

e-promo group

Personal Data Processing Policy

1. General Provisions

1.1 This Policy defines the procedure for processing personal data and measures to ensure the security of personal data in E-Promo Group Management Company LLC (hereinafter referred to as the Company) in order to protect the rights and freedoms of a person and citizen when processing his or her personal data.

1.2 The personal data processing policy in the Company has been developed in accordance with Federal Law No. 152-FL of July 27, 2006 "On Personal Data".

1.3 This Policy is a public document reflecting the Company's system of views on the processing of information containing citizens' personal data. The Policy is published on the Company's corporate website in accordance with Part 2 of Article 18.1 of Federal Law No. 152-FL of July 27, 2006 "On Personal Data").

1.4 The Policy is mandatory for all Company employees who have access to information containing personal data, as well as persons working with information belonging to the Company within the framework of concluded agreements and contracts.

1.5 The Policy applies to all personal data of subjects processed in the Company's information system using automation tools.

1.6 The Company and other persons who have gained access to personal data are obliged to comply with the terms of confidentiality in relation to them, namely, not to disclose (provide) to third parties and not to distribute personal data without the consent of the subject of personal data unless otherwise provided by federal law.

2. Principles and conditions for processing personal data

2.1 The processing of personal data in the Company is carried out based on the following principles:

- legality and fair basis;
- limiting the processing of personal data to the achievement of specific, predetermined and legitimate purposes;
- preventing the processing of personal data incompatible with the purposes of collecting personal data.
- preventing the merging of databases containing personal data, the processing of which is carried out for purposes incompatible with each other;
- processing only those personal data that meet the purposes of their processing;
- compliance of the content and volume of processed personal data with the stated purposes of processing;
- preventing the processing of excessive personal data in relation to the stated purposes of their processing;
- ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of

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processing personal data;

– destruction or depersonalization of personal data upon achieving the purposes of their processing or in the event of loss of the need to achieve these purposes, if the Company is unable to eliminate the violations of personal data committed, unless otherwise provided by federal law.

2.2 The Company processes personal data only with the consent of the personal data subject to the processing of his/her personal data.

2.3 The Company does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, health status, or intimate life.

2.4 The company has the right to entrust the processing of personal data to another person with the consent of the subject of personal data, unless otherwise provided by federal law, on the basis of an agreement concluded with this person. A person processing personal data on behalf of the Company is obliged to comply with the principles and rules for processing personal data provided for by Federal Law No. 152.

3. Rights of the subject of personal data

3.1 The subject of personal data decides to provide his personal data and consents to their processing freely, of his own free will and in his own interest. Consent to the processing of personal data can be given by the subject of personal data or his representative in any form that allows confirmation of the fact of its receipt, unless otherwise provided by federal law.

3.2 The subject of personal data has the right to receive information regarding the processing of his personal data, unless such right is limited in accordance with federal laws. The subject of personal data has the right to demand from the Company clarification of his personal data, blocking or destruction of it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as take measures provided by law to protect his rights.

3.3 Processing of personal data for the purpose of promoting goods, works, services on the market by making direct contacts with potential consumers using communication means, as well as for the purposes of political propaganda, is permitted only with the prior consent of the subject of personal data. The specified processing of personal data is considered to be carried out without the prior consent of the subject of personal data, unless the Company proves that such consent has been obtained.

3.4 The Company is obliged to immediately stop, at the request of the personal data subject, the processing of his personal data for the above purposes.

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4. Ensuring the security of personal data

4.1 The goals of ensuring information security are to minimize damage from the implementation of threats to information security and to improve the business reputation and to corporate culture of the Company.

4.2 Information is an important asset of the Company and its protection is the responsibility of each employee allowed to process it.

4.3 Ensuring the protection of information containing personal data means maintaining its confidentiality, integrity and availability.

4.4 The security of personal data processed by the Company is ensured by the implementation of legal, organizational, technical and program measures necessary and sufficient to ensure the requirements of federal legislation in the field of personal data protection.

4.5 Access to information containing personal data is provided only to persons who need it to fulfill official or contractual obligations to the minimum required extent.

4.6 For each information resource, a responsible person is determined who is responsible for providing access to it and for the effective functioning of information protection measures.

4.7 The Company has developed and approved a package of documents on the protection of personal data.

4.8 The Company annually analyzes the measures taken to protect personal data.

5. Final Provisions

5.1 Other rights and obligations of the Company, as an operator of personal data, are determined by the legislation of the Russian Federation in the field of personal data.

5.2 Officials of the Company guilty of violating the rules governing the processing and protection of personal data, bear personal liability in the manner established by federal laws.