

Personal Data Processing Policy

1. General Provisions

This Personal Data Processing Policy has been compiled in accordance with the requirements of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" (hereinafter referred to as the Personal Data Law) and defines the procedure for processing personal data and measures to ensure personal data security taken by LLC "EUROSPORTFINANCE" (hereinafter referred to as the Operator).

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

1.2. This policy of the Operator regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator may obtain about visitors to the website

<https://www.erbelia.ru>.

2. Basic Concepts Used in the Policy

2.1. Automated processing of personal data — processing of personal data using computer technology.

2.2. Blocking of personal data — temporary termination of personal data processing (unless processing is necessary to clarify personal data).

2.3. Website — a collection of graphic and information materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address <https://www.erbelia.ru>.

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. Anonymization (depersonalization) of personal data — actions resulting in the inability to determine, without using additional information, the ownership of personal data to a specific User or other personal data subject.

2.6. Processing of personal data — any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion, and destruction of personal data.

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

2.8. Personal data — any information relating directly or indirectly to a specific or identifiable User of the website <https://www.erbelia.ru>.

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

2.10. User — any visitor to the website <https://www.erbelia.ru>.

2.11. Provision of personal data — actions aimed at disclosing personal data to a specific person or a specific circle of persons.

2.12. Dissemination of personal data — any actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or familiarizing an unlimited number of persons with personal data, including publishing personal data in the media, placing it 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 state to an authority of a foreign state, a foreign individual, or a foreign legal entity.

2.14. Destruction of personal data — any actions resulting in irreversible destruction of personal data without the possibility of further restoring the content of personal data in the personal data information system and/or destruction of physical media containing personal data.

3. Basic Rights and Obligations of the Operator

3.1. The Operator has the right to:

- receive accurate information and/or documents containing personal data from the personal data subject;
- in case of revocation of consent to the processing of personal data by the personal data subject, as well as upon sending a demand to cease the processing of personal data, 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 provided for 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. The Operator is obliged to:

- provide the personal data subject, upon their request, with information regarding the processing of their personal data;
- organize the processing of personal data in the manner established by the applicable legislation of the Russian Federation;
- respond to inquiries and requests from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
- report to the authorized body for the protection of personal data subjects' rights, upon request of this body, the necessary information within 10 days from the date of receipt of such request;
- publish or otherwise provide open access to this Policy regarding the processing of personal data;
- take legal, organizational, and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution, as well as from other unlawful actions in relation to personal data;
- cease the transfer (dissemination, provision, access) of personal data, cease processing, and destroy personal data in the manner and cases provided for by the Personal Data Law;
- perform other duties provided for by the Personal Data Law.

4. Basic Rights and Obligations of Personal Data Subjects

4.1. Personal data subjects have the right to:

- receive information regarding the processing of their personal data, except in cases provided for by federal laws. Information shall be provided to the personal data subject by the Operator in an accessible form, and it must not contain personal data relating to other personal data subjects, except when there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Personal Data Law;
- require the operator to clarify their personal data, block it, or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained, or is not necessary for the stated purpose of processing, as well as take legal measures to protect their rights;
- put forward a condition of prior consent when processing personal data for the purpose of marketing goods, works, and services on the market;
- revoke consent to the processing of personal data, as well as send a demand to cease the processing of personal data;
- appeal unlawful actions or omissions of the Operator during the processing of their personal data to the authorized body for the protection of personal data subjects' rights or in court;
- exercise other rights provided for by the legislation of the Russian Federation.

4.2. Personal data subjects are obliged to:

- provide the Operator with accurate data about themselves;
- inform the Operator about the clarification (updating, changing) of their personal data.

4.3. Persons who have provided the Operator with inaccurate information about themselves or information about another personal data subject without the latter's consent bear liability in accordance with the legislation of the Russian Federation.

5. Principles of Personal Data Processing

- 5.1. Personal data processing is carried out on a lawful and fair basis.
- 5.2. Personal data processing is limited to achieving specific, predefined, and lawful purposes. Processing of personal data incompatible with the purposes of personal data collection is not permitted.
- 5.3. Merging databases containing personal data processed for purposes incompatible with each other is not permitted.
- 5.4. Only personal data that meets the purposes of their processing shall be subject to processing.
- 5.5. The content and scope of processed personal data correspond to the stated purposes of processing. Excessiveness of the processed personal data in relation to the stated purposes of their processing is not permitted.
- 5.6. When processing personal data, the accuracy of personal data, its sufficiency, and, where necessary, relevance in relation to the purposes of personal data processing are ensured. The Operator takes necessary measures and/or ensures their implementation to remove or clarify incomplete or inaccurate data.
- 5.7. Storage of personal data is carried out in a form that allows identifying the personal data subject for no longer than required by the purposes of personal data processing, unless the storage period for personal data is established by federal law, or a contract to which the personal data subject is a party, beneficiary, or guarantor. Processed personal data is destroyed or anonymized upon achieving the processing purposes or in case of loss of the need to achieve these purposes, unless otherwise provided by federal law.

