

## Privacy Policy

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## **Privacy Policy**

Thank you for visiting website top-cat.org. We are doing our best to protect any personal information you give us. This document, which we update from time to time, describes what we do with your personal information. There is also contact information of our data protection officer in case you have any questions about our Privacy policy.

### **About us**

#### ***What is top-cat.org? Who is collecting your personal data?***

Top-cat.org is a website which is designed for the following purposes:

- to give to the cat owners an access to the international cat's ranking system called Top Cat;
- to give to the feline clubs a software for conducting a cat show and making necessary documents for it;
- to provide to the cat owners an easy and simple way to place an application for participation in the cat show;
- to give to internet users an access to the list of cat shows, list of catteries, list of feline judges, list of feline clubs and other information placed on this website;
- to create a network of professional feline society within which feline professionals may promote themselves and their cats, catteries and clubs;
- to maintain an archive of purebred cats and their achieved titles.
- We work with distributors (as discussed below) who manage the hosting, purchase and payment for our products and services and so on. If you provide information directly to our affiliates, distributors or suppliers, the terms of their respective privacy policies, and not this Privacy Policy, will apply to such disclosures.

Top Cat and Top Cat rating are the trading names of Animal Service LLC, a legal entity incorporate in accordance with laws of Russian Federation in Penza, Russia. Full address of organization is 440000, Russian Federation, Penza, Moskovskaya street, 13a. Our TIN is 5836646808.

## Privacy

### *What kind of personal information does top-cat.org use?*

When you create a profile at top-cat.org, place some information about yourself to your profile or use our website (for example place an application for the show) you give us the information we need to give you the requested service and to achieve the above mentioned purposes. This may

include:

- your name, patronymic and surname;
- your e-mail;
- your cell-phone number;
- your age and gender;
- your login;
- your picture;
- your website address or links to your social media accounts;
- the city and country you live in;
- who you are in the feline society (show organizer, the owner of the cat, the breeder, the photographer or other professional in the feline sphere, the cattery owner, the feline judge and so on);
- the name of your cat, its id in top cat system and other information related to your cat;
- information you gave us in the feedbacks and comments on the website;
- any other information you disclose to us or which became known to us as a result of your interaction with website;
- payment information.

This information is used for providing you the services at our website and for achieving the above mentioned purposes. Though not all of the information you give to us is personal data we do our best to protect all the information you share with us.

Any user is free to share some of the information from our website via social media services using the «share to social media account» button. You will have to pass the social media authorization for that.

We do not process personal data of minors under the age of 16.

***Does <https://top-cat.org> use cookies or is technical information collected?***

When you visit our website, we may collect certain information even if you have not registered on our website or have not been authorized. The server's logs record information that does not personally identify the visitor, such as the time and date of the visit, the browser and the operating system used, the IP address and address of the website from which the visitor visited our website. Such data may also include settings of the selected language and the pages viewed by the visitor. None of this information tells us who you are, but nevertheless, such information can be regarded as personal.

Cookies are small text files that are placed on your computer by the websites you visit. They are widely used to make websites work or work more efficiently, as well as to provide information to website owners.

**Cookies Required.**

The required cookies include basic features such as security and accessibility. You can disable them by changing your browser settings, but this may affect the website operation.

We use the following required (technical) cookies:

**cookies\_usage\_confirmation, is\_additional\_cookies\_accepted** - such cookies contain information about the user's choice regarding his/her use of cookies or the user's will not to make any choice.

**topcat** - such cookies contain information required for authentication in the service.

**Analytical cookies**

We and our partners use analytic cookies to help us improve our Website by collecting and reporting information about how you use it. Cookies collect information in such a way that we cannot identify you. This information is

processed only if you have given your consent. The information obtained using such cookies is available to third parties, in particular, to Google, Yandex.

We use the following analytical cookies:

**IDE** - this cookie contains information about how the end user uses the website and any advertisements that the end user may have seen prior to visiting such website.

**\_ga** - this cookie is connected with Google Universal Analytics. This cookie is used to identify unique users by assigning a randomly generated number as a customer ID. It is included in each page request on the website and is used to calculate visitor, session, and campaign data for website analytics reports.

**\_gat** - this cookie is connected with Google Universal Analytics; it is used to throttle the speed of requests - limit data collection on high traffic websites.

**\_gid** - this cookie is connected with Google Universal Analytics and stores and updates a unique value for each page visited.

**\_ym\_d** - this cookie is connected with Yandex Metrica and contains the date when the user first visited the website.

**\_ym\_isad** - this cookie is connected with Yandex Metrica and determines whether the user has an ad blocker enabled or not.

**\_ym\_uid** - this cookie is connected with Yandex Metrica. This cookie is used to identify unique users by assigning a randomly generated number as a customer ID.

