

## Confidentiality Statement

Sakha Republic/ Yakutia

Approved on: 01.12.2020

### Purpose of this Confidentiality Statement

This Confidentiality Statement (hereinafter referred to as "the Statement") developed in accordance with the Constitution of the Russian Federation, the Civil Code of the Russian Federation, Federal Law #152-FZ of July 27, 2006 "On Personal Data" and regulatory legal acts of the Russian Federation adopted in accordance with them, contractual obligations of the Operator in accordance with consents received from personal data subjects to the processing of their personal data. This Statement is developed and used by **Sole Proprietor Global Psychological Systems FZE**, (hereinafter referred to as "We") with respect to information received from the Operator's Website with domain names: <http://tl.ashahov.ru>, <https://ashahov.ru>, and their subdomains, as well as on social media pages: [https://www.instagram.com/psyc ...](https://www.instagram.com/psyc...), [http://vk.com/psycholog.alexan ...](http://vk.com/psycholog.alexan...), <https://www.facebook.com/psych...> (hereinafter referred to as "Websites").

We respect the privacy of visitors to our website and understand that information about you is part of your privacy and may be a personal secret. With the exception of the cases provided for in the Confidentiality Statement of this Website, we undertake not to sell, transfer for use or provide information that allows to establish your identity to any third party without your consent. This Confidentiality Statement is made to provide information about our rules for collecting, using and disclosing information that you provide while visiting this Website. Please read this Confidentiality Statement before using our Website or providing your personal data.

By using this Website and providing us with your data, you confirm that you understand and agree to the terms of this Confidentiality Statement, give us consent to the processing of your personal data on the terms set out in this Statement.

If you do not agree with any condition of this Statement, please do not provide us with your data and leave the Website.

### Information voluntarily provided by users

We collect two types of information about you: (A) personally identifiable information (hereinafter referred to as "Personal Data") and (B) indirectly identifiable information (hereinafter referred to as "Automatically-Collected Information"). By providing this type of information on the Website, you understand and agree that we have no obligations to you with respect to this information, except for the obligations stated in this document.

## **A. Identification information (Personal data)**

Personal data are any information related directly or indirectly to some or certain individual (personal data subject). Ultimately, this is information that identifies you personally, for example, your full name, passport and bank details, phone number, email address, postal address, link to your social media profile, photos and videos provided by you for the purpose of providing the Services or provided to us in the form of reviews.

We collect and store information that you have provided to us. Now, here are some examples of the ways in which we can collect personal data. We may collect information about your name, phone number, and email address if you:

- fill out the registration form on our Website;
- submit a review on our Website, on our social networks;
- subscribe to our newsletter about our news and promotions;
- fill out the feedback form;
- contact us for advice on how to get any service;

We may collect information about your name, passport and bank details, postal address in case of receiving claims from you, applications for a refund, as well as other official requests.

The above list is an example of exactly how we can obtain your personal data through our Website. From time to time we may collect personal information about you in other ways that are not described above. If you do not want us to receive your personal data for processing, please do not provide them to us. Your personal data will be used for the purposes for which you have provided it to us.

We do not process personal data of minors. If you are under the age of 18, please do not share your personal data with us. Responsibility for actions of minors, including their purchase of the Services on the Website, lies with the legal representatives of such minors. All visitors under the age of 18 are required to obtain the permission of their legal representatives before providing any personal information about themselves. If we become aware that we have received personal data about a minor without the consent of their legal representatives, such information will be deleted as soon as possible.

## **B. Information that can indirectly identify you (automatically collected information)**

"Information that can indirectly identify you (automatically-collected information) does not identify you directly but is personal data. For example, we may conduct research on the demographics of our users, the time spent browsing the pages of the Website, interests of visitors and behavior based on information provided by specialized services to promote the Website or based on surveys. We do this to better understand you and help you, as well as to be able to improve our Website. Automatically collected information includes:

- information about the type of browser used;

- details of the web-pages you have viewed;
- your IP address;
- geolocation data;
- hyperlinks that you clicked through;
- websites that you visited before visiting our website;
- other data collected and processed automatically on websites belonging to the Operator;
- cookies.

