

## **PRIVACY POLICY**

Below is a Privacy Policy regarding the stepium recourse, hereinafter Policy.

This Policy concerns data of the Resource Users, which the Company has the right to collect, use and process.

This Policy is an appendix to the Terms of Use posted on the Resource in the corresponding section. All terms and conditions defined by the Terms of Use are applicable in this Policy and have a similar meaning.

References in this Policy of personal data related to the user only to the extent of information that he voluntarily indicated resources.

For the purposes of this Policy, the term "**personal data**" means information that enables an individual to be identified and the term "**information**" is used in all other cases for other data specified by the User in the Account or information about the activity of the User, for example, the use of the Resource, if such use does not allow to establish the identity of the latter.

### **1. GENERAL PROVISION**

- 1.1.** This Policy shall regulate the objectives, procedure, use, transfer, protection and collection of information which the Company collects in the process of using the Resource.
- 1.2.** The Company shall respect and protect the User's right to privacy and undertake to take all necessary measures for this.

USING THE RESOURCE, THE USER SHALL AGREE TO THIS POLICY, SO THE USER SHALL CONSENT TO COLLECTION, USE AND DISTRIBUTION OF HIS/HER PERSONAL DATA AND OTHER INFORMATION SPECIFIED BY HIM/HER IN ACCORDANCE WITH THIS POLICY AND APPLICABLE LAW

### **2. REGISTRATION**

- 2.1.** When registering, it is enough to fill in the registration form, marked as mandatory.
- 2.2.** The User shall provide complete, accurate and reliable information in accordance with the clauses of the registration form.
- 2.3.** The User has the right not to indicate his real name when registering, using a user name, and also not to enter other data that allows him to identify, except for those data, the indication of which is mandatory: login, password, e-mail address.

THE USER UNDERSTANDS AND ACCEPTS THE FACT THAT HE IS RESPONSIBLE FOR THE CORRECTNESS OF THE DATA THAT ARE USED DURING REGISTRATION.

### **3. COLLECTION AND USING OF DATA**

- 3.1.** The User, at his own discretion, is entitled to provide the following information:
  - 3.1.1. Surname;
  - 3.1.2. Mobile phone number;
  - 3.1.3. Skype login;
  - 3.1.4. A link to a page on social networks (for example, Facebook);
  - 3.1.5. The country from which it accesses the Resource.

- 3.2. The provided information is stored in the User Account with which it uses the Resource.
- 3.3. The telephone number, e-mail address can be used by the Company to form and provide the User with current offers and recommendations regarding the use of the Resource. The email address can also be used to send updates and resource news. The User may refuse to receive such messages.
- 3.4. Each User has the right to view, edit and delete in his / her Account information and / or personal data that were specified by him at the time of registration. In this case, cannot remain empty mandatory fields for registration.
- 3.5. The Company also saves the date and time of the last authorization of the User and the IP address from which the resource was accessed.
- 3.6. The Company keeps personal data and other information of the Users until the User requests the removal of the specified information.

#### **4. STORAGE OF INFORMATION**

- 4.1. The company acts as a custodian of information and undertakes not to disclose or not to transfer to third parties the personal data and other information collected during the provision of services, except in the cases provided for this Policy or expressly provided by the Legislation.
- 4.2. The Company does not sell, rent, or share personal information with third parties.
- 4.3. The company interacts with the government and representatives of executive authorities to implement and comply with the law. A Company may disclose personal data, in good faith believing that it is authorized to do so, or that such conduct is justifiably necessary or justified to comply with the law, or legal process, or the requirements of public authorities; in response to any complaints, or to protect the rights, property or safety of the Company, its Users, employees or society, including but not limited to fraud, abuse, violation of the Terms of Use or unlawful use of the Resource.
- 4.4. The Company may disclose to the official request of the public authorities information necessary for the investigation, for example, the name of the User, telephone, e-mail, etc.

#### **5. INFORMATION SECURITY**

- 5.1. The Resource is equipped with specific measures to ensure the security and protection of personal information and personal data of Users from their loss, abuse, unauthorized access, disclosure, modification or destruction.
- 5.2. The Company draws attention to the fact that none of the existing methods of data transmission can be absolutely safe. Therefore, despite all the security measures taken, the Company can not guarantee the complete safety of information and data.

THE COMPANY IS NOT LIABLE FOR THE ILLEGAL ACTIONS OF THIRD PARTIES, HACKERS, INTRUDERS AND OTHER VIOLATORS WHO MAY VIOLATE THE TERMS OF THIS POLICY AND ATTEMPT TO SEIZE ALL OR PART OF THE PERSONAL INFORMATION AND PERSONAL DATA OF USERS AND USE IT FOR PERSONAL PURPOSES.

THE COMPANY IS NOT LIABLE FOR ANY ACTIONS OR INACTIONS OF USERS AND THIRD PARTIES REGARDING THE USER'S PERSONAL DATA, REGARDLESS OF WHETHER THE DATA WAS OBTAINED BY USING THE RESOURCE OR IN ANY OTHER WAY, IF ACCESS TO SUCH DATA WAS NOT FROM THE COMPANY'S FAULT.

#### **6. USE OF LINKS**

- 6.1. The Resource can contain links to third-party sites. The Company shall not be liable for the content and activities of such sites and the provision of confidentiality for them, and for any damage caused and arising as a result of user visits to such sites.
- 6.2. The transmission of personal information when visiting external sites, even if they contain links to the Company Website, does not fall under the terms of this Policy. The Company is not responsible for the actions of third-party sites. Collection and transfer of personal information and personal data Users are regulated by documents on the use of such information, posted on external sites.

## **7. POLICY ADDITIONS**

- 7.1. The Company may modify or update this Policy without further notice to Users.
- 7.2. Any changes or additions to this Policy come into force from the moment of their publication on the Resource in the corresponding section.
- 7.3. If the User continues to use the Resource after making changes to the Policy, this means that you agree with such changes.

## **8. REQUESTS AND COMPLAINTS**

- 8.1. If you have any questions about the Policy or the Resource, you can contact the Company through the Feedback Form.
- 8.2. The Company checks all complaints about alleged violations of rights and, guided by the Legislation and the Terms of Use, terminates the Accounts, the owners of which systematically violate the law or carry out other actions prohibited by the Rules of Use.