

# Browser Privacy Policy

Last updated on \_\_\_\_

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This privacy policy (hereinafter referred to as the "Policy") is created in accordance with the requirements of the Federal Law of Russian Federation No.152, "On Personal Information" and regulates the relationship between ("*Company*", "*we*", "*us*", "*our*") and you ("*User*", "*you*", "*your*"), it also regulates the processing of your personal information, measures to protect it, and ensure the security of personal information collected by the Company when the User interacts with the program for mobile devices on Android and iOS platforms (hereinafter the "Software") or the company's Website.

The Company puts the Users' privacy above all, honors human and civil rights and freedoms during the collection and processing of their personal information. This is why we want to inform you that in order to achieve our legitimate interests, the Company may use your personal information. In such cases, the Company will maintain a balance between the protection of personal information and the legitimate interests of the Company.

This policy can be accessed from the Internet via (hereinafter the "Website") and applies to all information that the Company may receive about users of the Software.

## Definitions:

**Company**, the company's representative or affiliate that is involved in developing the Program and posting this policy on its website. The legal address of the company.

**User**. A person who interacts with the Company's software (Browser) or Website (<https://sbrowser.ru>). Any person whose personal information is collected and used by the Company in accordance with the applicable legislation, for example, **you**.

**Software**. Software means Browser app for Android and iOS operating systems, which is provided by the Company free of charge through the Google Play Store and Apple App Store.

**Website**. <https://sbrowser.ru> - Internet page devoted to Software, made to inform Users about the Software.

**Products**. Software, Website, and any other products of the company combined.

## General terms

When you use our Products, the Company collects and uses your personal information in certain ways. In some cases the Company may also disclose your personal information to third parties.

The purpose of this policy is to inform the User about the personal information the Company collects about him, how it is used, stored, and protected. Protection of the User's personal information is extremely important for the Company, therefore, when you use our Software, we do our best to inform you about the following:

- On what legal basis the Company collects and uses your personal information;
- How does the Company collect and use your personal information when you interact with our Products;
- What are the Company's obligations towards your personal information;
- How can you limit the amount of personal information the Company collects about you;
- Your rights under this privacy policy.

## Legal basis for the personal information collection

To collect and process your personal information the Company needs to have a legal basis sufficient for this. Therefore we only collect your personal information for the following purposes:

- to fulfill our contract with the User. Fulfilling the contract means maintaining the availability of our Products (for example, enabling you to use Browser);
- to comply with our obligations under applicable legislation;
- to ensure the legitimate interests of the Company. In this case, the processing of personal information should not have a significant impact on the interests of the User, User's rights, and freedoms.

The company may collect and use your personal information to ensure its legitimate interests to:

- monitor statistics on the interaction of Users with our Products;
- update, diagnose, extend functionality, or otherwise improve the Products to provide you with a better experience;
- promote other products of our Company or other companies that might interest you;
- inquire additional information under the requirements of applicable legislation, the Company has a right to request your additional consent for the processing of your personal information.

The company collects and uses only the necessary minimum of your personal information to achieve certain goals. Such goals may include the following:

- enabling Users to get acknowledged with our Products;
- allowing Users to create and use a personal profile in our Products;
- communication between you and the Company, sending you notifications and replies from technical support, informing you about product updates, giving additional information on the Company's Products, fulfilling our contract with you, as well as handling other information related to our Products;
- improving User experience;
- creating new products;
- protecting your and the Company's rights;
- collecting and processing statistical data, big data, and other research goals.

## **What personal information we collect**

The Company collects only the necessary minimum of personal information required for the proper operation of our Products. Personal information collected by the Company can be divided into several categories:

**Information about User's device** (personal computer, laptop, mobile, or another device) automatically collected by the Company when the User accesses the Products:

- IP address;
- operating system;
- device name and characteristics;
- language settings;
- your browser and browser ID;
- other browser information: HTTP-headers, cookies, and similar data;
- device's geolocation;
- information about the mobile or Internet service provider;
- installed software and hardware;
- timestamps when you access our Websites and/or Products;

- the way you interact with our Products;
- the version of a Product.

The company may use this information to:

- provide the basic functionality of the Products;
- troubleshoot and fix errors that occur when using the Products;
- update and improve Products;
- notify you about Product updates;
- personalize interaction with Products;
- analyze and collect statistics of interaction.

The Company may also collect other personal information that the User voluntarily chooses to provide through the Products. Such information **provided by the User** may include:

- first and last name;
- national ID or passport number;
- passwords;
- email addresses;
- physical addresses;
- payment methods;
- other personal information the User chooses to provide.

The User provides the Company with this information through the Company's Products, such as Browser. The Company does not use this information to identify the User in any form. This information is stored on the Company's servers and enables Users to autocomplete online forms, speed up payment and registration processes, etc. The User can refuse to provide this information without significant consequences.

The User also provides the Company with his personal information **when contacting the support**. The Company can use this information to satisfy the User's request. The Company may ask for additional information required to satisfy the User's request.

**Cookies** and other similar tracking technologies.

The Company may collect information obtained from cookies and other similar technologies for analytical purposes, to improve the quality of Products, and to display personalized ads.

Cookies are strings of textual information created by our server and stored on the User's computer, in his browser. Cookies are used to identify a User in certain ways. Most browsers are set to accept cookies by default. The User can always choose to delete or refuse to accept cookies, however, this may affect the work of the Products. To find out exactly how the refusal to provide personal information may affect the operation of the products, see the section ["Your rights towards your personal information"](#).

