

1. About us

Just – People in places is managed by LLC Just. The company is registered with the address:

394018 , Russian Federation , Voronezh Region ,

Voronezh City , Kirova St. , building # 11 , office 211

2. INFORMATION WE COLLECT

It goes without saying, we can't help you chat, meet new people, and connect with them without some information about you, such as basic profile details and the types of people you'd like to meet. We also collect information generated as you use our services, for example access logs, as well as information from third parties, like when you access our services through a social media account. If you want additional info, we go into more detail below.

Information you give us

You choose to give us certain information when using our services. This includes:

- When you create an account, you provide us with at least your login credentials, as well as some basic details necessary for the service to work, such as your gender and date of birth.
- When you complete your profile, you can share with us additional information, such as details on your personality, lifestyle, interests and other details about you, as well as content such as photos and videos. To add certain content, like pictures or videos, you may allow us to access your camera or photo album. Some of the information you choose to provide us may be considered "special" or "sensitive" in certain jurisdictions, for example your sex, social status, date of birth, hometown, education, workplace, social website profile links: Vk.com, Facebook.com, Twitter.com, also a photo for the adding of a certain contact, for example a photo, you can grant us access to your camera or photo gallery, by providing this information to us, you agree to it being processed by us.
- • In order to find out which of your friends in VK.com is registered in Just, and also invite these people to the application, we ask you for

permission to access your VK profile. By providing this information to us, you agree to it being processed by us.

- In order to find out which of your contacts are registered in Just, and also invite these people to the application, we request permission from you to access your contacts. By providing this information to us, you agree to it being processed by us.
- In order to find out which of the other users are in the same place, as well as other places in the city and the world, we ask you for permission to access the geolocation or Wi-Fi connection.
- Of course, we ALSO process your chats with other users as well as the content you publish, as part of the operation of the services.

Information we receive from others

In addition to the information you provide us directly, we receive information about you from others, including:

- **Other Users**
Other users may provide information about you as they use our services. For instance, we may collect information about you from other users if they contact us about you.
- **Social Media**
You may be able to use your social media login (such as Facebook, Vk or Twitter Login) to create and log into your Tinder account. This saves you from having to remember yet another user name and password and allows you to share some information from your social media account with us.
- **Other Partners**
We may receive info about you from our partners, for instance where Tinder ads are published on a partner's websites and platforms (in which case they may pass along details on a campaign's success).

Information collected when you use our services

When you use our services, we collect information about which features you've used, how you've used them and the devices you use to access our services. See below for more details:

- **Usage Information**

We collect information about your activity on our services, for instance how you use them (e.g., date and time you logged in, features you've been using, searches, clicks and pages which have been shown to you, referring webpage address, advertising that you click on) and how you interact with other users (e.g., users you connect and interact with, time and date of your exchanges, number of messages you send and receive).

- **Device information**

We collect information from and about the device(s) you use to access our services, including:

- hardware and software information such as IP address, device ID and type, device-specific and apps settings and characteristics, app crashes, advertising IDs (such as Google's AAID and Apple's IDFA, both of which are randomly generated numbers that you can reset by going into your device's settings), browser type, version and language, operating system, time zones, identifiers associated with cookies or other technologies that may uniquely identify your device or browser (e.g., IMEI/UDID and MAC address);
- information on your wireless and mobile network connection, like your service provider and signal strength;
- information on device sensors such as accelerometers, gyroscopes and compasses.

- **Other information with your consent**

If you give us permission, we can collect your precise geolocation (latitude and longitude) through various means, depending on the service and device you're using, including GPS, Bluetooth or Wi-Fi connections. The collection of your geolocation may occur in the background even when you aren't using the services if the permission you gave us expressly permits such collection. If you decline permission for us to collect your geolocation, we will not collect it.

3. HOW WE USE INFORMATION

The main reason we use your information is to deliver and improve our services. Additionally, we use your info to help keep you safe. Read on for a more detailed explanation of the various reasons we use your information, together with practical examples.

To administer your account and provide our services to you

- Create and manage your account
- Provide you with customer support and respond to your requests

To help you connect with other users

- we analyze, in what place you are located to help you find an interesting person to have a chat with and get to know
- Show users' profiles to one another

To improve our services and develop new ones

- Conduct research and analysis of users' behavior to improve our services and content (for instance, we may decide to change the look and feel or even substantially modify a given feature based on users' behavior)
- Develop new features (for example, we may decide to build a new interests-based feature further to requests received from users).

