

Consent to Personal Data Processing

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Language of the document.

This document is originally drafted in Russian. The English translation is provided for informational and convenience purposes only and does not constitute a legally binding version of the document. In the event of any discrepancies, inconsistencies, or conflicts between the Russian and English versions, the Russian version shall prevail.

In accordance with Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" (the "152-FZ"), including Articles 6, 9, 18.1, the User, by placing the corresponding mark at registration on the single sign-on `auth.chekak.store` of the online service "Chekak Store" and related online services (the "Platform"), freely, specifically, with informed knowledge and consciously gives consent to the processing of their personal data to the Operator:

Individual Entrepreneur Kosenkov Ivan Igorevich INN: 773717313581 OGRNIP: 326774600222374
Email: support@chekak.store Phone: +7 (968) 077-89-91 Registration in the Roskomnadzor register of personal data operators: will be indicated after entry in the Register

1. List of Processed Personal Data

Consent is given to the processing of the following categories of the User's personal data:

a) **Registration data:** email address; password hash (the password itself is not stored); unique Account identifier (UUID); the Account Callsign (login) automatically generated by the Platform;

a-bis) **Age confirmation 18+** — a boolean value set by the User by ticking the corresponding checkbox at registration (see Section 2.5 of the User Agreement). **The User's date of birth is not collected or stored on the Platform** — the Operator applies the principle of minimization (Article 5(5) of Federal Law 152-FZ);

a-ter) **Country of tax residency** — two-letter ISO 3166-1 alpha-2 code chosen by the User at registration. Used to determine available payment methods under applicable law, to comply with Federal Law 259-FZ (the prohibition on the use of digital currency as a means of payment by residents of the Russian Federation), to apply the corresponding tax/legal regime, and to log the User's declaration;

b) **Session identifiers:** authentication JWT token, HTTP-only Secure session cookie identifier, technical Android device identifiers (without Advertising ID);

c) **Technical data:** IP address of the User's device, browser type and version (User-Agent), time stamps of registration, sign-ins and consents — captured as evidence of consent and for security;

c-bis) **Technical device identifiers for the prevention of multiple and automated registrations** (Section 2.6 of the Privacy Policy): IP at registration/login, User-Agent, non-personally-identifying browser

fingerprint hash (SHA-256). Purpose — Platform information security and protection of the Operator's legitimate interests (fraud prevention and abuse of welcome bonuses; see Section 5.5 of the User Agreement). Retention — no more than 90 calendar days from the last registration/operation;

d) **Payment data:** order ID, amount, currency, status and time of payment; transaction history with the internal currency "chiki". Bank card details are **not stored** by the Operator — they are processed by JSC "TBank";

e) **Contact data for job marketplaces** (*voluntarily published by the User when creating a card on work.chekak.store or gigs.chekak.store*): phone, additional email, messenger identifiers (WhatsApp, Discord, etc.), geolocation (Yandex.Maps link or coordinates — work only);

f) **User-generated content** (*voluntarily placed by the User in the public part of the Platform under the Account*): prompts on prompt.chekak.store; example generation results (images, audio, video); skills, experience, rates on work/gigs; portfolio;

g) **Requests to functional addresses** (support@, legal@, partners@, ads@, money@chekak.store): letter content, attachments, sender email — handled by the Operator or a contractor-moderator (NDA, "moderator" role, logged). User-published content is moderated by the Operator/moderators;

h) **Third-party web analytics and advertising cookie identifiers** (*only with separate optional opt-in consent via the cookie banner; not connected as of the publication date — actual analytics is the Operator's own self-hosted Umami without cookies and without third-party transfer*): anonymous visitor identifiers, IP, User-Agent, on-site actions — when connected, transferred to **Russian** third-party analytics and ad operators (see Section 3);

i) **Files and media of processing services** (*voluntarily uploaded by the User*): contents of files on conversion services and audio/video on subs.chekak.store — may contain personal data of the User or **third parties** (for third-party data the User is an independent operator and IE Kosenkov is a processor on instruction; section 2.13 of the Policy); retained no more than 24 hours;

j) **Face image** (*live.chekak.store — AI photo "revival"; under development*): the uploaded face image is an image of a citizen under Article 152.1 of the Civil Code of the RF and is **not biometric personal data** (Article 11 of 152-FZ), as it is not used by the Operator to establish identity. Processed only with the User's separate explicit consent given by ticking a checkbox immediately before upload, with a limited retention period and automatic deletion; the User is responsible for third-party photos and deepfake misuse is prohibited. As of the publication date the service is a placeholder; no personal data is actually collected.

