

Welcome to DataSouls (Sorevnovaniya Analiza Dannikh LLC (PSRN 1187746174758, TIN 7707408527) hereinafter - “DataSouls,” “we” and “us”). Thank you for your interest in our website(s), products, services and applications (the “Services”). This Privacy Policy is meant to help you understand what information we collect, why we collect it, and how you can update, manage, export, and delete your information. If you have any questions about this Privacy Policy, you can contact us by email: gdpr@datasouls.com.

Privacy Policy

Effective Date: January 21, 2020

When you clicked “accept” or “agree” in connection with registering your account, we made available to you this Privacy Policy and the information handling practices described in here. This Privacy Policy only covers DataSouls’ practices regarding personal information, and not information more generally. We may use aggregated, anonymized data that we derived from your personal information before you deleted it, but not in a manner that incorporates any of your personal information or would identify you personally.

We’ll ask for your consent before using your information for a purpose that isn’t covered in this Privacy Policy. You may, of course, decline to share certain personal information with DataSouls, in which case DataSouls may not be able to provide to you some of the features and functionality found on the Services.

1. We collect information to provide better Services to all our users. When you’re not signed into a DataSouls account, we store the information we collect with unique identifiers tied to the browser, application, or device you’re using. When you’re signed in, we collect information that we store with your DataSouls account.
2. When you create a DataSouls account, submit competition entries or otherwise use the Services, you provide us with personal information that includes your name and a password. You may also provide your mailing address and mobile phone number, or other personal information.

Your provision of this personal data is required for you to enter into the Terms of Use, a contract with us, as well as for you to enter competitions hosted on the Services. These entries are also a contract between you and the competition host, and we need your personal information to host the Services offered under that contract (see the Terms of Use for additional information). If you do not provide the minimum amount of personal data required to register an account, including your name and email address, you cannot use the Services, as this information is necessary for contractual reasons. Please see “European Requirements” below for further information on the bases for our processing your personal information.

We also collect the content you create, upload, or receive from others when using our Services. This includes things like messages you write and receive, forum posts, kernels, datasets, and competition submissions.

3. We collect information about the apps, browsers, and devices you use to access our Services or open one of our HTML emails by using different types of technology, including “clear gifs” or “web beacons.” This “automatically collected” information may include Internet Protocol address (also known as “IP address”) or other device address or ID, web browser or device type, the web pages or sites that you visit just before or just after the Services, the pages you view on the Services, and the dates and times that you visit the Services.

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.

4. We collect information about your activity in our Services, which may include:
 - i. Views and interactions with content and ads.
 - ii. People with whom you communicate or share content.
 - iii. Which datasets you view or download.
5. When you use the Services, we send one or more cookies – small text files containing a string of alphanumeric characters – to your computer. For example, we use cookies to ensure proper navigation between pages on the Services. DataSouls may use both session cookies and persistent cookies. A session cookie disappears after you close your browser. A persistent cookie remains after you close your browser and may be used by your browser on subsequent visits to the Services.

Persistent cookies can be removed. Please review your web browser’s “Help” file to learn the proper way to modify your cookie settings. If you delete, or choose not to accept, cookies from the Services, you may not be able to utilize the features of the Services to their fullest potential.

We may also implement on the Services third party content, such as advertising or analytic services, that uses “clear gifs,” “web beacons,” or other similar techniques, which allow the third party content provider to read and write cookies to your browser or implement similar tracking mechanisms. This information is collected directly by the third party, and DataSouls does not participate in that data transmission. Information collected by third parties in this manner is subject to that third party’s own data collection, use, and disclosure policies. We currently implement services provided by Google Analytics, Yandex Metrika.

6. When you link an account you may have on a third party service (such as a third party social networking site or email provider) to your DataSouls account, DataSouls collects certain information stored in connection with that account that you have configured that service to make available, including your email address, provider ID, first and last name, and profile picture. By linking your accounts in this manner, you authorize DataSouls to access and use your account on the third party service in connection with your use of the Services.
7. DataSouls uses the information we collect for the following purposes:
 - i. to deliver our Services, like administering competitions you enter or hosting datasets you upload or access. For example, we use the IP address assigned to your device to send you the data you requested, such as loading a dataset. Another example is that we use unique identifiers stored in cookies on your device to help us authenticate you as the person who should have access to your DataSouls account.
 - ii. to ensure our Services are working as intended, such as tracking outages or troubleshooting issues that you report to us. For example, we continuously monitor our systems to look for problems. And if we find something wrong with a specific feature, reviewing activity information collected before the problem started allows us to fix things more quickly.
 - iii. to make improvements to our Services – for example, to understand and analyze the usage trends and preferences of our DataSouls account members and to improve the way the Services work and look.

