

Personal Data Processing Policy of Agaton Ltd

Version # 3

Revision History

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1. SCOPE OF APPLICATION

1.1. This Policy applies to Agaton Ltd. (hereinafter referred to as the “**Company**”, “**Agaton**”) and determines the procedure for obtaining, processing and protecting any information, including personal data of individuals (hereinafter referred to as the “**Personal Data Subject**”, “**Subject**”), within the meaning of applicable law due to:

1.1.1. business activities carried out in accordance with the statutory documents of the Company, aimed at meeting the needs of other persons (hereinafter referred to as the “**Service**”);

1.1.2. implementation of labour relations;

1.1.3. conclusion and fulfillment of contractual obligations, as well as during the execution of any agreements and contracts related to Personal Data Subjects.

1.2. The Personal Data Processing Policy (hereinafter referred to as the “**Policy**”) is an annex to the Vimbox Privacy Policy and applies to any information including personal data of individuals (hereinafter referred to as “**Personal Information**”).

1.3. An individual who provided his Personal Information to the Company in the process of receiving the Service and using any websites (hereinafter referred to as the “**Site**”), programs, products and/or Internet services (hereinafter referred to as the “**Services**”) owned by Agaton, or is in the process of establishing contractual relations with Agaton, is the **User**.

1.4. The main categories of processed Personal Data Subjects are given in Annex No. 1.

1.5. The Policy applies to:

1.5.1. Agaton’s personnel (Agaton’s personnel means employees working under employment contracts, as well as partners providing services to Agaton under civil contracts) (hereinafter referred to as the “**Personnel**”);

1.5.2. Agaton’s shareholders;

1.5.3. Agaton’s directors;

1.5.4. teachers, students, methodologists, parents of students, potential Users;

1.5.5. Agaton's counterparties, if applicable.

1.6. The requirements of the Policy are taken into account and presented in relation to legal entities:

1.6.1. included in the Skyeng Group (hereinafter referred to as the “**Group Companies**”);

1.6.2. other entities if their participation is necessary in the processing of Personal information (for example, in cases of transfer of data in the prescribed manner by Agaton to the Group Companies and other contractors 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 Annex No. 2 to this Policy.

2. PURPOSES AND LEGAL GROUNDS FOR PROCESSING

2.1. The purposes for processing Personal Information determine its content and volume.

2.2.1. Agaton collects and uses Personal Information for the following purposes: necessity for its legitimate business interests;

2.2.2. concluding an agreement with the Subjects for the use of the Services defined by the Company’s Charter;

2.2.3. ensuring the financial and economic activities of the Company;

2.2.4. compliance with legal obligations;

2.2.5. protecting its legal rights and complying with judicial and/or administrative orders, if necessary.

