

LiTRO – Privacy Policy

The Application collects certain Personal Data from Users.

This document can be printed for reference using the Print command in any browser settings.

Owner and Data Controller

LiTRO Limited Liability Partnership (LiTRO LLP) BIN 190840008516, Postal Code 050040, 3, Mitin street, Medeu district, Almaty

Owner's contact email: info@litro.kz

Categories of Data collected

The categories of Personal Data collected by the Application (either independently or through third parties) include: Trackers; Data on the use of network resources; Allowing access to the Camera; Permission for approximate (short-term) localization; Allowing write-only access to the Photo Library; name; surname; date of birth; phone number; email address; password; city; exact location. Full details of each category of Personal Data collected are provided in the relevant sections of this privacy policy or in special explanatory texts that are displayed before the Data is collected.

Personal data may be provided by the User independently, or, in the case of Usage Data, it may be automatically collected by the Application when using it.

Unless otherwise specified, all Data requested by the Application is mandatory. If the specified Data is not provided, the Application may not be able to provide its services. In cases where the Application directly indicates that certain Data is not required to be provided, Users have the right not to provide the relevant Data without any consequences regarding the availability or operation of the Service.

Users who are unsure which Personal Data is required are advised to contact the Owner.

The Application or the owners of third-party services that use the Application use Cookies (or other tracking tools) solely for the purpose of providing the Service required by the User, as well as for any other purposes specified in this document and in the Rules regarding the use of Cookies (if any).

Users are responsible for any Personal Data of third parties that they receive, publish or provide to others, obtained, published or transmitted through this Application, and confirm that they have obtained the consent of the relevant third party to provide the Data to the Owner.

Method and place of Data processing

Processing methods

The Owner takes adequate security measures to prevent unauthorized access to, disclosure, modification or unauthorized destruction of the Data.

Data processing is carried out using computers and/or information technology (IT)-enabled facilities in accordance with organizational procedures and methods strictly related to the stated purposes. In some cases, Data may be available, in addition to the Owner, to certain categories of responsible persons who are involved in the operation of this Application (administration, sales department, marketing department, legal department, system administrators), or to third parties (such as third party technical service providers, postal organizations, hosting service providers, information technology supply companies, communication services) which the Owner instructs, if necessary, to perform the functions of a Data Processor. An updated list of named persons and parties can be requested from the Owner at any time.

Legal basis for processing

The Owner may process Personal Data relating to Users if one of the criteria below applies:

Users have given their consent to use the Data for one or more specific purposes. Note: Some jurisdictions may permit the Owner to process Personal Data until the User objects ("opt-out"),

without having to rely on consent or any other legal basis listed below. However, the above does not apply where the processing of Personal Data is subject to European data protection legislation;

provision of Data is necessary to fulfill the agreement with the User and (or) any obligations preceding the conclusion of the contract;

processing is necessary to fulfill a statutory obligation imposed on the Owner;

processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the Owner;

processing is necessary to ensure the legitimate interests of the Owner or a third party.

In any case, the Owner will be happy to help clarify the specific legal basis applicable to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Place

The data is processed at the Owner's operating offices and in any other places where the parties involved in their processing are located.

Depending on the User's location, data transfers may involve the transfer of User Data to a country outside of the User's own country. For more detailed information about the place of processing of such transferred Data, Users can refer to the section containing detailed information about the processing of Personal Data.

Users also have the right to become aware of the legal basis for the transfer of Data to a country outside the European Union or to any international organization governed by public international law or established by two or more countries, such as the UN, as well as the security measures taken by the Owner to protect their Data.

If such a transfer occurs, Users may obtain additional information by consulting the relevant sections of this document or request it from the Owner using the information provided in the contact information section.

Storage period

Personal data must be processed and stored for as long as it is required for the purposes for which it was collected.

Thus:

Personal Data collected for purposes related to the execution of the contract between the Owner and the User is stored until such contract is fully executed.