For example, we use cookies to analyze how people interact with our Services, which can help us build better products. It may help us discover that it’s taking people too long to complete a certain

task or that they have trouble finishing steps at all. We can then redesign that feature and improve the product for everyone.

- iv. to help us create new features and functionality.
- v. to customize our Services for you, including remembering your information so that you will not have to log-in again the next time you visit the Services if you haven't signed out. We also use data to provide customized third party content and information and to track your status in any Competitions or other activities. In addition, we may use the information we collect to provide personalized and relevant advertising.
- vi. We use data for analytics and measurement to understand how our Services are used. For example, we analyze data about your visits to our sites to do things like optimize product design, monitor and analyze the operation and effectiveness of the Services and related activities, and monitor aggregate site usage metrics such as total number of visitors and pages viewed. We use a variety of tools to do this, including Google Analytics, Yandex Metrika.
- vii. We use information we collect, like your email address, to interact with you directly. For example, we may send you a notification if we detect suspicious activity on your account, or we may let you know about upcoming changes or improvements to our Services. We will also use your email address to contact you with respect to competition entries, prize awards and otherwise in connection with competitions; for administrative and customer service purposes; to address intellectual property infringement, rights of privacy, or defamation issues; or regarding things you post on the Services. And if you contact DataSouls, we'll keep a record of your request to help solve any issues you might be facing.

DataSouls also uses your email address or other personal information to send you messages about the Services and communications from other Members. We may also send you messages related to the Services and the activities of third parties we work with. These messages may be targeted at you based on your activities on our Services, for example your interaction with a particular dataset or your entry into a specific competition. You will have the ability to opt-out of receiving any such communications, either through links provided in the messages, or by updating your Member Account settings through the Services.

- viii. to help improve the safety and reliability of our Services. This includes detecting, preventing, and responding to fraud, abuse, security risks, and technical issues that could harm DataSouls, our users, or the public. For example, we collect and analyze IP addresses and cookie data to protect against automated abuse. This abuse can take many forms, such as sending spam to DataSouls users or launching a Distributed Denial of Service (DDoS) attack.

When we detect spam, malware, illegal content, and other forms of abuse on our systems in violation of our policies, we may disable your account or take other appropriate action. In certain circumstances, we may also report the violation to appropriate authorities.

- 8. When you're signed into your DataSouls account, you can always review and update information by visiting your account profile.
- 9. You can export a copy of content in your DataSouls account if you want to back it up or use it with a service outside of DataSouls by contacting us by email gdpr@datasouls.com. You may update, correct, or delete your profile information and preferences at any time by accessing your account settings page or editing your DataSouls account profile through the Services.

10. You can also delete your discussion posts, uploaded datasets, and kernels by using the available tools in our Services. If desired, you can delete your entire DataSouls account by choosing that option in your account settings page.

Please note that while your deletions are reflected promptly in active member databases, in some cases, we retain data for limited periods when it needs to be kept for legitimate business or legal purposes.

11. There are other ways to control the information DataSouls collects whether or not you're signed in to a DataSouls account, including configuring your browser to indicate when DataSouls has set a cookie in your browser. You can also configure your browser to block all cookies from a specific domain or all domains. But remember that our Services rely on cookies to function properly.
12. As we describe above (Section 10), you can delete your entire DataSouls account or selectively delete your discussion posts, uploaded datasets, and kernels by using the available tools in our Services. In some cases, rather than provide a way to delete data, we store it for a predetermined period of time. For each type of data, we set retention timeframes based on the reason for its collection.

