



Privacy Policy

The priority of “UDS” is users' interests. This principle is the basis of all the decisions we make including while collecting and processing your personal data.

We tried to make the following policy as clear and transparent as possible. Our goal is that you, as a “UDS” user, always feel confident when it comes to privacy.

Maintaining your confidence is also one of the “UDS” priorities. The principles we use for your privacy protection are provided below.

As amended on 14/11/18.

Collected data

The “UDS” Privacy Policy is applicable to all “UDS” account holders, “UDS” app users and website visitors (hereinafter referred to as users of Services). If you are concerned and not comfortable with the very fact of providing us with your information, possibility of displaying this information in “UDS” services or use of this information by other means in accordance with this Privacy Policy and User Agreement, you should not become a user of “UDS” Services and visit our website. Personal data is collected by the ways given below.

Registration and logging into Services

When you create a “UDS” account, you provide us with personal information including your name and password. You can also choose to add a phone number or email to your account. Even if you aren't signed in, you might choose to provide us with information like an email address to receive updates about our services.

For creating the “UDS” account you should provide at least the following details: name, last name, phone number, email address, registration address, and password. During the registration process, you can specify other information (e.g. sex, region, city, date of birth). This additional information is used to provide you with personalized services, such as display of profiles, updates, and content in your native language, recommendations of places near you which may be interesting for you. All this can be displayed in a “UDS” profile and is browsable for other Users and Clients (owners of “UDS App” CRM systems). You should agree that when creating your account, you authorize “UDS” to use the provided data in accordance with the User Agreement.

When you're not signed in to an account, we store the information that we collect with unique identifiers tied to browsers, applications, and devices you're using. This helps us do things such as maintain your settings and other data across browsing sessions.

When you're signed in, we also collect information that we store with your account, which we treat as personal information.

When you've signed out the App account, you can manage information associated with your browser or device, for example, ad settings.

Data collection purposes

We consider it necessary to notify you that in order to validate bills by means of “UDS”, Clients have the ability to integrate the “UDS App” Application with third-party services. In this case under the cashless payment scheme, we, as a Service, pass interaction further to third-party services that can access your billing information. The “UDS” Service itself does not collect information about the Users' bank cards.

“UDS” collects information to provide better services to all our users – from figuring out basic stuff such as which language you speak to more complex things like which places, shops and

links you might like. The information we collect depends on how you use the App and how you manage your privacy controls.

We may also collect information about you from trusted partners, including partners who provide us with information about potential customers of our App, and security partners who provide us with information to protect against abuse. We also receive information from advertisers to provide advertising and research services on their behalf.

We use various technologies to collect and store information, including cookies, pixel tags, local storage, such as browser web storage or application data caches, databases and server logs.

We use your information to deliver our services, such as processing the terms you search. We also use your information to track outages, ensure that our services are working as intended and optimize them.

We do not give your email address or other personal data (for example, your phone number or name) to advertisers without your consent, or instructions, except in cases provided by this privacy policy. We use information that we collect, such as your email address, to interact with you directly. For example, we may send you a notification if we detect suspicious activity, such as an attempt to sign in to your account from an unusual location. Or we may let you know about upcoming changes or improvements to our service. And if you contact us, we'll keep a record of your request in order to help solve any issues you might be facing. We use the information to help improve the safety and reliability of our service. This includes detecting, preventing, and responding to fraud and risks that could harm the App and our users.

Backoffice account details

You can add the following information to your account: phone number, Skype login, mailbox address, profile picture.

We also collect the content that you create, upload or receive from others when using our product. This includes things such as emails, documents, and spreadsheets you create and comments that you make, etc.

We collect information about browsers and devices that you use to access App Services. This helps us provide features such as automatic App updates.

The information that we collect includes unique identifiers, types, and settings of the browser and device, operating system, mobile network information (including operator name and phone number) and App version number. We also collect information about the interaction of your apps, browsers, and devices with our services, including IP address, crash reports, system activity, and the date, time and referrer URL of your request.

We collect this information when an App service on your device contacts our servers, for example, when you install the App from the Play Store/AppStore or when a service checks for automatic updates.

In the account settings, you can adjust the amount of personal data provided, as well as make changes. Moreover, you can control what other users of the App see about you across the service. A personal account allows you to manage information associated with specific products and your contact information, such as your name, gender, email, phone number, etc.

Your location information

We collect information about your location when you use the App, which helps us offer features such as displaying discounts in cafes or shops near you.

Your location can be determined with maximum accuracy in accordance with your device capabilities and other factors like GPS, IP address, MAC address, information about things near your device. The types of location data depend in part on your device and account settings. For example, you can turn your device's location on or off and turn on location history using the device's settings app.