There are several types of cookies, each may be used for a specific purpose:

**Essential cookies.** Cookies in this category are required for our products to work. They are used, for example, to enter the secure areas of our products (like a user profile).

**Service cookies.** Such cookies allow us to determine and count the number of people who use or interact with our Products. These cookies help us analyze and improve our products, track statistics, troubleshoot, and solve problems as soon as they arise.

**Functional cookies.** These cookies are required for personalized functions, notifications, and content, to link all personal information about the User together, as well as remember your settings (for example, regional or language settings).

Please note that third parties may use their own cookies and information stored in them about your interaction with our and other Products and Websites. We have no control over cookies used by third parties, such as advertising or traffic analytics services. We are only responsible for the cookies we use.

Any information collected by the Company is stored in a depersonalized form and does not allow the User to be identified as a physical person. The Company will not use personal information collected from Users for any purposes other than the ones described in this Privacy Policy.

## **Who else has access to your personal information**

The Company reserves a right to involve partners in order to enable you to use our Products. We may disclose information about your interaction with our Products to third parties such as:

- Affiliated companies, including any parent, subsidiary, joint venture companies, in cases of partnership, merger, sale of company assets, financing, acquisition of all or a portion of our company by other businesses, or during the acquisition of another business by our company;
- Bodies, such as law enforcement, central or local executive authorities, courts, as well as other official or state bodies, at the request of which the Company is obliged to provide information in accordance with the applicable legislation.

If this is dictated by our contract with you, the Company will only share your personal information with companies that have accepted sufficient security measures to protect your personal information, comparable with the measures in our Company. We will not disclose your personal information to any third party other than the ones specified in this Policy.

## **Where your personal information is stored and processed**

Your personal information will be stored on the territory of the Russian Federation.

If you are a resident of the Russian Federation, the Company, following the legislation will store your personal information on the territory of the Russian Federation.

If you are a resident of another country, by accepting the terms of this Policy, you give your explicit and unambiguous consent to transfer your personal information outside the jurisdiction of your country of residence to the jurisdiction of the Russian Federation.

### **How long your personal information will be stored**

The company will keep your personal information for as long as it is necessary in order to fulfill the contract with the User, satisfy the Company's business interests, or comply with the requirements of laws and regulations.

### **How we protect your personal information**

Your personal information is collected and processed automatically. It is collected and processed using computer technologies without the participation of the Company's employees. This means that only the employees who need your personal information to perform their duties have access to your personal information. The Company takes special technical and internal measures mandatory for all Company employees to protect the personal information of Users.

In addition to internal and technical security measures, the Company also protects the personal information of Users from unauthorized access, processing, deletion, modification, and other illegal use by third parties.

However, despite all measures taken, the Company cannot guarantee absolute protection of Users' personal information from interception after it leaves you and before it reaches us. We cannot guarantee that hackers, cybercriminals, or other unauthorized third parties will not be able to defeat our security, and improperly collect, access, steal, or modify your personal information. You should understand that the transmission of information on the internet is at your own risk. The Company recommends you to access our Products only from a secure environment.

If you believe that your personal information has been compromised in any way, please contact us using the contact information provided in the "[Questions and suggestions](#)" section below.

### **Your rights towards your personal information**

By agreeing to this Privacy Policy, you give your explicit and unambiguous consent for the processing of your personal information by the Company. However, consent is voluntary. We hereby inform you, and you confirm that you have no obligation to provide us with any personal information when you use our Products, that your consent is based solely on your free will. However, you acknowledge that if you refuse to provide personal information, we will not be able to guarantee the correct operation of our Products.

If applicable legislation allows, you have a right to:

- Access your personal information collected and processed by the Company under this Policy;
- Request complete or partial deletion of your personal information collected by the Company;
- Refuse or revoke your consent for collection of your personal information;
- Request to limit the collection and/or processing of your personal information collected by the Company;
- Request a copy of your personal information;
- Other rights according to the applicable legislation.

You, as a User, have a right to refuse to provide your personal information to the Company or request its complete or partial deletion at any time, however, in this case, we cannot guarantee the correct work of our Products, for example, some websites may be displayed incorrectly. If you choose to do so, the Company will not collect your personal information any more, however, we cannot guarantee that other websites will not continue to collect your personal information in order to analyze their products, improve the quality of their content, etc.

You can also refuse to provide the Company or third parties with certain types of personal information by changing your browser settings, including Browser settings.

To contact the Company about the way we use your personal information, you can use the contact information specified in the "[Questions and suggestions](#)" section below.

### **Updates to this Policy**

The Company reserves a right to make changes to this policy in cases including, but not limited to when the changes are dictated by applicable legislation or when Company Products are updated.

We will include the updated version of the policy in all of our Products, indicating the date of the change. The updated version of the Policy comes into force as soon as it becomes accessible by Users.

### **Questions and suggestions**

The Company welcomes any questions and suggestions from Users concerning this Privacy Policy. Please send them to [company@email](mailto:company@email) or via the feedback form at <https://sbrowser.com/support.html>.

The company monitors all incoming requests concerning personal information and processes them in accordance with the applicable legislation. The company will give a written response to a User's submission within 30 days.