

## 1. GENERAL PROVISIONS

1.1. This Privacy Policy regarding the processing of personal data of users of the site <https://aigolova.com/> (hereinafter referred to as the Policy) defines the general conditions for the collection, processing, storage, transfer and destruction of personal data of Users that can be transferred by the User when using the site <https://aigolova.com/> .

1.2. This Policy has been developed taking into account the requirements of the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation in the field of personal data.

1.3. The Operator has the right to make changes to this Policy by posting a modified version of the Policy on the Site without the consent of the User. Once changes are made, the Policy will apply to previously collected Personal Data only to the extent that it does not imply a reduction in the rights of the affected Individuals .

1.4. This Policy has been developed in accordance with the requirements of clause 2 , part 1, art. 18.1 of the Federal Law of July 27, 2006 N 152-FZ “On Personal Data”.

## 2. BASIC CONCEPTS USED IN POLICY

2.1. Automated processing of personal data – processing of personal data using computer technology .

2.2. Blocking of personal data – temporary cessation of processing of personal data (except for cases where processing is necessary to clarify personal data).

2.3. Website – a website located on the Internet at the address: <https://aigolova.com/>.

2.4. Personal data information system is a set of personal data contained in databases and information technologies and technical means that ensure their processing.

2.5. Depersonalization of personal data - actions as a result of which it is impossible to determine without the use of additional information the ownership of personal data to a specific User or other subject of personal data.

2.6. Processing of personal data - any action (operation) or set of actions (operations) performed using automation tools or without the use of such tools with personal data , including collection , recording , systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.7. Operator – <https://aigolova.com/>

2.8. Personal data – any information relating directly or indirectly to a specific or identified User of the Site <https://aigolova.com/> .

2.9. Personal data authorized by the subject of personal data for distribution - personal data, access to an unlimited number of persons to which is provided by the subject of personal data by giving consent to the processing of personal data authorized by the subject of personal data for distribution in the manner prescribed by the Law on Personal Data (hereinafter - personal data authorized for distribution).

2.10. User – any visitor to the site <https://aigolova.com/>.

2.11. Providing personal data – actions aimed at disclosing personal data to a certain person or a certain circle of persons.

2.12. Dissemination of personal data - actions aimed at disclosing personal data to an indefinite number of persons.

2.13. Cross-border transfer of personal data is the transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

2.14. Destruction of personal data - actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which material media of personal data are destroyed .

### 3. BASIC RIGHTS AND RESPONSIBILITIES

3.1. Basic rights and obligations of the Operator:

3.1.1. The operator has the right:

- receive from the subject of personal data reliable information containing personal data;
- require the subject of personal data to timely clarify the provided personal data.

3.1.2. The operator is obliged:

- process personal data in the manner established by the current legislation of the Russian Federation;
- consider requests from the subject of personal data (his legal representative) regarding the processing of personal data and give reasoned answers;
- provide the subject of personal data (his legal representative) with the opportunity to free access to his personal data;
- take measures to clarify, destroy the personal data of the subject of personal data in connection with his (his legal representative) handling of legal and reasonable demands;
- organize the protection of personal data in accordance with the requirements of the legislation of the Russian Federation.

3.2. Basic rights and obligations of personal data subjects :

3.2.1. The subject of personal data has the right to:

- obtaining complete information about his personal data processed by the operator;
- access to his personal data, including the right to receive a copy of any record containing his personal data, except in cases established by the legislation of the Russian Federation;

- clarification of your personal data, their blocking or destruction in cases where the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing;
- withdrawal of consent to the processing of personal data;
- taking measures to protect their rights in accordance with the legislation of the Russian Federation;
  - appealing the action or inaction of the Operator to the authorized body for the protection of the rights of Personal Data Subjects or in court ;
- to exercise other rights provided for by the legislation of the Russian Federation.

3.2.2. Subjects of personal data are obliged to:

- provide the Operator with only reliable information about yourself;
- inform the Operator about clarification (updating, changing) of your personal data.

3.3. Persons who provided the Operator with false information about themselves or information about another subject of personal data without the latter's consent are liable in accordance with the legislation of the Russian Federation.

3.4. The User has the right to send requests to the Operator for information regarding the processing of his personal data (regarding the use of his personal data).

