

Privacy Policy and Personal Data Processing Policy

of the web service «aiTurbo»

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This is an English translation provided for convenience. The Russian-language version of this Policy is the legally binding document and prevails in case of any discrepancy.

1. General Provisions

1.1. This Privacy Policy and Personal Data Processing Policy (hereinafter - the Policy) defines the procedure for handling information and processing personal data that Individual Entrepreneur Marat Anvarovich Shabaev (hereinafter - the Administration) may receive from users (hereinafter - the User) when using the web service located at <https://aiturbo.org> (<https://app.aiturbo.org>) (hereinafter - the Service), as well as the Administration's position regarding the procedure for processing personal data and the measures taken to ensure their security.

1.2. This Policy has been developed in accordance with the Constitution of the Russian Federation, Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" (hereinafter - Federal Law No. 152-FZ), including the requirements for the protection of personal data set out in Chapter 4 of that law, and Federal Law No. 149-FZ of July 27, 2006 "On Information, Information Technologies and the Protection of Information".

1.3. This Policy is published in open access on the Internet via the Service in accordance with Part 2 of Article 18.1 of Federal Law No. 152-FZ.

1.4. The Administration does not create databases of personal data containing information that allows a data subject to be uniquely identified (full name, passport data, INN, SNILS, etc.). The only identifier provided by the User is the email address used for registration and account login, and also - where the User has given separate consent - for sending marketing (advertising) messages in the manner provided for by this Policy.

1.5. Use of the Service constitutes the User's unconditional acceptance of this Policy and the conditions set out herein. If the User does not agree with the terms of the Policy, the User must refrain from using the Service.

2. Key Terms

2.1. Personal data - any information relating, directly or indirectly, to an identified or identifiable natural person (the data subject) (Clause 1, Article 3 of Federal Law No. 152-FZ).

2.2. 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 the collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data.

2.3. Automated processing of personal data - the processing of personal data using computing technology.

2.4. Operator - a state body, municipal body, legal entity, or natural person that, alone or jointly with others, organizes and/or carries out the processing of personal data, as

well as determines the purposes of processing, the composition of the personal data to be processed, and the actions (operations) performed with the personal data.

2.5. Depersonalization of personal data - actions as a result of which it becomes impossible, without the use of additional information, to determine the attribution of personal data to a specific data subject.

3. Composition of the Information and Personal Data Processed

3.1. Upon registration in the Service, the User voluntarily provides an email address. This address is used to identify the User within the Service and to provide access to the User's account, and also - where the User has given separate consent - to send marketing (advertising) messages.

3.2. The Administration automatically receives and records depersonalized technical data transmitted by the User's device when visiting the Service, including via cookie files and the "Yandex Metrika" web analytics service. Such data may include:

- IP address (in depersonalized form);
- browser type and version, operating system;
- date and time of visit, pages viewed;
- source of the transition to the Service;
- other depersonalized technical parameters.

3.3. The Administration does not collect, store, or process: surname, first name, or patronymic; passport data; INN; SNILS; address of registration or residence; telephone number; bank card data; biometric personal data, or any other data allowing the User to be uniquely identified without recourse to additional sources.

3.4. Depersonalized technical data (cookies, analytics data) do not, by themselves, allow a specific natural person to be determined without the use of additional information.

4. Legal Grounds for Processing Personal Data

4.1. The legal grounds for processing personal data are:

- the consent of the data subject to the processing of their personal data (Clause 1, Part 1, Article 6 of Federal Law No. 152-FZ), expressed through acceptance of this Policy upon registration in the Service;
- the necessity of processing for the performance of a contract (the agreement on the use of the Service) to which the data subject is a party (Clause 5, Part 1, Article 6 of Federal Law No. 152-FZ);
- the data subject's separate consent to receive advertising (marketing) messages - with respect to the processing of the email address for those purposes (Clause 1, Part 1, Article 6 of Federal Law No. 152-FZ; Article 18 of Federal Law No. 38-FZ of March 13, 2006 "On Advertising").

5. Purposes of Processing Information and Personal Data

5.1. Information and personal data are processed by the Administration for the following purposes:

- ensuring the operation of the Service and providing the User with access to its functional features;

- registering the User and identifying the User upon account login;
- sending service notifications directly related to the functioning of the Service and the User's account;
- improving the quality of the Service on the basis of depersonalized analytics data and analyzing user behavior in depersonalized form;
- sending the User marketing (advertising) messages about the Service, its updates, promotions, and special offers - where the User has given separate consent;
- ensuring the security of the Service and preventing unauthorized access.

5.2. Marketing (advertising) messages are sent only where the User has given prior separate consent expressed through an affirmative action (for example, by ticking the relevant box). Such consent is voluntary and is not a condition for registration or use of the Service. The User may opt out of receiving marketing messages at any time by using the unsubscribe link in the message, changing the account settings, or sending a request to the Administration's email address. Opting out of marketing messages does not affect the User's ability to use the Service or to receive service notifications.

5.3. Personal data are processed until the purposes of processing set out in this Policy are achieved, or until the User withdraws consent to processing.

