

Personal Data Processing Policy

1. General

This Personal Data Processing Policy (the “Policy”) is developed based on the requirements of the Russian Federal Law No.152-FZ “On Personal Data” of 07.27.2006. Policy determines the order of personal data processing and actions to secure personal data of Pitch LLC (the “Operator”).

1. Implementation of The Operator’s personal data processing activity is aimed to observe person and citizen rights and liberties in the processing of personal data, including the protection of the rights to privacy, personal and family secrets.
2. The Policy applies to all information that the Operator can receive about Users of the website <http://pitch.ru>.

2. Key terms and definitions

1. “Automated personal data processing” is personal data processing via PC software;
2. “Personal data blocking” is temporary interruption of personal data processing (except where processing is required for personal data update or alteration);
3. “Website” is a set of graphic and information materials, as well as computer programs and databases, ensuring their availability on the Internet at the <http://pitch.ru>;
4. “Personal data information system” is the set of personal data is contained in databases, information technologies and technical facilities ensuring personal data processing;
5. “Personal data depersonalization” is the set of actions makes impossible

identifying personal data as related to a certain User or data subject without using an additional information.

6. "Personal data processing" is an action (operation) or a set of actions (operations) performing with /without the use of automation tools, including the collection, recording, systematization, accumulation, storage, refinement (update, alteration), extraction, using, transferring (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;

7. "Operator" is a state authority, municipal authority, legal or private person severally or jointly organizing and/or processing personal data. The Operator Defines the aims of personal data processing, volume of personal data and actions (operations) performing with personal data;

8. "Personal data" is any information directly or indirectly related to specified or definable User of the website <http://pitch.ru>;

9. "User" is any visitor of the website <http://pitch.ru>;

10. "Personal data presentation" is a set of actions aimed at disclosure personal data to a particular person or a certain group of persons;

11. "Personal data distribution" is a set of actions aimed at disclosure personal data to uncertain group of persons (personal data transfer) or familiarization of unlimited number of persons with personal data, including public disclosure in media, information and telecommunication networks or providing access to personal data in some other way;

12. "Trans-border transfer of personal data" is a personal data transfer to a foreign state territory, a foreign authority, a foreign natural or foreign legal entity;

13. "Personal data destruction" is a set of actions resulting in personal data irrevocable elimination with an impossibility of further restoring personal data content in the personal data information system or resulting in destruction of personal data material sources.

3. The operator may process the following types of data

1. Surname, name, patronymic;
2. Email address;
3. Phone numbers;
4. Photos;
5. The site also collects and processes anonymized data about visitors (including cookies) using Internet statistics services (Yandex Metrika, Google Analytics, etc.).
6. All of the above terms and definitions (“the Policy”) merged by the general concept of “Personal Data”.

4. Purposes of personal data processing

1. The User’s personal data processing purpose is an User email informing and providing the User’s access to the services, information and / or materials of the website content.
2. The Operator also has the rights to notify User about new products and services, special offers and various events. The User can always refuse to receive informational messages by sending an email to the Operator email address info@pitch.ru with the topic “Refusal to notify about new products and services and special offers”.
3. Depersonalized User data collected with Internet statistics services is used to collect information about the User actions on the website, to improve the quality of the site and its content.

5. Legal basis for the personal data processing

1. The Operator only processes the User's personal data if the User filled out and / or sent special forms located on the site <http://pitch.ru>. Filling out the special forms and / or sending a personal data to the Operator is the User's acceptance with the Policy.
2. The Operator processes the impersonal data about the User if that allowed in the User's browser settings (the preservation of cookies and the use of JavaScript technology are enabled).

6. The order of collection, storage, transmission and other types of personal data processing.

The Operator ensures the personal data security by implementing the legal, organizational and technical actions according to the requirements of the current legislation in the field of personal data protection.

1. The Operator ensures the safety of personal data and makes all possible actions preventing access to a personal data by uncertain persons.
2. The User personal data will never be passed to third parties under any circumstances (except cases related to the current legislation execution).
3. In case of detection of personal data inaccuracies, the User can update them independently by sending the note "Updating personal data" to the Operator's email address info@pitch.ru
4. The time for personal data processing is unlimited. The User may withdraw his acceptance to the personal data processing at any time by sending the note "Withdrawal of consent to the processing of personal data" to the Operator's email address info@pitch.ru

7. Trans-border transfer of personal data

1. In case of the trans-border personal data transfer the Operator ensures that the corresponding foreign state provides reliable rights protection of the personal data subjects on its territory before this data transfer will be implemented.

2. Trans-border personal data transfer on the territory of foreign countries that do not rely above requirements can only be carried out with a written confirmation of the subject and / or contract implementation to which the subject of personal data is party.

8. Final

1. The User may receive any clarifications related to his personal data processing by contacting the Operator via email info@pitch.ru

2. This document will reflect any changes in the Policy. The Policy is valid indefinitely until the release of a new version.

3. The current version of the Policy is freely available on the website <http://pitch.ru/policy>.