2.3. Legal grounds for processing personal data

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

Purposes of processing Personal information	Rights and obligations of the Company and the Personal Data Subject
2.3.2. Fulfillment of contractual obligations	<ul style="list-style-type: none"> • provision of paid and free Services to Personal Data Subjects; • exercise and fulfillment of rights and obligations, including for the purpose of performing an agreement to which the Personal Data Subject is a party or beneficiary or guarantor, as well as for concluding an agreement at the initiative of the Personal Data Subject or an agreement under which the Personal Data Subject will be a beneficiary or guarantor; • improving the quality of provided and related Services; • communication with the Subjects if necessary, including for sending notifications, information and requests related to the provision of Services to them, as well as processing statements, applications and other messages received from them. <p>(1) Such notices include:</p> <ul style="list-style-type: none"> • informing about payments, • marketing and advertising notifications (mailings) about Agaton news, products and Services (messages are sent only if the Subject has given consent to receive them). <p>(2) The Subject, at any time and free of charge, has the right to refuse to receive notifications (mailings) and other information using a special procedure for refusing such mailings, if this does not affect the quality of the Services provided.</p>
2.3.3. Fulfillment of statutory requirements and obligations	<ul style="list-style-type: none"> • exercise and performance of functions, powers and obligations assigned to the processor (operator); • execution of a judicial act, act of another body or official subject to execution in accordance with enforcement proceedings; • execution of orders from other personal data operators.
2.3.4. Ensuring legitimate interests	<ul style="list-style-type: none"> • carrying out activities provided for by the Company's statutory documents; • creation of new products and offers; • collection, processing and presentation of statistical data and other research based on anonymized personal data; • carrying out recruiting (selection of Personnel), including for the purpose of providing candidates for filling vacant positions with the opportunity to undergo selection for filling the corresponding vacant positions, employment of those who have successfully passed the selection for filling the corresponding vacant positions; • conclusion, execution and termination of civil contracts; • exercise and fulfillment of rights and obligations arising from labour relations, including for the purpose of assisting employees in finding employment, obtaining education and promotion in positions, ensuring their personal safety, monitoring the quantity and quality of work performed and ensuring the safety of property, payment of wages and other payments due to the employee, in accordance with the law or contract, as well as tax and social contributions; • exercise of rights and legitimate interests as an operator or third parties, including protection against copyright infringement, fraud and other unfair behaviour; • making settlements with Personal Data Subjects.

3. PROCEDURE AND CONDITIONS FOR PROCESSING PERSONAL INFORMATION

Processing of Personal Information means any operation or set of operations that is performed on personal data or sets of personal data, regardless of whether they are used by automated means, such as collection, recording, organization, structuring, storage, adaptation or modification, retrieval, consultation, use, disclosure by transmission, distribution or other provision, alignment or combination, restriction, depersonalization or destruction.

3.1. Collection of information

3.1.1. Personal information is collected directly from the Personal Data Subject. If the provision of the requested information is required by law, the Subject will be advised of the legal consequences of refusing to provide it.

3.1.2. Obtaining Personal information from other persons is possible only if there are legal grounds, as well as with notification of the Subject.

3.1.3. Collection and processing of Personal information that does not correspond to the stated purposes is not permitted.

3.1.4. If the Subject does not want to update Personal Information or wants to refuse to receive newsletters (for example, marketing ones), he can fill out an opt-out form and send it to dpo@skyeng.eu.

3.2. Obtaining the Subject's consent to the processing of Personal Information

3.2.1. The processing of Personal Information is carried out in accordance with the provisions of current legislation and the agreement with the Subject, after receiving explicit and specific consent from him.

3.2.2. Consent can be expressed by the Subject in the form of committing implicit actions, for example:

3.2.2.1. checking boxes, filling out the appropriate fields in forms;

3.2.2.2. maintaining email correspondence regarding processing;

3.2.2.3. entering the Company's office premises after reading the warning signs;

3.2.2.4. other actions performed by the Subject, by which one can judge his will.

3.3. Description of information processed based on consent

3.3.1. In some cases, provided for by legislative and other applicable requirements, consent is formalized in writing or by standard forms.

3.3.2. In cases of processing of Personal Information received not from the Subject directly, but from other persons on the basis of an agreement or order for processing, the obligation to obtain the Subject's consent rests with the person from whom the Personal Information was received.

3.3.3. If the Subject refuses to provide the necessary and sufficient amount of his Personal Information, the Company will not be able to take the necessary actions to achieve the purposes corresponding to the processing (for example, in the case of an incomplete registration procedure of the Subject in the Service, the Service under the agreement may not be provided to him, or the applicant's CV for the vacancy will not be reviewed, etc.).

3.3.4. The Personal Data Subject has the right to withdraw consent to the processing of his Personal Information by sending a corresponding request to Agaton or the authorized representative (DPO) to dpo@skyeng.eu.

3.4. Storage conditions

3.4.1. Agaton, when storing Personal Information, is guided by the Standard Contractual Clauses approved by the European Commission to ensure an adequate level of protection of Personal Information. The list of service providers for storing Personal information is specified in Annex No. 2.

