

## Luna Browser Privacy Policy

*This Privacy Policy (hereinafter referred to as the "Policy") is an integral part of the User Agreement of the Luna Browser, available at <https://legal.loonabrowser.ru/browser-agreement.pdf>, and governs the relationship between Innovative Development LLC ( hereinafter - "Company, We"), which is the copyright holder of the Luna Browser, and you (an individual on the Internet) (hereinafter - "User, You"), regarding the processing of User data, including personal data, in the process of using the Browser by such person "Luna".*

*This Policy is available at - <https://legal.loonabrowser.ru/privacy-policy.pdf>. Relations related to data processing are governed by this Policy, other rules posted within the Luna Browser, as well as applicable law. Before using the Luna Browser, the User must read this Policy, as well as all applicable rules and documents of the Luna Browser.*

*Upon registration, each access and/or actual use of the Luna Browser, the User agrees to the terms of this Policy, as well as the terms of agreements and rules of the Luna Browser, which are posted on the pages (in sections) of the Luna Browser, in the editions which were in effect at the time of actual use of the Luna Browser.*

### 1. Purposes of this Privacy Policy

The protection of User Data and ensuring its confidentiality are priorities for the Company, therefore, when using the Luna Browser, the Company protects and processes User Data in strict compliance with applicable laws.

We protect the interests of Users:

- explicitly explaining why and how We use User data (including personal data);
- by training and instructing our employees and regulating and restricting their access to User Data;
- deleting or reducing User Data as it is no longer needed for the purposes stated in the Policy;
- responding to observations and incidents to prevent them from recurring.

### 2. General Provisions

2.1. The following is a list of "terms" and "definitions" that are used in this Policy.

- 2.1.1. **Browser** is a software "Browser "Luna", which is a browser, i.e. application software for viewing pages, the content of web documents, computer files and their catalogues, managing web applications, as well as for other tasks;
- 2.1.2. **Company (Operator)** - limited liability company "Innovative Development" (OGRN / TIN 1227700160104 / 9703079836; legal address - Moscow, vn.ter.g. municipal district Aeroport, 23 Krasnoarmeyskaya St., sq. 61), possessing all necessary rights to granting the User the rights to use the Browser under the terms of the User Agreement. The Company processes User Data under the conditions stipulated by the Policy;
- 2.1.3. **User** - a legally capable natural person who has reached the required age to use the Browser in accordance with the applicable laws of the country of citizenship or residence of the User and who uses the Browser;

2.1.4. **User Data** - any information about the User (including personal data) that allows to identify the User and distinguish him/her from other natural persons.

2.2. Before using the Browser, the User confirms that he/she has read the terms and conditions of this Policy and expresses his/her consent to the Company's processing of User Data and its transfer to third parties providing web analytics services on the terms and conditions of this Policy.

2.3. The Browser, with the User's prior consent, can access information about phone numbers contained in the contact lists on the User's device, which allows the User to open the website of a financial organisation using the Browser and, when transferring funds, select the phone number of the recipient of funds from the list of phone numbers contained in the contacts on the User's device. At the same time, the Browser does not transfer or provide access to the financial organisations to the phone numbers from the list of contacts on the User's device - the User independently enters the phone number from the list of contacts from the User's device on the website of financial organisations and transfers it to the financial organisation when transferring funds by phone number.

### **3. What User Data, for what purposes and on what basis is processed by the Company**

3.1. Users have the right to use the Browser without registration and without the need to provide personal information about themselves.

Nevertheless, the Company, before using the Browser by the User, considers it necessary to provide Users with detailed information on the procedure of collection, further processing, including storage of User Data (see Table below). This processing is carried out in order to fulfil the User Agreement, namely:

№	Purposes of processing Browser User Data	List of processed User's data	Basis of data processing User	Note
1.	Ensuring basic functioning of the Browser	<ol style="list-style-type: none"> <li>1. Technical characteristics of the User's device (device model, operating system information, screen size, IP address, type and version the of the operating system used by the User);</li> <li>2. Statistical data related to the Browser installation (installation fact, startup fact, uninstallation fact, Browser update fact, information about enabling/disabling features, error information, information about diagnostic messages, address and part of "url" of the site added to the Browser start page, time of use of the Browser application launch speed, history of file downloads through the Browser; history of Internet browsing, files saved in the cache);</li> <li>3. Information about the fact, date, time of visiting network addresses, information about the fact, date, time of visiting sites and(or) pages of sites in the Internet, information entered in the;</li> <li>4. Information about the volume of consumed network traffic, cookie ID issued to the user;</li> <li>5. The geographical address of the user's connection point to the Internet, the unique identifier and alias of the user;</li> <li>6. Information about third-party applicationsthat the User uses when interacting with this Service;</li> <li>7. Information entered on websites (including those requiring authorisation);</li> </ol>	User Agreement	<p>The Browser saves for the User the addressesof the Internet pages that the User has visited using the Browser. Information about their IP addresses may also be added to this information.</p> <p>The Browser stores the cache (i.e. page elements and copies thereof) that the User opens through the Browser. This allows load pages faster.</p> <p>The place of storage is the User's device, as well as the Company's servers located in the Russian Federation.</p> <p>The period of processing of User Data is during the period of use of the Browser.</p>

№	Purposes of processing Browser User Data	List of processed User's data	Basis of data processing User	Note
		<ul style="list-style-type: none"> <li>8. Saved passwords and form autofill data;</li> <li>9. Information about phone numbers from the contact list on the User's device.</li> </ul>		
2.	Improving Browser performance and building analytics of Browser usage	<ul style="list-style-type: none"> <li>1. Technical specifications of the device (device model, information about operating system, screen size, IP address; network information when using the Browser, identifier numbers in the web analytics system);</li> <li>2. Information about third-party applications that the User uses when interacting with the Browser;</li> <li>3. Information about UTM-tags (means of analysing the ways of going to the Browser and loading the Browser);</li> <li>4. Search queries and information about links opened when using the Browser (applications, websites that Users view and search when using the Browser, including adverts and cookies), url (domain) of visited pages;</li> </ul>	User Agreement	<p>Web analytics systems will function when using the Browser in order to improve the operation of the Browser, it is an integral part of the operation of the Browser and is necessary for the use of the Browser by the User.</p> <p>The place of storage of such data is the User's device and web analytics systems.</p> <p>The period of processing of User Data is during the period of use of the Browser.</p>

№	Purposes of processing Browser User Data	List of processed User's data	Basis of data processing User	Note
		<ol style="list-style-type: none"> <li>5. Information entered by the User in wish-lists (wish-list);</li> <li>6. Information about the User ID assigned by the web analytics system;</li> <li>7. Number of visits and time using the Browser.</li> </ol>		
3.	Anti-advertising functionality (blocking adverts in the Browser)	<ol style="list-style-type: none"> <li>1. The address and/or the "url" portion of the site;</li> <li>2. Site Element;</li> <li>3. Malicious cookies that contain adverts and whose display of advertising content is restricted once enabled by the user;</li> <li>4. "Block Ads" functionality.</li> </ol>	User Agreement	<p>It is up to the user to decide whether to enable or disable the "Block Ads" functionality.</p> <p>When enabled "Anti-advertising" the Browser will block the ability to display advertising content on those sites that the Browser has entered into lists of sites with advertising content. The Browser independently enters and updates such lists on the basis of public information on the Internet.</p> <p>The place of storage of such data is the User's device.</p> <p>The period of processing of User Data is during the period of use of the Browser.</p>
4.	Functionality of using the User's contacts on websites opened through the Browser	<ol style="list-style-type: none"> <li>1. Information about phone numbers from the User's contacts contained on the User's device.</li> </ol>	User Consent; User Agreement	<p>When using the Browser, the User can select phone numbers from the contact list on the User's device to make a transfer on the financial institution's website.</p>

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				<p>of funds on such a phone number.</p> <p>Before using this functionality, the Browser requests a separate consent from the User. If the User provides it, the Browser will have access to phone numbers from the User's contact list, and the User will be able to open the financial organisation's website through the Browser and specify a phone number from their contact list from the User's device when transferring funds by phone number.</p> <p>In this case, the Browser does not transfer or provide access to the financial organisation to phone numbers from the contact list on the User's device.</p> <p>The user can revoke their consent by logging into Phone Settings in the section "Privacy and Security" further "Contacts" and switch the toggler off/on.</p> <p>The place of storage of the User's contact data is the User's device.</p> <p>Period of processing User Data - during the period of use of the Browser/until the toggler is switched off.</p>

