

# **Privacy Policy**

## **Personal Data Processing Policy**

### **1. General Provisions**

This personal data processing policy is developed in accordance with the requirements of the Federal Law of July 27, 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 implemented by Individual Entrepreneur Semenova Sofiya Alekseevna (hereinafter referred to as the "Operator").

1.1. The Operator's main goal and a condition for its activities is the observance of human and citizen rights and freedoms in the processing of personal data, including the protection of the rights to privacy, personal and family secrets.

1.2. This Operator's personal data processing policy (hereinafter referred to as the "Policy") applies to all information that the Operator may obtain about visitors to the website <https://snegikom.ru> and services hosted on the domains snegikom.ru and studio.snegikom.ru, including browser automation and video automation services.

1.3. The Policy covers all personal data that the Operator collects, uses, stores, and transfers within the framework of providing access to services, processing payments, supporting users, and performing other platform functions. Personal data is processed only for the purposes specified in this Policy and is not used for other purposes without the consent of the data subject.

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

2.1. Automated personal data processing — processing personal data using computer equipment.

2.2. Blocking of personal data — temporary cessation of personal data processing (except cases where processing is necessary to clarify personal data).

2.3. Website — a set of graphical and informational materials, as well as computer programs and databases that provide their availability on the Internet at the network address <https://snegikom.ru> and services on the domain studio.snegikom.ru.

2.4. Personal data information system — a set of personal data contained in databases and the information technologies and technical means that ensure their processing.

2.5. Anonymization of personal data — actions as a result of which it is impossible to determine, without using additional information, the belonging of personal data to a specific User or another data subject.

2.6. Processing of personal data — any action (operation) or set of actions (operations) performed using automated or non-automated means with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction of personal data.

2.7. Operator — a government or municipal body, legal or physical entity, independently or jointly with others organizing and/or carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data subject to processing, and the actions (operations) performed with personal data.

2.8. Personal data — any information relating directly or indirectly to a specific or identifiable User of the website <https://snegikom.ru> and services on the domain studio.snegikom.ru.

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

2.10. User — any visitor to the website <https://snegikom.ru> and services on the domain studio.snegikom.ru.

2.11. Provision of personal data — actions aimed at disclosing personal data to a specific person or a specific group of persons.

2.12. Distribution of personal data — any actions aimed at disclosing personal data to an indefinite group of persons (transfer of personal data) or acquainting an unlimited group of persons with personal data, including publishing personal data in mass media, placing in information and telecommunications networks, or providing access to personal data by any other means.

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

2.14. Destruction of personal data — any actions as a result of which personal data is irreversibly destroyed with the impossibility of further recovery of the content of personal data in the personal data information system and/or physical carriers of personal data are destroyed.

### 3. Main Rights and Obligations of the Operator

#### 3.1. The Operator has the right to:

- obtain accurate information and/or documents containing personal data from the data subject;
- continue processing personal data without the data subject's consent in case of withdrawal of consent or a request to cease processing, if grounds are provided by the Personal Data Law;
- independently determine the composition and list of measures necessary and sufficient to ensure compliance with obligations established by the Personal Data Law and relevant regulatory acts, unless otherwise provided by the Personal Data Law or other federal laws.

#### 3.2. The Operator is obliged to:

- provide the data subject, upon request, with information regarding the processing of their personal data;
- organize the processing of personal data in accordance with current Russian legislation;
- respond to requests and inquiries from data subjects and their legal representatives as required by the Personal Data Law;
- provide the authorized body for the protection of data subjects' rights with necessary information within 10 days from the date of receiving such a request;
- publish or otherwise ensure unrestricted access to this Policy on personal data processing;
- take legal, organizational, and technical measures to protect personal data from unlawful or accidental access, destruction, alteration, blocking, copying, provision, distribution, and other unlawful actions regarding personal data;
- cease the transfer (distribution, provision, access) of personal data, cease processing, and destroy personal data as provided by the Personal Data Law;
- fulfill other obligations set forth by the Personal Data Law.

### 4. Main Rights and Obligations of Personal Data Subjects

#### 4.1. Data subjects have the right to:

- obtain information regarding the processing of their personal data, except in cases provided by federal laws. Information is provided by the Operator in an accessible form, and it must not contain personal data relating to other data subjects, except where there are legal grounds for disclosure. The list of information and the procedure for its receipt are established by the Personal Data Law;
- request the Operator to clarify, block, or delete their personal data if the data is incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the stated processing purpose, and take measures provided by law to protect their rights;

- require prior consent for processing personal data for marketing purposes;
- withdraw consent for personal data processing and submit a request to cease processing;
- challenge unlawful actions or inaction by the Operator regarding personal data processing with the authorized body or in court;
- exercise other rights provided by Russian legislation.

#### 4.2. Data subjects are obliged to:

- provide the Operator with accurate information about themselves;
- inform the Operator of any clarifications (updates, changes) to their personal data.

4.3. Persons who provide the Operator with inaccurate information about themselves or information about another data subject without the latter's consent shall bear responsibility in accordance with Russian legislation.

### 5. Principles of Personal Data Processing

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

5.2. Personal data processing is limited to achieving specific, predetermined, and lawful purposes. Processing of personal data incompatible with the purposes of collection is not allowed.

