

# Personal Data Processing Policy for Telegram Bot @igspyrobot

Version dated 18.03.2026

## 1. General provisions

1.1. This Personal Data Processing Policy (the Policy) defines the procedure for processing and protecting the personal data of users of Telegram bot @igspyrobot (the Bot) and has been prepared with due regard to the requirements of the legislation of the Russian Federation on personal data.

1.2. The personal data operator is Быченков Александр Сергеевич (the Operator).

1.3. Operator contact details:

- Telegram support: @igspytech\_bot
- E-mail: sashabychenkov1@rambler.ru
- Taxpayer identification number: 890307170001
- Primary state registration number: 1027700132195

1.4. This Policy applies to all information that the Operator receives from the user or about the user when using the Bot, contacting support, and paying for services, if the relevant functionality is available in the Bot.

1.5. Starting to use the Bot, sending requests through the Bot, or contacting support means that the user has read this Policy. If the user does not agree with its terms, the user must stop using the Bot.

1.6. The current version of the Policy shall be published at <https://t.me/igspyrobot> or another public internet address specified by the Operator.

## 2. Terms

2.1. Personal data means any information relating directly or indirectly to an identified or identifiable natural person.

2.2. Processing of personal data means any action performed with personal data, including collection, recording, systematization, storage, clarification, use, transfer, blocking, deletion, and destruction.

2.3. User means an individual using the Bot.

2.4. Operator means a person independently organizing and carrying out the processing of personal data and determining the purposes of processing, the scope of personal data, and the actions performed with such data.

### **3. What data is processed**

3.1. The Operator may process the following user data:

- Telegram user identifier;
- Telegram username;
- first and last name, if provided by Telegram;
- interface language;
- selected time zone;
- user settings in the Bot, including sending files and sending without captions;
- information about actions in the Bot: download requests, active subscriptions to Instagram profiles, history of items sent to the user, and limit statuses;
- payment and subscription information: payment identifiers, payment status, selected plan, and subscription period;
- support requests and any other data voluntarily provided by the user.

3.2. If the user voluntarily provides additional data, such as an e-mail address for contact, the Operator may process such data to the extent necessary to reply to the request.

3.3. The Operator does not request from the user:

- the Instagram password;
- Instagram session data and other session-related data;
- proxy server credentials.

3.4. If the user independently sends such data to support, the Operator may delete it without processing if it is not required for the lawful purpose of the request.

3.5. In order to process user requests, the Bot may also temporarily process usernames and links to public Instagram content sent by the user. Such data is used only to fulfill the user request and to operate the public profile tracking functions.

### **4. Purposes of personal data processing**

4.1. Personal data is processed for the following purposes:

- operation of the Bot and delivery of its functions to the user;
- execution of download requests and subscriptions;
- maintaining user settings, plans, limits, payments, and history;
- user support and request processing;
- accounting, legal, and security purposes;
- prevention of abuse, technical failures, and duplicate deliveries.

## **5. Legal grounds for processing**

5.1. Personal data is processed on the basis of:

- user consent;
- the need to process data for entering into and performing an agreement with the user;
- fulfillment of obligations established by the legislation of the Russian Federation;
- legitimate interests of the Operator, provided that such processing does not violate the user's rights and freedoms.

## **6. Procedure and conditions of processing**

6.1. Processing is carried out both with and without automation tools.

6.2. The Operator takes the necessary legal, organizational, and technical measures to protect personal data from unauthorized or accidental access, alteration, disclosure, blocking, copying, provision, distribution, destruction, and other unlawful actions.

6.3. The following may be used for the operation of the Bot:

- Telegram as a messaging platform;
- server infrastructure and databases of the Operator or its contractors;
- payment providers and Telegram payments, if connected in the Bot;
- Google interfaces and Google Sheets only when used as an import or compatibility layer;
- other technical contractors necessary for operating the service.

6.4. Temporary files created for downloading media are stored for a limited period and deleted after the task is completed or during scheduled cleanup.

6.5. The Operator follows the principles of data minimization and storage limitation and does not process excessive data or data unrelated to the purposes of processing without a lawful basis.

## **7. Transfer of data to third parties**

7.1. The Operator may transfer data to third parties only to the extent necessary for the operation of the Bot and fulfillment of obligations to the user.

7.2. Data may be transferred:

- to hosting and technical contractors supporting the Bot;
- to payment providers and Telegram to the extent necessary for payment;
- to state authorities in cases required by law.

7.3. Due to the use of Telegram and other external services, cross-border data transfer may occur to the extent necessary for the operation of the Bot.

## **8. Data retention periods**

8.1. Personal data is stored no longer than required by the purposes of processing, the terms of the agreement with the user, and legal requirements.

8.2. User account data, settings, subscription history, limits, and payments may be stored during the period of use of the Bot and for a reasonable period thereafter for accounting, legal, and technical purposes.

8.3. Support requests and technical logs may be stored for the period necessary to investigate incidents, protect the Operator's interests, and comply with the law.

## **9. User rights**

9.1. The user has the right to:

- obtain information about the processing of personal data;
- request clarification, blocking, or deletion of data if it is incomplete, outdated, inaccurate, or processed unlawfully;
- withdraw consent to the processing of personal data;
- file complaints with competent authorities and protect rights in court.

9.2. To exercise these rights, the user may send a request:

- in Telegram: @igspytech\_bot
- by e-mail: sashabychenkov1@rambler.ru

9.3. The Operator may request information necessary to identify the user and confirm authority to receive a response if the request cannot be processed without such identification.

## **10. Security**

10.1. The Operator takes reasonable measures to prevent the disclosure of secrets and sensitive technical data.

10.2. The Operator does not publish or intentionally transfer:

- tokens;
- session data;
- proxy server credentials;
- other technical secrets not intended for public disclosure.

10.3. Users are also advised not to send such data through the Bot or to support.

## **11. Amendments to the Policy**

11.1. The Operator may amend this Policy unilaterally.

11.2. The new version takes effect from the moment of publication unless otherwise stated in the new version itself.

11.3. Continued use of the Bot after publication of the new version of the Policy means the user agrees with its terms.

## **12. Operator details and contacts**

Operator: Быченков Александр Сергеевич

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- E-mail: sashabychenkov1@rambler.ru
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