

# Privacy Policy

## Version 1

### 1. General Provisions

Individual Entrepreneur Alexandr Andreevich Shinkarev, Taxpayer Identification Number (INN) 745216172990, address 454085, Chelyabinsk, Marchenko Street, Building 11D, Apt. 50 (hereinafter referred to as the “**Operator**”, the “**Company**”, “**We**”) processes and protects the personal data of users (hereinafter referred to as the “**User**”, the “**Personal Data Subject**”, “**You**”) of the website <https://www.tourmalinecore.com> (hereinafter referred to as the “**Website**”) and its services.

This Privacy Policy is intended to inform Users about the procedure for processing and protecting personal data when using the Website (<https://www.tourmalinecore.com>) and constitutes the Operator's policy regarding the processing of personal data.

Relations related to the processing of personal data of users located in the Russian Federation are governed by Federal Law of the Russian Federation [No. 152-FZ “On Personal Data”](#) dated July 27, 2006.

If the User is located in the European Union, personal data is processed in accordance with EU [2016/679 General Data Protection Regulation](#) (GDPR) and EU [2002/58/EC Directive on privacy and electronic communications](#) (ePrivacy Directive).

### 2. Definitions

**Website** – the website <https://www.tourmalinecore.com> and its subdomains.

**Personal Data** – any information relating directly or indirectly to an identified or identifiable natural person (the Personal Data Subject).

**Processing of Personal Data** – any action or set of actions performed on personal data, including collection, recording, systematization, accumulation, storage, clarification, updating and modification, retrieval, use, provision, access, blocking,

deletion, and destruction — both with and without the use of automated data processing tools.

**User** – any visitor to the Website.

**Personal Data Operator (Operator)** – a state authority, municipal authority, legal entity, or individual who independently or jointly with others organizes and/or carries out the processing of personal data, as well as determines the purposes of processing personal data, the scope of personal data to be processed, and the actions (operations) performed on personal data.

The Company is the Operator with respect to personal data that we may receive in connection with your use of the <https://www.tourmalinecore.com> website.

### 3. Provision of Personal Data

We receive your personal data:

- When visiting the Website, you consent to the processing of your data using the Yandex.Metrica service by clicking the "Accept all" button in the banner or by selecting data categories via the "Settings" button and confirming your selection with the "Apply settings" button. You can change or revoke your consent at any time using the link at the bottom of the page;
- When sending a request to discuss potential projects via the feedback form, check the box to indicate that you consent to the processing of personal data and agree to the Privacy Policy.

We process only general categories of personal data. We do not process biometric personal data or special categories of personal data. The Website is not intended for minors (individuals under the age of 18). If a minor's data was provided without the required consent of a legal representative, it will be deleted upon discovery or upon request to [contact@tourmalinecore.com](mailto:contact@tourmalinecore.com).

If you have a reason to believe that special categories of personal data have been provided to us through the Website, please inform us by emailing [contact@tourmalinecore.com](mailto:contact@tourmalinecore.com).

You have the right to:

- receive information about the processing of your personal data;

- request clarification, blocking, or deletion of personal data if it is incomplete, outdated, inaccurate, illegally obtained, or is not necessary for the stated purpose of processing;
- revoke consent to the processing of personal data;
- appeal the actions or inaction of the Operator to Roskomnadzor or in court.

For users in the European Economic Area (EEA), the rights provided by the GDPR also apply: regarding the restriction of processing and transferring of data, objection to processing, and registering a complaint with an EEA supervisory authority.

To exercise these rights, please contact us at [contact@tourmalinecore.com](mailto:contact@tourmalinecore.com). The Operator will respond to your request within the timeframes established by Federal Law No. 152-FZ (from 10 to 30 business days, depending on the nature of the request). This timeframe may be extended upon written notice.

## 4. Purposes of Personal Data Processing

We process your personal data for the following purposes:

1. **Purpose:** Analytics of traffic and user behavior.

**Legal basis:** Consent of the data subject.

**Description of purpose:** Collection and analysis of data on user interaction with the Website in order to assess content popularity, identify technical issues, and improve user experience.