Sometimes business and legal requirements require us to retain certain information for specific purposes for an extended period of time. For example, when you submit an entry in a competition, we may retain this information for a longer period of time to guard against cheating, for example, or for legal purposes. Reasons we might retain some data for longer periods of time include:

- i. Security, fraud & abuse prevention
 - ii. Complying with legal or regulatory requirements
 - iii. Ensuring the continuity of our services
13. When you delete data in your DataSouls account, we immediately start the process of removing it from the product and our systems. First, we aim to immediately remove it from view. For example, if you delete a post you made, we will immediately remove that from the public-facing DataSouls website.

We then begin a process designed to safely and completely delete the data from our storage systems. Safe deletion is important to protect our users and customers from accidental data loss. Complete deletion of data from our servers is equally important for users' peace of mind. This process generally takes around 2 months from the time of deletion. This often includes up to a month-long recovery period in case the data was removed unintentionally.

Each of our storage systems from which data gets deleted has its own detailed process for safe and complete deletion. This might involve repeated passes through the system to confirm all data has been deleted, or brief delays to allow for recovery from mistakes. As a result, deletion could sometimes take longer when extra time is needed to safely and completely delete the data.

Our services also use encrypted backup storage as another layer of protection to help recover from potential disasters. Data can remain on these systems for up to 6 months.

As with any deletion process, things like routine maintenance, unexpected outages, bugs, or failures in our protocols may cause delays in the processes and timeframes defined in this article. We maintain systems designed to detect and remediate such issues.

14. Many of our Services let you share information with other people, and you have control over how you share. Any information that you voluntarily choose to include in an area of the Services accessible to other DataSouls members or the public, such as a public profile page or in a forum posting, will be

available to other DataSouls members who access that content or the public (as applicable). This also applies to information you choose to make available through features that connect to third party services, if applicable.

Also, if you communicate directly with another DataSouls member, any information that you voluntarily choose to include in such a communication with other DataSouls members will be available to such other members. Once you make your information available in any of these ways, it could be collected and used by the recipients without restriction. We urge DataSouls members to exercise common sense, prudence and good judgment about what information to make available to others through the Services.

15. We do not sell your information. We do, however, disclose your personal information in connection with developing and maintaining the Services and operating Competitions. We share your personal information in the following cases:
 - i. We'll share personal information outside of DataSouls when we have your consent. For example, if you give us permission to share your information with a third party who may be a prospective employer.
 - ii. DataSouls may disclose your personal information to the hosts of competitions to enable your participation in the competitions and our operation of the competitions. The terms of that disclosure are covered in the competition rules, which is a contract between you and the competition sponsor.
 - iii. We provide personal information to our affiliates and other trusted businesses or persons to process it for us, based on our instructions and in compliance with our Privacy Policy and any other appropriate confidentiality and security measures. For example, we use service providers to help us with customer support. These third parties may have access to or process your personal information as a result of performing the services they were engaged to perform.
 - iv. We will share personal information outside of DataSouls if we have a good-faith belief that access, use, preservation, or disclosure of the information is reasonably necessary to:
 - a. Meet any applicable law, regulation, legal process, or enforceable governmental request.
 - b. Enforce our Terms of Use, including investigation of potential violations, and take precautions against liability.
 - c. Detect, prevent, or otherwise address fraud, abuse, security, or technical issues.
 - d. Protect against harm to the rights, property or safety of DataSouls or our affiliates, our users, or the public as required or permitted by law.
 - e. Protect the security or integrity of the Services and to protect or enforce third party rights.
 - v. We may share non-personally identifiable information publicly and with our partners — like publishers, advertisers, developers, or rights holders. For example, we share information publicly to show trends about the general use of our Services.
 - vi. If DataSouls is involved in a merger, acquisition, or sale of assets, we'll 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.
16. DataSouls uses a variety of physical, managerial, and technical safeguards designed to improve the security of our systems and your personal information. We cannot, however, ensure or warrant the

security of any information you transmit to DataSouls, nor can we guarantee that such information may not be accessed, disclosed, altered, or destroyed by breach of any of our physical, technical, or managerial safeguards. You transfer your information to DataSouls at your own risk.

If DataSouls learns of a security breach, we will notify you in accordance with applicable law.

