



## **PRIVACY POLICY PARADIGMA LLC**

This Personal Data Privacy Policy (hereinafter — the "Privacy Policy") has been developed in order to comply with the requirements of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" and to ensure the protection of human and civil rights and freedoms in the processing of personal data, including the protection of the rights to privacy and to personal and family confidentiality.

Use of the services of the websites [paradigma-team.ru](http://paradigma-team.ru) / [pilgrim-search.ru](http://pilgrim-search.ru) (hereinafter — the "Websites") constitutes the User's unconditional acceptance of this Policy and of the terms of processing of their personal information set out herein; if the User does not agree with these terms, the User must refrain from using the services.

The User undertakes to monitor changes to the Privacy Policy independently by reviewing its current version.

### **1. General provisions**

1.1. For the purposes of this Policy, the User's personal information means:

1.1.1. Personal information that the User provides about themselves voluntarily when contacting us (via email / feedback forms) or in the course of using the services, including the User's personal data.

1.1.2. Data that is automatically transmitted to the Website's services in the course of their use by means of software installed on the User's device, including the IP address, cookie data, information about the User's browser (or other program used to access the services), technical specifications of the hardware and software used by the User, the date and time of access to the services, the addresses of requested pages, and other similar information.

1.1.3. This Privacy Policy applies only to websites with the following domain names: [paradigma-team.ru](http://paradigma-team.ru) / [pilgrim-search.ru](http://pilgrim-search.ru).

### **2. Purposes of processing users' personal information**

2.1. The Website collects and stores only the personal information that is necessary for the provision of services or the performance of agreements and contracts with the User, and no longer than required by the purposes of personal data processing, unless a personal data retention period is established by federal law or by a contract to which the personal data subject is a party. Upon achievement of the processing purposes, or if such purposes are no longer relevant, the processed personal data shall be destroyed or anonymized, unless otherwise provided by federal law.

2.2. Upon receipt of a notice from the User withdrawing consent to the processing of personal data, the Website shall cease processing the User's personal data within a period not exceeding 10 business days from the date of receipt.

2.2.1. A notice of withdrawal of consent to the processing of personal data shall be sent to the email address [info@paradigma-team.ru](mailto:info@paradigma-team.ru), or by written communication to the registered address of PARADIGMA LLC: Office 513, Premises 1-N, 27 Engelsa Ave., Litera Z, Svetlanovskoye Municipal District, St. Petersburg, 194156, Russia.

2.3. The Website processes the User's personal information for the following purposes:

2.3.1. Providing the User with access to personalized resources of the Website.

2.3.2. Establishing feedback with the User, including sending notifications and inquiries regarding the use of the Website and the provision of services, and processing the User's requests and applications.

2.3.3. Verifying the accuracy and completeness of the personal data provided by the User.

2.3.4. Notifying the User of new products and services, special offers, and various events.

2.3.5. Providing the User with effective customer and technical support in the event of problems related to the use of the Website.

2.3.6. Anonymized User data is used to collect information about Users' actions on the website and to improve the quality of the website and its content.

### **3. Terms of processing users' personal information and its transfer to third parties**

3.1. The confidentiality of the User's personal information shall be maintained, except where the User voluntarily makes information about themselves publicly available to an unlimited number of persons.

3.2. The Website may transfer the User's personal information to third parties in the following cases:

3.2.1. The User has consented to such actions.

3.2.2. The transfer is required under Russian law within the procedure established by law.

3.3. The processing of the User's personal data is carried out without any time limitation by the following means: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction of personal data, including in personal data information systems, with or without the use of automation tools. The processing of Users' personal data is carried out in accordance with Federal Law No. 152-FZ of July 27, 2006 "On Personal Data".

3.4. In the event of loss or disclosure of personal data, the Website Administration shall inform the User of such loss or disclosure.

3.5. The Website Administration takes the necessary organizational and technical measures to protect the User's personal information from unlawful or accidental access, destruction, modification, blocking, copying, or distribution, as well as from other unlawful actions of third parties.

3.6. The Website Administration, together with the User, shall take all necessary measures to prevent losses or other adverse consequences caused by the loss or disclosure of the User's

personal data.

#### **4. Obligations of the parties**

4.1. The User shall:

4.1.1. Provide the personal data required to use the Website.

4.1.2. Update and supplement the personal data provided if such data changes.

4.2. The Website Administration shall:

4.2.1. Use the information received solely for the purposes specified in this Privacy Policy.

4.2.2. Keep confidential information secret and not disclose it without the User's prior written permission, and refrain from selling, exchanging, publishing, or otherwise disclosing the User's personal data, except as provided for in this Privacy Policy.

4.2.3. Ensure the protection of the User's personal data during processing, including legal, organizational, and technical measures, against unauthorized, unlawful, or accidental access to personal data, and against the destruction, modification, blocking, copying, provision, or distribution of personal data, as well as against other unlawful actions with respect to personal data.

4.2.4. Block the personal data relating to the respective User from the moment of a request by the User, their legal representative, or the authorized body for the protection of the rights of personal data subjects, for the duration of the verification period, if inaccurate personal data or unlawful actions are identified.

#### **5. Liability of the parties**

5.1. If the Website Administration fails to fulfill its obligations, it shall be liable for losses incurred by the User in connection with the unlawful use of personal data, in accordance with the laws of the Russian Federation.

5.2. The Website Administration shall not be liable for the loss or disclosure of confidential information if such confidential information:

5.2.1. Became publicly available before its loss or disclosure.

5.2.2. Was received from a third party before it was received by the Website Administration.

5.2.3. Was disclosed with the User's consent.

#### **6. Additional terms**

6.1. The Website Administration may amend this Privacy Policy without the User's consent.

6.2. A new version of the Privacy Policy takes effect from the moment it is published on the Website, unless otherwise provided by the new version of the Privacy Policy.

6.3. The current version of the Privacy Policy is available at: [paradigma-team.ru](http://paradigma-team.ru) / [pilgrim-search.ru](http://pilgrim-search.ru).