

# Privacy Policy

We take your privacy very seriously. We are committed to safeguarding your privacy, and this privacy policy explains our data collection, use, and disclosure practices.

This policy covers:

- important information and who we are
- the personal data we collect
- how and why we collect and use your personal data
- why we process your personal data
- when and why we will disclose your personal data to the MentorX Group or other organizations
- international transfers
- the rights and choices you have when it comes to your personal data
- why we use cookies
- the steps we take to ensure your information is kept secure and confidential
- how long we will hold your information for
- your legal rights

## 1. IMPORTANT INFORMATION AND WHO WE ARE

The Service is owned and operated by MentorX (collectively referred to as "MentorX", "we", "us" or "our" in this Privacy Policy), an Individual Entrepreneur (IE), IE ARRIETA VILLALBA OSCAR ANDRES, registered in Russia with taxpayer identification number 971801166432 and with its registered address at City Place Moscow, Russia. St. Pogonnyy Proyezd, 5.

MentorX provides its service (the "Service"), subject to the Terms of Service, and the following Privacy Policy. We may update this Privacy Policy from time to time. All changes will be posted on our website (the "Site"). You can review the most current version of the Privacy Policy at any

time here <https://mentorx.com/privacy.pdf>. Your continued use of the Service or the Site after any such changes have been made constitutes your acceptance of the new Privacy Policy. This website is not intended for children and we do not knowingly collect data relating to children. Words beginning with capital letters in this Privacy Policy which are not defined in this Privacy Policy are defined in the Terms of Service.

MentorX is the controller and responsible for your personal data. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the [Russian supervisory authority](#) for data protection issues. We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

## **2. INFORMATION WE COLLECT AND RECEIVE**

When you create an account in the Service, MentorX collects personal data that you submit such as your username, email address, spoken and studied languages and any other personal or preference information that you optionally enter into the Service, as well as your profile picture.

MentorX also collects and generates a number of other areas of usage information automatically which includes; services metadata, log data, device information, IP addresses, third-party data and cookie information.

We also collect, use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice. We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

We may contact you to ask you to participate in research. By participating in research with us, you confirm that you have read and agreed to the research conditions. Some of our research will use information from your Service account in order to give us accurate results. Results will be aggregated and may be used for marketing purposes. No personal details will be shared with third parties. All your personal information will be stored securely for the duration of the research and deleted after the publication of the results. We store your personal information only on secure servers that are held in secure facilities and have up-to-date firewall protection. If you decide to participate in any research, your participation is voluntary and you can withdraw at any time. If you'd like to withdraw, please send an email to

support@mentorx.ru and your request will be processed on the following working day in Russia. All your data will then be deleted from our database and excluded from the research.

When you use the Service, you may set up your personal profile, form relationships, send and receive messages, perform searches and queries, enrol in events and courses, and transmit information through various channels.

There is no statutory or contractual obligation to provide this data, however, where the data is not provided, we will be unable to provide the service.

### **3. INFORMATION USE**

MentorX will use your personal data in furtherance of our legitimate interests for the following general purposes:

- (i) to provide, update, maintain and protect our services, websites, apps and business
- (ii) as required by applicable law, legal process or regulation
- (iii) to respond to your questions and comments
- (iv) to send marketing and transactional communications, including but not limited to email, push notifications, SMS and in-app messages, about the Service
- (v) statistical purposes
- (vi) for billing, account management and other administrative matters

(vii) to investigate and help prevent security issues and abuse

(viii) other purposes as described to you at the point of collection

MentorX uses such information to customise the marketing and Content you see, fulfil your requests for products and services, improve our Service to you, contact you, conduct research, and provide anonymised reporting for internal purposes and for external clients such as advertisers. If you choose share a MentorX invite link with a friend and they click the link they will see your profile image (if you have created one) and name on a landing page within MentorX. You can delete and change this data at any time within your profile settings. No other information is visible.

Please note that if you enter payment details into the Service when purchasing a Paid Service (including any Premium membership), MentorX itself does not receive or store such payment information, and as such information is received, it is stored and used by our payment service providers for the purpose of completing the purchase.

You can opt out of promotional communication initiated by MentorX when registering for the Service. You can also opt out of all communications, email, push notifications and SMS, from the communication itself or from your preference settings.

For users registered through an organisation using an organisation email address, your email data would have been provided to us by that data controller. In this case you will have received a communication showing how to sign up. You can unsubscribe from these communications at any time.

#### **4. STORAGE AND TRANSFER OF YOUR PERSONAL DATA**

We store your personal information only on secure servers that are held in secure facilities and have up-to-date firewall protection. Whenever we transfer your personal data from one server to another, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission. For further details, see European Commission: Adequacy of the protection of personal data in non-EU countries.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe. For further details, see European Commission: Model contracts for the transfer of personal data to third countries.

#### **5. RETENTION**

MentorX will retain your personal data for as long as we need to in order to fulfil legitimate business interests, conduct audits, comply with (and demonstrate compliance with) legal obligations, resolve disputes and enforce our agreements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. You have the right to delete your personal data by sending an email requesting so to [support@mentorx.ru](mailto:support@mentorx.ru). Please note in this case any financial information will be kept in accordance with local laws.

