

## **CONSENT TO THE PROCESSING OF PERSONAL DATA**

This form, “Consent to the Processing of Personal Data,” regarding the processing of personal data (hereinafter referred to as the “Consent”) has been developed for the purpose of implementing by Limited Liability Company “Data Diving Academy” (hereinafter referred to as LLC “Data Diving Academy,” the Operator) the requirements of Article 18.1, Clause 1 of Part 1 of Article 6, and Clause 1 of Article 9 of Federal Law No. 152-FZ of July 27, 2006 “On Personal Data,” as well as the provisions of the legislation of the Russian Federation that determine cases and specifics of personal data processing and establish requirements for the processing of personal data.

### **INTRODUCTION**

I, the User of the RosNavyk Web Service (hereinafter referred to as the “Service”), available at <https://rosnavyk.ru/> and its subdomains, acting (by making a feedback request, application, registration, or performing other actions related to entering my personal data into special forms on the Service website) freely, of my own will and in my own interest, give my full, specific, subject-oriented, informed, conscious, and unambiguous consent to Limited Liability Company “Data Diving Academy” OGRN 1217000010710, INN 7017489135, address: 634028, Tomsk, Arkadiya Ivanova St., 27, Apt. 51 (hereinafter referred to as the “Operator”) to process my personal data. This Consent is provided by me as a User explicitly by placing a separate mark (tick) in the checkbox with the wording: “I give my consent to the processing of personal data and have read the Personal Data Processing Policy and the Consent to the Processing of Personal Data” during registration. Placing this mark constitutes an unambiguous, informed, and conscious expression of the User’s will.

### **PERSONAL DATA PROCESSING IS CARRIED OUT UNDER THE FOLLOWING CONDITIONS:**

#### **1. CONSENT IS GIVEN FOR THE PROCESSING OF PERSONAL DATA WITH AND WITHOUT THE USE OF AUTOMATION TOOLS.**

#### **2. CONSENT IS GIVEN FOR THE PROCESSING OF THE FOLLOWING PERSONAL DATA (WHICH ARE NOT SPECIAL CATEGORIES OR BIOMETRIC DATA):**

2.1. General personal data provided by me, including when filling out online forms on the Service Website:

- surname, first name, patronymic (if any);
- email address (e-mail);
- contact phone number.

2.2. Additional personal data provided by me when registering in the Service (<https://lk.rosnavyk.ru/register>):

- location (city/locality);
- employment status (employed, studying, not employed);
- name of place of work or study (school, college, university);
- position;
- field of study, class/course;
- photograph;
- data of the document confirming the legality of the Representative’s authority (if necessary).

2.3. Data provided by the User when using the “Career Profile” Service (AI Navigator):

- age;
- average academic performance score;
- preferred school subjects;
- information about plans for further education (including intention to relocate and desired place of admission);
- information about interests and extracurricular activities;
- results of the professional aptitude test;
- list of professional skills selected by the User.

2.4. Technical data automatically collected when visiting and using the Service Website, including through the Yandex.Metrica web analytics service (when using the Yandex.Metrica web analytics service, the exact list of collected data is determined by Yandex LLC and is available at: <https://yandex.ru/support/metrica/ru/code/data-collected>):

- User’s IP address;
- information from cookie files;
- User’s device identifier;
- information about the User’s device;
- information about the User’s location (country, region, city) – based on the IP address or data of the User’s browser or device;
- type, version, and language of the browser used by the User;
- version and identifier of software;
- type and version of the operating system;
- date and time of the User’s use of the RosNavyk Service;
- statistics on the User’s use of the functions of the RosNavyk Service;
- information about errors occurring in the operation of components of the RosNavyk Service, including the type and time of occurrence of the error;
- information about mobile traffic;
- information about emerging security threats;
- information contained in Users’ appeals when contacting technical support, including information about the results of consideration of such messages;
- information about the performance of contractual obligations and keeping mutual settlements;
- information about linking the User’s equipment (device) to software located on the Internet when using the RosNavyk Service;
- hardware and software configuration of user equipment and installed modules;
- information about the addresses of requested Internet pages, reviews and questions, including viewed pages, filled fields, banner and video impressions and views, clicks, transitions, time spent on a page, as well as other similar technical information that may become available to the RosNavyk Service when used by the User.