№	Purposes of processing Browser User Data	List of processed User's data	Basis of data processing User	Note
5.	Functionality "Receiving PUSH notifications". (for IOS devices)	<ol style="list-style-type: none"> <li>1. Unique Browser User ID(s/n);</li> <li>2. User's full name;</li> <li>3. Identifiers of the User in the online service of third-party companies (applicable if the User has activated receipt of notifications / PUSH notifications from such service when using the Browser);</li> <li>4. Date/time of sending the PUSH notification;</li> <li>5. PUSH notification text<sup>1</sup>.</li> </ol>	User Consent	<p>This functionality is enabled only with the User's consent.</p> <p>To activate this functionality, you must separately consent in the Browser, and separately consent in the third party service whose notifications you wish to receive via the Browser.</p> <p>We notify you that once this functionality is enabled, the Browser will receive specified information about you from a third-party service in the format of PUSH notifications, which is necessary to send you a PUSH notification through the Browser.</p> <p>To disable this functionality, go to the "notifications" section and disable PUSH notifications from the service whose notifications you no longer want to receive. After that, the Browser will stop receiving the specified information about you from the third-party service, which was necessary for PUSH notifications.</p> <p>Examples of information that may be contained in PUSH notifications of retailers: User's full name, unique identifier of the User in information on discounts and product offers, information from the loyalty programme, etc.</p>

<sup>1</sup> The User is solely responsible and liable for actions related to receiving PUSH notifications via the Browser from third-party services.

The browser does not participate in forming the text of such notifications. All texts of PUSH notifications are formed by a third-party company, whose notifications the User has connected. In this case, the Browser does not purposefully process the text of PUSH notifications and does not analyse their content.

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				<p>For more details on what is contained in PUSH notifications, see the terms of service of the third-party companies whose PUSH notifications you connect.</p> <p>Data storage location - User's device / Company's server, located on the territory of the Russian Federation.</p> <p>Period of processing of User Data - during the period of use of the Browser/until the Functionality is deactivated "Receiving PUSH Notifications."</p>
6.	Technical support for the User when using the Browser	<ol style="list-style-type: none"> <li>1. Unique identifier of the User;</li> <li>2. Email address;</li> <li>3. Information contained in the User's application.</li> </ol>	User Agreement	<p>The period of processing of User Data is 3 years from the date of the User's request.</p> <p>The place of storage of User Data is the Company's servers located in the territory of the Russian Federation.</p>
7.	Registration and use of the Luna ID profile (for IOS devices)	<ol style="list-style-type: none"> <li>1. Surname, first name, patronymic (if available);</li> <li>2. Phone Number;</li> <li>3. Email address;</li> <li>4. Address (country / index / region / settlement / neighbourhood / district / street / house / flat (office));</li> <li>5. Avatar;</li> <li>6. System Status of the User;</li> <li>7. Favourite sites / services;</li> <li>8. Visit History;</li> <li>9. Settings (content filtering, blocking dangerous sites; blocking cookies);</li> <li>10. Profile ID;</li> </ol>	User Agreement	<p>The browser provides users with the option to register or access services using Luna ID. To create a Luna ID profile, the User registers in the Browser or is authorised via VK ID or Yandex ID.</p> <p>The place of storage of User Data is the Company's servers located in the Russian Federation.</p> <p>The term of processing of User Data during the period of use of the Luna ID profile.</p> <p>The user can delete his/her Luna ID profile by himself/herself by using the corresponding functionality of the Browser.</p>



		11. Device ID; 12. User ID; 13. Role of the User; 14. Photograph (photo image); 15. Type of operating system.		
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#### **4. Features of cookies processing**

- 4.1. A cookie is a small text file sent by a web server and stored on a computer, mobile phone or any other device with Internet access when you visit a website or mobile application (Service).
- 4.2. The browser uses the following types of cookies:
  - strictly necessary cookies / technical cookies: these cookies are necessary for the operation of the website and to provide the User with the functionality of the Browser; among other things, they allow the Company to identify the User's hardware and software, including the type of browser;
  - statistical / analytical cookies: these cookies allow us to recognise Users, count their number and collect information such as the operations performed in the Browser, including information about the web pages visited and the content the User receives;
  - technical cookies: these cookies collect information about how Users interact with the Browser, which allows us to identify errors and test new features to improve the performance of the Service;
  - functional cookies: these cookies allow you to provide certain functions to make it easier to use websites, for example by storing preferences (such as language and location);
  - (Third-party) tracking cookies: these cookies collect information about traffic sources, pages visited and adverts displayed to the User. They allow the display of advertisements that may be of interest to the User, based on an analysis of the information collected about the User. They are also used for statistical and research purposes.
- 4.3. Cookies shall be processed by the Company solely for the purposes set out in Table 3.1 of this Policy, on the terms and in the manner set out in this Policy.

