



PRIVACY AND PERSONAL DATA PROCESSING POLICY OF SETUP.APP

1. Introduction

1.1. This Privacy Policy (hereinafter – the “Policy”) describes how the Setup.app project (hereinafter – the “Service”, “we”) collects, uses, processes, and stores users’ personal data, as well as explains data subjects’ rights.

1.2. This Policy is developed in accordance with the General Data Protection Regulation (GDPR) and other applicable international and national legislation.

1.3. By using our Telegram bot and/or website, you confirm that you have read this Policy and accept its terms.

1.4. We reserve the right to periodically update this Policy. It takes effect from the moment of publication. The current version will be published in the Telegram bot or on the website, if one is used.

2. Data Controller

2.1. The processing of personal data is managed by the Setup.app team.

2.2. For questions related to privacy, you may contact us at support@setup.app.

3. Types and Categories of Collected Data

3.1. When using the Service, the following data may be processed:

- * Telegram ID, username, and display name;
- * interface language, profile photo (if available);
- * interaction history, including commands, messages, bot responses;
- * information voluntarily submitted through forms or messages.

3.2. When using paid features, the following additional data may be processed:

- * email address;
- * transaction details (excluding storage of payment credentials);
- * IP address, device type, and operating system.

3.3. We do not collect special categories of personal data under Article 9 GDPR (biometric, medical, political, or other sensitive data).

4. Purposes of Processing

4.1. We process personal data solely for the following purposes:

- * provision and support of the Service functionality;
- * user identification and fraud prevention;
- * feedback and technical support;
- * analytics and optimization of the bot's operation;
- * compliance with legal and tax obligations.

5. Legal Grounds for Processing

5.1. We process personal data based on the following legal grounds under Article 6 of the GDPR:

- * the data subject's consent;
- * performance of a contract (service provision);
- * compliance with legal obligations;
- * legitimate interests of the Service (e.g., abuse prevention).

6. Data Sharing and Third-Party Access

6.1. Data access may be granted to:

- * project team members, strictly within the scope of their duties;
- * third-party services providing infrastructure (hosting, AI models, analytics);

6.2. All partners and contractors are required to comply with confidentiality obligations and ensure data protection at a level not lower than that established by law.

6.3. In the case of cross-border data transfers outside the EEA, we ensure GDPR compliance, including the conclusion of Standard Contractual Clauses.

7. Data Retention

7.1. The data retention period depends on the purpose of processing and legal requirements. We store personal data only as long as necessary for the purposes it was collected or as required by law. Approximate retention periods by category:

- * Telegram identifiers and command history – up to 12 months from the last use;
- * Support requests – up to 6 months after the conversation ends;
- * Financial and registration data – up to 5 years for accounting and tax purposes;
- * Personalized settings and cookies – up to 2 years, depending on file type and purpose.

7.2. After the expiration of the retention period, data is deleted or anonymized.

8. Data Subject Rights

8.1. In accordance with the GDPR, you have the right to:

- * access your personal data;
- * request correction or update of your information;
- * request deletion ("right to be forgotten");
- * restrict processing;
- * request data portability to another controller;
- * object to processing;
- * file a complaint with a data protection supervisory authority.

8.2. Rights may be exercised by contacting support@setup.app. A response will be provided within 30 calendar days.

9. Security

9.1. We implement technical and organizational measures to protect personal data, including:

- * data encryption during transmission;
- * role-based access restrictions;
- * activity auditing;
- * regular system component updates.

9.2. Despite our efforts, we cannot guarantee absolute protection against all potential threats, but we strive to minimize risks.

10. Use of Cookies and Tracking Technologies

10.1. Our Service may use cookies and similar technologies to:

- * retain user preferences;
- * collect aggregated statistics;
- * personalize functionality.

10.2. Cookies may be mandatory (e.g., technical) or optional (e.g., marketing, analytics).

10.3. Users may configure or restrict the use of cookies through browser settings or Telegram interface if such functionality is provided.

10.4. We do not use cookies for direct profiling or advertising without the user's consent.

11. Final Provisions

11.1. All provisions of this Policy apply to the fullest extent permitted by applicable law.

11.2. Any disputes related to data processing shall be subject to preliminary pre-trial resolution.

11.3. If any provision of the Policy is found invalid, it does not affect the validity of the remaining provisions.

11.4. The User is required to periodically review the current version of the Policy.