



VDSCOM Ltd
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Privacy Policy

This privacy policy (hereinafter referred to as the Policy) describes how VDSCOM LLC (hereinafter referred to as VDSCOM) processes personal data, what rights are granted to you in connection with such processing.

POLICY LIMITS

This Policy applies to (collectively - VDSCOM Services):

software products, the exclusive rights to which belong to VDSCOM, copies of which are provided for download and installation, as well as SaaS software products used online through interactive interaction with their functional part (hereinafter referred to as Software Products); Personal account in the secure part of the site my.vdsc.com (Hereinafter - Personal Account); VDSCOM sites and their subdomains (hereinafter referred to as Sites); related services and services. For example, to the registration of SSL certificates, webinars, conferences, contests (hereinafter - Related services); requests to technical support, other departments and online chat (hereinafter referred to as Requests); processing data related to employment.

If you do not agree with this Policy, do not use the VDSCOM Services.

This Privacy Policy does not apply to:

- services of third-party developers or suppliers, platforms, social networks, services that may be available through the VDSCOM Services or integrated with them, as well as links to them (hereinafter referred to as Third-Party Services). For example, when paying, you can be redirected to the site of the payment system. You can also leave a comment on the Sites using the integrated comment service. Data processing in these cases is outside the control of VDSCOM. These Third Party Services are independent data processors and operate under their own privacy policies.
- third party services that use VDSCOM Software, such as web hosting. In this case, your personal data is processed directly by the web hosting provider.

Special rules that clarify the provisions of this Policy may be contained in the rules, contracts, regulations that determine the conditions for the provision of VDSCOM Services. You need to carefully read and agree with these documents.

LEGAL BASIS FOR PROCESSING PERSONAL DATA

The processing of personal data is carried out in accordance with the requirements of the legislation of the Russian Federation (hereinafter referred to as the Applicable legislation):

The Civil Code of the nited States of America;

Labor Code of the United States of America;

COLLECTED INFORMATION

VDSCOM may process personal data and other information (including anonymized) that is not directly related to personal data. For example, technical characteristics of devices, connections, error reports, ways of interacting with interfaces (hereinafter - Additional data).

VDSCOM obtains information from the following sources:

1. Personal data provided by users.

The user provides such information when he registers on the Sites, sends Requests, buys Software Products, uses his Personal Account and Related Services. This data is necessary for VDSCOM to fulfill obligations, make payments, fulfill tax obligations, defend against claims and claims. These include surname, name, patronymic, e-mail address, registration address, payment details, phone number. Depending on the content of the obligations, the provision of other personal data may be required. VDSCOM does not collect and store payment card data.

VDSCOM has the right to use the mechanism of a single authorization center, in which access to all or certain VDSCOM Services will be provided using uniform User credentials.

2. Additional data processed when using the Software Products, Sites, Personal Account and Related Services:

1. Log data. Our servers automatically record technical information about access to them. This happens when you open the Site, receive the Software Product, use your Personal Account or Related Services. Log data can contain IP address, browser characteristics, date, time, duration and sequence of actions.
2. Usage data. VDSCOM collects information about how you have used the VDSCOM Services to improve your experience. Such data may include device type, operating system version, technical error reports, quantitative parameters of use. The dataset is defined by the VDSCOM Service type.
3. IP addresses of servers on which the Software products are installed, license IDs. To protect the Software Products from unauthorized copying, the actual IP address is checked for compliance with what you specified when concluding the license agreement (in your Personal Account), as well as the license ID.
4. Cookies. VDSCOM uses cookie technology (and similar ones) by which information is collected. More information in the Cookie Policy.
5. Data provided to VDSCOM by third parties. In most cases, you are free to authorize, deny, or restrict third party disclosures. For example, you can log into the Sites using social networks. In this case, you independently authorize the social network to provide VDSCOM with your email address, name or other information. VDSCOM cannot receive any information on its own, if you have not allowed it in the settings of the social network.