3.4.2. A Subject located in a territory where his consent is required for the transfer of his Personal Information to another jurisdiction provides Agaton with his express and unambiguous consent to such transfer or storage and/or processing of information in other specified jurisdictions.

3.4.3. Agaton, depending on the purposes of processing Personal Information, stores it in the European Economic Area (hereinafter referred to as the **EEA**) and/or in the Russian Federation.

3.4.4. Russia is a jurisdiction outside the EEA which has not been recognized by the European Commission as providing an adequate level of protection for personal data, therefore appropriate measures are taken to ensure that such transfers are carried out in accordance with applicable EU data protection rules.

3.5. Storage periods

3.5.1. Personal information is 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. Longer storage periods may be required or permitted based on legal requirements, contractual or user agreements.

Category	Storage period
3.5.3. Personal Data Subject	84 months after receiving the Service
3.5.4. Contractor processing Personal Information	one month after termination of the contract

3.6. Conditions for destruction or depersonalization

3.6.1. Agaton, upon expiration of the period of storage of Personal information determined by the purposes of its processing, performs the following actions:

3.6.1.1. removes redundant Personal Information; or

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

Conditions for destruction or depersonalization	Storage period	Subject
3.6.2. achieving the purposes of processing Personal information or maximum storage periods	within 30 days	Agaton (manually or automatically)
3.6.3. loss of the need to achieve the purposes of processing Personal Information	within 30 days	
3.6.4. provision by the Personal Data Subject or his legal representative of confirmation that the Personal Information was illegally obtained or is not necessary for the stated purpose of processing	within 7 days	
3.6.5. impossibility of ensuring the legality of processing of Personal information	within 10 days	
3.6.6. withdrawal by the Personal Data Subject of consent to the processing of personal data, if the storage of personal data is no longer required for the purposes of processing personal data	within 30 days	
3.6.7. withdrawal by the Personal Data Subject of consent to the use of Personal Information for contacts with potential consumers when promoting goods and Services	within 2 days	
3.6.8. expiration of the statute of limitations for legal relations within the framework of which the processing of Personal Information is carried out or was carried out		
3.6.9. liquidation (reorganization) of the Company, if the processing was carried out solely in the interests of this entity and there is no legal successor		

4. UPDATE, CORRECTION, DELETION AND DESTRUCTION OF DATA, RESPONSES TO REQUESTS OF SUBJECTS FOR ACCESS TO PERSONAL INFORMATION

4.1. Agaton does not verify Personal Information provided to it, except as stipulated by contractual or user agreements, as well as the terms of use of individual Services, and cannot judge its reliability and does not have sufficient legal capacity to provide Personal Information.

4.2. The accuracy of Personal Information, its sufficiency and relevance in relation to the purposes of processing are ensured if necessary to protect the legitimate interests of Agaton. In this case, if inaccurate or incomplete Personal information is detected, it may be clarified and updated.

Right	What the Subject has the right to do	How to exercise the right	Comment
4.3. to gain access to Personal information	(1) to obtain confirmation of the processing of Personal Information; (2) to gain access to his Personal Information, as well as information about its processing.	please contact DPO	The Company may ask you to verify your identity before responding to a request and, in certain circumstances, may charge a fee to cover our costs. The response period is one month after receipt of the request. If it takes longer to process your request, we will notify you. In any case, we cannot extend the response period by more than two months after the end of the first response month.
4.4. to correct inaccurate data	to require correction of any incomplete or inaccurate data.	please contact DPO	
4.5. to object to processing	to object to the processing of Personal Information if we process it for our own legitimate interests, use it for direct marketing or for statistical purposes.	please contact DPO	
4.6. to require us to make your data portable	to require, under certain circumstances, to be provided with a copy of Personal Information in a structured, commonly used and machine-readable format.	please contact DPO	
4.7. to delete Personal information (in whole or in part)	to require, under certain circumstances, the deletion of Personal Information. For example, if we no longer need it or if the Subject withdraws the consent that served as the basis for data processing.	please contact DPO	
4.8. to withdraw consent to data processing	to withdraw his consent to the processing of Personal Information.	please contact DPO	
4.9. to limit processing	to request to limit or cease the collection, use, processing and/or disclosure of Personal Information.	please contact DPO	
4.10. to be informed of the precautions we take when transferring data to a third country or international organization	ask us about these measures	please contact DPO	
4.11. to file complaints	to complain to the supervisory authority for compliance with legislation on the protection of personal data about our collection and use of Personal Information.	please contact your local supervisory authority	

