

Privacy Policy

Privacy Policy

This Personal Data Processing Policy (hereinafter referred to as the "Policy") is compiled by the Service Administration in accordance with the provisions and requirements of the current legislation of the Russian Federation, in particular in accordance with Federal Law 152-FZ, dated July 27, 2006 "On Personal Data", and is aimed at determining the conditions for obtaining (collecting) Personal Data of Users of the Service, their use and other conditions for processing Personal Data of Users. This Policy is a legally binding document for Users using the Service in accordance with its main purpose. Each User undertakes to familiarize themselves with this Policy before starting to use the Service.

Acceptance of this Policy is carried out by the User performing conclusive (actual) actions indicating that they have read and accepted the Policy, namely by checking the box (marking) of consent and acceptance of this Policy in a special section (special form) of the Service when registering a User or when a User completes a Transaction, which indicates the intention, expression of will, desire and consent of the User to comply with and fulfill this Policy.

Acceptance of the Policy means familiarization, understanding of all together and each separately of the terms of the Policy, full, unconditional and unreserved acceptance by the User of its provisions and requirements, as well as the assumption of the obligation to strictly comply with all the rules defined in the Policy.

The Service Administration and the User are hereinafter collectively referred to as the "Parties" and individually as the "Party".

1. Terms Used in the Policy

1.1. For the purposes of this Policy, the following terms are used in the following meaning:

1.1.1. The "SOULGAME" Service or Service a set of information technology solutions located on the Internet at: providing the possibility of direct interaction and organization of the conclusion and execution of the Transaction between the Seller and the Buyer, as well as the implementation of secure settlements between them.

1.1.2. Service Administration - LLC "IT Invest", Kyrgyz Republic, Bishkek city, Pervomaisky district, Chyngyz Aitmatov Ave., 16, apt. 68. INN in the Kyrgyz Republic: 02405202310226, INN in Russia: 9909706696 represented by its authorized representative (moderator), who has the rights to use, manage and dispose of the Service. The Service Administration is the operator of personal data processing within the meaning established by Federal Law 152-FZ, dated July 27, 2006 "On personal data".

1.1.3. User – a person who accesses the Service in order to receive services from the Service Administration, in particular the Seller or the Buyer.

1.1.4. Personal Data – any information relating to an identified or identifiable natural person

1.1.5. Processing of Personal Data any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination,

restriction, erasure or destruction

The Policy may use terms not defined in clause 1.1. of this Policy. In these cases, the interpretation of terms is carried out in accordance with other legal documentation posted on the Service, as well as in accordance with the text and meaning of this Policy

In the absence of an unambiguous interpretation of the term in the text of the Policy and the Public Offer, one should be guided, firstly, by the interpretation of terms used on the Service, including in other legal documentation posted on the Service; secondly, the legislation of the Russian Federation and the customs of business practice in the relevant field of activity.

2. Purpose of the policy. Purpose, methods and legal grounds for the processing of personal data

2.1. This Policy aims to ensure the proper protection of Users' Personal Data from unauthorized access by third parties, to determine the procedure for obtaining, providing and using Users' Personal Data.

2.2. Purposes of Processing User's Personal Data:

fulfillment by the Service Administration of its obligations to the User, provided for by the Agency Agreement.

organization of the conclusion of Transactions between Users (Sellers and Buyers)

organization of settlements between Users (Sellers and Buyers)

providing the User with the opportunity to use the Service in accordance with its functionality and purpose

forming statistics on the use of the Service anonymously and in an aggregated form for the effective service of Users and ensuring the best performance of the Service, ensuring user preferences, combating fraud, analyzing work.

2.3. The Service Administration sets as its most important goal and condition for the implementation of its activities the observance of human and civil rights and freedoms in the Processing of Personal Data, including the protection of the rights to privacy, personal and family secrets.

2.4. Personal data is processed by the Service Administration in the ways listed in clause 1.1.5. Privacy Policy in accordance with the purposes established by this section of the Policy.

