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# **Agaton Ltd Personal Data Processing Policy**

Version 2.0

## Revision history

<b>Revision date</b>	<b>Person responsible</b>	<b>Summary of changes</b>
May 13, 2022	Rustam Klepcha	Version 2

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## **1. SCOPE OF APPLICATION**

- 1.1. This Policy applies to Agaton Ltd. (hereinafter referred to as the **Company or Agaton**) and sets forth procedures for obtaining, processing and protecting any information, including personal data of individuals (hereinafter referred to as the **Personal Data Subject or Subject**), within the meaning of applicable law, in connection with:
  - 1.1.1. business activities carried out in accordance with the Company's statutory documents aimed at meeting the needs of other persons (hereinafter referred to as the **Service**);
  - 1.1.2. implementation of employment relations;
  - 1.1.3. conclusion and execution of contractual obligations, as well as in the course of execution of any agreements and contracts relating to Personal Data Subjects.
- 1.2. The Personal Data Processing Policy (hereinafter referred to as the **Policy**) is an appendix to the Privacy Policy and applies to any information including personal data of individuals (hereinafter referred to as the **Personal Data**).
- 1.3. The individual who provided his Personal Data to the Company in the process of receiving the Service and using any websites (hereinafter referred to as the **Website**), programs, products and/or Internet services (hereinafter referred to as the **Services**) owned by Vimbox, or in the process of establishing contractual relations with Vimbox, is a User.
- 1.4. The main categories of processed personal data subjects are specified in Appendix 1.
- 1.5. This Policy shall apply to:
  - 1.5.1. Agaton personnel (Agaton personnel shall mean employees under employment contracts and partners providing services to Agaton under civil contracts) (hereinafter referred to as the **Personnel**);
  - 1.5.2. Agaton shareholders;
  - 1.5.3. Agaton directors;
  - 1.5.4. tutors, students, methodologists, parents of students, and potential users;
  - 1.5.5. Agaton counterparties, if applicable.
- 1.6. The requirements of the Policy shall be taken into account and applied to legal entities:
  - 1.6.1. members of the Skyeng Group (hereinafter referred to as the **Group Companies**);
  - 1.6.2. other persons when it is necessary for them to participate in the processing of Personal Data (e.g., when data is routinely transferred from Agaton to Group Companies and other counterparties on the basis of orders for the processing of Personal Data, other agreements and contracts).
- 1.7. The list of such legal entities is specified in Appendix No. 2 to this Policy.

## **2. PURPOSES AND LEGAL BASIS OF PROCESSING**

- 2.1. The purposes for processing Personal data determine its content and scope.
- 2.2. Agaton shall collect and use Personal data for the following purposes:
  - 2.2.1. necessity for our legitimate business interests;
  - 2.2.2. contract with Subjects to use the Services as defined in the Articles of Association;
  - 2.2.3. ensuring financial and economic activities of the Company;
  - 2.2.4. compliance to legal obligations;
  - 2.2.5. protection of its legal rights and execution of judicial and/or administrative orders, if necessary.

### **2.3. Legal basis for processing personal data**

- 2.3.1. The Policy has been developed taking into account the provisions of legislation in the field of Personal Data processing, in particular but not limited to the European General Data Protection Regulation approved by Regulation (EU) 2016/679 of the European Parliament and of the Council dated April 27, 2016 (hereinafter referred to as the **GDPR**).

<b>Purposes of Personal Data Processing</b>	<b>Rights and obligations of the Company and the personal data subject</b>
<p>2.3.2. Fulfillment of contractual obligations</p>	<ul style="list-style-type: none"> <li>• provision of paid and free services to the personal data subjects;</li> <li>• exercise and performance of rights and obligations, including for the performance of the contract, a party or beneficiary or guarantor of which is the personal data subject, as well as for the conclusion of the contract at the initiative of the personal data subject or the contract under which the personal data subject will be a beneficiary or guarantor;</li> <li>• improving the quality of the services provided, as well as related services;</li> <li>• communicating with Subjects when necessary, including for sending notifications, information and requests related to the provision of Services, as well as for processing applications, requests and other communications received from them.</li> </ul> <p>(1) These notifications include:</p> <ul style="list-style-type: none"> <li>• payment information,</li> <li>• marketing and promotional notifications (mailings) about Agaton's news, products and Services (messages are sent only if the Subject consents to receive them).</li> </ul> <p>(2) At any time on a gratuitous basis the Subject has the right to refuse to receive notifications (mailings) and other information, using a special procedure of refusal of such mailings, if it does not affect the quality of the Services provided.</p>
<p>2.3.3. Compliance with statutory requirements and obligations</p>	<ul style="list-style-type: none"> <li>• execution and fulfillment of functions, powers and duties assigned as a processor (operator);</li> <li>• execution of a judicial act, act of another authority or official to be executed in accordance with the enforcement proceedings;</li> <li>• fulfillment of orders of other personal data processors.</li> </ul>

