

PERSONAL DATA PROCESSING POLICY

This Policy is a translation of the original Russian-language document. In case of any discrepancy or inconsistency, the Russian version of this Policy, available at <https://parklanespa.ru/privacy-policy/> shall prevail.

1. General Provisions

1.1. This Personal Data Processing Policy (hereinafter referred to as the "Policy") has been developed in accordance with Clause 2, Part 1, Article 18.1 of Federal Law No. 152-FZ dated 27 July 2006 "On Personal Data" for the purpose of ensuring the protection of the rights and freedoms of individuals and citizens in the processing of their personal data, including the protection of the right to privacy and personal and family confidentiality.

1.2. This Policy applies to the following categories of personal data subjects whose personal data are processed by the Operator: customers and website visitors.

1.3. Definitions used in this Policy:

Personal Data means any information relating directly or indirectly to an identified or identifiable individual (personal data subject).

Personal Data Operator (the "Operator") means Parklane LLC, Primary State Registration Number (OGRN) 1167847069367, Taxpayer Identification Number / Tax Registration Reason Code (INN/KPP) 7813242048/781301001, 197110, 9 Ryukhina Street, Letter A, Saint Petersburg, Russia, which independently or jointly with other persons organizes and/or carries out the processing of personal data and determines the purposes of processing personal data, the categories of personal data subject to processing, and the actions (operations) performed with personal data.

Processing of Personal Data means any action (operation) or set of actions (operations) performed with personal data, whether or not by automated means. Processing of personal data includes, among other things, collection, recording, systematization, accumulation, storage, clarification (updating and modification), retrieval, use, transfer (disclosure, provision, access), depersonalization, blocking, deletion and destruction.

Automated Processing of Personal Data means the processing of personal data using computer technology.

Disclosure of Personal Data means actions aimed at making personal data available to an unspecified number of persons.

Provision of Personal Data means actions aimed at making personal data available to a specific person or a specific group of persons.

Blocking of Personal Data means the temporary suspension of the processing of personal data, except where processing is necessary for clarification of the personal data.

Destruction of Personal Data means actions resulting in the impossibility of restoring the content of personal data in a personal data information system and/or resulting in the destruction of physical media containing personal data.

Depersonalization of Personal Data means actions making it impossible to determine, without the use of additional information, the attribution of personal data to a specific personal data subject.

Personal Data Information System means a set of personal data contained in databases and information technologies and technical means ensuring their processing.

Cross-Border Transfer of Personal Data means the 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.

Website means a set of computer programs and other information contained in an information system, access to which is provided through the Internet and which is located at: <https://parklanespa.ru/>.

1.4. Main rights and obligations of the Operator

1.4.1. The Operator has the right to:

- independently determine the composition and list of measures necessary and sufficient to ensure compliance with the obligations established by Federal Law No. 152-FZ dated 27 July 2006 "On Personal Data" and regulatory legal acts adopted pursuant thereto, unless otherwise provided by the legislation of the Russian Federation;
- entrust the processing of personal data to another person with the consent of the personal data subject, unless otherwise provided by federal law, on the basis of an agreement concluded with such person. A person processing personal data on behalf of

the Operator shall comply with the principles and rules governing the processing of personal data established by Federal Law No. 152-FZ "On Personal Data";

- where a personal data subject withdraws their consent to the processing of personal data, continue processing the personal data without such consent if there are grounds specified in Federal Law No. 152-FZ "On Personal Data".

1.4.2. The Operator shall:

- organize the processing of personal data in accordance with the requirements of Federal Law No. 152-FZ "On Personal Data";
- respond to requests and inquiries from personal data subjects and their legal representatives in accordance with the requirements of Federal Law No. 152-FZ "On Personal Data";
- provide the authorized body for the protection of the rights of personal data subjects (hereinafter referred to as "Roskomnadzor") with the information requested by such body within 10 business days from the date of receipt of the request.

1.5. Main rights of personal data subjects

A personal data subject has the right to:

- receive information concerning the processing of their personal data, except in cases provided for by federal laws. Such information shall be provided by the Operator in an accessible form and shall not contain personal data relating to other personal data subjects, except where there are lawful grounds for disclosure of such personal data. The list of information and the procedure for obtaining it are established by Federal Law No. 152-FZ "On Personal Data";
- require the Operator to clarify, block or destroy their personal data where the personal data are incomplete, outdated, inaccurate, unlawfully obtained or unnecessary for the stated purpose of processing, and to take other measures provided by law to protect their rights;
- challenge unlawful actions or omissions of the Operator in the processing of their personal data before Roskomnadzor or in court.