### 3. PURPOSES OF PERSONAL DATA PROCESSING

- 3.1. Providing the User with access to the functionality of the Service and fulfilling obligations under the Contract concluded with the User.
- 3.2. Providing paid information Services “Career Profile” (AI Navigator), “Analytical Review” (AI Analyst), “Dashboard Widget” and generating personalized results for the User.
- 3.3. Establishing feedback with the User, including sending notifications and requests concerning the use of the Service, informing about the list of services and the procedure for their provision.
- 3.4. Improving the quality and personalization of recommendations provided within the framework of the free and paid services of the Service, convenience of its use, and development of new products and services.
- 3.5. Carrying out the types of activities provided for by the constituent documents.
- 3.6. Ensuring the protection of Users’ personal data from unauthorized access and disclosure.
- 3.7. For the personal data specified in Clauses 2.1–2.3 of this Consent:
  - identification of me as a User of the Service;
  - providing me with access to the Service, its functionality, and materials on a free and paid basis;
  - conclusion and performance of the Public Offer for concluding a contract for the provision of information services of the RosNavyk digital service (Contract): <https://lk.rosnavyk.ru/docs/user-agreement.pdf>, performance of the **Privacy Policy regarding the processing of personal data of users of the RosNavyk Web Service** of LLC “DATA DIVING ACADEMY” posted on the Service website at: <https://lk.rosnavyk.ru/docs/policy.pdf>, and other agreements with the Operator;
  - communication with me, including sending notifications, requests, and information concerning the use of the Service, the list of services and the procedure for their provision, as well as processing my requests and applications;
  - provision of information about the Operator’s courses, tariffs, special offers, and other services (with my separate consent to receive advertising mailings, if required by law);
  - implementation of civil-law relations, conclusion of civil-law agreements with Users, including service agreements, and carrying out mutual settlements;
  - provision of consulting and technical support to Users, in particular, as a Personal Data Subject;
  - accounting;
  - improving the quality of the Service, convenience of its use, and development of new products and services.
- 3.8. For the personal data specified in Clause 2.4 of this Consent:

- collecting statistics on visits to and use of the Service Website for its analysis and improvement;
- ensuring the functioning and security of the Service Website;
- improving the convenience of using the Service Website;
- conducting marketing research and analysis of user behavior.

#### **4. LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA**

Article 24 of the Constitution of the Russian Federation; the Civil Code of the Russian Federation; Articles 18.1, 6, and 9 of Federal Law No. 152-FZ of July 27, 2006 “On Personal Data”; provision of the User with access to the functionality of the Service and fulfillment of obligations under the Contract concluded with the User; this Consent to the processing of personal data; the Privacy Policy regarding the processing of personal data of users of the RosNavyk Web Service of LLC “DATA DIVING ACADEMY.”

#### **5. LIST OF ACTIONS WITH PERSONAL DATA IN THE COURSE OF THEIR PROCESSING**

Collection, recording, systematization, accumulation, storage, clarification (updating, amendment), extraction, use, transfer (provision, access, including to such persons as Yandex LLC for the functioning of the Yandex.Metrica service, as well as to specific Partners (educational organizations or employers) in the event and at the moment the User provides separate consent in the Service interface in accordance with Clause 8.2 of this Consent), depersonalization, blocking, deletion, destruction of personal data.

#### **6. METHODS OF PERSONAL DATA PROCESSING**

Personal data processing shall be carried out both with the use of automation tools (automated processing) and without the use of such tools (non-automated processing), if non-automated processing is necessary in connection with compliance with legal requirements.