2.5. The legal basis for the Processing of Users' Personal Data is:

personal consent to the Processing of Personal Data, provided by the User by Accepting this Policy.

3. User Personal Data

3.1. The Service Administration performs and/or may perform processing of the following Personal Data of Users (composition of Personal Data):

Email;

Phone number.

The purposes of processing such Personal Data (information) are specified in clause 2.2. of this Policy.

3.2. Personal data specified in clause 3.1. of the policy are processed automatically (on a computer, server).

3.3. When a User uses the Service, the Service Administration also automatically receives

information from software, technical and hardware services (software, etc.) used by the User when viewing the web pages of the Service, including, but not limited to, the following:

information about software and hardware that is used by the User when visiting the Service, including the model and version of the operating system, unique device identifiers, as well as data about the User's mobile network;

information recorded in server logs, in particular information about the User's search queries, cookie files, IP address, system failures, cookie data, data about the User viewing certain web pages of the Service;

information about the territorial location of the User, provided via the Internet, etc.;

information about the domain (subdomain) of the User's provider, the country of their location, etc.

The purpose of Processing such Personal Data (information) is to generate statistics on the use of the Service anonymously and in aggregate form for the effective service of the User and ensuring the best performance of the Service, ensuring user preferences, combating fraud, and work analysis.

3.4. The placement of Personal Data on the Service, their provision to the Service Administration by the User, is aimed at fulfilling mutual obligations between the Service Administration and Users under the agreements specified in clauses 2.2. and 2.5. of the Privacy Policy.

3.5. The use of Personal Data about the User is carried out in accordance with the purposes defined in sections 2 and 3 of this Policy, and is unacceptable for any purposes other than those corresponding to the subject matter of the Service.

3.6. The Service Administration undertakes not to provide any Personal Data about Users to private individuals and organizations claiming possible misuse of such information (sending unsolicited advertising, spam, providing information to other persons, etc.).

3.7. The Service Administration processes only those Personal Data of users that were posted on the Service, provided by the User. Users' Personal Data is processed using software, hardware and technical means of the Service, as well as manually.

4. Notifications and Assurances

4.1. The User hereby acknowledges and agrees that the placement of Personal Data on the Service, as well as their transfer to the Service Administration is carried out independently, voluntarily and at their own discretion. By posting their Personal Data on the Service, the User confirms that they do it voluntarily, and also that they voluntarily provide it to the Service Administration for Processing.

4.2. The User hereby consents to the Processing of their Personal Data in accordance with the provisions of the current legislation of the Russian Federation. The Service Administration has the right to use the User's Personal Data in order to fulfill its obligations to the User, including those specified in Section 2 of this Policy, in accordance with the conditions of the current legislation on Personal Data.

4.3. The User hereby consents to receive from the Service Administration various SMS mailings, e-mail messages and other forms of sending/receiving information, including advertising content.

4.4. Due to the nature of the service, the Service Administration cannot verify the accuracy of the information provided or received from Users, and does not control the legal capacity of Users. It is presumed and the Service Administration assumes that the User in all cases, without exception, provides complete and reliable information about themselves and keeps this information up to date.

4.5. The Service Administration undertakes not to post on the Service the Personal Data of other persons, and also not to use the Personal Data of other Users in any way that does not comply with

the requirements of the legislation of the Russian Federation, for illegal or unlawful purposes, for the purpose of extracting profit and any other purposes that do not correspond to the purposes of the Service.

5. Transfer of User Information

5.1. The Service Administration is not entitled, with the exception of the cases specified in clause 5.2. of this Policy, without the consent of the User to transfer Personal Data about the User to third parties, both on a paid and free of charge basis.

5.2. The Service Administration has the right, without the consent of the User and without their prior notice, to transfer information about the User in the following cases, if this is permissible or the Service Administration has such an obligation:

to state bodies, in particular law enforcement agencies, inquiry and investigation bodies, courts at their reasoned request;

on the basis of a court order to third parties;

in other cases provided for by applicable law.

