

**Approved**  
**by the Director of LLC "Vinteo"**  
**«\_\_» \_\_\_\_\_ 2023 г.**

## **PRIVACY POLICY**

**Krasnodar**  
**2023**

## **1. Introduction**

1.1. Privacy Policy of Personal Information (hereinafter referred to as the Policy) applies to all information that LLC "Vinteo" (hereinafter referred to as the Company) may obtain about the User (hereinafter referred to as the User, the subject of personal data) during the use of any of the Company's websites, services, programs, products, or services (hereinafter referred to as the Services, Company Services) and in the course of the Company's performance of any agreements and contracts with the User.

1.2. This Policy has been developed in accordance with the current legislation of the Russian Federation on personal data.

1.3. This Policy applies to all processes of collecting, recording, systematizing, accumulating, storing, specifying, extracting, using, transmitting (distributing, providing, accessing), depersonalizing, blocking, deleting, destroying personal data carried out using automation tools and without using such tools.

## **2. Composition of personal data**

2.1. Personal data includes any information related directly or indirectly to an identified or identifiable individual (subject of personal data), including, but not limited to, full name, email address, phone number.

2.2. Account information includes information automatically transmitted to the Company's Services during their use through software installed on the User's device, including IP address, cookie data, information about the User's browser (or other program used to access the Services), technical characteristics of the equipment and software used by the User, date and time of access to the Services, addresses of requested pages, and other similar information.

2.3. All personal and account data processed by the Company is confidential, strictly protected information in accordance with the legislation of the Russian Federation.

2.4. This Policy applies only to information processed during the use of the Company's Services. The Company does not control and is not responsible for the processing of information by third-party sites that the User may visit through links available on the Company's sites, including in search results.

2.5. The Company does not verify the accuracy of the personal information provided by the User and does not have the ability to assess their legal capacity. However, the Company assumes that the user provides accurate and sufficient personal information and maintains this information up to date. The User assumes the risks of providing inaccurate or insufficient information.

## **3. Purposes of Processing Personal Data**

3.1. The Company processes personal data for the purpose of formalizing labor and other contractual relations, personnel, accounting, and tax accounting, based on the grounds provided for by Article 22 of Federal Law No. 152-FZ of June 27, 2006, Articles 85-90 of the Labor Code of the Russian Federation, as well as for the purpose of organizing and conducting loyalty programs, marketing and/or advertising campaigns, research, surveys, and other activities; fulfilling the Company's obligations under concluded contracts; providing other services to data subjects; promoting the Company's services, computer programs, and/or goods and/or partners of the Company on the market by establishing direct contact with Company clients using various means of communication, including, but not limited to, telephone,

email, postal mail, the Internet, etc.; for other purposes if the actions of the Company do not contradict the current legislation, to provide Users with the opportunity for feedback with the Company; communication with data subjects: sending notifications, emails, information, and other messages; informing data subjects about services and promotions by phone; monitoring the Company's website: checking information on website usage and other technological services, optimizing their functional characteristics; providing technical support to data subjects for products and services and improving the quality of the Company's products and services; ensuring the most effective display of content on the Company's websites for data subjects, as well as measuring and studying the effectiveness of advertising displayed by the Company for website users; ensuring the security of the Company's website, protecting data subjects' data.

#### **4. Data Subjects:**

- Employees of the Company, former employees of the Company, relatives of the Company's employees;
- Individuals with whom civil law contracts are concluded;
- Candidates for vacant positions at the Company;
- Clients and contractors of the Company (individuals, individual entrepreneurs);
- Representatives/employees of clients and contractors (legal entities, individual entrepreneurs);
- Registered users of the Company's website.

#### **5. Principles and Conditions of Personal Data Processing**

5.1. By the security of personal data (PD), the Company means the protection of PD from unauthorized or accidental access to them, destruction, alteration, blocking, copying, provision, distribution, as well as from other illegal actions regarding PD and takes the necessary legal, organizational, and technical measures to protect PD.

5.2. Processing and ensuring the security of personal data in the Company are carried out in accordance with the requirements of the Constitution of the Russian Federation, Federal Law No. 152-FZ "On Personal Data," subordinate acts, other determining cases and features of personal data processing of the federal laws of the Russian Federation, guiding and methodological documents of the Federal Security Service of Russia and the Federal Security Service of Russia.

5.3. When processing personal data, the Company adheres to the following principles:

- Legality and fairness;
- Limitation of personal data processing to achieving specific, predetermined, and legal purposes;
- Avoidance of personal data processing that is incompatible with the purposes of collecting personal data;
- Avoidance of combining databases containing personal data, the processing of which is carried out for incompatible purposes;
- Processing of personal data that corresponds to the purposes of their processing;

5.4. The Company processes personal data only if at least one of the following conditions is met:

- Processing of personal data is carried out with the consent of the data subject to the processing of his personal data;
- Processing of personal data is necessary for the purposes provided for by law, for the implementation and fulfillment of the functions, powers, and duties assigned to the operator by the legislation of the Russian Federation;
- Processing of personal data is necessary to protect the rights and legitimate interests of the Company or third parties or to achieve socially significant goals, provided that the rights and freedoms of the data subject are not violated;
- Processing of personal data, to which an unlimited number of persons has access, is carried out at the request of the data subject or with his consent;
- Processing of personal data, which is subject to publication or mandatory disclosure in accordance with federal law.

5.5. The Company has the right to entrust the processing of personal data of citizens to third parties based on contracts concluded with these persons.

