



Privacy Policy



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This Privacy Policy describes the information collected by Applied Systems Ltd. (hereafter referred to as “we,” “us” or “our”) through our website www.appsys.net and mobile apps.

We take user trust seriously and recognize the importance of privacy concerns especially in the digital environment. With this in mind, we have adopted this Privacy Policy to clarify the following issues:

- *ways of collecting and using such information;*
- *protecting it from unauthorized access;*
- *terms of sharing and disclosure.*

THIS PRIVACY POLICY IS PART OF THE TERMS OF SERVICE WHICH YOU, OR IF YOU HAVE NOT REACHED THE AGE OF MAJORITY IN YOUR JURISDICTION, A PARENT OR LEGAL GUARDIAN, MUST READ AND ACCEPT ON YOUR BEHALF.

IF YOU, OR YOUR PARENT/GUARDIAN ON YOUR BEHALF, DO NOT WISH TO BE BOUND BY THE TERMS OF SERVICE, INCLUDING THIS PRIVACY POLICY, PLEASE EXIT THE SERVICE NOW AND DO NOT DOWNLOAD, ACCESS OR USE OUR SERVICES.

1. TYPES OF COLLECTED DATA

On our website and apps, we collect personal information in two forms:

- i. Personally identifiable information is the information that can be used to identify or contact an individual, whether online or offline, including, but not limited to name, email, phone number and company name. We urge you to provide these data in connection with certain activities.

We will ask you for such information by a direct request. Most of the activities on our website do not require you to submit any personal information.

- ii. Non-personally identifiable information is the anonymous information that is automatically collected from your computer, mobile or other devices. This information includes non-personal data about visiting websites or apps such as date and time of sessions, pages viewed, IP-address, type of browsers and OS used.

We may use third party analytics services such as Google Analytics, to collect and use certain data including, but not limited to:

- i. Device properties, including, but not limited to IP address, Media Access Control (“MAC”) address and unique device identifier or other persistent or non-persistent device identifier (“Device ID”);
- ii. Device software platform and firmware;
- iii. Time spent in apps and websites;
- iv. Other non-personal data as reasonably required to enhance the service and other products and services.

2. PRIVACY PRINCIPLES

Our Privacy Policy is based on the following principles:

- You are free to choose whether or not to engage in any activity on our website and apps that involves your submission of personal information;
- Third parties that we use to assist with the website and apps are required to follow this Privacy Policy;
- We use the anonymous information that is automatically collected from your device, such as a computer's Internet Protocol address, a mobile device identifier, operating system, to support internal operations so that we can understand and monitor the usage and improve the performance of our website and apps.

Internal operations include the following:

- i. to monitor metrics such as total number of visitors and traffic;
- ii. to understand which activities and services are most popular;
- iii. to understand the pages where visitors enter our site and the pages viewed;
- iv. to recognize the browsers used to visit our website, so that the content is adapted for the relevant browser;
- v. to diagnose and fix technology problems.

3. USAGE OF DATA

In accordance with the Law of the Republic of Belarus «On information, informatization and information protection» from 10.11.2008 №455-3, we provide the opportunity for you to opt out of certain types of usage of your personal data when supplied to us via registration forms. If you want to update your personal data or remove it from our records, you can request this by emailing us.

We retain the data collected pursuant to this Privacy Policy for the period necessary to fulfill the purposes, outlined in this Privacy Policy unless a longer retention period is required or permitted by law. Thereafter if the collected data is no longer needed for purposes specified in this Privacy Policy, we delete all aforementioned data in its possession within a reasonable timeframe.

We may disclose personal and non-personal data to our partners and contractors for purposes of analyzing usage of our apps and website, providing customer and technical support, managing and providing other services. We share this information in an aggregated and anonymized manner such that will not in any way identify a user. Except for what is stated in this Privacy Policy, we don't sell, share, rent or provide personally identifiable information to the third parties.

We may disclose your personally identifiable information, or use it in other ways to contact you, if it is needed or required by law to:

- i. comply with regulatory requirements or upon the request of public authorities;
- ii. protect our property rights
- iii. enforce our corresponding service agreement;
- iv. protect personal safety or interests of our employees;

with the further notification of the disclosure of such information by email.

In addition, we may disclose your personally identifiable information with law enforcement or other appropriate third party agencies in connection with a criminal investigation, investigation of forgery, intellectual property rights violations or other suspected illegal activities, or for any other reason, if it is required or advisable under applicable legislation, or at our own discretion, if we find this necessary to protect the legal interests of Applied Systems Ltd.

Any data gathered through our website and apps are used for internal purposes only. These data are not shared with other organizations without users' permission.

We don't knowingly collect personal information from children under the age of 13, and if in the event that a user identifies himself or herself as a child under the age of 13 through a support request, we will not collect, store or use, and will delete in a secure manner, any personal information of such user.

We do not make personal information collected from users publicly available.

Users may contact us at any time to review, update or delete any of their personal information that we may have collected and to notify us not to collect any additional personal information from them.

When you request support, you may send us an email or contact us via our contact page on our website.

When you visit our website, we may send cookies to your computer that uniquely identify your browser.

We use cookies to improve the quality of our service by storing user preferences and tracking usage information.

A "cookie" is a piece of information that a website or an app transfers to a user's device for record-keeping purposes. As a user moves from one page or one screen to another, a cookie is used to tell us that it is the same device. We also may use a cookie to keep track of your selections. You may set your device to accept or not accept cookies, and you may delete any cookies that you have received.