2. What Data Is NOT Processed

The Operator confirms that the following are **not processed**:

- Full name, passport details, SNILS, individual tax number of a natural person;

- **The User's date of birth** — only the User's self-set boolean flag confirming being 18+ is processed; the specific date of birth is not collected or stored, in accordance with the principle of personal-data minimization (Art. 5(5) of Federal Law 152-FZ);
- Address of actual residence, citizenship, gender;
- Special categories of personal data (race, ethnicity, political views, religious/philosophical beliefs, health, sex life — Article 10 of Federal Law 152-FZ);
- Biometric personal data, i.e. information used by the Operator to establish a subject's identity (fingerprints, iris scans, genetic data, etc. — Article 11 of Federal Law 152-FZ). The face image uploaded to `live.chekak.store` is processed **solely for animation** and is not used to establish identity, therefore it is not biometric data under Article 11 (it is processed as an image of a citizen under Article 152.1 of the Civil Code — see Section 1 "j");
- Full bank card data (PAN, CVV, expiry);
- Automatically read device geolocation (GPS, GLONASS);
- Device advertising identifiers (Google Advertising ID, Apple IDFA);
- Personal data of persons under 18 (the age limit for registration on the Platform is set under Article 21 of the Civil Code of the Russian Federation; confirmed by the User by ticking the checkbox at registration). Anonymous use of certain Platform utilities without registration is available to persons of any age — in that mode no processing of personal data of an identifiable subject is carried out.

3. List of Actions With Personal Data

Consent is given to the following actions in respect of the data in Section 1:

- collection; recording; systematization; accumulation; storage; clarification (updating, modification); extraction; use; anonymization; blocking; erasure; destruction.

Transfer of personal data to third parties is carried out only in cases expressly set out in the **Privacy Policy** (<https://chekak.store/legal/privacy-policy>):

- JSC "TBank" (T-Business package: internet acquiring + cloud online cash register) — for payments and fiscal receipts under Federal Law 54-FZ;
- the connected Fiscal Data Operator and the Federal Tax Service — through TBank's cloud cash register;
- **Russian** third-party web/through-analytics operators with opt-in consent — LLC "Yandex" (Yandex.Metrica), LLC "VKontakte" (VK Pixel), LLC "TMR Group" (Top.Mail.Ru), LLC "AdRiver" and other Russian systems. Servers only in the Russian Federation. Not connected as of the publication date; actual analytics is the Operator's own self-hosted Umami without third-party transfer;
- **Russian** advertising networks with opt-in consent — LLC "Yandex" (YAN), LLC "VKontakte" (VK Ads, myTarget), LLC "AdRiver", other Russian ad networks and ad-block partners. The Operator may place and sell advertising via the Platform storefront. Servers only in the Russian Federation. No advertising is placed as of the publication date;

- **advertisers — via the advertising portal `ads.chekak.store`**: anonymized web-analytics statistics (impressions, clicks, reach) collected by the Operator's own Umami system is provided to the advertiser — a third party — solely to place and assess the effectiveness of the advertising it purchased (legal basis: Art. 6(1)(5) of 152-FZ and consent via the "Advertising" cookie banner). The data is anonymized and does not identify a visitor; no cross-border transfer. Advertising may be placed on all of the Operator's sites and services, including `chekak.store` and `wb-helper.tech` with all subdomains. No advertising is placed as of the publication date — **launch is planned in the near future**;
- major **Russian** hosting providers (Timeweb Cloud, Yandex Cloud, VK Cloud, Selectel and others with data centers in the RF) — when hosting infrastructure/personal data in an RF cloud, under a contract with instruction terms;
- other Platform Users — in respect of public cards on `work.chekak.store/gigs.chekak.store`, published prompts on the prompt marketplace, and the publicly displayed Callsign (login), in the volume voluntarily placed by the author-User (Section 1, sub-paragraphs "a", "e" and "f");
- state authorities — in cases expressly provided by Russian Federation law.

Cross-border transfer of personal data is not carried out.

4. Methods of Processing

Processing is carried out with and without automation, in mixed form, with transmission over the Operator's internal network and the Internet. All databases containing the personal data of citizens of the Russian Federation are located on the territory of the Russian Federation under Article 18(5) of Federal Law 152-FZ (Federal Law 242-FZ).

Automated decision-making producing legal consequences for the User or otherwise affecting their rights and legitimate interests (Article 16 of Federal Law 152-FZ) is not carried out. In particular, when a suspicious combination of technical device identifiers potentially indicating multiple Accounts by one individual is detected (Section 2.6 of the Privacy Policy), the decision is taken by an authorized Operator employee after manual review; the User may challenge the decision under Section 10 of the Privacy Policy.

5. Processing Purposes

1. Registration and authentication of the User in the single Account via SSO `auth.chekak.store`.
2. Identification of the User in service delivery — access to the personal account, order/transaction history, chiki balance.
3. Conclusion and performance of the offer agreement for access to software products, digital content, and online services (including conversion services, AI services, work/gigs marketplaces, prompt store).
4. Settlements: payment acceptance through TBank acquiring, chiki balance management, refunds; determining available payment methods by country of tax residency.

