

PRIVACY POLICY

This Privacy Policy sets out how we, radon-flip.com, collect, store and use information about you when you use or interact with our website, radon-flip.com (our **website**) and the Application ("Flip") made available by the FLIP Service. When we refer to "**Flip**" in Privacy Policy, we mean us, the website, the Application and/or the Services, according to the context. By using the Flip, you agree to be bound by, and to comply with, this Privacy Policy. It is your responsibility to check any updates to this Privacy Policy.

This Privacy Policy is effective from 27th November 2018.

OUR DETAILS:

The FLIP Service (**we, our** and **us**) operates the website, the service and the application.

The FLIP Service is a limited liability company incorporated in Russia. Our registered address is Business-center Meridio, Varshavskoe highway 125 building 5, 4th floor, Moscow, Russia.

Our contact email address is info@radon-flip.com.

INFORMATION WE COLLECT WHEN YOU CONTACT US:

We collect and use information from individuals who contact us in accordance with this section.

Email:

When you send an email to the email address displayed on our website or application we collect your email address and any other information you provide in that email.

Contact form:

When you contact us using our contact form, we collect name, email address, and IP address. We also collect any other information you provide to us when you complete the contact form including any optional information, such as phone number or company name.

If you do not provide the mandatory information required by our contact form, you will not be able to submit the contact form and we will not receive your inquiry.

Post:

If you contact us by post, we will collect any information you provide to us in any postal communications you send us.

INFORMATION WE COLLECT WHEN YOU INTERACT WITH OUR WEBSITE OR APPLICATION:

We collect and use information from individuals who interact with the particular features of our website in accordance with this section.

Registering on our website or Application:

When you register and create an account on our website or Application, we collect the following information: name, email address, IP address, mailing address, contact and any other information you provide to us when you complete the registration form, including any optional information, such as phone number or company name.

If you do not provide the mandatory information required by the registration form, you will not be able to register or create an account on our website or application.

Application usage analytics:

For better customer experience and service improvement, we collect anonymous non-personally identifiable analytics data of Application usage. All analytics data is gathered through a third-party service provider, Google Analytics for Firebase. To find out more about Google Firebase privacy and security, please see the following page: <https://firebase.google.com/support/privacy/>.

INFORMATION WE COLLECT WHEN YOU PLACE AN ORDER ON OUR WEBSITE OR APPLICATION:

We collect and use information from individuals who place an order on our website or application in accordance with this section.

INFORMATION COLLECTED:**Mandatory information:**

When you place an order for services on our website application, we collect your name, email address, billing address, picture, location, and any other mandatory information we collect at checkout.

If you do not provide this information, you will not be able to purchase services from us on our website or enter into a contract with us.

Optional information:

We also collect optional information from you, such as your phone number and any additional optional information at checkout. We also ask you if you would like to receive marketing communications from us. For further information, see 'Marketing communications' in this section below.

Processing your payment:

After you place an order on our website or application you will need to make payment for the services you have ordered. In order to process your payment we use a third party payment processor, your payment will be processed by the third party payment processor you choose to process your payment.

The third party payment processor chooses to process your payment collects, uses and processes your information, including payment information, in accordance with their privacy policies. You can access their privacy policies.

INFORMATION COLLECTED OR OBTAINED FROM THIRD PARTIES:

This section sets out how we obtain or collect information about you from third parties.

Information received from third parties:

Generally, we do receive information about you from third parties. The third parties from which we receive information about you will generally include Apple.

It is also possible that third parties with whom we have had no prior contact may provide us with information about you.

Information we obtain from third parties will generally be your name and contact details but will include any additional information about you which they provide to us.

WHERE WE RECEIVE INFORMATION ABOUT YOU IN ERROR:

If we receive information about you from a third party in error and/or we do not have a legal basis for processing that information, we will delete your information.

Information obtained by us from third parties:

In certain circumstances we will obtain information about you from certain publicly accessible sources, both EU and non-EU, such as online customer databases, business directories, social media, and websites.

DISCLOSURE AND ADDITIONAL USES OF YOUR INFORMATION:

This section sets out the circumstances in which will disclose information about you to third parties and any additional purposes for which we use your information.

Disclosure of your information to service providers:

We use third parties to provide us with services which are necessary to run our business or to assist us with running our business.

Your information will be shared with the service providers where necessary to provide you with the service you have requested, whether that is accessing our website, application, or ordering services from us.

Disclosure of Your Information to Other Third Parties:

We disclose your information to other third parties in specific circumstances, as set out below.

Providing information to third parties such as Apple: Apple collects information through our use of Apple Analytics on our website or application. Apple uses this information, including IP addresses and information from cookies, for a number of purposes, such as improving its Apple Analytics service. Information is shared with Apple on an aggregated and anonymised basis. To find out more about what information Apple collects, how it uses this information and how to control the information sent to Apple, please see the following page: <https://www.apple.com/legal/privacy/en-ww/>.

TRANSFER AND STORAGE OF YOUR INFORMATION:

Sharing your information with third parties, which are either related to or associated with the running of our business, where it is necessary for us to do so. These third parties include our accountants, advisors, affiliates, business partners, independent contractors. Further information on each of these third parties is set out below.

- **Accountants**
- **Advisors**
- **Affiliates**
- **Business partners**
- **Independent contractors**

DISCLOSURE AND USE OF YOUR INFORMATION FOR LEGAL REASONS:

If we suspect that criminal or potential criminal conduct has occurred, we will in certain circumstances need to contact an appropriate authority, such as the police. This could be the case, for instance, if we suspect that any fraud or a cybercrime has been committed or if we receive threats or malicious communications towards us or third parties.

We may need to use your information if we are involved in a dispute with you or a third party for example, either to resolve the dispute or as part of any mediation, arbitration or court resolution or similar process.