4.12. The Subject or his legal representative has the right to send a request to provide/update information about the processing of his Personal Information, or to delete it, while the request should not include a requirement to provide/change data relating to other Subjects. The request of the Subject or his representative must contain (at a minimum):

4.12.1. number of the main identification document of the Subject or his legal representative;

4.12.2. information confirming the Subject's participation in relations with Agaton (agreement number, agreement date or other information), or information otherwise confirming the fact of processing of Personal Information;

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 exercise rights if this is permitted or required in accordance with:

4.13.1. Cyprus data protection laws which we must comply with;

4.13.2. legal requirements that must be complied with by the data controller with whom we cooperate.

4.14. Agaton, if the request is rejected, undertakes to provide a response indicating the basis for the rejection.

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

4.16. Ensuring information security

4.16.1. Personal information belongs to the category of confidential information and is subject to protection 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. The Company, when processing Personal Information, takes reasonable and sufficient legal, organizational and technical measures, maintaining a balance between its legitimate interests and protecting the confidentiality of Personal Information.

5. POLICY UPDATE

5.1. Agaton has the right to make amendments at its discretion, including, but not limited to, in cases where the corresponding amendments are related to changes in applicable law.

5.2. This Policy is drawn up in English and Russian. In the event of discrepancies or any inconsistency in the semantic content of the terms of this Policy, the text of this Policy in English shall prevail.

6. PLACEMENT OF POLICY

Unrestricted access to this Policy and Annexes thereto is provided to all interested parties, including Personal Data Subjects and authorities exercising control and supervisory functions in the field of processing of Personal Information.

7. CONTACTS

If you have any questions, comments or requests related to the Policy, please contact our Data Protection Officer at dpo@skyeng.eu.

1. Main categories of processed Personal Data Subjects

1.1. Personal information is collected and processed for the purpose of fulfilling contractual obligations, as well as the legitimate interests of the Company.

Category	Personal Information
1.2. Agaton's shareholders and founders	Information necessary for registration of labour and civil law relations, in particular documents containing the given name, surname, photograph, date of birth and number of the main identification document.
1.3. Individuals who are or have been in labour and civil law relations with Agaton or with legal entities belonging to the Skyeng Group, as well as persons who intend to enter into such relations (for example, candidates for vacant positions)	<p>(1) Information necessary for formalizing labour and civil law relations, in particular, but not limited to: documents containing the given name, surname, photograph, date of birth and number of the main identification document.</p> <p>(2) Agaton has the right to take additional measures to verify the Personal Information provided by the Subject.</p> <p>(3) When formalizing labour and civil law relations, Personal Information about immediate relatives and/or recommenders may be collected.</p>
1.4. Individuals indicated in publicly available and other sources that are obtained legally and are used in the provision of Agaton Services as data sources	Personal Information specified in publicly available and other sources, such as: name, contact information (for example: phone number and/or email), as well as other information necessary for the provision of Services (for example: address, age, etc.)
1.5. Users, including minors	a copy of identification document and bank account details (upon request); full name; email address; phone number; links to the User's Google account; accounts on facebook.com, vk.com, ok.ru; accounts in messengers: WhatsApp, Viber, Telegram, Skype; whether you open our emails and click on links in them; current location; gender; date of birth; photographs, video and audio recordings of lessons; level of English (beginner and further); purpose of training; hobbies and interests; sphere of professional activity; information about participation in lessons; recordings of telephone conversations. For minors - in addition to the information listed in the current paragraph: information about the User's family members; information about the school where the User studies; the subject he is interested in (English or mathematics lessons); additional courses, classes, etc. (for example, tutors)
1.6. Potential User (you register on the Platform, but do not purchase lessons)	full name; gender; email address; phone number; current location; date of birth; level of English; purpose of training; hobbies and interests; sphere of professional activity; whether the User opens our emails and clicks on the links in them; information about participation in lessons; language; address (city and region/territory); recordings of telephone conversations
1.7. User responsible for running a corporate program in a company	full name; email address; phone number; current location; recordings of telephone conversations; correspondence
1.8. Teacher	a copy of identification document; photograph; gender; date of birth; photographs, video and audio recordings of lessons; current location; information about education; certificates of passed exams; CV; recordings of telephone conversations
1.9. Methodologist or other contractor	a copy of identification document; current location; photograph; gender; date of birth; recordings of telephone conversations

