# Confidentiality Policy for www.russkiymir.ru domain websites

This personal data Confidentiality Policy (hereinafter referred to as the Policy) applies to all User information that websites hosted on the russkiymir.ru domain (hereinafter referred to as the Websites) may receive during the use of the Websites. The User's consent to the provision of personal data given in accordance with this Policy within the framework of relations with one of the Users applies to all.

By using the Website, the User gives unconditional consent to this Policy and the terms of processing personal data specified therein; in case of disagreement with these terms, the User must refrain from using the services (rendering the services) offered by the Websites.

### 1. Terms and Definitions

- 1.1 This Confidentiality Policy uses the following terms:
- 1.1.1. The Website Administration (hereinafter referred to as the Website Administration) employees authorized to administer websites, acting on behalf of the Russkiy Mir Foundation who organize and/or process personal data and set the goals of processing personal data, the composition of personal data subject to processing, and actions (operations) involving personal data.
- 1.1.2. Personal Data any information directly or indirectly related to a specific or determinable individual (personal data subject).
- 1.1.3. Personal Data Processing any action (operation) or a combination of actions (operations) carried out with or without means of automation and involving personal data, including gathering, recording, systematizing, accumulating, storing, specifying (updating, amending), retrieving, using, transferring (disseminating, providing, accessing), depersonalizing, blocking, deleting, or destroying personal data.
- 1.1.4. Personal Data Confidentiality the requirement mandatory for an operator or another party with access to personal data not disseminate personal data without the consent of the personal data subject or on other legal grounds.
- 1.1.5. Website User (hereinafter referred to as the User) a person accessing the Websites on the Internet.
- 1.1.6. Cookies a piece of data sent by the web server and stored on the User computer which a web client or a web browser every time sends to the web server in the HTTP request in an attempt to open a webpage of the respective website.
- 1.1.7. IP Address a unique network address of a node in a computer network built using the IP protocol.

## 2. User Personal Data received and processed by Websites

- 2.1. This Policy defines User Personal Data as:
- 2.2.1. Personal information provided by a User when filling feedback forms, including User Personal Data. The information mandatory for the provision of services is duly marked. Other information is provided by a User at one's discretion.
- 2.2.2. Information automatically transferred to Website services during their use through software installed on the User device, including IP address, cookies, information about the User browser (or another software used to access services), technical characteristics of hardware and software operated by the User, time and data of accessing, addresses of requested webpages and other similar information.
- 2.2. This Policy is applicable to Websites only. The Websites do not control and do not bear responsibility for Internet resources of third parties, which a User may access by links available on the Websites or as a result of a search. Other Personal Data may be gathered or requested from the User by such Internet resources and other actions may be carried out.
- 2.3. The Websites do not verify the accuracy of personal data provided by Users and do not control their legal capacity. However, the Websites presume that a User provides accurate and sufficient personal data to answer questions in the registration form and keeps this data updated.

## 3. Purpose of gathering and processing User Personal Data

- 3.1. A Website gathers and stores nothing but personal data needed for the provision of services or the fulfillment of agreements and contracts with the User except in cases the law requires mandatory storing of personal data within a period specified by law.
  - 3.2. The Websites may use personal data for the following purposes:
- 3.2.1. Identification of a User registered on the Websites and serving as a party to agreements and contracts with the Russkiy Mir Foundation;
- 3.2.2. Provision of a User with reference information, personalized services, including the issuance of documents and visas, the purpose of travel documents for organizing a User's participation in events of the Russkiy Mir Foundation;
- 3.2.3. Provision of a User with feedback, including notifications, applications and information concerning the use of services, the provision of services, and processing of requests and applications from a User;
  - 3.2.4. Development of services, improvement of their quality, user convenience;
  - 3.2.5. Verification of the accuracy and fullness of data provided by a User.
  - 3.2.6. Statistical and other research based on depersonalized data.

### 4. Terms of processing User Personal Data and its transfer to third parties

4.1. Websites store personal data of Users consistent with the internal regulations of particular services.

- 4.2. Confidentiality of User Personal Data is maintained except when a User volunteers to provide personal information for public access. While using certain services, a User agrees that a particular part of personal data will be available for public access.
  - 4.3. Websites can transfer User Personal Data to third parties in the following cases:
  - 4.3.1. A User expresses consent to such actions;
- 4.3.2. The transfer is necessary for a User's access to a particular service or the provision of a service to a User;
- 4.3.3. The transfer is envisaged by Russian or other applicable law as part of a legal procedure;
- 4.3.4. For the purpose of the provision of rights and lawful interests of Websites and third parties in the event of a User's breach of the User Agreement of Websites' services.
- 4.4. User Personal Data is processed for an unlimited period by any lawful method, including in information systems with or without using means of automation. User Personal Data is processed consistent with Federal Law No. 152-FZ "On Personal Data" dated 27.07.2006.
- 4.5. In case of the loss or leak of personal data, the Website Administration notifies a User about the loss or leak of personal data.
- 4.6. The Website Administration takes relevant organizational and technical efforts to protect User Personal Data from unauthorized or accidental access, destruction, changing, blocking, copying, dissemination and other unlawful actions of third parties.
- 4.7. Together with a User, Website Administration takes all measures necessary to prevent losses or other negative impact from the loss or leak of User Personal Data.

## 5. Obligations of the Parties

- 5.1. A User must:
- 5.1.1. Provide personal data needed for using the Website.
- 5.1.2. Update and augment the provided personal data whenever it changes.
- 5.2. The Website Administration must:
- 5.2.1. Use the information provided exclusively for the purposes defined by this Confidentiality Policy.
- 5.2.2. Provide the secrecy of confidential information, not to disclose the information without a preliminary written consent of the user, and not to sell, exchange, publish or disclose in any other method possible the provided User Personal data except in cases specified by this Confidentiality Policy.
- 5.2.3. Take precautions to protect confidential User Personal Data consistent with the rules in effect for protecting such information in existent business transactions.
- 5.2.4. Block personal data of a respective User the moment the User or the User's lawful representative or an agency authorized to protect the rights of Personal Data subjects files an application or a request for the verification period in case of the detection of inaccurate personal data or unlawful actions.

## 6. Responsibility of the Parties

- 6.1. The Website Administration, which fails to fulfill its obligations, bears responsibility consistent with legislation of the Russian Federation.
- 6.2. In case of a loss or leak of confidential information, the Website Administration bears no responsibility if such confidential information:
  - 6.2.1. Becomes public before its loss or leak.
  - 6.2.2. Is received from a third party before it is received by the Website Administration.
  - 6.2.3. Is disclosed with the User's consent.

## 7. Resolution of Disputes

- 7.1. Before appealing to a court in disputes arising from the relations between a Website User and the Website Administration, a claim must be made (a written proposition of an amicable settlement of the dispute).
- 7.2. The party that receives a claim must notify the applicant in writing within 15 calendar days since the claim is received about results of the claim processing.
- 7.3. Whenever a dispute remains unsettled, it will be brought to a court consistent with current legislation of the Russian Federation.
- 7.4. Current laws of the Russian Federation apply to this Confidentiality Policy and relations between a User and the Website Administration.

#### 8. Additional terms

- 8.1. The Website Administration may amend the Confidentiality Policy without a User's consent.
- 8.2. The new Confidentiality Policy takes effect the moment it is published on the Websites unless a new edition of the Confidentiality Policy provides otherwise.
- 8.3. All proposals or questions regarding this Confidentiality Policy shall be emailed to <a href="mailto:admin@russkiymir.ru">admin@russkiymir.ru</a>.