<p>2.3.4. Ensuring legitimate interests</p>	<ul style="list-style-type: none"> <li>• carrying out activities stipulated by the Company's statutory documents;</li> <li>• creation of new products and offers;</li> <li>• Collecting, processing and presenting statistical data and other research based on impersonal personal data;</li> <li>• Recruitment (selection of Personnel), including for the purpose of ensuring that candidates for vacant positions are selected for the relevant vacant positions, and employment of successful candidates for the relevant vacant positions;</li> <li>• conclusion, execution and termination of civil contracts;</li> <li>• exercising and fulfillment of rights and obligations arising from labor relations, including for the purpose of assisting employees in employment, education and promotion, ensuring their personal safety, monitoring the quantity and quality of work performed and safeguarding property, payment of wages and other payments due to the employee, in accordance with law or contract, as well as making tax and social deductions;</li> <li>• exercising the rights and legitimate interests as an operator or third parties, including protection against copyright infringement, fraud and other unfair behavior;</li> <li>• settlements with the personal data subjects.</li> </ul>
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### 3. PROCEDURE AND TERMS OF PERSONAL DATA PROCESSING

Personal Data Processing means any operation or set of operations that is performed on Personal Data or sets of Personal Data, whether or not used by automated means, such as collection, recording, organization, structuring, storage, adaptation or modification, extraction, consultation, use, disclosure by transmission, dissemination or other provision, alignment or combination, restriction, depersonalization or destruction.

#### 3.1. Collection of data

- 3.1.1. Personal data shall be collected directly from the Personal Data Subject. If provision of the requested information is mandatory in accordance with legal requirements, the Subject shall be explained the legal consequences of refusal to provide it.
- 3.1.2. Receipt of Personal Data from other persons shall be possible only on legal grounds, and with the notification of the Subject.
- 3.1.3. Collection and processing of Personal data that does not meet the stated purposes shall not be permitted.
- 3.1.4. If the Subject does not wish to update Personal data or wishes to opt out of receiving newsletters (e.g., marketing), he may fill out an opt-out form and send it to the email address dpo@skyeng.eu.

#### 3.2. Obtaining the Subject's consent to the Personal data processing

- 3.2.1. Personal data processing shall be carried out in accordance with the provisions of applicable law and the agreement with the Subject, after obtaining explicit and specific consent from him.
- 3.2.2. Consent may be expressed by the Subject in the form of a contingent action, e.g.:
- 3.2.2.1. marking, filling in the appropriate fields in the forms, blanks;

- 3.2.2.2. electronic correspondence, which states about processing;
- 3.2.2.3. passing to the Company's office territory after familiarization with the warning signs;
- 3.2.2.4. other actions performed by the Subject, from which his will can be judged.

**3.3. Description of information processed on the basis of consent**

- 3.3.1. In certain cases provided for by law as well as other applicable requirements, consent shall be in writing or in standard forms.
- 3.3.2. When processing Personal data received not from the Subject directly, but from other persons on the basis of a contract or an order for processing, the obligation to obtain the consent of the Subject shall be imposed on the person from whom the Personal data was received.
- 3.3.3. If the Subject refuses to provide sufficient Personal data, the Company will not be able to carry out the necessary actions to achieve the purposes of the processing (for example, if the Subject does not complete the registration procedure in the Service, the Service under the contract may not be provided to him, or his resume will not be considered for a job, etc.).
- 3.3.4. The Personal Data Subject has the right to withdraw his consent to the Personal Data processing by sending the corresponding request to Agaton or an authorized representative (DPO) by mail to dpo@skyeng.eu.

**3.4. Storage conditions**

- 3.4.1. When storing Personal data, Agaton shall follow the Standard Contractual Clauses approved by the European Commission to ensure an adequate level of protection of Personal data. The list of providers of Personal data storage Services is specified in Appendix No. 2.
- 3.4.2. The subject located in the territory where consent is required for the transfer of his Personal data to another jurisdiction, shall provide Agaton with his explicit and unambiguous consent for such transfer or storage, and/or processing of information in other specified jurisdictions.
- 3.4.3. Agaton shall store Personal data in the European Economic Area (hereinafter referred to as the **EEA**) and/or in the Russian Federation, depending on the purpose of its processing.
- 3.4.4. Russia is a jurisdiction outside the EEA that has not been recognized by the European Commission as providing an adequate level of personal data protection, so appropriate measures shall be taken to ensure that such transfers are made in accordance with current EU data protection rules.