1.10. Parents of minor Users	date of birth; gender; current location; recordings of telephone conversations
1.11. Individuals who contacted Agaton with requests, messages, statements, complaints, offers using contact information or feedback collection tools	<p>Information confirming the author of the request, in particular, but not limited to: documents containing the given name, surname, date of birth and number of the main identification document of the applicant or of his representative.</p> <p>Agaton has the right to take additional measures to verify the Personal Information provided by the Subject.</p>
1.12. Individuals participating in interviews, surveys, analytical and marketing research on the subject of Agaton's activities	Personal information necessary for interaction, such as: name, contact information (for example: phone number and/or email).
1.13. Visitors to Agaton's office sites	Personal information necessary for interaction, such as: name, contact information (for example: phone number and/or email).

1. Terms of information disclosure

1.1. Competent authorities

1.1.1. Upon request, as well as in cases provided for by this Policy or applicable law, and only to the extent necessary based on the purpose of disclosure.

1.1.2. To resolve any conflict or dispute arising between the Subjects and the Company.

1.2. Information Processors (Partners)

1.2.1. Agaton may receive Personal Information from its Partners (hereinafter referred to as “Partners”) and/or affiliates, including those in the same group with Agaton (hereinafter referred to as “Skyeng”), when using websites, programs, products or Internet services. In such cases, the transfer of Personal Information is carried out in accordance with applicable law and on the basis of special agreements between Agaton and each of the Partners.

Jurisdiction	Legal entities included in the Skyeng Group
1.2.2. European Economic Area (EEA)	Vimbox Ltd (Republic of Cyprus) Langroom Ltd (Republic of Cyprus) Brandeston Ltd (Republic of Cyprus) Skaeng Technology S.l.u. (Spain) Skymath Ltd (USA) Sky Language Technology Hong Kong Ltd
1.2.3. Russian Federation	Sky Service Rus LLC Educational Technologies LLC EDUCATIONAL AUTONOMOUS NON-PROFIT ORGANIZATION OF ADDITIONAL PROFESSIONAL EDUCATION “SKYENG” SKYENG LLC Language Innovations LLC

1.2.4. Legal entities included in the Skyeng Group may act as entities processing Personal Information on the basis of contracts and other agreements. Such cases include, for example, the following:

1.2.4.1. providing customers with rights to use software products;

1.2.4.2. providing customers with Services related to data processing;

1.2.4.3. carrying out joint processing with third-party organizations within the framework of a partnership.