A personal data subject may exercise their right to obtain information concerning the processing of their personal data, as well as their right to have their personal data clarified, blocked or destroyed, by submitting a request to the Operator at 9 Ryukhina Street, Letter A, Saint Petersburg, 197110, Russia, or by contacting the Operator by email at reception.spa@parklanespa.ru. In both cases, the request must comply with the requirements of Section 8 of this Policy.

1.6.

Compliance with the requirements of this Policy shall be monitored by the person authorized and responsible for organizing the processing of personal data by the Operator.

1.7.

Liability for violations of the legislation of the Russian Federation and the Operator's internal regulations governing the processing and protection of personal data shall be determined in accordance with the legislation of the Russian Federation.

2. Principles of Personal Data Processing

2.1. The Operator processes personal data in accordance with the requirements of the legislation of the Russian Federation and based on the following principles:

2.1.1. Personal data shall be processed lawfully and fairly.

2.1.2. The processing of personal data shall be limited to the achievement of specific, predetermined and lawful purposes.

2.1.3. Databases containing personal data processed for purposes that are incompatible with one another shall not be combined.

2.1.4. Only personal data that meet the purposes of their processing shall be processed.

2.1.5. The content and scope of the personal data processed shall correspond to the stated purposes of processing; the personal data processed shall not be excessive in relation to the stated purposes of processing.

2.1.6. The accuracy and sufficiency of personal data shall be ensured in the course of processing and, where necessary, their relevance to the stated purposes of processing.

2.1.7. The Operator shall take the necessary measures and, where applicable, ensure that measures are taken to delete or clarify incomplete or inaccurate personal data.

2.1.8. Personal data shall be stored in a form allowing identification of the personal data subject for no longer than required by the purposes of processing, unless the storage period is established by federal law or by an agreement to which the personal data subject is a party, beneficiary or guarantor.

2.1.9. Processed personal data shall be destroyed upon achievement of the purposes of processing or where the need to achieve such purposes ceases to exist, unless otherwise provided by the legislation of the Russian Federation.

2.1.10. In its activities, the Operator assumes that the personal data subject provides accurate and reliable information when interacting with the Operator and the personal data subject shall notify the Operator's representatives of any changes to their personal data.

2.1.11. Agreements between the Operator and personal data subjects shall not contain provisions restricting the rights and freedoms of personal data subjects or make the inaction of a personal data subject a condition for entering into an agreement.

2.1.12. Documents and internal regulations adopted by the Operator shall not contain provisions restricting the rights of personal data subjects or imposing on the Operator powers and obligations not provided for by law.

3. Legal Grounds for the Processing of Personal Data

3.1. The legal basis for the processing of personal data consists of the body of regulatory legal acts pursuant to and in accordance with which the Operator processes personal data, including:

- the Constitution of the Russian Federation;
- the Civil Code of the Russian Federation;
- the Tax Code of the Russian Federation;
- Federal Law No. 152-FZ dated 27 July 2006 "On Personal Data";
- Federal Law No. 402-FZ dated 6 December 2011 "On Accounting";
- other regulatory legal acts governing relations connected with the Operator's activities.

3.2. The legal basis for the processing of personal data also includes:

- the Charter of the Operator;
 - agreements concluded with personal data subjects;
 - consent of personal data subjects to the processing of their personal data.
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4. Scope, Categories and Conditions of Processed Personal Data and Categories of Personal Data Subjects in Relation to the Stated Purposes of Processing

4.1. The processing of personal data shall be limited to the achievement of specific, predetermined and lawful purposes. The processing of personal data incompatible with the purposes for which the personal data were collected shall not be permitted. Only personal data that correspond to the purposes of their processing shall be processed.

4.2. The content and scope of the personal data processed shall correspond to the purposes stated in this Section. The personal data processed shall not be excessive in relation to the stated purposes of processing.

The Operator processes personal data for the following purposes:

- preparation, conclusion and performance of agreements for the provision of SPA services, as well as arranging, confirming and supporting bookings under such agreements;
- ensuring safety and compliance with visitor rules;
- receiving and processing incoming inquiries and requests, including subsequent communication by telephone, email, messengers and chatbots;
- compiling statistics on Website visits;
- promoting goods, works and services on the market.

