

Privacy Policy

1. General Provisions

Individual Entrepreneur Alexandr Andreevich Shinkarev (hereinafter referred to as the “**Operator**”, the “**Company**”, “**We**”) processes and protects the personal data of users (hereinafter referred to as the “**User**”, the “**Personal Data Subject**”, “**You**”) of the website <https://www.tourmalinecore.com> (hereinafter referred to as the “Website”) and its services.

This Privacy Policy is intended to inform Users about the procedure for processing and protecting personal data when using the Website (<https://www.tourmalinecore.com>).

Relations related to the processing of personal data are governed by Federal Law of the Russian Federation [No. 152-FZ “On Personal Data”](#) dated July 27, 2006.

2. Definitions

“Website” shall mean the website <https://www.tourmalinecore.com> and its subdomains.

“Personal Data” shall mean any information relating directly or indirectly to an identified or identifiable natural person (the Personal Data Subject).

“Processing of Personal Data” shall mean any action or set of actions performed on personal data, including collection, recording, systematization, accumulation, storage, clarification, updating and modification, retrieval, use, transfer, provision, access, blocking, deletion, and destruction — both with and without the use of automated data processing tools.

“User” shall mean any visitor to the Website.

“Personal Data Operator (Operator)” shall mean a state authority, municipal authority, legal entity, or individual who independently or jointly with others organizes and/or carries out the processing of personal data, as well as determines the purposes of processing personal data, the scope of personal data to be processed, and the actions (operations) performed on personal data.



The Company is the Operator with respect to personal data that we may receive in connection with your use of the website <https://www.tourmalinecore.com>.

“Cookies” shall mean small text files stored on the User’s device and used to ensure proper operation of the Website, analytics, and improvement of user experience (see [Section 8](#) for details).

3. Provision of Personal Data

We receive your personal data when:

- visiting the Website, you provide consent to the use of cookies (including analytical cookies);
- you submit a request to discuss potential projects using the functionality of the Website.

We process only general categories of personal data. We do not process biometric personal data or special categories of personal data. We do not intentionally process data of persons under the age of 18. If such processing is identified, the data will be deleted.

If you have a reason to believe that special categories of personal data have been provided to us through the Website, please inform us by emailing contact@tourmalinecore.com.

You have the right to request access to your data, to correct or delete it, and to object to its processing. To exercise these rights, please contact us at: contact@tourmalinecore.com.

4. Purposes of Personal Data Processing

Purposes of Processing	Data that may be processed:
Ensuring stable operation and security, improving user experience, quality of services and marketing activities,	Cookie files: date and time of visit, country and region, device type, system language, operating system, click map, links clicks, refusals of consent to



developing new services, and improving Website functionality	processing, webvisor (mouse movements, clicks, scrolling, form filling)
Discussion of potential projects	Last name, first name, patronymic, phone number, email address, username on a social media account
Obtaining data for subsequent communication with an applicant	

When a User contacts us, we process the data specified in the request.

5. Data Processing Period

Processing of your personal data is terminated in the following cases:

- achievement of the purposes of processing or loss of the need to achieve them;
- withdrawal of consent (if there are no other legal grounds for processing provided by law);
- identification of unlawful processing, if it is impossible to ensure its legality;
- liquidation of the Company.

After the expiration of the specified periods, personal data shall be deleted or anonymized.

6. Legal Basis for Processing

The legal basis for processing your personal data is your consent to the processing of personal data.

User consent includes:

- clicking the “Accept” button in the cookie collection notification banner;
- filling out a form on the Website and subsequently confirming that you have legal capacity, act freely, agree with the Website’s Privacy Policy and consent to the processing of your personal data, followed by clicking the “Send” button.

Processing of your personal data is carried out on the Website for the purposes specified in [Section 4](#) of this document.



Withdrawal of consent to the processing of personal data is carried out by sending a notification to: contact@tourmalinecore.com and takes effect from the next business day.

7. Transfer of Data to Third Parties

We have the right to transfer your personal data to third parties that assist in providing services to you, act as service providers, or otherwise participate in providing certain services to you, as well as to government authorities, if there is a lawful requirement.

8. Cookies and Automatic Logging

Cookies are one of the technologies we use for automatic data collection and improving content quality. Cookies are small text files stored on your device (computer, tablet, smartphone, etc.) and contain information about your online activity.

Our Website uses the Yandex Metrica web analytics service (Yandex LLC). You may separately review the Yandex Metrica Privacy Policy via [the relevant link](#).

We use this service to ensure stable operation and security of the Website, improve user experience, quality of services and marketing activities, develop new services, and improve Website functionality.

When visiting the Website, the internet browser of each visitor transfers the following information: date and time of visit, country and region, device type, system language, operating system type, clicks map, link clicks, refusals, webvisor data.

According to Yandex Metrica's policy, this data is stored in connection logs for 2 years from the date of the last upload for the purpose of collecting statistical information and is then destroyed. Yandex will process this information to evaluate your use of the Website, compile reports on Website activity for us, and provide other services. Yandex processes this information in accordance with the terms of use of its services.



9. Data Security

The Operator takes necessary legal, organizational, and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, and other unlawful actions. These measures include identifying threats to data security, controlling access to personal data, using certified information security tools, and regularly checking the effectiveness of protection measures.

In the event of a data breach, the Operator undertakes to notify you, if possible, and to take all necessary actions to protect the data.

10. Policy Changes

We reserve the right to make changes to this Privacy Policy at any time. We ask you to regularly review updates to this Policy.

11. Contacts

For questions related to personal data, you may contact us at: contact@tourmalinecore.com.

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