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FRANCE EXPORT CONTROL DECLARATION

Encryption Software Export Declaration - English Version

DECLARANT INFORMATION

Legal Entity: Individual entrepreneur Vladimir Yazydzhi

Authorized Representative: Vladimir Yazydzhi

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SOFTWARE INFORMATION

Software Name: Convertik

Software Version: 2.1

Bundle Identifier: com.yazydzhi.Convertik

Platform: iOS (iPhone/iPad)

Developer Account: yazydzhi

Distribution Method: Apple App Store

ENCRYPTION DECLARATION

1. Encryption Classification

Category: Standard encryption algorithms only

Classification: Mass market encryption software

2. Encryption Technologies

Network Communication:

- TLS 1.3 (RFC 8446) for HTTPS communication
- Standard IETF protocols for API communication

Data Storage:

- AES-256 (FIPS 197) for CoreData encryption
- Apple Keychain Services for sensitive data storage

Payment Processing:

- RSA-2048 (PKCS#1) for StoreKit2 transactions
- ECC P-256 (FIPS 186-4) for StoreKit2 key management

Third-party Services:

- Standard TLS for AdMob HTTPS communication

3. Encryption Implementation

- **Source:** Apple's standard encryption frameworks
 - **Customization:** None - uses only Apple-provided implementations
 - **Proprietary Algorithms:** None implemented
 - **Military/Government Use:** Not intended for such use
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FRENCH EXPORT CONTROL COMPLIANCE

1. Applicable Regulations

- **French Law:** Décret n° 2012-901 du 20 juillet 2012
- **EU Regulation:** Règlement (UE) 2021/821
- **Software Category:** Civil-use encryption software

2. Compliance Declaration

- ☒ Software uses only standard encryption algorithms
- ☒ No proprietary or military encryption implemented
- ☒ Compliant with French export control regulations

- ☑ Intended for commercial consumer use only
- ☑ No dual-use or military applications

3. Export Control Classification

- **ECCN:** 5D002 (Mass market encryption software)
 - **License Exception:** ENC (Encryption commodities and software)
 - **Export Authorization:** Not required for mass market software
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TECHNICAL SPECIFICATIONS

1. Encryption Standards

- **TLS 1.3:** RFC 8446 compliant
- **AES-256:** FIPS 197 compliant
- **RSA-2048:** PKCS#1 compliant
- **ECC P-256:** FIPS 186-4 compliant

2. Security Implementation

- **Key Management:** Apple Keychain Services
- **Key Generation:** Apple Security Framework
- **Secure Storage:** Secure Enclave (when available)
- **Data Protection:** iOS Data Protection API

3. Data Categories

- **Encrypted:** User preferences, subscription data, sensitive settings
 - **Non-encrypted:** Public exchange rates, user interface elements
 - **Transmitted:** All data encrypted in transit via TLS 1.3
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CERTIFICATIONS AND COMPLIANCE

1. Standards Compliance

- **FIPS 140-2:** Via Apple Security Framework
- **Common Criteria:** Via Apple Security Framework
- **ISO/IEC 27001:** Via Apple Security Framework

2. Third-party Certifications

- **Apple App Store:** Review process completed
- **Google AdMob:** HTTPS-only communication
- **StoreKit2:** Apple's secure payment framework

3. Privacy Compliance

- **GDPR:** Full compliance with privacy policy
- **Data Processing:** Lawful basis documented
- **User Rights:** Complete implementation of data subject rights

LEGAL DECLARATION

Declaration Statement

I, **Vladimir Yazydzh**i, acting as the authorized representative of the software developer, hereby declare under penalty of perjury that:

1. The information provided in this declaration is accurate and complete
2. The Convertik application uses only standard encryption algorithms
3. No proprietary, military, or restricted encryption is implemented
4. The software complies with French export control regulations
5. The software is intended solely for commercial consumer use

Contact Information

Primary Contact: ivan.uzhas@yandex.com

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Website: <https://convertik.ponravilos.ru>

Support: info@ponravilos.ru

Signature and Date

Date: September 7, 2025

Digital Signature: [To be added]

Name: Vladimir Yazydzhi

Title: Developer

Legal Entity: Individual entrepreneur Vladimir Yazydzhi

REQUIRED DOCUMENTATION

Mandatory Attachments

- ☐ Apple App Store Connect encryption declaration screenshot
- ☐ Technical documentation of encryption implementation
- ☐ Privacy Policy (French and English versions)
- ☐ Terms of Service (French and English versions)
- ☐ Data Processing Policy (French and English versions)
- ☐ Software architecture documentation

Additional Supporting Documents

- ☐ Apple Developer Program membership certificate
 - ☐ Software distribution agreement with Apple
 - ☐ Third-party service agreements (AdMob, etc.)
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SUBMISSION INFORMATION

Submission Date: September 7, 2025

Form Version: 1.0

Prepared By: Convertik Development Team

Language: English

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Note: This declaration is submitted in English for international processing. French translation is available in the corresponding French version of this document.