

PERSONAL DATA PROTECTION AND PROCESSING POLICY,

Revision dated 03.03.2025

1. General provisions

1.1. This PERSONAL DATA PROTECTION AND PROCESSING POLICY (hereinafter referred to as the **Policy**) of the **ALGORITHMIKA LIMITED LIABILITY COMPANY** (PSRN: 5167746505273, TIN: 7704386240, RRC: 770901001, hereinafter referred to as the **Administrator**), published at the permanent web address <https://goit.space/docs/personal-data-processing-policy/> defines the procedure for processing personal data (hereinafter referred to as **Personal Data**) of users (hereinafter referred to as **Users**) when Users use the goit.space/en website, the Algorithmics Web Platform hosted on the Internet at: learn.algoitmika.org, related web pages, services and information systems (hereinafter referred to as the **Website**) and services, namely the functionality and capabilities of the Website (hereinafter referred to as **Services**). The Policy contains appendices and supplements that constitute an integral part of the Policy.

1.2. The Policy was developed in accordance with Federal Law No. 152-FZ dated 27.07.2006 "On Personal Data".

1.3. The User must carefully read this Policy, as the User must provide the Administrator with personal data in order to properly use the Website and its Services.

1.4. If the User does not agree with these terms of personal data processing, he/she should stop using the Website and its Services.

1.5. For the purposes of this Policy, in relation to the use of the Website and its Services, the term "User" means an adult person of full legal capacity, the legal representative of a minor (child), as well as the minor (child) himself/herself.

1.6. The Administrator has the right to unilaterally change the terms of this Policy, and such changes take effect after 3 (three) calendar days as of the date of publication of the new version of the Policy. Before using the Website and its Services, the User undertakes to become familiar with the new version of the Policy each time the User visits the Website. Continued use of the Website and its Services will mean that the User agrees to the terms of the new version of the Policy in full. If the User does not agree with the terms of the new version of the Policy, he/she must stop using the Website and its Services.

1.7. The Administrator uses cookies on the Website. Information and policies regarding cookies are available in the relevant section of the Website: [Terms of Use of Cookies](#). These conditions are an integral part of the Policy.

2. Personal data

2.1. For the proper use of the Website and its Services, the User provides reliable and current personal information about himself/herself and/or a minor (child) whose legal representative the User is, in accordance with clause 3.1. Policies.

2.2. The proper acceptance of the Policy for the User is to check any symbol or mark in the box (checkbox) on the Website with the text:

"I am familiar with the PERSONAL DATA PROTECTION AND PROCESSING POLICY and agree to the transfer, processing and storage of my personal data and the personal data of my minor child (if any)."

2.3. The Administrator respects the Users' right to confidentiality of Personal Data and undertakes to process such data and other information provided by the User or collected about him/her exclusively in accordance with this Policy and the legislation of the Russian Federation.

2.4. The User has the right to withdraw his/her consent to the processing, storage and transfer of his/her personal data at any time by sending an appropriate application to the email address: Dpo@algteam.ru.

3. Data collection

3.1. By accepting this Policy, the User voluntarily gives his/her consent to the processing, storage and transfer to the Administrator of the following personal data (his/her own as a User and/or that of a minor (child), whose legal representative the User is):

- last name, first name, patronymic;

- image (photos, videos);
- email address;
- phone number;
- information about education;
- other information (gender, age, place of birth, information confirming the rights of the legal representative of the minor (child)).

3.2. The processing of Personal Data should be understood as actions (operations) or a set of actions (operations) performed with Personal Data with or without the use of automated tools on the Website, including the collection, recording, systematization, accumulation, storage, revision (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of Personal Data.

