

PRIVACY POLICY

Last update date: 08.15.2022

This policy is effective as of: 08.15.2022

Avrora Group Limited (Hereinafter referred to as "**Provider**") understands and respects your privacy concerns. Our priority is to safeguard your privacy in all of your interactions with us, including your use of the Avrora Marketplace (the "**Marketplace**").

This Privacy Policy is intended to inform the users of the Marketplace about the Provider's policy regarding the collection, use and disclosure of users' personal data.

1. Terms

- 1.1. **Cookies** — small data files that are typically used as anonymous unique identifiers. They are sent to your browser from the websites that the User visits and are stored in the internal memory of your device.
- 1.2. **Personal data** — data that identifies, relates to the User, describes, can be used for communication or can be directly or indirectly related to the User.

2. General provisions

- 2.1. By using the Marketplace, the User agrees to the collection and use of information in accordance with this Privacy Policy.
- 2.2. The personal information that Provider collects is used to provide and improve the Marketplace and related services. The Marketplace stores your personal information so that you may continue to use the Marketplace for as long as it is required in order to fulfill the relevant purposes described in this Privacy Policy and as required by legislation for tax and accounting purposes and compliance with AML laws, for example
- 2.3. Terms used in this Privacy Policy have the same meaning as in the Marketplace Terms of Use, unless otherwise specified in this Privacy Policy.

3. Information collection and use

- 3.1. In order to implement the activities of the Marketplace in a better way, the Provider may require the User to provide certain personal information. The Marketplace uses third-party services that may collect information used to identify the User.
- 3.2. Link to the privacy policy of third-party service providers used by the App.
 - Google Play Services ¹
 - Google Analytics for Firebase ²

¹ <https://www.google.com/policies/privacy/>

² <https://firebase.google.com/policies/analytics>

- Firebase Crashlytics ³

4. Logbook data

- 4.1. Any time the User uses the Marketplace, and in case of an error occurring in the App, the Provider collects data and information (via third-party products) on the User's device, which is referred to as log data.
- 4.2. Log data may include such information as:
 - user's device IP address;
 - device name;
 - operating system version;
 - configuration of the App when using the Marketplace;
 - time and date of use of the Marketplace by the User;
 - other statistical data.

5. Cookies

- 5.1. This Service does not use "cookies" explicitly. However, the Marketplace may use third-party code and libraries that use cookies to collect information and improve its services.
- 5.2. User can accept or deny cookies and recognize when a cookie is sent to their device.
- 5.3. Notice: refusing to process cookies may result in the inability to use some parts of the Marketplace.

6. User Rights

- 6.1. *Right to receive information:*

The User has the right to receive information about the collection and use of their personal data. This information is set forth in the terms of this Privacy Policy.

- 6.2. *Right of access:*

The User may, at any time, request access to their personal data stored by the Provider by contacting by e-mail at support@avro-ra-token.com or mailing to the following address: Suite 3, First Floor, La Ciotat Buidling, Mont Fleuri, Mahe, Seychelles.

- 6.3. *Right of rectification:*

If the User's personal data stored by the Provider is inaccurate or incomplete, the User has the right to request the Provider to correct the information at any time.

- 6.4. *Right to deletion:*

³ <https://firebase.google.com/support/privacy/>

The User has the right to request the Provider to delete their personal data to the extent such personal data is no longer necessary for the purpose that it was collected for, or if the data is processed on the basis of the User's consent and they decide to withdraw their consent. In such cases, the Provider must stop processing the User's personal data and remove the data from IT systems and databases.

The user is deprived of the right to deletion of personal data if:

- The data cannot be deleted because of a statutory obligation or if it must be processed in accordance with a statutory obligation.
- Processing is necessary for establishing, executing or defending legal requirements.

6.5. *Right to limit data processing:*

The user has the right to request the Provider to limit the processing of their personal data.

6.6. *Right to object against the processing:*

If the User's data is processed by the Provider, the User may object to the processing of personal data at any time.

The User can defend any of the rights of the personal data subject described above against the Provider by sending their requests through the contact data.

6.7. *The right to file a complaint to the data protection supervisory authority:*

The user has the right to file a complaint with the data protection supervisory authority if they believe that the processing of personal data by the Provider violates data protection law.

Before filing a complaint with the supervisory authority, the User is obliged to take steps to settle disputes directly with the Provider.

7. Service providers

7.1. The Provider may employ third-party companies and individuals for the following reasons:

- To facilitate the operation of the Marketplace;
- To represent the Marketplace on behalf of the Provider;
- To provide services related to the Marketplace;
- To analyze statistical data about the use of the Marketplace by Users.

7.2. The third parties referred to in clause 7.1 of the Privacy Policy have access to the personal data of Users in order to perform the tasks assigned to them on behalf of the Provider.

7.3. The third parties specified in clause 7.1 of Privacy Policy are obliged not to disclose and not to use the information for any other purposes.

8. Safety

- 8.1. The Provider appreciates the trust of Users in providing the personal information, so the Provider strives to use commercially acceptable means of its protection.
- 8.2. Despite the measures of Users' personal data protection, you should understand that no method of information transfer via Internet or method of electronic storage is 100% safe and reliable and the Provider cannot guarantee its total security.

9. Links to Third Party Sites

- 9.1. The Marketplace may contain links to other sites. If the User clicks on a third-party link, they will be redirected to the third-party site.
- 9.2. The Provider does not operate, control or in any way responsible for the content, privacy policies or actions of any third party sites or services.
- 9.3. Users are strongly encouraged to review the privacy policies of third party websites.

10. Children's Privacy

- 10.1. The services provided by the Provider are not intended for persons who are under the age of majority according to the legislation applicable to them.
- 10.2. The Provider does not collect the personal data of the persons specified in clause 10.1. of the Privacy Policy.
- 10.3. In case the fact of processing of personal data of the person specified in paragraph 10.1 of the Policy is detected, the Provider immediately deletes such information from the servers and databases.
- 10.4. If the person reading this Privacy Policy is a parent or guardian and knows that their child has provided personal data to the Provider, please report this incident to the contact information specified in clause 12 of this Privacy Policy.

11. Changes to the Privacy Policy

- 11.1. The Provider has the right to update this Privacy Policy.
- 11.2. By continuing to use the Marketplace, the User agrees to all of the changes made.
- 11.3. Users are advised to review this page from time to time for changes.
- 11.4. If the User does not agree with the changes made, they are prohibited from using the Marketplace.

12. Contact information for feedback

- 12.1. If you have any questions or suggestions regarding this Privacy Policy, please send them to: support@avrorra-token.com.