**PERSONAL DATA**

**PROCESSING POLICY**

1. **GENERAL PROVISIONS**
   1. This document defines the policy (hereinafter referred to as the "Policy") of VHD Management Limited Liability Company OGRN 1177746353652 (hereinafter referred to as the "Company") in relation to the processing of personal data.
   2. This Policy has been developed and approved by the Company in accordance with the requirements of Article 18.1 of Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006 (hereinafter referred to as the "Law") and applies to all personal data processed by the Company.
   3. The purpose of this Policy is to ensure protection of human and civil rights and freedoms when processing personal data, as well as of the interests of the Company.
   4. This Policy defines the purposes, principles and conditions for processing of personal data of employees and other persons whose personal data is processed by the Company, and includes a list of measures applied to ensure security of personal data during processing thereof.
   5. The Policy applies to relations in the field of personal data processing that arise for the Company both before and after the approval of this Policy.
   6. In pursuance of Article 18.1, Part 2 of the Law, this Policy is published in the public domain on the Internet information and telecommunication network on the Website.
   7. A complex of regulations in pursuance of which and in accordance with which the Company processes personal data shall form the legal basis for the processing of personal data.
   8. The use of the Website services means the User's unconditional consent to this Policy and the User's consent to the processing of any information, including information necessary for correct operation and / or collection of statistics on the use of the Website services (including cookies) or provided by the User independently, including Personal Data, as well as the User's consent to receive information (advertising) notifications. These notifications may be provided with the use of non-voice communications (by sending short text messages via the mobile radio telephone network, sending ussd messages, etc.), by sending information via the Internet information and telecommunication network to the telephone number and /or e-mail address provided by the User.

The User confirms that he acts voluntarily and in his own interests by giving such consent.

1. **KEY TERMS AND DEFINITIONS USED IN THE POLICY**
   1. **Automated Processing of Personal Data** means processing of personal data using computer equipment.
   2. **Biometric Personal Data** means information that constitutes physiological and biological characteristics of a person, on the basis of which it is possible to identify him / her and which is used by the operator to identify the personal data subject.
   3. **Blocking of Personal Data** means a temporary suspension of the personal data processing (unless the processing is required to clarify personal data).
   4. **Personal Data Security** means the state of personal data security characterized by the ability of Users, technical means and information technologies to ensure confidentiality, integrity and availability of personal data when they are processed in personal data information systems.
   5. **Personal Data Information System** means a set of databases of personal data, information technologies and technical means that allow processing of such personal data with or without automation tools.
   6. **Confidentiality of Personal Data** means a mandatory requirement for the Company, or any other person who has obtained access to personal data, not to allow dissemination of such personal data without the User's consent or other legal grounds.
   7. **Personal Data Processing** means any action (operation) or a set of actions (operations) with personal data performed with or without the use of automation tools. The personal data processing includes, among other things:

* collection;
* recording;
* systematization;
* accumulation;
* storage;
* clarification (update, change);
* extraction;
* use;
* transfer (distribution, provision, access);
* depersonalization;
* blocking;
* deletion;
* destruction;
  1. **Publicly Available Personal Data** means personal data access to which is provided to an unlimited number of persons with the consent of the User or to which the confidentiality requirement does not apply in accordance with the federal laws.
  2. **Depersonalization of Personal Data** means actions that make it impossible to identify the ownership of Personal Data by a particular User without the use of additional information.
  3. **Provision of Personal Data** means actions aimed at disclosing personal data to a certain person or a certain group of persons.
  4. **Personal Data** means any information related to a directly or indirectly identified or identifiable individual (personal data subject - the User).
  5. **User** means a person who uses and / or intends to use the Website and is the subject of the Personal Data;
  6. **Dissemination of Personal Data** means actions aimed at disclosing of personal data to an indefinite number of persons.
  7. **Website** means a set of programs for electronic computers and other information, access to which is provided through the Internet information and telecommunication network [asterus-development.com]
  8. **Cross-Border Transfer of Personal Data** means the transfer of personal data to the territory of a foreign state to a foreign state authority, a foreign individual or a foreign legal entity.
  9. **Destruction of Personal Data** means actions that make it impossible to restore the content of personal data in the personal data information system and / or that result in destruction of tangible media of personal data.

