

Personal Data Processing Policy

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This **Personal Data Processing Policy** (hereinafter referred to as the Policy) has been developed in accordance with the Federal Law dated July 27, 2006 № 152-FL «On Personal Data» (hereinafter referred to as the Law «On Personal Data») and is intended to determine the procedure for processing personal data and measures to ensure the security of personal data of Limited Liability Company «Elibrium» (Primary State Registration Number 1257800067260, Taxpayer Identification Number 7838132248).

The Policy also takes into account, where possible, the provisions of other legislation applicable to the operator's activities in the field of personal data processing, such as the European General Data Protection Regulation (hereinafter referred to as GDPR).

If you have any questions related to the Policy, including questions regarding the processing and protection of your personal data by us, you can send us an inquiry via email at ElibriumCEO@yandex.ru.

1. Basic concepts

1.1. **Personal Data** – any information relating directly or indirectly to a specific or identifiable data subject.

1.2. **Website** – a collection of graphical and informational materials, as well as computer programs and databases, ensuring their availability on the website on the internet at <https://elibrium.ru/> and all subdomains created based on it.

1.3. **Processing of Personal Data** – any action (operation) or set of actions (operations) performed with personal data using automated means or without such means, including:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- clarification (updating, modification);
- extraction;
- use;
- transfer (dissemination, provision, access);
- anonymization;
- blocking;
- deletion;
- destruction of personal data.

1.4. **Automated Processing of Personal Data** – processing of personal data using computing equipment.

1.5. **Dissemination of Personal Data** – actions aimed at disclosing personal data to an indefinite circle of persons.

1.6. **Provision of Personal Data** – actions aimed at disclosing personal data to a specific person or a specific group of persons.

1.7. **Blocking of Personal Data** – temporary cessation of personal data processing (except when processing is required to clarify personal data).

1.8. **Destruction of Personal Data** – actions that make it impossible to restore the content of personal data in the personal data information system and/or result in the destruction of material carriers of personal data.

1.9. **Anonymization of Personal Data** – actions that make it impossible to determine, without additional information, the affiliation of personal data to a specific data subject.

1.10. **Personal Data Information System** – a set of personal data contained in databases and ensuring their processing through information technologies and technical means.

1.11. **Cross-Border Transfer of Personal Data** – transfer of personal data to a foreign state's territory to a government authority of a foreign state, foreign individual, or foreign legal entity.

1.12. **Personal Data Operator** – an individual entrepreneur who, independently or jointly with others, organizes and (or) performs personal data processing, and also determines the purposes of personal data processing, the composition of personal data to be processed, and the actions (operations) performed with personal data.

1.13. **Data Subject** – a natural person to whom the corresponding personal data relates.

1.14. **User** – a natural person to whom the corresponding personal data relates, viewing the content of the website and/or using the functionality of the website.

1.15. **Buyer** – any legally capable individual who has accepted the offer.

2. General provisions

2.1. The Policy is intended to inform the data subject about the Operator's actions regarding the collection, processing, and protection of personal data in order to achieve the stated goals of personal data processing on the website <https://elibrium.ru/>. The data subject submits their data on the pages of the website: <https://elibrium.ru/>. By pressing the "submit" button, the data subject

confirms that they have read and agreed to the text of the consent to the processing of personal data and the Policy.

2.2. The cases of personal data processing to which this Policy applies are listed in the section "Purpose of processing and the composition of information about data subjects, which the Operator receives and processes."

2.3. The submission of personal information by the data subject means their unconditional consent to the Privacy Policy and the conditions for processing their personal data outlined therein. If the data subject disagrees with the terms of the Policy, they should refrain from submitting personal information to the Operator.

2.4. The Policy (including any part of it) may be amended by the Operator without any special notice and without any compensation in this regard. The new version of the Policy takes effect from the moment it is posted on the Operator's website.

2.5. By accepting the terms of the Policy, the data subject expresses their consent to the processing of their data by the Operator for the purposes outlined in the Policy.