**3.5. Storage period**

- 3.5.1. Personal data shall be stored for as long as necessary to achieve the purpose for which it was collected or to comply with legal requirements or other regulations governing the conditions for its processing.
- 3.5.2. A longer storage period may be required or permitted on the basis of legal requirements, as well as provided for by contractual or user agreements.

Category	Storage period
3.5.3. Personal data subject	84 months after receipt of the Service

3.5.4. Contractor processing Personal Data	one month after termination of the contract
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### 3.6. Conditions for destruction or depersonalization

3.6.1. At the end of the period of storage of Personal data due to the purposes of its processing, Agaton shall do the following:

3.6.1.1. deletes excess Personal Data; or

3.6.1.2. depersonalizes it so that it is no longer tied to the User or the Personal Data Subject. Such depersonalized data may be used for research, statistical purposes or to improve the quality of our Services. At the same time, Agaton has the right to use it indefinitely without prior notice.

Conditions for destruction or depersonalization	Storage period	Subject
3.6.2. Achievement of the purpose of Personal Data processing or the maximum period of its storage	within 30 days	Agaton  (manually or automatically)
3.6.3. Loss of necessity in achieving the purposes of Personal Data processing	within 30 days	
3.6.4. Provision by the Personal Data Subject or his legal representative of confirmation that the Personal Data is illegally obtained or is not necessary for the stated purpose of processing	within 7 days	
3.6.5. inability to ensure the lawfulness of Personal Data processing	within 10 days	
3.6.6. Withdrawal of consent to the Personal Data processing by the Personal Data Subject, if the preservation of personal data is no longer required for the Personal Data processing	within 30 days	
3.6.7. Withdrawal of consent by the Personal Data Subject to use Personal Data for contacts with potential consumers in the promotion of goods and services	within 2 days	



<p>3.6.8. Expiration of the limitation period for legal relations, within which Personal Data is processed or was processed</p>		
<p>3.6.9. Liquidation (reorganization) of the Company, if the processing was carried out exclusively in the interests of this organization and there is no legal successor</p>		

**4. UPDATING, CORRECTING, DELETING AND DESTROYING DATA, RESPONDING TO SUBJECTS' REQUESTS FOR ACCESS TO PERSONAL DATA**

- 4.1. Agaton does not verify the Personal Data provided to it, except as provided in contractual or user agreements or in the terms of use of certain Services and cannot judge its accuracy and does not have sufficient legal capacity to provide the Personal Data.
- 4.2. The accuracy of the Personal data and its adequacy and relevance in relation to the purposes of processing shall be ensured if it is necessary to protect the legitimate interests of Agaton. In this case, if inaccurate or incomplete Personal Data is detected, it may be clarified and updated.

<b>Right</b>	<b>What the Subject has the right to do</b>	<b>How to exercise the right</b>	<b>Notes</b>
<p>4.3. To get access to Personal Data</p>	<p>(1) To get confirmation of Personal Data processing; (2) To get access to the Personal data, as well as information about its processing.</p>	<p>please contact the DPO</p>	<p>The company may ask you to verify your identity before responding to a request,</p>
<p>4.4. To correct inaccurate data</p>	<p>To request correction of any incomplete or inaccurate data.</p>	<p>please contact the DPO</p>	<p>and in certain circumstances may charge a fee to cover our costs.</p>
<p>4.5. To object to processing</p>	<p>To object to the Personal Data processing if we process it for our own legitimate interests, use it for direct marketing or for statistical purposes.</p>	<p>please contact the DPO</p>	<p>The response time is one month after your request is received.</p>
<p>4.6. To require us to make your data portable</p>	<p>Under certain circumstances, to request a copy of Personal data in a structured, commonly used and machine-readable format.</p>	<p>please contact the DPO</p>	<p>If your request takes longer to process, we will notify you. In any</p>