1. **PURPOSES OF PERSONAL DATA COLLECTION AND PROCESSING**
   1. The processing of personal data shall be limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not permitted.
   2. Only personal data that meet the purposes of such processing may be processed.
   3. The Company processes personal data for the following purposes:

* ensuring compliance with the Constitution of the Russian Federation, laws and other regulations of the Russian Federation, local regulations of the Company;
* conclusion of any contracts and agreements with the User and further performance thereof;
* carrying out its activities;
* provision of information about the Company, its services, promotions and events;
* communication with the User;
* sending news and / or advertising materials to the User;
* ensuring the functioning, security and improvement of the quality of the Website;
* implementation of the access control;
* as well as other purposes, achievement of which is not prohibited by federal laws, international treaties of the Russian Federation.
  1. The personal data of the Users may be processed solely for the purpose of ensuring of compliance with the laws and other regulations.
  2. The Personal Data shall be processed by the Company in accordance with the following principles:
* legality of the purposes and methods of Personal Data processing;
* compliance of the purposes of Personal Data processing with the purposes defined and declared in advance upon Personal Data collecting;
* compliance of the range and scope of Personal Data processed, as well as the methods of Personal Data processing, with the stated purposes of processing;
* reliability of Personal Data, its sufficiency for the purposes of processing, prohibition of the processing of Personal Data that is excessive in relation to the purposes stated upon Personal Data collecting;
* prohibition of the processing of Personal Data incompatible with the purposes of Personal Data collecting;
* ensuring the storage of Personal Data for no longer than required by the purposes of the Personal Data Processing, unless the period of Personal Data storage is established by the applicable laws or any agreement between the User and the Company;
* destruction or depersonalization of Personal Data upon achievement of purposes of processing or in case of loss of the need to achieve these purposes, unless otherwise established by the applicable laws or any agreement between the User and the Company.

1. **SCOPE AND CATEGORIES OF PERSONAL DATA PROCESSED**
   1. The processing of Personal Data shall be limited to the achievement of specific, predetermined and legitimate purposes. Processing of Personal Data that is incompatible with the purposes of collecting Personal Data is not permitted.
   2. The Company may process the following Personal Data of the User:

* surname, name, patronymic;
* contact details (including but not limited to: telephone number, e-mail address, identifiers in social networks, etc.);
* other personal data provided by the User.
  1. The Company does not process any special categories of personal data related to race, ethnicity, political views, religious or philosophical beliefs, health status, or intimate life, except in cases stipulated by the laws of the Russian Federation.