2.6. The use of the Website and its services through a web browser that accepts cookies means that the data subject agrees that the Operator may collect and process data from cookies to improve the Website, its content, and its functionality. Disabling and/or blocking the data subject's web browser option for receiving cookies means that the data subject's use of the Website may be restricted, particularly in some of its functions.

2.7. The Operator does not verify the accuracy of the personal information provided by the data subject.

3. The purpose of processing and the composition of information about personal data subjects that the Operator receives and processes

Goal 1.

Categories of data subjects whose personal data is processed: website users, buyers.
Category of personal data: last name, first name, phone number, email address.

Purpose: submission and sending of an application on the website for payment of services and further provision of services, or obtaining feedback.

Methods of processing: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, anonymization, transfer (access, provision), blocking, deletion, destruction of personal data.

Processing and storage period: 10 years from the moment of receipt or from the data subject's request to cease processing/withdraw consent, or from the termination of the Operator's activities. Procedure for destruction of personal data after the expiration of their processing period or upon other lawful grounds: The Operator will delete the personal data from the database.

Goal 2.

Categories of data subjects whose personal data is processed: website users, buyers. Category of personal data: last name, first name, phone number, email address. Purpose: conclusion and execution of a civil contract with the data subject for the transfer of informational materials.

Methods of processing: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, anonymization, transfer (access, provision), blocking, deletion, destruction of personal data.

Processing and storage period: 10 years from the moment of receipt or from the data subject's request to cease processing/withdraw consent, or from the termination of the Operator's activities. Procedure for destruction of personal data after the expiration of their processing period or upon other lawful grounds: The Operator will delete the personal data from the database.

Goal 3.

Categories of data subjects whose personal data is processed: data subjects — website users, buyers.

Category of personal data: last name, first name, phone number, email address.

Purpose: sending the data subject messages, notifications, inquiries, responses, documents, advertising or informational messages.

The data subject may refuse to receive such information at any time by sending the Operator an email at ElibriumCEO@yandex.ru with the subject "Refusal of informational and advertising mailing."

Methods of processing: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, anonymization, transfer (access, provision), blocking, deletion, destruction of personal data.

Processing and storage period: 10 years from the moment of receipt or from the data subject's request to cease processing/withdraw consent, or from the termination of the Operator's activities. Procedure for destruction of personal data after the expiration of their processing period or upon other lawful grounds: The Operator will delete the personal data from the database.

Goal 4.

Categories of data subjects whose personal data is processed: data subjects — website users, buyers.

Category of personal data: last name, first name, phone number, email address, photo/video recording.

Purpose: promotion of services on the market through the collection of reviews, comments, and other methods.

Methods of processing: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, anonymization, transfer (access, provision), blocking, deletion, destruction of personal data.

Processing and storage period: 10 years from the moment of receipt or from the data subject's request to cease processing/withdraw consent, or from the termination of the Operator's activities. Procedure for destruction of personal data after the expiration of their processing period or upon other lawful grounds: The Operator will delete the personal data from the database.

Goal 5.

Categories of data subjects whose personal data is processed: data subjects — website users, buyers.

Category of personal data: IP address, cookies.

Purpose: website administration, data analysis, testing, system maintenance, support, reporting, statistics collection, and data placement.

Methods of processing: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, anonymization, transfer (access, provision), blocking, deletion, destruction of personal data.

Processing and storage period: 10 years from the moment of receipt or from the data subject's request to cease processing/withdraw consent, or from the termination of the Operator's activities. Procedure for destruction of personal data after the expiration of their processing period or upon other lawful grounds: The Operator will delete the personal data from the database.

3.2. If it is necessary to use personal information about users (buyers) for purposes not provided by the Policy, the Operator will request the user's (buyer's) consent for such actions.

4. Legal grounds for personal data processing

4.1. The Policy is developed in accordance with paragraph 2 of part 1 of Article 18.1 of the Federal Law "On Personal Data."