5.3. Merging databases containing personal data processed for incompatible purposes is not allowed.

5.4. Only personal data that meet the purposes of processing are subject to processing.

5.5. The content and volume of processed personal data correspond to the stated purposes of processing. Excessive processing of personal data relative to the stated purposes is not allowed.

5.6. Accuracy, sufficiency, and, where necessary, up-to-dateness of personal data are ensured during processing. The Operator takes necessary measures and/or ensures their implementation to remove or clarify incomplete or inaccurate data.

5.7. Personal data are stored in a form allowing identification of the data subject, no longer than required for the purposes of processing, unless otherwise provided by federal law, contract, or if the data subject is a party, beneficiary, or guarantor. Processed personal data are destroyed or anonymized upon achieving processing purposes or if there is no longer a need to achieve these purposes, unless otherwise provided by federal law.

### 6. Purposes of Personal Data Processing

The purpose of processing is to provide the User with access to services, information, and/or materials available on the websites [snegikom.ru](http://snegikom.ru) and [studio.snegikom.ru](http://studio.snegikom.ru), including:

- browser automation (chats, scheduler, templates, skills, analytics, task history, reports, API access);
- video automation (projects, template gallery, API keys, teams, spaces, reports, history);
- payment processing via YooKassa, Robokassa, and cryptocurrency systems;
- working with teams, spaces, roles, and the referral system;
- working with users' API keys and their encrypted storage on the server;
- working with the browser extension (extension data is not stored on the platform's servers).

Personal data collected for these purposes: email address, name, phone number (optional), payment history, profile data, API keys, team data, task history, video and project data.

Legal basis: Federal Law "On Information, Information Technologies, and Protection of Information" dated July 27, 2006 No. 149-FZ, as well as the terms of the user agreement and the contract for services.

Types of personal data processing: collection, recording, systematization, accumulation, storage, clarification, use, transfer, anonymization, blocking, deletion, and destruction.

## 7. Conditions of Personal Data Processing

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

7.2. Personal data processing is necessary to achieve purposes provided by international agreements of the Russian Federation or by law, and to fulfill functions, powers, and obligations imposed on the Operator by Russian legislation.

7.3. Personal data processing is necessary for the administration of justice, enforcement of a court decision, or enforcement of an act of another authority or official, as required by Russian law on enforcement proceedings.

7.4. Personal data processing is necessary for the performance of a contract, to which the data subject is a party, beneficiary, or guarantor, as well as for concluding a contract initiated by the data subject or a contract under which the data subject is a beneficiary or guarantor.

7.5. Personal data processing is necessary for the exercise of rights and legitimate interests of the Operator or third parties, or for the achievement of socially significant purposes, provided that the rights and freedoms of the data subject are not violated.

7.6. Processing of personal data is carried out for which access by an unlimited number of persons is provided by the data subject or at their request (hereinafter referred to as publicly available personal data).

7.7. Processing of personal data is carried out for which publication or mandatory disclosure is required by federal law.

## 8. Procedure for Collection, Storage, Transfer, and Other Types of Personal Data 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 current legislation on personal data protection.

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

8.2. Personal data of the User will never be transferred to third parties under any circumstances, except in cases related to compliance with current legislation or if the data subject gives consent to the Operator to transfer data to a third party to fulfill obligations under a civil law contract.

8.3. If inaccuracies in personal data are detected, the User may update them independently by sending a notification to the Operator at [support@snegikom.ru](mailto:support@snegikom.ru) with the subject "Updating Personal Data".

8.4. The term for personal data processing is determined by the achievement of the purposes for which the personal data were collected, unless otherwise provided by the contract or current legislation. The User may revoke their consent to personal data processing at any time by sending a notification to the Operator via email at [support@snegikom.ru](mailto:support@snegikom.ru) with the subject "Withdrawal of Consent for Personal Data Processing".

8.5. All information collected by third-party services, including payment systems, communication tools, and other service providers, is stored and processed by these parties (Operators) in accordance with their user agreement and privacy policy. The data subject is required to familiarize themselves with these documents. The Operator is not responsible for the actions of third parties, including those specified in this clause.

8.6. Restrictions established by the data subject on the transfer (except for providing access), processing, or conditions of processing (except for obtaining access) of personal data permitted for distribution do not apply in cases of personal data processing in the public interest as defined by Russian law.

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

8.8. The Operator stores personal data in a form allowing identification of the data subject, no longer than required for the purposes of processing, unless otherwise provided by federal law, contract, or if the data subject is a party, beneficiary, or guarantor.

8.9. Processing of personal data may be terminated upon achievement of the purposes of processing, expiration of the consent of the data subject, withdrawal of consent, or a request to cease processing, as well as upon discovery of unlawful processing.

## 9. List of Actions Performed by the Operator with Personal Data

9.1. The Operator performs collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction of personal data.

9.2. The Operator performs automated personal data processing, including receiving and/or transmitting received information via information and telecommunications networks or without such networks.

## 10. Cross-Border Transfer of Personal Data

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

10.2. Before submitting the above notification, the Operator must obtain the appropriate information from foreign state authorities, foreign individuals, or foreign legal entities to whom the cross-border transfer is planned.

## 11. Confidentiality of Personal Data

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

## 12. Final Provisions

12.1. The User may obtain any clarifications regarding questions related to personal data processing by contacting the Operator via email at [support@snegikom.ru](mailto:support@snegikom.ru).

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

12.3. The current version of the Policy is freely available on the Internet at <https://snegikom.ru/privacy>.