

# START PRIVACY POLICY

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Welcome to START video streaming service!

DIGITAL PLATFORMS TECHNOLOGY LLC (hereinafter referred to as **START** or "**we**") is your personal data processing operator. We appreciate and respect your interest in how we use your data.

The Privacy Policy (hereinafter referred to as the "**Policy**") explains who we are, how we collect, process, use and protect your data, and how you can enjoy your rights in relation to them.

The Policy is an integral part of the [Terms of Use](#) (hereinafter referred to as the "**User Agreement**" or the "**Agreement**"). All terms shall have the meanings that are given for them in the Agreement.

*Some clauses of the Policy apply depending on the available functionality of the START Service. The available functionality of the START Service may differ depending on the method of purchasing a subscription, the device used, and the territory.*

## 1. PURPOSES, LEGAL GROUNDS AND STORAGE PERIOD OF PERSONAL DATA

By visiting START video streaming service (hereinafter - START), you provide us with some data. The data that we can process do not allow us to identify you as a specific individual. But this data allow us to communicate with you (for example, notify you about updates), and you to use the video streaming service effectively (for example, save the same settings every time you log in). All purposes of using the data obtained from you are specified in the Privacy Policy. The scopes, period of use and legal grounds are listed below.

### 1.1. Provision of services:

If you visit the START and view Content, we can collect information on your name and surname, your mobile phone number, email address used, sex and date of birth, as well as IP address or other device identifier, browser type and version, time zone settings, type and version of the browser plug-in, operating system and platform, as well as other information on your devices and actions on selection of the content of the Service. In addition, we can obtain data on the time you have spent on our website and on each page in general.

Such data allow us to provide you with a personalized Service based, among other things, on your preferences. Not all of the listed data are necessary for us for the minimum functionality of the Service. If you do not want to provide certain data to us, you can change your choice through your browser settings.

We store the data obtained in the course of provision of services during the entire period of use of the Service and for six (6) months after the end of such period.

We stop using such data after the Service user account is deleted and store them until planned destruction. The data are stored in encrypted form.

After expiration of the storage period, the data will be destroyed in accordance with the procedure determined by our internal regulatory acts.

In case of processing the personal data by which we can identify you (for example, you filed a complaint and we requested additional data from you), we will store such data for thirty-six (36) months after processing is completed.

### 1.2. Marketing and public relations:

We can collect information specified in clause 1.1 of the Policy and use it to improve the efficiency and attractiveness of using the Service. It works like this:

- we offer profile settings based on your previous preferences;

- we create special improved Service usage opportunities for you and provide content that, in the opinion of our team of analysts, will increase the attractiveness of content selection;
- we analyze your stay on the Service in order to eliminate problems and control our own effectiveness;
- we can use the data that contain cookies to assess trends in using the Service and improve the quality of services.

Like any service, we strive to promote our services and improve their quality, but we do this carefully and assess the potential risks that may arise in the course of user data processing.

However, if it seems to you that such actions may violate your rights, please clear a checkbox in your personal account in START app in "Notifications" section.

We do not use your data to display ads on our Service and do not transfer the data to third parties for commercial purposes.

We store data for marketing communications during the entire period of use of the Service and for six (6) months after the end of such period.

We stop using these data after the Service user account is deleted and store them until planned destruction. The data are stored in encrypted form.

After expiration of the storage period, the data will be destroyed in accordance with the procedure determined by our internal regulatory acts.

### **1.3. Analytics:**

The service performs profiling of user data and this allows us to make it so attractive. We process and analyze the following data in automated mode: your name, user ID, login, avatar, information on your sex and date of birth, contact data, subscription payment data, technical data, information on your device, information on your visits, preferences, behavior, localization of content, registration date, subscription status and the channel through which you came to our site, as well as your account data in order to improve the Service operation and the servicing quality.

The Service does not use such processing to take decisions that may have significant consequences for users.

We store the data obtained in the course of such processing during the entire period of use of the Service and for six (6) months after its end.