4.3. Processing of personal data for the purpose of preparing, concluding and performing agreements for SPA services, and arranging, confirming and supporting bookings

4.3.1. For the purposes specified in this Section, the Operator determines the categories and list of personal data processed, the categories of personal data subjects whose personal data are processed, the methods and periods of processing and storage, and the procedure for destroying personal data upon achievement of the processing purpose or occurrence of other lawful grounds.

4.3.2. For this purpose, the Operator processes personal data belonging to the following category of personal data subjects: the Operator's customers (visitors).

4.3.3. The Operator processes the following categories of personal data of customers (visitors):

a) General personal data include:

- surname, first name and patronymic;
- year of birth;
- month of birth;
- date of birth;

- email address;
- telephone number;
- payment information;
- access wristband number;
- time of entry/exit;
- surname, first name and patronymic of the child;
- details of the document confirming the child's age;
- confirmation of legal representative status;
- sex;
- bank card details;
- bank account number;
- details of documents confirming eligibility for benefits/discounts.

b) Special categories of personal data of customers (visitors) are not processed.

c) Biometric personal data of customers (visitors), i.e. information characterizing physiological and biological characteristics of an individual that can be used to establish their identity, are not processed.

4.3.4. The Operator carries out mixed processing of customers' (visitors') personal data for the purposes specified in this Section, without transmission via an internal network and with transmission via the Internet.

4.3.5. The actions performed by the Operator with customers' (visitors') personal data for the purposes specified in this Section include: collection, recording, systematization, accumulation, storage, clarification (updating and modification), retrieval, use, transfer (provision, access), blocking, deletion and destruction.

4.3.6. The processing of customers' (visitors') personal data does not require separate consent provided that the scope of the personal data processed by the Operator corresponds to the purpose of preparing, concluding and performing a civil-law agreement specified in this Section, pursuant to Clause 5, Part 1, Article 6 of Federal Law No. 152-FZ "On Personal Data".

4.3.7. In particular, the sending of service notifications and reminders regarding bookings for SPA services, as well as notifications concerning changes to the SPA operating schedule, shall be carried out without obtaining separate consent to the processing of personal data, as such processing is necessary for the performance of an

agreement to which the personal data subject is a party or for taking action at the request of the personal data subject prior to entering into an agreement.

4.3.8. Without the consent of the personal data subject, the Operator shall not disclose or disseminate customers' (visitors') personal data for the purpose specified in this Section, unless otherwise provided by the legislation of the Russian Federation.

4.3.9. Within the territory of the Russian Federation, the Operator may transfer customers' (visitors') personal data for the purpose specified in this Section to the following third parties, acting as processors that provide online booking and related software services to the Operator:

- Hotlabs LLC INN 9701099509, address: 6/1, bldg. 1, premises 102, Gorokhovskiy Lane, Moscow, 105064, Russia;
- H & S LLC, INN 7729784081, address: 29 Serebryanicheskaya Embankment, 6th Floor, Premises I, Moscow, 109028, Russia.

4.3.10. The Operator does not carry out cross-border transfers of customers' (visitors') personal data for the purpose specified in this Section.

4.3.11. The processing and storage period for customers' (visitors') personal data for the purpose specified in this Section shall be the term of the agreement and five (5) years after termination of the agreement.

4.4. Processing of personal data for the purposes of ensuring safety and compliance with visitor rules

4.4.1. For the purposes specified in this Section, the Operator processes personal data for ensuring the safety of visitors and personnel, controlling access to the SPA premises, preventing unlawful acts, protecting the life and health of individuals, and protecting the Operator's property, including through the use of video surveillance systems.

4.4.2. For these purposes, the Operator processes personal data of its customers (visitors).

4.4.3. The following personal data are processed:

a) General personal data include:

- information concerning passage through turnstiles (time and wristband);
- video surveillance footage used for security purposes only, without biometric identification of individuals;
- date and time of video recording;

- information concerning the person's location on the Operator's premises;
- information concerning violations of rules;
- information concerning removal from the Operator's premises.

b) Special categories of personal data of customers (visitors) are not processed.

c) Biometric personal data of customers (visitors), including images of the face used for the purpose of establishing identity, are not processed. Video surveillance is used solely for security and safety monitoring and does not involve automated identification, recognition or comparison of individuals' faces.

