



Privacy Policy

The Privacy Policy (hereinafter referred to as the “Policy”) is prepared in accordance with the current international rules and regulations in the area of data protection and privacy including Regulation (EU) 2016/679 “General Data Protection Regulation” (hereinafter referred to as “GDPR”), Directive 2009/136/EU, as well as Directive 2002/58/EU “Privacy and Electronic Communications” (ePrivacy Directive) and others. This Policy provides the **Bitbon System User** (hereinafter referred to as the “User”) with information on why his/her personal data is collected and processed while he/she uses the functionality of the **Bitbon System** infrastructure.

TERMS AND DEFINITIONS

The terms used in this Policy shall be interpreted in accordance with the definitions given in the Appendix to the **Bitbon System Public Contract** [Terms and Definitions in the Bitbon System Social Network](#), as well as with the following definitions:

Personal data is any information directly or indirectly related to a personal data subject. In accordance with GDPR, personal data of a personal data subject shall be:

- full name;
- date and place of birth;
- address of permanent and temporary residence;
- mobile phone number;
- information about family and social status;
- information about education, profession and occupied position;
- information about income and financial situation;
- biometric data;
- cookies (along with other personal data), etc.

Personal data subject is any natural person, whose personal data is subject to processing.

Processing of personal data is any action (operation) or a set of actions (operations) with personal data using automation tools or without using such tools, including



collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data and other actions.

Confidentiality of personal data is a requirement for an Operator to prevent distribution of personal data without the consent of the personal data subject or without any other legal grounds.

SCOPE OF THE PRIVACY POLICY

The Policy establishes the Operator's non-disclosure obligations and ensures confidentiality of personal data.

The Operator can obtain the User's personal data when he/she uses the functionality of the **Bitbon** System infrastructure. This personal data shall be:

- full name;
- telephone number;
- e-mail;
- passport copy;
- occupied position;
- academic degree, academic rank, national awards, titles of honor;
- involvement in projects, consulting;
- experience in public activities;
- country of citizenship;
- correspondence address;
- signature scanned copy.

The data obtained through automatic collection is considered analytical (statistical) and is not the data identifying a certain personal data subject.

The Operator can obtain the following data through automatic collection:

- IP addresses accessing the **Bitbon** System infrastructure;
- information from cookies (a small piece of data sent by a web server and stored on the User's computer, which is sent to the web server in an HTTP request each time he/she tries to open the page of the corresponding website);



- information about browser;
- access time;
- referrer (address of the previous page);
- information related to how the User interacts with the **Bitbon System** infrastructure.

PURPOSES OF COLLECTING PERSONAL DATA

Personal data is collected in order to:

- optimize the operation of the **Bitbon System** infrastructure;
- protect against automated attacks and abuses/hacks;
- improve the data collection, storage and processing methods to prevent unauthorized access to the **Bitbon System** infrastructure;
- measure the performance of the **Bitbon System** infrastructure;
- save settings and session (use of the website or app) data for further use;
- analyze the User's use of the functionality of the **Bitbon System** infrastructure;
- provide information support should any issues related to the use of the functionality of the **Bitbon System** infrastructure arise;
- provide feedback, including sending notifications and requests regarding the use of the functionality of the **Bitbon System** infrastructure, services, processing the User's requests and applications;
- provide updates, special offers, information, newsletters, etc.;
- monitor activity when using the functionality of the **Bitbon System** infrastructure.

All collected personal data shall be used for the specific above-mentioned purposes and only to the extent necessary for the full functioning of the **Bitbon System** infrastructure.



METHODS FOR COLLECTING AND PROCESSING PERSONAL DATA

The User is hereby notified that when he/she uses the functionality of the **Bitbon** System infrastructure, the Operator can obtain data about the applications installed on the device and use this data to implement certain functions of the **Bitbon** System infrastructure.

The Operator may send the User a request for provision of personal data or for permission to process already available personal data.