1. **TERMS AND CONDITIONS OF PERSONAL DATA PROCESSING**
   1. Personal data shall be processed in compliance with the principles and rules established by the Law.
   2. The Company shall process Personal Data both with and without the use of automation tools (automated and / or manual Processing of Personal Data).
   3. The Company may include the User's Personal Data in public sources of Personal Data, and in this case the Company takes the User's written consent to the Personal Data Processing.
   4. Biometric Personal Data is not processed in the Company.
   5. The Company does not perform Cross-Border Transfer of personal data.
   6. Employees of the Company, whose employment duties include processing of personal data, are allowed to process personal data.
   7. Personal Data is processed by:
      1. receiving Personal Data orally and in writing directly from the User;
      2. receiving Personal Data from public sources;
      3. entry / provision of Personal Data by the User through the Website services and / or entry / provision of Personal Data by the User in the logs, registers and other information systems of the Company;
      4. using other methods of Personal Data Processing.
   8. Disclosure to third parties and dissemination of Personal Data without the User's consent is not allowed, unless otherwise provided for by applicable law
   9. If there is no need for the User's written consent to the processing of his / her Personal Data, such consent may be given by the User or his / her representative in any form that makes it possible to obtain the fact of its receipt, in particular, the consent shall be deemed to be given if the User uses the services of the Website;
   10. The Company may entrust the processing of Personal Data to another person with the consent of the User, unless otherwise stipulated by the applicable laws, under a contract concluded with this person. And in this contract, the Company shall oblige the person who processes the Personal Data on behalf of the Company to comply with the principles and rules for processing personal data provided for by the Law.
   11. Access to Personal Data processed by the Company shall be provided to public authorities (including regulatory, supervisory, law enforcement and other authorities) to the extent and in accordance with the procedure established by the relevant laws.
2. **RIGHTS AND OBLIGATIONS OF THE USER (PERSONAL DATA SUBJECT)**
   1. The User may:
      1. receive information related to the processing of his / her Personal Data in the manner, form and terms established by the law;
      2. demand that his / her Personal Data be clarified, blocked and destroyed if Personal Data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;
      3. take measures provided for by the laws to protect his / her rights;
      4. withdraw his / her Consent to the processing of personal data by sending a written notice thereof to the Company;
      5. use all the services available on the Website;
      6. use the Website solely for the purposes and in the manner prescribed by the Agreement and not prohibited by the laws of the Russian Federation.
   2. The User (Personal Data Subject) shall provide complete, accurate and reliable information about his / her Personal Data.
3. **RIGHTS AND OBLIGATIONS OF THE COMPANY UPON PERSONAL DATA PROCESSING**
   1. The Company may:
      1. process the User's Personal Data in accordance with the stated purpose;
      2. require the User to provide reliable Personal Data necessary for the conclusion, performance of the agreement, provision of the service, identification of the personal data subject, as well as in other cases provided for by the laws on personal data;
      3. restrict the User's access to his / her Personal Data in cases stipulated by the laws of the Russian Federation;
      4. process publicly available Personal Data of individuals;
      5. process Personal Data subject to publication or mandatory disclosure in accordance with the laws of the Russian Federation;
      6. clarify the processed Personal Data, block or delete, if such Personal Data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing;
      7. entrust the processing of Personal Data to another person with the consent of the User.
   2. In accordance with the requirements of the Law, the Company shall:
      1. provide the User, upon his / her request, with information regarding the processing of his / her Personal Data, or provide a refusal on a legal basis;
      2. upon the User's request, clarify the processed Personal Data, block or delete, if such Personal Data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing;
      3. keep records of Users' accesses;
      4. notify the User about the Personal Data Processing if the Personal Data is not received from the User, except in cases stipulated by the laws of the Russian Federation;
      5. if the purpose of personal data processing is achieved, stop Personal Data Processing and destroy the relevant Personal Data within a period not exceeding thirty days from the date of achievement of the purpose of Personal Data Processing, unless otherwise stipulated by the agreement with the User;
      6. if the User revokes his / her consent to the processing of his / her Personal Data, stop Personal Data Processing and destroy personal data within a period not exceeding thirty days from the date of receipt of the said revocation, unless otherwise stipulated by the agreement with the User.
4. **PERSONAL DATA SECURITY MEASURES**
   1. When Processing Personal Data, the Company shall take the necessary legal, organizational, and technical measures to protect Personal Data against unauthorized or accidental access, destruction, alteration, blocking, copying, provision, dissemination as well as other illegal actions in respect of personal data.
5. **FINAL PROVISIONS**
   1. This Policy is an internal document of the Company, is publicly available and shall be posted on the official Website.
   2. The Company may make changes to this Policy without additional notifications. The innovations come into force from the moment of their publication.
   3. Users can track changes to the Privacy Policy on their own.
   4. This Policy and the relationship between the User and the Company arising in connection with the application of the Policy shall be governed by the law of the Russian Federation.