

PRIVACY POLICY

Effective Date: 30 March 2020

This Privacy Policy sets forth our standards for protection and security of personal and other data obtained from:

- visitors and users of the website <https://twin24.ai> (the “Website”);
- users of Twin 24 products and services (the “Services”).

The Website and Services are owned and operated by Uralinnovatsia LLC, d/b/a Twin 24, having its legal address at rab 1, office 1463, 42-1, Boulevard Bolshoi, Moscow, Russia. The company operates under the brand name of “Twin 24” which is used throughout the Privacy Policy to refer to the owner and operator of the Website and Services.

Twin24 may obtain personal data from its customers that license Twin24 Services.

This Privacy Policy is the integral part of the Terms and Conditions (“Terms”).

Please read this Privacy Policy carefully.

1. Definition of Personal Data

Throughout this Privacy Policy, we refer to your “personal data” which is any data that directly or indirectly relates to an identified or identifiable natural person as provided by the Russian Personal Data Law.

2. Collection of your Personal Data

Twin 24 collects personal data in a number of ways. We collect your personal data, when you voluntarily:

- visit, browse, and use our Website;
- order and/or use our Services;
- contact us with any enquiries and in relation to the Website and/or Services;
- provide full name, passport details, address and other requested information during identity verification;
- send us an email with personal data;
- communicate with us, our staff through the Website, via email or phone;
- provide any information to Twin 24.

Twin 24 may collect the following personal data:

- information provided by the user during identity verification, including, full name, phone number, postal address, email address and similar contact details;

- financial information when you pay for our Services, including, without limitation, credit or debit card number, card name, etc;
- professional information about you, including, without limitation, company name, job title, email address;
- information that you provide to Twin 24 when Twin 24 reasonably requests it in order to provide you with consulting and other services;
- any other personal data which you directly provide to Twin 24.

By submitting the data, you confirm that you have the right to authorise us to process it on your behalf in accordance with this Privacy Policy.

Our Website can be visited anonymously. The Website processes anonymous metadata such as the URL of the requested file, the amount of data transferred, the date and time of the request from the user, Internet browser information, operating system type, the IP address of the used device, the Internet service provider, reference links such as user clicks on certain links.

When you visit our Website and use our Services, we may automatically receive some information that identifies, for each page accessed:

- the type of browser and operating system you have used;
- the IP (Internet Protocol) address of the device which has accessed it (example PC, tablet);
- the date and time of your visit to the Website;
- the pages accessed and documents downloaded;
- your top-level domain name (for example .com, .ru, .eu, etc.);
- the address of your server;
- the previous website visited;
- the average duration of page view;
- the navigation behaviour and preferences of the user.

This anonymized data cannot be used by the Website to obtain personally identifiable information. This information is only used for general purposes, such as technical improvements, statistical and marketing analysis.

3. Cookies

We may use cookies to analyze and improve our Services.

Google Analytics; Yandex Mertics

We do not disclose any information received with the use of cookies except for our service providers. Thus, we may use certain third party services, such as Google Analytics and Yandex Metrics that helps us

to analyse usability and user experience. You authorize Twin24 and its service providers to perform analytics on such data that do not personally identify you, to (i) improve, enhance, support and operate the Website and Services; and (ii) collect statistical data and prepare statistical reports.

You may use the settings within your browser to control cookies or prevent accepting some or all cookies. To find out more useful information on how to block cookies using different browsers, please visit www.allaboutcookies.org. You can block or delete all or some cookies. However, blocking or deleting cookies may limit your use of full advantages of our Website.

4. Legal basis

Twin 24 collects and processes personal data about visitors, users and customers only if Twin 24 has lawful basis. Lawful basis includes:

- consent (where you have given consent);
- contractual obligations (when the processing is necessary to perform our obligations under a contract);
- legitimate interests;
- necessity under applicable law

Where we rely on your consent to process personal data, you have the right to withdraw or decline your consent at any time and where we rely on legitimate interests, you have the right to object.

The legitimate interests are:

- analysing and understanding your behaviour on the Website;
- providing you with the Services;
- making improvements to the Services;
- enabling us to enhance, customise or modify our Services and communications;
- improving data security;
- determining whether marketing campaigns are effective.