The information resources of the **Bitbon** System use protection tools to ensure security of the User's personal data. When servicing the information resources of the **Bitbon** System, the Operator receives information that allows detecting and automatically eliminating the components that pose a potential security threat to the **Bitbon** System infrastructure.

The Operator uses a number of processes/methods for protecting the **Bitbon** System infrastructure from unauthorized attempts to access, modify, disclose or destroy data.

The **Bitbon** System uses the **Bitbon** System Authentication service (hereinafter — BSA) to simplify the User's authorization in its services. The BSA service provides the initial identification of the User in the **Bitbon** System services without reentering his/her Space ID and password.

The BSA service uses personal account data to provide limited access to the User's protected data without transferring such data directly to trusted services. The service is based on the OAuth 2.0 open authorization protocol, which provides a third party with limited access to the User's protected data without transferring his/her Space ID, password, and other data.

The BSA service does not use the User's credentials (protected resources) to provide access to services. The authorization is implemented through the User's personal approval of limited access to his/her data requested by the service. After the User approves the access, the authorization server generates an authentication token that confirms the authenticity of the User's data but does not transfer such data to the service, only the authentication token is transferred.



The User approves the transfer upon the first authorization and/or when the list of data required by the service for correct operation is changed. Thus, the User uses the BSA service to get access to specific services without reauthorization and transfer of his/her personal data.

The **Bitbon** System infrastructure can use third-party services that may collect the User's personal data. The User can receive the up-to-date information on third-party service providers used by the **Bitbon** System infrastructure through the feedback form on the information resources of the **Bitbon** System by submitting the relevant request.

The Operator is entitled to transfer the User's personal data to third-party services (third parties) in order to:

- optimize the operation of the **Bitbon** System infrastructure;
- render services related to the maintenance of the **Bitbon** System infrastructure.

The User's personal data may be transferred to the authorized state authorities and/or competent organizations only on the basis and in the manner established by international laws and the laws of the country the User is a resident of.

Personal data is provided to third-party services in accordance with the existing confidentiality requirements for the specific above-mentioned purposes, and only to the extent necessary for the full functioning of the **Bitbon** System infrastructure.

GENERAL TERMS AND CONDITIONS

In the case of the arising questions regarding this Policy, one should contact the Support Service with a request in accordance with this Policy.

Amendments and/or additions to this Policy may be made solely under the rules provided for the Appendix to the **Bitbon** System Public Contract [Making Amendments and/or Additions to the Bitbon System Public Contract](#).

If there is any discrepancy between various versions (printed, electronic, etc.) of this Policy, its electronic version published on the official information resources of the **Bitbon** System shall be deemed the official one.



This Policy is translated into other languages only for convenience of Users. In case of differences in understanding and/or interpretation of this Policy, the Russian version shall prevail.

Only the Operators are entitled to give an official explanation of this Policy.

In accordance with [Provision 2](#) of the **Bitbon** System Public Contract, this Policy is an integral part of the **Bitbon** System Public Contract and comes into force after its publication on the official information resources of the **Bitbon** System.

In accordance with [paragraph 3 of Provision 2](#) of the **Bitbon** System Public Contract, amendments and/or additions may be made to this Policy only if such amendments and/or additions do not contradict the Provisions of the **Bitbon** System Public Contract and Appendices, which are an integral part of the **Bitbon** System Public Contract. Amendments and/or additions made to this Policy shall be published on the official information resources of the **Bitbon** System and come into force in accordance with the Appendix to the **Bitbon** System Public Contract “Making Amendments and/or Additions to the **Bitbon** System Public Contract.”

The Operator has no control over and shall not be responsible for the privacy practices of third-party resources. If the User accepts a privacy policy on a third-party resource, it shall not mean that he/she accepts this Policy and vice versa. The Operator has no control over and shall not be responsible for third-party resources that can be visited by clicking the links available on the information resources of the **Bitbon** System.

The User shall not use the functionality of the **Bitbon** System infrastructure if he/she does not accept the terms and conditions established by the **Bitbon** System Public Contract in whole or in any part.