

## **PRIVACY POLICY**

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The owners and Joint Data controllers of this web page is IT company ZUMO Studios (Spasst GmbH, based in Chur, Switzerland, Ringstrasse 14, represented by director Dmitrij Tonet, contact [dimitrij@zumostudios.ch](mailto:dimitrij@zumostudios.ch) and "DC Ventures" O.O.O. Moscow, Russian Federation, Petra Romanova Street 7/1, represented by director Dmitrij Tonet, contact: [dimitrij@dcventures.ru](mailto:dimitrij@dcventures.ru). ZUMO Studios, we respect your concerns about privacy and value the relationship that we have with you. We are committed to protecting it through our compliance with this Privacy Policy Statement. Our Privacy Policy explains our principles when it comes to the collection, processing, and storage of your information.

### **ACCEPTING THE PRIVACY POLICY**

Please take a few minutes to read this Privacy Policy, so that you understand what information we collect, what we do with it and why, how we protect it and what are your rights in relation to this information. It's important that you understand that by visiting our website, you allow us to collect, use, disclose, and retain your personal information and other information described below. You can be sure that we will only use your information as described in this Policy. Please be aware that the privacy laws and standards in certain countries, including the rights of authorities to access your personal information, may differ from those that apply in the country in which you reside.

### **LEGAL BASIS**

Under the General Data Protection Regulation (GDPR(Regulation (EU) 2016/679)), ePrivacy Directive (Privacy and Electronic Communications Directive 2002/58/EC), Switzerland and Russian Personal Data protection Law, our legal basis for processing your personal data are:

- Users verified consent for one or more specific purposes;
- The processing is necessary for the legitimate interests of the data controller or third party, except where overridden by the interests, rights and freedoms of the user, in particular where the user is a child.

### **DATA WE COLLECT**

We gather your personal information from your CVs sent [hello@zumostudios.ch](mailto:hello@zumostudios.ch), for potential recruitment opportunities within the Spasst GmbH (Switzerland).

We gather your documents sent on [hello@zumostudios.ch](mailto:hello@zumostudios.ch) for possible collaboration.

### **HOW WE USE COLLECTED DATA**

We use your personal information only for the purpose of potential recruitment opportunities or for possible collaboration. We will not transfer your Personal Information to any other third parties except in circumstances where you consent to such transfer. We share your information with selected recipients who have a legal basis and valid jurisdiction to request such data (for example: government, public, regulatory, judicial and law enforcement bodies or authorities, where we are required to comply with applicable laws or regulation, a court order, subpoena or other legal process).

## **DATA RETENTION AND SECURITY OF YOUR INFORMATION**

We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and after it is received, such as variety of security technologies and procedures for the purpose of preventing loss, misuse, unauthorized access, or disclosure of Information server. We store and process your personal information on the computers who are password protected and platforms (Slack, Jira, Confluence, BambooHR, Google Drive) with restricted access and only our employees with the special permission can access and process them. Your CVs along with your personal information are deleted from our computers after 3 years, but they stay for indefinite period of time in platform that we use. For the more information regarding the Privacy policy of Slack, Jira, Confluence, BambooHR, Google Drive, please check out their web site: <https://slack.com/intl/en-rs/privacy-policy>  
<https://www.atlassian.com/legal/privacy-policy> <https://www.bamboohr.com/privacy-policy/>  
<https://support.google.com/drive/answer/2450387?hl=en>

## **WHO HAS ACCESS TO YOUR INFORMATION?**

Only the “ZUMO Studios” or “DC Ventures 000” employees with special permissions have access to your data.

## **TRANSFER OF THE INFORMATION**

We store and process your personal information on our computers in Switzerland and the Russian Federation.

## **YOUR RIGHTS**

### **The right to access and correction**

You have the right to access your personal data and information about how your personal data is being processed by us. Upon your request through e-mail [hello@zumostudios.ch](mailto:hello@zumostudios.ch), we will provide with information about whether we hold any of your personal information. You also have the right to access personal information we hold about you, how we use it, and who we share it with. You also have the right to correct that information.

### **The right to erasure**

You may request that we erase the Personal Information we hold about you. To do so please contact us on: [hello@zumostudios.ch](mailto:hello@zumostudios.ch). Please note, however, that we may retain the Personal Information if there are valid grounds under law for us to do so (e.g., for the defense of legal claims, freedom of expression or some other legal obligation) but we will let you know if that is the case.

### **The right to restriction of data processing**

You have a right to require us to stop processing the Personal Information we hold about you other than for storage purposes in certain circumstances on [hello@zumostudios.ch](mailto:hello@zumostudios.ch). Please note, however, that if we stop processing the Personal Information, we may use it again if there are valid grounds under data protection law for us to do so (e.g. for the defense of legal claims or for another’s protection). Where we agree to stop processing the Personal Information, we will try to tell any third party to whom we have disclosed the relevant Personal Information so that they can stop processing it too.

### **The right to data portability**

You have the right to receive a copy of certain Personal Information we collect from you. This comprises any personal information we process on the basis of your consent. You have the right to receive this information in a structured, commonly used and machine-readable format.

You also have the right to request that we transfer that personal information to another party. If you wish for us to transfer the Personal Information to a third party, please ensure you detail that party. Note that we can only do so where it is technically feasible. We are not responsible for the security of the Personal Information or its processing once received by the third party. We also may not provide you with certain Personal Information if providing it would interfere with another's rights (e.g. where providing the Personal Information we hold about you would reveal information about another person or our trade secrets or intellectual property).

## **COOKIE POLICY**

### **WHAT ARE COOKIES?**

Cookies are small text files that can be used by websites to make a user's experience more efficient.

### **WHY DO WE USE COOKIES?**

At ZUMO Studios we use cookies to analyze our website traffic, to personalize content and ads, and to link you to recent marketing campaigns.

### **TYPES OF COOKIES**

**Statistic cookies** - help us to understand how visitors interact with Website by collecting and reporting information anonymously (GoogleTag).

**Marketing cookies** - used to track visitors across Websites. The intention is to display ads that are relevant for the individual user and thereby more valuable. (FacebookTag and LinkedInTag)

We may change this Policy at any time: please take a look at the "LAST UPDATED" date at the top of this Policy to see when it was last revised. For any further queries, privacy related questions, or any other requests please contact us at the following address:  
hello@zumostudios.ch