Personal data collected for the purposes of the Owner's legitimate interests is retained for as long as it is necessary to fulfill such purposes. Users can find specific information about the legitimate interests pursued by the Owner in the relevant sections of this document or by contacting the Owner. The Owner may be permitted to retain Personal Data for a longer period of time if the User has consented to such processing, until such consent is withdrawn. In addition, the Owner may be required to retain Personal Data for a longer period of time if required to do so to comply with a legal obligation or by order of a government authority.

Upon expiration of the storage period, Personal Data is deleted. Therefore, the right of access, the right to erasure, the right to rectification and the right to data portability cannot be exercised after the expiration of the storage period.

Purposes of processing

The collection of Data relating to the User is carried out in order to enable the Owner to provide the Service, comply with legal requirements, respond to requests from law enforcement agencies, protect its rights and interests (or the rights and interests of Users or third parties), identify any malicious or fraudulent activities, and also for the following purposes: Analytics, Permissions to access data stored on the User's device, Registration and authentication are carried out directly by the Application, Registration and authentication, Location-based interactions and Establishing contact with the User. Users can find specific information about the Personal Data used to achieve each purpose in the section "Detailed Information on the Personal Data Processing".

Permissions for access to data stored on the User's device

Depending on the User's specific device, the Application may request certain permissions that will allow it to access the User's Device Data, as described below.

The specified permissions are provided by the User before any information is processed. Once access permission has been granted, it can be revoked by the User at any time. To revoke permission, the User can use the system settings or contact the Owner in accordance with the contact information specified in this document.

The procedure for controlling access permissions may vary depending on the devices and software used by the User.

Please note that revoking one or more access permissions may affect the correct functioning of the Application service.

If the User provides the permissions below, the relevant Personal Data will be processed (accessed, modified or deleted) using the Application service.

Allowing access to the Camera

It is used to access the camera, photos and videos stored on the device.

Allowing write-only access to the Photo Library

It is used to gain write-only access to the User's photo library.

Permission for Approximate (short-term) localization

It is used to gain access to the approximate location of the User's device. The Application service has the right to collect, use and share the User's location for the purpose of providing location-related services.

The geographical location of the User is determined on a variable basis. This means that the Application service is not able to continuously determine the exact location of the User.

Detailed information about the processing of Personal Data

Personal data is collected for the following purposes and using the following services:

Analytics

The services described in this section enable the Owner to monitor and analyze web traffic and can be used to record User actions.

Appsflyer (AppsFlyer Ltd)

Appsflyer is an analytical service provided by AppsFlyer Ltd.

Processed personal data: Data on the use of network resources; Trackers.

[Place of processing: Israel – Privacy Policy – Opt-Out.](#)

Location-based interactions

Geolocation not in continuous mode (Application)

The Application may collect, use and transmit to other parties the User's location data for the purpose of providing location-based services.

Most web browsers and devices provide a means to override this feature by default. If the appropriate permission is explicitly granted, the Application may record data about the User's location.

The User's geographic location is determined in a non-continuous manner, either by a specific request from the User, or when the User does not indicate their current location in the appropriate field and allows the application to determine the location automatically.

Personal data processed: exact location.

Permissions for access to data stored on the User's device

Use of the Application service requires the User to provide separate permissions to access the Information stored on his device under the conditions set out below.

Permissions for access to data stored on the User's device (Application)

Use of the Application service requires the User to provide individual permissions to access the Information stored on his device under the conditions in this document.

Personal data processed: Permission to access the Camera; Allowing write-only access to the Photo Library; Permission for approximate (short-term) localization.

Registration and authentication are performed directly by the Application

As a result of Users completing the registration or authentication procedure, the Application receives permission to identify them and provide them with access to specialized services. Personal Data is collected and stored for registration or identification purposes only. Only the Data that is necessary to provide the service requested by Users is collected.

Direct Registration (Application)

The Application receives Personal Data directly from the User as a result of filling out the registration form during the registration procedure.

