

## Personal Data Processing Policy

### 1. General Provisions

This Personal Data Processing Policy has been drawn up in accordance with the requirements of the Federal Law dated 27.07.2006. No 152-FZ "On Personal Data" (hereinafter referred to as the Law on Personal Data) and determines the procedure for processing personal data and measures to ensure the security of personal data taken by **Individual Entrepreneur Ositkovsky Dmitry Sergeevich** (hereinafter referred to as the Operator).

1.1. The Operator sets as its most important goal and condition for the implementation of its activities the observance of human and civil rights and freedoms in the processing of his personal data, including the protection of the rights to privacy, personal and family secrets.

1.2. This Operator's policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator can obtain about visitors to the [https://vostochnik.com/ website](https://vostochnik.com/website).

### 2. Basic Concepts Used in the Policy

2.1. Automated processing of personal data means the processing of personal data using computer technology.

2.2. Blocking of personal data means a temporary suspension of the processing of personal data (except for cases where processing is necessary to clarify personal data).

2.3. Website is a set of graphic and information materials, as well as computer programs and databases that ensure their availability on the Internet at the network address <https://vostochnik.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 shall mean actions as a result of which it is impossible to determine the ownership of personal data by a particular User or other subject of personal data without the use of additional information.

2.6. Personal data processing is any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.7. Operator is a state body, municipal body, legal entity or individual who, independently or jointly with other persons, organizes and/or carries out the processing of personal data, as well as determines the purposes of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data.

2.8. Personal Data – any information relating directly or indirectly to a specific or identifiable User of the <https://vostochnik.com/> Website.

2.9. Personal data allowed by the personal data subject for distribution shall mean personal data to which access to an unlimited number of persons is provided by the personal data subject by giving consent to the processing of personal data permitted by the personal data subject for distribution in the manner prescribed by the Law on Personal Data (hereinafter referred to as personal data permitted for distribution).

2.10. User – any visitor of the [https://vostochnik.com/ website](https://vostochnik.com/website).

2.11. Provision of personal data means actions aimed at disclosing personal data to a certain person or a certain group of persons.

2.12. Distribution of personal data means any actions aimed at disclosing personal data to an indefinite number of persons (transfer of personal data) or at familiarizing an unlimited number of persons with personal data, including the publication of personal data in the media, posting in

information and telecommunication networks or providing access to personal data in any other way.

2.13. Cross-border transfer of personal data shall mean 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 shall mean any actions as a result of which personal data are irretrievably destroyed with the impossibility of further restoration of the content of personal data in the personal data information system and/or tangible media of personal data are destroyed.

### 3. Basic rights and obligations of the Operator

#### 3.1. The Operator has the right to:

- receive reliable information and/or documents containing personal data from the personal data subject;
- if the personal data subject withdraws consent to the processing of personal data, as well as sends an appeal with a request to stop the processing of personal data, the Operator has the right to continue processing personal data without the consent of the personal data subject if there are grounds specified in the Law on Personal Data;
- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations provided for by the Law on Personal Data and the regulations adopted in accordance with it, unless otherwise provided by the Law on Personal Data or other federal laws.

#### 3.2. The Operator shall:

- to provide the personal data subject with information regarding the processing of his personal data at his request;
- organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;
- respond to requests and requests from personal data subjects and their legal representatives in accordance with the requirements of the Law on Personal Data;
- report the necessary information to the authorized body for the protection of the rights of personal data subjects at the request of this body within 10 days from the date of receipt of such request;
- publish or otherwise provide unrestricted access to this Policy in relation to the processing of personal data;
- take legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data;
- to stop the transfer (distribution, provision, access) of personal data, to stop processing and destroy personal data in the manner and in cases provided for by the Law on Personal Data;
- perform other duties provided for by the Law on Personal Data.