5. Issuance of fiscal receipts under Federal Law 54-FZ.
6. Facilitating the connection between Users on work/gigs marketplaces — publishing voluntarily posted cards. The Operator acts as an information intermediary under Article 1253.1 of the Civil Code of the Russian Federation.
7. Communication with the User (system notifications, support responses, password recovery) via the registered email.
8. Ensuring Platform information security, including prevention of multiple and automated registrations (Section 2.6 of the Privacy Policy).
9. Fulfilling obligations imposed on the Operator under Russian Federation law (accounting, tax accounting, AML/CFT, the requirements of Federal Law 259-FZ).

6. Cookies and Opt-in Consents for Analytics and Advertising

(Same scheme as Section 9 of the Privacy Policy: technically necessary cookies under Art. 6(1)(5) of Federal Law 152-FZ without separate consent; the Operator's own self-hosted Umami analytics works without cookies and requires no consent; third-party **Russian** analytics and advertising only under separate opt-in via the banner and only with recipient servers in the RF — not connected as of the publication date; cross-subdomain synchronization through `chk_consent` cookie with `Domain=.chekak.store`; "continued use = acceptance" for technically necessary cookies; full acceptance of all categories upon Account registration. Form anti-bot protection is self-hosted Altcha; Google, Cloudflare and other foreign analytics/ad/protection services are not used.)

The User may at any time change or withdraw opt-in consents via the "Manage cookies" link in the footer of any Platform page.

7. What Is NOT Covered by This Consent

- **Marketing communications** (advertising emails, news, tariff updates) — governed by a separate consent under Article 18 of Federal Law 38-FZ on Advertising. The relevant checkbox at registration is optional; refusing it does not prevent registration. Marketing consent may be withdrawn at any time via profile settings or the "unsubscribe" link in each email.

8. Term of Consent

This consent is valid:

a) for the lifetime of the User's Account; b) additionally — for 3 (three) years after Account deletion, for potential recovery on failures, dispute resolution, and responses to state authority inquiries (within the general limitation period of Article 196 of the Civil Code of the Russian Federation; exception under Article 21(4) of Federal Law 152-FZ); c) to the extent required for accounting (Federal Law 402-FZ), tax accounting (Tax Code), and other mandatory rules — for the legally established periods (but no more than 5 years from the relevant operation); d) for the technical device identifiers processed for the prevention of

multiple/automated registrations (Section 2.6 of the Privacy Policy) — no more than 90 calendar days from the last registration/operation.

After these periods personal data is destroyed or anonymized.

9. Right to Withdraw Consent

Under Article 9(2) of Federal Law 152-FZ the User may **at any time** withdraw consent by:

a) deleting the Account independently through the personal account with two-step email confirmation (`AccountDeletionService`); b) sending a written request to `support@chekak.store` (from the registered email, or with attached identification).

The Operator undertakes to cease processing and destroy or anonymize the data within **10 (ten) business days** of receiving the withdrawal, except where processing is mandatory under Russian Federation law (accounting/tax; responses to state authorities).

10. User Rights as a Data Subject

Under Articles 14, 20, 21 of Federal Law 152-FZ the User has the right to:

- obtain information from the Operator about the processing of personal data;
- demand clarification, blocking, destruction of personal data if it is incomplete, outdated, inaccurate, unlawfully obtained or no longer necessary for stated purposes;
- obtain a copy of the processed personal data in machine-readable format (via the export service in the personal account or a written request);
- challenge a decision taken in respect of the Account based on correlation of technical device identifiers (Section 2.6 of the Privacy Policy);
- appeal the Operator's actions (inaction) to the Federal Service for Supervision of Communications, Information Technology, and Mass Media (Roskomnadzor) at `https://eais.rkn.gov.ru/feedback/` or in court.

11. Confirmation

The User, by placing the mark "I consent to the processing of personal data under Federal Law 152-FZ" at registration on `auth.chekak.store`, confirms:

a) that they have read this Consent and understand its content; b) that consent is given freely, of their own will, in their own interests; c) that they have reached 18 years of age (the minimum registration age set by the User Agreement) and that the age-18+ mark they placed is accurate; d) that the declared country of tax residency is accurate and that they understand the effect of this choice on available payment methods; e) that the Operator has informed them of the purposes, methods, periods, and other processing conditions, including the processing of technical device identifiers for the prevention of multiple Accounts (Section

2.6 of the Privacy Policy); f) that giving this consent does not deprive the User of the right to withdraw it under Section 9.

The fact of consent is logged by the Operator with date, time, IP address, and User-Agent of the User's browser as evidence of informed consent (Article 9(4) of Federal Law 152-FZ).