

PRIVACY AND PERSONAL DATA PROCESSING POLICY

Yekaterinburg

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1. GENERAL PROVISIONS

This document defines the policy of individual entrepreneur Natalia Firsova, TIN: 665802377541, OGRNIP: 324665800143318 (hereinafter referred to as the Operator) regarding the processing and confidentiality of personal data and information. The policy also explains how the Operator processes and protects personal data of subjects and other user information.

The Policy regulates relations between the Operator and any individual (client, client's representative, Website users and other persons specified in paragraph 3 of the Policy) regarding the processing of personal data of these persons provided by them to the Operator.

The Policy applies to all Personal Data processing operations performed by the Operator, as well as to all information that the Operator and/or other authorized persons acting on behalf of the Operator may receive about the User while using any of the Operator's Products.

The Policy is mandatory for all persons acting on behalf of the Operator, authorized to process personal data, and persons involved in organizing the processes of processing and ensuring the security of personal data.

The Policy is subject to updating in the following cases:

- changes in the legislation of the Russian Federation on personal data;
- * identification of inconsistencies affecting the processing and (or) protection of personal data, based on the results of monitoring compliance with the requirements for processing and (or) protection of personal data;
- by the Operator's decision.

2. BASIC TERMS

Personal data (PD) — any information relating directly or indirectly to a specific or identifiable natural person (subject of personal data);

Personal data operator (operator) — a person who independently or jointly with other persons organizes and / or performs the processing of personal data, as well as determines the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data;

Processing of personal data — any action (operation) or a set of actions (operations) with personal data performed with or without the use of automation tools.

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

Website – a set of graphic and informational materials, as well as computer programs and databases that ensure their availability on the Internet at a network address <https://firsovaacademy.ru/eng>

Dissemination of personal data — actions aimed at disclosing personal data to an indefinite group of persons;

Provision of personal data — actions aimed at disclosing personal data to a certain person or a certain group of persons;

Destruction of personal data — actions that make it impossible to restore the content of personal data in the personal data information system and (or) as a result of which the material carriers of personal data are destroyed;

Depersonalization of personal data — actions that make it impossible to determine whether personal data belongs to a specific personal data subject without using additional information;

Personal data information system — a set of personal data contained in databases and information technologies and technical means that ensure their processing;

Cross-border transfer of personal data — transfer of personal data on the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

This Policy may use other terms not defined above, which will be interpreted in accordance with Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" (hereinafter referred to as the Law).

3. PROCESSING OF PERSONAL DATA BY THE OPERATOR

3.1. Purposes, legal grounds and terms of Personal Data Processing

The Operator processes Personal Data for the following purposes:

**When specifying the category of the subject "Counterparty", customers and partners are understood, except for cases where a clarification is given.*

№	Purpose of personal data processing	Category of personal data subjects	Category of PD	List of PD	Terms	of processing Type of personal data	processing Legal basis for personal data processing
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1	Formation and provision of statutory reporting, including payment of statutory taxes and contributions	Counterparty (individual)	General / Other	(1) FULL NAME; (2) TIN; (3) contact phone number; (4) e-mail address;	(1) Contract validity period; (2) 5 years after the expiration of the contract; (3) application of a personal data subject for termination of processing or destruction of personal	data Mixed	(1) Performance of functions, powers and duties assigned to the Operator by law (Section 6 (1) (2) of the Law)
2	Performance of the duties assigned to the Operator in connection with the right of authorized bodies to receive the requested information from the Operator	Representatives of authorized bodies	General / other	(1) FULL names; (2) position and title; (3) place of work; (4) contact details.	(1) Until the termination the termination of the business, of the Operator's entrepreneurial activity	, Mixed	(1) Performance of the functions, powers and duties assigned to the Operator by law (Article 6 (1) (2) of the Law)
3	Conclusion, execution, modification and termination of a contract to which the Operator or authorized persons acting on behalf of the Operator	are a party Counterparty (individual)	General / Other / Special	(1) FULL NAME; (2) TIN; (3) contact phone number; (4) e-mail address; (5) bank details	(1) Period of validity of the contract (2) 5 years prior to termination of business activity by the Operator (depending on the subject) (3) application of the PD subject on termination of processing or destruction of Personal	data Mixed	(1) Execution of a contract, the party/beneficiary of which is the subject/conclusion on the initiative of the subject of the contract, under which he will be the beneficiary (clause 5 of part 1 of Article 6 of the Law); (2) The subject's consent to the processing of personal data (Section 10 (2) (1) of the Law).