### 4. Basic rights and obligations of personal data subjects

#### 4.1. Personal data subjects have the right to:

- to receive information regarding the processing of his/her personal data, except as provided for by federal laws. The information is provided to the personal data subject by the Operator in an accessible form, and it should not contain personal data related to other personal data subjects, except for cases where there are legal grounds for the disclosure of such personal data. The list of information and the procedure for obtaining it are established by the Law on Personal Data;

- require the operator to clarify his personal data, block or destroy them if the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, as well as take measures provided for by law to protect his rights;
  - put forward the condition of prior consent when processing personal data in order to promote goods, works and services on the market;
  - to withdraw consent to the processing of personal data, as well as to send a request to stop the processing of personal data;
  - to appeal to the authorized body for the protection of the rights of personal data subjects or in court against the Operator's illegal actions or inaction in the processing of his personal data;
  - to exercise other rights provided for by the legislation of the Russian Federation.
- 4.2. Personal data subjects are obliged to:
- provide the Operator with reliable data about himself/herself;
  - inform the Operator about the clarification (update, change) of their personal data.
- 4.3. Persons who have provided the Operator with inaccurate information about themselves, or information about another personal data subject without the consent of the latter, are liable in accordance with the legislation of the Russian Federation.

## 5. Principles of personal data processing

- 5.1. The processing of personal data is carried out on a legal and fair basis.
- 5.2. The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. It is not allowed to process personal data that is incompatible with the purposes of collecting personal data.
- 5.3. It is not allowed to combine databases containing personal data, the processing of which is carried out for purposes incompatible with each other.
- 5.4. Only personal data that meet the purposes of their processing are subject to processing.
- 5.5. The content and volume of the processed personal data correspond to the stated purposes of processing. Redundancy of processed personal data in relation to the stated purposes of their processing is not allowed.
- 5.6. When processing personal data, the accuracy of personal data, their sufficiency, and, if necessary, relevance in relation to the purposes of personal data processing are ensured. The Operator shall take the necessary measures and/or ensure that they are taken to delete or correct incomplete or inaccurate data.
- 5.7. Personal data shall be stored in a form that makes it possible to identify the personal data subject for no longer than required by the purposes of personal data processing, unless the personal data storage period is established by a federal law, an agreement to which the personal data subject is a party, beneficiary or guarantor. Processed personal data shall be destroyed or depersonalized upon achievement of the purposes of processing or if there is no longer a need to achieve these goals, unless otherwise provided for by federal law.

## 6. Purposes of personal data processing

Purpose of processing	To provide and improve our services, programs, and initiatives; to communicate with users, respond to inquiries and provide relevant information to our customers; personalize the user experience and tailor content based on customer interests and preferences; In order to administer the company's events,
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	programs and activities, to comply with legal and regulatory requirements, to provide visa support
Personal data	<ul style="list-style-type: none"> <li>• Surname, first name, patronymic</li> <li>• Email address</li> <li>• Phone numbers</li> <li>• year, month, date and place of birth</li> <li>• photographs</li> <li>• Name and surname</li> <li>• name</li> <li>• Certificate of citizenship</li> <li>• details of the identity document</li> <li>• address of the actual place of residence and registration at the place of residence and/or at the place of stay</li> <li>• information about education, profession, specialty and qualifications, details of educational documents</li> <li>• information on previously held positions and length of service, military duty, military registration</li> <li>• Links to social media profiles</li> </ul>
Legal Basis	<ul style="list-style-type: none"> <li>• Federal Law "On Information, Information Technologies and Information Protection" dated 27.07.2006 No. 149-FZ</li> </ul>
Types of personal data processing	<ul style="list-style-type: none"> <li>• Collection, recording, systematization, accumulation, storage, destruction and depersonalization of personal data</li> <li>• Sending Newsletters to Email Address</li> </ul>

## 7. Terms of personal data processing

7.1. The processing of personal data is carried out with the consent of the personal data subject to the processing of his personal data.

7.2. The processing of personal data is necessary to achieve the goals provided for by an international treaty of the Russian Federation or the law, to perform the functions, powers and obligations assigned to the operator by the legislation of the Russian Federation.

