

# EU PRIVACY POLICY

Last updated: 11.01.2021

## 1. Who we are

1.1. We are Limited Liability Company «GeekBrains» located 121205, Moscow, Territorija Innovatsionnogo Tsentra Skolkovo, Bolshoj blvd, 42, bld 1, floor 3, room 1199, place 5 (hereinafter "GeekBrains").

1.2. This Privacy Policy sets out how we collect and use your personal information when you use GeekBrains's website (hereinafter "Site") offered by GeekBrains and the choices available to you in connection with our use of your personal information (hereinafter "Privacy Policy").

## 2. This Privacy Policy

2.1. By making available the Site we, acting reasonably and in good faith, believe that you:

- (a) have all necessary rights to use the Site;
- (b) provide true information about yourself to the extent necessary for contact you;
- (c) are aware of and accept this Privacy Policy.

2.2. We do not check the information received from you, except where such check is necessary in order for us to fulfill our obligations to you.

## 3. Information we collect about you

3.1. In order to provide you with access to the use of the Site, as well as to contact you to provide information about our courses or about your opportunities to work with us we will improve, develop and implement new features to our Site, and enhance the available Site functionality. To achieve these objectives, and in compliance with applicable laws, we will collect, store, aggregate, organise, extract, compare, use, and supplement your data (hereinafter "processing"). We will also receive and pass this data, and our automatically processed analyses of this data to our affiliates and partners as set out in the table below and section 4 of this Privacy Policy.

3.2. We set out in more detail the information we collect when you use our Site, why we collect and process it and the legal bases below.

	<b>Information Collected</b>	<b>Purpose</b>	<b>Legal Basis</b>
1	Data you provide for sending an application for getting consultation on educational programs, such as name, email, phone number	We use information to contact you and provide information on educational programs	Consent
2	Data you provide for sending an application in order to become part of our team, such as your name, email, phone number and link to CV or LinkedIn profile	We use information to contact you	Consent

3	<p>Technical data received when you use the site, regarding technical devices, technical interaction with the site (including but not limited to the following information: device type, device model, your device name, OS name, OS version, timezone, browser type, browser name, browser version, screen resolution, preferred language, network connection type, Wi-Fi network name, Wi-Fi hotspot MAC, mobile network operator, mobile network code (MNC), IP address, User ID).</p> <p>Also see our cookies policy for more detail on cookies, web beacons, and other information collected automatically by our website.</p>	<p>We use your data for internal review in order to optimizing your user experience, to understand any errors you may encounter when using the site and to personalize your use of our site.</p>	<p>Legitimate Interests</p>
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3.3. Our legitimate interests include (1) maintaining and administering the Site; (2) ensuring your data is adequately protected; and (3) compliance with any contractual, legal or regulatory obligations under any applicable law.

3.4. Your personal information may also be processed if it is required by a law enforcement or regulatory authority, body or agency or in the defence or exercise of legal claims.

We will not delete personal information if it is relevant to an investigation or a dispute.

It will continue to be stored until those issues are fully resolved and/or during the term that is required and/or permissible under applicable/relevant law.

3.5. Please note, if you withdraw your consent to processing or you do not provide the data that we require in order to maintain and administer the Site, you may not be able to access the Site.

3.6. If we intend to further process your data for any other purpose to those set out in this Privacy Policy, we shall provide you with details of this further purpose before we commence processing.

#### **4. Data sharing and International Transfers**

4.1. We may share your data with MGL MY.COM (CYPRUS) LIMITED and other our affiliates. Sometimes we may also need to share your data with a third party in order to provide our Site to you or to administer the Site.

4.2. We may transfer and maintain on our servers or databases some of your personal information outside the European Economic Area (EEA) including in Russia.

4.3. The countries to which we transfer your data may not have the same data protection laws as your jurisdiction. We take reasonable cyber security measures and/or put in place the Standard Contractual Clauses (e.g. Model Clauses, Data Processing Agreement/Addendum) to ensure your data is adequately protected.

#### **5. Retention Periods**

5.1. We will retain your personal data during three (3) months from date when we received them from you.

5.2. Your personal data may be deleted before expiration of term specified at clause 5.1 herein if you send us a request in the manner described at clause 8.2 herein.

#### **6. Your Rights**

6.1. You have the following rights, in certain circumstances, in relation to your personal information:

(a) Right to access your personal information.

(b) Right to rectify your personal information: you can request that we update, block or delete your personal data, if the data is incomplete, outdated, incorrect, unlawfully received or no longer relevant for the purpose of processing.

(c) Right to restrict the use of your personal information.

(d) Right to request that your personal information is erased.

(e) Right to object to processing of your personal information.

(f) Right to data portability (in certain specific circumstances).

(g) Right not to be subject to an automated decision.

(h) Right to lodge a complaint with a supervisory authority.

6.2. If you would like to exercise these rights, please contact our support by sending email at [support@geekbrains.ru](mailto:support@geekbrains.ru) or letter in writing to 121205, Moscow, Territorija Innovatsionnogo Tsentra Skolkovo, Bolshoj blvd, 42, bld 1, floor 3, room 1199, place 5. We will aim to respond to you within 30 days from receipt of request. We will need to verify your identity before we are able to disclose any personal data to you.

## **7. Security Measures**

7.1. We take technical, organizational and legal measures, including, where suitable, encryption, to ensure that your personal data is protected from unauthorized or accidental access, deletion, modification, blocking, copying and dissemination.

## **8. Changes to this Policy**

8.1. From time to time, we may change and/or update this Privacy Policy. If this Privacy Policy changes in any way, we will post an updated version on this page. We will store the previous versions of this Privacy Policy in our documentation archive. We recommend you regularly review this page to ensure that you are always aware of our information practices and any changes to them.

## **9. Contact Us**

9.1. If you have any questions, please send your inquiries to our support by sending email at [support@geekbrains.ru](mailto:support@geekbrains.ru) or letter in writing to 121205, Moscow, Territorija Innovatsionnogo Tsentra Skolkovo, Bolshoj blvd, 42, bld 1, floor 3, room 1199, place 5. So we can deal with your enquiry effectively, please quote this Privacy Policy. We will aim to respond to you within 30 days from receipt of request.

9.2. All correspondence received by us from you (written or electronic inquiries) is classified as restricted-access information and may not be disclosed without your written consent. The personal data and other information about you may not be used without your consent for any purpose other than for response to the inquiry, except as expressly provided by law.

9.3. The e-mail address of our DPO is [dpo@corp.my.com](mailto:dpo@corp.my.com).