Data transfer to third parties

“UDS” protects your personal data and may disclose it to third parties only in the following cases established in this Policy:

1. with your consent or direction;
2. when it is required by your instructions;
3. when it is reasonably necessary to provide services and functionality to you in cases and purposes specified in this Policy. For example, we transfer your location data, a unique identifier to Google services, when using the map provided by this service, so that Google can estimate the distance to the selected company;
4. in accordance with legislative requirements;
5. to enforce the terms of “UDS” User Agreement or to protect the rights, property or safety of “UDS”, Participants or the public.

In order to study tendencies of using our service, we can provide your personal data to other persons, such as Clients (owners of CRM systems of “UDS App”), third-party supporting services (for example, google maps, SDK of various social networks for authorization), developers and right holders. In this case, all the information is aggregated and depersonalized, provided for statistical purposes. We also allow specific partners to collect information from your browser or device for advertising and measurement purposes using their own cookies or similar technologies. Such collection of information is regulated by the Privacy Policy of each individual partner.

To ensure the provision of services to you, we provide your personal data to:

Clients. This is necessary to give you discounts and access to the company's products. Each company registered in our system to participate in the loyalty system has access to your data published in your profile.

Third-party supporting services and partners ensuring the proper functioning of our services:

Location data is transferred to Google services to ensure the operation of the service and to give directions to the selected company.

To analyze data and improve our services, we use services such as Google Analytics, crash services that gain access to your activities resulting in any given analyzed consequences. For example, in the case of an unexpected application error, we send a report on recent actions to prevent similar errors in the future.

Social networks receive information on your registration in our App when our services are logged into via these networks.

In order to send you push-notifications, we use supporting services that access your data and send you notifications in accordance with your consent.

To implement additional functions, such as uploading a profile picture, you should give an access to your image library to an image uploading service.

Clients have the opportunity to integrate non-cash payment to improve the efficiency of their services. These payments are carried out through third-party services that can access your payment information.

Personal data protection

In accordance with the industry standards “UDS” implements a number of measures focused on protecting your data.

One of the most important priorities of the company is to protect and keep User personal data safe and secure. In order to protect User personal information and to follow the requirements set by the European privacy law No. 2016/679 dated by 27.04.16 and taken effect on May 25, 2018, aiming at providing more effective and secure ways of control of the personal data to the interested parties,

“UDS” undertakes to respect Users’ rights in accordance with the Swiss, European and other fundamental laws protecting personal data based on which “UDS” is operated.

We work hard to protect you and “UDS” from unauthorized access, alteration, disclosure or destruction of information we hold, namely:

- we use encryption to keep your data being transferred private;
- we offer a range of security features, like safe browsing, security check-up and 2 step verification to help you protect your account;
- we review our information collection, storage, and processing practices to prevent unauthorized access to our systems;
- we restrict access to personal information to our employees who need that information in order to process it. Anyone with this access is subject to strict contractual confidentiality obligations and may be disciplined or terminated if they fail to meet these obligations.

“UDS” may periodically incorporate amendments into the present Privacy Policy and in case of making significant amendments “UDS” publishes a relevant notice on the website, applications and other services (hereinafter referred to as “UDS App” or Services) or notifies you by other means so that you can view the changes before continuing to work with “UDS”. If you disagree with any changes, you can delete your account. If you proceed using “UDS” after publication or distribution of the notice of changes to this Privacy Policy, it means that you agree with these changes.

We store and process your personal data on Servers located in different jurisdictions where our representative offices or service providers are located. By accepting the terms of this Policy, you agree that your data is transferred, processed and stored this way. We take all necessary steps to ensure reliable processing of your personal data in accordance with this Policy. Third parties to whom personal data may be transferred to ensure the operation of our Services may be located in other countries where laws on processing personal data may be less stringent than in your country. From time to time, personal data may also be stored in other places, and in such cases, we guarantee that personal data will be stored and processed with an adequate level of protection and security.

Support service

When you contact a support service, “UDS” collects data in order to answer your questions and improve the service quality.

When you contact the support service, “UDS” collects data that helps to categorize questions and answer them, and if necessary, to investigate violations of the Terms of the User Agreement or the present Privacy Policy. This information is also used to identify potential problems, monitor trends and improve the quality of the support responses.

Using “UDS” Services

“UDS” collects data when you visit the “UDS” website, use “UDS App” mobile applications and interact with advertisements in “UDS”.

“UDS” collects data when you use the “UDS” website and applications (for example, “UDS App” for iPhone, “UDS App” for Android, etc.). “UDS” collects data when you browse advertisements or click on them, join groups, participate in surveys, install the “UDS App” mobile application.

Using third-party services and visiting third-party websites

“UDS” collects data when you use the “UDS” account to log on other websites or services. “UDS” receives information when you use the “UDS” account to log on to other websites or a third-party application.

