

Privacy Statement

What kind of personal data does AcademConsult LTD collect?

Personal data you give to us.

AcademConsult LTD collects and uses information which you provide to us.

When you fill in a contact form on our web sites:

<http://academconsult.ru>,
<http://academclass.ru>,
<http://corp.academclass.ru>,
<http://hospitalityschools.ru/>,
<http://mdx.academconsult.ru/>,
<http://школыдизайна.рф/>,
<http://uni.academconsult.ru/>,
<http://school.academconsult.ru/>,
<https://russia-study.ru/>

you are (as a minimum) asked for your name, phone number and email address so that we could contact you and answer your question.

If you need to get in touch with our customer service team, or reach out to us through other means (such as through social media, or communicating with University or School through us) we will collect information from you there too. We will collect information from you, including your display name and avatar if you choose one.

There are also other instances where you'll provide us with information. For example, if you're browsing with your mobile device, you can decide to enable AcademConsult LTD to see your current location or grant access to your contact details.

Personal data you give us about others.

Of course, you might not simply be applying for yourself. You may be applying on behalf of someone else. However, at this point we have to point out that it's your responsibility to ensure that the person or people you have provided personal data about are aware that you've done so, and have understood and accepted how AcademConsult LTD uses their information (as described in this Privacy Statement).

Personal data we collect automatically.

Even if you don't end up filling an application, when you visit our websites we automatically collect certain information. This includes your IP address, the date and time you accessed our services, the hardware, software or internet browser you use and information about your computer's operating system, like application versions and your language settings. We also collect information about clicks and which pages have been shown to you.

If you are using a mobile device, we collect data that identifies your mobile device, device-specific settings and characteristics, app crashes and other system activity. When you fill an application, our system registers through which means and from which websites you have made your reservation or entered the AcademConsult LTD websites.

Personal data we receive from other sources.

It's not just the things you tell us, though – we may also receive information about you from other sources. These include business partners, such as affiliate partners, and other independent third parties, and anything we get from them may be combined with information provided by you. For example, the AcademConsult LTD university or school Admission services are not only made available via AcademConsult LTD but are also integrated into services of affiliate partners you can find online. When you use some of these, you provide your personal data to our business partner, who then forwards your data to us. These service providers share payment information so we can administer and handle your University or School Admission, making sure everything goes as smoothly as possible for you.

We may also receive information about you to serve you more relevant advertisement for example additional cookie data made available to AcademConsult LTD by social media partners. When you link your

social media account to AcademConsult LTD social media account, personal data may be shared with AcademConsult LTD by that social media provider, but only when it's OK with you for them to do so.

Universities and schools may share information about you with AcademConsult LTD too – this may happen if you have support questions about your Admission, when disputes arise about an Admission (though naturally we don't like it when that happens).

Why does Academconsult LTD collect and use your personal data?

We use the information collected about you for various purposes. Your personal data may be used in the following ways:

- University or School Admission Service: First and foremost, we use your personal data to complete and administer your University or School Admission, which is pretty central to what we do as a company!
- Customer service: We provide international customer service from our office and we're there to help. Sharing your relevant details allows us to respond when you need us – including helping you to find appropriate Educational Program and responding to any questions you might have about your Educational Program or University or School you apply to (or any other queries, for that matter).
- Online groups: We may enable users to join and interact with each other through online groups or forums.
- Marketing activities: We use your information for marketing activities. These activities include:
 - Using your contact information to send you regular news of Educational Programs, Universities or Schools and other AcademConsult Ltd services. You can unsubscribe from email marketing communications quickly, easily and at any time by clicking on the "Unsubscribe" link included in each newsletter.
 - Based on your information, individualised offers may be shown to you on the AcademConsult LTD website or on third-party websites/apps (including social media sites) and the content of the site displayed to you may be personalized. These may be offers that you can book directly on the AcademConsult LTD site, or on co-branded sites, or other third-party offers or products we think you might find interesting.
 - When you participate in other promotional activities (such as sweepstakes, referral programs or competitions), relevant information will be used to administer these promotions.
- Communicating with you: There may be other times when we get in touch, including by email, by post, by phone or by texting you – which method we choose depends on the contact information you've previously shared with us. And we process the communications you send to us. There could be a number of reasons for this, including:
 - Responding to and handling any requests you have made. AcademConsult LTD also offers you and Universities or Schools various means to exchange information, requests, and comments about Universities or Schools and existing Educational Programs via AcademConsult LTD. For more information, scroll down a bit and read the section titled "How does AcademConsult LTD process communications that you and your university or school may send through AcademConsult LTD?".
 - If you have not finalized your Application online, we can contact you with a reminder to continue with your Application. We believe that this additional service benefits you as it allows you to carry on with an Application without having to fill in your Application details again.
 - When you use our services, we can send you a questionnaire or invite you to provide a review about your experience with AcademConsult LTD or the University or School.
 - We also send you other material related to your Applications, such as how to contact AcademConsult LTD if you need assistance while you are away, and information that we feel might be useful to you in planning or getting the best out of your Educational Program. We may also send you material related to upcoming Educational Programs or a summary of previous Educational Programs you applied for through AcademConsult LTD.
 - Even if you do not have an upcoming Educational Program, we may need to send you other administrative messages, which may include security alerts.

