

## **DISCLAIMER FOR CITIZENS OF THE EUROPEAN UNION AND CITIZENS OF OTHER COUNTRIES WITH THEIR OWN LEGISLATION ON PERSONAL DATA PROTECTION**

This disclaimer is provided to inform citizens of the European Union and citizens of other countries with their own legislation on personal data protection:

This website is developed and used to provide services to citizens of the Russian Federation and legal entities registered in the Russian Federation. We understand that the scientific community is international, and a user may be a citizen of a country with its own provisions on the protection and processing of personal data. As “Sudo” LLC does not intend to provide services to citizens of such countries, “Sudo” LLC is not commonly a personal data processor under the legislation known to “Sudo” LLC.

Your personal data is subject to protection under the current Russian law on the processing and protection of personal data: Federal Law No. 152-FZ of July 27, 2006, “On Personal Data”. This law and other state regulations adopted in its implementation, as well as the internal policies of “Sudo” LLC, provide data subjects with sufficient rights and privileges and establish obligations for “Sudo” LLC to an extent not less than under the known to “Sudo” LLC legislation of other countries.

## **PRIVACY POLICY**

This Privacy Policy (hereinafter referred to as the 'Policy') governs the collection, use, and other forms of processing of personal data by “Sudo” LLC when users operate the website on the Internet at <https://ucp.academy/>, as well as the privacy policy regarding materials posted by users. By using this website, the user of the site agrees to the terms of this Privacy Policy.

The website may contain links to the websites of other organizations. Users should carefully review the privacy policies of these sites due to the potential differences from this Privacy Policy.

### **1. TERMS AND DEFINITIONS**

- 1.1. **Company** – “Sudo” LLC (TIN: 7801646991, Registration №: 1187847210407), responsible for the collection and all stages of processing personal data on the Website.
- 1.2. **Website** - aggregate of logically connected web pages on the Internet at the address: <https://ucp.academy/>
- 1.3. **User** - an individual using the Website and providing the Company with their personal data (personal data subject).
- 1.4. **Personal Data** - any information directly or indirectly related to an identified or identifiable individual (personal data subject).
- 1.5. **Processing of Personal Data** - any action (operation) or set of actions (operations) performed with or without the use of automation tools involving personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

### **2. GENERAL PROVISIONS**

The Policy regulates the procedure for processing and using the personal data of Website Users in accordance with Federal Law No. 152-FZ of July 27, 2006, “On Personal Data”.

2.1. By providing the Company with their personal data, the User expresses consent for their processing by the Company in any manner for the purposes outlined in the Policy. The User also agrees to the transfer of such data to third parties in cases specified in this Policy.

2.2. In case of disagreement with the terms of this Policy, the User must cease using the Website.

### **3. INFORMATION COLLECTED BY THE COMPANY**

3.1. The Company collects, accesses, and uses, for specific purposes outlined in the Policy, the User's personal data, technical, and other information related to the User.

3.2. Technical information is not considered personal data; however, the Company uses cookies, which can identify the User. Cookies are text files accessible to the Company to process information about the User's activity, including details about visited pages and the time spent on each page. The User can disable the use of cookies in the browser settings.

Technical information also includes data automatically transmitted to the Company during the use of the Website through the User's device software, specifically:

User's internet activity data, including visited pages, date and time of URL transitions, etc.

Information about the device and browser used to access the Internet, such as IP address, and (if the User accesses the Website from a mobile device) the type of device and its unique identifier;

Data on the User's interaction with the Company's displayed off-site advertisements, including the number, frequency, and depth of views.

3.3. Personal data of the User includes information provided by the User to the Company when accessing the Website, registering on the Website, and using the Website, including:

Full name (last name, first name, patronymic);

Email address;

Phone number;

Employment information;

Academic degree and qualifications;

Any other information provided by the User to the Company through the Website.

### **4. PURPOSES OF PROCESSING USER'S PERSONAL DATA**

4.1. The Company uses the information provided by the User for the following purposes: establishing communication with the User, including sending notifications and inquiries related to the use of the Website, processing requests and applications from the User, conducting market analysis and improving the Company's operations, maintaining statistics, sending informational, advertising, and other messages to the User's email address, individually notifying the User about vacancies matching their profile, performing other actions specified at the time or during the collection of information, and complying with the requirements of the legislation of the Russian Federation.

4.2. The Company does not verify the accuracy of the information provided by the User, as well as the legal capacity of the User.

4.3. The User has the right to opt-out of receiving informational, advertising, and other messages by using a special link in the sent messages or by sending a written statement to the email address: [contact@ucp.academy](mailto:contact@ucp.academy).

- 4.4. The Company has the right to process the User's personal data without time limitations, in any lawful manner, including in information systems using automation tools or without such tools.
- 4.5. The Company may transfer personal data to third parties providing services to the Company to perform certain actions on behalf of the Company regarding the processing of personal data. The Company undertakes to require such third parties to ensure proper protection of the User's personal data.
- 4.6. The Company is entitled to transfer the User's personal data to conference organizers when necessary for the User's participation in the conference (for access control, preparation of methodological materials, and other organizational purposes).
- 4.7. The Company is not allowed to sell, lease, or otherwise transfer the User's personal data to third parties for their own purposes, not provided for in this Policy.

## **5. DATA PROTECTION**

- 5.1. All personal data provided by the User to the Company is subject to protection. The Company undertakes to apply sufficient and objective methods of personal data protection in accordance with the anticipated threat levels to prevent unauthorized access by third parties.
- 5.2. Personal data posted by the User in the corresponding sections for public access (last name, first name, patronymic, contact email address, contact phone number, employment information, academic degree, qualification) by the User's own initiative and with the User's consent are not protected due to their dissemination to an unlimited circle of individuals by the User.
- 5.3. The User is informed that search engines on the Internet index the content of the Website, so information about the User placed with their consent in open access on the Website may be used in search results.
- 5.4. During the processing and transmission of personal data, the Company undertakes to use encryption of an adequate level to ensure the confidentiality of data during transmission.
- 5.5. The User is solely responsible for the security of the data used for authorization in the personal account on the Website (login, password, email address). In case the User discloses information about the login, password, or email address used for authorization on the Website to third parties, such third parties may gain unauthorized access to the User's personal data and confidential information. In the event of such disclosure or compromise of information, the User is obliged to promptly notify the Company of this fact to block access to the User's personal account.
- 5.6. The Company restricts access to personal data of the User and confidential information of the User for its employees, contractors, and other third parties.

## **6. CONFIDENTIALITY OF PUBLISHED MATERIALS**

- 6.1. The User is solely responsible for the confidentiality of information in materials posted by them on the Website.
- 6.2. In the event that the Company discovers personal data or confidential information of third parties in the User's materials, the Company has the right to restrict access to the published materials to protect the personal data of third parties or their confidential information.

## **7. FINAL PROVISIONS**

- 7.1. Legal relations between the Company and the User arising from the application of this Policy are governed by the current legislation of the Russian Federation.

7.2. Compliance with the requirements of this Policy is monitored by individuals responsible for organizing the processing of the Company's personal data, as well as for the security of personal data.