

Personal Data Processing Policy

Effective Date: June 1, 2026

1. General Provisions

This Personal Data Processing Policy (the “Policy”) defines the procedures for the processing and protection of personal data of users of the TipsterLab website (the “Service”), as well as the measures taken to ensure the security of personal data.

This Policy has been developed in accordance with the Federal Law of the Russian Federation No. 152-FZ “On Personal Data” dated July 27, 2006, and other applicable laws and regulations of the Russian Federation.

By using the TipsterLab website, the user confirms that they have read this Policy and consent to the processing of their personal data in accordance with its provisions.

2. Personal Data Controller

The Personal Data Controller is:

Company Name: LLC “TIMA”

Tax Identification Number (INN): 7811811838

Primary State Registration Number (OGRN): 1257800097862

Registered Address: Office 409, Premises 10-N, Lit. A, 6 Avtogennaya Street, Nevskaya Zastava Municipal District, Saint Petersburg, Russian Federation

E-mail: info@tipsterlab.pro

3. Categories of Personal Data Processed

The Controller may process the following categories of personal data:

- first and last name;

- email address;
- telephone number (if provided);
- country of residence;
- preferred language;
- account information;
- subscription information;
- service usage history;
- IP address;
- Cookies;
- device information;
- browser technical data;
- information regarding user activity on the website.

The Controller does not intentionally process special categories of personal data relating to health, racial or ethnic origin, political opinions, religious or philosophical beliefs, or any other categories specified in Article 10 of Federal Law No. 152-FZ.

4. Purposes of Processing Personal Data

Personal data is processed for the following purposes:

- user registration;
 - providing access to the Service;
 - performance of contractual obligations under the Public Offer;
 - subscription management;
 - payment processing;
 - customer support;
 - improving the quality of the Service;
 - analyzing platform usage;
 - improving artificial intelligence algorithms;
 - fraud prevention;
 - compliance with applicable laws of the Russian Federation.
-

5. Legal Basis for Processing

Personal data is processed on the following legal grounds:

- the user's consent;
- performance of a contract;
- compliance with legal obligations;

- the Controller's legitimate interests, provided that the user's rights and freedoms are respected.
-

6. Processing Operations

The Controller may perform the following operations with personal data:

- collection;
 - recording;
 - systematization;
 - accumulation;
 - storage;
 - updating and modification;
 - use;
 - disclosure where required by law;
 - anonymization;
 - blocking;
 - deletion;
 - destruction.
-

7. Disclosure to Third Parties

Personal data may be disclosed only to the extent necessary for providing the Service, including to:

- payment service providers;
- hosting providers;
- cloud infrastructure providers;
- web analytics providers;
- email distribution services;
- governmental authorities where required by applicable law.

Disclosure of personal data is carried out only where there is a lawful basis for doing so.

8. Cross-Border Data Transfers

Where international cloud services or infrastructure providers are used, the Controller may transfer personal data across national borders in accordance with the applicable laws of the Russian Federation.

9. Data Retention

Personal data is retained only for as long as necessary to achieve the purposes for which it was collected or for the period required by applicable law.

Once the purposes of processing have been fulfilled, personal data will be securely deleted or anonymized unless otherwise required by law.

10. Data Security

The Controller implements appropriate technical and organizational measures to protect personal data, including:

- SSL/TLS encrypted connections;
- restricted employee access;
- modern information security technologies;
- regular data backups;
- continuous security monitoring.

However, no method of electronic transmission or storage is completely secure.

11. Rights of Data Subjects

Users have the right to:

- obtain information regarding the processing of their personal data;
 - request correction of inaccurate personal data;
 - request restriction, blocking, or deletion of personal data;
 - withdraw previously granted consent;
 - obtain information regarding recipients of their personal data;
 - lodge a complaint with the competent supervisory authority or seek judicial protection of their rights.
-

12. Cookies

The TipsterLab website uses Cookies and similar technologies.

Cookies are used to:

- ensure proper operation of the website;
 - authenticate users;
 - remember user preferences;
 - analyze website traffic;
 - improve security;
 - enhance the quality of the services provided.
-

13. Amendments to this Policy

The Controller reserves the right to amend this Policy at any time.

The updated version becomes effective upon publication on the TipsterLab website unless otherwise specified.

14. Contact Information

For any questions regarding the processing of personal data, please contact:

E-mail: info@tipsterlab.pro

Website: <https://tipsterlab.pro>