We stop using such data after the Service user account is deleted and store them until planned destruction. The data are stored in encrypted form.

After expiration of the storage period, the data will be destroyed in accordance with the procedure determined by our internal regulatory acts.

## **2. DATA FROM OTHER SOURCES**

We can receive and process personal data from external sources, which, among other things, include:

- (a) service providers that help us identify your country by IP address to configure the Service;
- (b) authorization service providers that enable users to register or get access to the Service using their own tools or widgets. If you want to use their services for registration, we recommend you to read their privacy policy and other documents carefully;
- (c) selected partners that provide access to the Service on their websites, platforms and devices, or with which we provide services and conduct marketing activities jointly. They may transmit the following personal data to us: hashes of user ids, types and makes of devices, names of viewed content, types and names of subscriptions, mobile phone numbers, sex, age, as well as data on your activity, likes and preferences;

- (d) payment service providers that transfer information on the payment method you use to us (we do not collect or store the full details of your card, only information on the card type, its expiration date, payment date and time, as well as the last 4 digits of the card number);
- (e) data providers (for example, Google Analytics) from which we receive demographic data, information on your interests and advertising information.

### 3. SPECIAL CATEGORIES OF PERSONAL DATA

We do not request and do not intend to process any special categories of personal data, including information on your health status, race, religious beliefs, political views, philosophical views, sexual preferences and orientation.

### 4. DISCLOSURE OF DATA

We can disclose your personal data to the following persons and for the following purposes:

- (a) **To START:** We can exchange your personal data within START companies and affiliates for the purposes specified in section 2 of the Privacy Policy.
- (b) **To Service Providers:** We can engage other companies, agents or contractors (hereinafter - the "service providers") to assist us or provide services on our behalf. For example, suppliers provide us with marketing, advertising, infrastructure and information services, help us to personalize and optimize the Service, process credit card transactions and other types of payments, support us, collect debts, analyze and optimize data (including information on user interaction with the Service), conduct consumer surveys and process the results. In the process of provision of services, suppliers can have access to your personal data and other information. We do not allow them to use or disclose your data except in connection with the services they provide.
- (c) **To our partners:** for management or administration of certain Service systems, as well as for the purposes of analysis and further improvement of the Service and Content, including, but not limited to, when granting access to us to the mailing equipment (for example, mobile operators and other persons authorized by them). Providing these services, our partners can have access to your personal data, for example, email addresses, mobile phone numbers and other information within execution of the agreement concluded with us. We do not allow them to use or disclose your data except in connection with implementation of rights and obligations under the respective agreement.
- (d) **Within promotional campaigns:** sometimes we arrange promotions and marketing campaigns together with other services. If you participate in them, we can transfer information about you to third parties. If you comply with the terms and conditions of the promotion, we can disclose your name and other information about you for you to receive a reward.
- (e) **For protection of interests of START and third parties:** START and service providers can disclose or otherwise use your personal data if they reasonably deem it necessary to (a) comply with any applicable law, regulation, decision of the authorized body, judicial claim or official request from the authorized state bodies, (b) comply with the terms of use of the service and investigation of possible violations, (c) reveal and prevent illegal actions (including payment fraud), security problems and technical problems, (d) protect the rights, property and safety of the company, users or the society in general — to the extent, to which it is required and permitted by the law.
- (f) **In case of change of the owner:** in case of change of the owner or transfer of control over our company, brand or assets to other persons (including in case of transactions of mergers or acquisitions involving our company), we also transfer your personal data to them, provided that they agree to keep their confidentiality in accordance with this Policy.

### 5. CROSS-BORDER DATA TRANSFER

When we face the need to transfer your personal data to foreign service providers and affiliated companies that do not provide an appropriate level of protection, we conclude a standard personal data protection

agreement with them and ensure that the companies take all necessary and sufficient measures to comply therewith. In any case, we comply with all the requirements of the applicable legislation.

