

Privacy and Personal Data Processing Policy

This Privacy Policy defines the procedure for processing and protecting personal data of users of the website itransfers.ru (hereinafter referred to as the "Website"), in accordance with Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006, as amended on May 30, 2025.

1. General Provisions

By using the Website, you (the user) confirm that you have read this Policy and voluntarily consent to the processing of your personal data, technical information, and behavioral data on the Website.

2. Personal Data Operator

iTransfers LLC, registered at: 153 Leninsky Avenue, Premises 216-N, Office 706, St. Petersburg, 196247, Russia (hereinafter referred to as the "Company"), is the personal data operator and notifies Roskomnadzor of the commencement of personal data processing in accordance with Article 22(1) of Federal Law No. 152-FZ.

3. Types of Personal Data Processed

The Company may collect the following categories of data:

- Name, phone number, email address, and other data provided in forms;
- Technical data: IP address, device and browser type, language, date and time of access, URLs of requested pages;
- Behavioral data on the Website (clicks, time on page, scrolling, and other interactions);
- Special categories of data (if required) — only with separate consent and in accordance with Russian law.

4. Legal Grounds for Processing

Processing is carried out based on:

- The data subject's consent;
- Necessity for contract performance (provision of services);
- The operator's legitimate interests (service quality improvement, marketing, analytics).

5. Purpose of Personal Data Processing

- Provision of requested services;
- Improving Website performance and user experience;
- Conducting marketing and promotional activities;
- Personalization of content and advertising;
- Development of new products and services.

6. Cookies and Behavioral Data Collection

The Website uses only technically necessary cookies that ensure basic functionality (e.g., session maintenance and interface operation). These cookies do not identify users and are not shared with third parties.

We do not use third-party analytics systems or advertising trackers. You may disable cookies in your browser settings, but this may affect some site functionality.

7. Data Localization and Cross-Border Transfer

The processing and storage of personal data of Russian citizens is carried out exclusively within the territory of the Russian Federation. Cross-border transfer is only possible with the data subject's separate consent and notification to Roskomnadzor in accordance with Article 12(12) of Federal Law No. 152-FZ.

8. Data Retention and Deletion

Data is stored until the purpose of processing is achieved or consent is withdrawn. Upon a written request from the user, data will be deleted or anonymized. In case of a personal data breach, the Company undertakes to notify Roskomnadzor and affected data subjects within 24 hours of detection.

9. Data Sharing with Third Parties

Data may be shared with affiliates and contractors of the Company solely for the purposes set out in this Policy and in accordance with confidentiality principles:

- CRM systems (e.g., amoCRM) for processing inquiries, arranging and supporting transactions;
- Email marketing services (e.g., Unisender) for sending informational and promotional messages — only with the user's separate consent.

Data transfer is carried out in compliance with Russian law, including obtaining explicit user consent where required.

10. Data Protection Measures

The Company implements sufficient technical and organizational measures to protect personal data from unauthorized access, modification, distribution, and destruction. A dedicated Data Protection Officer is appointed. Internal data protection regulations and procedures are in place. Personal data security is regularly assessed through internal audits at least once per year.

11. Liability and Penalties

The Company informs users of potential liability under Russian law:

- Fines up to 300,000 RUB for failure to notify the start of data processing;
- Up to 15 million RUB for data breaches;
- Up to 20 million RUB or 1–3% of the Company's annual turnover for repeated or large-scale violations.

12. Contacting the Operator

For questions related to data processing, deletion, or suggestions to improve this Policy, please contact: info@itransfers.ru.

13. Final Provisions

All other matters related to the processing and protection of personal data are governed by the applicable laws of the Russian Federation, including the Federal Law "On Personal Data" and the Federal Law "On Commercial Secrets."