# POLICY ON PROCESSING AND ENSURING PROTECTION OF PERSONAL DATA (PRIVACY POLICY)

We invite you to read the document below on how we process personal data and protect privacy.

This Policy is effective as of January 1, 2024, and constitutes the most recent version as of its publication. The Policy may be updated at any time by publishing a new version on <a href="https://hudx.pro/en/downloads/privacy">https://hudx.pro/en/downloads/privacy</a>.

## **§0. DEFINITIONS**

For the purposes of this Privacy Policy, the following terms are defined as follows:

**Personal Data:** Any information that relates to an identified or identifiable natural person ("data subject"). Examples include your name, email address, IP address, and any information you voluntarily submit to us.

**Processing:** Any operation performed on personal data, such as collection, storage, use, disclosure, transfer, or deletion. "Data Subject": The individual to whom the personal data relates (you, as the user of our services).

**Data Controller:** The entity which determines the purposes and means of processing personal data (in this case, HudX / Maxim Chepkasov).

**Consent:** Freely given, specific, informed, and unambiguous indication of the data subject's wishes by which they signify agreement to the processing of their personal data. Privacy Policy.

**Contract:** A legally binding agreement between HudX and the data subject, under which processing may be required to fulfill the obligations.

**Legitimate Interests:** Reasonable purposes for processing personal data that are necessary for business activities, unless overridden by the individual's rights.

**Third Party:** Any entity other than the data subject or the data controller, which may receive personal data under legal or contractual terms.

**Cookies:** Small files placed on your device that store information about your usage of a website and help improve your experience.

**Anonymization:** The process of removing or modifying personal data so that individuals can

no longer be identified, directly or indirectly.

**Pseudonymization:** Processing of personal data in such a way that it can no longer be attributed to a specific data subject without additional information, which is kept separately.

**Supervisory Authority:** An independent public authority in the EU or UK responsible for monitoring the application of data protection laws (e.g., ICO in the UK, CNIL in France).

**International Data Transfer:** The movement of personal data outside of the European Economic Area (EEA) or the UK.

**GDPR:** Is a commonly used abbreviation of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46 / EC (hereinafter referred to as General Data Protection Regulation). GDPR, outlays not only for information obligations and obligations related to the security of data processing, but also indicates what rights you are entitled to. This document presents information on how we process your personal data.

## §1. WHO WE ARE

HudX is a project operated by Maxim Chepkasov, a self-employed entrepreneur (sole trader) based in the Russian Federation. HudX specializes in the design of custom in-game user interfaces (HUDs), broadcast graphics, and custom software development. HudX is not affiliated with, endorsed by, or in any way officially connected to Valve Corporation, Riot Games, EA Games, Respawn Entertainment, Level Infinite, Krafton, VNG Games, PUBG Studios or Psyonix, or any other game developers or publishers. All trademarks are the property of their respective owners.

# §2. WHAT PERSONAL DATA WE COLLECT

We may collect the following types of personal data:

Name and surname
Email address - Uploaded files (images, documents, etc.)
Photographs and text documents
IP address
Browser type and version
Device information and usage data
Cookies and analytics identifiers (Google Analytics, Yandex Metrica)

# §3. PURPOSES OF PROCESSING

We process personal data for the following purposes:

To provide access to our services and content

To communicate with users and respond to inquiries Privacy Policy

To improve website functionality and user experience

To analyze traffic using cookies and analytics tools

To comply with legal obligations

To enforce terms and conditions or contractual obligations

#### §4. LEGAL BASES FOR PROCESSING

Under Article 6 of the GDPR, we rely on the following legal bases:

Consent (Art. 6(1)(a)): For optional uses such as analytics cookies or newsletter subscription

Contract (Art. 6(1)(b)): To fulfill our agreement with you (e.g., service delivery)

Legal obligation (Art. 6(1)(c)): When required by applicable law

Legitimate interests (Art. 6(1)(f)): For improving service and website performance (provided it does not override your rights)

#### §5. YOUR PRIVACY RIGHTS (GDPR CHAPTER III)

You have the following rights:

Right to Access – You may request a copy of your data.

Right to Rectification – You may request corrections to inaccurate data.

Right to Erasure – ("Right to be Forgotten") – Under certain conditions.

Right to Restrict Processing

Right to Data Portability – In a machine-readable format.