## 6. YOUR RIGHTS AND YOUR CHOICE REGARDING DATA

We tell you about the basic rights related to your personal data. If you want to implement them or learn more about them, please contact us. Contact information can be found at the end of this Policy. Please, note that some of the rights may not be applicable to your situation.

**(a) Right to access.** You have the right to know what personal data we process and why we do this. Therefore, we inform you in advance that we do not process data that may allow us to identify you directly or indirectly. If you have any questions or would like to learn more about what data we process about you, you can contact us at any time and we will provide you with additional information.

**(b) Right to rectification.** If you think that we store incorrect data about you, for example, an incorrect phone number or email address, you can ask us to make amendments to them.

**(c) Right to erasure / right to be forgotten.** You have the right to request secure erasure of personal data from our databases. You can send such a request if, for example, you think that we no longer need to store them. Please, note that in this case you will not be able to use the Service.

**(d) Right to restriction of processing.** You have the right to restrict processing of your data in certain situations. This means that we will continue to store your data, but we will temporarily stop any processing thereof. For example, if you asked us to rectify incorrect data, you can request to stop data processing until they are corrected.

**(e) Right to data portability.** In certain situations, you have the right to ask us to send you your personal identifiers in a digital form so that you can forward them to someone else or ask us to do so.

**(f) Right to object.** You have the right to object to processing of your data, even if we have legitimate grounds for it. This right can be exercised, for example, if we process your data based on our legitimate interests, and you believe that your personal interests prevail over ours. We use your data for direct marketing purposes, including creating a user profile, but at the same time we do not identify you, and if you still object to such use, please, let us know.

**(g) Right to withdraw consent.** If we process your personal data based on your consent, you have the right to withdraw your consent at any time.

**(h) Objection to automated data processing.** We process data in an automated mode, but we do not take decisions based on such processing. The mechanisms of processing your data rule out legal and other significant consequences for your data. If we change the data processing logic and such a change entails possible consequences, we will definitely inform you.

**(i) Right to file a complaint to the supervisory authority.** Right to file a complaint to the supervisory authority. If you are not satisfied with the method by which we process your personal data, you have the right to file a complaint against us to the competent supervisory authority at your place of registration or permanent residence.

## 7. PERSONAL DATA PROTECTION

We take reasonable technical, administrative, physical and organizational measures to protect your personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other unlawful actions with them by the third parties. These measures allow us to ensure a level of data security commensurate with the degree of risk related to their processing. Technical measures include compliance with the data storage policy and data encryption. We provide access to your personal data only to the employees that need them for work and that underwent appropriate training. We check the reasonableness and sufficiency of the measures taken by the data compliance and security audits.

## **8. COOKIES AND SIMILAR TECHNOLOGIES**

### **8.1. General information**

Cookies are small fragments of data that are stored on your device when you browse websites and use online services. For more information on how we use cookies, advertising identifiers and web beacons, please read our [Cookies Policy](#). You can refuse from processing of cookies, having indicated this when choosing to use cookies on the main page of our website.

### **8.2. "Do not track"**

"Do Not Track" is a privacy setting in a browser that notifies sites and services that the user does not want them to collect information on the pages he viewed. You can enable the tracking ban by default in the browser settings. You can read more about this function at: <http://www.allaboutdnt.com>.

## **9. CHANGES AND UPDATES**

We will update the Privacy Policy from time to time at our own discretion or in accordance with changes in legal, regulatory and operational requirements. We will notify you about such updates. If you continue to use the Service after receipt of the notification, we understand this as acceptance of the changes.

We recommend you to check the current version of the Privacy Policy at least once a month.

## **10. CONTACT US**

If you have any questions, doubts or comments regarding the security of your data or the provisions of the Policy, you can write to us to [privacy@start.film](mailto:privacy@start.film). We will reply within 10 days. Detailed information on our location and contacts can be found at <https://start.film/contacts> .

Thank you for reading our Privacy Policy.