

Personal Data Processing Policy

This Personal Data Processing Policy (hereinafter, the “Policy”) defines the general principles and procedure for processing of Personal Data and measures to ensure security thereof within Joint Stock Company Information Agency RUTRANS when operating the website on the Internet at www.bizavsafety.aero (hereinafter, the “Site”).

Before using the Site, please read the provisions of this Policy.

1. Terms and Definitions

1.1. The Operator and the Users shall use the following terms with the meanings specified below:

1.1.1. **Automatic Processing of Personal Data** means processing of Personal Data with the use of computer technology;

1.1.2. **Operator’s Database** means a collection of information and data located in the Operator’s information system for the purpose of storing the Users’ Personal Data and other information.

1.1.3. **Blocking of Personal Data** means suspension of processing of Personal Data (except where processing is required for clarification of Personal Data).

1.1.4. **Data** means other data about the User (not included in the notion of Personal Data).

1.1.5. **Legislation** means the applicable legislation of the Russian Federation.

1.1.6. **Personal Data Information System** means a collection of Personal Data contained in databases, as well as information technologies and technical means that ensure processing thereof.

1.1.7. **Personal Data Confidentiality** means the obligation of persons that gained access to Personal Data to refrain from distribution and disclosure to the third parties of Personal Data without the consent of the Personal Data Subject, unless otherwise provided for by the federal legislation.

1.1.8. **Offer Agreement** means an agreement concluded between the Operator and the User, available at www.bizavsafety.aero.

1.1.9. **Processing of Personal Data** means any action (operation) or a set of actions (operations) performed in relation to Personal Data with or without the use of automation facilities, including collection, recording, systematization, accumulation, storage, clarification (updating, change), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of Personal Data.

1.1.10. **Operator** means Joint Stock Company Information Agency RUTRANS that independently or jointly with other persons organizes and/or performs processing of Personal Data, as well as defines the purposes of processing Personal Data, composition of Personal Data to be processed, actions (operations) to be performed with Personal Data.

1.1.11. **Site** means a hardware and software complex consisting of the site accessible online with the domain name www.bizavsafety.aero, computer programs, databases, storage space and equipment.

1.1.12. **Personal Data** means any information that directly or indirectly relates to a certain or identifiable individual (User). The User independently provides Personal Data upon registration on the Site or when using the Site.

1.1.13. **User** means an individual having access to the Site and having entered into contractual relations with the Operator.

1.1.14. **Provision of Personal Data** means actions of the User aimed at disclosing Personal Data to a certain person or a certain scope of persons.

1.1.15. **Personal Data Subject** means the User, to whom Personal Data relate.

1.1.16. **Destruction of Personal Data** means actions resulting in impossibility to restore the content of Personal Data in the Personal Data Information System and/or resulting in destruction of physical Personal Data storage media.

2. General Provisions

2.1. This Policy on processing of Personal Data and Data is developed in accordance with the provisions of Federal Law No. 152-FZ of 27 July 2006 On Personal Data (as amended), other legislative instruments and regulations, and defines security requirements and procedure for handling Personal Data and Users' Data.

2.2. Measures for ensuring security of Personal Data constitute an integral part of the Operator's activities.

2.3. Contractual relations between the Operator and the Users are governed by the Offer Agreement.

3. Personal Data Processing Principles

3.1. Processing of Personal Data and/or Data by the Operator is carried out in accordance with the following principles:

3.1.1. Legality and fair basis of processing of Personal Data and/or Data. The Operator takes all measures necessary to ensure compliance with the requirements of the Legislation, does not process Personal Data in cases where it is not allowed by the Legislation, does not use Personal Data to the detriment of the User.

3.1.2. Processing of only those Personal Data and/or Data that meet the declared purposes of their processing. Fitness of the content and scope of Personal Data being processed for the declared purposes of processing. Non-admittance of processing of Personal Data inconsistent with the purposes of collection of Personal Data, as well as excessive in relation to the declared purposes of processing thereof.

3.1.3. The Operator processes Personal Data solely for the purpose of performance of contractual obligations to the User.

3.1.4. Ensuring accuracy, sufficiency and relevance of Personal Data and/or Data with regard to the purposes of processing of Personal Data and/or Data. The Operator takes all reasonable measures to maintain relevance of Personal Data being processed, including, but not limited to, the exercise of the right of each Subject to receive their Personal Data for review and require the Operator to clarify, block or destroy them, if Personal Data are incomplete, outdated, inaccurate, illegally obtained or are not required for the purposes of processing declared above.

3.1.5. Storage of Personal Data and/or Data in the form that provides the possibility to identify the Subject of Personal Data and/or Data for no longer than is required for the purposes of Personal Data processing, if the period of storage of Personal Data is not established by the federal legislation or by the agreement, to which or under which the Personal Data Subject is a party or a beneficiary.

3.1.6. Inadmissibility of combining databases of Information Systems of Personal Data and/or Data created for incompatible purposes.

4. Composition of information that may be obtained from the User's device when using the Site and purposes of obtaining thereof

- 4.1. Surname, name, patronymic;
- 4.2. e-mail address;
- 4.3. mobile telephone number.

Purposes:

- conclusion of the Offer Agreement between the Operator and the User;
- mailing out of promotional and informational materials;
- ensuring of the possibility of communication between the Operator and the User in the course of performance of contractual obligations on the basis of the Offer Agreement.

4.4. Bank card details (bank card number, name and surname of the bank card holder, CVC/CVV code, bank card validity period).

