

COMEXP

# Privacy Policy

Effective date: **19.06.2026**    Last updated: **19.06.2026**

## 1. Introduction

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Comexp ("we," "our," or "us") is committed to protecting your privacy and being transparent about how we collect, use, and protect your information. This Privacy Policy explains our data handling practices for both our website and our mobile application, which operate through our shared infrastructure.

### CONTACT INFORMATION

Comexp

Email: [tape@comexp.net](mailto:tape@comexp.net)

Website: <https://comexp.net>

## 2. Information We Collect

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### 2.1 Authentication information

We use third-party authentication services (Telegram and Google) to verify your identity. Through these services, we may obtain:

- Your user identifier from the authentication platform
- Display name or username
- Profile photo (when provided by the platform)
- Email address (if included in the authentication scope)

### 2.2 Email address (optional)

You may optionally provide an email address through your account dashboard for communication purposes.

### 2.3 Data you upload

When you use our machine learning service, you may upload your own data, including:

- Images and video
- Text annotation files for your data

We retain the data you upload as a technical necessity for providing our services — to annotate it, to train and retrain machine learning models, and for automatic annotation. Your data is stored until you delete it or your account, after which it is immediately and irrevocably removed from our active systems.

### 2.4 Usage information

During use, we collect basic usage information to support our functionality, such as:

- Usage patterns
- Error logs and diagnostic information

## 3. How We Use Your Information

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### 3.1 Service provision

- **Authentication:** to verify your identity and maintain your account
- **Data upload and annotation:** to receive the data you upload and provide tools to annotate it
- **Model training:** to fine-tune and retrain a machine learning model of your chosen type, depending on your chosen tariff
- **Automatic annotation:** to automatically annotate your data using our machine learning model tools

### 3.2 Communication

- **Service notifications:** to send important account information, including subscription status, payment notifications, security alerts, and service updates
- **Optional updates:** to send product updates, feature announcements, and tips (only with your explicit consent and where applicable)

### 3.3 Service improvement

- To analyze usage patterns and improve our services
- To resolve technical issues
- To ensure the security and stability of the service

## 4. Our Machine Learning Features

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The core functionality of our service is provided through the service site at [ml.comexp.net](https://ml.comexp.net).

### 4.1 Data upload and annotation

You can upload your own data — images, video, and text annotation files — and annotate it using the tools we provide. Uploaded data is retained to enable the service to work for you.

### 4.2 Model fine-tuning and retraining

You can fine-tune or retrain our machine learning model of your chosen type. The available model type depends on your chosen tariff.

### 4.3 Automatic annotation

You can automatically annotate your data using our machine learning model tools.

## 5. Data Sharing and Disclosure

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### 5.1 Third-party service providers

We may share limited information with trusted service providers who help us operate our service, including:

- Authentication services (Telegram, Google)

These providers are bound by confidentiality agreements and may use your information only to provide services to us.

### 5.2 Legal requirements

We may disclose your information if required by law, legal process, or to:

- Comply with legal obligations
- Protect our rights or property
- Investigate potential violations of our terms
- Protect the safety of our users or the public

### 5.3 No sale of personal data

We do not sell, rent, lease, or otherwise transfer your personal information to third parties.

## 6. Data Security

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We implement appropriate technical and organizational measures to protect your personal information, including:

- Encryption of data in transit and at rest
- Regular security assessments
- Access controls and authentication requirements
- Secure data processing environments

## 7. Data Retention and Deletion

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### 7.1 Account information

We retain your account information for as long as your account remains active or as needed to provide services.

### 7.2 Uploaded data

The data you upload (images, video, annotations) is retained as a technical necessity for providing services and is deleted when you delete this data or your account.

### 7.3 Communication preferences

Email preferences and communication history (if applicable) are retained in accordance with legal requirements and the status of your account.

### 7.4 User-controlled deletion

You retain full control over your data through your account dashboard and can:

- Delete the data you have uploaded at any time
- Delete your optional email address
- Delete your entire account and associated data
- Update your communication preferences

When you delete data, it is immediately and irrevocably removed from our active systems.