- Market research: We sometimes ask our customers to take part in market research. Please see the information provided when you are invited to participate to understand what personal data is collected and how your personal data is used further.
- Promotion of a safe and trustworthy service: In order to create a trustworthy environment for you, AcademConsult LTD's business partners and Universities or Schools, we may use personal data for the detection and prevention of fraud and other illegal or unwanted activities. Similarly, we may use personal data for risk assessment and security purposes, including the authentication of users and applications. For such purposes, we may have to stop certain Applications or put on hold Applications until we have finished our assessment.
- Improving our services: We also use personal data for analytical purposes. This is part of our drive to improve our services and enhance the user experience, but can also be used for testing purposes, troubleshooting and to improve the functionality and quality of our online services. The main goal here is to optimize and customize our online platform to your needs, making our site easier and more enjoyable to use. We strive to only use pseudonymized data for these analytical purposes.
- Student reviews and other related information: During and after your Educational Program you applied for through us, you may be invited to submit a review.
- By completing a review on Educational Program, you are agreeing that it can be displayed on, for example, the relevant University or School information page on our websites, on our social media accounts and social media apps, or on the online platform of the relevant University or School or business partner's website. This is to inform other Customers about the quality of the University or School you attended, or other experiences you choose to share.
- If you indicate whether a student review is helpful or not, we will aggregate this with feedback from other Students in order to sort and prioritize student reviews. We may use the information in your lists or in other related information you share with us in an anonymous form, unless you have included this information in your public profile. This is to help other Applicants like you find the right University or School and the best accommodation to suit them.
- Call monitoring: When you make calls to our customer service team, AcademConsult LTD uses an automated telephone number detection system to relate your telephone number to your existing Educational Program – this can help save time for both you and our customer support staff. Our customer service staff may still ask for authentication, which ensures that your application details are kept confidential.
- During calls with our customer service team, live listening may be done or calls may be recorded for quality control and training purposes which includes the usage of the recordings for the handling of claims and fraud detection purposes. Recordings are kept for a limited amount of time and automatically deleted, unless AcademConsult LTD has a legitimate interest to keep such recording for a longer period, including for fraud investigation and legal purposes.
- Legal purposes: Finally, in certain cases, we may need to use your information to handle and resolve legal disputes, for regulatory investigations and compliance, to enforce the terms of use of the AcademConsult LTD services or to comply with lawful requests from law enforcement.

To process your personal data as described above, we rely on the following legal bases:

- Performance of a contract: The use of your information may be necessary to perform the contract that you have with us. For example, if you use our services to apply to a University or School, we will use your information to carry out our obligation to complete and administer that application under the contract that we have with you.
- Legitimate interests: We may use your information for our legitimate interests, such as to provide you with the best suitable content of the website, emails and newsletters, to improve and promote our products and services and the content on our website, and for administrative, fraud detection and legal purposes.

How does AcademConsult LTD share your data with third parties?

In certain circumstances, we'll share your personal data with third parties.

- The University or School you applied to: This one's pretty crucial for what we do! In order to complete your Admission to a University or School, we transfer relevant details to the University or School you have applied to. Depending on the type of Application and University or School, this can include your name, contact details, payment details, name and any preferences or other information you specified when you filled in your Application. If you have a query about your

Educational Program, we may contact the University or School and ask them to handle your request. In cases of University or School Admission-related disputes, we may provide the University or School with your personal data as needed to handle the dispute. This may include a copy of your application as a proof that it was actually made.

- Third-party service providers: We use service providers to process your personal data on our behalf. This processing is for several purposes, including sending out marketing material or validating the correctness of the email address you provided during the application process. Third party service providers are bound by confidentiality clauses and are not allowed to use your personal data for other purposes than instructed by AcademConsult LTD.
- Payment providers and (other) financial institutions: When a chargeback is requested for your Educational Program by either you or by the holder of the credit card used to pay for the services provided by AcademConsult LTD, we need to share certain details with the payment service provider and the relevant financial institution to handle the chargeback. This may also include a copy of your Application or the IP address used to pay for the service provided by AcademConsult LTD. We may share information with relevant financial institutions, if we consider it strictly necessary for fraud detection and prevention purposes.
- Competent authorities: We disclose personal data to law enforcement insofar as it is required by law or is strictly necessary for the prevention, detection or prosecution of criminal acts and fraud or if we are otherwise legally obliged to do so. We may need to further disclose personal data to competent authorities to protect and defend our rights or properties, or the rights and properties of our business partners.
- Business partners: We work with many business partners around the world. These business partners distribute or advertise the AcademConsult LTD services, including the services and Educational Programs of Universities or Schools.

