

# Cosmos-Web agency policy regarding processing and security personal data

Novosibirsk, 2020

Page 2

## 1. General Provisions

The personal data processing policy (hereinafter referred to as the Policy) has been developed in accordance with in accordance with the Federal Law of 27.07.2006, No. 152-FZ "On personal data" (hereinafter - FZ-152).

This Policy defines the procedure for processing personal data and measures for ensuring the security of personal data in LLC "New Cosmos" (hereinafter - Operator) in order to protect the rights and freedoms of man and citizen when processing it personal data, including protection of privacy rights, personal and family secrets. The Policy uses the following basic concepts:

- **automated processing of personal data** - processing of personal data using computer technology;
- **blocking of personal data** - temporary termination of processing of the first sleep data (except in cases where processing is necessary to clarify personal data);
- **personal data information system** - a set of contained in the databases of personal data, and ensuring their processing of information onny technologies and technical means;
- **depersonalization of personal data** - actions as a result of which it is impossible to but to determine, without using additional information, the affiliation personal data to a specific subject of personal data;
- **processing of personal data** - any action (operation) or a combination actions (operations) performed using automation tools or without using such means with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extract reading, use, transmission (distribution, provision, access), providing incriminating, blocking, deleting, destroying personal data;
- **operator** - a state body, municipal body, legal or financial a natural person, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data subject to processing, actions (operations) performed with personal data;
- **personal data** - any information relating directly or indirectly to a specific or identifiable individual (subject of personal data);
- **provision of personal data** - actions aimed at disclosing personal data to a certain person or a certain circle of persons;
- **dissemination of personal data** - actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data ny) or to get acquainted with the personal data of an unlimited number of persons, including the disclosure of personal data in the media tion, placement in information and telecommunication networks or granting access to personal data in any other way;
- **cross-border transfer of personal data** - transfer of personal data transferred to the territory of a foreign state to the authority of a foreign state state, foreign natural or foreign legal entity;
- **destruction of personal data** - actions as a result of which it is impossible restore the content of personal data in the information system of the first sleep data and (or) as a result of which material carriers are destroyed personal data.

The company is obliged to publish or otherwise provide unlimited additional stupas to this Policy for the processing of personal data in accordance with Part 2 of Art. 18.1. FZ-152.

Page 3

## 2. Principles and conditions for the processing of personal data

### 2.1. Principles of processing personal data.

The processing of personal data by the Operator is carried out on the basis of the following principles:

- legality and fair basis;
- restrictions on the processing of personal data by achieving specific, in advance specific and legitimate purposes;
- preventing the processing of personal data incompatible with the purposes of collection personal data;
- preventing the unification of databases containing personal data, which are botched 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 application specific processing purposes;
- preventing the processing of personal data that is redundant in relation to the application specific purposes of their processing;
- ensuring the accuracy, sufficiency and relevance of personal data on wearing for the purposes of processing personal data;
- destruction or depersonalization of personal data upon achievement of their goals processing or in case of loss of the need to achieve these goals, if it is not the possibility of elimination by the Operator of violations of personal data, unless otherwise provided by federal law.

### 2.2. Conditions for processing personal data.

The operator processes personal data if at least one of the following conditions:

- processing of personal data is carried out with the consent of the subject of personal data for the processing of his personal data;
- the processing of personal data is necessary to achieve the goals provided for international treaties of the Russian Federation or the law, for implementation and implementation of the legislation of the Russian Federation on the operator of functions, powers and duties;
- the processing of personal data is necessary for the administration of justice, completion of a judicial act, an act of another body or official subject to execution in accordance with the legislation of the Russian Federation on the execution production;
- the processing of personal data is necessary for the performance of the contract by the party which is either the beneficiary or the guarantor of which the subject is set of personal data, as well as for the conclusion of an agreement on the initiative of the subject that personal data or contract, according to which the subject of personal data will be the beneficiary or guarantor;
- the processing of personal data is necessary for the exercise of rights and legal interests of the operator or third parties or to achieve socially significant purposes, provided that this does not violate the rights and freedoms of the subject of the personal data;
- processing of personal data, unlimited access persons to whom the subject of personal data is provided or at his request (hereinafter - publicly available personal data);
- processing of personal data subject to publication or mandatory disclosure in accordance with federal law.

### 2.3. Confidentiality of personal data.

The operator and other persons who have gained access to personal data are obliged not to cover to third parties and not distribute personal data without the consent of the subject eject of personal data, unless otherwise provided by federal law.

Page 4

### 2.4. Publicly available sources of personal data.

In order to provide information, the Operator may create a publicly available new sources of personal data of subjects, including directories and address books. To publicly available sources of personal data with written consent subject may include his last name, first name, patronymic, date and place of birth, due number, contact phone numbers, e-mail address and other personal data communicated by the subject of personal data. Subject information must be excluded from publicly available sources of personal data at any time at the request of the subject or by decision of the court or other authorized state natural organs.

### 2.5. Special categories of personal data.

Processing by the Operator of special categories of personal data concerning-racial, ethnic, political, religious, or philosophical beliefs, state of health, intimate life, is allowed in cases where if a:

- the subject of personal data has given his consent in writing to the processing of his their personal data;
- personal data is made publicly available by the subject of personal data;
- the processing of personal data is carried out in accordance with the legislation statute on state social assistance, labor legislation, law the legislation of the Russian Federation on pensions for state pension security, labor pensions;
- the processing of personal data is necessary to protect life, health or other vital interests of the subject of personal data or life, health or other vital interests of others and obtaining the consent of the subject personal data is impossible;
- processing of personal data is carried out in medical and preventive purposes, in order to establish a medical diagnosis, provide medical and medical co-social services, provided that the processing of personal data is carried out is a person who is professionally engaged in medical activities and obliged in accordance with the legislation of the Russian Federation to keep medical confidentiality;
- processing of personal data is necessary to establish or implement rights of the subject of personal data or third parties, as well as in connection with the exercise by the rule of justice;
- the processing of personal data is carried out in accordance with the legislation the provision on compulsory types of insurance, with insurance legislation.