5. Minors

Twin 24 does not knowingly provide Services and collect personal information from anyone under 18 years of age. Our Services are available only to the users over 18 years old. If we learn that we have collected the personal information of a child under 13, or equivalent minimum age depending on jurisdiction, we will take steps to delete the information as soon as possible.

6. Sharing your Personal Data

Twin 24 may share your information with:

- service providers we work with to deliver some Services;

- legal and regulatory authorities, as required by applicable laws and regulations;
- our employees;
- our auditors, lawyers, accountants, consultants and other professional advisors, where it is reasonably necessary for obtaining advice, professional services, or managing legal disputes.

We will not disclose, sell, trade, or otherwise transfer your personal data to any third parties without your consent or unless otherwise stated in this Privacy Policy.

This Privacy Policy does not apply to the practices of service providers and other third parties that we do not own or control, or individuals that we do not employ or manage.

7. Sensitive Data

We do not collect or request your sensitive data (including, but not limited to, information about your religious or political beliefs, opinions). Where you have provided it to us voluntarily, you shall be solely responsible for security of any sensitive data, and we do not intend to use this data for any purpose, nor share this data with any third parties. Please do not share sensitive and other personal data that you would not want to be publicly available.

8. Use of Personal Data

Personal data will be collected, held, used and disclosed for the following purposes jointly and/or severally:

- for the purposes for which it was collected (as set out in this Privacy Policy);
- to provide you with the Website and Services requested;
- to identify you;
- to communicate with you as described in this Privacy Policy;
- to provide you with newsletters you subscribed to;
- to process any requests;
- to perform marketing analysis and to conduct market research;
- to develop new products and services;
- to the extent permissible or necessary by law, for any other purpose as may be deemed reasonably necessary by Twin 24 in the circumstances;
- to perform other activities as described in the Privacy Policy.

9. Users' Rights in relation to its Personal Data

You may access your personal data held by us to correct, update and remove inaccurate or incorrect data.

You have the following rights:

- delete some or all personal data that we held about you;

- change or correct your personal data that we held about you;
- object to, or limit or restrict, use of your personal data;
- right to access and/or take your personal data: you can ask us for a copy of your personal information in machine readable form;
- ask not to use your personal data for marketing purposes;
- access information we hold about you.

If you want your personal data to be corrected, updated or removed, please contact us at info@twin24.ai.

If you wish to correct, update, modify or delete personal data which is processed by us on behalf of our customer or if you are an end-user of one of our customers and would no longer like to be contacted by one of our customers that uses our services, you should direct your query to our customer. If requested to remove data, we will respond within a reasonable timeframe.

10. Security of Personal Data

We use certain adequate technical and organisational measures to ensure the confidentiality of your personal data. While we strive to use commercially acceptable means to protect your personal data, no method of transmission over the Internet, or method of electronic storage, is completely secure, and we cannot guarantee absolute security of your personal data.

11. Data Retention

Twin 24 stores personal data in Russia.

Under the Russian Personal Data Law, Twin 24 records and stores personal data of Russian citizens using database within the Russian Federation.

We retain your personal data for as long as it is necessary to fulfil the purposes for which we collect it or as needed to provide you with the Services, except if required otherwise by law.

In some cases, we may determine the period of data retention based on the period we need to access the data for the provision of Services, receiving payment, resolving your customer support issues or for any other auditing or legal purposes.

Retention periods may be changed from time to time based on regulatory requirements.

12. Communications

Twin 24 may send you notifications which are of two types:

- system notification (examples of such notification may include payment confirmation, renewal notification);
- product and service notifications that you directly subscribed to.

It should be noted that you may not unsubscribe from system notification as these emails contain important service information and are sent for your legitimate interests. You may unsubscribe from product and service notifications any time by visiting an opt-out page.

13. Merge of Company

If Twin 24 merges with, or is acquired by, another company or organisation, or sells all or a portion of its assets, your personal data may be disclosed to our advisers and any prospective purchaser or any prospective purchaser's adviser, and may be among the assets transferred. However, personal data will always remain subject to this Privacy Policy.

14. Changes to the Privacy Policy

We may change this Privacy Policy from time to time. As soon as the Privacy Policy is updated, Twin 24 will post an updated version of the Privacy Policy on the Website. The new Privacy Policy becomes effective from the moment it is posted or updated on our Website. We will send you an email notification to alert you about such changes if you provided us with your email address.

Contact us

info@twin24.ai