7.3. Processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another body or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings.

7.4. Processing of personal data is necessary for the performance of an agreement to which the personal data subject is a party, beneficiary or guarantor, as well as for the conclusion of an agreement at the initiative of the personal data subject or an agreement under which the personal data subject will be a beneficiary or guarantor.

7.5. The processing of personal data is necessary to exercise the rights and legitimate interests of the operator or third parties or to achieve socially significant goals, provided that the rights and freedoms of the personal data subject are not violated.

7.6. Personal data is processed, access to which is provided to an unlimited number of persons by the personal data subject or at his request (hereinafter referred to as publicly available personal data).

7.7. Personal data subject to publication or mandatory disclosure in accordance with the federal law is processed.

8. Procedure for collecting, storing, transferring and other types of processing of personal data

The security of personal data processed by the Operator is ensured by the implementation of legal, organizational and technical measures necessary to fully comply with the requirements of the current legislation in the field of personal data protection.

8.1. The Operator ensures the safety of personal data and takes all possible measures to exclude access to personal data by unauthorized persons.

8.2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of current legislation or if the personal data subject has consented to the Operator to transfer data to a third party to fulfill obligations under a civil law contract.

8.3. In case of inaccuracies in personal data, the User can update them independently by sending a notification to the Operator's e-mail address [vostochnik.solution@gmail.com](mailto:vostochnik.solution@gmail.com) marked "Updating of personal data".

8.4. The period of personal data processing is determined by the achievement of the purposes for which the personal data was collected, unless another period is provided for by the contract or applicable law. The User may withdraw his consent to the processing of personal data at any time by sending a notification to the Operator by e-mail to the Operator's email address [vostochnik.solution@gmail.com](mailto:vostochnik.solution@gmail.com) marked "Withdrawal of consent to the processing of personal data".

8.5. All information collected by third-party services, including payment systems, communication tools 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 with the specified documents. The Operator shall not be liable for the actions of third parties, including the service providers specified in this clause.

8.6. The prohibitions established by the personal data subject on the transfer (except for granting access), as well as on the processing or conditions of processing (except for obtaining access) of personal data permitted for distribution, do not apply in cases of processing of personal data in the state, public and other public interests determined by the legislation of the Russian Federation.

8.7. The Operator ensures the confidentiality of personal data when processing personal data.

8.8. The Operator shall store personal data in a form that makes it possible to identify the personal data subject for no longer than required by the purposes of personal data processing,

unless the personal data storage period is established by a federal law, an agreement to which the personal data subject is a party, beneficiary or guarantor.

8.9. The condition for the termination of personal data processing may be the achievement of the purposes of personal data processing, the expiration of the consent of the personal data subject, the withdrawal of consent by the personal data subject or the request to terminate the processing of personal data, as well as the detection of illegal processing of personal data.

#### 9. List of actions performed by the Operator with the personal data received

9.1. The Operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes and destroys personal data.

9.2. The Operator carries out automated processing of personal data with or without the receipt and/or transfer of the information received via information and telecommunication networks.

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

10.1. Prior to the commencement of activities for the cross-border transfer of personal data, the Operator shall notify the authorized body for the protection of the rights of personal data subjects of its intention to carry out the cross-border transfer of personal data (such notification shall be sent separately from the notification of the intention to process personal data).

10.2. Prior to submitting the above notification, the Operator shall be obliged to obtain relevant information from the authorities of a foreign state, foreign individuals, foreign legal entities to which the cross-border transfer of personal data is planned.

#### 11. Confidentiality of personal data

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

#### 12. Final Provisions

12.1. The User can receive any clarifications on issues of interest regarding the processing of his personal data by contacting the Operator using e-mail [vostochnik.solution@gmail.com](mailto:vostochnik.solution@gmail.com).

12.2. This document will reflect any changes in the policy of processing personal data by the Operator. The policy is valid indefinitely until replaced by a new version.

12.3. The current version of the Policy is freely available on the Internet at <https://vostochnik.com/>.