
- 12.2. Users are notified of changes to the Policy during their next authorization on the Site and will be required to accept the terms of the new version of the Policy or stop using the Site.
- 12.3. The owner of the site retains access to previous versions of the Policy, indicating the period of their validity.