

# **Policy on Personal Data Processing and Site usage**

## **1. General Provisions**

This policy on personal data processing has been developed in accordance with the requirements of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data" (hereinafter referred to as the "Personal Data Law") and determines the procedure for processing personal data and measures to ensure the security of personal data taken by Text to Them (hereinafter referred to as the "Operator"). The Russian version is available at <https://texttothem.com/cookies.pdf>.

1.1. The Operator sets compliance with human and civil rights and freedoms, including the protection of the right to privacy, personal and family secrets, as its most important goal and condition for carrying out its activities involving the processing of personal data.

1.2. This Policy of the Operator on Personal Data Processing (hereinafter referred to as the "Policy") applies to all information that the Operator may obtain about visitors to the website <https://texttothem.com/>.

## **2. Basic Terms Used in the Policy**

2.1. Automated processing of personal data - processing of personal data using computer technology.

2.2. Blocking of personal data - temporary suspension of the processing of personal data (except for cases where processing is necessary to clarify personal data).

2.3. Website - a set of graphic and informational materials, as well as computer programs and databases that provide their accessibility on the Internet at the network address <https://texttothem.com/>.

2.4. Personal data information system - a set of personal data contained in databases and providing information technology and technical means for their processing.

2.5. Depersonalization of personal data - actions as a result of which it is impossible to determine the belonging of personal data to a specific User or other subject of personal data without using additional information.

2.6. Processing of personal data - any action (operation) or a set of actions (operations) performed with personal data using automation tools or without such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.7. Operator - a state body, municipal body, legal or natural person who, either alone or jointly with other persons, organizes and/or carries out the processing of personal data and determines the purposes of processing personal data, the composition of personal data subject to processing, actions (operations) performed with personal data.

2.8. Personal data - any information directly or indirectly related to a specific or identifiable User of the website <https://texttothem.com/>.

2.9. Personal data allowed for distribution - personal data, access to which is provided by the personal data subject to an unlimited number of persons by giving consent to the processing of personal data allowed for distribution in the manner provided by the Personal Data Law (hereinafter referred to as personal data allowed for distribution).

2.10. User - any visitor of the website <https://texttothem.com/>.

2.11. Provision of personal data - actions aimed at disclosing personal data to a specific person or a certain circle of persons.

2.12. Distribution of personal data - any actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or acquainting an unlimited circle of persons with personal data, including disclosure of personal data in the media, placement in information and telecommunications networks or providing access to personal data in any other way.

2.13. Cross-border transfer of personal data - transfer of personal data to the territory of a foreign state to a foreign state authority, foreign individual or foreign legal entity.

2.14. Destruction of personal data - any actions as a result of which personal data are irrevocably destroyed with the impossibility of further restoring the content of personal data in the personal data information system and/or material media of personal data.

### **3. Basic Rights and Obligations of the Operator**

3.1. The Operator has the right to:

- obtain from the subject of personal data reliable information about his/her personal data;
- receive information about the processing of personal data, including its contents and purpose, the methods of processing used, the persons to whom personal data may be disclosed, and the rights of the subject of personal data;
- demand that personal data be clarified, blocked or destroyed if they are incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;
- take legal measures to protect their rights and legitimate interests, including compensation for damages and compensation for moral harm.

3.2. The Operator is obliged to:

- process personal data in accordance with the Personal Data Law and this Policy;
- ensure the security of personal data during their processing, including protection against unauthorized access to personal data;
- specify the purpose of processing personal data when collecting them, unless the personal data subject has already been notified of such purpose;
- provide the subject of personal data with information about the processing of his/her personal data upon request, or his/her legal representative or authorized body;
- notify the subject of personal data in case of unauthorized access to personal data;
- suspend the processing of personal data in case of detection of inaccurate personal data or illegal actions related to their processing until such data is clarified or the legality of actions is confirmed;
- destroy personal data upon achieving the processing goal or in case of loss of the need to achieve this goal, unless otherwise provided by law;
- keep records of personal data processing activities.