Processing of special categories of personal data should be immediate but terminated if the reasons for which they were carried out are eliminated work, unless otherwise provided by federal law. Processing of personal criminal record data can be carried out by the Operator only in cases and in the order that are determined in accordance with federal laws.

### 2.6. Biometric personal data.

Information that characterizes the physiological and biological characteristics of human person, on the basis of which it is possible to establish his identity - biometric per-sleep data - can be processed by the Operator only with consent in the writing of the subject.

### 2.7. Ordering the processing of personal data to another person.

The operator has the right to entrust the processing of personal data to another person with the consent the subject of personal data, unless otherwise provided by federal law, on the basis of an agreement concluded with this person. Processor personal data on behalf of the Operator, is obliged to comply with the principles and for the processing of personal data provided for by FZ-152.

Page 5

### 2.8. Cross-border transfer of personal data.

The operator is obliged to make sure that the foreign country, to the territory which is supposed to carry out the transfer of personal data, provides-adequate protection of the rights of subjects of personal data, prior to the commencement of the implementation of such transfer.

Cross-border transfer of personal data on the territory of foreign state donations that do not provide adequate protection of the rights of subjects of personal data, can be carried out in the following cases:

- availability of written consent of the subject of personal data on trans- any transfer of his personal data;
- execution of an agreement to which the subject of personal data is a party.

### 2.9. The storage period for personal data.

The storage period for personal data has not been established.

## 3. Rights of the subject of personal data

### 3.1. Consent of the subject of personal data to the processing of his personal data.

The subject of personal data decides on the provision of his personal data and gives consent to their processing freely, of his own free will and in his interest. Consent to the processing of personal data can be given by the subject of personal data or his representative in any allowing to confirm the fact of his the form, unless otherwise provided by federal law.

The obligation to provide evidence of obtaining the consent of the subject of personal data for the processing of his personal data or proof of the existence of grounds, specified in FZ-152 is assigned to the Operator.

### 3.2. Rights of the subject of personal data.

The subject of personal data has the right to receive information from the Operator, regarding the processing of his personal data, if such a right is not limited in accordance with federal laws. The subject of personal data has the right require the Operator to clarify his personal data, block them or destruction in the event that personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the claimed the purposes of processing, as well as to take legal measures to protect their right.

Processing of personal data in order to promote goods, works, services on the market by making direct contacts with a potential consumer using means of communication, as well as for the purpose of political agitation, is allowed only under the conditions with the prior consent of the subject of personal data. Specified processing personal data is recognized as carried out without prior consent the subject of personal data, if the Company does not prove that such consent was received.

The operator is obliged to immediately stop at the request of the subject of personal data processing of his personal data for the above purposes. Is prohibited acceptance on the basis of exclusively automated processing of personal these decisions, giving rise to legal consequences in relation to the subject of the personal data or otherwise affecting his rights and legitimate interests, with the exception of cases stipulated by federal laws, or if there is written consent of the subject of personal data.

If the subject of personal data believes that the Operator is processing him personal data in violation of the requirements of FZ-152 or otherwise violates his rights and freedoms, the subject of personal data has the right to appeal against actions or inaction of the Operator in the Authorized Body for the Protection of the Rights of Persons data or in court.

Page 6

The subject of personal data has the right to protect his rights and legitimate interests. owls, including for damages and (or) compensation for moral damage judicially.

The User has the right to demand that the Operator clarify, block or destroy removal (deletion) of the personal information provided by him or a part of it in the event that if the personal data is incomplete, outdated, inaccurate or unclear

are necessary for the stated purpose of processing, as well as to take legal measures to protect their rights.

## 4. Ensuring the security of personal data

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

To prevent unauthorized access to personal data, Opera-

the torus applies the following organizational and technical measures:

- appointment of officers responsible for organizing processing and protection personal data;
- limiting the number of persons with access to personal data;
- familiarization of subjects with the requirements of federal legislation and Operator's personal data processing and protection documents;
- organization of accounting, storage and circulation of information carriers;
- identification of threats to the security of personal data during their processing, modeling of threat models based on them;
- development of a personal data protection system based on a threat model;
- checking the readiness and effectiveness of the use of information security tools;
- differentiation of user access to information resources and programs; but-hardware for information processing;
- registration and accounting of actions of users of information systems of personal data;
- use of anti-virus tools and protection system recovery tools personal data;
- use, if necessary, means of firewalling, revealing Intrusion detection, security analysis and cryptographic protection information;
- organization of access control to the territory of the Operator, security of premises with technical means of processing personal data.

## 5. Final provisions

Other rights and obligations of the Operator as a personal data operator are determined are subject to the legislation of the Russian Federation in the field of personal data.

Operator officials guilty of violating the rules governing processing and protection of personal data, bear material, disciplinary, administrative

new, civil or criminal liability in the manner prescribed federal laws.

## 6. Data about the Operator of personal data

- LLC "New Cosmos"
- TIN 5406771250 KPP 540601001
- 630005, Russia, Novosibirsk, st. Frunze, 88, office 1209
- info@cosmos-web.ru