Cookie files

“UDS” uses cookie files to personalize its opportunities and to display relevant advertisement. “UDS” uses cookie files or similar technologies, including mobile devices identifiers

for identifying you, improving the usability of “UDS”, improving safety, analyzing the use of the Services and displaying advertising. By accessing the “UDS” website, you hereby consent to the placement of cookie files and web beacons in your browser in accordance with the present Privacy Policy.

Advertising

In the personal account, you have the opportunity to agree that your data may be used for more accurate content personalization, including improving the relevance of search results and recommendations displayed.

You can manage your preferences about the ads shown to you on the App. You can modify your interests, choose whether your personal information is used to make ads more relevant to you, and turn on or off certain advertising services.

Log files, IP addresses, and information concerning your computer or mobile device

“UDS” collects data from devices and networks through which you connect to “UDS”. This information helps to improve the quality and safety of Services and Products.

Other

“UDS” is constantly working on improving the quality of Services and Products, which means that in the course of time new ways of collecting data may be implemented. “UDS” reserves the right to implement new features, some of which are used for data collection. In this case, you will be additionally informed about the changes made.

Consent to personal data processing

By registration in “UDS”, you agree that the information specified by you in a profile will be accessible for other Participants and will be used in accordance with our Privacy Policy and User Agreement.

Providing personal data to “UDS” when creating or updating an account and profile, you voluntarily and explicitly accept the terms and conditions of the “UDS” User Agreement. Information provision to “UDS”, including any information considered confidential under the applicable law, is entirely voluntary. The person who registered the account is fully responsible for its credibility.

At the moment, when creating a personal account, the user has a limited list of features, namely: he can change data, delete the content and close the account.

However, closing the account does not mean removing it and deleting all personal data collected about this user. You need to exercise the right of the registered user to revoke this consent by deleting your account, the right of an unregistered user of the App or the Site to delete data by contacting our support service or otherwise.

When entering the app without registration, we suggest you accept the terms of this Policy. By accepting these terms and continuing to use the App, you give us your consent to the processing of personal data.

Data on an unregistered user can be deleted after his/her identification by a unique device (PC, phone, etc.).

Messages and notifications from “UDS”

“UDS” interacts with you by sending messages, e-mails and other means. “UDS” can send you messages related to the availability of Services and Products, security and other aspects of Services and Products provision.

Emails, notices on the “UDS” website, SMS-messages may be used to contact you.

Your responsibility for keeping “UDS” Identification Number and password

You undertake responsibility for the security of “UDS” ID Number and password that you use to get access to our services. You shall promptly inform us if there is any suspicion of illegal use

of your “UDS” ID or password by any other persons. As your “UDS” ID and password are unique, you undertake your sole responsibility for partial or full use of our services by using your “UDS” ID.

Minors

Any person under the age of 18 is considered minor and has no right to participate in the marketing plan of the “UDS” company and receive monetary compensation for the recommendation of company services. The user is personally responsible for the violation of this paragraph, as well as for misinforming the Company about his/her age by entering false information during registration.

Providing data to Affiliates

If it is necessary for the provision of Services, “UDS” may provide your personal data to Affiliates of “UDS”, who do not directly process your data. Accepting this Privacy Policy, you agree with this practice.

Content

You undertake responsibility for any information published by you on the “UDS” website and this information will be accessible for other Participants.

If you share content on the website or import blog or other data, you should take into consideration that the published data can be read, collected, or used by other Participants in the relevant forums, developers and third-party organizations.

“UDS” is not responsible for the information you post in these forums. Content in “UDS” groups may be publicly available for browsing and searching on the Internet. Other Participants may copy and use information that you publish.

Providing data in the judicial process and in other cases provided by law

“UDS” may provide your personal data in case of a subpoena, or in accordance with other legal process requirements, as well as in cases where it is required to enforce the Terms of User Agreement.

It is possible that “UDS” will be obliged to disclose personal data, the information specified in the profile, and/or information about the “UDS” Participant’s activity in case of a subpoena or in accordance with other legal process requirements, as well as in cases when “UDS” has grounds to believe that disclosure is necessary for:

1. investigation, prevention or taking actions against suspected or actual violations or helping government enforcement agencies;
2. enforcement of the terms of the User Agreement, investigation of any claims or accusations of third parties and defense from them or ensuring security and integrity of “UDS”;
3. maintenance or protection of the rights, property or security of “UDS”, Participants and “UDS” employees or others.

We will share personal information with natural and legal persons outside of “UDS” if we have a good-faith belief that access, use, preservation or disclosure of the information is reasonably necessary to:

- meet any applicable law, regulation, legal process or enforceable governmental request. We share information about the number and type of requests that we receive from governments in our transparency report.
- enforce applicable Terms of Service, including investigation of potential violations.
- detect, prevent or otherwise address fraud, security or technical issues.
- protect against harm to the rights, property or safety of “UDS”, our users or the public as required or permitted by law.

