

## PRIVACY POLICY

### 1. General provisions

**1.1. LitCom** – is an online platform (hereinafter - the Platform) that allows you to register as a User (1) through the "website" or (2) by downloading the LitCom mobile application and listening to Litcasts, as well as using other software functionalities.

Terms are defined in the LitCom Terms of Use.

**1.2. Processing Policy.** These Personal Data Processing Rules (hereinafter - the "**Policy**") regulate the procedure for processing the personal data of Users and other data subjects who will register on the Platform or otherwise interact with LitCom.

**1.3. Data controller.** This Policy is approved by LitCom, which has the status of the data controller for the purposes of this Policy (the Controller's details are indicated in the contact section). The data controller is a natural or legal person who determines the purpose of personal data processing, establishes the composition of this data and the procedures for their processing, unless otherwise specified by law.

**1.4. Data processor.** A data controller is a natural or legal person who is authorized by the data controller or by law to process this data on behalf of the data controller. Usually, the processor provides services to the data controller and does not have an independent interest in the processing of personal data (for example, provides telecommunication services, cloud services, payment operations, performs tasks of the controller or processes information in his interests).

**1.5. Data subject.** The data subject is a natural person who registered as a User (1) through the "website" or (2) by downloading a mobile application, and in some cases other natural persons interacting with LitCom (hereinafter also "**You**", "**Your**").

**1.6. Data processing.** Data processing - any operation or set of operations, such as: collection, recording, accumulation, storage, adaptation, alteration, retrieval, use and dissemination (distribution, realization, transfer), pseudonymisation, destruction of personal data, including from using information (automated) systems.

### 2. Rules according to which personal data are processed

**2.1. Personal data.** Personal data means any information or a set of information relating to an identified or identifiable natural person.

**2.2. Categories of personal data processed.** We provide you with a description of the categories of personal data that we process, thereby ensuring transparency of the procedures.

<b>Personal (profile and contact) information:</b>	When you register on the LitCom platform or later when using the app, you provide the following information about yourself: <ul style="list-style-type: none"><li>● Email address;</li><li>● Mobile phone number;</li><li>● Date of birth;</li><li>● Full Name.</li></ul> We collect/process the above contact information provided by a natural person during registration on the LitCom platform as a User, as well as additionally: IP address and technical information obtained, including through cookies. The settings of the personal account may contain other fields to be filled in or set, which help to collect other personal data.
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<p><b>Data on the User's choice, uploaded files actions within the application</b></p>	<p>When using LitCom, we collect/process data regarding:</p> <ul style="list-style-type: none"> <li>● User in-app activity (including information on user preferences and interest, as well as in contrary, negative filters and reviews;</li> <li>● Voice files, audio files, photos uploaded by User;</li> <li>● Information on interaction with the app (including posts' view counts and audiofiles' stream counts</li> <li>● In-app search history;</li> <li>● User created content within the app.</li> </ul>
<p><b>Payment and financial information:</b></p>	<p>When using the LitCom platform as a litcaster, the Platform may request the following additional information (this information may be collected by LitCom for analytics, making additions, making payments to the User/Litcaster for content hosting services or returning erroneously paid funds or Litcoins:):</p> <ul style="list-style-type: none"> <li>● Registration number of the taxpayer's card;</li> <li>● Bank information (account number, card expiration date, CVV code and other necessary data at the request of LitCom);</li> <li>● Residential address or registration address;</li> <li>● Names on the card, passwords, digital codes to confirm payments;</li> <li>● Account details.</li> </ul>
<p><b>Information about creative interests and activities:</b></p>	<p>We also collect information about the actions you take on the LitCom platform, including:</p> <ul style="list-style-type: none"> <li>● Search requests;</li> <li>● Books you read or liked;</li> <li>● Litcasts you listen to or like;</li> <li>● Purchase of content;</li> <li>● Users with whom you communicate or exchange content;</li> <li>● A Litcast or other content created by you (comments, reviews, likes, etc.);</li> <li>● Posts and comments created by User within the app.</li> </ul>
<p><b>Information about the application and its operation</b></p>	<p>During the use of the application by the User or in background running mode, we collect information about its operation (including data from the error log, diagnostics regarding the performance of the application).</p>
<p><b>Legal information:</b></p>	<p>We collect/process any other information you provide, including through the website, mobile application, hotline, written, by post and other communication channels (including, but is not limited to messages and letters sent to contact address of LitCom or its partners), to process claims and for other necessities.</p>
<p><b>Cookies, plugins, device identification and other settings:</b></p>	<p>When you use the LitCom platform, we collect the following information about you:</p> <ul style="list-style-type: none"> <li>● Device type and settings;</li> <li>● Operating System;</li> <li>● Application version number;</li> <li>● IP address;</li> <li>● Date and time of visiting the LitCom platform;</li> <li>● The URL from which you accessed the LitCom platform.</li> </ul> <p>The legislation does not explicitly refer to cookies as personal data. However, the website and mobile application may use cookies to improve the use of functions and identify likes and preferences of Users, which allows to improve the quality of service provision. Also, in the case of using social network plugins, additional personal data made public by you on social networks.</p>