Personal data processed: email address; city; date of birth; name; phone number; password; surname.

Registration and Authentication

As a result of Users completing the registration or authentication procedure, the Application receives permission to identify them and provide them with access to specialized services.

Subject to the following conditions, third parties may provide registration and authentication services. In this case, the Application is able to access some Data stored on the servers of these third-party services for the purpose of registration and authentication.

Some of the services listed below may also collect Personal Data for targeting and profiling purposes; For more information, see the description of each service.

Sign in with Apple (Apple Inc.)

Sign In with Apple is a registration and authentication service provided by Apple Inc. In cases where Users are required to provide their email address, Sign in with Apple may, on behalf of Users, generate a private variable address that automatically routes messages to their verified personal email account [without thereby providing the Owner with access to their actual email](#)

[address. Personal data processed: email address; name; phone number; surname. Place of processing: USA – Rules for ensuring the privacy of personal data.](#)

Google OAuth (Google LLC)

Google OAuth is a registration and authentication service provided by Google LLC and associated with the Google network.

Processed personal data: various categories of Data specified in the rules for ensuring the privacy of personal data of the service.

[Place of processing: USA – Rules for ensuring the privacy of personal data.](#)

Establishing contact with the User

Phone contact (Application)

Users who provide their phone number may be contacted for commercial or promotional purposes regarding offers related to the Application, as well as for the purpose of fulfilling requests for technical support.

Personal data processed: phone number.

Additional information on the processing of Personal Data

Notifications from the server to the client

The Application may send notifications from its servers to the User to achieve the purposes specified in the privacy policy.

Users can, in most cases, opt out of receiving server notifications by setting appropriate settings on their devices, such as notification settings for mobile phones, and then change those settings so that the Application, some or all of the Applications on a particular device have their own settings.

Users should be aware that disabling server notifications may adversely affect the benefits that the Application provides.

Selling goods and services via the Internet

The collected Personal Data is used to provide the User with services or to sell goods, including payment and possible delivery.

Personal data collected for the purpose of making a payment may relate to a credit card, bank account used for non-cash payments, or any other payment methods provided. The nature of the Data that the Application collects depends on the payment system used.

User Rights

Users may exercise certain rights in relation to their Data processed by the Owner.

In particular, Users have the right to perform the following actions within the limits provided by law:

Withdraw their consent at any time. Users have the right to withdraw consent if they have previously given their consent to the processing of their Personal Data.

Object to the processing of their data. Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than their consent. More detailed information on this issue is provided in the relevant section below.

Get access to their Data. Users have the right to find out whether data is being processed by the Owner, to obtain information about certain aspects of the processing and to receive a copy of the processed Data.

Check the Data and request correction. Users have the right to check the accuracy of their Data and ask for it to be updated or corrected.

Restrict the processing of their Data. Users have the right to restrict the processing of their Data. In this case, the Owner will not process their Data for any purpose other than storing it.

Request that their Personal Data be deleted or otherwise destroyed.

Users have the right to obtain the Owner to delete their Data.

Receive their Data and transfer it to another controller. Users have the right to receive their Data in a structured, commonly used and machine-readable format and, if technically feasible, to have it transmitted to another controller without hindrance.

Make a complaint. Users have the right to lodge a complaint with the competent data protection authority.

Information about the right to object to the processing of Data

Where Personal Data is processed for reasons of public interest, in the exercise of official authority vested in the Owner or for the purposes of the legitimate interests pursued by the Owner, Users may object to such processing by providing a related ground in support of the objection their specific situation.

However, Users should be aware that if their Personal Data is processed for direct marketing purposes, Users may object to such processing at any time and free of charge without providing any justification. Upon receipt of the User's objection to processing for direct marketing purposes, the processing of Personal Data for these purposes is terminated. The User can find out whether the Owner processes Personal Data for direct marketing purposes by reading the relevant sections of this document.

