

## USER DATA POLICY

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This document defines the procedure for processing and protection by the Company of personal data of users using the services of the Site. This Policy applies to any visitors to the site, regardless of their registration on the site and how they provide their data to the Company.

By providing any of his data to the Company, the User freely, by his own will and in his own interest, gives his specific, informed and conscious consent to the Company for their processing in accordance with this document.

### 1. Terms

- Site User - a visitor to the Site, registering a personal account on the Site, leaving an Application on the Site or using the Site and its services in any other way. For the purposes of this Policy, the User means the Customer, the Contractor and any other visitor to the Site.
- Company – LLC Zigmund AM, Address: 0029, RA, Yerevan, Arshakunyats 49, territory 22;
- Site - Internet resource <https://zigmund.online/>;
- Personal Data - any information relating to a directly or indirectly identified or identifiable natural person.

### 2. Data processed by the Company

The User may provide Personal Data to the Company by filling out an Application, sending messages to the Company in connection with the use of the Site, participation in the Company's marketing activities, and any other means of interaction with the Company provided for on the Site.

As part of interaction with Users, the Company processes personal and technical data.

For the purposes of this Policy, Personal Data includes information established by the applicable legislation and necessary for the Company to properly fulfill its obligations to the User when using the Site and the services provided on it.

Technical data includes data that is automatically transmitted by the User's device: information stored in cookies (cookies), information about the browser and its settings, date and time of access to the Site, addresses of requested pages, actions on the site or in the application, technical characteristics of the device, IP address, etc.

The Company's Website uses cookies. When using the Site, the User consents to the use of cookies in accordance with the Agreement and this Policy.

Cookies are small text files that are sent to the device when the User visits the Site. The cookies are then returned to the original Site on each subsequent visit. Cookies play the role of memory for the Site, allowing the Site to identify the User during his visits.

The company uses the following types of cookies:

Critical, without which the Site cannot function fully, for example, those that the Company uses to obtain data from the completed forms on the Site or to provide a secure connection to the Site.

- User, which collects data about the use of the Site and user preferences in order for the Company to provide Users with a more personalized version of the Site, for example, taking into account device data, font size, preferred Services, etc.

- Technical, which allow you to analyze the operation of the Site and collect statistics on its use, for example, to quickly solve technical problems.

The user can delete already saved files from his device and configure their use through the browser settings at his discretion. Disabling the use of cookies in whole or in part may affect the operation of the Site.

### **3. Purposes of data processing**

The processing of Personal Data means any action (operation) or a set of actions (operations) performed with or without the use of automation tools with Personal Data, including the collection, recording, systematization, accumulation, storage, clarification (updating, changing), use, transfer (distribution, provision, access), deletion of Personal Data.

The processing of the User's Personal Data is carried out in order to properly fulfill the Terms of Use of the Site, the Agreement for the provision of services posted on the Site and other rules and conditions governing the provision of services on the Site, carrying out the necessary marketing activities, registering the subject of Personal Data in the Company's database for subsequent sending to the User of postal messages and SMS messages or making phone calls by the Company, and / or on behalf of the Company of its affiliates, partners and / or subcontractors, information and news mailings, invitations to the Company's events and other information and for other purposes with the consent of the User.

The purposes of processing User Data are the fulfillment by the Company of the obligations assigned to it by the applicable legislation, as well as the exercise of the rights and legitimate interests of the Company and third parties, provided that this does not violate the rights and freedoms of the User.

The processing of the User's Personal Data may be carried out using automation tools and / or without the use of automation tools in accordance with applicable law.

### **4. Terms of Data processing**

Consent to the processing of Personal Data is given by the User for a period of 5 years from the date of deletion of the User's registration account on the Site.

The processing of Personal Data by the Company is terminated:

- After the expiration of the consent period or upon withdrawal of consent by the User, if after such withdrawal there are no other grounds for processing provided for by the applicable legislation, for example, the rules of the law on accounting;

- Upon liquidation of the Company;

- Upon achievement of the purposes of processing established by this Policy, the provisions of user agreements for the use of the Site, if there are no other grounds for processing provided for by the applicable legislation.

### **5. Data transfer**

The Company has the right to transfer personal data of Users or entrust their processing to third parties. Such a transfer, in particular, is necessary to enable the User to order psychological counseling services from a particular Contractor and to receive a service company's partner.

The Company has the right to entrust the processing of Personal Data to another person on the basis of an agreement concluded with this person, engage subcontractors for the processing of the Personal Data of the Personal Data Subject, and also has the right to transfer Personal Data for processing to subcontractors, banks, paying agents, its affiliates or partners, while ensuring acceptance by such persons of appropriate obligations in terms of processing and ensuring the confidentiality of Personal Data.

At the request and / or decision of government authorities, the Company may be required to transfer personal data to prosecutors / law enforcement and other authorities, to the extent that this is allowed or necessary in accordance with applicable law.

Cross-border transfers of Data are permitted, and the Company may only transfer Data to countries that provide an adequate level of data protection.

## **6. Data Protection**

The Company takes the necessary legal, organizational and technical measures in accordance to GDPR to protect Personal Data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution of Personal Data, as well as from other illegal actions in relation to Personal Data, and also takes on the obligation to maintain the confidentiality of the Personal Data of the subject of the Personal Data.

To ensure protection, the Company regularly checks for compliance with current legislation and updates, if necessary, internal documents and processes governing the processing of Data.

This Policy may be updated as necessary. The user is obliged to regularly get acquainted with the Policy. By continuing to use the Site and its services after making any changes to the Policy, the User confirms his agreement with the changes made to the Policy.

### **LLC Zigmund AM**

**Address: 0029, RA, Yerevan, Arshakunyats 49, territory 22**

**Reg number: 269.110.1226019**

**Tax number: 02297569**