

## **Regulation on the Processing and Protection of Personal Data**

### **1. GENERAL PROVISIONS**

1.1. This Regulation on the Processing and Protection of Personal Data (hereinafter referred to as the Regulation) establishes the procedure for the processing of personal data of the subjects of personal data on the website of the limited liability company Strelka KB (OGRN 1137746792974, INN 7706799444, located at 14/5a, Bersenevskaya emb., Moscow (hereinafter referred to as the Company) – urbanindex.ru. This Regulation has been developed in accordance with current legislation of the Russian Federation.

1.2. The purpose of the development of the Regulation is to define the procedure for the processing of personal data of subjects of personal data; to ensure the protection of the rights and freedoms of subjects of personal data during personal data processing within the Company; to establish the non-disclosure of personal data, and also to establish the responsibility of officials with access to personal data for failure to comply with standard requirements regulating the processing and protection of personal data.

1.3. The purpose of personal data processing is the fulfillment by the Company of its obligations towards subjects of personal data (website users) in relation to the use of the website and its services (including but not limited to):

- ensuring the observation of the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation;
- registering subjects of personal data on the website;
- identifying a subject of personal data and establishing feedback with him;
- providing a subject of personal data with access to the use of website services and also for the distribution of information via mailing lists;
- conducting analytics on the age and sex composition of the website audience in order to understand its needs and improve products, services and website information content;
- for other legitimate purposes.

1.4. The Company processes the following data:

- Technical data which are automatically transmitted by the device used by the website user, including the information saved in cookies.

### **2. GENERAL DEFINITIONS AND CONTENTS OF PERSONAL DATA**

Personal data shall mean any information relating to a directly or indirectly identified or identifiable individual (subject of personal data). Subjects' personal data are confidential.

Subjects of personal data (subject; subjects) shall mean individuals who use the Company's website.

Personal data processing shall mean any action (operation) or set of actions (operations) performed on personal data, whether or not by automatic means, such as collection, recording, systematization, accumulation, storage, clarification (updating, alteration), retrieval, use, transmission (dissemination, disclosure, access), anonymization, blocking, erasure, destruction.

Automatic personal data processing shall mean personal data processing using computer equipment.

Personal data disclosure shall mean actions aimed at making personal data available to a specific individual or a specific group of individuals.

Personal data dissemination shall mean actions aimed at making personal data available to an indefinite group of individuals.

Personal data use shall mean actions (operations) with personal data performed by a Company official in order to make decisions or take other actions that either have legal implications for the subjects of personal data or other individuals, or in any other way affect their rights and freedoms or the rights and freedoms of other individuals.

Personal data blocking shall mean a temporary termination of personal data processing (excluding cases that require personal data processing for clarification).

Personal data destruction shall mean actions as a result of which it becomes impossible to restore personal data content in the personal data information system and/or as a result of which tangible media with personal data are destroyed.

Personal data anonymization shall mean actions as a result of which it becomes impossible to determine the ownership of personal data by a specific subject of personal data without the use of additional information.

The personal data information system shall mean the sum of personal data contained in databases, as well as information technologies and technical means that perform personal data processing.

Transborder transmission of personal data shall mean the transmission of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

### 3. PERSONAL DATA COLLECTION

#### 3.1. The procedure for collection of personal data

3.1.1. A subject of personal data takes a decision on the provision of his personal data and gives consent to its free processing in accordance with his will and in his interest. The consent to personal data processing should be specific, informed and deliberate. The consent to personal data processing can be withdrawn by the subject of personal data.

3.2. In order to receive personal data the Company requests the subject of personal data to give consent to personal data processing in cases stipulated by law (hereinafter referred to as the Consent).

### 4. PERSONAL DATA STORAGE

#### 4.1. Storage and use of personal data

4.1.1. Personal data can be obtained, processed and transmitted for storage both on paper and electronic media.

4.1.2. The Company stores personal data for no longer than is required for personal data processing, if the storage period for personal data is not specified. Processed personal data are subject to destruction or anonymization upon the achievement of the purpose of processing, or in the case of the loss of the necessity of achieving this purpose, if otherwise is not stipulated by current legislation.

## 5. ACCESS TO PERSONAL DATA

5.1. Subjects of personal data whose personal data are processed by the Company have the right to:

- receive information related to the processing of their personal data, including the following:
  1. a confirmation of the fact of personal data processing by the Company;
  2. the legal foundations and the purpose of personal data processing;
  3. the purpose and means of personal data processing applied by the Company;
  4. the Company's name and location, information on individuals (excluding Company employees) who have access to personal data, or to whom personal data may be disclosed based on a contract with the Company, or based on federal law;
  5. processed personal data related to the corresponding subject of personal data and their source, if another procedure for making such data available is not stipulated by law;
  6. the period of personal data processing including the period of storage;
  7. the procedure for exercising the rights provided by Federal Law d.d. 27.07.2006 № 152–FL On Personal Data by the subject of personal data;
  8. information on implemented or assumed transborder data transmission;
  9. name or first name, surname, paternal name and address of the individual performing personal data processing on the Company's behalf, if the processing is or will be charged to such an individual;
  10. other information provided by federal laws.
- require clarification of their personal data from the Company, their blocking or destruction if the personal data are incomplete, outdated, inaccurate, illegally obtained or are unnecessary for the claimed processing purpose.
- exercise other rights provided by law.

