

APPROVED
By Order of the General Director
of KIBERTEKH LLC
Dated December 25, 2024, No. 25/12/24-1

Privacy Policy

1. General Provisions

Use of the website <https://cyberbird.tech/> (hereinafter the “Website”) and other services operated by LLC "KIBERTEKH" (hereinafter the “Company”) implies the user’s acceptance of this Privacy Policy.

By accessing and using the Website and the Company’s services, the user voluntarily consents to the processing of their personal data for the purposes specified in Section 7 of this Policy.

If the user does not agree with any provision of this Policy, they must discontinue use of the Website.

This Policy applies exclusively to the Company’s Website. The Company does not control and is not responsible for third-party websites accessible via links provided on its Website.

1.1. Purpose of the Policy

This Privacy Policy defines the purposes and principles of personal data processing on the Website and outlines the data protection measures implemented by the Company, registered at: Zinin St. 9/23, Unit 37, Kazan, Republic of Tatarstan, 420097, Russian Federation (hereinafter the “Controller”).

This Policy is a publicly accessible document and may be reviewed by any interested party.

1.2. Key Definitions

Automated processing – processing of personal data using IT systems.

Blocking – temporary suspension of personal data processing (except where processing is required for clarification).

Processing – any operation performed on personal data, with or without automated means, such as collection, storage, use, transfer, anonymization, or deletion.

Controller – the entity determining the purposes and means of personal data processing.

Personal data (PD) – any information relating to an identified or identifiable natural person.

User – a visitor to or user of the Website.

Third-party disclosure – making personal data available to an indefinite number of recipients.

Website – a system of software and hardware for publishing publicly accessible information online.

Cookies – small data files stored on the user’s device to recognize repeat visits.

IP address – a unique network identifier of a device in an IP-based network.

Cross-border transfer – the transfer of personal data to a foreign state or entity.

Destruction – actions making it impossible to restore personal data in any form.

1.3. Principles for Ensuring Data Privacy

Lawfulness and fairness – data is processed in a legal and transparent manner.

Purpose limitation – data is collected for specified, legitimate purposes only.

Data minimization – only the data necessary for processing purposes is collected.

Proportionality – data processing aligns with the stated objectives.

No incompatible database merging – data collected for different purposes is not combined without justification.

1.4. User Rights

Users have the right to:

- Access information regarding the processing of their personal data;
- Request correction, blocking, or deletion of their personal data where it is inaccurate, outdated, or unlawfully obtained;
- Withdraw consent to processing, in accordance with applicable laws.

2. Legal Basis for Data Processing

This Policy is based on the following Russian legal acts:

- Constitution of the Russian Federation;
- Civil Code of the Russian Federation;
- Federal Law No. 152-FZ “On Personal Data”;
- Federal Law No. 149-FZ “On Information, Information Technologies and Protection of Information”;
- Presidential Decree No. 188 of March 6, 1997;

And other applicable laws and regulations on data protection.

3. Scope of Processed Data and Data Subjects

Purposes of processing:

- Distribution of informational and consulting materials;
- Enabling interaction with the Website and responding to inquiries;
- Gathering statistics to improve user experience and website content;

- Retargeting, marketing, analytics, and service promotion.

Types of data processed: IP address, cookies, geolocation, browser language, referring source, device and system information, session data (time, date, page views), visited URLs and on-page behavior.

Contact information: Full name, phone number, email address, and other information provided via contact forms.

4. Processing Procedure and Conditions

4.1. Processing Activities

The Company performs the following actions: collection, recording, structuring, storage, updating, retrieval, usage, transfer, blocking, deletion, and destruction of personal data.

4.2. Processing Methods

Processing is carried out with or without automated means. The Company ensures accuracy and relevance of personal data and complies with applicable laws.

Restricting cookies during a session does not constitute a blanket opt-out from processing for all future sessions.

Users may withdraw their consent at any time. However, the Company may continue processing where legally required.

Personal data may be disclosed to competent authorities only under a lawful basis.

4.3. Data Sharing

Personal data may be shared with third parties only:

- Where required by law;
- For the performance of a contract with the user;
- With the user's consent;
- Under agreements with agents or service providers acting on behalf of the Company

4.4. Data Security

The Company implements appropriate technical and organizational measures, including:

- Risk and threat assessment;
- Data protection controls in IT systems in accordance with Russian legislation.

4.5. Retention Period

Personal data is retained until processing purposes are fulfilled, the user withdraws consent, or the Controller ceases operations, unless otherwise required by law

4.6. Manual Processing

Processing of personal data without automated means is performed in accordance with Russian Government Decree No. 687 dated September 15, 2008.

5. Communications and Inquiries

Users may send legally binding communications regarding personal data to **customersupport@cyberbird.tech**

Consent may be withdrawn by sending a written request via email or using the contact form.

All inquiries are handled in accordance with Articles 14, 18, and 20 of Federal Law No. 152-FZ. The Company may extend the response period by up to five business days, with proper justification.

6. Final Provisions

The current version of this Privacy Policy is publicly available on the Company's Website at <https://cyberbird.tech/>.

The Company reserves the right to amend this Policy at any time by publishing an updated version on the Website.