6. Measures to protect user information

6.1. The Service Administration takes technical and organizational and legal measures to ensure the protection of the User's Personal Data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions.

6.2. Such measures include:

6.2.1. Publication of this Personal Data Processing Policy on the Service

6.2.2. Appointment of a person responsible for organizing the Processing of Users' Personal Data. Such person is the General Director of the Service Administration.

6.2.3. Continuous assessment and control of the risk and harm that may be caused to the User in the event of violation of the legislation on Personal Data.

6.2.4. Providing access to Personal Data only to those employees of the Service Administration who really need it to perform their duties and taking into account the purposes of Personal Data Processing.

6.2.5. Implementation of recording, systematization, accumulation, storage, clarification (updating, changing), retrieval and other methods of Personal Data Processing using databases located in the territory of the Russian Federation.

6.2.6. For all purposes of Personal Data Processing, the period of Personal Data Processing (the period of storage of Personal Data) is 3 years from the date of the last activity on the Service. The user can at any time withdraw their consent to the Processing of Personal Data by sending a notification to the Service Administration by e-mail to the e-mail address of the Service Administration support@ggsel.net marked "Withdrawal of consent to the Processing of Personal Data."

Personal data is destroyed by deleting it from the servers of the Service Administration.

6.3. In the event of cross-border transfer of Personal Data, the User hereby consents to such transfer by the Service Administration. At the same time, the Service Administration is obliged, before the commencement of the cross-border transfer of personal data, to make sure that the foreign state to whose territory it is planned to transfer Personal Data ensures reliable protection of the rights of subjects of Personal Data. Cross-border transfer of personal data to the territories of foreign states that do not meet the above requirements may be carried out only with the written consent of the subject of personal data to the cross-border transfer of his personal data and/or the execution of an

agreement to which the subject of personal data is a party.

7. Dispute Resolution Procedure

7.1. The Service Administration and the User hereby establish a pre-trial claim procedure for settling disagreements and disputes arising from the application of this Policy. The deadline for responding to a claim is 7 (seven) business days from the date of its receipt.

7.2. If no agreement is reached on disputed issues, the dispute arising from this Policy shall be considered in court in accordance with the current legislation of the Russian Federation.

8. User Requests

8.1. Users have the right to send their requests to the Service Administration, including requests regarding the use of their Personal Data, as well as to receive information that must be provided by the Service Administration at the request of the User in accordance with the legislation on Personal Data, to the email address of the Service Administration.

8.2. The Service Administration undertakes to consider and send a response to the User's request within 10 days from the date of receipt of the request.

8.3. All correspondence received by the Service Administration from Users (requests in written or electronic form) refers to information of limited access and is not disclosed without the written consent of the User. Personal data and other information about the User who sent the request cannot be used without the special consent of the User, except to respond to the topic of the request received or in cases expressly provided for by the legislation of the Russian Federation.

9. Policy Validity

9.1. This Policy shall enter into force from the moment of its posting on the Internet on the Service specified in clause 1.1.1. of this Policy.

9.2. This Policy is enacted for an indefinite period and becomes invalid upon its cancellation by the Service Administration.

9.3. In the event of changes to the Policy, such changes shall take effect from the moment of publication of the new version of the Policy on the Service, unless a different effective date for the changes is specified additionally upon its publication. The Service Administration has the right to unilaterally make changes to the text of the Policy.

9.4. The User undertakes to independently monitor changes in the provisions of this Policy and is responsible for and bears the negative consequences associated with failure to comply with this obligation.

9.5. If the User disagrees with the relevant changes, the User must stop using the Service and refuse the services provided by the Service Administration. Otherwise, the continued use of the Service by the User means that the User agrees to the terms of the Policy in the new edition.

9.6. The current version of the Policy is located in the relevant section on the Service and is constantly available at.

9.7. This Policy was drawn up in Russian. In the event of any discrepancies between the version of the Policy drawn up in Russian and the version of the Policy translated into another language, the provisions of the Policy drawn up in Russian will have priority and direct application.