

PRIVACY POLICY (PERSONAL DATA PROCESSING POLICY)

LLC “CTT Etalon”

Last updated: 24th of February 2026

1. GENERAL PROVISIONS

1.1. This Privacy Policy (the “Policy”) defines the principles, purposes, and procedure for processing and protecting personal data by Limited Liability Company “CTT Etalon” (the “Operator”) in connection with use of the EverLegends digital platform (website www.everlegends.com and mobile applications) (the “Platform”).

1.2. The Policy is developed in accordance with Federal Law No. 152-FZ “On Personal Data” and other regulatory legal acts of the Russian Federation.

1.3. The Policy applies to personal data processed by the Operator:

- using automation tools and without using such tools;
- directly by the Operator and/or by persons processing personal data on behalf of the Operator under contract (processors).

1.4. The Policy is publicly available on the Platform website and accessible to an unlimited number of persons.

2. OPERATOR DETAILS AND ROSKOMNADZOR NOTIFICATION

2.1. Operator: **LLC “CTT Etalon” (ООО «ЦТТ «Эталон»»).**

2.2. The Operator has notified the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor) of its intention to process personal data.

Notification No.: **2561950**

Registry key: **15560784**

3. DEFINITIONS

For purposes of this Policy, the following definitions apply in accordance with Russian legislation: personal data, processing of personal data, operator, personal data information system, depersonalization, blocking, deletion, and destruction.

Additionally:

- 3.1. **Platform** — EverLegends information and technological system providing services for analysis, verification, and comparative evaluation of user-submitted performance data.
 - 3.2. **User** — an individual using the Platform.
 - 3.3. **Performance Materials** — video or image materials submitted by Users for analytical evaluation.
 - 3.4. **Processor** — a person processing personal data on behalf of the Operator under contract.
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4. CATEGORIES OF PERSONAL DATA SUBJECTS

The Operator processes personal data of:

- 4.1. Platform Users.
 - 4.2. Website visitors.
 - 4.3. Persons contacting the Operator through communication channels.
 - 4.4. Persons submitting Performance Materials for analytical evaluation.
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5. CATEGORIES OF PERSONAL DATA PROCESSED

The Operator may process the following categories of personal data depending on Platform functionality.

A) Identification and profile data

- full name (if provided);
- date of birth (if provided);
- gender (if provided);
- username or profile name.

B) Contact data

- email address;
- telephone number (if provided).

C) Account and authorization data

- account identifiers;
- authentication and session data.

D) Platform activity data

- submitted Performance Materials;
- analytical evaluation results;
- ranking indicators;

- user interaction logs.

E) Technical data

- IP address;
- device identifiers;
- browser type and language;
- operating system information;
- access time and request history.

5.2. The Operator does not process special categories of personal data unless required by law.

6. PURPOSES OF PERSONAL DATA PROCESSING

Personal data is processed for the following purposes:

- 6.1. User registration and authentication.
 - 6.2. Provision of Platform services under the User Agreement, including evaluation and verification of submitted materials.
 - 6.3. Formation and publication of informational rankings.
 - 6.4. Ensuring Platform security and fraud prevention.
 - 6.5. Communication with Users and technical support.
 - 6.6. Improvement and development of Platform functionality.
 - 6.7. Compliance with legal obligations.
 - 6.8. Statistical and analytical research in depersonalized form.
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7. PRINCIPLES OF PERSONAL DATA PROCESSING

Processing is carried out on the basis of:

- legality and fairness;
 - limitation to defined purposes;
 - data minimization;
 - accuracy and relevance;
 - storage limitation;
 - confidentiality and security.
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8. LEGAL GROUNDS FOR PROCESSING

Processing is performed on the basis of:

- 8.1. Consent of the personal data subject.
- 8.2. Conclusion and performance of the User Agreement.

8.3. Requirements of Russian legislation.

8.4. Legitimate interests of the Operator related to Platform security and operation.

9. CONDITIONS OF PROCESSING AND CONSENT

Consent is considered granted when the User:

- registers an account and accepts Platform documents;
- continues using Platform services;
- submits materials for analytical evaluation.

Where processing is based on contractual or legal obligations, separate consent may not be required.

Where minors participate, consent of legal representatives may be required.

10. AUTOMATED PROCESSING AND AI EVALUATION

The Platform may use automated technologies including algorithmic and artificial intelligence systems to:

- analyze submitted materials;
- generate analytical indicators;
- form rankings;
- detect violations or fraud.

Results represent informational analytical conclusions used for Platform operation.

11. PROCESSING METHODS

Processing may include:

collection, recording, systematization, storage, updating, extraction, use, transfer, depersonalization, blocking, deletion, and destruction of personal data.

Processing may be performed using automated and non-automated means.

12. PROCESSORS AND THIRD PARTIES

The Operator may engage processors under contractual obligations ensuring confidentiality and security.

Infrastructure providers hosting Platform systems are not considered processors where they do not access personal data.

Processors act only according to Operator instructions.

13. DATA LOCALIZATION AND CROSS-BORDER TRANSFER

Personal data of citizens of the Russian Federation is recorded and stored using databases located within the territory of the Russian Federation.

The Operator does not intentionally perform cross-border transfer of personal data except where required by law.

Users accessing the Platform from outside the Russian Federation acknowledge application of Russian law.

14. COOKIES AND ANALYTICS

The Platform uses cookies and similar technologies to ensure functionality, security, and analytics.

Detailed information is provided in the Cookie Policy published on the Platform website.

15. RETENTION PERIODS

Personal data is stored only for the period necessary to achieve processing purposes or as required by law.

Typical retention includes:

- account data — during account existence;
- technical logs — for security and diagnostics;
- submitted materials — for verification and Platform functionality.

After expiration, data is deleted or depersonalized.

16. CONFIDENTIALITY

The Operator ensures confidentiality of personal data and does not disclose it without legal grounds.

17. SECURITY MEASURES

Personal data protection includes legal, organizational, and technical measures such as:

- internal regulatory documentation;
 - access control procedures;
 - employee authorization;
 - staff training;
 - threat assessment;
 - physical security controls;
 - antivirus protection;
 - logging and monitoring;
 - backup and recovery systems.
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18. RESPONSIBLE PERSON FOR PERSONAL DATA PROCESSING

Responsible person appointed by the Operator:

Gertner Dmitryi Anatolyevich

Phone: +7 929 287 14 60

Email: elandis@yandex.ru

Address: 167000, Komi Republic, Syktyvkar, Svobody St., 46

19. RIGHTS OF PERSONAL DATA SUBJECTS

Users have the right to:

- obtain information about processing;
- request correction or deletion;
- withdraw consent;
- appeal unlawful actions.

Requests may be submitted to:

ceo@theverdico.com

or by written request to the Operator's address.

If language versions differ, the Russian version may prevail.

20. WITHDRAWAL OF CONSENT

Consent may be withdrawn by contacting the Operator.

Withdrawal may limit or terminate access to Platform services where processing is necessary for operation.

21. POLICY UPDATES

The Operator may update this Policy due to legislative or technological changes.

Updates become effective upon publication on the Platform website.

22. CONTACTS

LLC “CTT Etalon”

Email: ceo@theverdico.com

Website: www.everlegends.com

Address: 125284, Moscow, Leningradsky avenue 29, corpus 1-434