To prevent, detect and fight fraud or other illegal or unauthorized activities

- Address ongoing or alleged misbehavior on and off-platform
- Perform data analysis to better understand and design countermeasures against these activities
- Retain data related to fraudulent activities to prevent against recurrences

To ensure legal compliance

- Comply with legal requirements
- Assist law enforcement
- Enforce or exercise our rights, for example our Terms

To process your information as described above, we rely on the following legal bases:

- *Provide our service to you:* Most of the time, the reason we process your information is to perform the contract that you have with us. For instance, as you go about using our service to chat with one another,

we use your information to maintain your account and your profile, to make it viewable to other users.

- *Legitimate interests:* We may use your information where we have legitimate interests to do so. For instance, we analyze users' behavior on our services to continuously improve our offerings, we suggest offers we think might interest you, and we process information for administrative, fraud detection and other legal purposes.
- *Consent:* From time to time, we may ask for your consent to use your information for certain specific reasons. You may withdraw your consent at any time by contacting us at the address provided at the end of this Privacy Policy.

4. HOW WE SHARE INFORMATION

Since our goal is to help you make chat, meet new people, and connect with them, the main sharing of users' information is, of course, with other users. Read on for more details about how your information is shared with others and the provider of the services.

- *With other users*

You share information with other users when you voluntarily disclose information on the service (including your public profile). Please be careful with your information and make sure that the content you share is stuff that you're comfortable being publically viewable since neither you nor we can control what others do with your information once you share it.

If you choose to limit the audience for all or part of your profile or for certain content or information about you, then it will be visible according to your settings.

- *With our service providers and partners*

We use third parties to help us operate and improve our services. These third parties assist us with various tasks, including data hosting and maintenance, analytics, marketing and advertising.

We may also share information with partners who distribute and assist us in advertising our services. For instance, we may share limited

information on you in hashed, non-human readable form to advertising partners.

We follow a strict vetting process prior to engaging any service provider or working with any partner. All of our service providers and partners must agree to strict confidentiality obligations.

- *When required by law*

We may disclose your information if reasonably necessary: (i) to comply with a legal process, such as a court order, subpoena or search warrant, government / law enforcement investigation or other legal requirements; (ii) to assist in the prevention or detection of crime (subject in each case to applicable law); or (iii) to protect the safety of any person.

- *To enforce legal rights*

We may also share information: (i) if disclosure would mitigate our liability in an actual or threatened lawsuit; (ii) as necessary to protect our legal rights and legal rights of our users, business partners or other interested parties; (iii) to enforce our agreements with you; and (iv) to investigate, prevent, or take other action regarding illegal activity, suspected fraud or other wrongdoing.

- *With your consent or at your request*

We may ask for your consent to share your information with third parties. In any such case, we will make it clear why we want to share the information.

We may use and share non-personal information (meaning information that, by itself, does not identify who you are such as device information, general demographics, general behavioral data, geolocation in de-identified form), as well as personal information in hashed, non-human readable form, under any of the above circumstances. We may combine this information with additional non-personal information or personal information in hashed, non-human readable form collected from other sources.

5. CROSS-BORDER DATA TRANSFERS

Sharing of information laid out in Section 4 sometimes involves cross-border data transfers, for instance to the United States of America and other jurisdictions. As an example, where the service allows for users to be located in the European Economic Area (“EEA”), their personal information is transferred to countries outside of the EEA. We use standard contract clauses approved by the European Commission or other suitable safeguard to permit data transfers from the EEA to other countries. Standard contractual clauses are commitments between companies transferring personal data, binding them to protect the privacy and security of your data

6. YOUR RIGHTS

We want you to be in control of your information, so we have provided you with the following tools:

- Access / Update tools in the service. Tools and account settings that help you to access, rectify or delete information that you provided to us and that’s associated with your account directly within the service. If you have any question on those tools and settings, please contact our customer care team for help support@just.ru.com
- Device permissions. Mobile platforms have permission systems for specific types of device data and notifications, such as phone book and location services as well as push notifications. You can change your settings on your device to either consent or oppose the collection of the corresponding information or the display of the corresponding notifications. Of course, if you do that, certain services may lose full functionality.
- Deletion. You can delete your account by using the corresponding functionality directly on the service.

