FEDOROFFSALES

CRM Fedoroffsales Privacy Policy

Version of 9 November 2026

1. Who we are

1.1. This Policy describes how Fedoroffsales, Petr Fedoroff, Tbilisi, Georgia (the Operator, we) processes data when operating the online service CRM Fedoroffsales at app.fedoroffsales.pro (the Service). Data contact: fedoroffsales@gmail.com.

1.2. This Policy is part of the Terms of Service. Terms are used as defined there. In case of discrepancies between language versions, the Russian version prevails.

1.3. Roles in processing:

- **account data** of Users (name, email, company name) - we process as the data controller;
- **User Data** - information about clients, contacts and deals that the User enters into the Service - we process on the User's instructions as a processor. The User is the controller of this data;
- in the cases listed in section 3 (anonymised statistics, business contacts, security) we process data on the basis of our own legitimate interest.

2. What data we process

2.1. **Account data:** name, email, company name, interface language, role in the Organization. Passwords are stored only as a secure hash.

2.2. **Technical data:** IP address, browser and device type, login date and time, activity logs, a session cookie.

2.3. **User Data:** companies, contact persons and their contact details, deals, budgets, correspondence and touches, notes, custom fields, uploaded files - everything the User and their employees enter into the Service.

2.4. **Requests:** correspondence with us on support matters.

3. Why we process data

3.1. To provide the Service: registration, login, storing and displaying data, import and export, reminders, bots and integrations.

3.2. To ensure security: protection against hacking and abuse, backup and recovery.

3.3. To provide support and solve technical issues.

3.4. To improve the Service and keep statistics in anonymised and aggregated form.

3.5. To inform about the Service: changes to terms, new features, technical notices.

3.6. To contact companies individually on our own business matters, in the manner and with the limitations set out in section 6 of the Terms of Service.

3.7. To comply with the law.

3.8. To detect and prove violations of the Terms of Service, including Copying the Service (section 8 of the Terms), and to protect the Operator's rights, including in court and before public authorities.

4. Legal bases

We process data on the basis of: the contract with the User (Terms of Service); the User's instructions - for User Data; our legitimate interest - for security, statistics, improving the Service and business contacts; consent - where required by law; legal obligations.

5. Cookies

The Service uses only a necessary session cookie, without which login is impossible. The chosen interface language is saved in the browser. No advertising or third-party trackers are used in the Service.

6. Where and how data is stored

6.1. Data is stored on servers in Hetzner Online GmbH data centers in the European Union.

6.2. We protect data: connections are encrypted (HTTPS), passwords are hashed, each Organization's data is isolated, Operator staff access is limited and logged, backups are made daily.

6.3. By using the Service, the User agrees to data being stored and processed outside their country. The User assesses whether using the Service complies with the laws of their country, including rules on where personal data must be stored.

7. Who we share data with

7.1. We do not sell data and do not transfer Users' client databases to third parties.

7.2. Data may be available only to:

- providers who help us operate, to the extent necessary for their tasks: hosting (Hetzner Online GmbH) and, when the relevant features are enabled, email delivery services, Telegram (for bots) and artificial intelligence technology providers (only to the extent of the request the User sends to an AI feature);
- public authorities - where required by law;
- a successor of the Operator - in case of reorganisation or transfer of the Service, subject to this Policy.

8. Retention

8.1. Account data and User Data are kept while the account or Organization exists.

8.2. After an Organization is deleted, data is removed from the working database within 30 days and from backups within 90 days.

8.3. Technical logs are kept for up to 12 months. Anonymised statistics may be kept indefinitely.

9. Rights

9.1. The User may request information about their data, correct, export and delete it, restrict or object to processing, and withdraw consent where processing is based on consent.

9.2. If you are a client or contact person of a company that uses the Service, please contact that company first about your data. You may also write to us: we will forward your request to the company or handle it ourselves if it concerns our own processing, including business contacts. You may opt out of being contacted by us at any time.

9.3. Send requests to fedoroffsales@gmail.com. We respond within 30 days.

9.4. You may lodge a complaint with the Personal Data Protection Service of Georgia or the data protection authority of your country.

10. Children

The Service is not intended for persons under 18.

11. Changes to this Policy

We may update this Policy by publishing a new version at fedoroffsales.pro and app.fedoroffsales.pro. We notify of material changes in the Service or by email.

12. Contacts

Fedoroffsales, Petr Fedoroff, Tbilisi, Georgia Email: fedoroffsales@gmail.com Telegram: @fedoroffsales Website: fedoroffsales.pro