When you apply to a University or School on one of our business partners' websites or apps, certain personal data that you give them such as your name and email address, your address, payment details and other relevant information, will be forwarded to us to finalize and administer your Admission to a University or School. If customer service is provided by the business partner, AcademConsult LTD will share details relevant to your Application with the business partners (as and when needed) in order to provide you with appropriate and efficient support. When you fill in an Application through one of our business partners' websites, the business partners can receive certain parts of your personal data related to the specific Application such as your name and email address. This is for their own internal purposes (such as analytical purposes) and, if requested by you, for the administration of loyalty programs or marketing.

When you apply for an Educational Program on a business partners' website, please also take the time to read their privacy notice if you wish to understand how these business partners may process your personal data. For fraud detection and prevention purposes and as strictly necessary, we may also exchange information about our users with business partners.

- Advertising partners: We share personal data with advertising partners, including your email address, as part of marketing the AcademConsult LTD services via third parties (to ensure that relevant advertisements are shown to the right audience). We strive to only share email addresses in hashed form to enable the matching of your email address with an existing customer database so that your email address cannot be used for other purposes.

How does AcademConsult LTD process communications that you and University or School may send via AcademConsult LTD?

AcademConsult LTD can offer you and Universities or Schools various means to communicate about the Educational Programs, directing the communications via AcademConsult LTD. This allows you and Universities or Schools to contact AcademConsult LTD with questions about your Educational Program or about your accommodation partners via AcademConsult LTD web-site and via other channels that we make available.

AcademConsult LTD accesses communications and may use automated systems to review, scan, and analyze communications for security purposes; fraud prevention; compliance with legal and regulatory requirements; investigations of potential misconduct; product development and improvement; research; customer engagement, including to provide you with information and offers that we believe may be of

interest to you; and customer or technical support. We reserve the right to block the delivery of or review communications that we, in our sole discretion, believe may contain malicious content, spam, or may pose a risk to you, Universities or Schools, accommodation partners, AcademConsult LTD, or others. Note, all communications sent or received using AcademConsult LTD communication tools will be received and stored by AcademConsult LTD. Business partners through whose platform you made the reservation and Universities or Schools may choose to communicate with you directly via email or other channels that AcademConsult LTD does not control.

How does AcademConsult LTD make use of social media?

Here at AcademConsult LTD, we use social media in different ways. We use it partly to facilitate the use of our services, but also to promote University or School Educational Programs and to advertise, improve and facilitate our own services.

What security and retention procedures does AcademConsult LTD put in place to safeguard your personal data?

We observe reasonable procedures to prevent unauthorised access to, and the misuse of, personal data.

We use appropriate business systems and procedures to protect and safeguard the personal data you give us. We also use security procedures and technical and physical restrictions for accessing and using the personal data on our servers. Only authorized personnel are permitted to access personal data in the course of their work.

How does AcademConsult LTD treat personal data of children?

The services offered by AcademConsult LTD are not directed at children under 16 years old. For children younger than 16 years old, the use of any of our services is only allowed with the valid consent of a parent or a guardian. In limited cases as part of a School admission application, purchase of other related services, or in exceptional other circumstances (such as features addressed to families), AcademConsult LTD may collect and use information of children only as provided by the parent or guardian or with their consent. If we become aware that we process information of a child under 16 years old without the valid consent of a parent or guardian, we reserve the right to delete it.

How can you control the personal data you have given to AcademConsult LTD?

You always have the right to review the personal information we keep about you. You can request an overview of your personal data by emailing us to the email address stated below. Please write 'Request personal information' in the subject line of your email to speed things along a bit.

You can also contact us if you believe that the personal information we have for you is incorrect, if you believe that we are no longer entitled to use your personal data, or if you have any other questions about how your personal information is used or about this Privacy Statement. Please email or write to us using the contact details below. We will handle your request in accordance with the applicable Dutch data protection law.

How long Academconsult LTD retains personal data?

How long AcademConsult LTD should keep your personal data depends on the purpose for which it was obtained and its nature. If it continues to be necessary to hold the data for one of the reasons set out in Schedules 2 and 3 of the Data Protection Act (such as the performance of a public function or compliance with employment law), then you should retain it for as long as that reason applies. On the other hand, information with only a short-term value may have to be deleted within days. All personal data shall be deleted if you request so. To delete your personal data please write to us using the contact details below or email us to info@academconsult.ru Please write "Delete personal information" in the subject line of your email. We will handle your request in accordance with the applicable Dutch data protection law.

Who is responsible for the processing of personal data via AcademConsult LTD and how to contact us?

AcademConsult LTD controls the processing of as described in this Privacy Statement. AcademConsult LTD is a private limited liability company, incorporated under the laws of Russian Federation and has its office at office C405, 47-49 Ulitsa Marata, St. Petersburg Russia, 191002 .

Cookie statement

Whenever you use our online services, cookies and other tracking technologies can be used in various ways, such as making the AcademConsult LTD website work, to analyse traffic, or for advertisement purposes. These technologies are either used by us directly, or by our business partners, including third party service providers and advertisers we work with. If you want to learn more about what a cookie is, how they are used and what your choices are, please read more [here](#).

Liability

The liability for violation of the requirements of the laws of the Russian Federation and regulatory documents of AcademConsult LTD with regard to personal data processing and protection shall be determined in accordance with the Russian Federation laws.