VDSCOM does not process special categories of data: biometric data, information about political, religious beliefs, convictions, health status and other similar data.

VDSCOM strongly recommends not to provide personal data on forums and other public sections of the Sites. VDSCOM does not carry out obligatory moderation of the entered data and is not responsible in case of their public disclosure.

HOW VDSCOM USES PERSONAL DATA

VDSCOM uses personal data strictly in accordance with applicable law and the purposes for which the data is collected.

When processing personal data, VDSCOM proceeds from the following principles:

The processing of personal data is carried out on a legal and fair basis; The processing of personal data is limited to the achievement of specific, predetermined and legitimate goals, and the content and volume of the processed data should not be excessive. Processing of personal data that is incompatible with the purposes of collection is not allowed;

It is not allowed to combine databases containing personal data, the processing of which is carried out for purposes incompatible with each other;

Only personal data that meet the purposes of their processing is subject to processing; When processing personal data, the accuracy of personal data is ensured, their sufficiency and relevance in relation to the purposes of processing personal data, and, if necessary, the necessary measures are taken to delete or clarify incomplete or inaccurate data;

Storing personal data for no longer than the purpose of processing personal data requires;

Ensuring security from unauthorized or illegal processing, as well as from accidental loss, damage or destruction.

Personal data is used by VDSCOM for:

1. Fulfillment of mutual obligations of VDSCOM and the user on the basis of contracts, conditions for the provision of VDSCOM Services.
2. Compliance with legal requirements. For example, in order to comply with tax legislation.
3. Making payments, managing and administering accounts, controlling payments.
4. Protection against copyright infringement, fraud and other unfair behavior.
5. Improvements, support, modernization of the VDSCOM Services. Such processing is necessary to prevent and correct errors, ensure security, fix technical problems, and analyze and monitor usage.
6. Interactions with the user, such as responses to inquiries and direct contacts regarding the installation, configuration and purchase of VDSCOM Services. For this, the data provided by the user when ordering the VDSCOM Services, as well as data from open sources, are used.
7. Mailing of mail and other types of communications. At the same time, VDSCOM can send several types of messages (including email, SMS, Messages in your personal account). System messages are required for the timely fulfillment of VDSCOM's obligations to the user. They are necessary for the operation of the VDSCOM Services. Such notifications include messages about the status of services, payments, password changes and other similar issues. Marketing and promotional messages are sent only if the user has given explicit consent to receive them. You can always configure the receipt of such messages in your Personal Account.
8. Conducting research using anonymized data.

When processing data for the purposes specified in clauses 4-8 - with the exception of marketing and advertising messages - VDSCOM proceeds from the existence of a justified legitimate interest.

DATA STORAGE

VDSCOM stores data for the time necessary for the purpose of collecting it.

Upon achievement of the processing goals or in case of loss of the need to achieve these goals, as well as in the event of a corresponding request, the data must be destroyed or depersonalized.

Despite the user's request to delete the information, VDSCOM has the right to store the information if this is necessary for legitimate business interests, the fulfillment of obligations and the resolution of disputes.

INFORMATION DISCLOSURE

VDSCOM discloses information to third parties only in cases provided for by this policy or applicable law, and only to the extent necessary based on the purpose of the disclosure.

Thus, disclosure is allowed:

