

**Privacy Policy of  
PUMPA Educational Center**

PUMPA Educational Center Limited Liability Company (hereinafter referred to as the Educational Center) undertakes to protect and maintain confidentiality of registered users. The privacy policy establishes the order of using cookies, processing of information provided by the user to the Educational Center, or information collected by the Educational Center about users (hereinafter referred to as the "Policy").

**1. The Educational Center can receive information about users in the course of their use of the following services:**

1.1. Internet portals (sites) including:

- <http://pumpagroup.ru/>; <http://pumpaedu.ru/>; [pumpaedu.com](http://pumpaedu.com), <http://ortodepo.ru/>; [Http://forestadent.ru/](http://forestadent.ru/); <http://operatorsdictionary.ru/>; <http://orthotechnology.ru/>, [zubshetki.ru](http://zubshetki.ru), [kapy.ru](http://kapy.ru), [drgum.ru](http://drgum.ru);
- or in other Internet portals where this policy is posted (hereinafter referred to as "Sites");
- Registration (creation an account) and its use on the site (hereinafter referred to as the "Account").

1.2. The use of the Educational Center services by the user, including goods sales via the Internet portal access to which can be provided by the Educational Center site or through third-party sites or social networks (hereinafter collectively referred to as the "Additional services").

1.3. In this Policy, sites, account, and additional services are collectively referred to as "Services".

**2. Personal data (information) about user which the Educational center is entitled to collect.**

2.1. When accessing the Site of the Educational Center by the user, as well as during receipt of services, the Educational Center receives the following categories of the user's personal data:

- When creating an account, the user provides the Educational Center with the right to receive, process, and use the following information of the account: email address, phone number, social network ID, and the country of residence.

2.2. When accessing services by the user, the Educational Center receives, processes and uses the following tracking data:

2.2.1. The Information about the user's access to the Educational Center services including, but not limited to, information about the time and method of using the services, data flow and entries of screen elements to which the user clicks with the mouse while using the Educational Center services (browsing history).

2.2.2. Log files (logs) and statistics about activities on the sites of the Educational Center.

2.2.3. The technical information about devices, operating systems and other software used by the user in the process of visiting sites or using services, in particular, information on information carrier access controls, device ID, similar device IDs, IP address, and information about the browser used.

2.3. To receive and process tracking data, the Educational Center uses identification files stored in the user's system (cookie files). The use and function of cookies is described in clause 4 of this Policy.

2.4. When accessing the services by the user, the Educational Center receives and processes the following data about information materials:

2.4.1. Information sent through the site registration function.

2.4.2. Data provided by the user when submitting a request for information or support, or when purchasing services from the Educational Center including information necessary to process orders

placed by the user, including transaction sum but excluding financial information sent directly to the trading-payment company via a secure data transfer protocol.

2.4.3. Data not identifying the user except for account data provided during participation in the Educational Center services and in other marketing activities or questionnaires.

### **3. The educational center does not receive the following information:**

3.1. Financial information provided by the user when making payments for any services (credit card number, servicing bank or information collected and processed by the relevant payment companies (systems)).

3.2. The educational center does not request (does not collect) any personal data with regard to the user or third parties, including names, copies of identity documents and identification number; such data are submitted upon personal desire of the user, while the user has the right not to provide the Educational Center with such data and not post them on sites.

3.3. Any personal data provided by the user unilaterally will be removed from Internet resources of the Educational Center automatically.

3.4. The Educational Center does not store, process and transfer personal data of the user, except for when providing educational services.

### **4. Cookies**

4.1. Sites use cookies and similar technologies to collect tracking data to identify users.

4.1.1. These technologies ensure the provision of high-quality access to sites and the use of services.

4.2. A cookie is a file consisting of letters and numbers and which is saved on a user's computer or device when visiting a site. The user may refuse using cookies.

4.2.1. The signing (acceptance) of this policy means the user's consent to use cookies if at the appropriate moment the reception of cookies is allowed by settings / configuration of the user's browser.

4.2.2. In cases of user's refusal, the Educational Center saves only one permanent "normative" cookie that reports the user's refusal to use any other cookies.