4.4.4. The Operator carries out mixed processing of personal data for the purposes specified in this Section, without transmission via an internal network and with transmission via the Internet.

4.4.5. The actions performed with personal data include collection, recording, systematization, accumulation, storage, clarification (updating and modification), retrieval, use, transfer (provision, access), blocking, deletion and destruction.

4.4.6. Processing of customers' (visitors') personal data does not require separate consent provided that the scope of the personal data processed corresponds to the purpose of ensuring safety and compliance with visitor rules specified in this Section, pursuant to Clause 7, Part 1, Article 6 of Federal Law No. 152-FZ "On Personal Data".

4.4.7. Without the consent of the personal data subject, the Operator shall not disclose or disseminate customers' (visitors') personal data for the purpose specified in this Section, unless otherwise provided by the legislation of the Russian Federation.

4.4.8. The Operator does not carry out cross-border transfers of customers' (visitors') personal data for the purpose specified in this Section.

4.4.9. Personal data shall be processed and stored until the purpose of processing specified in this Section has been achieved.

4.5. Processing of personal data for receiving and processing incoming inquiries and requests

4.5.1. The Operator processes personal data for receiving and processing incoming inquiries and requests, including subsequent communication by telephone, email, messengers and chatbots.

4.5.2. The categories of personal data subjects include:

- Website visitors;
- customers of the Operator.

4.5.3. The following personal data are processed:

a) General personal data include:

- surname, first name and patronymic;
- email address;
- telephone number;
- content of the "Comment" field;
- an individual's voice data.

b) Special categories of personal data are not processed.

c) Biometric personal data are not processed.

4.5.4. The Operator carries out mixed processing of personal data for the purpose specified in this Section, without transmission via an internal network and with transmission via the Internet.

4.5.5. The actions performed with personal data include collection, recording, systematization, accumulation, storage, clarification (updating and modification), retrieval, use, transfer (provision, access), blocking, deletion and destruction.

4.5.6. The Operator receives and processes inquiries through the following communication channels: telephone calls; email; the feedback form on the official Website; messages sent through messengers (Telegram, Max, VKontakte); the "Hot Bot" online booking service; and personal visits to the SPA complex.

4.5.7. The processing of personal data for the purpose specified in this Section is carried out subject to the prior consent of the personal data subject.

4.5.8. Without the consent of the personal data subject, the Operator shall not disclose or disseminate visitors' or customers' personal data for the purpose specified in this Section, unless otherwise provided by the legislation of the Russian Federation.

4.5.9. Within the territory of the Russian Federation, with respect to the purpose specified in this Section, the Operator may transfer personal data to the following third parties, acting as processors that provide online booking and related software services to the Operator:

- Hotlabs LLC, INN 9701099509, address: 6/1, bldg. 1, premises 102, Gorokhovskiy Lane, Moscow, 105064, Russia;

- H & S LLC, INN 7729784081, address: 29 Serebryanicheskaya Embankment, 6th Floor, Premises I, Moscow, 109028, Russia.

4.5.10. The Operator does not carry out cross-border transfers of visitors' or customers' personal data for the purpose specified in this Section.

4.5.11. Personal data shall be processed until the inquiry or request has been fully processed and a response has been provided, and for one (1) year after its closure.

4.6. Processing of personal data for Website traffic statistics

4.6.1. For the purpose of compiling statistics on Website visits, the Operator determines the categories and list of personal data processed, the categories of personal data subjects, the methods and periods of processing and storage, and the procedure for destroying personal data upon achievement of the processing purpose or occurrence of other lawful grounds.

4.6.2. The relevant category of personal data subjects is:

- Website visitors.

4.6.3. The Operator processes the following personal data:

a) General personal data:

- information collected through web analytics tools.

b) Special categories of personal data are not processed.

c) Biometric personal data are not processed.

4.6.4. The Operator carries out mixed processing of visitors' personal data for the purpose specified in this Section, without transmission via an internal network and with transmission via the Internet.

4.6.5. The actions performed with personal data include collection, recording, systematization, accumulation, storage, clarification (updating and modification), retrieval, use, transfer (provision, access), blocking, deletion and destruction.

4.6.6. Processing of visitors' personal data for the purpose specified in this Section is carried out subject to prior consent.

4.6.7. Without the consent of the personal data subject, the Operator shall not disclose or disseminate visitors' personal data for the purpose specified in this Section, unless otherwise provided by the legislation of the Russian Federation.