1.3. Payment systems and services

1.3.1. We share and disclose personal data, including identification document number and/or date of issue, copies of identification documents (such as passports), with the following billing and payment service providers:

Payment system or service	Where to find the personal data processing policy or privacy policy (if any)
ECOMPANY	https://ecommpay.com/privacy-policy/
Bank 131	https://131.ru/static/personal_data_processing_policy-b1c2dc8f6f111ade759d9493a882227c.pdf
Contact pay	https://res.cloudinary.com/dai9sjvdh/image/upload/v1687451960/Privacy_and_Cookies_Policy_Contact_Pay_835361f93d.pdf

Platio	https://platio.com/compliance-policy
Tinkoff	https://www.tinkoff.ru/secure/

1.3.2. We share and disclose the Submitted Data to Billing and Payment Service Providers only if they request it. If you do not use Billing and Payment Service Providers on the Platform, we will not share your Submitted Data with them.

1.3.3. We do not collect or store your bankcard details. You provide this information to our Billing and Payment Service Providers. How they use the Submitted Data to process payments is subject to their privacy policies.

1.4. Data storage providers

We store data on our secure servers in Russia. Databases are copied to the Amazon Web Services data processing centre (Frankfurt, Germany):

Data storage providers	Who controls	Where to find the personal data processing policy or privacy policy (if any)
● Amazon Web Services EMEA SARL	Amazon Web Services EMEA SARL, 38 Avenue John F. Kennedy, L-1855, Luxembourg	https://aws.amazon.com/privacy/
● DigitalOcean, LLC	DigitalOcean, LLC, 101 6th Ave New York, NY 10013	https://www.digitalocean.com/legal/privacy-policy
● United Asia Exports FZE	United Asia Exports FZE, Al Shmookh Building Business Center, Umm Al Quwain, United Arab Emirates	

1.5. Advertising platforms and applications

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

Advertising platform	Who controls	Purpose for which we use it	Who stores and processes data and how	Where to find the privacy policy	How you can opt out
Google Ads	“Google”: 1600 Amphitheater Parkway, Mountain View, California, 94043, USA	(1) tracking your actions after you have been redirected to our Platform by clicking on an advertising link on Google; (2) measuring the effectiveness of Google ads for the purpose of market research and statistics, in particular for better understanding and display of ads and to make them more relevant to you	Google	https://policies.google.com/privacy	by following the instructions at https://policies.google.com/technologies/ads , in the “How to manage advertising cookies” section
Facebook Pixel;	“Facebook”: (1) Facebook	(1) to track your activities after you	These data are anonymous to	https://www.facebook.com/abo	(1) for Facebook Pixel - through

Facebook SDK	Inc., 1601 Willow Road, Menlo Park, California 94025, USA – for non-EU residents; or (2) Facebook Ireland Ltd., 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland - for EU residents	have been redirected to our Platform by clicking on a Facebook ad; (2) to measure the effectiveness of Facebook advertising for market research and statistical purposes, in particular for better understanding and display of ads and to make them more relevant to you	us. Facebook may associate these data with your Facebook account and use them for its own advertising purposes.	ut/privacy/	your Facebook account settings. You can do this for both Facebook Pixel and cookies; (2) for Facebook SDK - through your device settings
Yandex.Direct	“Yandex”: LLC “Yandex”, 119021, Russia, Moscow, Lev Tolstoy St., 16 – represented (1) for Users from the European Economic Area (EEA) or Switzerland by Yandex Oy, Morenikatu 6, 04600 Mantzala, Finland; (2) for Users from Israel by Yandex.Go Israel Ltd, Menachem Begin St., 148, Tel Aviv, Israel, 6492104	(1) to track the activities of Users after they have been redirected to our Platform by clicking on a Yandex ad; (2) to measure the effectiveness of Yandex.Direct for market research and statistical purposes, in particular for better understanding and display of ads and to make them more relevant to you	Yandex	https://yandex.ru/legal/confidential/	through your Yandex account settings
STP	“STP”: SmartTel Plus OÜ, registration code 12891576, Maakri 19/1-7K, 10145, Tallinn	to communicate with customers by phone, online, and multi-channel messaging through a single simple web interface.	STP	https://dzinga.com/file/manual/privacy_policy_en.pdf	by sending us a request by email (section 15)
SMS-CENTRE LTD	SMS-CENTRE LTD, number HE343339 with location at 155 Arch. Makariou III Avenue PROTEAS HOUSE, 5th floor, 3026 Limassol	to send targeted emails, push notifications and SMS	SMS-CENTRE	https://smscentre.com/files/docs/pers_msk.pdf	by sending us a request by email (section 15)