	LitCom reserves the right to develop a separate Cookie Policy.
<b>Personal data about third parties:</b>	By notifying us of personal data of third parties (for example, members of your family, employees) you guarantee that such transfer of data is carried out with the consent of such third parties, or there are other legal grounds for the transfer of personal data (for example, you act as one of the parents of a child). Transferring personal data of third parties to us may be appropriate in the case of special promotions, conditions or implementation of rules that allow the interaction of several individuals (for example, joint participation in a raffle or loyalty program, etc.).
<b>Data on minors:</b>	Any data about minors under the age of 14 may be transferred to us only with parental consent. Parents are responsible for exercising parental control over minors' use of their devices and Internet activity. We have the right to block Users if their activity does not comply with the law or requires parental consent, until such consent is obtained, as well as to apply additional requirements or restrictions.

**2.3. Place of storage of personal data.** The data is stored on the LitCom server as the data controller.

**2.4. Access to your own personal data.** Your personal data regarding your actions and other useful information for the convenient use of LitCom is directly available to you, as it is contained in the user profile, which is available after registration in LitCom. Regarding access to other personal data, please send requests to LitCom.

**2.6. Consent to personal data processing.** The consent of the data subject is a freely will of a natural person (provided that he/she is informed) regarding the granting of permission for the processing of his/her personal data in accordance with the designated purpose of their processing, expressed in writing or in a form that makes it possible to conclude that consent has been given. In the field of e-commerce, the consent of the data subject may be given during registration in the information and telecommunications system of the subject of e-commerce by marking the consent to the processing of his/her personal data in accordance with the stated purpose of their processing, provided that such a system does not create opportunities for processing personal data until the moment of putting a confirmation mark. The consent of the User as a data subject to the processing of personal data is the main basis for the processing of personal data. Consent is given in electronic form during registration as a User. However, in some cases, processing of personal data may be carried out on the basis of a contract, legislation or other legal basis, including when you have withdrawn your consent to the processing of personal data.

**2.7. Purpose and legal basis of personal data processing.** Personal data is always processed for a legitimate purpose, if there is a corresponding legal basis.

Purpose of processing	Basis for personal data processing
Ensuring the operation of the Platform, providing services related to the online ordering of flights	<ul style="list-style-type: none"> <li>● Consent given during registration as a User;</li> <li>● LitCom Agreement and Terms of Use;</li> <li>● Civil, economic and tax legislation (execution of contractual and tax obligations).</li> </ul>
Processing of orders, inquiries, appeals, requests, claims of the User or a third party, interaction with persons through, correspondence, hotline, social networks or messengers, return/exchange of goods, processing of other messages.	<ul style="list-style-type: none"> <li>● Consent given during registration as a User;</li> <li>● LitCom Agreement and Terms of Use;</li> <li>● Civil, economic and tax legislation (execution of contractual and tax obligations).</li> </ul>
Detection of violations in LitCom's operating and for security purposes	<ul style="list-style-type: none"> <li>● Consent given during registration as a User;</li> <li>● LitCom Agreement and Terms of Use;</li> <li>● Civil, economic legislation (implementation of legal rights regarding data security, protection of human rights, legitimate interest in troubleshooting and security of our offers).</li> </ul>