4.7. To remove the Personal Data (in whole or in part)	Under certain circumstances, to request the deletion of Personal data. For example, if we no longer need it, or if the Subject withdraws the consent that was the basis for processing the data.	please contact the DPO	case, we cannot extend the response time for more than two months beyond the first month of your request.
4.8. To withdraw consent to data processing	To revoke the consent to the Personal Data processing.	please contact the DPO	
4.9. To limit processing	To ask to limit or stop the collection, use, processing and/or disclosure of Personal data.	please contact the DPO	
4.10. To be informed about the precautions we take when transferring data to a third country or international organization	To ask us about these measures	please contact the DPO	
4.11. To file complaints	To complain to the data protection supervisory authority about our collection and use of Personal data.	please contact your local regulatory authority	

4.12. The Subject or his legal representative may submit the request to provide/update information about the processing of his Personal data, or to delete it, but the request shall not include a requirement to provide/change data relating to other Subjects. The request of the Subject or his/her representative shall contain (at least):

- 4.12.1. the number of the main document certifying the identity of the Subject or his/her legal representative;
- 4.12.2. information confirming the Subject's participation in a relationship with Agaton (contract number, contract conclusion date or other information), or information otherwise confirming the fact of Personal Data processing;
- 4.12.3. signature of the Personal Data Subject or his legal representative.

4.13. Agaton has the right to reject the Subject's request to enforce rights if it is permitted or required under:

- 4.13.1. Cyprus data protection legislation, which we shall comply with;
- 4.13.2. the legal requirements that the data controller with whom we cooperate shall comply with.

4.14. In case of rejection of the claim, Agaton shall provide a response, stating the grounds for the rejection.

4.15. The subject or his or her legal representative has the right to file a complaint against our rejection with the supervisory authority.

4.16. Ensuring the protection of information

4.16.1. Personal data belongs to the category of confidential information and shall be protected from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution, as well as from other unlawful actions in relation to it.

4.16.2. When Personal Data processing, the Company shall take reasonable and sufficient legal, organizational and technical measures, maintaining a balance between its legitimate interests and protection of confidentiality of Personal data.

## **5. POLICY UPDATE**

5.1. Agaton has the right to make changes at its discretion, including, but not limited to, where the relevant changes relate to changes in applicable law.

5.2. This Policy is written in English and Russian. In the event of any discrepancies or any inconsistencies in the meaning of the terms of this Policy, the English version of this Policy shall prevail.

## **6. POLICY PLACEMENT**

Unrestricted access to this Policy and its Appendices shall be provided to all interested parties, including Personal Data Subjects and authorities exercising control and supervisory function in the field of Personal Data processing.

## **7. CONTACTS**

If you have any questions, comments or requests regarding this Policy, please contact our Data Protection Officer at [dpo@skyeng.eu](mailto:dpo@skyeng.eu).

## 1. The main categories of processed personal data subjects

- 1.1. Personal information shall be collected and processed in order to fulfill contractual obligations, as well as the legitimate interests of the Company.

<b>Category</b>	<b>Personal data</b>
1.2. Shareholders and founders of Agaton	Information necessary for registration of employment and civil law relations, in particular documents containing the name, surname, photo, date of birth and the main identity document number.
1.3. Individuals who have or have had an employment or civil law relationship with Agaton or legal entities belonging to the Skyeng Group, as well as individuals who intend to enter into such a relationship (e.g., applicants for vacant positions)	<p>(1) Information necessary for registration of employment and civil law relations, in particular, but not limited to: documents containing the name, surname, photo, date of birth and the main identity document number.</p> <p>(2) Agaton has the right to further verify the Personal data provided by the Subject.</p> <p>(3) Personal data about next of kin and/or references may be collected in the course of employment and civil law relations.</p>
1.4. Individuals listed in publicly available and other sources that are lawfully obtained and used in the provision of Agaton Services as data sources	Personal data provided in publicly available and other sources, such as: name, contact information (e.g., phone number and/or email), and other information necessary to provide the Services (e.g., address, age, etc.)
1.5. Users, including minors	copy of the identity document and bank account details (on request); full name; email address; phone number; links to user account in Google; accounts on facebook.com, vk.com, ok.ru; accounts in messengers: WhatsApp, Viber, Telegram, Skype; whether you open our emails and follow the links in them; current location; gender; date of birth; photos, video and audio recordings of lessons; level of English (beginner and advanced); purpose of study; hobbies and interests; area of work; information about participating in lessons; phone records. For minors - in addition to the information listed in the current paragraph: information about the user's family members; information about the school the user is attending; the subject of interest (English or Math lessons); additional courses, classes etc. (e.g., tutors)