4.6.8. With the visitors' consent, the Operator may transfer their personal data within the Russian Federation for the purpose specified in this Section to Yandex LLC, INN 7736207543, address: 16 Lev Tolstoy Street, Moscow, 119021, Russia, which provides web analytics services to the Operator.

4.6.9. Consent provided by visitors shall be specific, informed, conscious and unambiguous and shall contain information allowing the purposes and methods of processing, the actions performed with personal data and the scope of personal data processed to be clearly determined.

4.6.10. The Operator does not carry out cross-border transfers of visitors' personal data for the purpose specified in this Section.

4.6.11. Visitors' personal data shall be processed for the period necessary to compile and analyze Website traffic statistics, but for no longer than three (3) years from the date of the relevant personal data subject's last visit to the Website.

4.7. Processing of personal data for the purposes of promoting goods, works and services on the market

4.7.1. For the purpose of promoting goods, works and services on the market, the Operator determines the categories and list of personal data processed, the categories of personal data subjects, the methods and periods of processing and storage, and the procedure for destroying personal data upon achievement of the processing purpose or occurrence of other lawful grounds.

4.7.2. The relevant categories of personal data subjects are:

- Website visitors;
- customers of the Operator.

4.7.3. The Operator processes the following personal data:

a) General personal data include:

- surname, first name and patronymic;
- email address;
- telephone number;
- cookies;
- advertising identifiers;
- information collected through web analytics tools.

b) Special categories of personal data are not processed.

c) Biometric personal data are not processed.

4.7.4. The Operator carries out mixed processing of visitors' and customers' personal data for the purpose specified in this Section, without transmission via an internal network and with transmission via the Internet.

4.7.5. The actions performed with personal data include collection, recording, systematization, accumulation, storage, clarification (updating and modification), retrieval, use, transfer (provision, access), blocking, deletion and destruction.

4.7.6. The Operator carries out the following marketing activities: use of targeted advertising tools in the VK Advertising and Yandex Advertising systems; use of retargeting technologies; use of web analytics tools, including cookies and advertising identifiers, to analyze user behavior on the Website and optimize advertising campaigns; and sending informational and advertising communications by email. Processing of visitors' and customers' personal data for the purpose specified in this Section is carried out subject to prior consent.

4.7.7. Without the consent of the personal data subject, the Operator shall not disclose or disseminate visitors' or customers' personal data for the purpose specified in this Section, unless otherwise provided by the legislation of the Russian Federation.

4.7.8. With the consent of visitors and customers, the Operator may transfer their personal data within the Russian Federation for the purpose specified in this Section to the following third parties:

- Yandex LLC, INN 7736207543, address: 16 Lev Tolstoy Street, Moscow, 119021, Russia, which provides targeted advertising and web analytics services;
- VK LLC, INN 7743001840, address: 39, bldg. 79 Leningradsky Prospekt, Moscow, 125167, Russia, which provides targeted advertising services.

4.7.9. Consent provided by visitors and customers shall be specific, informed, conscious and unambiguous and shall contain information allowing the purposes and methods of processing, the actions performed with personal data and the scope of personal data processed to be clearly determined.

4.7.10. The Operator does not carry out cross-border transfers of visitors' or customers' personal data for the purpose specified in this Section.

4.7.11. Personal data shall be processed and stored until the purpose of processing specified in this Section has been achieved or until the personal data subject withdraws their consent.

5. Processing of Personal Data of Website Visitors Using Cookies

5.1. Cookies transmitted to the technical devices of personal data subjects may be used to provide personalized Website functions, deliver personalized advertising, conduct statistical and research activities, and improve the operation of the Website.

5.2. The personal data subject acknowledges that the equipment and software used to access websites on the Internet may have functions that prohibit the use of cookies, either for all websites or for specific websites, as well as functions that allow previously received cookies to be deleted.

5.3. The Operator may establish that certain Website functions are available only if the personal data subject permits the acceptance and receipt of cookies.

5.4. The structure, content and technical parameters of cookies are determined by the Operator and may be changed without prior notice to the personal data subject.

5.5. Counters installed on the Website or in the Website application may be used to analyze cookies, collect and process statistical information concerning the use of the Website, and ensure the operation of the Website as a whole or of its individual functions. The technical parameters of the counters are determined by the Operator and may be changed without prior notice to personal data subjects.