- Supplementary service providers on behalf of VDSCOM. For example, services that produce email newsletters, monitoring activity on the Sites, sub-executors, licensors. Such providers will only use personal data in accordance with the instructions of VDSCOM and for the purposes specified in this Policy. For more information on the limits of disclosure and the persons to whom data may be disclosed, see Processors.
- When instructed by the user. In particular, the instruction of the user will mean, among other things, the creation by the User in the Personal Account of a proxy and granting him access rights to the relevant information.
- In order to comply with applicable laws. So, the data can be disclosed in the event of a request from the competent authority.
- Affiliates of VDSCOM in order to fulfill the obligation to the user. Affiliates are subject to disclosure under Processors.
- In order to prevent illegal actions, protect the rights and ensure the safety of VDSCOM and other persons, to protect against claims and lawsuits.
- When transferring information during the reorganization of VDSCOM, as well as the conclusion of agreements on the transfer of rights under contracts. In this case, VDSCOM has the right to disclose information to the person acquiring rights under the contracts, as well as to the person who is formed as a result of the reorganization.
- Generalized, aggregated and non-personalized data. VDSCOM may disclose non-personalized statistical data, for example, about the most frequently used functions of the Software Products.
- Otherwise, upon receipt of the user's consent.

SAFETY

In order to protect the data of VDSCOM, serious technical and organizational measures are taken. In particular:

- a person responsible for organizing the processing of personal data has been appointed;

- local acts on the processing of personal data were approved. They establish procedures for the prevention and detection of violations, elimination of the consequences of such violations;
- legal, organizational and technical measures are applied to ensure the security of personal data during their processing;
- periodic checks of the conditions for the processing of personal data are carried out; the
- employees directly involved in the processing of personal data are familiarized with the provisions of the legislation on personal data, including the requirements for the protection of personal data, documents, and other internal documents on the processing of personal data.

VDSCOM cannot guarantee that information, during its transmission over the Internet or during storage, will be absolutely protected from intrusions. In doing so, VDSCOM applies pseudonymisation and data encryption wherever possible.

AGE RESTRICTIONS

VDSCOM does not specifically process the personal data of persons under the age of 14.

If you believe that VDSCOM may have received personal data from a person who has not reached the age from which he can provide independent consent to processing, inform VDSCOM about this using one of the methods described in the DEFINITION OF DATA OPERATOR section. CONTACT INFORMATION".

POLICY CHANGES

VDSCOM has the right to make changes to this policy taking into account changes in legislation, business processes. All changes are subject to publication on the VDSCOM Website. In the event that changes directly or indirectly affect the rights of users, VDSCOM will send notifications to users by e-mail and / or using the Personal Account and Software Products.

LOCATION OF DATA PROCESSING, INTERNATIONAL TRANSFER

VDSCOM provides collection of personal data and their processing using databases located on the territory of the United States of America.

The VDSCOM can transmit data to processors specified in the associated application outside the location of the VDSCOM. At the same time, the Processors will ensure a level of data protection not less than that established by this Policy.

DEFINITION OF THE DATA OPERATOR. CONTACT INFORMATION

The data controller (operator) is: VDSCOM Ltd

2093 PHILADELPHIA PIKE #5770 CLAYMONT, DE 19703 US. Any requests related to data processing should be sent by e-mail info@vdscom.ru and also in writing to VDSCOM.

VDSCOM will strive to consider incoming applications as soon as possible, but in any case no more than one month.

RIGHTS OF THE DATA SUBJECT

The user is guaranteed the observance of his rights in accordance with the Applicable legislation and recognized norms of international law.

The user has the right to:

- Withdrawal of consent to the processing of personal data (if the processing is based on consent). For example, by agreeing to receive advertising or marketing information, you can always unsubscribe in your Personal Account.
- Obtaining information about the processing of personal data. By keeping this policy up-to-date, VDSCOM ensures that you receive accurate information about the data collected, the purposes of processing and other aspects of processing.
- Access to information, its updating, modification, clarification of information. In most cases, the state of your information is managed in your Personal Account. Right to object to processing. The user has the right to object to the processing of his personal data for direct marketing purposes.
- Right to restriction of processing. Such a right is allowed only in strictly defined cases, such as, for example, challenging the accuracy of the data (during the period of data clarification), establishing the unlawfulness of the processing. In the event of a declaration of restriction of processing, VDSCOM is not entitled to carry out any kind of processing without the consent of the user. However, without such consent, the processing necessary to defend against claims and claims may be carried out.
- The right to export data and, if technically applicable, to import. Such a right can be exercised by the user at his request in the Personal Account. Data export is performed in CSV format.
- Right to Erasure. VDSCOM has the right to continue processing data upon receipt of a request, if permitted by applicable law.