If “UDS” is involved in a merger, acquisition or sale of assets, we will continue to ensure the confidentiality of your personal information and give affected users notice before personal information is transferred or becomes subject to a different privacy policy.

Information disclosure to others due to amendments of control over the “UDS” website or its sale

In case of amendments of control or full or partial selling of “UDS”, “UDS” can provide your data to a third party, which will have the right to use this information in accordance with this Privacy Policy.

“UDS” may also provide your personal information to a third party when selling “UDS” assets, a sub-company or division, as well as when changing control over the company or one of its Affiliates, or during the preparation for these procedures. Any third party, to whom “UDS” transfers or sells its assets, will be entitled to continue to use the personal and other information provided by you in accordance with this Privacy Policy.

Participant’s Rights and Obligations

Rights to manage personal data and to close an account

1. You can change your data in “UDS” at any time by editing your account. You can also request more information about your account, which “UDS” may have.

You can delete the information from the account, export a copy of its content if you want to back it up or use it with another service.

To delete your information, you can:

- delete certain materials from the account;
- delete your account.

And finally, our App allows you to give someone else access to parts of your account in case you’re unexpectedly unable to use your account.

There are other ways to control the information that Google collects whether or not you’re signed in to a Google Account, including:

- Browser settings: For example, you can configure your browser to indicate when the app has set a cookie in your browser. You can also configure your browser to block all cookies. But remember that our App relies on cookies to function properly, for things such as remembering your language preferences and other parameters.
- Device-level settings: Your computer, smartphone or tablet may have controls that determine what information we collect. For example, you can modify location settings on your Android device.

Data storage

“UDS” saves your data as long as your account is active or while it is necessary. For example, “UDS” can store certain information even after deleting the account if it is necessary to fulfill the requirements of the legislation, to settle disputes, to prevent fraud or abuse, and to ensure the provisions of this Policy.

“UDS” retains personal information that you provide, as long as your account exists, or as is necessary to provide the Services to you. “UDS” can save your personal data even after closing the account if it is necessary for the execution of requirements of the legislation, settlement of disputes between the Participants, prevention of fraud or abuse, and to ensure provisions of this Policy. “UDS” can store personal data during a limited period of time in accordance with the requirements of the legislation. “UDS” Support Service can store information as long as it is necessary for reporting and this service work analysis. Personal data of users who have not logged in to the account is stored for 12 months for analysis of behavioural activities. In this case, identification of the data of such users is

tied with the device from which the user logs into the App. Storage of personal data of such users is terminated with the removal of the App.

Participant's Obligations

You are obliged to follow and execute the terms of the User Agreement.

As a Participant, you shall have certain responsibilities towards other Participants. Some of these responsibilities are determined by the relevant legislation and regulations.

You are obliged to execute all terms and conditions of this Privacy Policy and the User Agreement. It is also necessary to uphold all intellectual property rights (such as trademarks or photographs) that may belong to third parties.

You shall not download or otherwise distribute any information that may violate the rights of other Participants or can be regarded as dangerous, offensive, promoting violence, racism or xenophobia, as well as in any way contrary to the purpose and spirit of "UDS".

You shall keep confidential and not disclose your credentials (email address and password) used to log on.

In the case of non-compliance with the above-said obligations, the operation of your account may be unilaterally limited, suspended or terminated by "UDS".

Important notices

Introduction of amendments to the Privacy Policy

"UDS" will notify you if any amendments have been incorporated into this Privacy Policy.

"UDS" may periodically make changes in this Privacy Policy. If there are any substantive changes related to the processing of personal data or the Privacy Policy, you can find information about them on the official website. We advise you to study these changes carefully. If you agree with the changes, you can simply continue to use "UDS". If you disagree with any changes and do not want to use "UDS" any longer, you should close your account. Unless stated otherwise, this Privacy Policy shall be applied to all information about you and your account, which "UDS" has.

Responsibility

"UDS" has strong views on security and privacy issues, however, you should remember that the Internet is an unsafe environment; you shall be cautious and use strong passwords. There is no guarantee that the information will not be reviewed, disclosed, altered or destroyed by virtue of failure or overcoming any physical, technical and administrative security measures. You shall be responsible for the security of your credentials. E-mails, instant messaging and similar means of communication with other "UDS".

Participants are not encrypted, so transmitting confidential information by them is not recommended. Using a strong password is recommended to ensure account security. We take responsibility for the security of your personal data. If your personal data is leaked, we will immediately notify you and the regulatory authorities within 42 hours in virtue of current standards.