4.3. The following categories of cookies are used by sites of the Educational Center use:

- Obligatory cookies that are required when surfing site sections and using the site functions (it is impossible to use the site of the Educational Center without using obligatory cookies); as a result, the user provides the right to use this category of cookies. Along with it, the site encryption language uses session cookies (closing a browser by the user is an automatic deletion of the obligatory cookie; this file does not save any information about visitors after the browser is closed).
- Technical cookies save anonymous information about user's way of using sites and their functions, in particular, the information about most frequently visited pages of websites, viewed advertising, or advertising which the user works with on sites or other sites where the Educational Center advertises, as well as information about error's notifications received by the user.
- Analytical cookies may be used by Google Analytics, an analytical Internet service provided by Google, Inc. (hereinafter referred to as "Google"). Google Analytics uses cookies which are text files stored in the user's computer and help the Education Center to analyze trends in sites using by users. Data about the user's use of sites (including your IP address) saved in the cookie is sent and stored by Google on servers in the USA. By accepting this Policy, the user gives his consent to such storage. In case the hidden IP address function is enabled, Google disconnects / anonymizes the last octet of the IP address for the member countries of the European Union and other parties to the Agreement on the European Economic Area.

Full IP addresses, which are then shortened to Google servers in the USA. Google, on behalf of the Educational Center, uses the data received to assess the nature of sites using by the user, makes reports for the Educational Center on users' activities on the site, as well as provides other services related to the analysis of activities on sites and the use of the Internet. Google does not bind the user's IP address to any other data stored in Google. Besides, the user can prevent data collection and use by Google (cookies and IP addresses) by downloading and installing browser extensions available at the following link: <https://tools.google.com/dlpage/gaoptout/>. For more information, please visit <http://www.google.com/analytics/terms/gb.html> (Google Analytics Terms of Service and Privacy Policy). (Sites may use other similar analytical cookies, including those from Yandex.Metrica and CrazyEgg services. Such cookies are used to retrieve information about the use of sites by users. Data are collected anonymously and used for reports on the number of sites visitors, their location, and visited pages).

- Functional cookies are used to store user's preferences (e.g., preferred language, country or other online settings) and collect anonymous information.
- Addressed or advertising cookies can be stored in the user's device as independent third-party advertising files, advertising networks, data exchange systems providers, analytical marketing systems, and other services.
- Independent address cookies collect data about user-visited pages of various sites and online services to show the user the relevant advertisements on websites and online services of third parties. Advertising networks can send such information to advertisers using their own networks (data received through such independent advertising cookies do not contain information allowing to identify the user but are used to identify users on different sites).

## **5. Using of user's data by the Educational Center**

5.1. The Educational Center is entitled to use information provided by the user or collected by the Educational Center about the user, for the following purposes:

When providing educational services, the Educational Center has the right to collect and process data about the user account, tracking data and data about information materials in order to provide services interesting to the user, as well as performing the terms of the agreement accepted by the user. Data received for this purposes will be kept within the duration of the requested services, as well as in accordance with Federal Law No. 152-FZ of 27.07.2006 "On Personal Data".

5.2. The user gives his consent to the Educational Center to process all received data in order to detect, investigate and prevent illegal actions or actions that infringe the Agreement, as well as actions that infringe provisions of the Agreement. Such data are stored for ten calendar days from the date the account has been closed, unless a longer period is stipulated by the current legislation of the Russian Federation.

5.2.1. The Educational Center has the right to use the user's email address to provide information about the services provided by the Educational Center.

5.2.2. Refusal to use the email address for the purposes specified in article 5.2.1. is made by the user independently, both when creating an account, and at any time in the personal cabinet of the account.

5.3. The Educational Center has the right to use tracking data to monitor, improve or adjust the services quality to achieve better delivery of educational services provided.

5.4. The Educational Center can create a "personal user profile" by linking the account data to the tracking data in order to improve or correct the quality of services, as well as for own advertising purposes - for advertising and market research.