However, should you decide to disable any cookies that we place on your device, you may not be able to use certain services or features on our website or apps.

Applied Systems' Ltd. cookies do not include personal data and are typically used to quickly identify a user's device and to "remember" the user.

A "web beacon" or a "pixel tag" is an electronic image that allows us to count users who have visited certain pages. Web beacons, like cookies, do not include personal data. E-mails and other electronic communications that are sent to a user may contain pixel tags that enable us to track a user's usage of the communication, including whether the communication was opened and/or what links were followed, if there are any.

Your information collected through a website or an app may be stored and processed in the Republic of Belarus or in any other country in which we or our service providers maintain facilities. If you are located in the European Union or other regions with laws governing data collection and use that may differ from the Belarusian law, please note that we may transfer information, including personal information, to a country and jurisdiction that does not have the same data protection laws as your jurisdiction with your explicit consent only, that we will request directly.

4. SPECIFIC LOCATION PRACTICES: European Economic Area (EEA) Privacy Rights

If you use our services on the territory of the European Economic Area (EEA) in compliance with the local law you have specific rights regarding your personal information.

According to these rights you can:

1. Access your personal information;
2. Change/correct your personal information that we store (hold) about you;
3. Delete your personal information;
4. Put under restrain or limit our use of your personal information;
5. Receive your personal information in the prescribed electronic format and forward it to a third parties (right to data portability);
6. Lodge a complaint with the local data protection authority.

To get more detailed information about how to exercise your rights on the European Economic Area click [here](#). If you want to understand your rights better or learn how to exercise them, please, use the contact information given below. If we need more detailed information for your request execution, we will contact you back.

To process your personal information we need a legal basis. In most of cases such basis may be:

1. Fulfilment of our obligations under the contract, ex. in terms of providing services;
2. Your consent to data processing;
3. Compliance with our obligations as mentioned above;
4. Compliance with our legitimate interests, ex. to learn how exactly you use our products and services and use this information for the further development of new products and services, and personalization the services for you;

Processing personal data in the framework of implementation of our legitimate interests, we use all reasonable efforts (measures) to ensure your privacy and prevent the conflict between our business' interests and users' interests, fundamental rights, and freedoms.

5. Protection of the vital interests of the data subject, information or another natural person;
6. The necessity for implementation an action carried out in the public interest

We can request your consent to collect and use certain personal information in accordance with applicable legal requirements (law), ex. in relation to Cookie files and Tracking Technologies or in case of usage your accurate location data for purposes other than performing services.

If you gave us your consent to your personal information processing, you can withdraw it at any time, using the contact information given in this actual Privacy Policy.

Contact us if you want to update or correct your information, or if the personal information we hold about you is inaccurate.

5. DISCLOSURE OF DATA

We may use personal and non-personal data and disclose personal and non-personal data in accordance with applicable legislation and this Privacy Policy:

- to our partners and contractors for analyzing the usage of our apps and website, providing customer and technical support, managing and providing other services. We share this information in an aggregated and anonymized manner such that will not in any way identify a user.

We may use a parent's personal data to send messages to the parent with informative and/or commercial content about our services.

If a user contacts us by email, we will use the personally identifiable email address information to respond to the specific inquiry only.

From time to time, we may hire agents and contractors to collect and process personal data on our behalf and in such cases, such agents and contractors will be instructed to comply with our Privacy Policy and to use personal data only for the purposes for which the third party has been engaged by us. These agents and contractors can not use a user's personal data for their own marketing purposes. We may use third party service providers such as data analyzers and business intelligence providers. We have the right to share users' personal data if necessary for the aforementioned third parties to provide their services for us. Applied Systems Ltd. is not liable for the acts and omissions of these third parties, except as required by law.

If we sell or otherwise convey part or the whole of our assets to another organization (e.g., in the course of a transaction like a merger, acquisition, bankruptcy, dissolution, liquidation), your personal information, and any other information collected through our website and apps may be among the items sold or conveyed. The buyer or the transferee will be required to honor the commitments we have made in this Privacy Policy.

6. DATA PROTECTION

We follow generally accepted industry standards and maintain reasonable safeguards to attempt to ensure the security, integrity, and privacy of the information in Applied Systems' Ltd.

Possession:

Only those persons with a need to process users' personal data in connection with the fulfillment of their tasks in accordance with the purposes of this Privacy Policy and for the purposes of performing technical maintenance have access to users' personal data in Applied Systems' Ltd.

Personal data collected by Applied Systems is stored in secure operating environments that are not available to the public. However, we cannot and do not guarantee the security of materials or information transmitted to us or other users over the Internet or wirelessly.

Applied Systems makes good faith efforts to enable users to review, update or correct any personal data in our possession. Users should contact us at contact@appsys.net or use the contact page on our website or apps.

We will need sufficient information from the user to establish the user's identity and to verify the user's access, and also to assist in handling the user's request. Even if personal data is changed or deleted according to a user request, we may still retain some of User personal data to resolve disputes, enforce user agreement(s), and comply with technical and legal requirements and constraints related to the integrity, security, and operation of Applied Systems' Ltd. services.

From time to time, as our services evolve, we can update this particular Privacy Policy. You give the consent that we may notify you about the significant changes in the way we process your personal information by sending a notification email to an existing (given) email address.

7. CONTACT US

If you still have any kind of questions regarding our Privacy Policy, please, contact us at contact@appsys.net or simply use the contact form on our website.