

**Company Limited  
responsibility  
SIC Scanner**

**Policy  
protection of personal data  
in the program of visual display of  
the camera of the SOVA mobile  
phone  
(Special On View Application)**

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## INTRODUCTION

1. This Policy of personal data processing and protection (hereinafter - the Policy) defines the procedure for processing and protection of personal data in the Limited Liability Company "SIC" Scanner ", a legal entity that is properly established and operates in accordance with the laws of Ukraine, USREOU code -; address: 18019 Ukraine, Cherkasy, 122/1 Smilyanska Street, telephone number: +38 (0472) 55-27-35, website: scanner.ua (hereinafter - the Company or the Controller), and establishes the procedure for to prevent and detect any violations of applicable personal data laws.
2. This Policy has been developed in accordance with the legislation of Ukraine and the European Union, namely in accordance with the following documents:
  - General Data Protection Regulation (GDPR), adopted by the European Parliament and the Council of the European Union on 27 April 2016;
  - Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (Council of Europe, Strasbourg, 28 January 1981), ratified by Ukraine on 6 July 2010;
  - Law of Ukraine "On Personal Data Protection" №2297-17 of June 1, 2010;
  - any other local laws on personal data protection apply on the territory of Ukraine.
3. The main objectives of this Policy are:
  - determination of the procedure and conditions of personal data processing, in particular procedures aimed at preventing violations of laws and procedures of internal control in accordance with the applicable legislation on personal data;
  - acquaintance of the Company's employees responsible for personal data processing with the Policy of applicable legislation on personal data and the Company's requirements for personal data processing;
  - establishing responsibility for employees who process personal data for non-compliance with the requirements of applicable law on personal data;
  - observance of the right of personal data subjects to inform about the methods of processing their personal data by the Company.
4. The policy is mandatory for all employees of the Company.
5. The protection of personal data is terminated if the Company ceases its activities, or in the case of depersonalization of relevant data, unless otherwise provided by applicable law.

## BASIC DEFINITIONS

For the purposes of this Policy, the following definitions apply:

**Data Protection Officer** is the person responsible for monitoring the application of the General Data Protection Regulation (GDPR) and other applicable data protection laws in relation to the processing of personal data, and who performs the functions entrusted to him / her in accordance with this Policy and other applicable laws, and provides advice to the Company's management and communicates between SCANNER Group companies regarding the protection of personal data.

**Personal data** this is any information relating to an identified or identifiable individual (data subject); an identifiable natural person is a person who can be identified, in particular by identification information, namely by name, identification number, location data, online identifier or by one or more factors unique to the physical, physiological, the genetic, mental, economic, cultural or social identity of that individual, as well as audiovisual information read from a photo and video camera of a mobile phone or other reader.

**Processing** it is any operation or set of operations carried out on personal data or groups of personal data, whether or not it is carried out automatically, in particular the collection, registration, organization, structuring, storage, adaptation or modification, extraction, discussion, use, disclosure by transmission, distribution or other means, arrangement or aggregation, restriction on processing, erasure or destruction.

**Violation of the law on personal data protection** it is a breach of protection that results in the accidental or unlawful destruction, loss, alteration, unauthorized disclosure or access to personal data transmitted, stored or otherwise processed.

## **PERSONAL DATA COMPOSITION**

1. To personal data processed in the “SOVA” program (Special On View Application):

- audiovisual information read from a video camera of a mobile phone or a video camera of another device where this program is installed;

2. Special categories of personal data:

- The company does not process any information regarding the device installer, the owner of the device, any of his personal data, including phone numbers or other identifiers.

## **PROTECTION OF PERSONAL DATA**

**1. Personal data processing:**

- Personal data obtained through the SOVA program is in no way received, processed or stored by the Company.

**2. Control mechanism:**

- The Company provides verification of compliance with the requirements of this Policy by controlling the source code of the program and protecting Google Play from its modification.

## **RESPONSIBILITY**

1. Persons guilty of violating this Policy shall be prosecuted and punished as provided by the current legislation of Ukraine and other applicable laws.
2. The Company shall be liable for any violations of this Policy in accordance with applicable law.

## **TEAM RESPONSIBLE FOR PERSONAL DATA**

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