PERSONAL DATA PROCESSING POLICY

This document describes how RBS LLC (INN: 7728875882, referred to as "we", "us", "our") processes personal data of visitors to our website: <u>https://zaleycash.com/</u> For questions about personal data processing, you may contact us:

- At our legal address: 117463, Moscow, Novoyasenevsky Prospekt, Building 32, Block 1, 1st Floor, Room VI, Office 60
- Via email: info@zaleycash.com

We prioritize your privacy and personal data security. Please review this Policy carefully to understand our data processing purposes and your rights.

About Personal Data and Your Rights

Personal data - any information directly or indirectly identifying you.

Data operator - legal entity processing personal data. When you visit our site, we become your data operator.

Data processing - any action performed with personal data.

Under Federal Law No. 152-FZ, you have rights to:

- Access your data
- Correct your data
- Block or delete your data
- Object to our actions/inaction
- Challenge automated decisions
- Withdraw processing consent

Exercising Your Rights

You may submit a written request to our address (above) including:

- Your ID details
- Full name (yours or representative's)
- Nature of relationship with us
- Signature

Requests may also be emailed with valid digital signature per Russian law. Complaints may be filed with your local Roskomnadzor office.

Processing Purposes

We collect, record, systematize, store, update, use, transfer, block, delete, and destroy personal data for:

- 1. Creating User Accounts
 - o Data collected: Name, email, Telegram username, company info, phone
 - Legal basis: User Agreement (Article 6(5) of 152-FZ)
 - Retention: Until account deletion + 30 days
- 2. Processing Support Requests
 - Same data as above

- \circ Automated processing
- Retention: Until request completion + 30 days

3. Consultation Requests

- o Data collected via contact forms
- Legal basis: Consent (Article 6(1))
- Retention: Until interaction ends + 30 days

4. Phone/Email Inquiries

- o May collect: Full name, email, Telegram, company, phone
- Legal basis: Legitimate interest (Article 6(7))
- Retention: Until query resolution + 30 days

5. Marketing Communications

- Data collected: Name, email, Telegram, company, phone
- Legal basis: Consent
- Retention: Until unsubscribed + 30 days

Website Analytics

We use cookies (necessary, statistical, marketing) and tracking technologies to collect:

- IP address
- Location
- Device/OS/browser details
- Language preferences
- User behavior data

Key cookies used (Yandex):

- ym_d (1 year) first visit date
- ym_isad (20 hrs) ad blocker detection
- ym_visorc (1 day) session actions
- ym_uid (1 year) behavior analytics

Third-Party Data Sharing

We share data with:

- Yandex (analytics)
- 1C-Bitrix (CRM)
- AmoCRM (CRM)
- Carrot Quest (marketing)
- UniSender (email)
- Rafinad (payments)
- MediaScout (ad tracking)
- VK (advertising)

Data Security

We implement technical and organizational measures to protect against loss, alteration, or unauthorized access per Russian law.

Policy Changes

We may update this Policy periodically. Significant changes will be notified through available channels.