

Privacy Policy Introduction

INTELIT LTD is committed to protecting and respecting your privacy. We want to tell you how we use and protect your personal information. This document among others includes information regarding to your rights and personal data that we hold.

This Privacy Policy sets out how we may use, process and store your personal information. We may get that information from you or our partners, through contracts or other legal arrangements you have with us or our partners on behalf of us, in order to deliver contractual/legal obligations.

Company Intelit Ltd. owns the rights to the advertising space on the site fotostrana.ru and in the Fotostrana mobile application, and therefore has a number of partners of advertisers and advertising distributors who can collect your data for the purpose of improving advertising.

The Laws and Regulations We Are in Compliance With

REGULATION (EU) 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation) (“GDPR”).

INTELIT LTD, Ioanni Chakket, 44 MERIKA BUILDING 6045, Larnaca,Cyprus

info@intelit.org

(hereinafter "**Intelit Ltd**")

Changes to Our Privacy Policy

We may change this notice from time to time in the future. Any such changes will be posted here and, where appropriate, notified to you in writing. We advise you to check back frequently to see any updates or changes.

Intelit Ltd is Devoted to

1. Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless informed legal consent from you have received.
2. Personal data shall be obtained for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
5. Personal data shall be processed in accordance with the rights of data subjects under this Act. Appropriate technical and organizational measures shall be taken against unauthorized or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
6. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Privacy Policy

Last Updated March 10, 2020

Intelit Ltd is committed to compliance with data protection laws and this policy sets out our personal information gathering and sharing practices for services you provide to us (**the, “You”, “Your”, the Services**).

By submitting your information to us, you agree to the processing set out in this Privacy Policy. Further notices highlighting certain uses we wish to make of your personal information.

This policy covers the following matters (amongst others):

- the collection of personal information;
- the use of that personal information;
- the legal bases for the processing of that information;
- disclosures of that personal information to third parties;
- international transfers of personal information;
- and the use of cookies on the website.

I. Data Controller

Data Controller is a person which determines the purposes and means of the processing of personal data

- 1.1 This policy applies where we are acting as a data controller with respect to your personal data and therefore determine the purposes and means of the processing of that personal data.
- 1.2 We will ask you to consent to our use of cookies in accordance with the terms of this policy when you first visit our website.

II. Personal Data We Use, Purposes and Legal Grounds

Our Services are dynamic, and we often introduce new features, which may require the collection of new information. If we collect materially different personal data or materially change how we use your data, we will notify you and may also modify this charter of privacy policy use

Type of information	Purpose	Legal basis of processing
Information about the device, unique advertising device identifiers (for example, Google Advertiser ID and IDFA), cookies IP address, geographical coordinates, data about the Internet and cellular service provider, application usage data (including logs, statistics)	Statistical and marketing goals	Consent

III Legal Disclosures

We promise to take all reasonable measures to process your personal data safe however in some cases we have no way but to release it for the purposes of taking any legal action to protect your or our interests

<p>It is possible that we will need to disclose information about you when required by law, subpoena, or other legal process or if we have a good faith belief that disclosure is reasonably necessary to (1) investigate, prevent, or take action regarding suspected or actual illegal activities or to assist government enforcement agencies; (2) enforce our agreements with you.</p>	<p><i>We may need to share your data when we believe it's required by law or to help protect the rights and safety of you or others.</i></p> <p><i>We also need to share your data when we believe that integrity of our services are at risk or our services endures legal claims</i></p>
<p>We also would need to disclose information to investigate and defend ourselves 1) against any third-party claims or allegations, 2) protect the security or integrity of our Service (such as by sharing with companies facing similar threats); or exercise or protect the rights and safety of us, our members, personnel, or others.</p>	

IV. Information We May Provide to Third Parties

We involve third parties to help us provide our Services. They will have access to your information as reasonably necessary to perform these tasks on our behalf and are obligated not to disclose or use it for other purposes.

4.1 We may transfer your data specified in section II of this Policy to our advertising partners, including:

Yandex – [privacy policy](#);

Google - [privacy policy](#);

BetweenX - [privacy policy](#);

MyTarget - [privacy policy](#) и [privacy policy for users from EU](#);

Criteo - [privacy policy](#).

4.2 In addition to the specific disclosures of personal data set out in this Section, we may disclose your personal data where such disclosure is necessary for compliance with a legal obligation to which we are subject to, or in order to protect your vital interests or the vital interests of another natural person.

