

## Personal Data Processing Policy

In this document, LLC "RBS" INN: 7728875882 (also referred to as "we," "us," or "our") describes the procedure for processing the personal data of visitors to the website: <https://zc.guru/>.

If you have any questions regarding the processing of personal data, you may send a letter to:

- Our legal address: 117463, Moscow, Novoyasenevsky Prospekt, 32, Building 1, 1st Floor, Room VI, Office 60.
- Our official email address: [info@zc.guru](mailto:info@zc.guru).

We place great importance on protecting your privacy and the security of your personal data. Please carefully review this Personal Data Processing Policy (hereinafter referred to as the "Policy") to understand the purposes for which we process your personal data and how you can exercise your rights regarding your personal data.

### A Brief Overview of Personal Data and Your Rights in Its Processing

**Personal data** refers to any information that directly or indirectly relates to you or allows you to be identified.

**Personal data operator** is a legal or physical entity that processes personal data. When you visit our website, we become the operator of your personal data.

**Processing of personal data** refers to any actions performed with personal data.

In accordance with the Federal Law "On Personal Data," you have the right to:

- Access your personal data;
- Correct your personal data;
- Block or delete your personal data;
- Challenge our actions or inaction;
- Appeal decisions made solely based on automated processing of your personal data;

- Withdraw consent to the processing of personal data.

## How Can You Exercise Your Rights?

- You may submit a formal request to our address (117463, Moscow, Novoyasenevsky Prospekt, 32, Building 1, 1st Floor, Room VI, Office 60), specifying details of your identity document (type, series, number, issuing authority, and date of issue), your full name (or your representative's), information about your relationship with us confirming the processing of your personal data, and your signature (or your representative's).  
Such a request may also be sent to our email as an electronic document signed in accordance with Russian legislation on electronic signatures.
- You may also contact us via email: [info@zc.guru](mailto:info@zc.guru).
- You may appeal our actions as a personal data operator to the territorial office of Roskomnadzor in your region.

## Why Do We Process Your Personal Data?

In this section, we outline the purposes and duration of personal data processing and explain to whom we transfer your personal data.

Within the listed purposes, we may collect, record, systematize, store, update, modify, retrieve, use, transfer, block, delete, or destroy your personal data.

**Processing of Personal Data on** <https://zc.guru/>

### **Purpose – Creating a Personal Account**

**Subjects of personal data:** Users

To create your personal account, we will ask you to provide:

- ✓ Your name;
- ✓ Email address;
- ✓ Telegram username (nickname);
- ✓ Company details;
- ✓ Contact phone number.

During your interaction with us, we create a personal account for you on <https://zc.guru/>, through which we provide services for granting access to advertising platforms.

The personal data processed for this purpose does not fall under special or biometric categories under Articles 10–11 of Federal Law No. 152 and is processed automatically.

The legal basis for processing this data is the User Agreement under Clause 5, Part 1, Article 6 of Federal Law No. 152, accessible via the hyperlink under the data collection form.

Data obtained during registration is processed until the personal account is deleted and is destroyed within 30 days in accordance with Parts 4–5 of Article 21 of Federal Law No. 152.

Upon expiration of the processing period, the User's personal data is deleted from the information systems using built-in tools.

### **Purpose – Processing Support Requests**

**Subjects of personal data:** Users

To process your request, we may ask you to provide:

- ✓ Your name;
- ✓ Email address;
- ✓ Telegram username (nickname);
- ✓ Company details;
- ✓ Contact phone number.

The legal basis for processing is the User Agreement under Clause 5, Part 1, Article 6 of Federal Law No. 152.

Data is processed until the request is resolved and destroyed within 30 days.

### **Purpose – Providing Consultations for Requests Submitted via Website Forms**

**Subjects of personal data:** Users

To process your request, we may ask you to provide:

- ✓ Your name;
- ✓ Email address;
- ✓ Telegram username (nickname);
- ✓ Company details;
- ✓ Contact phone number.

The legal basis is Consent to Personal Data Processing under Clause 1, Part 1, Article 6 of Federal Law No. 152.

Data is processed until the request is resolved or consent is withdrawn (whichever comes first) and destroyed within 30 days.

### **Purpose – Handling Requests Received via Phone or Email**

**Subjects of personal data:** Users

To respond to your request, we may ask you to provide:

- ✓ Your full name;
- ✓ Email address;
- ✓ Telegram username (nickname);
- ✓ Company details;
- ✓ Contact phone number.

The legal basis is the Operator's legitimate interest under Clause 7, Part 1, Article 6 of Federal Law No. 152.

Data is processed until the request is resolved and destroyed within 30 days.

### **Purpose – Sending Marketing Communications**

**Subjects of personal data:** Users

To send marketing communications, we may ask you to provide:

- ✓ Your name;
- ✓ Email address;
- ✓ Telegram username (nickname);

- ✓ Company details;
- ✓ Contact phone number.

The legal basis is Consent to Personal Data Processing under Clause 1, Part 1, Article 6 of Federal Law No. 152.

Data is processed until communications cease or consent is withdrawn (whichever comes first) and destroyed within 30 days.

## **User Visit Analytics on Websites**

**Subjects of personal data:** Website visitors

**What are cookies?** Cookies are small files, typically consisting of letters and numbers, downloaded to your device when you visit certain websites. They allow websites to recognize your device.

We use cookies to enhance your experience on our websites:

- **Necessary cookies** – Enable basic functions like navigation and access to secure areas.
- **Statistical cookies** – Help us understand how visitors interact with our site (anonymous data).
- **Marketing cookies** – Track visitors across websites to display relevant ads.

We also use tracking technologies (tags, scripts) to collect:

- ✓ Your IP address;
- ✓ Location (country/city);
- ✓ Device OS and version;
- ✓ Browser type and version;
- ✓ Device type and screen resolution;
- ✓ Traffic source;
- ✓ Language settings;
- ✓ Online behavior data.

This data helps improve our services.

## Cookies used on our website:

Name	Provider	Purpose	Storage Period
_ym_d	Yandex	First visit date	1 year
_ym_isad	Yandex	Detects ad blockers	20 hours
_ym_visorc	Yandex	Tracks user actions	1 day
_ym_uid	Yandex	User behavior analytics	1 year

Data is processed until cookies expire and is then deleted.

You may disable cookies via your browser settings.

## Data Transfer to Third Parties

To provide and improve our services, we share your data with:

Purpose	Third Party (Location & Privacy Policy)	Purpose of Transfer	Address
Web analytics	LLC "Yandex" (Russia) <a href="#">Policy</a>	Web analytics (Yandex.Metrica)	119021, Moscow, Lva Tolstogo St., 16
Request processing	LLC "1C-Bitrix" (Russia) <a href="#">Policy</a>	Storing contact details	109544, Moscow, Blvd. Entuziastov, 2, 13th floor
Marketing emails	LLC "Carrot Quest" (Russia) <a href="#">Policy</a>	Email campaigns	614066, Perm, Kosmonavtov Shosse, 111d, Office 36

## Conditions for Processing Data Permitted for Public Dissemination

Regarding data published on our website:

- Transfer to unlimited parties is not restricted;
- Processing by unlimited parties is not restricted;
- Data may be transmitted via telecommunication networks.

## Data Security

We treat collected personal data as confidential and protect it from loss, alteration, or unauthorized access under Russian law. We implement technical and organizational measures and continuously improve our security systems.

### **Policy Changes**

We reserve the right to modify this Policy at any time. Please review it periodically. We will notify you of significant changes via available means.