## **4. Conditions for Processing Personal Data**

4.1. The Operator processes personal data only with the consent of the personal data subject to the processing of his/her personal data, unless otherwise provided by law.

4.2. The Operator processes personal data in order to fulfill the obligations imposed by law.

4.3. The Operator processes personal data to fulfill its contractual obligations.

4.4. The Operator processes personal data to protect the life, health or other vital interests of the personal data subject or others when it is impossible to obtain the consent of the personal data subject.

4.5. The Operator processes personal data for statistical or other research purposes, subject to mandatory depersonalization of such personal data.

## **5. Principles of Personal Data Processing**

5.1. Personal data processing is carried out on a legal and fair basis.

5.2. Personal data processing is limited to achieving specific, pre-defined, and legal purposes. Processing of personal data that is incompatible with the purposes of personal data collection is not allowed.

5.3. The merging of databases containing personal data that are processed for incompatible purposes is not allowed.

5.4. Only personal data that corresponds to the purposes of its processing is subject to processing.

5.5. The content and scope of processed personal data correspond to the declared purposes of the processing. Excessiveness of processed personal data in relation to the declared purposes of their processing is not allowed.

5.6. When processing personal data, the accuracy, sufficiency, and, in necessary cases, relevance of personal data to the purposes of personal data processing are ensured. The Operator takes necessary measures and/or ensures their adoption to delete or clarify incomplete or inaccurate data.

5.7. Storage of personal data is carried out in a form that allows identifying the subject of personal data no longer than necessary to achieve the purposes of personal data processing, unless the storage period for personal data is established by federal law, a contract, the other party to which is the subject of personal data as the beneficiary or guarantor. Processed personal data is destroyed or depersonalized upon reaching the purposes of processing or in case of the loss of the need to achieve these goals, unless otherwise provided by federal law.

## **6. Purposes of Personal Data Processing**

<b>Purpose of Processing</b>	<b>Improving the service's performance</b>
Personal Data	<ul style="list-style-type: none"><li>• Behavioral patterns on the website</li></ul>
Legal Basis	<ul style="list-style-type: none"><li>• Federal Law "On Information, Information Technologies and Information Protection" dated 27.07.2006 N 149-Φ3</li></ul>
Types of Personal Data Processing	<ul style="list-style-type: none"><li>• Collection, recording, systematization, accumulation, storage, destruction, and depersonalization of personal data</li></ul>

## **7. Conditions of Personal Data Processing**

7.1. Personal data processing is carried out with the consent of the subject of personal data to the processing of their personal data.

7.2. Personal data processing is necessary to achieve the purposes provided for by an international treaty of the Russian Federation or by law, to perform functions, powers, and duties imposed on the Operator by the legislation of the Russian Federation.

7.3. Personal data processing is necessary to administer justice, enforce a judicial act, an act of another body or official, which must be enforced in accordance with the legislation of the Russian Federation on enforcement proceedings.

7.4. Personal data processing is necessary to perform a contract, the other party to which is the subject of personal data as the beneficiary or guarantor, as well as to conclude a contract at the initiative of the subject of personal data or a contract under which the subject of personal data will be the beneficiary or guarantor.

7.5. Personal data processing is necessary to exercise the rights and legitimate interests of the Operator or third parties or to achieve socially significant goals, provided that this does not violate the rights and freedoms of the subject of personal data.

7.6. Personal data processing is carried out for personal data that are publicly available to an unlimited circle of persons, to whom the subject of personal data has provided access, or at their request (hereinafter - publicly available personal data).

7.7. Personal data processing is carried out for personal data that must be published or disclosed in accordance with federal law.

## **8. Procedure for Personal Data Collection, Storage, Transfer, and Other Types of Processing**

The security of personal data processed by the Operator is ensured by implementing legal, organizational, and technical measures necessary to fully comply with the requirements of the current legislation in the field of personal data protection.

8.1. The Operator ensures the security of personal data and takes all possible measures to prevent unauthorized access to personal data.