## 4. LEGAL BASIS FOR PROCESSING PERSONAL DATA

4.1. The legal grounds for the processing of personal data by the Operator are:

- Constitution of the Russian Federation;
- Civil Code of the Russian Federation;
- Federal Law of July 27 , 2006 N 149-FZ “On information, information technologies and information protection ” ;
- Federal Law of July 27, 2006 No. 152-FZ “On Personal Data”;
- Decree of the President of the Russian Federation of March 6 , 1997 N 188 “On approval of the list of confidential information ”;
- Decree of the Government of the Russian Federation of November 1 , 2012 N 1119 “On approval of requirements for the protection of personal data during their processing in personal data information systems ”;
- Order of Roskomnadzor dated September 5 , 2013 N 996 “On approval of requirements and methods for anonymization of personal data”;
- Order of the FSTEC of Russia dated February 18, 2013 N 21 “On approval of the composition and content of organizational and technical measures to ensure the security of personal data during their processing in personal data information systems”;
- statutory documents of the Operator;
- agreements concluded between the Operator and subjects of personal data;

- consent of personal data subjects to the processing of personal data;
- other grounds when consent to the processing of personal data is not required by law .

## 5. VOLUME AND CATEGORIES OF PERSONAL DATA PROCESSED, CATEGORIES OF PERSONAL DATA SUBJECTS

5.1. The operator may process personal data of the following categories of subjects:

- counterparties under civil contracts (individuals );
- Site visitors .

5.2. Personal data processed by the Operator includes :

- email address (e-mail) ;
- history of requests, views and actions on the Sites and its services, date and time of the session;
- IP address, location information, device type, information about the user's browser (or other program through which the Site is accessed );

5.3. The operator ensures that the content and scope of the processed personal data corresponds to the stated purposes of processing and, if necessary, takes measures to eliminate their redundancy in relation to the stated purposes of processing.

5.4. The Processing of special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, intimate life is not carried out by the Operator .

5.5. The Operator does not carry out cross-border transfer of personal data .

5.6. The Operator does not process payments and information about the User's bank card when making a payment.

## 6. PURPOSES OF COLLECTING PERSONAL DATA

6.1. Personal data is processed by the Operator for the following purposes:

- identification of the User to use the Site;
- providing the User with access to personalized resources of the Site;
- conclusion of any contracts with subjects of personal data and their further execution;
- Conducting promotions, surveys, interviews, testing and research on the Site by the Operator ;
- feedback from subjects of personal data, including processing of their requests and appeals, informing about the operation of the Site;

- monitoring and improving the quality of services and services of the Site, including those offered on the Site;
- generation of statistical reporting;
- implementation of other functions, powers and duties assigned to the Operator by the legislation of the Russian Federation.

6.2. The Operator also has the right to send notifications to the User about new products and services, special offers and various events. The User can always refuse to receive information messages through the functionality of the corresponding section of the User's personal account on the website <https://aigolova.com/>.

6.3. Anonymized data of Users, collected using Internet statistics services, serves to collect information about the actions of Users on the site, improve the quality of the site and its content.

## 7. PROCEDURE AND CONDITIONS FOR PROCESSING PERSONAL DATA

7.1. The processing of personal data provided by the User is carried out by the operator using automation tools .

7.2. The Operator collects, records, systematizes, accumulates, stores, refines (updates, changes), extracts, uses, transfers (distribute, provide, access), depersonalizes, blocks, deletes and destroys the User's personal data.

7.3. The operator processes personal data subject to obtaining the consent of the subject of personal data (hereinafter referred to as the Consent), with the exception of cases established by the legislation of the Russian Federation when the processing of personal data can be carried out without such Consent.

7.4. Consent to the processing of personal data (Appendix No. 1) and consent to receive newsletters and promotional materials (Appendix No. 2) is provided by the User in electronic form in one of the following ways:

- 7.4.1. by clicking on the "I Accept" button or another button with similar content;
- 7.4.2. by placing a sign in the checkbox located on the site;
- 7.4.3. by creating an account on the site or registering on the site in any other way;
- 7.4.4. by logging into the site using email , social networks or other electronic services available for authentication purposes on the site.

7.5. The site uses cookies and collects information about users, including using third party software Yandex.Metrica, Google Analytics , etc., which is necessary for the Operator to analyze the effectiveness and improve the operation of the Site.

The composition and conditions for collecting anonymized data using third- party software are determined directly by their copyright holders and may include:

- Browser data (type, version, cookie);
- Device data and its location ;

- Operating system data (type, version, screen resolution );
- Request data (time, referral source , IP address).

7.6. When visiting websites, the Operator informs users about the collection and use of cookies .

7.7. The condition for terminating the processing of personal data may be the achievement of the purposes of processing personal data, the expiration of the Consent or withdrawal of Consent by the subject of personal data, as well as the identification of unlawful processing of personal data.

7.8. Consent may be revoked by the subject of personal data or his representative by sending a written statement to the Operator

7.9. Consent to the processing of personal data permitted for distribution terminates from the moment the Operator receives the request specified in clause 7.7. of this Policy.

7.10. When processing personal data, the operator takes or ensures the adoption of the necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access to it, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data.

