



LLC "Trading Systems Lab"

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APPROVED:

General Director

LLC "Trading Systems Lab"

Artyshko A.S.

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Privacy Policy of LLC "Trading Systems Lab"

This Privacy Policy (hereinafter referred to as the "Policy") applies to all information that LLC "Trading Systems Lab" (hereinafter referred to as TSLab) may obtain from the user while using the official TSLab website (<http://tsverse.ru/>, hereinafter referred to as the "Website"), using services, purchasing software, participating in campaigns, or other interactions (hereinafter referred to as the "Services", "TSLab Services").

TSLab does not control and is not responsible for third-party websites that the user may access via links available on the TSLab website. Third-party websites may have their own privacy policies, and other personal information may be collected or requested from the user.

This Policy explains how TSLab processes and protects users' personal information.

For specific TSLab Services, additional provisions may be published to supplement this Policy.

1. Personal Information of Users Collected and Processed by TSLab

1.1. Within the framework of this Policy, "personal information of the user" means:

1.1.1. Personal information that the user provides about themselves voluntarily during registration (creating an account) or while using the Services, including the user's personal data. Information required for the provision of Services is explicitly marked. Other information is provided by the user at their discretion.

- 1.1.2. Other information about the user, the collection and/or provision of which is determined for the provision of specific Services. The collection and processing of such information are carried out only with the user's prior consent, except in cases provided for by the legislation of the Russian Federation.
- 1.2. Personal information provided by the user to TSLab is considered inaccurate and may be blocked until the user or their legal representative provides consent for the processing of the user's personal data.

2. Purposes of Processing Users' Personal Information

- 2.1. TSLab processes only the personal data necessary to provide and improve the quality of the Services.
- 2.2. TSLab may use the user's personal information for the following purposes:
 - 2.2.1. Identifying the party within the framework of providing the Service.
 - 2.2.2. Providing the user with personalized Services.
 - 2.2.3. Improving the quality of Services and developing new ones.
 - 2.2.4. Sending information about various events and new Services. Such actions are carried out only with the user's separate consent.
 - 2.2.5. Notifying the user about necessary actions related to the provision of services.
 - 2.2.6. Conducting statistical and other research based on anonymized data. TSLab anonymizes personal data in accordance with the requirements of Article 11 of Federal Law No. 152-FZ "On Personal Data". Anonymization is carried out in such a way as to exclude the possibility of identifying the subject of personal data by third parties.

3. Transfer of Users' Personal Information to Third Parties

- 3.1. The confidentiality of the user's personal information is maintained, except in cases where the processing of personal data is provided to an unlimited number of persons by the user or at their request. Access is provided only in cases stipulated by law or with the user's consent.
- 3.2. TSLab has the right to transfer the user's personal information to third parties in the following cases:
 - 3.2.1. The user has given their consent to such actions.
 - 3.2.2. The transfer is necessary to achieve the goals, perform functions, powers, and obligations imposed on TSLab by the legislation of the Russian Federation. For example, transferring data to tax authorities, courts, etc.

4. Measures Taken to Protect Users' Personal Information

- 4.1. TSLab takes the necessary and sufficient organizational and technical measures to protect the user's personal information from unauthorized or accidental access, destruction, alteration, blocking, copying, distribution, as well as from other unlawful actions by third parties. To protect personal data, TSLab uses modern encryption technologies, antivirus software, access control systems, and limits employee access to personal data in accordance with their job responsibilities.

5. User Rights and Obligations

- 5.1. TSLab takes reasonable measures to maintain the accuracy and relevance of the personal data it holds, as well as to delete outdated, inaccurate, or excessive personal data. However, the user is responsible for providing accurate information and updating the provided data in case of any changes.
- 5.2. The user may at any time change (update, supplement, block, destroy) the personal information they have provided or its confidentiality settings by contacting TSLab. TSLab undertakes to review the user's request within 30 calendar days from the date of receipt. If additional information is required, the review period may be extended, and the user will be notified.
- 5.3. The user has the right to receive information regarding the processing of their personal data by TSLab. Such information is provided free of charge in accordance with the requirements of Article 14 of Federal Law No. 152-FZ "On Personal Data".
- 5.4. To fulfill the provisions of clauses 5.2 and 5.3 of this Policy, TSLab may require the user to confirm their identity by requesting such confirmation in accordance with the law "On Personal Data".
- 5.5. If the user wishes to opt out of receiving information specified in clause 2.2.4, they must send an email to unsubscribe@rt.tsverse.ru or notify TSLab Support. The user can also independently opt out of mailings by changing the corresponding setting in their profile. Opting out of informational mailings does not affect the ability to use other TSLab Services.

6. Feedback. Questions and Suggestions

- 6.1. All suggestions or questions regarding this Policy should be directed to TSLab through the Support Center at <http://support.tsverse.ru>.

Conclusion

This Policy has been developed in accordance with Federal Law No. 152-FZ “On Personal Data” and other regulatory acts of the Russian Federation.

General Director of “Trading Systems Lab” LLC

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