

Privacy and Personal Data Processing Policy

September 29, 2025

1. General provisions, parties, purpose of the document

- 1.1. This Privacy Policy and Personal Data Processing (hereinafter referred to as the "Policy") defines the procedure and conditions for processing **by Zubareva IT Limited Liability Company** (TIN: 9707033487, OGRN: 1247700509385, address: 127055, Moscow, Lesnaya ul., 61 p. 2). 1c, hereinafter referred to as the "Operator") represented by General Director Natalia Zubareva, information about an individual that can be obtained by the Operator from this individual or from his legal representative (hereinafter referred to as the "User" or "Personal Data Subject") in the event of the following relations with the Personal Data Subject:
 - 1.1.1. when using the functions of the Mobile Application, its pages, their content, as well as Internet services and software offered by the Operator for use;
 - 1.1.2. when the Operator exercises the rights and obligations established by agreements / contracts concluded between the Operator and the User;
 - 1.1.3. when processing requests, complaints, requests, and messages sent by the Operator and the User to each other.
- 1.2. The purpose and purpose of the Policy is to ensure the proper legal treatment of personal data.

2. Basic concepts used in the Policy.

- 2.1. Automated processing of personal data – processing of personal data using computer technology;
- 2.2. Blocking of personal data – temporary termination of processing of personal data (except for cases when processing is necessary to clarify personal data);
- 2.3. Mobile application – mobile application of the Operator for devices running iOS or Android operating systems, including, but not limited to, the application called: Dr. Zubareva.
- 2.4. Personal data information system — a set of personal data contained in databases and information technologies and technical means that ensure their processing;
- 2.5. Depersonalization of personal data — actions that make it impossible to determine whether personal data belongs to a specific User or other personal data subject without using additional information;
- 2.6. Processing of personal data – any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access) depersonalization, blocking, deletion, or destruction of personal data;
- 2.7. Operator – a state body, municipal body, legal entity or individual that independently or jointly with other persons organizes and / or performs the processing of personal data, as well as determines the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data;
- 2.8. Personal Data – any information related directly or indirectly to a specific or identifiable User of the Mobile Application.

- 2.9. User (Subject of personal data) – a person who has obtained access to the use of the Mobile Application.
- 2.10. Provision of personal data – actions aimed at disclosing personal data to a certain person or a certain group of persons;
- 2.11. Dissemination of personal data – any actions aimed at disclosing personal data to an indefinite group of persons (transfer of personal data) or at making personal data available to an unlimited number of persons, including publishing personal data in the mass media, posting it in information and telecommunications networks, or providing access to personal data in any other way;
- 2.12. Cross-border transfer of personal data – transfer of personal data on the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity. The Operator does not transfer personal data across borders.
- 2.13. Destruction of personal data – any actions, as a result of which personal data is permanently destroyed with the impossibility of further restoration of the content of personal data in the personal data information system and (or) as a result of which the material carriers of personal data are destroyed.

3. Legal basis for processing personal data

3.1. The legal grounds for processing personal data are:

- 3.1.1. The legal grounds for processing personal data are: the processing of personal data is necessary for the performance of a contract to which the personal data subject is a party or beneficiary or guarantor, as well as for concluding a contract on the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor; providing access to services, information and/or the materials contained on the website, the Operator's services. The contract concluded with the personal data subject may not contain provisions restricting the rights and freedoms of the personal data subject; personal data processing is carried out with the consent of the personal data subject to the processing of his personal data; personal data processing is necessary for the exercise of the rights and legitimate interests of the operator or third parties.
- 3.2. The personal data subject makes a decision on the provision of his / her personal data and gives consent to their processing freely, voluntarily and in his / her own interest. Inaction of the personal data subject cannot be understood as consent. Consent to the processing of personal data must be specific, substantive, informed, conscious and unambiguous. Consent to the terms of the Policy can be expressed by the personal data subject through performing any of the following actions:
 - 3.2.1. conclusion of a contract with the Operator, such as, for example, a User Agreement; provided that the User is given the opportunity to read the full text of this Policy at each place of personal data collection;
 - 3.2.2. setting a symbol in the checkbox (in the input field) in the App next to the text of the form: "I consent to the processing of personal data under the terms of the Privacy Policy" or similar, provided that the User is given the opportunity to read the full text of this Policy at each place of personal data collection.

- 3.3. Performing specific actions specified in clause 3.2 of the Policy, as well as any use of the Application, means:
- full and unconditional acceptance of the terms of the Policy by the User without any exceptions or restrictions. In case of disagreement with any particular provision or with the Policy as a whole, as well as if it is impossible to provide the guarantees specified in the Policy, the User must refuse to use the Application.
 - that the User has all the necessary rights to register in the App and use them.
 - agrees to provide reliable, accurate and complete information about yourself required for registration in the App, and to keep this information up-to-date;
 - that the User is notified and agrees that the Operator is generally not obliged to verify the accuracy of the information provided by the User, except in cases where such verification is necessary to fulfill obligations to Users. The User understands and agrees that the information posted by the User in the Application, which allows reflecting information about the User in his profile, available for viewing by other Users of such an Application or users of the Internet information and telecommunications network, may be available to an indefinite number of people, taking into account the features of the Application's functionality and architecture and privacy settings.