7.11. The storage of personal data is carried out in a form that makes it possible to identify the subject of personal data for a period no longer than required by the purposes of processing personal data, except in cases where the storage period for personal data is established by federal law, an agreement to which a party, beneficiary or guarantor, under which is the subject of personal data.

7.12. When storing personal data , the Operator uses databases located on the territory of the Russian Federation.

## **8. UPDATED, CORRECTED, DELETED AND DESTROYED PERSONAL DATA, ANSWERS TO REQUESTS OF PERSONAL DATA SUBJECTS FOR ACCESS TO PERSONAL DATA**

8.1. If the fact of inaccuracy of personal data or the illegality of their processing is confirmed, the personal data must be updated by the Operator, or their processing must be stopped accordingly.

8.2. The fact of inaccuracy of personal data or illegality of their processing can be established either by the subject of personal data or by the competent government bodies of the Russian Federation.

8.3. In the manner provided for in clause 7.7, the subject of personal data has the right to demand from the Operator clarification of his personal data, their blocking or destruction 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 your rights.

8.4. When the goals of processing personal data are achieved , as well as in the event that the subject of personal data withdraws Consent, personal data is subject to destruction if:

- the operator has no right to carry out processing without the Consent of the subject of personal data;
- otherwise is not provided for by the agreement to which the subject of personal data is a party , beneficiary or guarantor ;
- otherwise is not provided for in another agreement between the Operator and the subject of personal data.

## 9. FINAL PROVISIONS

9.1. All relations relating to the processing of personal data that are not reflected in this Policy are regulated in accordance with the provisions of the legislation of the Russian Federation.

9.2. All information that is collected by payment systems, communications and other service providers is stored and processed by these persons (Operators) in accordance with their User Agreement and Privacy Policy. The subject of personal data and/or the User is obliged to independently familiarize himself with the specified documents in a timely manner . The operator is not responsible for the actions of third parties, including the service providers specified in this paragraph .

9.3. The operator has the right to make changes to this Policy. When changes are made to the current edition, the date of the last update is indicated. The new version of the Policy comes into force from the moment it is posted on the Site, unless otherwise provided by the new version of the Policy. The current edition is constantly available on the Website at : <https://aigolova.com/>.

Appendix No. 1 to the Privacy Policy

## CONSENT TO PROCESSING OF PERSONAL DATA

I, by clicking on the “I Accept” button or another button with similar content and/or putting a sign in the checkbox on the website <https://aigolova.com/> (hereinafter referred to as the Site), or by creating an account on the Site, or by registering on the Site in any other way, or by logging into the Site using email, social networks or other electronic services available for authentication purposes on the Site, acting freely, of your own free will and in your own interest,

I give my consent to the processing of my personal data

1. Consent is given to automated processing of personal data.
2. Consent is given to the processing of the following personal data:
  - E- mail address ;
  - history of requests, views and actions on the Sites and its services, date and time of the session;
  - IP address, location information , device type , information about

- the user's browser (or other program used to access the Company's Website).
3. Personal data is not publicly available.
  4. Personal data is processed by the Operator for the following purposes:
    - identification of the User to use the Site;
    - providing the User with access to personalized resources of the Site;
    - conclusion of any contracts with subjects of personal data and their further execution;
    - Conducting promotions, surveys, interviews, testing and research on the Site by the Operator ;
    - feedback from subjects of personal data, including processing of their requests and appeals, informing about the operation of the Site;
    - monitoring and improving the quality of the Company's services , including those offered on the Site;
    - generation of statistical reporting;
    - implementation of other functions, powers and duties assigned to the Operator by the legislation of the Russian Federation.
  5. This consent is provided to carry out the following operations with personal data using automation tools: collection, recording, systematization, accumulation, storage, clarification (updating, changing), use, transfer, depersonalization, blocking, deletion, destruction.
  6. In the course of working with personal data, the following actions will be performed : collection, recording, systematization, accumulation, storage, clarification (updating, changing), use, transfer (distribution, provision, access), blocking, deletion, destruction.
  7. The operator does not transfer the provided personal data to third parties for processing .
  8. The storage of personal data is carried out for a period no longer than required by the purposes of processing personal data, except in cases where the period for storing personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor .
  9. Consent may be withdrawn by the subject of personal data or his representative by sending a written statement. The date of revocation is considered to be the day following the day of delivery to the Operator of a written application for revocation of the site user's consent to the processing of personal data.
  10. If the subject of personal data or his representative withdraws consent to the processing of personal data, the Operator has the right to continue processing personal data without the consent of the subject of personal data if there are grounds specified in paragraphs 2–11 of part 1 of article 6, part 2 of article 10 and part 2 of article 11 of the Federal Law No. 152-FZ “On Personal Data” dated July 27, 2006.
  11. The consent is valid all the time until the termination of the processing of personal data specified in paragraphs 8 and 9 of the Consent.