#### **5. Features of the "Advanced User Data Protection" functionality**

- 5.1. By default, the "Advanced Protection" functionality is activated in the Browser, thanks to which the User's actions are not tracked on websites by tracker scripts (i.e. programmes that can monitor the User's actions on the Internet) and fraudulent websites (i.e. websites that can steal passwords and bank card data).
- 5.2. The User may disable "Advanced Protection", but the Company does not recommend it. Especially in cases when the User uses the Browser to open websites of financial organisations and uses their contacts contained on the User's device to transfer funds.

#### **6. To whom the Company may transfer User's Data**

- 6.1. The Company assures Users that information about them is not shared with any third party, except as expressly provided for in this Policy, other applicable Browser policies, and applicable law.
- 6.2. The Company may transfer User Data to third parties, subject to the purposes and grounds specified in this Policy. Such third parties may include:
  - persons who participate in the provision of services to the User; persons who assist the Company in ensuring the operability and security of the Browser, as well as in carrying out work to improve the Browser and personalise the content for the User; persons who assist the Company in communicating with the User and carrying out various types of newsletters;
  - persons who have legal grounds to process User Data, for example, if the transfer of User Data to third parties is carried out with the User's consent, including if the User Data is necessary to provide the User with the relevant service or fulfil a specific agreement or contract concluded with the User, in particular, mobile operators and/or technological partners acting between the Company and mobile operators;

- any state or local government body to which the Company is obliged to provide information in accordance with applicable law upon request.
- 6.3. The Company may transfer User Data to third parties, subject to the purposes and grounds specified in this Policy. Such third parties may include:
- persons who participate in the provision of services to the User; persons who assist the Company in ensuring the operability and security of the Browser, as well as in carrying out work to improve the Browser and personalise the content for the User; persons who assist the Company in communicating with the User and carrying out various types of newsletters;
  - persons who have legal grounds to process User Data, for example, if the transfer of User Data to third parties is carried out with the User's consent, including if the User Data is necessary to provide the User with the relevant service or fulfil a specific agreement or contract concluded with the User, in particular, mobile operators and/or technological partners acting between the Company and mobile operators;
  - any state or local government body to which the Company is obliged to provide information in accordance with applicable law upon request.
- 6.4. The browser uses the AppMetrica analytics service (Yandex.Metrica for applications) provided by Yandex Limited Liability Company (registered office - 16 L. Tolstogo St., Moscow, 119021, Russia) (hereinafter - Yandex) on the Terms of Service.
- AppMetrica analyses application usage data, including the device on which it is running, the source of installation, conversion rates and statistics about your activity for the purposes of product analytics, campaign analysis and optimisation, and error correction. The information collected in this way cannot identify you.
- Information about your use of the App collected using AppMetrica tools will be transmitted to Yandex in anonymised form and stored on Yandex's server in the EU and the Russian Federation in accordance with [Yandex's privacy policy](#). Yandex will process this information to provide statistics on your use of the App, to compile reports for us on the performance of the App, and to provide other services.
- 6.5. The Browser may store your data in cloud storage provided by T1 Cloud Limited Liability Company (legal address - 13A, Yunost Street, 13A, office 8, Moscow, 111395) taking into account all requirements of the applicable legislation in the field of personal data.
- 6.6. In case of questions, the User can send a message to the Company's support service at [support@loonabrowser.ru](mailto:support@loonabrowser.ru). At the same time, web analytics systems are inextricably linked to the operation of the Browser: in case of withdrawal of consent, the User may have problems using the Browser.

## **7. How the Company processes User Data**

- 7.1. All User Data is processed on the User's device, with the exception of:
- User's data that is transferred to the web analytics system;
  - User's data, which the User has provided to the Company for the purpose of technical support of the User when using the Browser.
- 7.2. The Company processes User Data by collecting, recording, systematising, accumulating, storing, clarifying (updating, changing), extracting, using, transferring (providing, accessing), blocking, deleting, destroying. These operations are carried out both with the use of automation means and without the use of such means.
- 7.3. The User should note that the period of processing of User Data is until the purpose of data processing is achieved, unless otherwise provided for by the legislation of the Russian Federation.