V. You Have the Following Rights

You can access or delete your personal data. You have many choices about how your data is collected, used and shared. For personal data that we have you have:

The right to be informed.	Intelit Ltd is publishing this Privacy Policy to keep you informed as to what we do with your personal information.
The right to access.	You have the right to access your information being processed under our control.
The right to rectification.	If the information Intelit Ltd holds about you is inaccurate or not complete, you have the right to request us to rectify it. If that data has been transferred to a third party with your consent or for legal reasons, then we must also request them to rectify the data.
The right to erasure (The right to be forgotten).	If you want Intelit Ltd to erase all your personal data and we are not obliged to continue to process and hold it.
The right to restrict processing.	You may request Intelit Ltd to restrict the way we process your data. This means we are permitted to store the data but not further process it.

The right to data portability.	Intelit Ltd provide you with a right to obtain and reuse your personal data for your own purposes across services in a safe and secure way without this effecting the usability of your data. It allows you to move, copy or transfer personal data easily from one company (IT environment) to another in a safe and secure way.
The right to object.	You have the right to object to Intelit Ltd to processing your data even if it is based on our legitimate interests, the exercise of official authority, direct marketing (including data aggregation), and processing for the purposeless of statistics.
The right to withdraw consent.	You have the right to withdraw your consent at any time, and Intelit Ltd must stop processing your data.
The right to complain to a Supervisory Authority.	You have the right to complain to the supervisory authority if you believe that Intelit Ltd has not responded to your requests or solved a problem.

VI. International Transfers of Your Personal Data

We store and use your data outside your country taking all reasonable and lawful measures to protect it

- 6.1. We process data both inside and outside of the European Union and rely on legally provided mechanisms to lawfully transfer data across borders. Countries where we process data may have laws which are different, and potentially not as protective, as the laws of your own country.

VII. Retaining and Deleting Personal Data

We will retain your personal information for as long as it is necessary for the processing purposes for which it was collected.

If it is not possible to specify in advance the periods for which your personal data will be retained we will determine the period of retention based on the need of such information for particular purpose.

- 7.1 Personal data that we process for purposes we have specified above will not be kept for longer than is necessary for that purpose or those purposes.
- 7.2. Certain transaction details and correspondence may be retained until the time limit for claims in respect of the transaction has expired or in order to comply with regulatory requirements regarding the retention of such data.
- 7.3. If information is used for two purposes we will retain it until the purpose with the latest period expires; but we will stop using it for the purpose with a shorter period one that period expires.
- 7.4. We restrict access to your personal information to those persons who need to use it for the relevant purpose(s). Our retention periods are based on business needs and your information that is no longer needed is either irreversibly anonymised (and the anonymised information may be retained) or securely destroyed.
- 7.5. If we retained the data, we will use reasonable endeavours to ensure that your personal information is accurate. In order to assist us with this, you should notify us of any changes to the personal information that you have provided to us by updating your details on this site or by contacting us.
- 7.6. We retain your personal data even after you have closed your account if reasonably necessary to comply with our legal obligations (including law enforcement requests), meet regulatory requirements, resolve disputes, maintain security, prevent fraud and abuse.

VIII. Cookies

<p>We use cookies and similar technologies (e.g., pixels, ad tags and device identifiers) to recognize you. We also allow some others to use cookies as described in our Cookie Policy.</p>	<p><i>We collect data through cookies to define you properly.</i></p>
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<p>You can control cookies through your browser settings and other tools. You can also <u>opt-out</u> from our use of cookies and similar technologies that track your behavior on the sites of others for third party advertising.</p>	<p><i>You may opt out from tracking your activity.</i></p>
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IX. Security and Security Over the Internet

We regularly monitor our systems for possible vulnerabilities and attacks. However, we cannot warrant the security of any information that you send us. There is no guarantee that data may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards.

- 9.1. No data transmission over the Internet or website can be guaranteed to be secure from intrusion; any transmission is at your own risk. However, we maintain commercially reasonable physical, electronic and procedural safeguards to protect your personal information in accordance with data protection legislative requirements.

- 9.2. All information you provide to us is stored on our or our subcontractors' secure servers and accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Website, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

X. Amendments

<p>We can modify this Privacy Policy, and if we make changes to it, we will provide you notice to review the changes before they become effective. If you object to any changes, you may <u>close your account</u>.</p>	<p><i>Changes to the Privacy Policy apply to your use of our Services after the "effective date".</i></p>
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Your continued use of our Services after we publish or send a notice about our changes to this Privacy Policy means that the collection, use and sharing of your personal data is subject to the updated Privacy Policy.

If you continue to use our Service, we deem you do not mind against Changes after we kindly notified you.