
Privacy and Personal Data Processing Policy

Version dated 28 October 2026

1. General terms

- 1.1. The personal data operator is Vladimir Vladimirovich Ivanov (the Operator).
- 1.2. This Policy describes how personal data is processed when a user visits or uses the website and its features, including registration, the user account, catalogue, subscription checkout and payment, favorites, and user enquiries.
- 1.3. It explains the categories and purposes of processing, legal grounds, retention periods, safeguards, and user rights.
- 1.4. The Operator processes data for specific lawful purposes, in the amount needed for those purposes, and no longer than necessary or required by law.
- 1.5. Third-party websites and payment services may process data under their own policies. This Policy does not govern their independent processing.

2. Data processed

- 2.1. When an account is created and used, the Operator may process the email address, internal user ID, password hash, session and account security data, selected language, and user settings.
- 2.2. To provide website features, the Operator may process information about favorite games and actions the user takes in the catalogue.
- 2.3. For a subscription, the Operator processes the selected plan, access term, invoice number, amount, invoice currency, payment date and status, and information needed to link the payment to the account.
- 2.4. When a user contacts support, the Operator may process the message, email address, and information the user voluntarily includes.
- 2.5. Analytics and technical tools may process an IP address, cookies, device and browser type, operating system, visit time, page addresses, referral source, on-site actions, and an approximate country or region of connection.
- 2.6. The Operator does not request special categories of personal data, such as data about health, political opinions, or religious beliefs. Please do not send such data unless it is necessary to handle your enquiry.

3. Purposes and legal grounds

- 3.1. Data is used to create and maintain accounts, authenticate users, and protect accounts from unauthorized access.
- 3.2. Data is used to provide website features, fulfil orders, manage subscriptions, account for payments, and send necessary messages about registration, security, and service status.
- 3.3. Technical data is used to operate and secure the website, prevent abuse, diagnose errors, and improve the user experience.
- 3.4. Analytics data is used to understand visits, referral sources, and use of website features.

3.5. The legal ground depends on the purpose and may include the user's consent, taking steps to enter into or perform a contract, legal obligations, and other grounds permitted by law. Where processing relies on consent, the user may withdraw it through the contact channel in Section 9.

4. Subscriptions and payments

4.1. Payments are processed by Robokassa. The Operator receives information needed to create an invoice, confirm payment, and provide the paid access.

4.2. The Operator processes the invoice number, amount, plan, payment status and time, and the internal link between the payment and the user account.

4.3. Full bank card details, CVC/CVV codes, PINs, and online banking passwords are not submitted to the Operator through the website. The payment service processes those details under its own rules.

4.4. The payment service may process payer and transaction data under its own documentation and applicable law.

5. Cookies and Yandex Metrica

5.1. The website uses necessary cookies to operate user accounts and remember certain settings. Yandex Metrica is used to analyze visits and use of the website.

5.2. Metrica settings include referral and page-action analysis, click maps, and Webvisor. The service may process technical identifiers, browser and device information, pages viewed, referral sources, and approximate geography.

5.3. Users can restrict or disable cookies in their browser settings. This may affect account sign-in and some website features.

6. Recipients and third-party services

6.1. To operate the website and provide services, data may be made available as necessary to hosting and data-storage providers, an email delivery service, Robokassa, and Yandex Metrica.

6.2. The Operator does not sell personal data. Any disclosure is limited to the purposes in this Policy and the applicable legal grounds.

6.3. Data is disclosed to public authorities only where and as required by law.

6.4. When following an external link, the user interacts with the independent operator of that service. Please review its policy before submitting data.

7. Retention and deletion

7.1. Account data is retained while the account is in use and for as long as needed to fulfil the Operator's contractual and legal obligations.

7.2. Order and payment records are retained as needed to account for transactions, resolve disputes, and comply with legal requirements.

7.3. Support enquiries are retained for as long as needed to respond and protect the parties' rights.

7.4. When the purposes are fulfilled, data is deleted or anonymized unless the law requires further retention. Data processed solely on the basis of consent is handled in light of its withdrawal and any other lawful grounds.

8. Data security

8.1. The Operator uses reasonable organizational and technical safeguards to protect data against unauthorized access, alteration, disclosure, loss, or destruction.

8.2. Access is limited to people and services that need the data to operate the website, fulfil an order, or provide support.

8.3. If an incident is identified, the Operator takes response measures and acts in accordance with applicable law.

9. User rights and requests

9.1. Where provided by law, a user may request information about processing, ask to correct, block, or delete data, withdraw consent where processing relies on consent, and complain to a competent authority or court.

9.2. Withdrawing consent does not affect the lawfulness of processing performed before withdrawal. The Operator may continue processing where another lawful ground applies.

9.3. A request may be sent through the contact channel published separately. It should allow the Operator to identify the requester and understand which data or action is concerned.

9.4. To protect data, the Operator may request information reasonably needed to verify the requester's identity. Requests are handled within the periods set by applicable law.

10. External links and other people's data

10.1. A user must not provide another person's personal data to the Operator without a lawful basis and, where required, that person's consent.

10.2. Third-party resources linked from the website are responsible for their own data processing.

11. Changes to this Policy

11.1. The Operator may update this Policy when website features, service providers, processing methods, or applicable law change.

11.2. A new version takes effect when published unless it states another date. If a change requires separate consent, the Operator will request it as required by law.

12. Operator details

Personal data operator: Vladimir Vladimirovich Ivanov. INN: 732592273125.

Contact details for personal data enquiries are published separately.