5.1.2. The subject of personal data is obliged to inform the Company in a timely manner regarding changes to personal data.

5.1.3. The Company is obliged to provide notification regarding the possession of personal data, as well as provide the opportunity to become familiarized with such personal data within 30 (thirty) days from the date of receipt of a request, if another term is not stipulated by legislation. The corresponding request shall include the number of the main identification document confirming the identity of the subject of personal data or his legal representative, the date of issue of the specified document and the issuing body, and the signature of the subject of personal data or his legal representative. The Company is obliged to provide the subject of personal data, or his legal representative, with information on the personal data in an intelligible form, at the same time they should not include personal data related to other subjects of personal data, except in cases stipulated by law.

## 6. PERSONAL DATA PROTECTION AND DESTRUCTION

6.1. Personal data protection

6.1.1. The safety of personal data is achieved through the elimination of unsanctioned access, including accidental, to personal data which could cause the destruction, alteration, blocking, copying, dissemination of personal data, or other unsanctioned actions.

6.1.2. During personal data processing the Company is obliged to take the necessary legal, organizational and technical measures, or ensure that they are taken, in order to protect

personal data from illegal or accidental access, destruction, alteration, blocking, copying, disclosure, dissemination, and from other illegal actions in relation to personal data.

6.1.3. Ensuring personal data safety is achieved, in particular, through the following:

1. identifying threats to the safety of personal data during their processing in information systems;
2. applying organizational and technical measures to ensure the safety of personal data during their processing in personal data information systems which are necessary to meet the requirements for personal data protection;
3. applying a compliance assessment of the means of information protection performed according to the established procedure;
4. assessing the performance of applied measures on ensuring personal data safety before the personal data information system is put into operation;
5. maintaining an inventory of personal data computer media;
6. identifying instances of unsanctioned access to personal data and taking measures;
7. restoring personal data modified or destroyed due to unsanctioned access to them;
8. establishing the rules of access to personal data processed in the personal data information system and also ensuring registration and recording of all actions performed with personal data in the personal data information system;
9. maintaining control over applied measures on ensuring the safety of personal data and the level of protection for personal data information systems.

6.1.4. The Company shall ensure the protection of personal data from illegal use or loss.

6.1.5. In order to ensure the protection of personal data it is necessary to observe a number of measures (including but not limited to):

- rational distribution of employee workplaces to exclude the unsanctioned use of confidential information;
- familiarization of Company employees with the requirements of regulatory and procedural documents on personal data protection;
- provision of the necessary conditions for work with confidential documents and databases;
- identification and regulation of employees with the right to access to personal data;
- definition of the procedure for personal data storage;
- timely identification of violations of legislative requirements on the protection of confidential information by the Company's employees;
- other measures required in accordance with legislation on the safety of personal data.

6.1.6. Confidentiality measures during personal data collection, processing and storage are applied to both paper and electronic (automatic) media.

6.1.7. The Company has the right to use methods of technical protection and other methods of personal data protection that comply with legislation of the Russian Federation.

## 6.2. Personal data clarification, blocking and destruction

6.2.1. If the illegal processing of personal data or inaccurate personal data is identified in connection with an application or request from a subject of personal data or his representative, the Company is obliged to block the illegally processed personal data related to this subject of personal data, or to ensure their blocking.

6.2.2. If the inaccuracy of personal data is confirmed, the Company is obliged to clarify the personal data or ensure their clarification based on data presented by the subject of personal data or his representative, or based on other necessary documents, or to ensure their destruction.

6.2.3. If the purpose of personal data processing is achieved, the Company is obliged to stop personal data processing or to ensure it is stopped and to destroy the personal data, or to ensure their destruction.

6.2.4. If the subject of personal data withdraws his consent to personal data processing, the Company is obliged to stop their processing, or to ensure it is stopped, as well as to destroy the personal data or to ensure their destruction, if the storage of the personal data is no longer necessary for personal data processing.

## 7. ACCESS TO PERSONAL DATA

7.1. The right of access to subjects' personal data within the Company is provided to:

- the Company's Director;
- those responsible for the organization of personal data processing appointed by an order of the Company's Director ;
- employees performing personal data processing;
- subjects of personal data or their authorized representatives;

7.2. Specified individuals have the right to receive access only to those personal data that are necessary for them to perform specific functions; at the same time, copying and making extracts is only allowed with written permission from the person responsible for the organization of personal data processing or based on a direct request from the subject of personal data or his representative.

## 8. RESPONSIBILITY FOR DISCLOSURE OF INFORMATION RELATED TO PERSONAL DATA OF SUBJECTS OF PERSONAL DATA

8.1. Individuals guilty of violating the norms regulating the collection, processing and protection of subjects' personal data are subject to disciplinary, administrative, civil or criminal responsibility in accordance with legislation of the Russian Federation.

8.2. Moral damage inflicted on the subject of personal data as a result of a violation of his rights, the rules for personal data processing and also requirements in relation to personal data protection stipulated by the law of the Russian Federation is subject to reimbursement in accordance with legislation of the Russian Federation