Most Internet browsers are configured to accept cookies by default. You can change the settings to block cookies, or set a warning about sending cookies to your device.

We may also collect automatically collected information to provide services according to your preferences, fulfill your requests for information, and improve our services. Automatically collected information may be provided to third parties. For example, we may share information about the number of users of our website and events that are held on the website with third parties.

We do not consider information you provide that is not personally identifiable (such as questions or suggestions) to be confidential. We have the right to disclose such information by any means and use it for any purpose. If you do not want us to collect automatically-collected information, please do not visit our Website or provide us with this information.

### **Use and transfer of submitted personal data**

We may process and transfer your personal data in the following cases:

- To provide services at your request, or to perform operations requested by you;
- We may also use your personal information to send you newsletters, with your consent;
- To third parties – service providers, agents, or independent contractors who help us maintain our website and provide us with other administrative services (including such services and services as processing incoming requests for services, provision of services by payment systems, accounting services, maintenance, legal services, banks, management services, provision of marketing services);
- In accordance with the law, or in the case of a reasonable assumption that such action is necessary in order to comply with the requirements of the law or the requirements of the judicial process, to secure and protect our rights or property, or in extraordinary circumstances to protect the personal safety of our end users;
- Our successor companies in the event of our restructuring, affiliated companies;
- For tracking and analyzing the use of the website without identifying and evaluating statistical information about our visitors and users and providing such information to third parties;

- To detect any physical or other type of threat against you or to protect your property or legal rights.

Except as described in this Statement or when we request separate consent or information, we cannot use, transfer or disclose your personal data to third parties. Moreover, Personal Data may be transferred to actual or potential parties to the proposed transaction, in the event of a decision on reorganization, without obtaining your consent or without additional notice. Under such circumstances, we will ask for written assurances that personal data transferred through this website will be adequately protected.

### **Use and disclosure of automatically-collected information**

Automatically collected information that is not personally identifiable may be used as described above or by other means, in accordance with the current laws.

### **Access, updating, correction and destruction of personal data**

You can contact us to update or adjust the information about you. If you would like to unsubscribe from our newsletters you have previously subscribed to, please contact us by email [mail@ashahov.ru](mailto:mail@ashahov.ru)

You have the right to withdraw your consent to the processing of your personal data. Please email your request to e-mail [mail@ashahov.ru](mailto:mail@ashahov.ru)

We will destroy your personal data we store within 30 days from the date of receipt of the withdrawal of your consent.

We store the data provided by you for a period not exceeding 3 years from the date of your last visit to the Website. After the specified period, we will destroy the data provided by you.

### **Security**

We take reasonable precautions to ensure the protection of personal information collected through this website and used in accordance with this Statement. We have certain physical, electronic, contractual and administrative measures in place to protect the security and confidentiality of your personal information.

In addition to technical guarantees, we also use non-automated tools and procedures to protect your personal data. However, we cannot guarantee complete security from people who may try to evade our security measures and intercept transactions over the Internet.

This Statement applies only to the Websites, and we do not control and are not responsible for any third-party websites to which the user may go. Other personal information may be collected or requested from the user on such resources, as well as other actions that are not related to us may be performed.

We do not verify the accuracy of the personal information provided by users and do not monitor their legal capacity. However, we assume that the user provides reliable and sufficient personal information on the issues proposed in the forms of the Websites, and keep this information up to date.

### **Cross-border data transfer**

Cross-border transfer of personal data is the transfer of personal data to a foreign country to an authority of a foreign country, a foreign individual or a foreign legal entity. We do not transfer personal data across borders.

### **Changes to the Confidentiality Statement**

We may change the Confidentiality Statement on our Website at any time by updating it. You are subject to any such changes and therefore you should visit this page periodically to review the most recent version of the Confidentiality Statement.

### **Questions**

If you have any questions regarding the Confidentiality Statement of this Website or other aspects of personal data processing on our Website, please contact us by email [mail@ashahov.ru](mailto:mail@ashahov.ru)