We will use and process your information in order to comply with legal obligations to which we are subject.

HOW LONG WE RETAIN YOUR INFORMATION:

This section sets out how long we retain your information. We have set out specific retention periods where possible. Where that has not been possible, we have set out the criteria we use to determine the retention period.

Retention periods:

Server log information: we retain information on our server logs for one year.

Order information: when you place an order for services, we retain that information for six years following the end of the financial year in which you place your order, in accordance with our legal obligation to keep records for tax purposes.

CRITERIA FOR DETERMINING RETENTION PERIODS:

In any other circumstances, we will retain your information for no longer than necessary, taking into account the following:

- The purpose and use of your information both now and in the future such as whether it is necessary to continue to store that information in order to continue to perform our obligations under a contract with you or to contact you in the future;
- Whether we have any legal obligation to continue to process your information;
- Whether we have any legal basis to continue to process your information;
- How valuable your information is;
- any relevant agreed industry practices on how long information should be retained;
- the levels of risk, cost, and liability involved with us continuing to hold the information;
- how hard it is to ensure that the information can be kept up to date and accurate; and
- Any relevant surrounding circumstances.

HOW WE SECURE YOUR INFORMATION:

We take appropriate technical and organisational measures to secure your information and to protect it against unauthorised or unlawful use and accidental loss or destruction, including:

- Only sharing and providing access to your information to the minimum extent necessary, subject to confidentiality restrictions where appropriate, and on an anonymised basis wherever possible;
- Using secure servers to store your information;
- verifying the identity of any individual who requests access to information prior to granting them access to information;

TRANSMISSION OF INFORMATION TO US BY EMAIL:

Transmission of information over the internet is not entirely secure, and if you submit any information to us over the internet, you do so entirely at your own risk.

We cannot be responsible for any costs, expenses, loss of profits, harm to reputation, damages, liabilities or any other form of loss or damage suffered by you as a result of your decision to transmit information to us by such means.

YOUR RIGHTS IN RELATION TO YOUR INFORMATION:

Subject to certain limitations on certain rights, you have the following rights in relation to your information, which you can exercise by sending an email to info@radon-flip.com:

- **To request access to your information** and information related to our use and processing of your information;
- **To request the correction or deletion** of your information;
- **To request that we restrict our use** of your information;
- **To object to the processing of your information for certain purposes;** and
- **To withdraw your consent to our use of your information** at any time where we rely on your consent to use or process that information. Please note that if you withdraw your consent, this will not affect the lawfulness of our use and processing of your information on the basis of your consent before the point in time when you withdraw your consent.
- **The right not to be subject to a decision based solely on automated processing, including profiling which produces legal effects concerning you or similarly significantly affects you.**

Verifying your identity where you request access to your information

Where you request access to your information, we are required by law to use all reasonable measures to verify your identity before doing so.

These measures are designed to protect your information and to reduce the risk of identity fraud, identity theft or general unauthorised access to your information.

HOW WE VERIFY YOUR IDENTITY:

Where we possess appropriate information about you on file, we will attempt to verify your identity using that information.

If it is not possible to identify you from such information, or if we have insufficient information about you, we may require original or certified copies of certain documentation in order to be able to verify your identity before we are able to provide you with access to your information.

We will be able to confirm the precise information we require to verify your identity in your specific circumstances if and when you make such a request.

YOUR RIGHT TO OBJECT TO THE PROCESSING OF YOUR INFORMATION FOR CERTAIN PURPOSES:

You have the following rights in relation to your information, which you may exercise in the same way as you may exercise by sending an email to info@radon-flip.com:

- To object to us using or processing your information where we use or process it in order to **carry out a task in the public interest or for our legitimate interests**, including 'profiling' based on any of these purposes; and
- To object to us using or processing your information for **direct marketing purposes**.

You may also exercise your right to object to us using or processing your information for direct marketing purposes by:

- **Clicking the unsubscribe link** contained at the bottom of any marketing email we send to you and following the instructions which appear in your browser following your clicking on that link;

- **Sending an email** to info@radon-flip.com, asking that we stop sending you marketing communications.

CHANGES TO OUR PRIVACY POLICY:

We update and amend our Privacy Policy from time to time.

Minor changes to our Privacy Policy:

Where we make minor changes to our Privacy Policy, we will update our Privacy Policy with a new effective date stated at the beginning of it. Our processing of your information will be governed by the practices set out in that new version of the Privacy Policy from its effective date onwards.

Major changes to our Privacy Policy or the purposes for which we process your information:

Where we make major changes to our Privacy Policy or intend to use your information for a new purpose or a different purpose than the purposes for which we originally collected it, we will notify you by email (where possible) or by posting a notice on our website or application.

We will provide you with information about the change in question and the purpose and any other relevant information before we use your information for that new purpose.

Wherever required, we will obtain your prior consent before using your information for a purpose that is different from the purposes for which we originally collected it.

CHILDREN'S PRIVACY:

We do not knowingly contact or collect information from persons under the age of 16. The website or application is not intended to solicit information of any kind from persons under the age of 16.

It is possible that we could receive information pertaining to persons under the age of 16 by the fraud or deception of a third party. If we are notified of this, as soon as we verify the information, we will where required by law to do so, immediately obtain the appropriate parental consent to use that information or, if we are unable to obtain such parental consent, we will delete the information from our servers. If you would like to notify us of our receipt of information about persons under the age of 16, please do so by sending an email to info@radon-flip.com.

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CONTACT INFORMATION:

If you have any questions regarding these terms and conditions of this website or application, please contact us by any of the following means;

Web: radon-flip.com

Email: info@radon-flip.com

Post: Business-center Meridio, Varshavskoe highway 125 building 5, 4th floor, Moscow, Russia.

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