

Privacy policy

Approved by Cannes Marines LLC

The personal data processing policy (hereinafter referred to as the Policy) has been developed in accordance with the current legislation. The policy defines the procedure for processing personal data and measures to ensure the security of personal data in Cannes Marines (hereinafter in the text - the Operator) in order to protect the rights and freedoms of a person and citizen in the processing of their personal data, including the protection of the rights to privacy, personal and family secrets. The operator is obliged to publish or otherwise provide unrestricted access to this Personal Data Processing Policy for all interested parties.

1. TERMS AND DEFINITIONS

The following basic concepts and terms are used in the Policy and have the following meanings.

- 1.1 Personal data subject - an individual who sends their own personal data to the Operator in order to gain access to the functionality of the Operator's Service;
- 1.2 Personal data - any information related directly or indirectly to a specific or identifiable individual (subject of personal data);
- 1.3 Processing of personal data - any action (operation) or a set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), retrieval, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion, destruction of personal data;
- 1.4 Automated processing of personal data - processing of personal data using computer technology;
- 1.5 Blocking personal data - temporary suspension of the processing of personal data (except when processing is necessary to clarify personal data);
- 1.6 Personal data information system - a set of personal data contained in databases and information technologies and technical means that ensure their processing;
- 1.7 Depersonalization of personal data - actions as a result of which it is impossible to determine, without the use of additional information, the ownership of personal data by a specific subject of personal data;
- 1.8 Providing of personal data - actions aimed at disclosing personal data to a certain person or a certain circle of persons;
- 1.9 Dissemination of personal data - actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or to familiarize with the personal data of an unlimited number of persons, including the disclosure of personal data in the media, placement in information and telecommunication networks or providing access to personal data in any other way;
- 1.10 Cross-border transfer of personal data - transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity;
- 1.11 Destruction of personal data - actions as a result of which it is impossible to restore the content of personal data in the information system of personal data and (or) as a result of which material carriers of personal data are destroyed.
- 1.12 Operator Service - a software package owned by the Operator, including a web interface located on the Internet at www.ffreez.com as well as the Freez software application.

1.13 User Agreement - an agreement posted on the Operator's website www.ffreez.com, concluded between the Operator and the Subject, which regulates the relationship between the Operator and the Subject for the use of the Operator's Service, namely, the service of the Internet resource www.ffreez.com, the Freez Application for electronic devices, aimed at providing the Subject with access to the tools of the Operator's Service. The User Agreement has the force of the Accession Agreement. The conclusion of the Connection Agreement between the Operator and the Subject is carried out by joining the Subject to the conditions determined by the Operator. The accession agreement is considered concluded from the date of completion of the registration of the Subject on the Operator's Website or in the Freez Application (from the date of successful Registration), without fail accompanied by the unconditional acceptance by the Subject of the terms of the User Agreement.

Terms used in the text of the Policy in the singular may imply the plural, and vice versa. Capitalized terms used in the text of the Policy have the same meaning as lowercase terms, and vice versa.

2. PRINCIPLES OF PERSONAL DATA PROCESSING

2.1 The operator processes personal data based on the following principles:

- legitimacy and fairness;
- limiting the processing of personal data to the achievement of specific, predetermined and legitimate purposes;
- preventing the processing of personal data that is incompatible with the purposes of collecting personal data;
- preventing the merger of databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other;
- processing only those items of personal data that meet the purposes of their processing;
- compliance of the content and scope of the processed personal data with the stated purposes of processing;
- preventing the processing of personal data that is excessive in relation to the stated purposes of their processing;
- ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of processing personal data;
- destruction or depersonalization of personal data upon reaching the goals of their processing or in case of loss of the need to achieve these goals, if it is impossible for the Operator to eliminate the committed violations of personal data, unless otherwise provided by the current legislation.

3. PURPOSES AND GROUNDS FOR PERSONAL DATA PROCESSING

3.1 The purpose of processing of personal data by the Operator is to provide the Subject with access to the functionality of the Operator's Service by creating an account of the Subject to ensure the fulfillment of the obligations of the Parties in accordance with the User Agreement, to ensure the fulfillment of obligations from other contractual relations established using the functionality of the Operator's Service, to protect the rights and legally protected interests of the Subject and the Operator, including the prevention of fraud, improving the quality of the Operator's Service, establishing feedback by the Operator with the Personal Data Subject, including, but not limited to, the distribution of materials and content of the site, the distribution of information / advertising / newsletters.