Other additional rights may be granted by applicable law.

VDSCOM PROCESSORS

VDSCOM may engage subcontractors, service providers and service providers (hereinafter referred to as Processors) in order to fulfill obligations to users, as well as in order to ensure its legitimate interests.

A strictly limited set of data is transferred to processors, which is necessary for the execution of their functions. Before engaging a processor, VDSCOM will take all reasonable steps to ensure the confidentiality of data transmission. In this section, VDSCOM discloses such individuals, their location and function.

Name	Function performed	Country of location
Google Inc.	web analytics	USA
Yandex LLC	web analytics	Russia

COOKIE POLICY

This section defines how, when and for what purpose VDSCOM uses cookies and similar technologies. Terms and definitions in this section are used in the meaning specified in the Privacy Policy.

By continuing to use the VDSCOM Services, you agree to the use of cookies and similar technologies in accordance with this document and the Policy

confidentiality. If you do not want these technologies to be used, make the settings as described in the HOW TO DISABLE COOKIE section.

WHAT IS A COOKIE

Cookies are small text files that are stored on a computer or mobile device when using the Sites and Personal Account. Each Cookie is unique for each account or browser.

WHAT COOKIE DOES VDSCOM USE?

VDSCOM uses cookies and similar technologies such as pixel and web beacon. As a rule, a gif file of 1 pixel in size, when you open it, you can get information, for example, about the technical parameters of the connection.

VDSCOM uses both session and persistent cookies. Session cookies are only created while your internet browser is open and are automatically deleted when you close it. Persistent cookies are created for the period until they are automatically deleted or the expiration date specified in such cookies.

VDSCOM also uses Cookies that are set by third parties, for example, analytical systems such as Yandex.Metrica, Google Analytics.

Some Cookies are associated with your account and allow you to log in. Other Cookies are not associated with an account, but being unique, they allow you to ensure the preservation of settings, interface elements, preferences, and choices.

Cookie allows you to use all the features of the Sites and the Personal Account.

Also, Cookies differ in the way they are used. VDSCOM uses several of these cookies.

Way of use	Description
Authorization	If you have entered credentials on the Site, a cookie allows you to retain the ability to navigate from one page to another while maintaining access to protected areas. Without these files, the site may not work correctly.
Security provision	These cookies, in particular, help to identify unfair behavior and the use of bots.
Settings, processes	Cookies store information about the language you use, filling out forms, and the state of the system.
Marketing	Cookies can be used to implement marketing campaigns (for example, display ads) and analyze their effectiveness. Cookies can also be used in mailing lists to analyze the opening, reading of letters, clicking on links in them. If you live in European countries, you can turn off the display of advertisements of some advertising systems, for example, using the services http://www.aboutads.info/choices/ , http://www.youronlinechoices.eu/
Stability improvements, analytics and development	Cookies that help collect and analyze information about how users interact with the Site and Personal Account. It is not identifying.

HOW TO DISABLE COOKIE

Most modern browsers provide users with the ability to manage security settings. In particular, the user can prevent the storage and use of cookies, set up exceptions for trusted sites.

The settings for each browser are contained in the documentation.

The opt-out of third-party cookies, such as Google Analytics, can be done on the Google website. Also, the restriction on the use of "pixels", "web beacons", for example, social networks, can be made in the security settings of social networks.

In the event that you restrict the use of cookies, the normal functioning of the VDSCOM Services may be impaired. For example, settings may not be saved, authorization is broken or it may not be performed, messages may not be sent, or the Software Products may not work correctly.

VDSCOM shall not be held liable in the event that the VDSCOM Services cannot be used due to the restriction of the use of cookie technology.

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Approved by: Management of VDSCOM Ltd

