

Firststep Privacy Policy

Reduction from 20.01.2020

1. The Basics

1.1. Privacy Policy is the official document of the service and determine the processing and protecting information about individuals using services provided by Firststep;

1.2. The purpose of the rules is protection of the information about users, including their personal profiles in the mobile application and in the web-version from unauthorized access;

1.3. Treatment related to the collection, storage, dissemination and protection of the information about users of the service are regulated by the rules, other official documents of the service and the current legislation of the Russian Federation;

1.4. The current version of the rules is also a public document, accessible to any Internet user when clicking <https://firststep.love/privacy>. The Service Owner has the right to make changes to the rules unilaterally and without any notification to users. Therefore, we recommend you to review the current information in the appropriate section of the application settings or on the site <https://firststep.love/privacy> from time to time;

1.5. The rules are developed and used in accordance with the Firststep User Agreement, posted on the <https://firststep.love/terms>. In case of any contradictions between the rules and other official documents of the service, these rules must be applied;

1.6. The user expresses his full agreement with the terms of the rules for the provision of Firststep service by registering or authorizing;

1.7. In case of disagreement of the user with the terms of these rules, the use of the service in any form must be immediately interrupted.

2. Privacy for Members

2.1. Providing services on iOS and Android platforms, as well as its web-version (hereinafter referred as Customer Services), Moderators, acting reasonably and conscientiously, believe that the User:

- has all the necessary rights to enable him to register and use the service;
- indicates reliable personal information at levels necessary to use the customer services;
- realizes that the personal information placed by the user, can become accessible to other users, can be copied and distributed by such users;
- realizes that some types of information transferred to other users can not be deleted by the User;
- got acquainted with these Rules, expresses his consent to them and assumes the rights and duties indicated in them.

2.2. Moderators do not check the reliability of the received information about users, except when such a check is necessary in order to fulfill the obligations to the user.

3. Objectives of the Processing Users Information

3.1. The Service processes and stores information about users, their personal data, in order to fulfill the Service's obligations to Users regarding the use of the Customer Services.

3.2. The Service stores the following personal information: name, age, sex, phone number, e-mail address for the whole period of using the service and within 6 months after the account is deleted. (When deleting an account, it is considered that the user refuses of providing the Privacy Policy and the Firststep User Agreement).

4. User's Personal Data

4.1. Firststep user's personal data includes:

4.1.1. User-provided minimum requirements for registration on the service: name, gender, mobile phone number and / or e-mail address;

4.1.2. Editing section, the possibility of changes to the discretion of the user search settings, favorite establishments and information in the "About Me" section provided to users through the profile. If you want to change the name or age, the user should write to the support@firststep.love with a detailed explanation and attached photo or scanner of the identity document (passport or driver's license). The right to change the name and age of the service is reserved and might be refused without explanation.

4.2 Other user's information. The service can process other user's information which includes:

4.2.1. Additional data obtained when accessing the service, including data on technical facilities (devices), technological interaction with the service (including IP addresses, operating system types, phone models, browser type (applicable for web-version), data from phone's contacts, data received from access to the phone's camera, etc.) for the purpose of improving the service;

4.2.2. Information automatically received when accessing the Service using bookmarks (cookies);

4.2.3. Information received as a result of the user's actions on the Service (in particular, information about the "About Me" section, the invitations from other users, sending messages to other users, blocking/unlocking users from the blacklist, sending reports while blocking, information about invitations to establishments).

5. Processing User's Information

5.1. Processing of personal data is based on the following principles:

- Legality of the purposes and methods of processing personal data;
- Integrity;
- Conformance the objectives of processing personal data to the objectives predetermined when collecting personal data, as well as the authority of Moderators;
- Conformance of the volume and nature of the processed personal data, methods of processing personal data to the purposes of processing personal data;
- Inadmissibility of combining databases created for incompatible objectives with databases containing personal data.

5.1.1. Terms and objectives of processing personal data. Moderators process the user's personal data in order to use the agreement between the Service (represented by the service owner and moderators) and the User for the service provisions (clause 2.2 of the Firststep User Agreement <https://firststep.love/terms>). By virtue of Art 6 of the Federal Law of 27.07.2006 No. 152-FA "On Personal Data", there is no need for a special consent of the user to process his personal data; by virtue of cl. 2n.2 of Art. 22 of specified law, Moderators have the right to process personal data without notifying the authorized body which protecting the subject rights on personal data;

5.1.2. Collection of personal data. The collection of the User's personal data is carried out in the Service upon registration, as well as further when the user enters additional information on personal data with the help of the Service. Personal data (clause 4.1.1.) are provided by the User and represent minimal requirements for registration. Personal data (clause 4.1.2.) is additionally provided by the User on their own initiative using the "Edit" tab in the "Edit Profile" section;

5.1.3. Storage and use of personal data. Personal data of users is stored exclusively on electronic devices and processed using automated systems, except for cases when manual processing of personal data is necessary relating to the implementation of legal requirements;

5.1.4. Transfer of personal data. Personal data of Users is not transferred to any third parties, except for the cases directly provided by the Rules.