We want you to be aware of your privacy rights. Here are a few key points to remember:

- Reviewing your information. Applicable privacy laws may give you the right to review the personal information we keep about you (depending on the jurisdiction, this may be called right of access, right of portability or variations of those terms). You can request a copy of your personal

information by putting in such a request please contact the admin using this email admin@just.ru.com

- Updating your information. If you believe that the information we hold about you is inaccurate or that we are no longer entitled to use it and want to request its rectification, deletion or object to its processing, please contact us please contact the admin using this email admin@just.ru.com

For your protection and the protection of all of our users, we may ask you to provide proof of identity before we can answer the above requests.

Keep in mind, we may reject requests for certain reasons, including if the request is unlawful or if it may infringe on trade secrets or intellectual property or the privacy of another user. If you wish to receive information relating to another user, such as a copy of any messages you received from him or her through our service, the other user will have to contact our Privacy Officer to provide their written consent before the information is released.

Also, we may not be able to accommodate certain requests to object to the processing of personal information, notably where such requests would not allow us to provide our service to you anymore. For instance, we cannot provide our service if we do not have your date of birth.

- Uninstall. You can stop all information collection by an app by uninstalling it using the standard uninstall process for your device. If you uninstall the app from your mobile device, the unique identifier associated with your device will continue to be stored. If you re-install the application on the same mobile device, we will be able to re-associate this identifier to your previous transactions and activities.
- Accountability. In certain countries, including in the European Union, you have a right to lodge a complaint with the appropriate data protection authority if you have concerns about how we process your personal information. The data protection authority you can lodge a complaint with notably may be that of your habitual residence, where you work or where we are established.

7. RESIDENTS OF RUSSIAN FEDERATION

In case of disputes and disagreements, related to the compliance of these rules , you and LLC Just together will do the best to resolve it through negotiations. Disagreements which were not resolved through negotiations will have to be solved according to the Russian law.

8. HOW WE PROTECT YOUR INFORMATION

We work hard to protect you from unauthorized access to or alteration, disclosure or destruction of your personal information. As with all technology companies, although we take steps to secure your information, we do not promise, and you should not expect, that your personal information will always remain secure.

We regularly monitor our systems for possible vulnerabilities and attacks and regularly review our information collection, storage and processing practices to update our physical, technical and organizational security measures.

We may suspend your use of all or part of the services without notice if we suspect or detect any breach of security. If you believe that your account or information is no longer secure, please notify us immediately through our customer care support@just.ru.com

9. HOW LONG WE RETAIN YOUR INFORMATION

We keep your personal information only as long as we need it for legitimate business purposes and as permitted by applicable law. To protect the safety and security of our users on and off our services, we implement a safety retention window of three months following account deletion.

In practice, we delete or anonymize your information upon deletion of your account (following the safety retention window):

1. we must keep it to comply with applicable law (for instance, some “traffic data” is kept for one year to comply with statutory data retention obligations);
2. we must keep it to evidence our compliance with applicable law (for instance, records of consents to our Terms, Privacy Policy and other similar consents are kept for five years);
3. there is an outstanding issue, claim or dispute requiring us to keep the relevant information until it is resolved; or
4. the information must be kept for our legitimate business interests, such as fraud prevention and enhancing users' safety and security. For example, information may need to be kept to prevent a user who was banned for unsafe behavior or security incidents from opening a new account.

Keep in mind that even though our systems are designed to carry out data deletion processes according to the above guidelines, we cannot promise that all data will be deleted within a specific timeframe due to technical constraints.

10. PRIVACY POLICY CHANGES

Because we're always looking for new and innovative ways to help you chat , get to know and meet new people, this policy may change over time. We will notify you before any material changes take effect so that you have time to review the changes.

11. HOW TO CONTACT US

If you have questions about this Privacy Policy, here's how you can reach us by mail:

394018, Russian Federation, Voronezh Region,

Voronezh city, Kirova St., building #11, office 211

You can also contact us through email: admin@just.ru.com.