Personalization and advertising of LitCom, Litcasters and advertising of third parties, as well as market research and measurement of audience coverage, spread of commercial offers to the User from third parties	<ul style="list-style-type: none"> <li>• Consent given during registration as a User;</li> <li>• LitCom Terms of Use.</li> </ul>
Ensuring security, LitCom activities and legal rights	<ul style="list-style-type: none"> <li>• Consent given during registration as a User;</li> <li>• LitCom Agreement and Terms of Use;</li> <li>• Civil, economic legislation (for the realization of a justified interest on our part in the defense and protection of our rights, in case of their violation by the User or third parties).</li> </ul>
Improving the quality of activities of LitCom and third parties, improving the user experience, work efficiency	<ul style="list-style-type: none"> <li>• Consent given during registration as a User;</li> <li>• LitCom Agreement and Terms of Use;</li> <li>• Data received from Users in the process of using LitCom, information about preferences, other information obtained in the process of use can be used by us and the persons involved in the provision of services, with the aim of improving the process of providing services and products, creating a more convenient process of use for the User.</li> </ul>

**2.8. Data transfer.** Data transfer is one of the types of processing of personal data. Personal data may be transferred to other parties, including cross-border transfers, provided this Policy is not violated. All processes of transfer of personal data from the controller to other persons are legal, as they are described in this Policy, consent to the processing of personal data (which includes transfer) is given by a natural person during registration as a User.

1. The controller transfers personal data for the functioning of LitCom:	
1-1. To other controllers of personal data	For example, We transfer personal data to advertisers, sellers of goods, service providers (persons involved in the provision of services).
1-2. To processor of personal data acting on behalf of the controller	For example, We transfer personal data to entities that provide Us with marketing services; programming; data storage, and other types of services necessary for the performance of relations with Users.
1-3. To staff	Access to personal data may be granted by the Controller to its employees for the carrying out of their professional, official or labor duties related to such personal data, exclusively in full compliance with the legislation on personal data protection, confidentiality and non-disclosure provisions. Employees do not disclose personal data, both during the employment relationship and after the termination of the legal relationship with LitCom.
1-4. To subjects belonging to the category of "third parties"	Contractors may be considered third parties within the meaning of the legislation.
2. The Controller transfers personal data for the extended purpose of their processing or pursuant to the law:	
2-1. To subjects belonging to the category of "third parties"	The Controller may transfer personal data to other "third parties", with the consent of the Seller, in particular for advertising and marketing purposes (at the same time, as a prerequisite for the transfer of personal data, the Controller defines their protection by such a third party, compliance with the purpose of processing and provision of the "unsubscribe" function with the deletion of personal data).
2-2. State authorities and local self-government bodies	As part of their powers, for the implementation of tax, banking legislation, anti-money laundering legislation, etc. In most cases, the transfer of data does not require the prior consent of the User.

**2.9. Duration of storage of personal data.** Your consent to processing is given indefinitely. We store the data for the entire duration of the User's registration on the LitCom platform (for the duration of the user profile) and for an additional time from the moment the user profile is deleted, as long as we have a legitimate interest in further storage (e.g. for marketing purposes) or if required by law (e.g. tax payment, dispute resolution, warranty support, law enforcement, etc.).

**2.10. Protection and confidentiality of personal data.** Protection of confidentiality in the processing of your personal data is a key requirement that we adhere to in our activities. We process personal data obtained during your visit to the LitCom platform with confidentiality and in accordance with legal regulations. Data protection and information security are an integral part of our corporate policy. We pay attention to the protection of data when transferring it to other owners, managers, our staff and third parties, and we also check the adequacy of the powers of government authorities when requesting your personal data.