### **Categories of personal data processed:**

- Viewed page URL, page title, referrer (traffic source);
- Technical parameters of the device and browser: browser type and version, operating system, screen resolution, interface language, time zone;
- Geolocation data: country and city of the user determined based on IP address;
- Behavioral data: clicks on page elements, scrolling, time spent on page, navigation between internal and external links;
- Unique visit and user identifiers assigned by Yandex.Metrica;
- Demographic data (only if the user is authorized in Yandex services and has given their consent): gender, age group, long-term interests;

- When using the Webvisor feature: recordings of user actions on the page (mouse movements, scrolling, text input in form fields), excluding sensitive fields, which are masked automatically or by Operator settings.

**Categories of data subjects:** Users of the Website navigating its pages.

**Methods of processing and storage:** Automated collection via the Yandex.Metrica tracking code embedded on the Website pages; data is transmitted to the servers of Yandex LLC via secure communication channels (HTTPS).

**Retention periods:** Processing is carried out from the moment the User's consent is received until it is revoked. After consent is revoked, the Operator stops transferring data to Yandex.Metrica and initiates the deletion of local identifiers. Data collected via Yandex.Metrica is stored on the servers of Yandex LLC in accordance with Yandex's Privacy Policy.

**Data deletion procedure:** Upon expiration of the retention period, data is automatically deleted from analytics systems. In case of withdrawal of consent, the Operator stops transferring new data to Yandex.Metrica and initiates deletion of local identifiers (cookies, localStorage) in the user's browser within the timeframes established by law.

**Third-party data sharing:** Yandex LLC acts as a processor of personal data on behalf of the Operator based on the terms of use of the Yandex.Metrica service. Data is processed on the servers of Yandex LLC (7 Sadovnicheskaya St., Bldg. 1, Moscow, 115035, Russia) in accordance with [Yandex's Privacy Policy](#). Access to personal data is also granted to authorized employees of the Operator who require such data to perform their job duties and achieve the purposes of processing. The Operator does not transfer personal data to third parties, except as required by Russian law or where such transfer is necessary to achieve the purposes of processing and is carried out under agreements ensuring adequate data protection.

**The rights of the subject** are exercised in the manner described in Section 3 of this Policy. Consent to Yandex.Metrica's data processing can be revoked through the user data settings in the Website footer: disable the "Analytics" and "Session Recording (Webvisor)" switches and click "Apply Settings."

2. **Purpose:** Responding to the User's request.

**Legal basis:** Consent of the data subject.

**Description of purpose:** Collection of data to communicate with a client, job applicant, or other individual who submitted a request via the feedback form, for the purpose of responding to such request.

**Categories of personal data processed:**

- Name;
- Email address;
- Other personal data voluntarily provided by the User in the message.

**Categories of data subjects:** Visitors of the Website who submit requests via the feedback form.

**Methods of processing and storage:** Personal data submitted via the Website form is sent to the Operator's corporate email address [contact@tourmalinecore.com](mailto:contact@tourmalinecore.com) and is used exclusively to process the request and provide a response. Personal data is stored electronically on the servers of the Mail.ru service used by the Operator, in compliance with Russian data protection legislation.

**Retention periods:** Personal data is processed and stored no longer than is necessary to achieve the purpose of processing, namely, until the end of communication with the User on the relevant request, or until the User revokes consent, whichever occurs earlier.

**Data deletion procedure:** Personal data is deleted upon achievement of the processing purposes or withdrawal of consent. Deletion is carried out by removing the relevant data from the corporate email system without the possibility of recovery. Deletion means that the data cannot be restored in the Operator's information systems.

**Third-party data sharing:** Access to personal data is granted only to authorized employees of the Operator who require such data to perform their job duties and achieve the purposes of processing. The Operator does not transfer personal data to third parties, except as required by Russian law or where such transfer is necessary to achieve the purposes of processing and is carried out under agreements ensuring adequate data protection.

**The rights of the subject** are exercised in the manner described in Section 3 of this Policy.

3. **Purpose:** Protecting the Website from automated requests (bots).

**Legal basis:** The Operator's legitimate interest in ensuring the Website's information security (Clause 7, Part 1, Article 6 of Federal Law No. 152-FZ; for users in the EEA, Article 6(1)(f) of the GDPR).

**Description of purpose:** Distinguishing human user requests from bot requests when interacting with the Website, including when submitting a feedback form; preventing spam and automated attacks.