When specifying the user or with the consent of the user, there is a possibility to transfer the user's personal data to third parties who are Moderator's counterparties with the condition that such counterparties take obligations to ensure the confidentiality of the received information, in particular, when using applications.

In order to execute the agreement between the User and Moderators and provide the User with access to the use of the Service functionality, Moderators develop the provided services and products, develop and introduce new ones, optimizing the quality of services and products, improving the available Service functionality.

To ensure the implementation of these objectives, the User agrees to the Moderator's implementation of the Service in compliance with the applicable law of collection, storage, accumulation, systematization, extraction, comparison, usage, filling (clarification) of their data, as well as receiving and transferring to the affiliated parties and partners the results of automated processing of such data using different models of information evaluation, in the form of integer and / or text values and identifiers corresponding to those specified in the evaluation criteria for Moderators's processing data and / or those specified in this paragraph.

5.1.5. Destruction of personal data.

Cases when personal data of the user is destroyed:

- User's profile self-removal;
- User's profile self-removal using the option "delete account" available in the "Settings" section;
- Removal by Moderators of the information placed by the User, as well as the User profile in the cases established by the rules of the User Agreement <https://firststep.love/terms>.

In case of deletion the profile, Moderators store on electronic devices personal and other necessary data of the User during the necessary period established by the current legislation of the Russian Federation. In case of self-deletion of the profile, the User has the right to restore his profile within 6 months from the date of self-deletion;

5.2. By placing information on the profile, including personal data, the User realizes and agrees that the information can be accessible to other users taking into account the architecture features and the functionality of the Service.

6. Users Rights and Responsibilities

6.1. Users rights:

- To provide gratuitous and free access to personal data by uploading profiles on the service using a login and password;
- Independently make changes and corrections to personal information in the profile, provided that such changes and corrections contain up-to-date and reliable information;
- Delete personal information from the profile;
- Require the Administration to clarify personal data, block it or destroy it if such data is incomplete, outdated, unreliable, illegally obtained or not necessary for the purpose of processing; if it is impossible to perform the actions independently on the basis of a request, get information from Moderators regarding the processing of personal data.

6.2. Since the Service is a universal means of communication to search for acquaintances with people, the following information about the registered User is always available to any registered User of the Service:

- User name;
- Date of birth (Age);
- Height (indicated independently);
- Three favorable establishments (restaurants, bars, coffee houses, etc.);
- Photos uploaded by users or downloaded from social networks during authorization through social networks;
- Information in the section "About Me" (describe your favorite world cuisine and drinks), indicated by the user;
- The distance to the user is expressed in metric units (km).

7. Protection Measures on Personal Data

7.1 Moderators take technical, organizational and legal measures to ensure the protection of the User's personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions;

7.2. To authorize access to the Service, the login (e-mail address or mobile phone number) and the User's password are used. The User is responsible for the safety of this information. The user does not have the right to transfer login and password to third parties, and also must take measures to ensure their confidentiality;

7.3. In order to provide more reliable protection of Users personal information, Moderators use the profile gridding-system to a mobile phone. To implement this system, the User must provide the Moderators with their mobile phone number;

Within the profile gridding-system to a mobile phone, the User can restore access to the page using the recovery code contained in the SMS message that the User receives on his mobile phone in case of login/password loss.

In order to reduce the probability of third-party use of logins and passwords for sending spam on their behalf, in case the user's login and password are entered using an unusual server for the User (in particular, a foreign country server), Moderators block access to the User's account by means of a message with a demand to indicate some figures of the User's mobile phone. After three unsuccessful attempts to enter numbers, the ability to access a personal page using this server is blocked for 4 hours.

8. Limitation of Liability

8.1. The Rules do not apply to actions and Internet resources of third parties. Moderators and the Service Owner are not responsible for any actions of third parties who got an access to information about the User as a result of using the Internet or the Customer Services. Moderators recommend Users to take a responsible approach to the amount of personal information placed on the Service.

9. Appeals by Users

9.1. Users are entitled to send their requests to Moderators, including requests regarding usage of personal data to the following e-mail address: support@firststep.love

9.2 The request sent by the user must contain the following information:

- Number of the main identity document of the user or his representative;
- Information on the date of issue of the document and the authority;
- Signature of the user or his representative.

9.3. Moderators are obliged to review and forward the response to the request of the user within 60 days from the receipt of the request.

9.4. All correspondence received by Moderators from users (appeals in writing or electronic form) refers to information of limited access and is not disclosed without the written consent of the User. Personal data and other information about the User who sent the request can not be used without the special consent of the User in any other way than to respond to the subject of the received request or in cases directly provided by law.