

PENTESTIT LLC
PRIVACY POLICY

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1. GENERAL PROVISION

This privacy policy sets out how Pentestit LLC uses and protects any information that it can obtain about the user during the use of the site pentestit.ru, nemesida-security.com, defcon.ru, nemesida-waf.com and their subdomains (further — Sites). Pentestit LLC is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified when using this website, then you can be assured that it will only be used in accordance with this Privacy policy.

2. DEFINITIONS

Personal data — means any information relating to an identified or identifiable natural person («data subject»); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Processing — means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Restriction of processing — means the marking of stored personal data with the aim of limiting their processing in the future.

Pseudonymisation — means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

Filing system — means any structured set of personal data which are accessible according to specific criteria, whether centralised, decentralised or dispersed on a functional or geographical basis.

Controller — means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law. In respect of our website is Pentestit, a limited liability company registered in The Russian Federation, Orlovskaya oblast (individual registration number 7710958665), the registered office of which is 2110, building 54, Gaidara street, Orel.

Processor — means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

Recipient — means a natural or legal person, public authority, agency or another body, to which the personal data are disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients; the processing of those.

3. PERSONAL INFORMATION OF USERS WHICH COLLECTS AND PROCESSES THE WEBSITE

3.1. As part of this Policy, the Sites automatically collect data:

- cookie;
- IP-address;
- e-mail, nickname, achievements etc. (for registered users).

Pentestit LLC collects information on our users by their voluntary submissions and through cookie technology. When you use our services or view content provided by us, we automatically collect and store certain information in server logs. We refer to this automatically-collected information as «Device Information».

We also use Internet services to collect and process data about visitors.

3.2. We use traffic log cookies to identify which pages are being used. This helps us analyse data about webpage traffic and improve our website in order to tailor it to customer needs.

3.2.1. «Cookies» are small data files sent by a website's server to a web browser, processor memory or hard drive and stored there. They can be used for a range of different purposes, such as customising a website for a particular user, helping a user navigate a website, improving that user's website experience, and storing that user's preferences and login information.

3.2.2. Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us.

3.3. «Log files» track actions occurring on the Sites, and collect data including your IP address, browser type, Internet service provider, referring/exit pages, and date/time stamps.

3.4. «Web beacons», «tags» and «pixels» are electronic files used to record information about how you browse the Sites. If you are a user of our Service or otherwise visit our Sites, we collect the following type of information through your use of the Sites: Email, Nickname and Achievements Information. We process Personal Information that you provide through creation and management of your account, such as your nickname, e-mail address and achievements information.

We use the Device Information that we collect to help us screen for potential risk and fraud and more generally to improve and optimize our Sites (for example, by generating analytics about how our customers browse and interact with the Sites). We are committed to ensuring that your information is secure.

3.5. By continuing to use the Sites, the user agrees to the use of these technologies for the Sites. Pentestit LLC uses information, collected by means of these technologies for the purposes specified in policy confidentiality.

3.6. Personal data stored all the time you use the service and will be deleted after your first request.

4. RIGHTS OF THE DATA SUBJECT

4.1. Right to be informed. The right to be provided with clear, transparent and easily understandable information about how we use personal data.

4.2. Right of access. This enables the data subjects to receive a copy of the personal data we process about them and to check that we are lawfully processing it.

4.3. Right to rectification. Request correction of the personal data that we process about the data subjects.

4.4. Right to erasure (the right to be forgotten). This enables the data subject to ask us to delete or remove personal data where there is no good reason for us continuing to process it.

4.5. Right to restriction of processing. This enables the data subjects to ask us to suspend the processing of personal data about them, for example if they wish us to establish its accuracy or the reason for processing it.

4.6. Right to data portability. Request the transfer of personal data. We will provide to data subjects, or a third party Processor has chosen, their personal data in a structured, commonly used, machine-readable format.

4.7. Right to object. The data subject may object at any time to our processing of his personal data when such processing is based on our legitimate interests.

4.8. Right to withdraw data protection consent. If the data subject withdraws his consent, we may not be able to provide the data subject with access to the certain specific functionalities of our Sites.

4.9. Right to complain. The data subject has the right to contact the data protection authority of his country in order to lodge a complaint against our data protection and privacy practices.

4.10. Right to deactivate cookies. If the data subject wants to restrict or block all the cookies which are set by our websites, he should use the tool available on the particular website (if applicable), or refer to the Help function within his browser to learn how to manage the settings within the browser.

5. PRINCIPLES RELATING TO PROCESSING OF PERSONAL DATA

5.1. The processing of personal data is based on the following principles:

- principles of legality, equity and transparency;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89 (1) (GDPR), not be considered to be incompatible with the initial purposes («purpose limitation»);
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- the data is processed in such a way as to ensure adequate security, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

5.2. Provision of personal data to a certain circle of persons. The Operator has the right to provide the User's personal data to a certain circle of persons who help the Operator to carry out its activities solely in the interests of the User. The provision of personal data may be terminated at any time at the request of the User.

6. METHODS AND TERMS OF PERSONAL DATA PROCESSING, SUBSEQUENT STORAGE

The operator can perform the following actions with personal data: collection, recording, systematization, accumulation, storage, clarification, extraction, transfer (involves provision), depersonalization, blocking, deletion, destruction.

The period of processing of personal data is determined by the period of achievement of the goals of working with personal data. Subsequent storage of personal data is carried out using the principle of minimal identification.

7. CONDITIONS APPLICABLE TO CHILD'S CONSENT IN RELATION TO INFORMATION SOCIETY SERVICES

The processing of the personal data of a child shall be lawful where the child is at least 16 years old. Where the child is below the age of 16 years, such processing shall be lawful only if and to the extent that consent is given or authorised by the holder of parental responsibility over the child.

The controller shall make reasonable efforts to verify in such cases that consent is given or authorised by the holder of parental responsibility over the child, taking into consideration available technology.

8. PROCEDURE AND CONDITIONS FOR OF THE PERSONAL DATA DESTRUCTION

The destruction or depersonalization of personal data is carried out upon the achievement of the purposes of their processing or in case of loss of the need to achieve these goals, as well as in the case of the User's request with the corresponding requirement.

9. SECURITY OF PROCESSING

9.1. Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- the pseudonymisation and encryption of personal data;
- the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;

- a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

9.2. In assessing the appropriate level of security account shall be taken in particular of the risks that are presented by processing, in particular from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.

Pentestit LLC is committed to maintaining the services in a manner that protects information from accidental or malicious destruction.

10. UPDATES TO THIS POLICY

This Policy may be subject to amendments. Pentestit LLC shall be entitled to make such amendments at its own discretion, including, without limitation, to reflect changes in applicable legislation or amendments to the Site.

11. CONTACTS

For more information about our privacy practices, if you have questions, or if you would like to make a complaint, please contact us by e-mail info@pentestit.ru.