

Personal Data Processing Policy

1. General Provisions

This policy of personal data processing is drawn up in accordance with the requirements of the Federal Law dated 27.07.2006 № 152-FZ "On Personal Data" (hereinafter referred to as the Law on Personal Data) and determines the order of personal data processing and measures to ensure the security of personal data undertaken by AR SOFT LLC (hereinafter referred to as the Operator).

1.1 The Operator sets as its most important goal and condition of its activity the observance of human and civil rights and freedoms during the processing of personal data, including the protection of the rights to privacy, personal and family secrecy.

1.2 This Operator's policy on personal data processing (hereinafter referred to as the Policy) applies to all information that the Operator may obtain about users of software owned by AR SOFT LLC

2. Basic Concepts used in the Policy

2.1 Automated processing of personal data - processing of personal data by means of computer equipment.

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

2.3 Software (Software) - computer program(s) owned by AR SOFT LLC, including its (their) components, which is (are) a set of data and commands represented in objective form, including source code, code, database, audiovisual works included by the Contractor in the program(s), as well as any documentation on its (their) use.

2.4 Personal data information system - a set of personal data contained in databases and information technologies and technical means ensuring their processing.

2.5. Personal data depersonalization - actions, as a result of which it is impossible to determine without the use of additional information the belonging of personal data to a particular User or other subject of personal data.

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

2.7. Operator - a state authority, municipal authority, legal entity or individual, independently or jointly with other persons organizing and (or) carrying out processing of personal data, as well as determining the purposes of personal data processing, composition of personal data subject to processing, actions (operations) performed with personal data.

2.8 Personal Data - any information relating directly or indirectly to a certain or defined User of the Software.

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

2.10. User - any person who performs any operations using the Software and has obtained access to the Software, as well as any person who does not perform operations using the Software, but has

obtained access to the Software and has passed the registration procedure by filling in a special form and transferring information from this form to AR SOFT LLC.

2.11. Provision of personal data - actions aimed at disclosure of personal data to a certain person or a certain circle of persons.

2.12. Dissemination of personal data - any actions aimed at disclosure of personal data to an indefinite number of persons (transfer of personal data) or familiarization of personal data to an unlimited number of persons, including disclosure of personal data in mass media, placement in information and telecommunication networks or providing access to personal data in any other way.

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

2.14. Destruction of personal data - any actions, as a result of which personal data are irretrievably destroyed with the impossibility of further recovery of the content of personal data in the personal data information system and (or) material carriers of personal data are destroyed.

3. Basic Rights and Obligations of the Operator

3.1 The Operator has the Right to:

- receive from the subject of personal data reliable information and/or documents containing personal data;
- in case the personal data subject revokes his/her consent to 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 Personal Data Law;
- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Personal Data Law and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws.

3.2 Its necessary for the Operator:

- provide the personal data subject, upon his/her request, with information regarding the processing of his/her personal data;
- organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;
- respond to appeals and requests of personal data subjects and their legal representatives in accordance with the requirements of the Law on personal data;
- to inform the authorized body for the protection of the rights of personal data subjects at the request of this body the necessary information within 30 days from the date of receipt of such request;
- to publish by posting on the official website or otherwise provide unrestricted access to this Policy on personal data processing;
- to take legal, organizational and technical measures to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unlawful actions with regard to personal data;
- cease transfer (dissemination, provision, access) of personal data, stop processing and destroy personal data in the manner and cases stipulated by the Personal Data Law;
- fulfill other obligations stipulated by the Personal Data Law.

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 for cases provided for by federal laws. Information shall be provided to the subject of personal data by the Operator in an accessible form and shall not contain personal data relating to other subjects of personal data, except in cases where there are legal grounds for disclosure of such personal data. The list of information and the procedure for obtaining it is established by the Law on Personal Data;
- demand from the operator to clarify his personal data, block or destroy it in case the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as to take measures provided by law to protect his rights;
- to impose the condition of prior consent when processing personal data in order to market goods, works and services;
- to revoke the consent to 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 unlawful acts or omissions of the Operator in the processing of his/her 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 themselves;
- promptly notify the Operator about clarification (update, change) of their personal data.