1.6. potential user (you register on the Platform, but you do not purchase classes).	full name; gender; email address; phone number; current location; date of birth; English level; purpose of study; hobbies and interests; occupational field; whether the user opens our emails and clicks on links in them; information about participating in lessons; language; address (city and region/area); phone records
1.7. the user responsible for launching corporate program in the company	full name; email address; phone number; current location; phone records; correspondence
1.8. tutor	copy of identification document; photo; gender; date of birth; photographs, video and audio recordings of classes; current location; educational information; examination certificates; resume; phone records
1.9. methodologist or other contractor	copy of an identity document; current location; photo; gender; date of birth; phone records
1.10. parents of underage users	date of birth; gender; current location; phone records
1.11. Individuals who have contacted Agaton with requests, messages, statements, complaints, suggestions using contact information or means of collecting feedback	<p>Information confirming the author of the request, in particular, but not limited to: documents containing the name, surname, date of birth and number of the main document certifying the identity of the applicant or the identity of his representative.</p> <p>Agaton has the right to further verify the Personal data provided by the Subject.</p>
1.12. Individuals participating in interviews, surveys, analytical and	Personal data necessary for the interaction, such as: name, contact information (e.g., telephone number and/or email).

marketing research on Agaton activities	
1.13. Visitors to Agaton office sites	Personal data necessary for the interaction, such as: name, contact information (e.g., telephone number and/or email).

**1. Terms of disclosure****1.1. Competent authorities**

- 1.1.1. Upon request, as well as when required by this Policy or applicable law, and only to the extent necessary based on the purpose of the disclosure.
- 1.1.2. To resolve any conflict or dispute arising between the Entities and the Company.

**1.2. Data processors (Partners)**

- 1.2.1. Agaton may receive Personal data from its Partners (hereinafter referred to as the **Partners**) and/or affiliates, including those in the same group as Agaton (hereinafter referred to as the **Skyeng**), when using websites, programs, products or Internet services. In such cases, transfer of Personal data shall be made in accordance with applicable law and shall be subject to specific agreements between Agaton and each of the Partners.

<b>Jurisdiction</b>	<b>Legal entities of Skyeng Group</b>
1.2.2. European Economic Area (EEA)	Vimbox Ltd (The Republic of Cyprus) Langroom Ltd (The Republic of Cyprus) Brandeston Ltd (The Republic of Cyprus) Skyeng Technology S.l.u (Spain) Skymath Ltd (USA) Sky Language Technology Hong Kong Ltd
1.2.3. The Russian Federation	Sky Service Rus, LLC Education Technologies, LLC EDUCATIONAL AUTONOMOUS NON-COMMERCIAL ORGANIZATION OF ADDITIONAL PROFESSIONAL EDUCATION "SKYENG" SKYENG, LLC Language Innovations, LLC

- 1.2.4. Legal entities belonging to the Skyeng Group may act as persons processing Personal datarmation on the basis of contracts and other agreements. Such cases include, for example, the following:
- 1.2.4.1. granting customers the rights to use software products;
- 1.2.4.2. provision of Services to customers related to data processing;
- 1.2.4.3. joint processing with third-party organizations within the partnership.

### 1.3. Payment systems and services

1.3.1. We transfer and disclose Personal data, including the identity document number and/or date of issue, copies of identity documents (such as a passport) to the following providers of billing and payment services:

<i>Payment system and service</i>	<i>Where to read the personal data processing policy or privacy policy (if available)</i>
ECOMMPAY	<a href="https://ecommpay.com/privacy-policy/">https://ecommpay.com/privacy-policy/</a> <a href="https://ecommpay.com/privacy-policy/">https://ecommpay.com/privacy-policy/</a>
Bank 131	<a href="https://131.ru/static/personal_data_processing_policy-b1c2dc8f6f111ade759d9493a882227c.pdf">https://131.ru/static/personal_data_processing_policy-b1c2dc8f6f111ade759d9493a882227c.pdf</a> <a href="https://yandex.ru/legal/confidential/">https://yandex.ru/legal/confidential/</a>
Solar Staff	<a href="https://solar-staff.com/docs/privacypolicy.pdf">https://solar-staff.com/docs/privacypolicy.pdf</a>
PayPal	<a href="https://www.paypal.com/cy/webapps/mpp/ua/privacy-full">https://www.paypal.com/cy/webapps/mpp/ua/privacy-full</a> <a href="https://www.paypal.com/cy/webapps/mpp/ua/privacy-full">https://www.paypal.com/cy/webapps/mpp/ua/privacy-full</a>
Payoneer	<a href="https://www.payoneer.com/legal/privacy-policy/">https://www.payoneer.com/legal/privacy-policy/</a> <a href="https://static.qiwi.com/business/qiwi_bank/about/reports/policy_regarding_of_personal_data.pdf">https://static.qiwi.com/business/qiwi_bank/about/reports/policy_regarding_of_personal_data.pdf</a>

1.3.2. We transfer and disclose the Provided Data to the providers of billing and payment services only if they request. If you do not use the providers of billing and payment services on the Platform, we will not share the Provided Data with them.