6. Purposes of Personal Data Processing

Purpose of processing	Providing access to the User to services, information, and/or materials contained on the website
Personal data	Full name, phone numbers
Legal grounds	Contracts concluded between the operator and the personal data subject
Types of personal data processing	Collection, recording, systematization, accumulation, storage, destruction, and anonymization of personal data; Sending information emails to the email address

7. Conditions for Personal Data Processing

- 7.1. Personal data processing is carried out with the consent of the personal data subject to the processing of their personal data.
- 7.2. Personal data processing is necessary to achieve the purposes provided for by an international treaty of the Russian Federation or by law, for the implementation of the functions, powers, and duties imposed on the operator by the legislation of the Russian Federation.
- 7.3. Personal data processing 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.
- 7.4. Personal data processing is necessary for the execution of a contract to which the personal data subject is a party, beneficiary, or guarantor, as well as for 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.
- 7.5. Personal data processing is necessary to exercise the rights and legitimate interests of the operator or third parties, or to achieve socially significant goals, provided that the rights and freedoms of the personal data subject are not violated.
- 7.6. Personal data, access to an unlimited number of persons to which is provided by the personal data subject or at their request (hereinafter referred to as publicly available personal data), is processed.
- 7.7. Processing of personal data subject to publication or mandatory disclosure in accordance with federal law is carried out.

8. 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 to fully comply with the requirements of applicable legislation in the field of personal data protection.

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

8.2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of applicable legislation or if the personal data subject has given consent to the Operator to transfer data to a third party to fulfill obligations under a civil law contract.

8.3. In case of detecting inaccuracies in personal data, the User can update them independently by sending a notification to the Operator's email address Reservation Erbelia reservation@erbelia-rosakhutor.ru marked "Personal Data Update".

8.4. The period of personal data processing is determined by the achievement of the purposes for which the personal data was collected, unless another period is provided for by contract or applicable legislation. The User may at any time revoke their consent to the processing of personal data by sending a notification to the Operator via email to the Operator's email address reservation@erbelia-rosakhutor.ru marked "Revocation of Consent for Personal Data Processing".

8.5. All information collected by third-party services, including payment systems, communication tools, and other service providers, is stored and processed by specified persons (Operators) in accordance with their User Agreement and Privacy Policy. The personal data subject shall familiarize themselves with the specified documents. The Operator is not responsible for the actions of third parties, including the service providers specified in this paragraph.

8.6. Prohibition on transfer (except for granting access), as well as on processing or conditions of processing (except for obtaining access) of personal data authorized for dissemination established by the personal data subject, do not apply in cases of processing personal data in state, public, and other public interests defined by the legislation of the RF.

8.7. The Operator, when processing personal data, ensures the confidentiality of personal data.

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

8.9. A condition for terminating personal data processing may be the achievement of personal data processing purposes, expiration of the personal data subject's consent, revocation of consent by the personal data subject or a demand to cease personal data processing, as well as the identification of unlawful personal data processing.

9. List of Actions Performed by the Operator with Received Personal Data

9.1. The Operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (dissemination, provision, access), anonymizes, blocks, deletes, and destroys personal data.

9.2. The Operator carries out automated processing of personal data with the receipt and/or transmission of the received information via information and telecommunication networks or without it.

10. Cross-border Transfer of Personal Data

10.1. Prior to commencing activities related to the cross-border transfer of personal data, the Operator is obliged to notify the authorized body for the protection of personal data subjects' rights of its intention to carry out cross-border transfer of personal data (such notification is sent separately from the notification of intention to process personal data).

10.2. Prior to submitting the above-mentioned notification, the Operator is obliged to obtain relevant information from authorities of a foreign state, foreign individuals, and foreign legal entities to whom the cross-border transfer of personal data is planned.

11. Confidentiality of Personal Data

The Operator and other persons who have obtained access to personal data are obliged not to disclose to third parties and not to disseminate personal data without the consent of the personal data subject, unless otherwise provided by federal law.

12. Final Provisions

12.1. The User can obtain any clarification on issues of interest regarding the processing of their personal data by contacting the Operator via email at reservation@erbelia-rosakhutor.ru.

12.2. Any changes to the personal data processing policy by the Operator will be reflected in this document. The Policy is valid indefinitely until replaced by a new version.

12.3. The current version of the Policy is freely available on the Internet at <https://erbelia.ru/legal-information>.