The legal grounds for the processing of personal data are, among others:

- User agreement concluded between the Operator and the Subject of personal data;
- consent to the processing of personal data provided by the Subject of personal data.

4. TERMS OF PROCESSING PERSONAL DATA

4.1 The operator processes personal data if there is at least one of the following conditions:

- the processing of personal data is carried out with the consent of the Subject of personal data to the processing of his personal data;
- the processing of personal data is necessary to achieve the goals provided for by an international treaty or the law, to carry out and fulfill the functions, powers and obligations assigned by the legislation to the Operator;
- the processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of government agency or official subject in accordance with the legislation on enforcement proceedings;
- the processing of personal data is necessary for the performance of an agreement to which the subject of personal data is a party or beneficiary or guarantor, as well as to conclude an agreement on the initiative of the subject of personal data or an agreement under which the subject of personal data will be the beneficiary or guarantor;
- the processing of personal data is necessary to exercise the rights and ensure the legitimate interests of the Operator or third parties, or to achieve socially significant goals, provided that the rights and freedoms of the subject of personal data are not violated;
- processing of personal data is carried out, access to which is provided by the subject of personal data or at their request to an unlimited number of persons (hereinafter - publicly available personal data);
- processing of personal data subject to publication or mandatory disclosure under federal law.

4.2 The transfer of personal data to third parties can only be carried out in cases established by the legislation, the contract with the participation of the Subject or with their consent.

4.3 The Operator has the right to entrust the processing of personal data to another person with the consent of the Personal Data Subject, unless otherwise provided by law, on the basis of an agreement concluded with this person. A person who processes personal data on behalf of the Operator is obliged to comply with the principles and rules for the processing of personal data.

5. COMPOUND OF PERSONAL DATA

5.1 Personal data authorized for processing under the Policy is provided by the Personal Data Subject (obtained by the Operator in an automated mode) by filling out registration and other forms on the Operator's website, the Subject's actions in the Freez Application, sending by the Subject to the Operator information containing the Subject's personal data and making payments for the services provided by the Operator.

5.2 In accordance with the Policy, the Operator guarantees the protection of personal data sent by the Subject to the email address freezaiapp@gmail.com.

5.3 Personal data provided by the Subject and/or received by the Operator automatically, include:

- last name, first name, patronymic;
- date and place of birth;
- contact phone numbers (mobile phone registered in the name of the Subject);
- e-mail address of the Subject;
- information necessary for the Subject to make payments for the use of the Operator's services;
- information about the history of the usage of the Operator's Service: quantity, cost and other information about the services of the Operator's Service received by the Subject.
- information about the participation of the Subject in the Operator's shares.
- photo and video filming of the Subject.

5.4 The Operator does not process personal data relating to race, nationality, political views, religious or philosophical beliefs, health, personal life of the subject of personal data.

6. CONSENT OF THE SUBJECT OF PERSONAL DATA TO THE PROCESSING OF HIS PERSONAL DATA

6.1 The subject of personal data decides to provide his personal data and agrees to its processing freely, of their own free will and in their own interest. Consent to the processing of personal data is provided by the Personal Data Subject or their representative by registering in the Freez Application.

6.2 The Operator assumes that the Subject provides reliable personal data and independently ensures the relevance of the information provided.

6.3 The operator has the right to verify the provided personal data. If there are irremovable doubts about the reliability and / or relevance of the personal data provided, the Operator has the right to deny the Subject access to the Operator's Service.

7. RIGHTS OF THE SUBJECT OF PERSONAL DATA

7.1 The subject of personal data has the right to receive information from the Operator regarding the processing of their personal data, if such right is not limited in accordance with federal law.

7.2 The subject of personal data has the right to demand from the Operator the clarification of their personal data, its blocking or destruction in cases provided for by contractual relations with the Operator, as well as in cases where personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose processing, as well as take legal measures to protect their rights.

In order to exercise the rights mentioned above, the subject sends to the Operator's e-mail address freezaiapp@gmail.com from the e-mail address provided to the Operator as the address of the Subject, the corresponding application, which must be processed by the Operator within the time period established by applicable law.

In case of changes in the mobile phone number (login) of the Subject, replacement of such in the system is carried out exclusively upon a written application of the Subject, accepted by the authorized representative of the Operator upon presentation by the Subject of the personal data of the ID.

7.3 The processing of personal data in order to promote goods, works, services on the market by making direct contacts with a potential consumer using means of communication, as well as for the purposes of political campaigning is allowed only

with the prior consent of the Personal Data Subject. The specified processing of personal data is recognized as being carried out without the prior consent of the Subject of personal data, unless the Operator proves that such consent has been received. The Operator is obliged to immediately stop, at the request of the Personal Data Subject, the processing of their personal data for the above purposes.

