

## **Iskra Privacy Policy**

Your privacy is very important to us.

### **Introduction**

Our privacy policy (the “Privacy Policy”) explains the information we collect, how we use and share it, how to manage your privacy controls and your rights in connection with our websites.

Iskra is headquartered in Russian Federation and our Services are provided to you by «ВендоСофт». «ВендоСофт» is the controller of your personal data for the purposes of Russian Federation data protection law.

Questions or comments about this Privacy Policy may be submitted by mail to the address below or via e-mail [mail@mail365.ru](mailto:mail@mail365.ru)

185035, Russia, Republic of Karelia, Petrozavodsk, Gercena street, 35

### **Information Iskra Collects**

Iskra collects information about you, including information that directly or indirectly identifies you, if you or your other members choose to share it with Iskra.

We receive information in a few different ways, including when you track, complete or upload activities using the Services. Iskra also collects information about how you use the Services. There are also several opportunities for you to share information about yourself, your friends, and your activities with Iskra.

### **Account, Profile, Activity, and Use Information**

We collect basic account information such as your name, email address, date of birth, gender, weight, username and password that helps secure and provide you with access to our Services.

Profile, activity and use information is collected about you when you choose to upload a picture, activity (including date, time and geo-location information as well as your speed and pace and perceived exertion) or post, join a challenge, add your equipment usage, view others’ activities, or otherwise use the Services.

We use your contact information so we can respond to your support requests and comments.

### **Location Information**

We collect and process location information when you sign up for and use the Services.

We do not track your device location while you are not using Iskra, but in order to provide Iskra’s core Services, it is necessary for us to track your device location while you use Iskra. If you would like to stop the device location tracking, you may do so at any time by adjusting your device settings.

### **Connected Devices and Apps**

Iskra collects information from devices and apps you connect to Iskra. For example, you may connect your Garmin watch or Flywheel account to Iskra and information from these devices and apps will be passed along to Iskra.

### **Health Information**

Iskra may collect or infer health information. Certain health information may be inferred from sources such as heart rate or other measurements, including power, cadence, and weight or other indicators. Before you can upload health information to Iskra, you must give your explicit consent to the processing of that health information

by Iskra. You can withdraw your consent to Iskra processing your health information at any time.

### **Third-Party Accounts**

Iskra allows you to sign up and log in to the Services using accounts you create with third-party products and services, such as Facebook, Google, or Apple (collectively, “Third-Party Accounts”). If you access the Services with Third-Party Accounts we will collect information that you have agreed to make available such as your name, email address, profile information and preferences. This information is collected by the Third- Party Account provider and is provided to Iskra under their privacy policies. You can generally control the information that we receive from these sources using the privacy controls in your Third-Party Account.

### **Technical Information and Log Files**

We collect information from your browser, computer, or mobile device, which provide us with technical information when you access or use the Services. This technical information includes device and network information, cookies, log files and analytics information.

The Services use log files. The information stored in those files includes IP addresses, browser type, internet service provider (ISP), referring/exit pages, platform type, date/time stamp, and number of clicks. This information is used to analyze trends, administer, protect and secure the Services, track member movement in the aggregate, and gather broad demographic information for aggregate use. IP addresses may be linked to session IDs, athlete IDs and device identifiers.

### **Other Information**

We may collect information from you through third parties, such as when we collect your feedback through surveys.

We may also collect information about you from other members such as when they give you kudos or comment on your activities.

### **How Iskra Uses Information**

We use the information we collect and receive to provide the Services, including providing you with the ability to:

- Record your activities and analyze your performance. For example, to compare your past efforts, analyze your training, and (with your consent) use your heart rate information to provide you with interesting and useful performance analysis.
- Interact with other athletes. For example, to compete on segments, participate in clubs, challenges, or events, follow other athletes, and use features that help athletes interact with one another, such as group activities or flyby.
- Manage your training. For example, to set goals and use your training dashboard. Explore new places to go. For example, to discover routes or segments where you can run or ride.
- To visualize your activities in new ways. For example, by creating personal heatmaps or using your training log.

