

1. GENERAL PROVISIONS

- 1.1. This Document determines the policy of IPJSC INGOSSTRAKH (IPJSC INGOSSTRAKH (PSRN 1027739362474, TIN 7705042179, address: 115035, Moscow, Pyatnitskaya st., 12, bldg. 2) (hereinafter referred to as the “Company”) and/or their affiliates as related to the processing of personal data being processed via the website located on the Internet: <https://www.ingodance.ru/>, and sets out a system of basic principles applied to the processing of personal data in the Company. The Personal Data Processing Policy (hereinafter referred to as the “Policy”) applies to all operations performed in the Company with personal data with or without automation tools.

In accordance with subsection 2 of article 3 of Federal Law No. 152-FZ dated 27.07.2006 "On Personal Data", the Company is a personal data operator - a legal entity independently organizing and (or) processing personal data, as well as determining the purposes of processing personal data, list of personal data to be processed and actions (operations) involving personal data. The Company does not process personal data on behalf of another operator.

The Policy applies to relationships in the field of personal data processing that arose for the Operator both before and after the approval of the Policy.

The Operator carries out its activities in relation to personal data provided by users on the website: <https://www.ingodance.ru/> (hereinafter referred to as the “Website”).

The Policy applies to all personal data processed by the Company. The Policy applies to all information that the Company can receive about the user while using the website, services, programs and products (hereinafter referred to as the “Services”).

- 1.2. All persons allowed to process personal data in the Company, as well as persons participating in the organization of processing processes and ensuring the security of personal data in the Company, are required to familiarize themselves with the Policy.
- 1.3. The Policy has been developed pursuant to Federal Law No. 152-FZ dated 27.07.2006 "On Personal Data" (hereinafter referred to as “FZ-152”).
- 1.4. The collection, storage and processing of personal data are carried out by the Company on the basis of FZ-152 and the Labor Code of the Russian Federation, the Civil Code of the Russian Federation, Federal Law No. 149-FZ dated 27.07.2006 "On Information, Information Technologies and Information Protection", Decree of the President of the Russian Federation No. 188 dated 6.03.1997 “On Approval of the List of Confidential Information”, Resolutions of the Government of the Russian Federation No. 1119 dated November 1, 2012 “On the Approval of the Requirements for the Protection of Personal Data When Processing in Personal Data Information Systems”, No. 687 dated September 15, 2008 “On the Approval of the Regulation on the Specifics of Processing Personal Data, Carried Out Without the Use of Automation Tools”, Orders of the Federal Service for Technology and Export Control (FSTEC of Russia) No. 21 dated February 18, 2013 “On the Approval of the Composition and Content of Organizational and Technical Measures to Ensure the Security of Personal Data When Processing Them

in Personal Data Information Systems”, the Federal Service for Supervision in the Sphere of Telecom, Information Technologies and Mass Communications (Roskomnadzor) No. 996 dated September 5, 2013 "On the Approval of the Requirements and Methods for the Anonymization of Personal Data", the Methodological Recommendations for the Application of Roskomnadzor Order No. 996 dated September 5, 2013 “On the Approval of the Requirements and Methods for the Anonymization of Personal Data”, approved by Roskomnadzor on December 13, 2013, the Charter of IPJSC Ingosstrakh and other applicable regulatory legal acts and permits.

1.5. The terms in use in this Policy are as follows:

Personal data - any information directly or indirectly relating to a certain or identifiable individual (personal data owner).

Operator - a legal entity organizing and processing personal data, as well as determining the purposes of processing personal data, list of personal data to be processed and actions (operations) involving personal data;

Personal data processing – any action (operation) or a set of actions (operations) performed on personal data with or without automation tools, including collection, recording, systematization, accumulation, storage, rectification (update, change), extraction, use, transfer (dissemination, provision, access to), anonymization, blocking, deletion, erasure of personal data;

Automated processing of personal data - processing of personal data using computer technology;

Dissemination of personal data - actions aimed at the disclosure of personal data to an indefinite scope of persons;

Provision of personal data - actions aimed at the disclosure of personal data to a specific person or a specific scope of persons;

Personal data erasure – actions resulting in inability to restore personal data in the personal data information system and/or resulting in destruction of tangible media with personal data.

2. MAIN OBJECTIVES AND PRINCIPLES OF PERSONAL DATA PROCESSING

2.1. The Operator processes personal data on a legal and fair basis.

2.2. The Company uses personal data only for the purposes specified during their collection, as well as for the purposes of fulfilling the requirements of the applicable legislation. The collection, storage and processing of personal data are carried out by the Company in accordance with the following purposes:

2.2.1. ensuring the protection of human and civil rights and freedoms of the personal data owner when processing their personal data;

2.2.2. provision of access to the Website functionality;

2.2.3. registration and provision of access to the personal account of the Website user.