Right to Object – To processing based on legitimate interests or for direct marketing.

Right to Withdraw Consent – At any time, without affecting past processing.

Right to Lodge a Complaint – With a Supervisory Authority, such as the ICO (UK) or CNIL (France).

To exercise these rights, email us at <a href="https://hudxvisual@gmail.com">hudxvisual@gmail.com</a>. We will respond within one month (extendable by two months if necessary).

You may withdraw your consent to data processing at any time by sending an email to <a href="https://hudxvisual@gmail.com">hudxvisual@gmail.com</a> with the subject line "Withdrawal of Consent". Upon receipt, we will stop processing your data unless otherwise required by applicable laws. Withdrawing your consent does not affect the lawfulness of processing based on consent before its withdrawal.

We will delete or anonymize your data within 10 business days of receiving a verified deletion request, unless otherwise required by law.

# §6. COOKIES AND TRACKING TECHNOLOGIES

We use cookies and similar technologies for performance analytics and personalization.

These

include:

Google Analytics

Yandex Metrica

You may manage or disable cookies through your browser settings. We use a Cookie Banner to collect explicit consent before placing non-essential cookies (e.g., for analytics or marketing). You may modify or withdraw your consent at any time through the Cookie Preferences link in the website footer.

#### §7. DATA SHARING AND DISCLOSURE

We do not sell or rent your personal data.

We may share data only with:

Trusted third-party service providers (analytics, hosting)

Legal authorities when required by law

Contractors under strict confidentiality and data protection agreements

#### §8. INTERNATIONAL TRANSFERS

Your data may be transferred to and stored in the Russian Federation.

We ensure that appropriate safeguards are in place, such as:

Where data is transferred outside the EEA or UK, we rely on SCCs and implement additional safeguards such as encryption, access controls, and data minimization techniques.

Supplementary security measures (encryption, restricted access)

Transfers are based on explicit consent where required

You have the right to request a copy of the applied safeguards.

By continuing to use our services, you explicitly consent to the transfer and storage of your personal data in the Russian Federation or other jurisdictions where our servers or service providers are located. You acknowledge that these jurisdictions may have different data protection laws than your country of residence.

# §9. DATA RETENTION

We retain personal data only for as long as: Necessary to fulfill the purposes listed above Required by legal or regulatory obligations Needed for contract execution and compliance We apply anonymization and pseudonymization techniques where appropriate to enhance data

protection and minimize risk in case of unauthorized access.

Data is securely deleted or anonymized once no longer required.

#### §10. DATA SECURITY

We implement technical and organizational measures, including: SSL/HTTPS encryption
Firewall and antivirus protection
Access control and staff training
Regular system updates and audits
Use of anonymization and pseudonymization where applicable

#### §11. CHILDREN'S PRIVACY

We do not knowingly collect personal data from children under the age of 16, or the minimum age under applicable law in your jurisdiction.

# §12. THIRD-PARTY SERVICES

We may link to or use services operated by third parties (e.g., analytics, payment providers). We are not responsible for their privacy practices. Please consult their privacy policies directly.

# §13. CHANGES TO THIS POLICY

This Privacy Policy may be updated. The latest version will always be available on our website.

Significant changes will be communicated directly where required.

We will notify users of any material changes via email or through a notice on our website prior to the change becoming effective. We encourage users to review this Privacy Policy periodically for any updates.

# §14. CONTACT US

If you have any questions about this Privacy Policy or your data rights, please contact:

**Data Controller:** Maxim Chepkasov (HudX Project)

Telegram: https://t.me/stiwin174

**Legal Name:** Maxim Chepkasov (sole proprietor) **Legal Address:** Chelyabinsk, Russian Federation

Email: hudxvisual@gmail.com

# §15. GOVERNING LAW AND JURISDICTION

By using our services, you agree that any dispute arising out of or related to this Privacy Policy shall be governed by the laws of the Russian Federation. Unless otherwise agreed in writing, all disputes shall be subject to the exclusive jurisdiction of the courts located in the Russian Federation.

You acknowledge that the legal protections applicable in the Russian Federation may differ from those in your home country.

Last revised on: January 1, 2025.

This document is subject to updates. The most recent version is always available at <a href="https://hudx.pro/en/downloads/privacy">https://hudx.pro/en/downloads/privacy</a>