4.2. The Policy contains information subject to disclosure in accordance with part 1 of Article 14 of the Federal Law "On Personal Data" and is a publicly accessible document.

4.3. Legal grounds for processing personal data:

— Processing of personal data is carried out with the consent of the data subject for the processing of their personal data;

— Processing of personal data is necessary for the execution of a contract, where the data subject is a party, beneficiary, or guarantor, and for entering into a contract at the initiative of the data subject or a contract under which the data subject will be a beneficiary or guarantor.

4.4. The Operator processes personal information, including personal data, only if:

4.4.1. The processing is necessary to achieve its goals and fulfill contractual obligations of the Operator towards the data subjects.

4.4.2. The processing is necessary for compliance with the obligations established by law.

4.4.3. When provided by applicable law, processing is necessary to protect the legitimate interests of the Operator, provided that such processing does not significantly affect the interests, fundamental rights, and freedoms of the data subject. When processing personal information on this basis, the Operator will always strive to maintain a balance between its legitimate interests and the protection of the data subject's privacy.

5. Rights of personal data subjects

5.1. In accordance with the Federal Law "On Personal Data," the data subject has the following rights when their personal data is processed:

- The right to access personal data;
- The right to correct personal data;
- The right to block and delete personal data;
- The right to appeal our actions or inactions;
- The right to appeal decisions made solely based on automated processing of their personal data;
- The right to withdraw consent.

6. Request for additional information to identify the personal data subject

6.1. In the course of exercising the rights of the data subject, the Operator may request additional information that will allow the Operator to reliably identify the data subject.

6.2. The Operator will not be able to exercise the rights of the data subject if, in response to a request, the data subject does not provide additional information for their identification.

Conditions for providing information about the rights of the data subject:

6.3. Information related to the exercise of the rights of the data subject is provided free of charge. If the request is clearly unreasonable or excessive, particularly due to its repetitive nature, the Operator may refuse to respond or charge a fee for providing the requested information.

Right of Access to Personal Data:

6.4. The data subject has the right to obtain accurate information from the Operator about the processing of their personal data, and, if possible, access to their personal data and the following information:

6.4.1. Confirmation of the fact of processing personal data by the Operator;

6.4.2. Legal grounds and purposes for processing personal data;

6.4.3. Purposes and methods applied by the Operator for processing personal data;

6.4.4. The name and location of the Operator, information about individuals (except for employees of the Operator) who have access to personal data or to whom personal data may be disclosed based on a contract with the Operator or a federal law;

6.4.5. Personal data processed in relation to the data subject, the source from which they were obtained;

6.4.6. Processing periods for personal data, including retention periods;

6.4.7. The procedure for exercising your rights under Federal Law 152-FL;

6.4.8. Information on cross-border data transfers made or intended.

Right to Correct Personal Data:

6.5. The data subject has the right to demand that the Operator block and delete their personal data processed by the Operator.

6.6. If the Operator cannot delete personal data, the Operator has the right to block it for up to 6 months and find a solution for its deletion during that period. The Operator also has the right to anonymize personal data instead of deletion, so that it is impossible to determine its ownership.

6.7. After blocking, deleting, or anonymizing the personal data, the Operator shall notify the data subject about this.

Right to Block and Delete Personal Data:

6.8. The data subject has the right to demand that the Operator block and delete their personal data processed by the Operator.

6.9. If the Operator cannot delete personal data, they have the right to block it for up to 6 months and find a solution for its deletion during that time. The Operator also has the right to anonymize personal data instead of deletion, so that it is impossible to determine its ownership.

6.10. After blocking, deleting, or anonymizing the personal data, the Operator will notify the data subject about this.

Right to Appeal the Operator's Actions or Inactions:

6.11. The data subject has the right to object to the processing of their personal data in response to the actions or inactions of the Operator. To do so, the data subject may contact the territorial office of Roskomnadzor in their region.