1.3.3. We do not collect or store your credit card information. You provide this information to our providers of billing and payment services. Use of the Provided data for payment processing is governed by their privacy policy.

### 1.4. Data storage providers

We store data on our secure servers in Russia. The databases are copied to the Amazon Web Services data center (Frankfurt, Germany):

<i>Data storage providers</i>	<i>Who controls</i>	<i>Where to read the personal data processing policy or privacy policy (if available)</i>
<ul style="list-style-type: none"> <li>ITGLOBAL.COM NL</li> </ul>	ITGLOBAL.COM NL292 Herikerbergweg, 1101CT Amsterdam, Netherlands, registration number: KvK: 72889241	

### 1.5. Advertising platforms and applications

The Platforms we use for advertising allow us to optimize and display ads based on the usage data of the Platform, i.e. tracking usage data and cookies.

<i>Advertising platform</i>	<i>Who controls</i>	<i>Purpose for which we use the data</i>	<i>Who and how stores and processes data</i>	<i>Where to read the privacy policy</i>	<i>How to opt out</i>
Google Ads	"Google": 1600 Amphitheater Parkway, Mountain View, Calif, 94043, USA.	(1) to track users' actions after they have been forwarded to our Platform by clicking the Google advertisement; (2) to measure the effectiveness of Google ads for market research and statistical purposes, in particular, to better understand and deliver ads and make them more relevant to you.	Google	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a> <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>	by the instructions on the page <a href="https://policies.google.com/technologies/ads">https://policies.google.com/technologies/ads</a> , under "How to manage advertising cookies."
Facebook Pixel; Facebook SDK	"Facebook": (1) Facebook Inc., 1601 Willow Road, Menlo Park,	(1) to track users' actions after they have been forwarded to our Platform by clicking the	This data is anonymous to us.	<a href="https://www.facebook.com/about/privacy/http">https://www.facebook.com/about/privacy/http</a>	(1) for Facebook Pixel - through your Facebook account settings.



	CA 94025, USA – If you live outside the EU; or (2) Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbor, Dublin 2, Ireland - if you live in the EU	Facebook advertisement; (2) to measure the effectiveness of Facebook ads for market research and statistical purposes, in particular, to better understand and deliver ads and make them more relevant to you	Facebook can link this data to your Facebook account and use it for its own advertising purposes	<a href="https://www.facebook.com/about/privacy/">s://www.facebook.com/about/privacy/</a>	You can do this for the Facebook pixel as well as for cookies; (2) for the Facebook SDK - through your device settings
Yandex.Direct	" <b>Yandex</b> ": Yandex LLC, 16 Lva Tolstogo St., Moscow 119021, Russia. It is represented – (1) for users in the European Economic Area (the " <b>EEA</b> "), or Switzerland by Yandex Oy, Moreenikatu 6, 04600 Mantsala, Finland; (2) users in Israel by Yandex.Go Israel Ltd, 148 Menachem Begin St., Tel Aviv, Israel 6492104	(1) to track users' actions after they have been forwarded to our Platform by clicking the Yandex advertisement; (2) to measure the effectiveness of Yandex.Direct for market research and statistical purposes, in particular, to better understand and deliver ads and make them more relevant to you	Yandex	<a href="https://yandex.ru/legal/confidential/">https://yandex.ru/legal/confidential/</a> <a href="https://yandex.ru/legal/confidential/">https://yandex.ru/legal/confidential/</a>	through your Yandex account settings
STP	" <b>STP</b> ": SmartTel Plus OÜ, registry code: 12891576, Maakri 19/1-7K, 10145, Tallinn	to connect with customers via phone, web, and multi-channel messaging through a single, simple web interface.	STP	<a href="https://dzinga.com/file/manual/privacy_policy_en.pdf">https://dzinga.com/file/manual/privacy_policy_en.pdf</a>	through making a request to us via email (section 15)
Exponea Platform	Bloomreach SK s.r.o., Business ID No. 50 017 560, with its registered office at Staromestská 3, Bratislava - mestská časť Staré Mesto 811 03, Slovak Republic,	to send targeted emails, push notifications, and SMS	Exponea	<a href="https://exponea.com/terms-of-service/data_processing_addendum.pdf">https://exponea.com/terms-of-service/data_processing_addendum.pdf</a>	through making a request to us via email (section 15)
SMS-CENTRE LTD	SMS-CENTRE LTD, number HE343339, address is at 155 Arch. Makariou III Avenue PROTEAS HOUSE, 5th floor, 3026 Limassol	to send targeted emails, push notifications, and SMS	SMS-CENTRE	<a href="https://smscentre.com/files/docs/pers_msk.pdf">https://smscentre.com/files/docs/pers_msk.pdf</a>	through making a request to us via email (section 15)
Apifonica	SMARTTEL PLUS OÜ Maakri str. 19/1-7k, 10145, Tallinn, Estonia	to connect with customers via phone through a single, simple web interface.	Apifonica	<a href="https://www.apifonica.com/public/legal/apifonica_privacy_policy.pdf">https://www.apifonica.com/public/legal/apifonica_privacy_policy.pdf</a>	through making a request to us via email (section 15)
360dialog	360dialog GmbH, Torstraße 61, 10119 Berlin, Germany, Commercial Register: Berlin-Charlottenburg, HRB 144188 B	To send targeted whatsapp messages	360dialog	<a href="https://www.360dialog.com/en/contact#dataprivacy">https://www.360dialog.com/en/contact#dataprivacy</a>	through making a request to us via email (section 15)