### 3. Rights of data subject

**3.1. Legal rights.** A natural person who has registered as a User has the right provided for by law as a data subject:

- 1) to know about the sources of collection, the place of storage of personal data, the purpose of their processing, the location or place of residence (residence) of the data controller or data processor or to give an appropriate mandate to obtain this information to persons authorized by him, except for cases established by law;
- 2) to receive information about the conditions of providing access to personal data, in particular information about third parties to whom his personal data is transferred;
- 3) to access your personal data;
- 4) to receive no later than thirty calendar days from the date of receipt of the request, except in cases provided by law, an answer on whether his personal data is being processed, as well as to receive the content of such personal data;
- 5) present a reasoned demand to the data controller with an objection to the processing of his/her personal data;
- 6) make a reasoned demand for the change or destruction of your personal data by any data controller or data processor, if these data are processed illegally or are unreliable;
- 7) to protect your personal data from illegal processing and accidental loss, destruction, damage due to intentional concealment, failure to provide or untimely provision, as well as protection from providing information that is unreliable or disgraces the honor, dignity and business reputation of a natural person ;
- 8) file complaints about the processing of your personal data with the Commissioner or the court;
- 9) apply legal remedies in case of violation of the legislation on the protection of personal data;
- 10) enter a reservation regarding the limitation of the right to process your personal data when giving consent;
- 11) withdraw consent to the processing of personal data;
- 12) know the mechanism of automatic processing of personal data;
- 13) to protect against an automated decision that has legal consequences for him;
- 14) additional rights under GDPR.

**3.2. Special rights.** Special rights under the terms of this Policy:

**3.2.1.** You can send a request for rectification of inaccurate data, addition or complete deletion of your data, including by deleting the user profile. The user is guaranteed compliance with the right to delete data, except for situations where the storage, processing or transfer of such data is necessary to fulfill the provisions of the law.

**Deletion of data** means that it is no longer actively used in normal processes, however individual data continues to be stored for legal compliance purposes or technically stored in backup copies of databases, without active use.

**3.2.2.** Prohibition on data processing for advertising purposes (marketing). The user can at any time make a request to prohibit the processing of personal data for advertising purposes. At the same time, please note that after registration of the refusal, your data may still be used for some time within the framework of the current advertising campaign. If the User transfers personal data to third parties, then Users are guaranteed the right to "opt out" of receiving advertising. Consideration of such a request is carried out within a reasonable time.

**3.2.3.** Individual privacy settings are provided through software functionality, including:

- different levels of consent (consent to processing personal data, consent to receive marketing information);
- various cookie settings;
- setting the "unsubscribe" function;
- others introduced by the Controller.

#### **4. Use of cookies and other technical files**

**4.1. Cookie categories.** When providing our online services, cookies and user tracking mechanisms may be used. To a lesser extent, cookies are used during the operation of the mobile application.

Cookies are small text files that are stored on your device when you visit our online services. Tracking can also be carried out using other technologies. In particular, we process information using pixel technology and/or when analyzing log files. We distinguish between cookies that are mandatory for the normal technical operation of the online service and cookies and tracking mechanisms that are not necessary for the online service to function. In general, it is possible to use the online service without any cookies that are not intended to ensure the operation of the service from a technical point of view.

#### **5. Final provisions**

##### **5.1. Change of personal data protection policy**

The data controller reserves the right to make changes to the Policy, supplement or change measures to ensure security and data protection if necessary. The presence of changes is notified to the Users in advance, by updating this document on the website and in the mobile application, or in another way. If the User has not terminated registration on the platform before the new version of the Policy enters into force, it is considered that the User has not withdrawn his consent to the processing of personal data and confirmed his consent to the processing of personal data under the terms of the new Policy.

##### **5.2. Contact Information**

If you have any questions regarding the Personal Data Protection Policy, you can contact us as the data controller by sending a letter to the official email address - see Contacts section.