

PRIVACY POLICY ON THE PROCESSING OF PERSONAL DATA

1. General Provisions

1.1. This Privacy Policy concerning the processing of personal data (the "Policy") defines the procedure for the processing of personal data and measures to ensure the security of personal data by the owner of the <https://pionergame.com> website (the "Operator").

1.2. The present Policy of the Operator in relation to personal data processing applies to all information that the Operator may obtain about the Users of the stated website.

1.3. Using the website and providing their personal data to the Operator (including anonymized), the User gives consent to the processing of personal data in accordance with this Policy, confirms they are familiar with all paragraphs of this Policy and accepts them without exceptions or reservations.

1.4. The User expresses their full agreement with the terms of the Policy by clicking the special buttons on the pages of the website when filling out the forms. In case of disagreement with any of the clauses of the Policy, the User is not allowed to use the website. Also, the User is forbidden to use the website if they have not reached the legal age when they have the right to enter into agreements with the website.

2. Definitions

2.1. Website - a website hosted at <https://pionergame.com> and administered by the Operator.

2.2. Processing of personal data refers to any action (operation) or a set of actions (operations) performed with or without the use of automated means involving personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.3. Operator – LLC «GFAGAMES» (Taxpayer Personal Identification Number: 7708397638, Main State Registration Number: 1217700358182), independently or collectively with other parties organizes and (or) performs processing of personal data, as well as determines the purpose of personal data processing, the range of personal data to be processed, the actions (operations) performed with personal data.

2.4. Personal data - any information (including anonymized) relating directly or indirectly to a specific or identifiable user of the website.

2.5. User - a visitor of the website willing to use and/or using the services of the Operator by means of the website.

2.6. Services - information services provided by the Operator to the Users via the website.

2.7. Cookie file is a file stored on the User's computer or mobile device, which the web client or web browser sends to the web server each time it makes an HTTP request to open a page of the corresponding site.

2.8. IP address is a unique digital address of the User's device in the computer network.

3. Personal data of the User processed by the Operator

3.1. The Policy applies to data collected during the User's visit to the website. Data is collected each time the website is accessed. The following User data can be collected while visiting the website:

- IP address. The IP address statistics of the User is used to identify and solve technical problems, control the legality of the transactions;
- information about the operating system and browser software used to access the website;
- details of the User's visits to the Website, including, but not limited to, traffic data, location data, network logs, and information about the resources visited;
- cookies. This data is used to personalize content, customize and measure advertising, ensure the safety of the website and its Users, and improve and simplify the website visit process. The Operator processes anonymized data about the User if it is allowed in the settings of the User's browser (cookies saving and JavaScript technology are enabled). The operator does not use cookies to store personal information or disclose information to third parties. Disabling cookies may prevent you from accessing parts of the site that require authorization. By continuing to browse the pages of the website, the User accepts the terms of the Cookie Policy and agrees to the sharing of data about the User obtained through the use of cookies with third parties and the receipt of marketing materials. If the User does not accept the terms of the Policy, the User may block cookies (all or some of them) by selecting the appropriate option in their browser or discontinue browsing the website pages.

3.2. This Policy applies only to the services of the website. The Operator does not control and is not responsible for the websites of third parties accessible by the User via the links available on the website.

4. Purposes of personal data processing

4.1. The Operator collects and stores only the data that is necessary to provide the Services to Users.

4.2. Purposes of personal data processing:

4.2.1. The provision of the Services and the ability to use the Web site by Users.

4.2.2. Targeting promotional materials

4.2.3. Providing the User with access to the information contained on the website.

4.2.4. Improving the quality of the website, its usability, development of new functions in order to provide the Services.

4.2.5. Promotion and advertisement on the market of the Services provided by the Operator through the website.

4.2.6. Establishment of feedback with the User, if necessary, including sending notifications (including push notifications), requests, and information related to the use of the website.

4.2.7. Conducting statistics and other research on the basis of impersonal data.

5. The procedure and conditions for the collection, storage, transfer, and other processing of personal data

5.1. Security of personal data processed by the Operator is ensured by implementing legal, organizational, and technical measures necessary for the full realization of the requirements of current legislation in the field of personal data protection.

5.2. Processing of personal data of the User is carried out by any lawful means, including in information systems of personal data, with or without the use of automated means.

5.3. The User's personal information is kept confidential. The operator ensures the safety of personal data and takes all possible measures to exclude access to personal data by unauthorized persons.

5.4. Only the Operator has access to personal data. In order to ensure the confidentiality of information and protection of personal data, the Operator shall take all measures necessary to prevent unauthorized access.

5.5. The period of personal data processing lasts for the duration of this Policy. The User can withdraw their consent to the processing of personal data at any time by sending a notification letter to the Operator via e-mail legal@gfagames.com with the subject "Withdrawal of consent to the processing of personal data".

5.6. Deletion and destruction of personal data are carried out in the order stipulated by the applicable law. Deletion and destruction of personal data are performed:

5.6.1. in cases provided by law;

5.6.2. at the request of the User, public authority, or court;

5.6.3. upon expiration of the retention period;

5.6.4. upon expiration of the need.

6. Responsibility

6.1. The Privacy Policy does not regulate and the Operator is not responsible for the receipt, storage, processing, use, and disclosure of the User's personal data by third parties not owned or managed by the Operator, and individuals who are not employees/partners of the Operator, even if the User accessed the websites of these parties' products or services through the website or newsletter.

6.2. The User acknowledges that in case of the User's negligent attitude to the security and protection of their personal data, third parties can get unauthorized access to the User's personal and other data. In this case, the Operator is not responsible for damages caused to the User and/or third parties by such access.

6.3. In case of loss or disclosure of confidential information, the Operator is not liable if the information:

6.3.1. became public before its loss or disclosure;

6.3.2. was received from a third party prior to its receipt by the Operator;

6.3.3. was disclosed with the User's consent.

6.4. The Operator is not responsible for damages or losses incurred by the User and/or third parties as a result of misunderstanding or misunderstanding the terms of the Policy, instructions, or directions on how to use the website, on the order of data posting and other technical issues.

7. Concluding Provisions

7.1. The user can get any explanations on questions of interest concerning the processing of their personal data by contacting the Operator by e-mail legal@gfagames.com.

7.2. The Operator has the right to make changes to this Policy at any time and at their discretion. When changes are made in the current edition, the date of the last update shall be specified. The new version of the Policy comes into effect from the moment it is posted on the website unless otherwise provided by the new version of the Policy.

7.3. The current version of the Policy can be found on the pages of the website.

7.4. This Policy applies only to the Website.

7.5. In case any provision of this Policy, including any sentence, clause or part thereof, is found to be contrary to law or invalid, the remaining provisions which are not

contrary to law shall not be affected, they shall remain in full force and effect, and any invalid provision or clause which cannot be executed without further action by the Parties shall be deemed amended, corrected to the extent necessary to make it valid and enforceable.

7.6. The Operator does not accept proposals from Users regarding changes to this Policy.

7.7. All disputes between the parties shall be resolved through negotiations. The claim procedure for resolving disputes is mandatory, the period of response to the claim is ten (10) working days.

7.8. If an agreement cannot be reached through negotiations, disputes shall be resolved by court proceedings based on the location of the Operator, applying the rules of the substantive and procedural law of the Russian Federation.

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