8.2. User's personal data will never be transferred to third parties under any circumstances, except as required by applicable law or if the subject of personal data has given consent to the Operator to transfer data to a third party to fulfill obligations.

8.3. In case of inaccuracies in personal data, the User can update them independently by sending a notification to the Operator at the email address [helpme@texttothem.com](mailto:helpme@texttothem.com) marked "Update of personal data."

8.4. The processing period of personal data is determined by the achievement of the goals for which the personal data was collected, unless another period is provided for by the contract or the current legislation.

The User may revoke their consent for the processing of personal data at any time by sending a notification to the Operator via email at the email address [helpme@texttothem.com](mailto:helpme@texttothem.com) marked "Revocation of consent for the processing of personal data."

8.5. All information collected by third-party services, including payment systems, communication tools, and other service providers, is stored and processed by those persons (Operators) in accordance with their User Agreement and Privacy Policy. The subject of personal data and/or these documents determine the conditions of processing personal data. The Operator is not

responsible for the actions of third parties, including the service providers mentioned in this clause.

8.6. Prohibitions on the transfer (except for access provision), as well as the processing or conditions of processing (except for access provision) of personal data authorized for distribution, do not apply in cases of personal data processing in the state, public, and other public interests defined by Russian legislation.

8.7. The Operator ensures the confidentiality of personal data during processing.

8.8. The Operator stores personal data in a form that allows to identify the subject of personal data no longer than required for the purposes of processing personal data, unless the storage period of personal data is established by federal law, a contract, a party to which, a beneficiary or a guarantor of which is the subject of personal data.

8.9. The termination of the processing of personal data may be due to the achievement of the goals of processing personal data, the expiration of the period of consent of the subject of personal data, the revocation of the consent of the subject of personal data, or the demand to terminate the processing of personal data, as well as the detection of illegal processing of personal data.

## **9. The list of actions performed by the Operator with obtained personal data**

9.1. The Operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distributes, provides, grants access), impersonalizes, blocks, deletes, and destroys personal data.

9.2. The Operator carries out automated processing of personal data by receiving and/or transmitting the received information over information and telecommunication networks or without them.

## **10. Cross-border transfer of personal data**

10.1. Before starting the activity of cross-border transfer of personal data, the Operator must notify the authorized body for the protection of the rights of personal data subjects of their intention to carry out cross-border transfer of personal data (such notification is sent separately from the notification of intention to process personal data).

10.2. Before submitting the above notification, the Operator is obliged to obtain from the authorities of the foreign state, foreign individuals, and foreign legal entities to whom the cross-border transfer of personal data is planned, the relevant information.

## **11. Confidentiality of personal data**

The Operator and other persons who have access to personal data are obliged not to disclose personal data to third parties and not to distribute personal data without the consent of the subject of personal data, unless otherwise provided by federal law.

## **12. Dispute resolution procedure**

12.1. In case of disputes or disagreements related to this Policy for the processing of personal data, the Operator and the subject of personal data will make every effort to resolve them through negotiations between the parties.

12.2. If disputes and disagreements cannot be resolved through negotiations between the parties, then disputes are resolved in accordance with the current legislation of the Russian Federation.

12.3. In case of discrepancies between the Russian and other versions of this Policy, the text of the Russian version is considered prevailing.

## **13. Payment**

13.1. Users have the opportunity to donate money to support the service.

13.2. When making a donation, the user voluntarily and gratuitously transfers money to the Operator.

13.3. The Operator does not provide the user with any material or other benefits in exchange for donations.

13.4. The Operator is not responsible for any unlawful actions by users related to donations.

## **14. Final provisions**

14.1. The user can obtain any explanations on issues related to the processing of his personal data by contacting the Operator via email at [helpme@texttothem.com](mailto:helpme@texttothem.com).

14.2. Any changes to the Operator's policy for processing personal data will be reflected in this document. The policy is valid indefinitely until it is replaced by a new version.

14.3. The current version of the Policy is freely available on the Internet at <https://texttothem.com/cookies.pdf>.