

PERSONAL DATA PROCESSING POLICY

This personal data processing policy of "EO" LLC (further named as "PDP Policy" or "Policy") has been developed in accordance with the requirements of the existing legislation and sets out basic principles, purposes, conditions and methods of personal data processing, the lists of data subjects and personal data collected via the following websites available on the Internet at the following URL: <https://expoolimp.ru/>, <https://expoolimpia.com/>, as well as on platforms for hosting a web game <https://eoevents.website.yandexcloud.net/>, <https://feevents.website.yandexcloud.net/>.

"EO" LLC ensures complete observance of the rights and freedoms of Users in the course of personal data processing, including protection of right to personal and family privacy.

Using the services of the websites means unconditional acceptance by User of the hereby Policy along with all of the terms of processing the User's personal information; in case of disagreement with these conditions, the User shall refrain from using the services.

This PDP Policy regarding the whole information that «EO» LLC may get about the User during his or her use of the websites, its services, utilities, software and products possessed by «EO» LLC. "EO" LLC does not control and is not responsible for third-party websites to which the User can click on the links available on the Operator's websites.

1. TERMS AND DEFINITIONS USED IN THIS POLICY

1.1. User's personal data means and goes for:

- Any personal information User provides about oneself on his own while using the websites. Any other information is provided by User.
- The data is automatically provided to the websites services in progress of their being used by means of the software previously installed on User's device, including IP-address, cookie files data, data of User's browser (or any other software which accessing the Services is performed by), details of the equipment and software specifications utilized by User, date and time of accessing the Services, URL's of the requested pages and any other detailed information of the kind.

1.2. User is any individual who has voluntarily proceeded with the registration and/or has used the websites, utilities, software and products by "EO" LLC.

1.3. Web or Internet games (also online games) are games that are played online via the Internet;

1.4. Personal data operator is «EO» Limited Liability Company located as a legal entity at the following mail address: 191028, St. Petersburg, st. Furshtatskaya, 12A, apt. 18

1.5. Processing of Personal Data includes collection; recording; systematization; accumulation; storage; clarification (update, change); extraction; using; transmission (distribution, provision, access); depersonalization; blocking; deletion; destruction.

1.6. Automated processing of personal data - processing of personal data using computer technology;

1.7. Blocking of personal data - temporary termination of the processing of personal data;

1.8. Depersonalization of personal data - actions as a result of which it is impossible to determine, without using additional information, the belonging of personal data by a specific User or other subject of personal data;

1.9. Cross-border transfer of personal data - transfer of personal data to recipients are found on the territory of a foreign state, or to a foreign individual or foreign legal entity

1.10. Destruction of personal data - the process of rendering personal data inaccessible, irretrievable and unusable for any person;

1.11. Cookies are text files with small pieces of data — like a username and password — that are used to identify User's computer via the network.

2. LIST OF PERSONAL DATA PROCESSED AT “EO” LLC

2.1. Since the activities of EO LLC are aimed at creating and organizing educational online projects for under age children, consent to the processing of personal data is given by their legal representatives.

2.2. “EO” LLC collects and processes the following personal data:

- Surname, name of the legal representative;
- Legal representative's contact information: mobile phone number, e-mail address, registration address at the place of residence;
- Surname, name, of a child;
- Grade of study in accordance with the system of secondary general education.

2.3. Also “EO” LLC collects and processes the data which is automatically provided to the Website Services in progress of their use by means of the software previously installed on User's device, including IP-address, cookie files data, data of User's browser (or any other software which accessing the Services is performed by), details of the equipment and software specifications utilized by User, date and time of accessing the Services, URL's of the requested pages and any other detailed information of the kind.

3. PURPOSES OF PROCESSING USER'S PERSONAL DATA

3.1. “EO” LLC collects and processes personal data to achieve the following purposes: in order to identify User using the websites and registered personal website account; to provide User's access to personalized resources within the websites; establishing feedback with the User, including sending notifications or requests regarding: using websites, participating in games, preparing and issuing personal certificates, sending prizes based on the results of games; fraud prevention; confirmation of the accuracy and completeness of Personal Data; receiving and challenging payments from Users; Providing the User with customer and technical support in case of problems related to the use of websites; distribution of information about updates, special offers, prices, other information related to the use of websites, as well as the implementation of an advertising campaign.

3.2. The User can always refuse to receive informational messages by sending a letter to any of the specified e-mail addresses: ak1@mikebi.org, office@mikebi.org marked "Refusal to notify about new products, services and special offers."

4. PROCESSING THE USER'S PERSONAL DATA

4.1. “EO” LLC processes the User's personal data only if it is filled in or sent by the User independently through special forms located on the websites. Filling out the appropriate forms or sending his personal data to the “EO” LLC means unconditional acceptance of this Policy.

4.2. The Operator processes anonymized data about the User if it is allowed in the settings of the User's browser (the storage of cookies and the use of JavaScript technology are enabled).

5. STORAGE AND PROTECTION OF PERSONAL DATA

- 5.1. The personal data provided by User is stored on servers with limited access only, located on the servers Yandex Cloud, Database Hosting <https://www.ihc.ru/>, CRM system Bitrix24.
- 5.2. The personal data of the Users are stored without time-limit, but in any case no more than the date of receipt of the User's application for the destruction of data.
- 5.3. The security of personal data processed by the “EO” LLC is ensured through the implementation of legal, organizational and technical measures regulated by the Operator's Privacy Policy, developed in accordance with the requirements of current legislation.
- 5.4. Hereby PDP Policy along with relationship between the User and “EO” LLC, is subject to the current applicable Law of Russian Federation.

6. CROSS-BORDER TRANSFER OF PERSONAL DATA

- 6.1. Before starting the cross-border transfer of Personal Data, the Operator is obliged to make sure that the foreign state, to whose territory it is supposed to transfer Personal Data, provides reliable protection of the rights of Subjects of Personal Data.
- 6.2. Cross-border transfer of Personal Data to foreign States which do not meet the above requirements can be carried out only if the written consent of the Personal Data Subject is given to cross-border transfer of his personal data and / or the execution of the contract, to which the personal data subject is a party.

7. FINAL PROVISIONS

- 7.1. The User can get any clarifications on issues of interest relating to the processing of his personal data by contacting the Operator via the following contacts: 8(800) 301-64-02, ak1@mikebi.org, office@mikebi.org
- 7.2. This document will reflect any changes in the Personal Data processing Policy of the Operator. The Policy is valid without time limit until replaced by a new version.
- 7.3. The current version of the policy is freely available on the Internet at the Operator's websites.