

01/01/2021

This Data Processing and Protection Policy (hereinafter referred to as the Policy) has been accepted and considered effective for Bora Systems LLC, Estonia, Tartu, Soola 8. (hereinafter the Company).

We collect, use, and store Personal Data, which you provide while using our site and mobile application (hereinafter the site) or communicate to us in any format, in accordance with this Policy.

By using our sites and providing your Personal Data, you consent to having your Personal Data processed in accordance with this Policy.

Key Concepts

Personal Data is any information pertaining directly or indirectly to any identified or identifiable individual.

Personal Data processing is any action or combination of actions pertaining to your Personal Data, including collecting, recording, systematizing, storing, updating and modifying, extracting, using, transferring (distributing, providing, accessing), anonymizing, blocking, and deleting and destroying, performed both with and without an automated data processing system.

Data we gather

We gather:

- Personal Data that you provide by filling in information fields on our site, including contact forms, signing up for news and updates, registering for events, and registering to conclude a contract as well as accepting offers;
- Personal Data and other information contained in messages addressed to us;
- Personal Data which you provide by responding to our vacancies;
- technical data which is automatically transferred by the device you use to access our site, including the technical specifications of your device, IP address, information sent to your device and stored in cookies, browser information, the date and time our site was accessed, the addresses of requested pages, and any other similar information;

- other personal information which you willingly submit on our site.

Purpose of Processing Data

We process your Personal Data exclusively to achieve the purposes they were provided for, including:

- registering you on our website and granting you access to its individual sections, including creating an account and rendering services within the framework of the contract;
- providing information about the Company, our services, and events;
- communicating with you and when you contact us;
- making arrangements for your participation in our events and surveys;
- sending Company news and updates;
- exercising authority and performing all obligations imposed upon the company by Russian law; and
- all other purposes you consent to.

We process technical data:

- to ensure the functionality and security of our sites;
- to improve the quality of our site.

We do not host your Personal Data on any public data sources. We do not make any decisions which would carry legal consequences or in any way affect your rights and legal interests based on exclusively automated data processing.

Your Rights

The protection of your rights and freedoms in the field of Personal Data is of the utmost importance to the Company.

To protect your rights and freedoms, we will at your request:

- confirm that we process your Personal Data and provide you the opportunity to review it within 30 days of receiving your request;

- inform you of the source and contents of your Personal Data which we process;
- inform you of the legal grounds, purposes, terms, and methods in which your Personal Data is processed;
- make all necessary changes to your Personal Data provided you verify that such data is incomplete, inaccurate, or irrelevant within 7 days of receiving your verification and notify you of the changes made;
- inform you of any intended or completed cross-border transfers of your Personal Data;
- provide you the name and address of any organization that has access to your Personal Data and that may disclose your Personal Data with your consent;
- notify you of the full name and address of any entity which may be entrusted to process your Personal Data with your consent;
- inform you of how to exercise your rights when we process your Personal Data;
- exclude you from our newsletter and other news and update mailing lists;
- cease processing your Personal Data within 30 days of receiving a withdrawal of consent unless there exist any legal grounds provided under Russian law for processing your Personal Data;
- cease processing your Personal Data, provided it is verified that it is processed illegally and notify you of the measures taken;
- destroy your Personal Data, provided it is verified that it was unlawfully obtained or does not correspond to the declared purpose for processing, within 7 business days of receiving relevant verification and notify you of the measures taken; and
- answer questions related to your Personal Data that we process.

Contacting Us

Please send all of your enquiries pertaining to the processing of your Personal Data in a letter with the subject line “Personal Data Enquiry” (or “Withdrawal of Consent to Data Processing”) via e-mail to max@bora.systems or by post to 51004, Estonia, Tartu, Soola 8.

Personal Data Protection

To protect your Personal Data during processing, we take all appropriate, legal, organizational, and technical measures necessary to protect Personal Data from unlawful and incidental access, destruction, modification, blocking, copying, provision, distribution, as well as from other unlawful actions pertaining to Personal Data.

With the goal of adequately safeguarding your Personal Data, we evaluate all damage which could be caused by a violation of the security of your Personal Data, as well as determine current threats to the security of your Personal Data while being processed in Personal Data information systems.

Local acts have been accepted by the Company regarding questions of Personal Data protection. Company employees with access to Personal Data have been familiarized with this Policy and local acts pertaining to Personal Data protection.

Cross-Border Data Transfers

We transfer your Personal Data to foreign countries. Ensuring your Personal Data is secure during transfers is of the utmost importance to us. We take all necessary measures to ensure the confidentiality and security of your Personal Data.

Cross-border transfers of Personal Data to foreign countries that do not adequately protect Personal Data shall only be made with your written consent, to fulfill a contract to which you are party, or in other situations provided for under Estonian legislation pertaining to Personal Data.

Suspending Data Processing

We will cease to process your Personal Data:

- if conditions dictate data processing be suspended or the established timeframe expires;
- if the purpose for which data is processed is achieved or in the event of frustration of purpose to achieve these purposes;
- upon your request, provided the Personal Data to be processed has been unlawfully obtained or is deemed unnecessary for achieving the declared purpose for processing;

- in the event it is made known that your Personal Data is unlawfully processed and data processing cannot be legally justified;
- upon the expiration of the effective term of your consent to the processing of Personal Data or upon receipt of your withdrawal of consent, unless there exist any legal grounds provided under Russian law for processing your Personal Data; or
- if the Company is liquidated.

Cookies

We use cookies. Cookies are small text files that are stored on your device's hard disk while visiting various websites. The purpose of these files is to facilitate the configuration of the user interface to your preferences.

Most browsers allow you to disable cookies and clear them from your device's hard disk.

Links to Third-Party Sites

Our sites contain links to external sites and services, which are beyond our control. We are not liable for the security or confidentiality of any information collected by external sites or services.

Policy Changes

We may update this Policy to whatever extent necessary. We recommend you periodically check the relevance of this Policy. By continuing to use our site after any changes are made to the Policy, you agree to all changes made.

If you have any questions regarding this Policy, you may contact the Company point of contact for all data processing by sending a letter with the subject "Personal Data Enquiry" by e-mail to max@bora.systems or by post to 51004, Estonia, Tartu, Soola 8.