**\_ym\_visorc\_XXXXXXXXXX** - this cookie is connected with Yandex Metrica, contains a WebVisor's identifier and allows the session to work correctly.

**i; yandexuid** - this cookie is connected with Yandex Metrica. This cookie allows to distinguish visitors.

**yabs-sid** - this cookie is connected with Yandex Metrica. This cookie is used as a visit ID.

**yp** - this cookie is connected with Yandex Metrica; this cookie is used as

a persistent container for storing portal data.

**ys** - this cookie is connected with Yandex Metrica. This cookie is used as a session container for storing portal data.

**mda** - this cookie is connected with Yandex Metrica. This cookie is used for multi-domain authorization.

**ymex** - this cookie is connected with Yandex Metrica. This cookie is used for advertising, helps to distinguish users, is used to analyze platforms and websites, to measure and analyze web traffic.

**yuidss** - this cookie is connected with Yandex Metrica. This cookie collects information about the user's behavior on multiple websites. This information is used on the website to optimize relevance of the advertisements.

**GDPR cookie** - this cookie is used only for Yandex. How it works: when a visitor residing in a region where the GDPR rules apply starts to use a Yandex service, he/she sees a notification about the use of cookies by Yandex services. The GDPR cookie is a session cookie.

### **Managing the parameters of analytical cookie files.**

To manage the parameters of cookies, you need to follow the link: <https://en.top-cat.org/articles/cookie-policy> and select the needed option that determines collection and processing of cookies.

At any time you may change the cookie settings chosen by you following the link: <https://en.top-cat.org/articles/cookie-policy>.

### **Disabling cookies.**

Most web browsers allow you to refuse to accept cookies. You may also delete cookies stored on your computer.

Various browsers may use different methods to manage cookies.

If you refuse to use cookies, this may lead unavailability of some Website functions to you, which will affect your ability to use the Website.

### ***Does top-cat.org receive information about me from other sources?***

We may periodically obtain both personal and non-personal information about you from affiliated entities, business partners and other independent third-party sources and add it to other information about you. For example, if you visit top-cat.org by "clicking through" from a site operated by one of our business partners, and you have registered with that partner, then information about you that you have provided to that partner may be shared with us, such as contact information and demographic information. That helps us update, expand, and analyze our records and identify new customers, and provide products and services that may be of interest to you.

### ***Why does top-cat.org collect, use and share your personal information?***

- *Placing an application for participation in a show:* We use your personal and non-personal information to complete your application, and to forward the necessary details to the club which organizes the show.

- *Participating in the Top Cat rating:* We use your personal and non-personal information to ensure that you participate in the Top Cat rating and to provide you our service.

- *Participating in other cat ratings:* If you choose to participate in other cat ratings of our partners and click on their websites a button "log in with Top Cat account" after you enter authorization information we will share some of your personal and non-personal information with the cat rating you have chosen to participate in.

- *Software for conducting a cat show:* We use your personal and non-personal data for granting you the access to the Top Cat software for organizing a cat show.

- *Catalogues on the website:* We use your personal and non-personal information to include it to the feline network catalogues, such as list of cat shows, list of catteries, list of feline judges, list of feline clubs and other information placed on this website.

- *Network of professional feline society:* We use your personal and non-personal information to create and to maintain a network of professional feline society and to give you an opportunity to promote yourself as a feline professional breeder, cattery, club or other feline professional among other feline professionals.
- *Archive of purebred cats and their titles:* We use your personal and non-personal information to maintain an archive of purebred cats and their titles.
- *Customer service:* We provide customer service. This insures that we can handle any problem you might meet with during your experience with our website and respond to your queries.
- *User reviews:* We may use your contact information to send you a proposition to leave a feedback regarding the use of our website or our software. This helps us understand and improve our service and the service our partners provide.
- *Marketing activities:* We also use your personal information for marketing activities, as permitted by law. We may use it to contact you by telephone, email, message to chat or SMS with information on our latest news, offers and updates, including details of our (or our affiliated partners’) services, special offers, discounts or promotions, new services, and forthcoming events. You may opt out of receiving the said communication by ticking the relevant box when you accept the relevant type of communication or you can also opt out at any time by clicking “unsubscribe” in the email or send us a short message to our e-mail [dpo@top-cat.org](mailto:dpo@top-cat.org).
- *Other communications:* There may be other times when we contact you by email, phone, message to chat or SMS, depending on the contact information you share with us. This could be in case if we need to respond to your request, or when we need to send you technical information (like how to retrieve your password in case you have forgotten it, etc.).



***What are the legal basis under which the top-cat.org processes your information?***

For each process of procession of personal information by top-cat.org there is a separate legal basis.