## **8. Saving forms with User Data on websites opened through the Browser**

- 8.1. The functionality of the Browser when autocompleting User Data supports work with the infrastructure of the device, in the form of local secure KeyChain storage and its APIs, which use asymmetric encryption to protect the stored User Data.
- 8.2. This allows the User to securely store User Data that is required for authorisation on websites (including such websites that may store important information sensitive to the User, such as financial institution applications).
- 8.3. When the User accesses the above websites via the Browser, the function
- 8.4. "Autofill", requesting data from the local secure storage, fills in the relevant fields of the website via KeyChain API. The request of data from the local secure storage is accompanied by the User's confirmation by means of authentication using Face ID / Touch ID / Passcode with the configured device security option.
- 8.5. The sharing and storage of this User Data on the User's device must be subject to the User's consent, which the User will provide to the organisation and website to which the User enters their Data.

## **9. How the User can delete the Data**

- 9.1. Use the following guide to delete cookies from the Browser:
  - "Home screen" → "History" → "---" at the bottom of the screen → "History" → Swipe left on the item to be deleted → Pinch the item to be deleted → "Delete" → Press "Clear" → Select time range
  - Home screen → "Settings" → "Clearing History and Data" → "Search History" → Select a time range.
- 9.2. The Company will ensure that all User Data is deleted in cases where:
  - The User has deleted the Data in the Browser by himself/herself using the functionality of the Browser;
  - The user has deleted the Browser from their device;
  - In the case of User Data processed on the Company's servers - if the User exercises his right to withdraw consent to the processing of personal data by sending a message on deletion of the Data to the e-mail address - [support@loonabrowser.ru](mailto:support@loonabrowser.ru) . In this case, the Company will ensure deletion of the User's Data processed on the Company's servers based on the consent of such User.

## **10. How the Company ensures the confidentiality and security of User Data**

- 10.1. The Company takes all necessary technical, organisational and legal measures to ensure the protection of User Data from unauthorised or accidental access, destruction, modification, blocking, copying, distribution, as well as from other unlawful actions.
- 10.2. Technical security measures have been implemented by the Company taking into account the requirements of applicable legislation, the current state of the art, the nature of the information processed and the risks associated with its processing.
- 10.3. Information is processed predominantly automatically without access to it by employees and/or contractors of the Company. If such access is granted to employees or contractors of the Company, it is only to the extent necessary for such persons to fulfil their official duties or duties under a contract with the Company, and such persons are obliged to comply with security requirements when accessing User Data. In order to protect and ensure the confidentiality of data, all employees/contractors comply with internal policies and procedures regarding the

processing of information. These persons shall also comply with all technical and organisational security measures required by applicable law and necessary for the protection of User Data.

- 10.4. The User is obliged to protect his/her device independently. The Company recommends the User to always enable the "Advanced Protection" functionality when using the Browser, as well as to additionally install anti-virus software on their device and regularly check their device for malicious software.

## **11. User's rights**

11.1. Users have the right to:

- access information about yourself, free of charge, through the Browser;
- make changes and corrections to the information about himself/herself by editing it, provided that such changes and corrections contain up-to-date and accurate information;
- delete information about yourself by editing the Data in the Browser, whereby deletion of certain information about yourself by the User from the Browser may result in the inability to provide the User with access to the functionality of the Browser;
- demand from the Company to clarify the User Data, block or destroy it if such information is incomplete, outdated, unreliable, unreasonably obtained or is not necessary for the stated purpose of processing and if the functionality of the Browser does not allow the User to delete such information independently;
- withdraw consent to the processing of User Data;
- on the basis of a request, receive information from the Company regarding the Company's processing of User Data;
- appeal against actions or inactions of the Company to the authorized bodies, in accordance with the procedure stipulated by the applicable legislation.

11.2. The User may contact [support@loonabrowser.ru](mailto:support@loonabrowser.ru) to exercise his/her rights, including those provided for in this Policy.

## **12. Final Clauses**

12.1. By accepting the User Agreement, the User also accepts this Policy, which is an integral part of it. The User confirms that he/she has read the Policy and agrees to the terms and conditions of processing User Data.

12.2. The Company has the right to make changes to the Policy without prior notice. We recommend you to review the Policy regularly, especially in case of new functionality in the Browser.

12.3. The new version of the Policy comes into effect from the moment of its posting for unrestricted access, unless otherwise provided by the new version of the Policy.