The procedure for exercising these rights

Any requests regarding the exercise of User rights can be directed to the Owner using the contact details provided in this document. There is no charge for processing these requests. The Owner will respond to them as soon as possible, not exceeding one month, providing Users with the information required by law. The Owner will inform each recipient to whom the Personal Data (if any) was disclosed of any correction or deletion of Personal Data or restriction of its processing, unless this would be impossible or would require disproportionate effort. At the request of Users, the Owner will inform them about these recipients.

Additional information about Data collection and processing

Lawsuits

The User's personal data may be used by the Owner in legal proceedings or at stages leading to possible recourse to court due to the fact that the Application or related Services were used inappropriately.

The User declares his awareness that the Owner may be forced to provide Personal Data at the request of government authorities.

Additional information about the User's Personal Data

In addition to the information contained in this privacy policy, the Application may provide, at the User's request, additional and contextual information regarding specific Services or the collection and processing of Personal Data.

System logs and maintenance

In order to ensure the operation of the system and its maintenance, the Application and any third-party services may collect files that record how the Application interacts with Users (system logs), or use other Personal Data (in particular, IP address) for this purpose.

Information not included in these rules

Further information regarding the collection or processing of Personal Data may be requested from the Owner at any time. See contact details at the beginning of this document.

How Do Not Track requests are processed

The application does not support Do Not Track requests.

To determine whether any third-party service you use supports Do Not Track requests, please review their applicable privacy rules.

Amendments to these rules for ensuring the privacy of personal data

The Owner reserves the right to make changes to these privacy rules at any time by notifying Users on this page and possibly within this Application and (or) – to the extent technically and legally possible – by sending a notification to Users with using any contact information available to the Owner. It is strongly recommended that you check this page frequently, referring to the last modified date indicated below.

In the event that changes affect processing activities carried out on the basis of the User's consent, the Owner must re-obtain consent from the User if necessary.

Definitions of terms and references to legal provisions

Personal data (or Data)

Any information that directly, indirectly or in connection with other information – including personal identification number – provides the ability to identify or recognize an individual.

(Network resource) usage data

Information that is automatically collected by the Application or third-party services that the Application uses), in particular: IP addresses or domain names of computers of Users who use the Application, URI addresses addresses, time of making the request, method of making the request to server, the size of the file received in response, a numeric code indicating the status of the server response (success, error, etc.), country of origin, characteristics of the browser and operating system used by the User, various information about the time of each visit (for example, time spent on each page of the Application), and information about movements within the Application with a separate indication of the order of visiting pages, as well as other parameters of the device's operating system and (or) the User's computing and information environment.

User

An individual using the Application who, unless otherwise stated, is the same as the Data Subject.

Data subject

The individual to whom the Personal Data relates.

Data Processor (or Data Administrator)

An individual or legal entity, public authority, agency or other body that processes personal data on behalf of the Controller.

Data Controller (or Owner)

An individual or legal entity, government agency, agency or other entity that, alone or jointly with others, determines the purpose and means of processing Personal Data, including the security measures relating to how the Application is operated and used. Unless otherwise stated, the Data Controller is the Owner, i.e. the person who owns the Application.

Application

The means by which the User's Personal Data is collected and processed.

Service

The service provided by the Application as described in the relevant terms and conditions (if any) and on this website or in this application.

European Union (or EU)

Unless otherwise specified, all references to the European Union contained in this document include all currently existing member countries of the European Union and the European Economic Area.

Cookie

Cookies are Trackers consisting of small sets of data stored in the User's browser.

Tracker

A tracker is any technology (for example, cookies, unique identifiers, web beacons, embedded scripts, e-tags and fingerprints) that allows to track the actions of Users, for example, accessing information on the User's device and storing it on that device.

Legal information

This privacy statement has been prepared on the basis of the provisions of various legislation, including Article 13/14 of Regulation (EU) 2016/679 ("General Regulations on the Protection of Personal Data").

Unless otherwise stated herein, the privacy policy applies solely to the Application.

Last updated: February 09, 2024