Your information, including parts of your profile, username, photos, members you follow and who follow you, clubs you belong to, your activities, the devices you use, and kudos and comments you give and receive will be shared on Iskra

so that you may be able to participate in the Services, for example to show your place on a leaderboard.

### **To customize your experience**

We use the information we collect about you, your followers, and your activities to customize your experience. For example, we may suggest segments, routes, challenges, or clubs that may interest you, athletes that you may want to follow, or new features that you may want to try. If we know that you like to run, we may tell you about new running activities or show you sponsored content related to running. If we see that you run in a certain area, we may suggest a race in that area.

### **Aggregate Information**

We do not sell your personal information. Iskra may aggregate the information you and others make available in connection with the Services and post it publicly or share it with third parties. Examples of the type of information we may aggregate include information about equipment, usage, demographics, routes and

performance. Iskra may use, sell, license, and share this aggregated information with third parties for research, business or other purposes such as to improve walking, running or riding in cities or to help our partners understand more about athletes, including the people who use their products and services. Iskra also uses aggregated data to generate our Global Heatmap.

### **How We Protect Information**

We take several measures to safeguard the collection, transmission and storage of the data we collect. We employ reasonable protections for your information that are appropriate to its sensitivity. The Services use industry standard Secure Sockets Layer (SSL) technology to allow for the encryption of personal information and credit card numbers. Iskra engages providers that are industry leaders in online security, including Services verification, to strengthen the security of our Services. The Services are registered with site identification authorities so that your browser can confirm Iskra's identity before any personal information is sent. In addition, Iskra's secure servers protect this information using advanced firewall technology.

### **Deleting Information and Accounts and downloading Your Data**

You can delete your account or download your data using our self-service tools.

After you make a deletion request, we permanently and irreversibly delete your personal data from our systems, including backups. Once deleted, your data, including your account, activities and place on leaderboards cannot be reinstated. Following your deletion of your account, it may take up to 90 days to delete your personal information and system logs from our systems. Additionally, we may retain information where deletion requests are made to comply with the law and take other actions permitted by law.

Note that content you have shared with others, such as photos, or that others have copied may also remain visible after you have deleted your account or deleted specific information from your own profile. Your public profile may be displayed in search engine results until the search engine refreshes its cache.

Iskra also provides you the option to remove individual activities you have posted without deleting your account. Once removed, the activities may remain on Iskra's systems until you delete your account.

## **Our Legal Bases**

Iskra relies on a number of legal bases to collect, use, share, and otherwise process the information we have about you for the purposes described in this Privacy Policy, including:

- We cannot provide the Services unless we collect and use your location information;
- where you have consented to the processing;
- where necessary to comply with a legal obligation, a court order, or to exercise and defend legal claims;
- to protect your vital interests, or those of others, such as in the case of emergencies.

## **Transfers**

The Services are operated from the Russia. If you are located outside of the Russia and choose to use the Services or provide information to us, you acknowledge and understand that your information will be transferred, processed and stored in the Russia, as it is necessary to provide the Services. Russian privacy laws may not be as protective as those in your jurisdiction.

## **Retention of Information**

We retain information as long as it is necessary to provide the Services to you and others, subject to any legal obligations to further retain such information. Information associated with your account will generally be kept until it is no longer necessary to provide the Services or until your account is deleted. In addition, you can delete some items of information (e.g., profile information) and you can remove individual activities from view on the Services without deleting your account. For example, after you withdraw your consent to Iskra processing your health-related information, Iskra will delete all health-related information you upload. Following your deletion of your account, it may take up to 90 days to fully delete your personal information and system logs from our systems. Additionally, we may retain information to comply with the law, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with investigations and take other actions permitted by law. The information we retain will be handled in accordance with this Privacy Policy.

Information connected to you that is no longer necessary and relevant to provide our Services may be de-identified or aggregated with other non-personal data to provide insights which are commercially valuable to Iskra, such as statistics of the use of the Services.

## **Privacy Policy Information**

Iskra reserves the right to modify this Privacy Policy at any time. Please review it occasionally. If Iskra makes changes to this Privacy Policy, the updated Privacy Policy will be posted on the Services in a timely manner and, if we make material changes, we will provide a prominent notice. If you object to any of the changes to this Privacy Policy, you should stop using the Services and delete your account.