## **6. Transfer of user information to other persons**

- 6.1. The Educational Center does not transfer the user data to other persons, except for:
- in case the Educational Center is to transfer information in accordance with the current legislation or at the request of law enforcement authorities in order to prevent illegal actions; -
  - if it is necessary for the implementation of the Agreement, as well as providing the user with services that the user requests from the Educational Center.
- 6.2. The Educational Center has the right to transfer anonymous information (i.e., information that does not identify the user directly or indirectly) and generalized information (i.e., information about groups and categories of users, including statistics that cannot be used to identify the user) to the advertising partners of the Educational Center.
- 6.3. The Educational Center can also allow advertisers to collect anonymous and generalized information within the framework of the services provision.
- 6.3.1. Advertisers can collect information using tracking technologies (e.g., cookies and web beacons).

## **7. Safety**

- 7.1. The Educational Center takes all necessary precautions to prevent loss, unauthorised use or alteration of user data.
- 7.2. The staff of the Educational Center, contractors and authorized persons having access to data and information about the user shall ensure their confidentiality.
- 7.3. Third parties are also prohibited to use information for any purposes other than those specified above, or in connection with the user requests processing.
- 7.4. The Educational Center takes necessary technical, administrative, and physical security measures to protect the personal data of the user.

## **8. Third Parties Sites**

- 8.1. Services may contain links to other sites and services provided by third parties, including retailers, in favour of which the user makes payment.
- 8.2. The terms of this Policy shall apply only to data and information of a user registered on the Educational Center site or for the purpose of receiving the educational services.
- 8.3. The Educational Center is not liable for any data which might be collected, stored and use through the sites of third parties or within services they provide. By signing this Policy, the user undertakes to bear the independent liability for personal data provided to third parties by means of visiting third-parties sites or registration.

## **9. The user's rights**

- 9.1. An inalienable right of the user is the refusal to process his personal data by the Educational Center; at any time the user has the right to exercise the following rights with regard to the data provided by the user, in particular:
- The user has the right to request the Educational Center to provide him with a copy of data available with the Educational Center, or information on their processing procedure.
- The user has the right to apply to the Educational Center to update and correct any user data stored at the Educational Center if they are outdated or unreliable;
- The user has the right to withdraw his consent to process the data. In this case, the Educational Center may be deprived of the opportunity to provide services to the user.
- 9.2. In cases of exercising their rights, the user should contact the Customer Support Center at +7 (495) 249-17-71.
- 9.3. In case of request to delete user's personal data, the Educational Center has the right to save a separate backup copy of this data according to the current legislation of the Russian Federation.

## **10. Amendments to this Policy**

10.1. The Educational Center may, from time to time, for various reasons, make amendments to this Policy to reflect changes in legislation and regulations, sectoral principles and technical developments.

10.2. In case of user's registration (creating an account) on <http://pumpagroup.ru/>; <http://pumpaedu.ru/>; [pumpaedu.com](http://pumpaedu.com), <http://ortodepo.ru/>; <http://forestadent.ru/>; <http://operatorsdictionary.ru/>; <http://orthotechnology.ru/>, [zubshetki.ru](http://zubshetki.ru), [kapy.ru](http://kapy.ru), [drgum.ru](http://drgum.ru), the Educational Center sends the appropriate notice of amendments (additions) to this policy to the e-mail address specified in the user's account.

10.3. The current version of this Policy shall apply to all registered users of the sites of the Educational Center, <http://pumpagroup.ru/>; <http://pumpaedu.ru/>; [pumpaedu.com](http://pumpaedu.com), <http://ortodepo.ru/>; <http://forestadent.ru/>; <http://operatorsdictionary.ru/>; <http://orthotechnology.ru/>, [zubshetki.ru](http://zubshetki.ru), [kapy.ru](http://kapy.ru), [drgum.ru](http://drgum.ru), and published on the main page of the sites.

10.4. The version of this Policy and amendments (additions) thereto come into force from the moment being published, as well as in the form of an acceptance signed by the user with the Educational Center, followed by the receipt of a notification to the user e-mail address specified during registration.