In the meaning of EU General data protection regulation - for participating in the show and Top Cat rating, participating in the professional feline network (your profiles) and using a Top cat software

- it is a contract stipulated between you and top-cat.org or you and top-cat.org and the club. For customer service, user reviews, marketing activities and other communications - it is a legitimate interest. You will be informed about the process of procession of your personal data and the bases lying under it once you enter in it.

As we are a Russian entity incorporated under Russian laws we need to comply with Russian Federation data protection laws as well. Please beware that the basis of procession of personal information in the meaning of Russian Federation data protection legislation may be different and it is indicated in the section procession of personal information of this Privacy policy.

***How long does the top-cat.org keeps your information?***

For each process of procession of personal information by top-cat.org there is a different term of keeping your personal information.

In the meaning of EU General data protection regulation - the information which is used for participating in the show and Top Cat rating, participating in the professional feline network (your profiles) and using a Top cat software - the term of keeping your data is the length of the contract plus three years and one day after it is terminated under any reason.

For information which we might get from performing customer service, from user reviews, and which we use for marketing activities and other communications - the term of keeping it is four years. It doesn't mean that you can't stop receiving the communications from us until then or execute your other

rights under GDPR. For example you can unsubscribe from our e-mails at any time by clicking unsubscribe button in any of the letters or you can write us an e-mail to [dpo@top-cat.org](mailto:dpo@top-cat.org).

***How does top-cat.org share your information with third parties?***

In most of the situations we don't share your personal information with third parties. Like we don't sell you personal information to marketing companies and don't give your personal information to third parties without solid and lawful basis under it or without your request to do so (to share your personal information with a third party).

Still in certain situations, we may share your personal information with third parties. For example if you place an application for participating in the show using our software we share it with the club which organizes the show, if you choose to log in at a different website with top-cat.org account and to participate in a different cat rating - we will share with some of your personal and non-personal information with organizer of this cat rating after you authorize with your top-cat.org account.

We may share your personal information with payment service provider as well.

We may use third-party service suppliers to process your personal information on our behalf for the purposes described above (for example we use hosting provider Komtet LLC for hosting our web-site and we use authorization services of Motmom LLC).

Also please beware that our affiliates, distributors and suppliers may have privacy policies that differ from top-cat.org's Privacy Policy. If you share your information with them directly you should read and rely upon the relevant supplier, affiliate or distributor Privacy Policy only (and not top-cat.org's Privacy Policy).

We may share your personal information with government or investigative authorities if required by law or court order.

***Is the information I share with top-cat.org visible to all of the users in Internet?***

Two of the main functions of the top-cat.org website are to create a network of feline professionals and to maintain cat rating, both of which are highly alike the social media resources. So some of the information you share with us is visible for all of the users in Internet. **Please beware that when you create your profile at top-cat.org you include some of your personal information to the publicly available source of information.**

You may change your settings and make some of the information unavailable to guests of the website.

Unregistered users (guests of the website) can see for example the following data on our website:

- [current status of the Rating](#) (names of the leading cats, their breeder's and owner's names and their profiles, number of points in the Ratings, shows in which the cat has participated and the titles it has achieved there and so on);
- [information on shows](#), which are planned to be or have already been held within the Rating (their participants, judges, winners, information from organizer of the show and show photos);
- total number of points and the number of points awarded to each of the winners
- websites of [pets](#), [users](#), [catteries](#) and [clubs](#), their photos and links to their social media accounts with detailed information about them.

***Can the information I shared with top-cat.org be corrected/deleted?***

You can change your personal information you have shared with us at your personal account at any time. Just hit the "edit" button when you are logged in under your profile. You can delete the personal information you have provided us using the same way. Also you may execute your rights for amending and deleting your personal information including the right to be

forgotten via sending us an e-mail to [dpo@top-cat.org](mailto:dpo@top-cat.org).

Please beware that we might ask you for some identification information to make sure that it is you who sending us a request and that your information is accurate. We may block/delete some or all of your information if you don't provide confirmation upon request and we have information that you gave us unreliable information (for example if you have registered as if you would have been a different person and this person sends us a claim about it).

## **Security**

### ***What security procedures does top-cat.org put in place to safeguard your personal information?***

In accordance with EU General data protection regulation and Russian Federation data protection laws, we observe reasonable procedures to prevent unauthorised access to and misuse of personal information. We use appropriate business systems and security procedures to protect your personal information. We take necessary and sufficient organizational and technical measures to protect the your personal information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, or other unlawful actions of third parties. Only authorised personnel are permitted to access personal information in the course of their work. We have data protection officer appointed who will be in charge of performing an audit of security measures which were installed in our organization.

Though we do our best to keep all of your information safe we still ask you no to transfer your login and password to third parties. Please take reasonable measures to keep your confidentiality at a high level as well.

## **Marketing Emails**

### ***How can you opt out from marketing emails?***

You can opt out at any time by clicking “unsubscribe” in any of these emails or write a short notice to our e-mail [dpo@top-cat.org](mailto:dpo@top-cat.org).