The Operator and other persons, who have gained access to personal data, are obliged not to disclose to any third parties and not to disseminate/provide personal data without the consent of the personal data owner, unless otherwise established by FZ-152.

- 2.3. The Operator has the right to entrust the personal data processing to another person with the consent of the personal data owner, unless otherwise established by FZ-152, on the basis of a contract concluded with this person. A person who processes personal data on behalf of the Operator is obliged to comply with the principles and rules for processing personal data provided for by FZ-152.
- 2.4. When processing personal data, the Operator ensures their accuracy and sufficiency. The Operator takes the necessary measures or ensures their adoption to delete or rectify incomplete or inaccurate data.
- 2.5. The storage of personal data shall be carried out by the Operator in a form that allows determining the personal data owner and for no longer than it is required for the purpose of the personal data processing. After the purpose of storing personal data has been achieved, such data are subject to deletion.

3. CONSENT OF THE OWNER OF PERSONAL DATA TO THEIR PROCESSING

- 3.1. The personal data owner makes a decision on the provision of their personal data and gives their consent to their processing of their own free will and volition and for their own benefit. Consent to the personal data processing can be given by the personal data owner or their representative in any form allowing to confirm the fact of its receipt, unless otherwise established by FZ-152.
- 3.2. The obligation to provide proof of receipt of the consent of the personal data owner to the processing of their personal data or proof of the existence of the grounds specified in FZ-152 rests with the Operator.
- 3.3. For the purposes specified in clause 2.2 of the Regulation, the user provides the following personal data:
 - 3.3.1. personal data provided by the user when registering (creating an account) or while using the Services, including but not limited to: full name, e-mail.
 - 3.3.2. data transferred to the Services automatically via the software installed on the user's device, including but not limited to: IP address, information about the user's browser.

4. RIGHTS OF THE PERSONAL DATA OWNERS

- 4.1. The personal data owner has the right to receive from the Operator information regarding the processing of their personal data, if such a right is not limited in accordance with the legislation of the Russian Federation.
- 4.2. At the request of the personal data owner, the Operator is obliged to immediately stop processing their personal data.
- 4.3. The personal data owner may request the Operator to rectify, block or destroy their personal data if the personal data are incomplete, outdated, inaccurate, illegally obtained or not required for the purpose for which they intended to be processed and take measures available under the law to protect their rights.

- 4.4. The personal data owner has the right to demand the Operator to ensure the security of the personal data received. The security of personal data being processed by the Operator is ensured by the implementation of legal, organizational and technical measures necessary to meet the requirements of the legislation of the Russian Federation in the field of personal data protection.

To prevent unauthorized access to personal data, the Operator may take the following organizational and technical measures:

- appointment of persons responsible for organization of processing and protection of personal data;
- limitation of the number of persons having access to personal data;
- familiarization of the owners with the requirements of the legislation of the Russian Federation and the documents of the Operator on the processing and protection of personal data;
- organization of recording, storage and circulation of information carriers;
- identification of threats to the security of personal data during their processing, formation of threat models based on them;
- development of a personal data protection system based on the threat model;
- checking the readiness and effectiveness of the use of information security tools;
- differentiation of user access to information resources and data processing software and hardware;
- registration and recording of actions of users of personal data information systems;
- use of anti-virus tools and means of restoring the personal data protection system;
- use of firewalling, intrusion detection, security analysis and cryptographic information protection means, as needed;
- organization of access control procedure on the Operator's premises, protection of rooms with technical means for personal data processing.

5. FINAL PROVISIONS

- 5.1. The Operator reserves the right to amend the Policy; the new version of the Policy comes into force from the time it is posted on the Operator's website.
- 5.2. The Website contains links to other websites on the Internet. The Operator is not responsible for the personal data processing policies of other websites on the Internet.
- 5.3. The Operator shall collect, record, systematize, accumulate, store, rectify (update, change), extract, use, transfer (disseminate, provide, give access to), anonymize, block, delete and destroy personal data of the User.

Personal data provided by the User is processed by the Operator using the following methods:

- personal data processing using automation tools;
- non-automated processing of personal data;
- mixed processing of personal data.

5.4. Any questions regarding the Policy, as well as requests under section 4 of the Policy, can be sent to: info@ingodance.ru.