5.6. Persons processing personal data on behalf of the Company undertake to comply with the principles and rules for the processing and protection of personal data provided for by Federal Law No. 152-FZ "On Personal Data." For each person, a list of actions (operations) with personal data that will be performed by a legal entity processing personal data is determined, the purposes of processing are established, the obligation of such person to maintain confidentiality and ensure the security of personal data during their processing is established, and requirements for the protection of processed personal data are specified.

5.7. For informational support purposes, publicly available sources of personal data of employees may be created in the Company, including directories and address books. With the consent of the employee, his surname, name, patronymic, date and place of birth, position, contact phone numbers, email address may be included in publicly available sources of personal data. Information about an employee must be excluded from publicly available sources of personal data at any time at the request of the employee or by the decision of a court or other authorized state bodies.

5.8. The Company destroys or depersonalizes personal data upon achieving the purposes of processing or in case the necessity to achieve the purpose of processing is lost.

## **6. Rights of the Data Subject**

6.1. A citizen whose personal data is processed by the Company has the right to receive from the Company:

- Confirmation of the fact of processing of personal data by the Company;
- Legal grounds and purposes of processing personal data;
- Information on the methods of processing personal data applied by the Company;
- Name and location of the Company;
- Information about persons who have access to personal data or to whom personal data may be disclosed on the basis of a contract with the Company or on the basis of federal law;
- List of processed personal data related to the citizen from whom the request was received and the source of their receipt, if another procedure for providing such data is not provided by federal law;

- Information about the terms of processing personal data, including the terms of their storage;
- Information on the procedure for exercising the rights of the citizen provided for by Federal Law No. 152-FZ "On Personal Data";
- Information about the ongoing or planned cross-border transfer of personal data;
- Name and address of the entity processing personal data on behalf of the Company;
- Other information provided for by Federal Law No. 152-FZ "On Personal Data" or other federal laws;
- Demand clarification of their personal data, their blocking or destruction if personal data is incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the stated purpose of processing;
- Withdraw their consent to the processing of personal data;
- Require the elimination of illegal actions of the Company regarding their personal data;
- Appeal the actions or inaction of the Company to the Federal Service for Supervision of Communications, Information Technology, and Mass Media (Roskomnadzor) or in court if the citizen believes that the Company processes their personal data in violation of the requirements of Federal Law No. 152-FZ "On Personal Data" or otherwise violates their rights and freedoms;
- Protect their rights and legitimate interests, including compensation for damages and/or compensation for moral harm in court.

## **7. Company's Obligations**

7.1. In accordance with the requirements of Federal Law No. 152-FZ "On Personal Data," the Company is obliged to:

- Provide the data subject, upon request, with information regarding the processing of their personal data, or lawfully refuse to provide such information;
- At the request of the data subject, clarify the personal data being processed, block or delete them if the personal data is incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the stated purpose of processing;
- Keep a register of requests from data subjects for obtaining personal data, in which requests from data subjects for obtaining personal data and facts of providing personal data in response to these requests must be recorded;
- Notify the data subject of the processing of personal data if personal data were not obtained from the data subject.

Exceptions include the following cases:

- The data subject has been notified of the processing of their personal data by the relevant operator;
- Personal data has been obtained by the Company based on federal law or in connection with the performance of a contract, of which the data subject is a party, beneficiary, or guarantor;
- Personal data has been made publicly available by the data subject or obtained from a publicly available source;

- The Company processes personal data for statistical or other research purposes, for the exercise of the professional activities of a journalist, or for scientific, literary, or other creative activities, provided that the rights and legitimate interests of the data subject are not violated;
- Providing the data subject with information contained in the Personal Data Processing Notice violates the rights and legitimate interests of third parties;
- In case of achieving the purpose of processing personal data, immediately cease the processing of personal data and destroy the corresponding personal data within a period not exceeding thirty days from the date of achieving the purpose of processing personal data, unless otherwise provided by the contract, of which the data subject, beneficiary, or guarantor is a party, or by another agreement between the Company and the data subject, or if the Company is not entitled to process personal data without the consent of the data subject on the grounds provided by No. 152-FZ "On Personal Data" or other federal laws;
- In case of the data subject's withdrawal of consent to the processing of their personal data, cease the processing of personal data and destroy the personal data within a period not exceeding thirty days from the date of receipt of the withdrawal, unless otherwise provided by an agreement between the Company and the data subject. The Company must notify the data subject of the destruction of personal data;
- In case of receiving a request from the data subject to cease the processing of personal data for the purpose of promoting goods, works, services on the market, immediately cease the processing of personal data.

## **8. Measures to ensure the security of personal data during their processing**

The company takes necessary and sufficient organizational and technical measures to protect the user's personal information from unauthorized or accidental access, destruction, alteration, blocking, copying, distribution, as well as other unlawful actions by third parties.

## **9. Responsibility**

In case of non-compliance with the provisions of this Policy, the Company bears responsibility in accordance with the current legislation of the Russian Federation.

## **10. Final provisions**

10.1. You can obtain clarification on issues related to the processing of your personal data by contacting the Company in person or by sending an official request via Russian Post to the following address: 350058, Krasnodar, St. Starokubanskaya, building 114, office 309. In the event of sending an official request to the Company, the following information must be provided in the text of the request:

- Full name;
- Information confirming your relationship with the Company or information in any other way confirming the fact of processing of personal data by the Company;
- Signature of the individual (or their legal representative). If the request is sent electronically, it must be in the form of an electronic document and signed with an electronic signature in accordance with Russian legislation.

10.2. The Policy is effective indefinitely after its approval and until replaced by a new version. The current version of the Policy is posted on the Company's website.