PRIVACY POLICY
REGARDING THE PROCESSING OF PERSONAL DATA
when using the QWINS Hosting service

By agreeing to the provisions of this "Privacy Policy regarding the processing of personal data," the User gives their consent to the collection, storage, and protection of Personal Data by the Operator or by a third-party company acting on behalf of the Operator, in full compliance with existing rules and regulations for the storage and protection of personal data.

1. General

1.1. This personal data processing policy has been drawn up in accordance with the requirements of Federal Law No. 152-FZ of July 27, 2006, "On Personal Data" (hereinafter referred to as the "Personal Data Law") and defines the procedure for processing personal data and the measures taken by the Operator to ensure the security of personal data. No. 152-FZ "On Personal Data" (hereinafter referred to as the Personal Data Law) and defines the procedure for processing personal data and measures to ensure the security of personal data taken by **Individual Entrepreneur Matvey Vyacheslavovich Koshkin (TIN** 541300541971 **OGRNIP** 325547600053099**)**, operating under the brand name QWINS Hosting (hereinafter referred to as **the Operator**).

1.2. The Operator's most important goal and condition for carrying out its activities is to respect the rights and freedoms of individuals and citizens when processing their personal data, including protecting their rights to privacy and personal and family secrets.

1.3. This Operator's policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator may obtain about visitors and users of the website https://qwins.co and the official Telegram bot service https://t.me/qwins_robot.

1.4. The Operator carries out the initial collection, recording, systematization, accumulation, and storage of personal data of citizens of the Russian Federation using databases located in the Russian Federation, in accordance with the requirements of Article 18 of the Law on Personal Data.

2. Key terms used in the Policy

2.1. Automated processing of personal data — processing of personal data using computer technology.

2.2. Manual processing of personal data — processing of personal data without the use of computer technology.

2.3. Blocking of personal data — temporary suspension of the processing of personal data (except in cases where processing is necessary to clarify personal data).

2.4. Service — a website owned by Matvey Vyacheslavovich Koshkin (brand name QWINS Hosting), located on the Internet at https://qwins.co, as well as the official Telegram bot of the Service: https://t.me/qwins_robot, as well as its constituent derivative web pages, through which the Operator obtains contact information

about a potential User, ensuring interaction between the Operator and Users, electronic communication channels, including for the purposes of concluding a civil law contract, establishing a payment procedure, providing payment methods, and other purposes.

2.5. Personal data information system — a set of personal data contained in databases and information technologies and technical means that ensure their processing.

2.6. Depersonalization of personal data — actions that make it impossible to determine, without using additional information, the ownership of personal data by a specific User or other subject of personal data.

2.7. Processing of personal data — any action (operation) or set of actions (operations) performed with or without the use of automation tools on personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data.

2.8. Operator — a natural person who, independently or jointly with other persons, organizes and/or carries out the processing of personal data, as well as determines the purposes of personal data processing, the composition of personal data to be processed, and the actions (operations) performed with personal data.

2.9. Personal data — any information relating directly or indirectly to a specific or identifiable User of the website located on the Internet at https://qwins.co, as well as the official Telegram bot of the Service: https://t.me/qwins_robot.

2.10. Personal data authorized by the subject of personal data for distribution — personal data to which an unlimited circle of persons is granted access by the subject of personal data by giving consent to the processing of personal data authorized by the subject of personal data for distribution in accordance with the procedure provided for by the Law on Personal Data (hereinafter — personal data authorized for distribution).

2.11. User — any visitor or user of the website located on the Internet at https://qwins.co, as well as the official Telegram bot of the Service: https://t.me/qwins_robot**.**

2.12. Provision of personal data — actions, aimed at disclosing personal data to a specific person or a specific group of persons.

2.13. Distribution of personal data — any actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or at familiarizing an unlimited circle of persons with personal data, including publication of personal data in the mass media

placement in information and telecommunications networks or provision of access to personal data in any other way.

2.14. Destruction of personal data — any actions that result in the irretrievable destruction of personal data with no possibility of further restoration of the content of personal data in the personal data information system and/or the destruction of physical media containing personal data.

3. Basic rights and obligations of the Operator

3.1. The Operator has the right to:

— receive from the subject of personal data reliable information and/or documents containing personal data;

— in the event that the subject of personal data withdraws their consent to the processing of personal data, as well as sends a request to terminate the processing of personal data, the Operator has the right to continue processing personal data without the consent of the subject of personal data if there are grounds specified in the Personal Data Law;

— independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations provided for by the Personal Data Law and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws.

