

Privacy Policy

Dear user,

Thank you for choosing *yoUr app*. We want you to have clear understanding of how we collect and use information and protect your privacy. So before using *yoUr app*, please carefully read our Privacy Policy below. Please note that using *yoUr app* shall be deemed as your acceptance of this Privacy Policy and your commitment to comply with all applicable laws and regulations. If you do not accept and/or agree to any provisions below, please immediately stop using *yoUr app*.

Who are we

We are limited liability company “**Rolodex**”, incorporated in Georgia with its registered address at: Tbilisi, Betlemi street #13, telephone number:+995599207940, web-site:urapp.io, e-mail: support@urapp.io .

We provide software application “*yoUr app*” and services in connection with using *yoUr app* (below jointly referred to as “*yoUr app*” or “the application”).

Data we collect about you

The information that we collect from you is either provided directly by you or is collected automatically by our software.

The information provided by you normally includes your e-mail address, your cellphone number and information in your mobile phonebook: your contacts, their phone numbers, e-mail addresses, job titles etc. Provision of such information is entirely up to you, you may chose not to enable access of our application to your phonebook, but in such case, you will not enjoy all the benefits that *yoUr app* can provide.

Automatically collected information may include hardware model and identification information, operating system version, system activities and other device information, Internet Protocol address, account sign-in or sign-out, browser version, mobile network, mobile operator and location information if you use our location features.

You may grant or withdraw permissions through security software and we will try our best to seek reasonable balance between your permissions and your experience, for instance, we may request your authorization when you use certain functions for the first time, but we will not seek authorizations for the subsequent uses not to affect your experience.

Purpose and legal basis for using your information

We use your information in order to:

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- a) Operate, customize and improve our application;
 - b) Ensure safety and security of our application;
 - c) Communicate with you and other users;
 - d) Allow contact and interaction between you and other users.
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We process the information we have as described, under the following legal basis:

- to fulfill our Terms;
- on the basis of your consent, which you can revoke at any time;
- to comply with our legal obligations;
- to protect your vital interests, or those of others;
- as necessary in the public interest; and
- as necessary for our (or others') legitimate interests, unless those interests are overridden by your interests or fundamental rights and freedoms that require protection of personal data.

Sharing personal information with third parties

We will not share, transfer and/or disclose your information to any third party other than our affiliates and partners who are directly involved in providing you with our application, in particular, we will not sell, lease or otherwise distribute your information for any purpose.

We will disclose your personal information only when:

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- a) Disclosure is required by law and/or by relevant governmental or judicial authority;
 - b) in case of emergency and where necessary, the information is required to be disclosed in order to protect the lawful rights and interests of *Rolodex* or other users or the public security and public interest.

In the above situations, we will do our best to notify you on the disclosure, however you understand and agree that we cannot assume any liability if we are precluded from making a timely notification because of the reasons that are beyond our control.

We will not allow third party advertisements through *yoUr app* and will not disclose your information for advertisement and/or marketing purposes.

In case you find out that your or somebody else's information was stolen, leaked or disclosed without authorization, please notify us immediately and provide as much information as possible so that we can investigate and handle the matter efficiently.

Your legal rights

You have the right to:

- a) **Request access** to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it;
- b) **Request correction** of the personal data that we hold about you;
- c) **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it, where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons, which will be notified to you, if applicable, at the time of your request;
- d) **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation, which makes you think that it affects

your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information, which override your rights and freedoms

- e) **Request restriction of processing** of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data, but we need to verify whether we have overriding legitimate grounds to use it;
- f) **Withdraw consent at any time** where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out below, please Contact us at support@urapp.io.

In the circumstance where the EU General Data Protection Regulation (“GDPR”) applies to the services provided by us, we commit that you will have all relevant rights and interests under the Regulation.

Information security

We take various security measures to protect the information and data stored in our systems against unauthorized access, use or disclosure of the same. Information you store is safeguarded in the server AWS server. Specific technical measures will be adjusted from time to time with the technical and business development. We will use our best efforts to protect the security of your information. However, please understand that there is no such security measure, which will work against all risks due to the complexity of security environment on the Internet.

Please understand that there are many factors affecting cybersecurity and if some information is lost and/or accessed and/or used without authorization, we should timely follow up with relevant technical remedy or precautionary measure as well, but we will not assume any liability for third party actions.

In particular, if your personal information or privacy is compromised due to any of the following causes, we will use our best efforts to remedy or assist you, provided, however, that you shall agree that we are not liable for:

1. Loss, disclosure and/or destruction of the information due to computer virus, Trojan and hacker attack;
2. Loss, disclosure and/or destruction of the information because you disclosed your password to others, third parties obtained your password, or you shared a registered account with others; or
3. Any other disclosure of personal information not attributable to us.

If your personal information has been or may be leaked, destroyed or lost, we will take remedies at once and notify you as soon as possible (via alert/announcement when accessing the application, telephone, e-mail etc.) and report to the relevant authority. In any event of disclosure, loss or destruction of the information where the threat level is high, our remedies may include discontinuation of service for the account involved (to be resumed as soon as practicable). You will be asked to assist in the process if necessary and please cooperate to ensure swift and efficient handling of the matter.

Retention/storage of personal information

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements under law. Generally this period constitutes 6 (six) years.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve these purposes through other means and the applicable legal requirements.

In some circumstances we may anonymize your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

Assignment, transfer, change of control

We are free to assign all of our rights and obligations under this Privacy Policy to any of our affiliates, in connection with a merger, acquisition, restructuring, or sale of assets, or by operation of law or otherwise, and we may transfer your information to any of our affiliates, successor entities, or new owner.

Any new entity that receives your data because of sale, merger, assignment, transfer or for any other reason will continue to use the information according to the law and this Privacy Policy.

Privacy terms applicable to minors

We pay great attention to the security and protection of data privacy of minors. We will be unable to identify whether the user is a minor unless we are expressly notified of the same. We will not use or immediately stop using the personal information of the minor if we are informed that the user is a minor, unless for the purpose of

providing necessary and emergency help or as stipulated herein. If any guardian or interested party of the minor finds that the minor's information is involved in using *yoUr app*, please contact us via our customer service support at support@urapp.io Upon verification and confirmation of the issue, we will immediately delete information, cancel account or respond otherwise as required.

Law and Jurisdiction

This Privacy Policy and our actions and obligations regarding protection of your personal information are subject to the laws of Georgia. When using *yoUr app*, you agree that the laws of Georgia will regulate your actions and you consent to the jurisdiction of the courts of Georgia. You agree that any dispute arising out of or in connection with this Privacy Policy should be first resolved through negotiations, failing which it is to be submitted to the Tbilisi City Court or to the arbitration tribunal mutually agreed by you and us.

Severability

If there is anything in this Policy contradicting the legal provisions applicable to it, the legal provisions prevail over the contradicting part. If there is anything not covered by this Privacy Policy, the applicable legal provisions will fill in and govern.

If any clause or part of the Privacy Policy is found to be unlawful, invalid or unenforceable, the other clauses or other parts of the Privacy Policy shall not be affected.

Updates and amendments to the Privacy Policy

We may update or amend this Privacy Policy from time to time. Please review this Policy regularly to be aware of any updates. If any update results in essential restriction of your rights under the Privacy Policy, we will notify you by posting the reminder or announcement where it is notable at the interface of *yoUr app*, or by e-mailing you, before the date when the revised version becomes effective. **Your continued use of *yoUr app* will be deemed as your full acceptance of the updated Privacy Policy.**

If you have any questions, suggestions or complaints or about our Privacy Policy, please Contact us at support@urapp.io.