3.3. The User expresses his/her consent to the processing, storage, and transfer of his/her Personal Data and depersonalized data obtained through use and transfer through the "Yandex.Metrica" electronic Internet service and other Russian services, in order to:

- properly provide the Website and its information and reference services;
- properly execute agreements related to the use of the Website to which the User is a party;
- provide Users with the opportunity to use the Website and its Services;
- consider claims made by the User to the Administrator;
- take into account the ratings and opinions of Users about the quality of the Services provided by the Website;
- correct detected errors, modify and improve the Website;
- ensure the operation and security of the Website;
- provide necessary technical support to Users;
- ensure the Administrator's interaction with Users, including the provision of responses to all User requests regarding the use of the Website and its Services;
- send notifications and other messages regarding the Website and its Services, including the related events, updates, activities, promotions, and other informational and advertising materials to Users who have agreed to receive them;
- detect, investigate and prevent illegal actions or actions violating the legislation of the Russian Federation and the provisions of the Policy, as well as the intellectual property rights of the Administrator, its affiliates, its partners and other Users.

3.3.1. The list of requested data can be expanded according to the nature of the legal relationship between the Administrator and Users.

3.4. The Administrator has the right to use the User's e-mail address to provide the User with information about the paid and free services of the Administrator and its partners, as well as other information similar to that which the User requests from the Administrator, unless the User refuses to receive the mentioned information in accordance with clause 2.4. Policies.

3.5. The Administrator stores Personal Data of Users for as long as the Administrator has a legitimate reason to process the Personal Data. In case of termination of the Policy, the Administrator has the right to store the specified User data for 3 (three) months.

3.6. Users' Personal Data is stored on remote electronic media. When processing Personal Data in order to fulfill obligations under agreements with the User, the Administrator may extract such Personal Data and store it on tangible media. The storage of the specified Personal Data is carried out during the period established by the legislation of the Russian Federation educational and archival matters.

4. Grounds for processing Personal Data

4.1. The Administrator processes Personal Data on the following grounds:

- the processing of Personal Data is necessary to achieve the goals stipulated by the legislation of the Russian Federation;
- the processing of Personal Data is necessary for the Administrator to properly provide functionality of the Website and its Services and the execution of relevant agreements (offers) to which the User is a party, including for the fulfillment of the terms of the Policy;
- the processing of Personal Data is necessary for the exercise of the rights and legitimate interests of the Administrator;

- the processing of Personal Data is carried out with the User's consent to the processing of his/her Personal Data and the Personal Data of a minor (child) whose legal representative the User is.

5. Additional provisions on the processing of Personal Data

- 5.1. The Administrator does not collect or process information about Users' race, nationality, political opinions, religious and/or philosophical beliefs, or any other information not specified in this Policy.
- 5.2. In order to store Personal Data, the User agrees that the Administrator has the right to depersonalize such data in the ways provided for by the current legislation of the Russian Federation (i.e., to assign a special identifier to the totality of Personal Data provided by the User).
- 5.3. The User has the right to request from the Administrator information about the processing of Personal Data provided by the Administrator.
- 5.4. The User confirms that he/she understands and agrees that the Personal Data provided by the User cannot be deleted from the systems of the Website if there are existing contracts and/or offers with the Administrator or other agreements. If the User requests the deletion of his/her data and if there are contracts and/or offers concluded with the Administrator and other agreements, such agreements are subject to termination. After such termination, the User loses the right to access the Website and its Services in whole or in part.
- 5.5. Software and hardware errors, both on the part of the Administrator and on the part of the User, which led to the User's inability to access the Website and its Services, are recognized by the Administrator and the User as force majeure circumstances and are grounds for releasing the Administrator from responsibility for non-performance of obligations related to the functioning of the Website and its Services.

6. Transfer of Personal Data to other persons

- 6.1. The Administrator does not transfer Personal Data to other persons, except in the following cases:
- the provisions established by the Policy, in particular clause 3.3. of the Policy;
 - the obligation to provide information in accordance with the current legislation of the Russian Federation, the requirements of state or law enforcement authorities, or for the prevention of crimes;
 - the need to provide the User with proper access to the Website and its Services, as well as to the information and features contained therein. Therefore, the User agrees that the Administrator may transfer his/her Personal Data and information about him/her to the Administrator's partners and/or third parties who provide services to the Administrator, including to ensure the availability and operability of the Website, its Services or their contents.