**Categories of personal data processed:** IP address, device and browser technical parameters (digital fingerprint, browser features), time zone, referrer, Yandex SmartCaptcha session token.

**Categories of data subjects:** Website visitors.

**Methods of processing and storage:** Automated collection by the Yandex SmartCaptcha service; transmission to Yandex.Cloud LLC servers via secure channels (HTTPS).

**Retention periods:** 60 days from the date of collection on Yandex.Cloud LLC servers, after which the data is deleted.

**Data deletion procedure:** Automatic deletion by Yandex.Cloud LLC upon expiration of the storage period.

**Third-party data sharing:** Yandex.Cloud LLC is the processor on behalf of the Operator. See the Terms of Processing here: [https://yandex.ru/legal/smartcaptcha\\_notice/](https://yandex.ru/legal/smartcaptcha_notice/).

**The rights of the subject** are exercised in the manner described in Section 3 of this Policy.

## 5. Data Processing Period

Processing of your personal data is terminated in the following cases:

- achievement of the purposes of processing or loss of the need to achieve them;
- withdrawal of consent (if there are no other legal grounds for processing provided by law);
- identification of unlawful processing, if it is impossible to ensure its legality;
- liquidation of the Company.



After the expiration of the specified periods, personal data shall be deleted or anonymized. If consent is revoked, personal data is destroyed within 30 days of receipt of the revocation, unless there are other legal grounds for processing.

## 6. What Constitutes User Consent

User consent is:

- clicking the "Accept all" button in the banner about data collection using Yandex.Metrica or selecting data categories via the "Settings" button and then confirming with the "Apply settings" button;
- filling out a form on the Website and subsequently confirming that you have legal capacity, act freely, agree with the Website's Privacy Policy and consent to the processing of your personal data, followed by clicking the "Send" button.

Processing of your personal data is carried out on the Website for the purposes specified in Section 4 of this document.

Withdrawal of consent to the processing of personal data is carried out by sending a notification to [contact@tourmalinecore.com](mailto:contact@tourmalinecore.com).

## 7. Third Party Data Sharing

We have the right to share your personal data with third parties solely to achieve the purposes specified in Section 4 of this Policy:

- YANDEX LLC for data processing through the Yandex.Metrica service;
- VK LLC for storing correspondence with Users in the Operator's corporate email account;
- Yandex.Cloud LLC to protect the Website from automated requests using the Yandex SmartCaptcha service;
- authorized government agencies based on legal requirements.

The operator does not transfer personal data across borders. Personal data, including data of foreign Website users, is collected and processed within the Russian Federation.

## 8. Data Security

The Operator implements necessary legal, organizational, and technical measures to protect personal data against unlawful or accidental access, destruction, modification,



blocking, copying, dissemination, as well as other unlawful actions. These measures include identifying security threats to personal data, restricting and controlling access to personal data, training personnel with access to personal data, adopting internal data protection policies and procedures, performing data backup and recovery, using certified information security tools, using the Yandex SmartCaptcha service to protect the Website from bots, and regularly assessing the effectiveness of implemented security measures.

For users from the Russian Federation: The Operator records, systematizes, accumulates, stores, clarifies (updates, changes), and extracts personal data of citizens of the Russian Federation, including primary collection, exclusively using databases located on the territory of the Russian Federation.

For users from the EEA: The Russian Federation is a jurisdiction outside the European Economic Area that has not been recognized by the European Commission as providing an adequate level of protection for personal data. Therefore, the Operator has implemented the necessary organizational and technical measures described in the first paragraph of this section to ensure the protection of personal data. Such security measures are applied taking into account the nature, scope, and purposes of processing, as well as the risks to the rights and freedoms of data subjects.

In the event of personal data breach, the Operator will notify the authorized government agency within the timeframes established by law and will take all necessary measures to protect the data and eliminate the consequences.

## **9. Policy Changes**

We reserve the right to amend this Privacy Policy at any time.

If you have previously provided your consent to the collection of data via the Yandex.Metrica service, you will be presented with an updated consent banner upon any changes to this Policy. Data collection will resume only after you provide your consent to the processing of personal data in accordance with the updated Policy.

## **10. Contacts**

For questions related to personal data, you may contact us at [contact@tourmalinecore.com](mailto:contact@tourmalinecore.com).

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