4. Rules for processing personal data.

4.1. Purpose of personal data processing:

4.1.1. Purpose of processing the User's personal data:

- 1) conclusion, execution and termination of civil contracts;
- 4.1.2. Depersonalized User data collected using Internet statistics services is used to collect information about User actions in the App, improve the quality of the App and its content.

4.2. Categories and liver of processed data:

- 4.2.1. Surname.
- 4.2.2. Name.
- 4.2.3. Phone number.
- 4.2.4. Email.
- 4.2.5. Date of birth
- 4.2.6. Paul
- 4.2.7. Email address.
- 4.2.8. Photo.
- 4.2.9. Other information specified by the User in the consent to the processing of personal data.

4.3. Categories of subjects whose personal data is processed: subjects of personal data - Users of the Application.

4.4. **Processing methods:** collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, depersonalization, transfer (access, provision), blocking, deletion, destruction of personal data.

4.5. **Processing and storage period:** until the personal data subject receives a request to terminate processing/revoke consent, or 5 (five) years, unless

otherwise specified in the corresponding User's consent to the processing of personal data.

4.6. **Procedure for the destruction of personal data** when the purpose of their processing is achieved or when other legal grounds arise: the person responsible for the processing of personal data destroys the data.

4.7. **Procedure for collecting, storing, transmitting and other types of personal data processing**

4.7.1. 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 the current legislation in the field of personal data protection.

4.7.2. The Operator ensures the security of personal data and takes all possible measures that exclude access to personal data of unauthorized persons.

4.7.3. If inaccuracies in personal data are identified, the User can update them independently by sending a notification to the Operator's email address info@zubarevaapp.ru marked "Updating personal data".

4.7.4. The User's personal data is destroyed in the following cases:

4.7.4.1. Deletion by the Operator of the User's Account in the Application, or information posted by the User in the Application, as well as as a result of taking measures to delete information by decision of regulatory and/or law enforcement agencies in accordance with applicable law.

4.7.4.2. Self-deletion of the User's Account in the App.

4.7.4.3. Self-deletion of Information from the User's Profile in the App by the User.

4.7.4.4. When deleting a User's Account in the cases specified in clause 4.7.4 of the Policy, the Operator fulfills its obligations to store the necessary Information on its electronic media for the period established by the current legislation.

4.8. **About the cookie technology:**

4.8.1. Cookies: This is a piece of data sent by the Operator's server and stored on the device of the Personal Data Subject. The contents of such a file may or may not relate to personal data, depending on whether such a file contains personal data or contains depersonalized technical data.

4.8.2. The subject of personal data has the right to prohibit its equipment from receiving this data or restrict the reception of this data. If you refuse to receive such data or restrict data reception, some of the App's functions may not work correctly. The subject of personal data undertakes to set up their own equipment in such a way that it provides an adequate mode of operation and level of protection of cookie data, and the Operator does not provide technological and legal advice on topics of this nature.

5. Transfer of personal data.

5.1. **Transfer of personal data to third parties and dissemination of personal data:**

The Operator has the right to transfer (by way of access and provision) personal data to the following third parties:

- companies-legal successors in case of reorganization of the Operator, affiliated companies;
- authorities, law enforcement agencies, other official or state bodies or courts to which the Operator is required to provide information upon request in accordance with applicable law;

- persons providing legal protection to the Operator or third parties in case of violation of their rights or threat of violation of their rights, including violation of laws or regulatory documents;
- if the personal data subject himself has expressed consent to the transfer of personal data to a third party, or the transfer of personal data is required to provide the Application function directly requested by the personal data subject or to provide the directly requested service, as well as to fulfill an agreement or contract concluded with the Operator.

6. Change of the Privacy Policy. Applicable law.

- 6.1. The Operator has the right to make changes to this Policy. The new version of the Policy takes effect from the moment it is posted, unless otherwise provided by the new version of the Policy.
- 6.2. The current version of the Policy is freely available for review by the User in the App.

7. Final provisions.

- 7.1. Information for exercising the rights of the personal data subject: The personal data subject can exercise all the rights inherent in the personal data subject, as well as get clarification on issues related to the processing of personal data, by contacting the Operator at the Operator's email address `Оператор: info@zubarevaapp.ru`
- 7.2. The place of consent and the place of Policy execution is always the location of the Operator, and the law applicable to the relationship between the Operator and the Personal Data Subject is always the law of the Russian Federation, regardless of where the Personal Data Subject is located or the equipment used by him. All disputes and disagreements are resolved at the Operator's location, unless otherwise provided by law.
- 7.3. The personal data subject undertakes to use the details provided in this Policy to send requests for the exercise of the rights of the personal data subject or complaints about the inaccuracy of information or the illegality of its processing. Such requests and complaints are considered within a period not exceeding 10 (Ten) business days from the date of receipt by the Operator.

8. Operator's banking details.

Zubareva IT Limited Liability Company

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OGRN: 1247700509385

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