4	Conclusion, execution, modification and termination of a contract to which the Operator	is a party Representative of the Counterparty	General / other	(1) Full name; (2) contact phone number; (3) e-mail address; (4) details of the power of attorney for the representative.	(1) The period of validity of the contract (2) 5 years before the termination of business activity by the Operator	is Mixed	(1) Execution of the contract, the party/beneficiary of which is the subject/conclusion on the initiative of the subject of the contract, under which he will be the beneficiary (clause 5 of part 1 of Article 6 of the Law);
5	Technical support and advice	to the Counterparty - Client/Partner (individual)	General / Other	(1) FULL NAME; (2) contact phone number; (3) e-mail address;	(1) Period of validity of the contract	Automated	(1) Execution of the contract, the party/beneficiary of which is the subject/conclusion at the initiative of the subject of the contract, under which he will be the beneficiary (clause 5 of Part 1 of Article 6 of the Law);
6	Technical support and consultations	Representative of the counterparty	General / other	(1) FULL name; (2) contact phone number; (3) e-mail address; (4) details of the power of attorney for the representative.	(1) Contract validity period	Automated	(1) Execution of a contract to which the subject is a party/beneficiary / conclusion on the initiative of the subject of a contract under which he will be a beneficiary (clause 5, part 1, Article 6 of the Law)

7	Performance of obligations imposed on the Operator in connection with the need to conduct verification of counterparties	Counterparty (individual)	General / Other	(1) FULL NAME; (2) TIN; (3) contact phone number; (4) e-mail address; (5) bank details	(1) Prior to the termination of the Operator's business activity	, Automated	(1) Performance of functions, powers and duties assigned to the Operator by law (Section 6 (1) (2) of the Law); (2) The legitimate interest of the Operator (Section 6 (1) (7) of the Law);
8	Performance of the duties assigned to the Operator in connection with the need to conduct counterparty verification Counterparty	's representative	General / other	(1) FULL name; (2) contact phone number; (3) e-mail address; (4) details of the power of attorney for the representative.	(1) Prior to the termination of the Operator's business activity	, Automated	(1) Performance of the functions, powers and duties assigned to the Operator by law (Section 6 (1) (2) of the Law); (2) The legitimate interest of the Operator (Section 6 (1) (7) of the Law);
9	Implementation of information and advertising newsletters	Counterparty-Client / Partner (individual)	General / other	(1) E-mail	address(1) Prior to revocation of consent to data processing	Automated	(1) Subject's consent to PD processing (clause 1, Part 1, Article 6 of the Law)
10	Implementation of informational and advertising mailings	Webinar participant	General / other	(1) E-mail	address (1) Prior to revocation consent to data processing	Automated	(1) Subject's consent to PD processing (Clause 1, Part 1, Article 6 of the Law)

11	Organization and holding of events and	webinars Webinar participant	General / other	(1) FULL name; (2) e-mail address(3) contact phone number	(1) Before the purpose of processing is achieved(2) Before the withdrawal of consent to data processing	Automated	(1) Consent of the subject to PD processing (Article 6 (1) of the Law) (2) Execution of the contract to which the subject is a party/beneficiary/conclusion on the initiative of the subject of the contract under which he will be the beneficiary (Clause 5, part 1, Article 6 of the Law);
12	Organization and holding of events and webinars	Counterparty	General / other	(1) FULL name; (2) e-mail address(3) contact phone number	(1) Before the purpose of processing is achieved(2) Before the withdrawal of consent to data processing	Automated	(1) Consent of the subject to PD processing (Article 6 (1) of the Law) (2) Execution of a contract to which the subject is a party/beneficiary/conclusion of a contract under which the subject will be a beneficiary at the initiative of the subject (Section 6 (1) (5) of the Law);
13	Posting reviews on the Operator's website from customers and partners of the Operator in order to increase customer loyalty and form a positive attitude of users towards the Operator's products.	Counterparty (individual)	General / Other	(1) FULL NAME; (2) contact details; (3) photo image	(1) Prior to revocation of consent to data processing	Automated	(1) Consent to the processing of personal data authorized by the personal data subject for distribution (Article 10.1 of the Law)