## 8. Your Rights and Choices

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### 8.1 Access and control

You have the right to:

- Access the personal information we hold about you
- Correct inaccurate or incomplete information
- Delete your personal information (subject to legal retention requirements)
- Export your data in a portable format in accordance with EU regulations
- Object to certain processing activities

### 8.2 Communication preferences

You can control how we communicate with you:

- **Essential communications:** required for the operation of the service (cannot be disabled while the account is active)
- **Marketing communications:** entirely optional and can be disabled at any time
- **Unsubscribe:** available in all marketing emails with immediate effect

### 8.3 Authentication data

Since we use third-party authentication, you can manage your authentication settings directly through the privacy settings of Telegram or Google.

## 9. International Data Transfers

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Your information may be transferred to and processed in countries other than your country of residence. We ensure that appropriate safeguards are in place to protect your information during such transfers, including:

- Standard contractual clauses
- Adequacy decisions
- Other lawful transfer mechanisms

## 10. Legal Basis for Processing (GDPR)

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If you are located in the European Economic Area, our legal basis for processing your personal information includes:

- **Contractual necessity:** to provide the services you have requested
- **Legitimate interests:** to improve our services and ensure security
- **Consent:** for optional communications and features (which you can withdraw at any time)

## 11. California Privacy Rights (CCPA)

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If you are a California resident, you have additional rights, including:

- The right to know what personal information we collect and how it is used
- The right to delete personal information (with some exceptions)
- The right to opt out of the sale of personal information (note: we do not sell personal information)
- The right to non-discrimination for exercising these rights

To exercise these rights, contact us using the information provided in Section 13.

## 12. Changes to This Privacy Policy

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We may update this Privacy Policy from time to time to reflect changes in our practices or legal requirements. We will:

- Publish the updated policy on our website and in our application
- Update the "Last updated" date
- Notify you of material changes by email (if you have provided an email address) or through our service
- For significant changes, we may request your renewed consent if required by law

## 13. Contact Us

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If you have questions, comments, or requests regarding this Privacy Policy or our data handling practices, please contact us:

EMAIL  
[comexpresearchlab@gmail.com](mailto:comexpresearchlab@gmail.com)

For specific privacy requests (access, deletion, correction), please include:

- Information to verify your identity in our systems, such as your contact information, email, or API key
- A description of your request

We will respond to your privacy requests within 30 days (or as required by applicable law).

## 14. Privacy Rights in the Russian Federation

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If you are a resident of the Russian Federation, additional privacy protections apply to you in accordance with Russian law.

### 14.1 Federal Law on Personal Data

Our processing of personal data complies with Federal Law No. 152-FZ "On Personal Data" of July 27, 2006. We operate as a registered personal data operator in accordance with Russian law.

### 14.2 Data localization

In accordance with Russian data localization requirements, the personal data of Russian citizens is stored on servers physically located within the territory of the Russian Federation during collection and processing.

### 14.3 Registration with Roskomnadzor

Our company (LLC) is registered with Roskomnadzor (the Federal Service for Supervision of Communications, Information Technology, and Mass Media) as a personal data operator in accordance with the requirements of Federal Law No. 152-FZ.

### 14.4 Cross-border data transfers

The personal data of Russian citizens is not transferred across borders. All processing and storage of personal data is carried out exclusively within the territory of the Russian Federation, ensuring full compliance with Russian data localization requirements.

### 14.5 Additional rights under Russian law

In addition to the rights listed in Section 8, residents of Russia have the following rights in accordance with Federal Law No. 152-FZ:

- **Right to information:** you have the right to obtain confirmation of whether we process your personal data and, if so, to receive information about the processing
- **Right to withdraw consent:** you may withdraw your consent to the processing of personal data at any time by contacting us using the methods specified in Section 13
- **Right to blocking:** you have the right to request the blocking of your personal data if it is inaccurate, outdated, or obtained unlawfully
- **Right to destruction:** you have the right to request the destruction of your personal data in cases where it has been processed unlawfully or the purpose of processing has been achieved
- **Right to appeal:** you have the right to appeal our actions or inaction to Roskomnadzor or to a court if you believe your rights have been violated

### 14.6 Response timeframes

For requests from Russian citizens, we will respond within the timeframes required by Russian law, which may differ from the 30-day period specified in Section 13 for other jurisdictions.