Sberbank	121170, Moscow, st. Poklonnaya, 3, PO Box 240	to measure the effectiveness of ads at the Tele2's website for market research and statistical purposes	Sberbank	<a href="https://spasibosberbank.ru/docs/%D0%9F%D0%BE%D0%BB%D0%B8%D1%82%D0%B8%D0%BA%D0%B0_%D0%9F%D0%94%D0%9D.pdf">https://spasibosberbank.ru/docs/%D0%9F%D0%BE%D0%BB%D0%B8%D1%82%D0%B8%D0%BA%D0%B0_%D0%9F%D0%94%D0%9D.pdf</a>	through making a request to us via email (section 15)
Sberbank-Piter	195112, St. Petersburg, Malookhtinsky prospect, d. 64, lit. A.	to measure the effectiveness of ads at the Tele2's website for market research and statistical purposes	Sberbank-Piter	<a href="https://spasibosberbank.ru/docs/%D0%9F%D0%BE%D0%BB%D0%B8%D1%82%D0%B8%D0%BA%D0%B0_%D0%9F%D0%94%D0%9D.pdf">https://spasibosberbank.ru/docs/%D0%9F%D0%BE%D0%BB%D0%B8%D1%82%D0%B8%D0%BA%D0%B0_%D0%9F%D0%94%D0%9D.pdf</a>	through making a request to us via email (section 15)

### 1.6. Marketing and analytical platforms

We transfer and disclose your cookies and usage data for web and mobile analytics purposes, as well as to personalize content on the Platform: for example, to offer you not all of our services, but only those that may interest you.

<i>Provider</i>	<i>Who controls</i>	<i>Purpose for which we use the data</i>	<i>Where to read the privacy policy</i>	<i>How to opt out of transmission and processing of data generated by cookies by a third-party provider</i>
Google Analytics; Firebase	the Google	(1) to track the Website traffic and your behavior at the Platform; (2) analyze, how you use the Platform to improve its performance and manage advertising placements based on your interests and preferences	<a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a> <a href="https://policies.google.com/privacy">https://policies.google.com/privacy</a>	(1) for Google Analytics – by installing the add-on for your browser: <a href="https://tools.google.com/dlpage/gaoptout">https://tools.google.com/dlpage/gaoptout</a> ; (2) for Firebase – through the device settings, such as the device advertising settings for mobile apps
Appsflyer	(1) AppsFlyer Inc., 100 First St. San Francisco, CA, 94105 – if you live in the United States or Canada; (2) AppsFlyer UK LTD, 87-91 Newman St., London, W1T 3EY, United Kingdom – if you live in the UK; (3) AppsFlyer Ltd., 14 Maskit St. Herzliya, Israel – if you live in any other country	(1) to track the mobile traffic to the Website and your behavior at the Platform; (2) analyze, how you use the Platform to improve its performance and manage advertising placements based on your interests and preferences	<a href="https://www.appsflyer.com/privacy-policy/">https://www.appsflyer.com/privacy-policy/</a>	<a href="https://www.appsflyer.com/optout">https://www.appsflyer.com/optout</a>
Yandex.Metrika	the Yandex	(1) to track the Website traffic and your behavior at the Platform;	<a href="https://yandex.com/legal/confidential/">https://yandex.com/legal/confidential/</a> <a href="https://yandex.ru/legal/confidential/">https://yandex.ru/legal/confidential/</a>	by installing the add-on for your browser: <a href="https://yandex.com/support/metrica/general/opt-">https://yandex.com/support/metrica/general/opt-</a>