#### **7. TERM OF VALIDITY OF THE CONSENT AND PROCEDURE FOR ITS WITHDRAWAL**

This Consent shall remain valid until the purposes of personal data processing are achieved, until the account is deleted, or until I withdraw this Consent. In the event the User’s account is deleted, personal data processing shall cease. I have been notified that this Consent may be withdrawn by me at any time by sending a written application to the Operator (including in the form of an electronic document signed with an electronic signature) to the email address: [support@rosnavyk.ru](mailto:support@rosnavyk.ru) or [info@data-diving.ru](mailto:info@data-diving.ru), or by sending a written application to the Operator’s postal address: 634028, Tomsk, Arkadiya Ivanova St., 27, Apt. 51. The Consent shall cease to be valid from the date specified in the application for withdrawal, but not earlier than the date on which the Operator actually receives the withdrawal of the Consent. In the event I withdraw my consent to the processing of personal data, the Operator shall have the right to continue processing personal data without my consent where there are grounds specified in Clauses 2–11 of Part 1 of Article 6, Part 2 of Article 10, and Part 2 of Article 11 of Federal Law No. 152-FZ of July 27, 2006 “On Personal Data.” In other cases, the Operator shall cease processing my personal data and destroy them within a period not exceeding thirty days from the date of receipt of the said withdrawal.

#### **8. TRANSFER OF DATA TO THIRD PARTIES**

8.1. I have been informed and agree that the Operator uses the Yandex.Metrica web analytics service on the RosNavyk Service Website, provided by Yandex LLC (16 L. Tolstoy St., Moscow, 119021, Russia). Data collected automatically by the Yandex.Metrica service (including cookie files and the data specified in Clause 2.4 of this Consent) are transferred to Yandex LLC for the purposes of analyzing the use of the Service, compiling reports on its operation, and providing other services related to website activity and the use of the Internet. A detailed list of data collected by the Yandex.Metrica service is available at: <https://yandex.ru/support/metrica/ru/code/data-collected>. Yandex LLC processes these data in accordance with its Privacy Policy (<https://yandex.ru/legal/confidential/>) and the Terms of Use of the Yandex.Metrica service ([https://yandex.ru/legal/metrica\\_termsfuse/](https://yandex.ru/legal/metrica_termsfuse/)). Consent to the use of cookies and the collection of data by the Yandex.Metrica service is also requested by means of a special notice (banner) upon the first visit to the Website.

8.2. The User has been informed and agrees that, in order to receive services related to the support of specific Partners (educational organizations or employers), including when activating Promo Codes provided by such Partners, the User’s personal data will need to be transferred to such third parties.

8.3. Procedure for transfer of data to Partners:

8.3.1. Transfer of data to a specific Partner shall be carried out only on condition that the User activates the Promo Code in the Service interface.

8.3.2. At the moment of entering the Promo Code, the Service displays to the User full information about the Partner to whom the data will be transferred (name and address), as well as the list of data to be transferred and the purposes of their processing.

8.3.3. By clicking the “Activate Promo Code” button and placing a mark of consent in the window that appears, the User gives separate specific consent to the transfer of their data to the specified Partner. Without placing such a mark, the data are not transferred and the Promo Code is not activated.

8.3.4. The purposes of such transfer are: assisting the User in admission to the Partner’s educational organization, informing about the Partner’s educational programs, career-guidance work, and inclusion in the Partner’s personnel reserve and applicant database.

## **9. OTHER CONDITIONS**

9.1. I confirm that I have read the Privacy Policy regarding the processing of personal data of users of the RosNavyk Web Service of LLC “DATA DIVING ACADEMY”, posted on the Service Website at: <https://lk.rosnavyk.ru/docs/policy.pdf>, and that the provisions of the said Policy are clear to me.

9.2. By this Consent, I confirm that the personal data provided by me are accurate.

9.3. My placing a mark in the relevant field (checkbox) on the Service Website and/or clicking the button to submit a form containing my personal data constitutes my written consent to the terms set forth in this Consent.

9.4. The Consent is indefinite and remains in effect until the moment the processing of personal data specified in Clause 7 of the Consent ceases.

## **10. OPERATOR DETAILS**

### **LLC “Data Diving Academy”**

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KPP 701701001

OGRN 1217000010710

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