

Privacy Notice

Version of 24 September 2026.

Prepared with regard to Regulation (EU) 2016/679 (General Data Protection Regulation, "GDPR") as published in OJ L 119, 4.5.2016, with corrigendum OJ L 127, 23.5.2018 (text as reproduced on gdpr-info.eu), EDPB Guidelines 3/2018 on the territorial scope of the GDPR (version 2.1, 7 January 2020), Directive 2002/58/EC (ePrivacy) Article 5(3) [confirm consolidated version date on EUR-Lex], and Russian Federal Law No. 152-FZ of 27 July 2006 on personal data as amended up to and including 26 July 2026 (per base.garant.ru as of 24 September 2026).

1. Controller

1.1. The controller of your personal data is [Full name], an individual resident in the Russian Federation, Taxpayer ID (INN) [INN], applying the professional income tax regime (the "Controller").

1.2. Contact details: email [email]; Telegram [Telegram]; postal address [postal address].

1.3. "Ashehai" is the trade name of the website [website address].

It is not a legal entity and not a controller.

The controller is the person named in Clause 1.1.

1.4. Representative in the European Union (Article 27 GDPR): [name and contact details of the EU representative, if designated / "not designated" – see README, lawyer to decide].

1.5. The Controller has not appointed a data protection officer.

2. Personal Data We Collect

2.1. Through the contact form and in correspondence: your name or nickname; your email address and/or Telegram username; the text of your message and any information you choose to include in it.

2.2. If you order services: your name and contact details, the correspondence about the order, and payment information (amount, date, method).

If you act for a company: your name, role and business contact details.

2.3. We do not request special categories of personal data (Article 9 GDPR).

Please do not send them.

3. Purposes and Legal Bases

3.1. Replying to your inquiry and discussing a possible order – Article 6(1)(b) GDPR (steps taken at your request prior to entering into a contract).

3.2. Concluding and performing the contract with you – Article 6(1)(b) GDPR.

3.3. Issuing tax receipts and keeping records required by Russian tax law – Article 6(1)(c) GDPR is relied on only insofar as the obligation is recognised under Union or Member State law; otherwise Article 6(1)(f) GDPR (the Controller's legitimate interest in complying with the tax law of its country of residence). [Lawyer to confirm.]

3.4. Keeping correspondence to establish, exercise or defend legal claims – Article 6(1)(f) GDPR. The legitimate interest is the Controller's interest in being able to prove the agreed scope, price and payment of orders.

3.5. Where you are also asked for consent under Russian law (a separate consent document is required for the website contact form by Article 9(1) of Russian Federal Law No. 152-FZ), that consent does not replace the legal bases above for the purposes of the GDPR.

You may withdraw it at any time; withdrawal does not affect the lawfulness of processing before withdrawal.

4. Recipients

4.1. Service providers that host the website and the contact form: [provider name, country].

4.2. Email and messaging providers used for correspondence: [e.g. email provider, Telegram – name, country].

4.3. Other individuals engaged by the Controller to perform your order, to the extent necessary: [list, if any].

4.4. The Russian tax authority, which receives transaction information through the "My Tax" application when a receipt is issued.

4.5. Banks and payment service providers that process your payment.

4.6. Public authorities where required by law.

5. Transfers Outside the European Union

5.1. The Controller is located in the Russian Federation, and your personal data are processed there. [Lawyer to confirm the adequacy status of the Russian Federation and whether the direct collection by the Controller constitutes a transfer under Chapter V GDPR.]

5.2. Where Chapter V GDPR applies and no adequacy decision or appropriate safeguards exist, transfers necessary for the performance of a contract between you and the Controller or for pre-contractual measures taken at your request are made under Article 49(1)(b) GDPR.

5.3. Russian law requires personal data of Russian citizens to be recorded and stored in databases located in the Russian Federation (Article 18(5) of Federal Law No. 152-FZ).

6. Retention

6.1. Inquiries that do not lead to an order: up to 12 (twelve) months after the last message, then deleted.

6.2. Order correspondence and contract data: for the term of the contract and three years after its performance (the general limitation period under Article 196(1) of the Russian Civil Code).

6.3. Payment records and receipts: for the period required by Russian tax law [confirm period].

7. Your Rights

7.1. You have the right to access your personal data (Article 15 GDPR), to rectification (Article 16), to erasure (Article 17), to restriction of processing (Article 18), to data portability (Article 20), and to object to processing based on legitimate interests (Article 21).

7.2. Where processing is based on consent, you may withdraw consent at any time (Article 7(3) GDPR).

7.3. You have the right to lodge a complaint with a supervisory authority, in particular in the Member State of your habitual residence, place of work or place of the alleged infringement (Article 77 GDPR).

7.4. To exercise your rights, write to [email].

We respond without undue delay and in any event within one month of receipt; this period may be extended by two further months where necessary, in which case we inform you within the first month (Article 12(3) GDPR).

8. Whether You Must Provide Data

8.1. Providing personal data is voluntary.

Without an email address or Telegram username we cannot reply to your inquiry.

Without the data listed in Clause 2.2 we cannot conclude and perform a contract with you.

9. Automated Decision-Making

9.1. We do not use automated decision-making, including profiling, within the meaning of Article 22 GDPR.

10. Cookies

10.1. The website sets one strictly necessary cookie, "cookie_consent", which stores the visitor's cookie choice ("necessary" or "all") for 12 months.

It contains no personal data and is not used to identify the visitor.

Under Article 5(3) of Directive 2002/58/EC, storage that is strictly necessary to provide a service explicitly requested by the user does not require consent.

10.2. The website does not use cookies or similar technologies for analytics, advertising or tracking.

If such technologies are added, they will be used only after the visitor gives consent in the cookie banner.

The choice can be changed at any time via the "Cookie settings" link at the bottom of the website.

11. Changes

11.1. We may update this Privacy Notice.

The current version and its date are published at [website address]/docs/en/privacy-notice.pdf.