— store the personal data received for no more than 3 years from the date of receipt, unless a longer storage period is established by the legislation of the Russian Federation, and destroy or anonymize personal data before the specified period upon achieving the purposes of processing or when the need to achieve them is no longer necessary;

— independently use the personal data received to perform contracts with Users, ensure the functioning and security of the Service, send notifications related to the use of the Service, compile statistics and analytics on the use of the Service in a depersonalized form, as well as to improve the performance of the Service and the user experience.

3.2. The Operator undertakes to:

— provide the subject of personal data, at their request, with information regarding the processing of their personal data;

— organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;

— respond to requests and inquiries from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;

— provide the authorized body for the protection of the rights of personal data subjects with the necessary information at the request of that body within 10 days from the date of

receipt of such a request;

— publish or otherwise provide unrestricted access to this Policy regarding the processing of personal data;

— take legal, organizational, and technical measures to protect personal data from unauthorized or accidental access, destruction, alteration, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data;

— to stop the transfer (distribution, provision, access) of personal data, to stop processing and to destroy personal data in the manner and in the cases provided for by the Personal Data Law;

— perform other duties stipulated by the Personal Data Act.

— not to publish the personal data received in open access without the consent of the personal data subject.

4. Basic rights and obligations of personal data subjects

4.1. Personal data subjects have the right to:

— receive information regarding the processing of their personal data, except in cases provided for by federal laws. The information is provided to the personal data subject by the Operator in an accessible form and must not contain personal data relating to other personal data subjects, except in cases where there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it is established by the Personal Data Law;

— to request that the operator clarify, block, or destroy their personal data if the personal data is incomplete, outdated, inaccurate, illegally obtained, or unnecessary for the stated purpose of processing, as well as to take measures provided for by law to protect their rights;

— to withdraw consent to the processing of personal data, as well as to send a request to stop processing personal data;

— to exercise other rights provided for by the legislation of the Russian Federation.

4.2. Personal data subjects are required to:

— provide the Operator with accurate information about themselves;

4.3. Persons who have provided the Operator with inaccurate information about themselves or information about another personal data subject without the latter's consent shall be liable in accordance with the legislation of the Russian Federation.

5. Principles of personal data processing

5.1. Personal data is processed on a lawful and fair basis.

5.2. The processing of personal data is limited to the achievement of specific, predetermined, and lawful purposes. The processing of personal data that is incompatible with the purposes of collecting personal data is not permitted.

5.3. Only personal data that meets the purposes of its processing shall be processed.

5.4. The content and scope of the personal data processed shall correspond to the stated purposes of processing. The processing of personal data shall not be excessive in relation to the stated purposes of processing.

5.5. When processing personal data, the accuracy, adequacy, and, where necessary, relevance of the personal data to the purposes of processing shall be ensured.   personal data.   The operator   shall take   the necessary   measures and/or ensure that they are taken to delete or correct incomplete or inaccurate data.

5.6. Personal data is stored in a form that allows the subject of the personal data to be identified for no longer than is necessary for the purposes of processing the personal data. The storage period for personal data does not exceed 3 years from the date of termination of use of the Service by the User, unless a longer period is required by Russian law or necessary to protect the rights and legitimate interests of the Operator.

Processed personal data shall be destroyed after the expiry of the processing period or in the event that the need to achieve these purposes ceases to exist, unless otherwise provided by federal law.

6. Purposes of personal data processing

Purpose of processing	- communication between the Operator and the User; - conclusion, execution, and termination of civil law contracts; - conducting statistics and analytics on the use of the Service, improving the functioning of the Service and the user experience;
Personal data	- the email address that the User provides in the feedback form or in messages sent through communication channels, as well as when registering an account with the Service; - Name that the User specifies in the feedback form or messages sent

	through communication channels, as well as when registering an account with the Service; • Telegram ID and nickname in Telegram; • cookie data and technical information about visiting the website; • The phone number that the User provides in the feedback form or in messages sent through communication channels, as well as when registering an account on the Service;
Legal grounds	• contracts concluded between the operator and the subject of personal data; • this privacy policy; • Federal Law No. 152-FZ of July 27, 2006, "On Personal Data"
Types of personal data processing	• collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision), depersonalization, blocking, deletion, destruction of personal data

7. Terms and conditions of personal data processing

7.1. Personal data is processed with the consent of the personal data subject to the processing of their personal data.

7.2. The processing of personal data is necessary to achieve the objectives provided for by law, to perform the functions, powers, and duties assigned to the operator by the legislation of the Russian Federation, as well as to improve the quality of services provided by the operator.