4.3 Persons who have provided the Operator with inaccurate information about themselves or information about another subject of personal data without the consent of the latter shall be held liable in accordance with the legislation of the Russian Federation.

5. The Operator may process the following personal data of the User

5.1 Surname, first name, patronymic.

5.3. Telephone numbers (including e-mail address).

5.3 Telephone numbers.

5.4. Region of location.

5.5 The Operator may also collect and process anonymized data about visitors using services built into the Operator's software or website.

5.6 The above-mentioned data are hereinafter in the text of the Policy united by the general term Personal Data.

5.7 The Operator does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, intimate life.

5.8 The processing of personal data authorized for dissemination from among the special categories of personal data specified in Article 10.1 of the Personal Data Law is allowed if the prohibitions and conditions stipulated in Article 10.1 of the Personal Data Law are complied with.

5.8.1 The User gives his/her consent to the processing of personal data directly to the Operator.

5.8.2 The transfer (distribution, provision, access) of personal data must be stopped at any time at the request of the subject of personal data. This request shall include the surname, first name, patronymic (if any), contact information (telephone number, e-mail address or postal address) of the personal data subject, as well as a list of personal data, the processing of which shall be stopped. The personal data specified in this request may be processed only by the Operator to whom it is sent.

5.8.3 Consent to the processing of personal data shall be terminated from the moment the Operator receives the request specified in clause 5.8.2 of this Personal Data Processing Policy.

6. Principles of Personal Data Processing

6.1 The processing of personal data shall be carried out on a lawful and fair basis.

6.2 The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data incompatible with the purposes of personal data collection is not allowed.

6.3 It is not allowed to merge databases containing personal data processed for incompatible purposes.

6.4 Only personal data that meet the purposes of their processing shall be processed.

6.5 The content and scope of personal data processed by the Operator corresponds to the stated purposes of processing. The redundancy of processed personal data in relation to the stated purposes of their processing is not allowed.

6.6 When processing personal data, the accuracy of personal data, their sufficiency and, where necessary, relevance to the purposes of personal data processing shall be ensured. The Operator shall take the necessary measures and/or ensure that they are taken to delete or clarify incomplete or inaccurate data.

6.7 Storage of personal data is carried out in a form that allows to identify the subject of personal data, no longer than required by the purposes of personal data processing, unless the period of storage of personal data is established by federal law, contract, party to which, beneficiary or guarantor of which is the subject of personal data. Processed personal data shall be destroyed or depersonalized upon achievement of the purposes of processing or in case of loss of necessity to achieve these purposes, unless otherwise provided for by federal law.

7. Purposes of Personal Data Processing

7.1 The Purpose of Processing the User's Personal Data:

- informing the User by sending e-mails;
- conclusion, execution and termination of civil law contracts;
- providing the User with access to services, information and/or materials related to the use of the Software; providing access to the Software.

7.2 The Operator is also entitled to send to the User notifications about new products and services, special offers and various events. The User can always refuse to receive information messages by sending a letter to the Operator's e-mail address marked "Refusal of notifications about new products and services and special offers" or by sending a letter to the Operator's address by post.

7.3 The Anonymized User data collected from the services built into the Software are used to collect information about the User's activities in the Software, to improve the quality of the provided Software and the operation of its individual components.

8. Legal Basis for Processing Personal Data

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

- Federal Law "On Information, Information Technologies and Information Protection" dated 27.07.2006 N 149-FZ;
- Operator's statutory documents;
- contracts and other agreements concluded between the Operator and the subject of personal data;
- federal laws, other regulatory legal acts in the field of personal data protection;

- Users' consent to the processing of their personal data.

8.2 The Operator processes the User's personal data only if it is filled in and/or sent by the User himself/herself through special forms embedded in the Software, placed on the Operator's website or sent to the Operator via e-mail or postal mail. By filling in the relevant forms and/or sending his/her personal data to the Operator, the User expresses his/her consent to this Policy.

8.3 The Operator may process anonymized data about the User if it is allowed in the User's browser settings (cookies and JavaScript technology enabled).

8.4 The subject of personal data independently decides whether to provide his/her personal data and gives consent freely, of his/her own free will and in his/her own interest.