6. Procedure and Conditions for Processing Personal Data

6.1. Personal data are processed using automation tools.

6.2. The Administration ensures the confidentiality of personal data in accordance with Article 7 of Federal Law No. 152-FZ and does not disclose them to third parties without the data subject's consent, except in cases provided for by federal law.

6.3. The transfer of information and personal data to third parties is permitted in the following cases:

- the User has given explicit consent thereto;
- the transfer is provided for by federal law or another regulatory legal act of the Russian Federation;
- the transfer is made pursuant to a reasoned request from authorized state bodies in the manner established by the legislation of the Russian Federation;
- the transfer is necessary to protect the rights and legitimate interests of the Administration or third parties, including in cases where the User violates the terms of use of the Service.

6.4. Personal data are stored for the period necessary to achieve the purposes of processing, but no longer than the period of existence of the User's account. After the account is deleted, the information is destroyed within a period not exceeding thirty days.

7. Cookie Files

7.1. The Service uses cookie files - small text files placed on the User's device to ensure the correct operation of the Service and to collect depersonalized analytics information.

7.2. The User has the right to disable or restrict the use of cookie files in their browser settings. In this case, some functions of the Service may become unavailable.

7.3. Data obtained through cookies do not allow the User to be identified and are used solely for statistical and analytical purposes in depersonalized form.

8. Yandex Metrica

8.1. The Service uses the “Yandex Metrica” web analytics service provided by Yandex LLC (16 Lva Tolstogo St., Moscow, 119021, Russia). Yandex Metrica uses cookie files to analyze Service traffic. The counter IDs are 108803105, 108803121.

8.2. The following Yandex Metrica features are enabled on the counter:

- Session Replay (Webvisor) - recording of the User's actions on the Service's pages (cursor movement, clicks, scrolling, data entry into forms) for subsequent analysis in depersonalized form. By default, Session Replay does not record the contents of fields with the password type, or of elements with attributes that hide them from recording in accordance with the Yandex Metrica documentation;
- Click Map - depersonalized statistics of the places where Users click on the Service's pages;
- Link tracking - recording of transitions via external and internal links of the Service in depersonalized form;
- Accurate Bounce Rate - assessment of engagement based on the time spent on a page.

8.3. The collected data are processed by the “Yandex Metrica” service in depersonalized form in accordance with the Privacy Policy of Yandex LLC. The Administration does not transfer Users' personal data to Yandex LLC and does not use Session Replay recordings to identify any specific individual.

8.4. The User may opt out of data collection by Yandex Metrica in one of the following ways:

- install the official “Yandex Metrica Blocker” browser plugin;
- disable cookies or enable the “Do Not Track” mode in the browser settings;
- use browser extensions that block third-party analytics scripts.

9. Measures to Ensure the Security of Personal Data

9.1. The Administration takes the necessary and sufficient legal, organizational, and technical measures to protect Users' information and personal data against unlawful or accidental access, destruction, modification, blocking, copying, provision, distribution, and other unlawful actions with respect to personal data, in accordance with Article 19 of Federal Law No. 152-FZ, including:

- the use of secure data transmission channels (the SSL/TLS protocol);
- restricting the range of persons with access to personal data; access to Users' email addresses is granted solely to authorized persons of the Administration;
- the application of information protection tools against unauthorized access;
- regular monitoring and auditing of compliance with personal data protection measures.

10. Rights of the Data Subject

10.1. The data subject (the User) has the right to:

- obtain information concerning the processing of their personal data, in the manner provided for by Article 14 of Federal Law No. 152-FZ;
- require the clarification of their personal data, the blocking, or the destruction thereof if the personal data are incomplete, outdated, inaccurate, unlawfully obtained, or not necessary for the stated purpose of processing;
- require the deletion of their account and the associated email address;
- withdraw consent to the processing of personal data by sending a corresponding notice to the Administration;
- exercise other rights provided for by the legislation of the Russian Federation.

10.2. To exercise the above rights, the User may send a request to the email address: help@aiturbo.org. The Administration is obliged to provide a response within a period not exceeding thirty days from the receipt of the request (Part 4, Article 14 of Federal Law No. 152-FZ).

10.3. In the event that the User withdraws consent to the processing of personal data, the Administration is obliged to cease processing them or to ensure that such processing ceases and, if the retention of the personal data is no longer required for the purposes of processing, to destroy the personal data or ensure their destruction within a period not exceeding thirty days from the receipt of the said withdrawal (Part 5, Article 21 of Federal Law No. 152-FZ).

11. Liability

11.1. The Administration is not liable for the actions of third parties who have gained access to the User's information as a result of the User's own actions (including the transfer of the account password to third parties).

12. Final Provisions

12.1. This Policy is valid indefinitely until replaced by a new version.

12.2. The legislation of the Russian Federation applies to this Policy and to the relations between the User and the Administration.

12.3. All possible disputes arising from this Policy are resolved in accordance with the current legislation of the Russian Federation at the location of the Administration.

12.4. The Administration has the right to make changes to this Policy. The current version of the Policy is published on the Service at <https://app.aiturbo.org> and takes effect from the moment of its publication.

12.5. Continued use of the Service after changes have been made to the Policy constitutes the User's consent to such changes.

12.6. For all questions related to this Policy, the User may contact the email address: help@aiturbo.org.

Individual Entrepreneur Marat Anvarovich Shabaev