The Administrator's partners under this clause are:

- "Algoresheniya" LLC (TIN: 9709115343, PSRN: 1247700587243);
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- ANO "GORKY TECH" (TIN: 5260470977, PSRN: 1205200017440);
- "GAZINFORMSERVICE" LTD (TIN: 7838017968, PSRN: 1047833006099);
- Public Joint-Stock Company Sberbank of Russia (TIN: 7707083893, PSRN: 1027700132195).

6.2. The Administrator has the right to transfer anonymous information (i.e. information that does not directly or indirectly identify the User) and generalized information (i.e. information about groups and categories of Users, including statistics and actions on the Website, which does not specify the User's identity and cannot be used to identify the User) to the Administrator's advertising partners.

6.3. The Administrator has the right to allow its advertising partners to collect anonymous and aggregated information, which the advertising partners may then transmit to the Administrator. Such Administrator partners may collect information using tracking technologies (such as cookies and web beacons). These technologies enable advertising partners to develop and deliver targeted advertisements, including on third-party websites, and to provide Users with advertisements about products and services that may be of interest to them. Advertising partners may also use this information to monitor, improve or adjust the effectiveness of their own operations.

7. Security

7.1. The Administrator undertakes to take all necessary precautions to prevent the loss, misuse, modification or deletion of Personal Data. The authorized and involved persons of the Administrator may have access to the Personal Data received from the Users, but their use is limited to the scope of their duties related to providing the Users with the opportunity to use the Website and its Services. These persons, who are granted access to Personal Data and information about Users, are required to maintain the confidentiality of such data and information. At the same time, these persons are prohibited from using Personal Data for any purposes other than those listed in the Policy, or in connection with processing User requests.

7.2. In addition to the security measures taken by the Administrator to protect Personal Data, the User agrees to assume the obligation to independently ensure the confidentiality of his/her data and related information, including the use of the possibility to restrict access to information.

7.3. The Administrator is not responsible for and does not control what information the User discloses to other Users or third parties. The User understands and agrees that he/she is responsible for choosing what information to share and under what conditions. If the User has published Personal Data about himself/herself on the Administrator's Website or on the Administrator's Partner Websites/Services, it may be copied by other Users and/or third parties before it is deleted, collected or archived.

8. Third-party sources

8.1. The Website may contain links to other websites and Internet resources. The User agrees that the terms of this Policy apply only to his/her Personal Data and information that the Administrator receives in the course of the current use of the Website and its Services in accordance with the Policy. The Administrator is not responsible for any data that third parties may collect, store and use through their websites and Internet resources or as part of their services. The Administrator recommends that the Users carefully read the Privacy Policy of each visited website and Internet resource.

9. User rights

9.1. The User has the right to exercise the following rights at any time with respect to the data that may be recognized as Personal Data in accordance with the current legislation of the Russian Federation, in particular has the right to:

- Request the Administrator to provide the User with a copy of the User's personal data and/or information available to the Administrator;
- Request the Administrator to update and correct any outdated or incorrect information held by the Administrator about the relevant User.

9.2. To exercise any of the above rights, the User must send a request to the following e-mail address: Dpo@algteam.ru. The Administrator informs that even if the User sends such a request to the Administrator to delete the User's Personal Data from the information systems of the Website and its Services, the Administrator has the right to retain all information necessary to prevent fraud and abuse, to perform analytics, to comply with legal obligations, or in cases where the Administrator has reason to believe that it has a legitimate reason to take appropriate action.

10. Final provisions

10.1. The Policy and all legal relations arising from it are regulated by the current legislation of the Russian Federation. All disputes that arise are resolved in accordance with the legislation of the Russian Federation.

10.2. The court's finding that any provision of the Policy is invalid or unenforceable shall not invalidate any other provision of the Policy.

10.3. The inaction on the part of the Administrator in case of violation of the Policy provisions by any of the Users does not deprive the Administrator of the right to take appropriate actions later in defense of its interests and protection of intellectual rights to the information materials of the Website and electronic content protected in accordance with the legislation.

10.4. By accepting this Policy, the User confirms that he/she has read and fully agrees with all the terms and conditions of the Policy, its supplements and appendices, and accepts all the rights and obligations established by this Policy.