		(2) analyze, how you use the Platform to improve its performance and manage advertising placements based on your interests and preferences		<a href="https://yandex.com/support/metrica/general/opt-out.html">out.htmlhttps://yandex.com/support/metrica/general/opt-out.html</a>
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### 1.7. Identification providers

We transfer and disclose to Sumsb the data provided by tutors, instructors, and other contractors (including copies of identification documents, such as passports; citizen identification cards; driver's licenses):

<i>Provider</i>	<i>Who controls</i>	<i>Purpose for which we use the data</i>	<i>Where to read the privacy policy</i>
Sumsb	Sum and Substance Ltd, 80 Wood Ln, Central Working White City, London, United Kingdom, W12 0BZ	to verify the identity of the tutors and other contractors	<a href="https://sumsub.com/privacy-and-cookie-policy/">https://sumsub.com/privacy-and-cookie-policy/</a> <a href="https://sumsub.com/privacy-and-cookie-policy/">https://sumsub.com/privacy-and-cookie-policy/</a>

### 1.8. Support software providers

We transfer and disclose the Provided Data (including name, phone number, email address, gender, location and social media profiles) with the following providers in order to provide customer service:

<i>Provider</i>	<i>Who controls</i>	<i>Purpose for which we use the data</i>	<i>Where to read the privacy policy</i>
Qonversion	Qonversion, 1160 Battery St East Suite 100, San Francisco, CA 94111, USA	to track the Website traffic and your behavior at the Platform	<a href="https://documentation.qonversion.io/docs/app-store-privacy">https://documentation.qonversion.io/docs/app-store-privacy</a>
Amplitude	Amplitude, Inc., 201 Third Street, Suite 200, San Francisco, CA 94103	to track the Website traffic and your behavior at the Platform	<a href="https://amplitude.com/privacy">https://amplitude.com/privacy</a>

### 1.9. CRM providers

We transfer and disclose Personal data of users responsible for launching corporate training programs in their companies (such as name, phone number, email, phone records and correspondence) to Pipedrive:

<i>Provider</i>	<i>Who controls</i>	<i>Purpose for which we use the data</i>	<i>Where to read the privacy policy</i>
CREATIO	Terrasoft Distribution Tsentr LLC 115280, Moscow, st. Leninskaya Sloboda, building 26, floor 2, room 1. INN: 7725328680 Company No.: 772501001	to store the blogger database	<a href="https://www.creatio.com/legal">https://www.creatio.com/legal</a>
Google Workspace	Softline International SRL (Romania), registered at Trade Registry with Nr. J40/5641/2010, Romania, Bucharest, 17 Bucuresti-Ploiesti highway, 5th floor, Office 1.	ti access to one or more services for cloud solutions: <a href="https://workspace.google.com/intl/en/terms/user_features.html">https://workspace.google.com/intl/en/terms/user_features.html</a>	<a href="https://policies.google.com/terms?hl=en">https://policies.google.com/terms?hl=en</a>

1.9.1. We provide Personal data of teachers, such as name, email address, passport information, phone number, education, photos and videos of the classes in which they participate:

<i>Provider</i>	<i>Who controls</i>	<i>Purpose for which we use the data</i>	<i>Where to read the privacy policy</i>
Yandex.Connect	Yandex	to manage existing and potential tutors	<a href="https://yandex.com/legal/confidential/">https://yandex.com/legal/confidential/</a> <a href="https://yandex.ru/legal/confidential/">https://yandex.ru/legal/confidential/</a>

#### **1.10. Partners in marketing (advertising) actions (activities)**

Contact and personal information is provided

<i>Provider</i>	<i>Who controls</i>	<i>Purpose for which we use the data</i>	<i>Where to read the privacy policy</i>
OOO Sky Service Rus (Sky Service Rus LLC)	OOO Sky Service Rus (Sky Service Rus LLC)	to provide agency and consulting services; to maintain and use the required IT systems; to manage the quality of the services provided , risks associated with and / or arising from the performance of the Contract; to provide information about the range of services; to set out-of-court and judicial disputes;	