9. Conditions of Personal Data Processing

9.1 The processing of personal data is carried out with the consent of the personal data subject to the processing of his/her personal data.

9.2 The processing of personal data is necessary to achieve the purposes stipulated by the international treaty of the Russian Federation or by law, to fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation.

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

9.4 The processing of personal data is necessary for the purpose of executing a contract to which the personal data subject is a party or a beneficiary or guarantor, as well as for the purpose of concluding a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor.

9.5 The processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator or third parties or for the achievement of socially important purposes, provided that the rights and freedoms of the personal data subject are not violated.

9.6 Processing of personal data to which access is granted by the subject of personal data or at his/her request (hereinafter - publicly available personal data) is carried out.

9.7 Processing of personal data subject to publication or mandatory disclosure in accordance with federal law is carried out.

10. Procedure for Collection, Storage, Transfer and other types of Personal Data Processing

The security of personal data processed by the Operator is ensured through the implementation of legal, organizational and technical measures necessary for full compliance with the requirements of the applicable legislation in the field of personal data protection.

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

10.2 The User's personal data will never, under no circumstances, be transferred to third parties, except in cases related to the execution of the current legislation or if the subject of personal data has given consent to the Operator to transfer the data to a third party for the fulfillment of obligations under a civil law contract.

10.3 In case of identification of inaccuracies in personal data, the User may update them independently by sending a notice to the Operator, including by e-mail to the Operator's e-mail address marked "Personal Data Update".

10.4 The term of personal data processing is determined by the achievement of the purposes for which the personal data were collected, unless another term is stipulated by the contract or applicable law.

The User may withdraw his/her consent to the processing of personal data at any time by sending a notice to the Operator, including by e-mail to the Operator's e-mail address marked "Withdrawal of consent to the processing of personal data".

10.5 All information that is collected by third-party services, including payment systems, means of communication and other service providers, is stored and processed by the specified persons (Operators) in accordance with their User Agreement and Privacy Policy. The subject of personal data and/or User is obliged to familiarize himself/herself with the said documents in a timely manner. The Operator is not responsible for the actions of third parties, including service providers specified in this clause.

10.6 The prohibitions established by the personal data subject on the transfer (except for providing access), as well as on the processing or conditions of processing (except for access) of personal data authorized for dissemination do not apply in cases of processing personal data in the state, public and other public interests defined by the legislation of the Russian Federation.

10.7 When processing personal data, the Operator shall ensure confidentiality of personal data.

10.8. The Operator shall store personal data in a form that allows to identify the subject of personal data for no longer than required by the purposes of personal data processing, unless the period of personal data storage is established by federal law, contract to which the subject of personal data is a party, beneficiary or guarantor.

10.9 The condition for termination of personal data processing may be the achievement of the purposes of personal data processing, expiration of the personal data subject's consent or withdrawal of consent by the personal data subject, as well as detection of unlawful processing of personal data.

11. List of actions performed by the Operator with the received Personal Data

11.1 The Operator shall collect, record, systematize, accumulate, store, clarify (update, change), extract, use, transfer (disseminate, provide, access), depersonalize, block, delete and destroy personal data.

11.2 The Operator carries out automated processing of personal data with or without receiving and/or transmitting the received information via information and telecommunication

12. Cross-Border Transfer of Personal Data

12.1 Before commencing the trans-border transfer of personal data, the Operator is obliged to ensure that the foreign state, to the territory of which the transfer of personal data is supposed to be carried out, provides reliable protection of the rights of personal data subjects.

12.2 Trans-border transfer of personal data to the territory of foreign states, which do not meet the above requirements, may be carried out only in case of written consent of the personal data subject to the trans-border transfer of his/her personal data and/or fulfillment of the agreement to which the personal data subject is a party.

13. 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 disseminate personal data without the consent of the subject of personal data, unless otherwise provided by federal law.



14. Final Provisions

14.1 The User may obtain any clarifications on issues of interest regarding the processing of his/her personal data by applying to the Operator with a written request.

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

14.3. The current version of the Policy is freely available on the Internet at <https://vr-arsoft.com/personal-data-processing-policy>