14	Distribution of prizes / gifts	Counterparty-Partner (individual)	General / Other	(1) FULL NAME; (2) residential address; (3) the contact phone number;	(1) Contract validity period	Automated	(1) Execution of a contract to which the subject is a party/beneficiary / conclusion at the initiative of the subject of the contract under which he will be the beneficiary (clause 5, part 1, Article 6 of the Law)
15	Registration of the personal account	Counterparty/client (individual)	General / Other	(1) FULL NAME; (2) e-mail	address (1) Period of validity of the agreement	Automated	(1) Execution of the agreement to which the subject is a party/beneficiary / conclusion on the initiative of the subject of the agreement under which he will be the beneficiary (clause 5 of part 1 of Article 6 of the Law) (2) The subject's consent to the processing of personal data (Section 6 (1) (1) of the Law)

3.1.1. The Operator does not process biometric Personal Data.

3.1.2. The terms of personal data processing are determined taking into account:

(1) the established purposes of processing personal data;

(2) the terms of validity of contracts with personal data subjects and / or the consent of personal data subjects to the processing of their personal data;

(3) the terms defined by the regulatory legal acts of the Russian Federation.

3.2. Principles and conditions of Personal Data Processing by the Operator.

3.2.1. The Operator processes Personal Data on a legal and fair basis.

3.2.2. When Processing Personal Data, their accuracy, sufficiency, and relevance in relation to the purposes of Personal Data Processing are ensured.

3.2.3. The Operator processes Personal Data using automation tools and without their use. At the same time, the Operator fulfills the requirements for automated and non-automated processing of personal data provided for by the Law and regulatory legal acts adopted in accordance with it.

3.2.4. The Operator does not disclose or distribute Personal Data to third parties, except in the following cases:

(1) The PD Subject has expressed its consent to such disclosure in advance.

(2) The transfer is necessary for the performance of a contract to which the Personal Data subject is a party or a beneficiary or guarantor, as well as for the conclusion of a contract on the initiative of the Personal Data subject or a contract under which he will be a beneficiary or guarantor.

(3) The transfer is necessary to protect the rights and legitimate interests of the Operator or third parties;

(4) The Transfer is initiated by the Personal Data subject.

(5) The transfer is necessary for the administration of justice, the execution of a judicial act, an act of another body or official that is subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings or in other cases provided for by the current legislation of the Russian Federation.

3.3. Conditions and restrictions on the processing of personal data authorized by the subject for distribution.

3.3.1. The Operator, on the basis of a separate consent of the Personal Data subject, processes certain categories of Personal Data authorized by the subject for distribution and access to an unlimited number of persons by posting them on the site, including in presentations, articles, photos, audio and other works, in advertising on the Internet, in social networks - in official groups or accounts.

3.3.2. Personal Data is posted for the purpose of (1) increasing the loyalty of users of the Operator's Websites and products; (2) forming a positive attitude of users towards the Operator's products; (3) promotion of the Operator's products, (4) as well as any goods, works and services related to these products.

3.3.3. The list of PD and the presence/absence of restrictions or prohibitions in relation to them:

List	Restrictions/prohibitions
Surname	Not installed

Name	Not installed
Middle name	Not installed
Email address	Not installed
Contact phone number	Not installed

3.3.4. Processing is carried out during the period of validity of the consent of the subject of Personal Data allowed for distribution.

3.4. Rights of Personal data subjects.

3.4.1. The Personal Data Subject has the following rights:

Subject's right	Implementation method
(1) The right to receive information concerning the processing of their Personal Data;	send a written request to: firsi-massage-face@yandex.ru
(2) The right to clarify, block or destroy data if the Personal Data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;	
(3) The right to withdraw the consent to the processing of Personal Data provided earlier.	send a corresponding notification to the Operator's address: firsi-massage-face@yandex.ru , marked "Revocation of consent to the processing of personal data". Termination of Personal Data Processing by the Operator may make it impossible to continue using the Operator's Products. The Operator stops Processing Personal Data within 10 business days.

3.4.2. In order to comply with the provisions of subclauses (1) and (3) of clause 3.4.1. of the Operator's Policy, it may be necessary to confirm the identity of the Personal Data subject, requiring such confirmation to be provided in any form that does not contradict the law.