7.4 In accordance with the Policy, it is prohibited to make decisions based solely on automated processing of personal data that give rise to legal consequences in relation to the Personal Data Subject or otherwise affect their rights and legitimate interests, except as provided by federal law, or with the consent of the Personal Data Subject.

7.5 If the Personal Data Subject believes that the Operator is processing their personal data in violation of the law requirements or otherwise violates their rights and freedoms, they have the right to appeal against the actions or inaction of the Operator to the Authorized agency for the protection of the rights of personal data subjects or in court.

7.6 The subject of personal data has the right to protect their rights and legitimate interests, including compensation for losses and (or) compensation for moral damage judicially.

7.7 The subject has the right to withdraw their consent to the processing of personal data at any time, for which they send a written notification to the Operator to the email address at freezaiapp@gmail.com from the email address provided to the Operator as the address of the subject. At the same time, the subject acknowledges that the corresponding notification will mean they will terminate any contractual relationship with the Operator on the usage of the Operator's Service from the moment they receive the relevant notification. The risks of third parties accessing their own e-mail and performing legally significant actions on behalf of the subject of personal data are borne by the latter independently.

8. PRIVACY AND SECURITY OF PERSONAL DATA

8.1 The obligations of the Operator to ensure the confidentiality of personal data are paramount in the processing of the latter. The Operator undertakes not to disclose to third parties and not to distribute personal data without the consent of the Personal Data Subject, unless otherwise provided by federal law.

8.2 The security of Personal Data processed by the Operator is ensured by the implementation of legal, organizational and technical measures necessary to ensure the requirements of federal legislation in the field of personal data protection.

To prevent unauthorized access to personal data, the Operator applies the following organizational and technical measures:

- appointment of officials responsible for organizing the processing and protection of personal data;
- limiting the circle of persons having access to personal data;
- familiarization of the Subjects with the requirements of federal legislation and regulatory documents of the Operator for the processing and protection of personal data;
- organization of accounting, storage and circulation of information carriers;
- identification of threats to the security of personal data during their processing, the formation of threat models based on them, including during automated data processing;
- development of a personal data protection system based on the threat model, including in automated data processing;

- verification of the readiness and effectiveness of the use of information security tools,
including automated data processing;
- differentiation of user access to information resources, personalization and accounting for the access of the Operator's employees to software and hardware for information processing;
- registration and accounting of actions of users of personal data information systems;
- usage of anti-virus tools and means of restoring the personal data protection system;
- application, where necessary, of firewalls, intrusion detection, security analysis and cryptographic information protection;
- organization of access control to the territory of the Operator, security of premises with technical means of processing personal data.

8.3 The Operator's staff having access to the personal data of the Subject must be individually instructed on the process of working with personal data, familiarized with the legal regulation of the processing of personal data, internal local acts of the Operator and who has undertaken to maintain the confidentiality of this information.

8.4 The Operator is not responsible for the websites and software of third parties, to which the Subject can go through the links available when using the Operator's Service.

9. FINAL PROVISIONS

9.1 Other rights and obligations of the Operator, as an operator of personal data, are determined by federal legislation in the field of personal data. Officials of the Operator guilty of violating the rules governing the processing and protection of personal data, bear material, disciplinary, administrative, civil or criminal liability in accordance with the procedure established by the current legislation and local acts of the Operator.

9.2 The fact of acceptance and consent to the Policy is the providing by the Subject of Consent to the processing of personal data on the basis of and in accordance with this document.

9.3 The Operator's policy regarding the processing of personal data comes into force from the moment it is posted on the Operator's website www.ffreez.com and in the Freez Application. The Policy may be changed by the Operator at any time within the limits established by the current legislation. The subject independently monitors changes in the Policy and in case of disagreement with them, is obliged to stop using the Operator's Service and send a notice to the Operator about the termination of the User Agreement. If the changes in the Policy require the signing of a new version of the Consent of the subject to the processing of personal data, the Operator reserves the right to request said Consent. In case of disagreement and / or inaction of the Subject, the Operator has the right to refuse the usage of the Service / terminate the User Agreement.

9.4 The Operator's policy may supplement the provisions regarding the processing of personal data contained in the User Agreement. In the event of a conflict between the provisions of the User Agreement and the Policy, the Policy shall apply.

9.5 Control over the implementation of the requirements of the Policy is carried out by Cannes Marines.