7.3. The processing of personal data is necessary for the performance of a contract to which the personal data subject is a party or beneficiary or guarantor, as well as for the conclusion of a contract at the initiative of the personal data subject or a contract under which the personal data subject will be the beneficiary or guarantor.

7.4. The processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator or third parties, or for the achievement of socially significant goals, provided that this does not violate the rights and freedoms of the subject of personal data.

7.5. In cases where the Operator is required by Russian law to publish or disclose personal data, such processing shall be carried out in compliance with the requirements of the Personal Data Law.

7.6. Personal data subject to publication or mandatory disclosure in accordance with federal law shall be processed.

8. The procedure for collecting, storing, transferring, and other types of processing of personal
data

The security of personal data processed by the Operator is ensured through the implementation of legal, organizational, and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.

8.1. The Operator ensures the security of personal data and takes all possible measures to prevent access to personal data by unauthorized persons.

8.2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the enforcement of applicable law or if the subject of the personal data has given consent to the Operator to transfer the data to a third party in order to fulfill obligations under a civil law contract, as well as to ensure the operation of the QWINS Hosting service, improve its functionality, and conduct analytics.

8.3. If inaccuracies are found in personal data, the User may update them independently by sending a notification to the Operator via the Operator's contact details marked "Update of personal data".

8.4. The term for processing personal data is no more than 3 years.

The user may withdraw their consent to the processing of personal data at any time by sending a notification to the Operator using the contact details on the Website marked "Withdrawal of consent to the processing of personal data" or by sending a written or electronic application to the Operator using the following contact details:

- email:help@qwins.co ;

The Operator shall cease processing personal data subject to processing on the basis of consent and shall destroy or anonymize it within a period not exceeding 30 calendar days from the date of receipt of the application, unless shorter periods are established by law, except in cases where processing continues on other grounds provided for by Federal Law No. 152-FZ.

8.5. Prohibitions established by the subject of personal data on the transfer (except for providing access), as well as on the processing or conditions of processing (except for obtaining access) of personal data, permitted for distribution, do not apply in cases of processing of personal data in the state, public, and other public interests defined by the legislation of the Russian Federation.

8.6. When processing personal data, the operator ensures the confidentiality of personal data.

8.7. The operator stores personal data in a form that allows the subject of the personal data to be identified, for a period not exceeding 3 years.

8.8. The termination of personal data processing may be due to the expiration of the consent of the subject of personal data, the withdrawal of consent by the subject of personal data or a request to terminate the processing of personal data, the achievement of the purpose of personal data processing, as well as the detection of unlawful processing of personal data.

8.9. The Operator may transfer personal data across borders to foreign countries for the purposes of operating the Service, processing requests, sending notifications, and making payments, including through the use of data centers, email services, and analytics.

If such a transfer is carried out by the Operator, prior to the cross-border transfer of personal data, the Operator shall ensure that the foreign state to whose territory the transfer is made provides adequate protection of the rights of personal data subjects or ensures compliance with the conditions provided for in Article 12 of Federal Law No. 152-FZ of July 27, 2006, "On Personal Data."

9. List of actions performed by the Operator with the personal data received

9.1. The Operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes, and destroys personal data.

9.2. The Operator performs automated or manual processing of personal data with the receipt and/or transfer of the received information via information and telecommunications networks or without them.

10. Confidentiality of personal data

10.1. The operator and other persons who have access to personal data are obliged not to disclose to third parties and not to distribute personal data without the consent of the subject of personal data.

11. Final provisions

11.1. The user may obtain any clarifications on issues of interest concerning the processing of their personal data by contacting the Operator using the contact details on the website.

11.2. This document will reflect any changes in the Operator's personal data processing policy. The policy is valid indefinitely until it is replaced by a new version.

version.

11.3.   The current version of the Privacy Policy is freely available on the Internet at **https://qwins.co/.**

12. Details and contact information of

individual entrepreneur Matvey Vyacheslavovich Koshkin

TIN 541300541971

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Website: https://qwins.co/

Telegram bot: https://t.me/qwins_robot

Email: help@qwins.co