3.5. Performance of the Operator's duties by the Operator.

3.5.1. The Operator has taken the following measures to ensure the fulfillment of the obligations stipulated by the Federal Law of the Russian Federation "On Personal Data" No. 152-FZ of July 27, 2006 and the regulatory legal acts adopted in accordance with it:

- (1) a person responsible for organizing the processing of personal data has been appointed;
- (2) local acts on the processing and security of personal data have been issued, as well as local acts establishing procedures aimed at preventing and detecting violations of the legislation of the Russian Federation and eliminating the consequences of such violations: the Privacy Policy and Personal Data processing; other local acts on the processing and security of personal data;
- (3) legal, organizational and technical measures have been applied to ensure the security of personal data;
- (4) internal control is carried out over the compliance of personal data processing with the requirements of the Law and the regulatory legal acts adopted in accordance with it, the Policy, local acts of the Operator;
- (5) an assessment has been made of the damage that may be caused to personal data subjects in the event of a violation of the requirements of the federal legislation on personal data, and a correlation has been made between the specified damage and the measures taken by the Operator to ensure the fulfillment of obligations stipulated by the requirements of the Law and regulatory legal acts adopted in accordance with it;
- (6) the Operator's contractors who directly process personal data are familiar with the provisions of the Law and the regulatory legal acts adopted in accordance with it, the Operator's Policy and local acts on personal data processing.

3.5.2. The Operator implements the following measures to ensure confidentiality and security when Processing Personal Data:

- (1) A security regime has been established for the premises where information systems are located, which prevents the possibility of uncontrolled entry or stay in these premises by persons who do not have the right of access to these premises;
- (2) The Operator has approved a document defining the list of persons whose access to personal data processed in the information system is necessary for them to fulfill their contractual obligations to the Operator;
- (3) Information security tools that have passed the procedure for assessing compliance with the requirements of the Russian Federation legislation in the field of information security are used;

(4) The requirements established by the Decree of the Government of the Russian Federation No. 687 of September 15, 2008 "On Approval of the Regulation on the Specifics of Processing Personal Data Performed without the use of automation tools" have been implemented.

3.6. Procedure for termination of Personal Data Processing.

3.6.1. The Operator terminates the processing of personal data:

- (1) upon the expiration of the specified time limits;
- (2) when the purposes of their processing have been achieved, or if it is no longer necessary to achieve these purposes;
- (3) at the request of the personal data subject (in relation to Personal Data that is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing), if it is impossible to ensure the legality of Personal Data processing;
- (4) if the personal data subject withdraws consent to the processing of his / her Personal Data (in relation to Personal Data processed on the basis of the subject's consent);
- (5) in case of termination of the Operator's business activity.

3.6.2. Procedure for Personal data destruction. Personal data is destroyed in the following cases:

- (1) illegal processing of personal data;
- (2) the PD is redundant for the stated purpose;
- (3) revocation of consent to the processing of personal data;
- (4) achievement of the purpose of PD processing or loss of the need to achieve these goals;
- (5) expiration of storage periods for PD established by regulatory legal acts of the Russian Federation
- (6) recognition of the unreliability of personal data or obtaining it illegally at the request of the authorized body for the protection of the rights of personal data subjects;
- (7) recognition of unreliability of the PD at the request of the Regulator.

3.6.3. Methods of destruction:

Destruction of personal data from information systems is carried out by the built-in means of the information system and is performed by the Operator.

Destruction of paper media containing PD is carried out by shredding papers using a shredder.

3.6.4. Upon completion of the destruction of Personal Data, the Operator draws up an Act on the destruction of Personal Data.

4. RULES FOR STORING AND PROCESSING PERSONAL DATA OF CITIZENS OF THE RUSSIAN FEDERATION, RULES ON CROSS-BORDER TRANSFER OF PERSONAL DATA

4.1. The Operator processes personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation.

4.2. The Operator, prior to performing cross-border transfer of personal data, must ensure that the foreign state to whose territory it is intended to transfer personal data provides reliable protection of the rights of personal data subjects and notify the state body authorized in the field of personal data of its intention to perform cross-border transfer of personal data in the territories of foreign states that meet the specified requirements requirements.

4.3. The Operator must obtain permission from the state body authorized in the field of personal data to carry out cross-border transfer of personal data on the territory of such foreign states prior to the implementation of cross-border transfer of personal data to the territory of a foreign state where reliable protection of the rights of personal data subjects is not provided.

5. FINAL PROVISIONS

5.1. The Policy may be changed by the Operator unilaterally by posting a new version of it on the Operator's website and its subdomains.

5.2. Contact information of the Operator:

Individual entrepreneur
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