Right to Withdraw Consent:

6.12. If the data subject's data is processed based on consent, they have the right to withdraw it.

Procedure for Withdrawing Consent for Personal Data Processing, Updating and Correcting Personal Data, Responding to Requests for Access to Personal Data:

6.13. The data subject has the right to withdraw their consent and permission for the processing of their personal data at any time, as well as to unsubscribe from informational and mailing services, by sending a message to ElibriumCEO@yandex.ru.

6.14. The data subject has the right to require the deletion, correction, updating of personal data, restrict the processing of personal data, or object to the processing of personal data, when provided by applicable law. The Operator responds to such requests in accordance with the applicable legislation.

6.15. If it is confirmed that personal data is inaccurate or its processing is unlawful, the personal data must be updated by the Operator, and the processing must be stopped.

6.16. The Operator must provide the data subject or their representative with information about the processing of their personal data upon request.

6.17. Once the purposes of personal data processing have been achieved or in case the user withdraws consent for their processing, personal data must be destroyed unless otherwise provided by a contract, where the data subject is a party, beneficiary, or guarantor, or the Operator cannot process the data without the data subject's consent under Federal Law "On Personal Data" or other federal laws, or unless otherwise stipulated by an agreement between the Operator and the data subject.

7. Cases when the Operator cannot exercise the rights of the Personal Data Subject

7.1. The Operator may limit the scope of obligations and rights of the data subject (to access the data, their correction, blocking, or deletion) in the following cases:

7.1.1. Processing of personal data, including personal data obtained as a result of operational-search, counterintelligence, and intelligence activities, is carried out for the purposes of national defense, state security, and law enforcement;

7.1.2. Processing of personal data is carried out by authorities who have detained the data subject on suspicion of committing a crime, or who have brought charges against the data subject in a criminal case, or have applied a preventive measure to the data subject before the charges are presented, except for cases provided by the criminal procedure law of the Russian Federation, if the accused or suspected person is allowed to familiarize themselves with such personal data;

7.1.3. Processing of personal data is carried out in accordance with legislation aimed at combating the legalization (laundering) of proceeds from crime and the financing of terrorism;

7.1.4. Access by the data subject to their personal data violates the rights and legitimate interests of third parties;

7.1.5. Processing of personal data is carried out in cases provided by the transportation security legislation of the Russian Federation, to ensure the stable and secure functioning of the transport system and to protect the interests of individuals, society, and the state in the transport sector from acts of unlawful interference;

7.1.6. When the Operator has legal grounds to continue processing the personal data of the data subject.

8. Data security

8.1. The personal data that the Operator collects and stores is considered confidential information. It is protected from loss, alteration, or unauthorized access in accordance with the legislation of the Russian Federation on personal data. To ensure this, the Operator applies technical means and organizational measures. We continuously improve our data protection systems.

8.2. The Operator has implemented sufficient technical and organizational measures to protect personal data from unauthorized, accidental, or unlawful destruction, loss, alteration, improper use, disclosure, or access, as well as other illegal forms of processing. These security measures were implemented considering the current level of technology, the cost of their implementation, the risks associated with processing, and the nature of the personal data, including the following measures:

8.2.1. Antivirus protection with regularly updated databases;

8.2.2. Restriction of access to personal data to a limited circle of individuals.

8.3. The Operator will store personal data for as long as necessary to achieve the purpose for which it was collected, or to comply with the requirements of legislation and regulatory acts.

9. Regulations for responding to requests/requests from personal data subjects and their representatives, authorized bodies

9.1. The data subject may submit a request in electronic form by email. In this case, the request must be signed with the electronic signature of the data subject in accordance with the legislation of the Russian Federation. The Operator does not process requests related to the transfer or disclosure of personal data received by phone, due to the inability to identify the data subject's identity.

9.2. The response time to the data subject's request does not exceed 20 (twenty) working days from the moment the request is received. The information provided to the data subject in an accessible form does not contain personal data related to other data subjects.

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