17. The Services contain links to websites and services provided by third parties. Any personal information you provide on third party sites or services is provided directly to that third party and is subject to that third party's policies governing privacy and security. We are not responsible for the content or privacy and security practices and policies of third party sites or services to which links are displayed on the Services. We encourage you to learn about third parties' privacy and security policies before providing them with personal information.
18. Protecting the privacy of children is especially important. For that reason, DataSouls does not knowingly collect or maintain personal information from persons under 14 years old, and no part of the Services is directed to persons under 14. *If you are under 14 years of age, please do not use or access the Services at any time or in any manner.*

If DataSouls learns that personal information of children under 14 years old has been collected on the Services without verifiable parental consent, then DataSouls will take the appropriate steps to delete this information. If you are a parent or guardian and discover that your child under the age of 14 has obtained a user account on the Services, then you may alert DataSouls at gdpr@datasouls.com and request that DataSouls delete that child's personal information from its systems.

If you are between the ages of 14 and 16 years old, you may not use the Services until DataSouls has received verifiable parental consent for your use of the Services. If you are between the ages of 14 and 18 years old or under the age of contractual majority in your country, you also may not enter any competitions until DataSouls has received verifiable parental consent for your entry into a specific competition. Please check the eligibility rules for each competition to verify that minors are allowed to participate and ensure that the parental consent form is on file for each competition.

19. We regularly review this Privacy Policy and make sure that we process your information in ways that comply with it.
20. Your information may be processed on servers located outside of the country where you live. Data protection laws vary among countries, with some providing more protection than others. Regardless of where your information is processed, we apply the same protections described in this policy.

When we receive formal written complaints, we respond by contacting the person who made the complaint. We work with the appropriate regulatory authorities, including local data protection authorities, to resolve any complaints regarding the transfer of your data that we cannot resolve with you directly.

21. If European Union (EU) data protection law applies to the processing of your information, you can exercise your right to request access to, update, remove, and restrict the processing of your information. You also have the right to object to the processing of your information or export your information to another service.

If you have any questions, you may contact our data protection office at gdpr@datasouls.com. If you have concerns regarding your rights under local law, you can contact your local data protection authority.

22. We process your information for the purposes described in this policy, based on the following legal grounds:

- i. We ask for your agreement to process your information for specific purposes and you have the right to withdraw your consent at any time. You can manage these settings in your DataSouls account.
- ii. We process your information for our legitimate interests while applying appropriate safeguards that protect your privacy. This means that we process your information for things like:
 - a. Providing, maintaining, and improving our Services to meet the needs of our users;
 - b. Developing new products and features that are useful for our users;
 - c. Understanding how people use our Services to ensure and improve the performance of our Services;
 - d. Customizing our Services to provide you with a better user experience;
 - e. Marketing to inform users about our Services;
 - f. Providing advertising to make many of our Services freely available for users;
 - g. Detecting, preventing, or otherwise addressing fraud, abuse, security, or technical issues with our Services;
 - h. Protecting against harm to the rights, property or safety of DataSouls, our users, or the public as required or permitted by law;
 - i. Performing research that improves our Services for our users and benefits the public;
 - j. Fulfilling obligations to our partners like developers and rights holders;
 - k. Enforcing legal claims, including investigation of potential violations of our Terms of Use.
- iii. We process your data to provide a service you've asked for under a contract. For example, we process your information in connection with competitions you enter.
- iv. We'll process your data when we have a legal obligation to do so, for example, if we're responding to legal process or an enforceable governmental request.

23. We change this Privacy Policy from time to time. We will not reduce your rights under this Privacy Policy without your explicit consent. We always indicate the date the last changes were published and if changes are significant, we'll provide a more prominent notice (including, for certain services, email notification of Privacy Policy changes).

Our amended Privacy Policy will become effective on a going-forward basis as stated in the Terms, except that (i) unless you agree otherwise, we will use your personal information in the manner described in the Privacy Policy in effect when we received that information and (ii) if you do not agree with any changes to the Privacy Policy, you must terminate your DataSouls membership and cease use of the Services. Your continued use of the Services after a revised Privacy Policy has become effective indicates that you have read, understood and agreed to the current version of the Privacy Policy.

Please contact DataSouls with any questions or comments about this Privacy Policy, your personal information, our use and disclosure practices, or your consent choices through gdpr@datasouls.com.