LangiaFlow Personal Data Processing Policy

Revision of 09 November 2026 · Updated to describe the current enquiry form

1. Controller and contacts

1.1. The controller is Maksim Sergeevich Agafonov (Агафонов Максим Сергеевич), an individual applying the Russian NPD tax regime, taxpayer ID (INN) 667805799009. LangiaFlow is the name of a project and is not a separate legal entity.

1.2. Privacy enquiries: maxim700a@gmail.com. The postal address disclosed in the earlier policy is 3A Krasnaya Sosna Street, Moscow, Russian Federation; the controller must verify that this address is still current.

2. People, information and purposes

2.1. The enquiry form is for adults seeking lessons for themselves or, as a parent or legal representative, for a child. Children's personal information is not required in the public form.

2.2. The form collects the person's name, contact details (phone, email or Telegram username), selected language (Slovak, German, English or another), learning goal, date/time of the enquiry and consent/version information. Server handling may involve IP addresses, browser details and technical request logs.

2.3. The data is used to respond to enquiries, discuss available formats and lessons, arrange a consultation and protect the form from abuse. It is not used for marketing messages without a separate lawful basis.

3. Legal basis and processing

3.1. Submitted personal information is processed with the visitor's separate consent. Other lawful grounds under applicable legislation may also apply.

3.2. Processing may include collection, recording, organisation, storage, use, correction, limited transfer, restriction, deletion and destruction, whether automated or manual.

3.3. The public form does not seek sensitive or biometric personal data.

4. Technical delivery and recipients

4.1. When live enquiries are enabled, the visitor's browser sends information over HTTPS to a Cloudflare Worker. The request may then be sent through the Telegram Bot API to a private chat controlled by the operator.

4.2. Cloudflare and Telegram may operate infrastructure outside Russia. Before enabling this workflow for Russian citizens' personal information, the controller must assess Russian data localisation, notification and cross-border transfer requirements. The description of the workflow is not confirmation that compliance steps have been completed.

4.3. In particular, applicable requirements under Articles 12, 18 and 22 of Russian Federal Law No. 152-FZ must be satisfied before the relevant collection or transfers begin.

4.4. Teachers are not permitted to use submitted contacts for their independent marketing. Any transfer required to conduct paid lessons must have an appropriate legal basis and be properly disclosed.

5. Retention and safeguards

5.1. Information in enquiries that do not lead to services is to be deleted no later than 90 calendar days after the last interaction, unless a different retention period is required by law. This applies, to the extent controllable, to used messaging channels as well.

5.2. Access controls, secure connections, account safeguards and retention limits are applied as appropriate to the infrastructure actually used.

6. Cookies and external resources

6.1. Essential technical features may be used for the operation of the website. Additional analytics, advertising or mailing services require separate legal grounds and disclosure.

6.2. Loading fonts or other assets from external services may create technical network requests; these data flows should be evaluated before launch.

7. Individual rights

7.1. Depending on applicable law, people may request information about processing, corrections, deletion, restriction or withdrawal of consent by writing to maxim700a@gmail.com.

7.2. The controller may verify identity when necessary and handles valid requests within the statutory time limits.

8. Updates

8.1. The current edition is published on the website and should be updated if the purposes, data categories, technical providers or processing methods change.

8.2. This English version is provided for convenience. Where Russian law governs and texts conflict, the Russian version prevails.