Apifonica	SMARTTEL PLUS OÜ, Maakri 19/1-7K, 10145, Tallinn	to communicate with customers by phone through a single simple web interface	Apifonica	https://www.apifonica.com/public/legal/apifonica_privacy_policy.pdf	by sending us a request by email (section 15)
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1.6. Marketing and analytics Platforms

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

Provider	Who controls	Purpose for which we use it	Where to find the provider's privacy policy	How to opt out of transmission and processing of data generated by cookies by a third party
Google Analytics; Firebase	the Google	(1) to track website traffic and your behaviour on the Platform; (2) to analyse how you use the Platform to improve its performance and manage advertising based on your interests and preferences	https://policies.google.com/privacy	(1) for Google Analytics - by installing the add-on for your browser: https://tools.google.com/dlpage/gaoptout ; (2) for Firebase - through device settings, such as device advertising settings for mobile applications
Appsflyer	(1) AppsFlyer Inc., 100 First San Francisco, California 94105 - if you live in the United States or Canada; (2) AppsFlyer UK LTD, 87-91 Newman Street, London, W1T 3EY, UK – if you live in the UK; (3) AppsFlyer Ltd., 14, Maskit Street, Herzliya, Israel - if you live in another country	(1) to track mobile traffic to the website and your behaviour on the Platform; (2) to analyse how you use the Platform to improve its performance and manage advertising based on your interests and preferences	https://www.appsflyer.com/privacy-policy/	https://www.appsflyer.com/optout

1.7. Support software providers

For the purpose of providing customer service, we share and disclose Submitted Data (including given name, surname, phone number, email address, gender, location and social media profiles) with the following providers:

Provider	Who controls	Purpose for which we use it	Where to find the privacy policy
Qonversion	Qonversion, 1160 Battery St East Suite 100, San Francisco, CA 94111, USA	to track website traffic and your behaviour on the Platform	https://documentation.qonversion.io/docs/app-store-privacy

1.8. CRM providers

We share and disclose the personal data of Users responsible for running corporate training programs in their companies (such as name, phone number, email, recordings of telephone conversations and correspondence) to Pipedrive:

Provider	Who controls	Purpose for which we use it	Where to find the privacy policy
Google Workspace	Softline International SRL (Romania), registered in the Trade Register with No. J40/5641/2010, Romania, Bucharest, 17 Bucuresti-Ploiesti Highway, 5th floor, office 1	access to one or more services for cloud solutions: https://workspace.google.com/intl/en/terms/user_features.html	https://policies.google.com/terms?hl=en

1.9.1. We provide personal data of teachers, such as full name, email address, passport details, phone number, education, photographs and video recordings of lessons in which they participate:

Provider	Who controls	Purpose for which we use it	Where to find the privacy policy
Yandex.Connect	Yandex	to manage existing and potential teachers	https://yandex.com/legal/confidential/

1.9. Partners for marketing (advertising) campaigns (activities)

Contact and personal information is provided

Provider	Who controls	Purpose for which we use it	Where to find the privacy policy
Sky Service Rus LLC	Sky Service Rus LLC	<p>to provide agency and consulting services;</p> <p>to maintain and use the necessary IT systems;</p> <p>to manage the quality of services provided, risks associated with and/or arising from the execution of the Agreement;</p> <p>to provide information about the range of services provided;</p> <p>to settle out-of-court and judicial disputes</p>	