Purposes:

- Ensuring of the possibility of making settlements between the User and the Operator on the basis of the Offer Agreement.

- 4.5. Place of employment (name of the organization) and position;
- 4.6. User's device identifier;
- 4.7. Time and date of using the Site;
- 4.8. Information on the operating system version and model of the User's device.

Purposes:

- conducting of statistical and other research based on the User's depersonalized personal data;
- analysis of possible errors in the operation of the Site and improvement of its operation.

5. Personal Data Processing Conditions

5.1. Processing of Personal Data by the Operator is allowed in the following cases:

5.1.1. Subject to the consent of the User to processing of his/her Personal Data obtained upon registration of the User on the Site.

5.1.2. Personal Data are subject to publication or mandatory disclosure in accordance with the Legislation.

5.2. Except as provided for in the Legislation and agreements between the Operator and the Users, the Operator shall not disclose to the third parties and shall not distribute Personal Data and/or Data without the consent of the User.

5.3. Personal Data and/or Data may be transferred to partners of the Operator for the purpose of performance of obligations stipulated by the Offer Agreement between the Operator and the Users.

5.4. The Operator does not process Personal Data falling in the special categories and relating to race and ethnic background, political views, religious or philosophical beliefs, health status, intimate life of the Personal Data Subject, membership of the Personal Data Subject in public associations, except as expressly provided for in the Legislation.

5.5. Personal Data are processed in the territory of the Russian Federation.

6. Collection and Processing of Personal Data and Other Data

- 6.1. Processing of Personal Data involves performance by the Operator of the following actions:
- 6.1.1. collection;
 - 6.1.2. recording;
 - 6.1.3. systematization;
 - 6.1.4. accumulation;
 - 6.1.5. storage;
 - 6.1.6. clarification (updating, change);
 - 6.1.7. retrieval;
 - 6.1.8. use;
 - 6.1.9. transmission (distribution, provision, access), including cross-border transmission;
 - 6.1.10. depersonalization;
 - 6.1.11. blocking;
 - 6.1.12. deletion;
 - 6.1.13. destruction;
 - 6.1.14. transfer to the third parties in instances provided for in this Policy.

7. Rights and Obligations of the Operator and the User

- 7.1. The Operator shall use Personal Data in accordance with Federal Law No. 152-FZ of 27 July 2006 On Personal Data and local regulations of the Operator.
- 7.2. Regarding Personal Data and other User Data the Operator shall maintain confidentiality thereof, unless the specified data are publicly available.
- 7.3. The Operator may transfer Personal Data and other User Data without the User's consent to the following persons:
- 7.3.1. government authorities, including inquiry and investigative agencies, and local government administrations at their reasonable request;
 - 7.3.2. partners of the Operator for the purpose of performance of contractual obligations to the User;
 - 7.3.3. in other cases expressly provided for by the applicable legislation of the Russian Federation.
- 7.4. The Operator may transfer Personal Data and other Data to the third parties in the following cases:
- 7.4.1. The User expressed his/her consent to such actions;
 - 7.4.2. transfer is required for the purpose of performance of the Offer Agreement between the Operator and the User;
 - 7.4.3. transfer is performed by way of succession from the Operator to the newly established legal entities with simultaneous transfer to the successor of all obligations to comply with the terms and conditions of this Policy;
 - 7.4.4. The Operator carries out automated processing of Personal Data and other Data.

7.5. Access to Information Systems containing Personal Data is ensured by a password system. Passwords are set by the authorized employees of the Operator and are individually communicated to employees of the Operator having access to Personal Data and/or Data.

7.6. When exercising access the Operator acquires the right to view Personal Data and/or Data without the right to copy (change) them.

8. Change of Personal Data

8.1. The User may at any time change (update, supplement, delete) Personal Data by sending a written application to the Operator to the e-mail address indicated in clause 12 hereof.

9. Confidentiality of Personal Data

9.1. The Operator maintains confidentiality of Personal Data and/or Data processed by it in the manner prescribed by the Legislation.

9.2. Confidentiality is not required for:

9.2.1. Personal Data after depersonalization thereof;

9.2.2. Personal Data that are made publicly available by the User or at his/her request (hereinafter, Personal Data made publicly available by the User);

9.2.3. Personal Data subject to publication or mandatory disclosure in accordance with the Legislation.

10. User's Consent to Personal Data Processing

10.1. The User decides to provide his/her Personal Data to the Operator upon registration, as well as in the process of using the Site and gives his/her consent to processing thereof of his/her own free will and volition, and on his/her own behalf.

11. Other Provisions

11.1. This Policy and relations between the User and the Operator arising in connection with application of the Policy are governed by the law of the Russian Federation.

11.2. All possible disputes are subject to resolution in accordance with the Legislation.

11.3. Prior to taking legal action the User shall comply with the mandatory pre-court dispute resolution procedure and send the respective written complaint to the Operator. The complaint response period is thirty (30) business days.

11.4. If, for any reasons whatsoever, one or more provisions of the Policy are declared invalid or unenforceable, this shall not affect validity or enforceability of the remaining provisions of the Privacy Policy.

11.5. The Operator may at any time amend this Policy (in whole or in part) unilaterally without the prior consent from the User. All amendments become effective on the next day after posting on the Site.

11.6. The User is solely responsible for monitoring changes in the Privacy Policy by reviewing the current version.

12. Contact details of the Operator

E-mail: rutrans.info@gmail.com

Correspondence address: 107150, Moscow, Boytsovaya ulitsa, 22, floor/unit/room/office 2/V/8/zd