## **Procession of personal information**

### ***How does top-cat.org process your personal information?***

As we need to comply both with EU General Data protection regulation and Russian Federation legislation in order this Privacy policy would be found clear and binding by the Russian data protection authorities we need to separately indicate that we process users personal information for the purpose of provision by us, the ANIMAL SERVICE, of the services connected with the use of the Website by the Users. Under Article 6 of Federal Law on Personal Data No. 152-FZ dated July 27, 2006, the User's individual consent to processing of his/her personal information is not required. Under s.p. 2, p. 2 of Article 22 of the above law, ANIMAL SERVICE has the right to process personal information without notifying the authorized body for protection of the rights of personal information holders. ANIMAL SERVICE has the right to perform any action (operation) or set of actions (operations) with the User's personal information, with or without automation means, including collection, recording, systematization, accumulation, storage, change (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data.

### ***What rights do you have regarding your personal information processed by top-cat.org?***

You have the following rights:

- A rights for transparent information, communication and modalities for the exercise of your rights of data subject;
- A right for information to be provided where your personal data have not been obtained from you;
- A right of access to your information;
- A right to rectification;
- A right to erasure;

- A right to restriction of processing;
- A right of notification obligation regarding rectification or erasure of personal data or restriction of processing;
- A right to object;
- A right to object automated individual decision-making;
- A right to exercise other rights provided by this Policy or current legislation of Russian Federation.

You may apply to us for the purpose of clarifying your personal information, or for the purpose of blocking or destroying it in case such information is incomplete, outdated, or unreliable. At a request, you may receive information concerning the processing of personal information from us. Also you may apply to us with a request to delete the account on the Website. On the basis on such a request, we will delete all the personal information specified in the your account. However, some information about your animals will not be deleted due to the fact that it is of significant importance to other users of the website and to the separate basis for keeping it (legitimate interest).

### **Contact & complaints**

#### ***How can you control the personal information you have given to top-cat.org?***

You can request a copy of the information we have about you by email. To keep your information safe, we may ask for further information to confirm your identity. If you would like to correct the information you gave to us - please write us an e-mail so we can correct it. Should you have any questions, concerns or comments about our practices or this Privacy Policy, please write us an e-mail to [dpo@top-cat.org](mailto:dpo@top-cat.org). Also our DPO can be reached by phone +7(8412)20-36-59 or by post mail to 440000, Russian Federation, Penza, Suvorova street, 92, Animal Service LLC.

***How can you raise a complaint regarding top-cat.org processing your personal information?***

You can write a complaint directly to us at e-mail [dpo@top-cat.org](mailto:dpo@top-cat.org) or you can use other opportunities to place a complaint.

You have a right to contact the data protection authority in your country in order to appeal against the Administration's methods for data protection and privacy.

***In which country will my personal data be processed?***

Top Cat is located in the Russian Federation, and all the user data processed by Top Cat is also located in the Russian Federation.

IF YOU ARE A RESIDENT OF AN EU MEMBER COUNTRY, YOU SHALL REMEMBER THAT RUSSIA IS NOT INCLUDED IN THE LIST OF COUNTRIES THAT PROVIDE AN ADEQUATE LEVEL OF PERSONAL DATA PROTECTION. THE DETAILED LIST OF SUCH COUNTRIES MAY BE FOUND AT: [https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions\\_en](https://ec.europa.eu/info/law/law-topic/data-protection/international-dimension-data-protection/adequacy-decisions_en).

THIS DOES NOT MEAN THAT TOP CAT DOES NOT PROVIDE AN ADEQUATE LEVEL OF PROTECTION OF YOUR PERSONAL DATA. TOP CAT TAKES ALL THE REQUIRED AND SUFFICIENT ORGANIZATIONAL AND TECHNICAL MEASURES TO PROTECT YOUR PERSONAL DATA FROM UNAUTHORIZED OR ACCIDENTAL ACCESS, DELETION, ALTERATION, BLOCKING, COPYING, DISTRIBUTION OR OTHER ILLEGAL ACTIONS OF THIRD PARTIES, AS WELL AS TO COMPLY WITH THE REQUIREMENTS OF THE GENERAL DATA PROTECTION REGULATION OF THE EUROPEAN UNION.

**Other provisions**

This Policy has been developed and is applied in accordance with the User Agreement posted on the Website at: <http://ru.top-cat.org/legal->

documents/privacy-policy.

Your personal information is processed in accordance with the current legislation of the Russian Federation and applicable EU General data protection regulation. By registering on the Website, you expressly consent that any disputes arising out of the use of the website will be resolved on the basis of and in accordance with the laws of the Russian Federation by a court of the Russian Federation at the location of ANIMAL SERVICE LLC.