## **6. COOKIES**

A cookie is a small amount of data, which often includes an anonymous unique identifier that is sent to your browser from a website's computers and stored on your computer's hard drive. You can configure your browser to accept all cookies, reject all cookies or notify you when a cookie is set. If you want to delete any cookies that are already on your computer, please refer to the instructions for your browser to locate the file or directory that stores cookies. If you reject all cookies, you may not be able to use some features of the Service.

MentorX lets other entities that show advertisements or provide services on some of our web pages set and access their cookies on your computer. Other entities' use of their cookies is subject to their own privacy policies, and not this policy. Advertisers or other entities do not have access to MentorX's cookies.

## **7. DISCLOSURE OF PERSONAL INFORMATION**

We display your Profile information (except for your email address and password) to people browsing for friends, and to support other Site functions. MentorX does not rent, sell, or share personal information about you with third parties except to provide products or services you've requested, when we have your permission, or in the following circumstances:

- where MentorX is responding to a subpoena, court order, or legal process, or to establish or exercise our legal rights or to defend ourselves against legal claims;

- where MentorX believes it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities, suspected fraud, situations involving potential threats to the physical safety of any person, violations of MentorX's Terms of Service, or as otherwise required by law;
- where you are using a Paid Service (including a Premium membership) in your capacity as a student or an employee or other third party using the Paid Service, we may in such circumstances share your personal information with your educational establishment, your employer or any third party paying for the Service on your behalf (as the case may be) to allow them to monitor your use of the Paid Service;
- where MentorX transfers information about you if MentorX is acquired by or merged with another company. If this happens, MentorX will notify you before information about you is transferred and becomes subject to a different privacy policy.

We may share your data including email addresses with other data processors such as Facebook, Google, Braze and Snapchat to provide targeted advertising. For users with a Premium membership sponsored through an organisation we will not share your data for advertising purposes. We also use analytical tools such as Intercom, Braze and Amplitude which in some cases may see your personal data such as IP addresses. In some of these cases the data is transferred out of the EEA.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

Please remember that whenever you disclose personal information online, that information can be collected and used by others. By posting personal information online that is publicly accessible, you may receive unsolicited messages from other parties as a result.



## **8. THIRD-PARTY ADVERTISING**

MentorX sometimes displays targeted advertisements based on personal information. Advertisers may assume that people who interact with, view, or click targeted ads meet the relevant targeting criteria (for example, men ages 18-24 from a particular geographic area). MentorX does not provide any personal information to the advertiser when you interact with or view a targeted ad. However, by interacting with or viewing an ad you are consenting to the possibility that the advertiser will make the assumption that you meet the targeting criteria used to display the ad.

## **9. CONFIDENTIALITY AND SECURITY**

We shall take measures to protect personal data using reasonable and industry standard security safeguards against loss or theft, as well as unauthorised access, disclosure, copying, improper use or modification.

Your personal data is password protected and, other as set out in this Privacy Policy, can only be seen by you and us. You agree to keep your password(s) confidential and not to disclose them to anyone else, or allow them to be disclosed.

MentorX limits access to personal information about you to employees who MentorX reasonably believes need to come into contact with that information, to provide products or the Service to you, or in order to do their jobs.

MentorX has physical, electronic, and procedural safeguards that comply with regulations to protect personal information about you. However, data

transmissions over the internet cannot be guaranteed to be 100% secure. Consequently, MentorX cannot ensure or warrant the security of information you transmit to MentorX. In particular, by accessing and using the Service, you do so at your sole risk and you are responsible for restricting access to your computer and ensuring that your computer is free from all types of malicious code, spyware, viruses, Trojans, etc. that may track any data you enter into the Service, including email address and payment related information. We are not responsible for any loss or damage arising from the user's failure to comply with this paragraph.

However, when you pay for a Paid Service, MentorX uses secure payment service providers to make sure that your payments are secure.

MentorX is protected by reCAPTCHA and is subject to the Google [Privacy Policy](#) and [Terms of Service](#).

## **10. THIRD-PARTY WEBSITES**

Where the Site, or any other part of the Service, links to other websites, such other websites do not operate under this Privacy Policy. MentorX recommends that you examine the privacy statements posted on such other websites to understand their procedures for collecting, using, and disclosing personal data.

## **11. YOUR LEGAL RIGHTS**

You have the right to:

Request access to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.

Request correction of the personal data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.

Request erasure of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

Object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.

Request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to form a contract with you.

Withdraw consent at any time where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us as detailed below. You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to

ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## **12. CONTACTING US**

You may obtain a copy of the personal data held about you that you provide through the Site or otherwise request that MentorX updates, makes changes or deletes personal information by sending an email to [support@mentorx.ru](mailto:support@mentorx.ru). If you have any questions or suggestions regarding our Privacy Policy, you can contact MentorX by email at [support@mentorx.ru](mailto:support@mentorx.ru)

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