5.6. The Operator uses the Yandex.Metrica software, whose functionality makes it possible to identify unique Website visitors and compile information about their preferences and behavior on the Website.

6. Collection and Storage of Personal Data

6.1. When collecting personal data, including through information and telecommunications networks, the Operator ensures the recording, systematization, accumulation, storage, clarification (updating and modification) and retrieval of personal data of citizens of the Russian Federation using databases located within the territory of the Russian Federation.

6.2. Persons who provide the Operator with information concerning another personal data subject, including through the Website, without obtaining the consent of the personal data subject whose personal data have been provided, shall be liable in accordance with the legislation of the Russian Federation.

6.3. The Operator stores personal data in a form allowing identification of the personal data subject for no longer than required by the purposes of processing, unless the storage period is established by federal law or by an agreement to which the personal data subject is a party, beneficiary or guarantor.

6.4. The Operator strictly adheres to the principles of data minimization and limitations on data processing periods. Processed personal data shall be destroyed in the event of:

- achievement of the purposes of processing personal data;
- withdrawal of consent to the processing of personal data or expiration of the consent period;
- loss of the need to achieve the purposes of processing;
- exclusion of the Operator from the Unified State Register of Legal Entities.

After the expiry of the above periods, the Operator may continue processing personal data where such processing is necessary to comply with the legislation of the Russian Federation.

7. Protection of Personal Data

7.1. The Operator takes the necessary legal, organizational and technical measures to ensure the security and confidentiality of personal data in accordance with the requirements of the legislation of the Russian Federation, including:

- developing and implementing organizational and administrative documents and other documents concerning the processing and protection of personal data;
- conducting employee briefings and training on the processing of personal data and measures for their protection;
- ensuring the physical security of premises and locations where personal data are stored;
- appointing persons responsible for organizing the processing and ensuring the security of personal data;
- identifying threats to the security of personal data when processing them in personal data information systems;

- assessing potential harm that may be caused to personal data subjects in the event of a violation of Federal Law No. 152-FZ "On Personal Data";
 - using information security measures that have undergone the prescribed conformity assessment procedure;
 - restricting access to premises where technical means used for processing personal data and storage media are located;
 - detecting and investigating incidents of unauthorized access to personal data, including implementing measures to detect, prevent and eliminate the consequences of cyberattacks on personal data information systems and responding to computer incidents;
 - notifying Roskomnadzor of personal data breaches in accordance with the procedure established by Federal Law No. 152-FZ "On Personal Data";
 - notifying personal data subjects of personal data breaches where such breaches may cause harm to the subjects, in accordance with the procedure established by Article 21 of Federal Law No. 152-FZ "On Personal Data";
 - restoring personal data that have been modified or destroyed as a result of unauthorized access;
 - establishing rules governing access to personal data;
 - maintaining records of persons authorized to process personal data;
 - maintaining records of physical media containing personal data;
 - monitoring the measures taken to ensure the security of personal data and the level of protection of personal data information systems;
 - applying other legal, organizational and technical measures to ensure the security of personal data.
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8. Responses to Requests from Personal Data Subjects

8.1. Confirmation of the fact that the Operator processes personal data, the legal grounds and purposes of such processing, as well as other information specified in Part 7 of Article 14 of Federal Law No. 152-FZ "On Personal Data", shall be provided by the Operator to the personal data subject or their representative upon an inquiry or receipt of a request within ten (10) business days from the date of receipt of the inquiry or request.

This period may be extended by no more than five (5) business days if the Operator sends the personal data subject a reasoned notice specifying the reasons for extending the period for providing the requested information.

The Operator shall provide such information to the personal data subject or their representative free of charge and in the form in which the relevant inquiry or request was submitted, unless otherwise specified in the inquiry or request.

8.2. A request shall contain:

- the number of the principal identity document of the personal data subject or their representative, information concerning the date of issue of such document and the issuing authority;
- information confirming the personal data subject's involvement in a relationship with the Operator (agreement number, agreement date, username or other identifier, and/or other information), or other information confirming that the Operator processes the personal data;
- the signature of the personal data subject or their representative.

8.3. A request may be submitted as an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

8.4. If an inquiry or request from a personal data subject does not contain all information required under Federal Law No. 152-FZ "On Personal Data", or if the personal data subject does not have the right to access the requested information, the Operator shall provide a reasoned refusal.

8.5. The personal data subject's right to access their personal data may be restricted pursuant to Part 8 of Article 14 of Federal Law No. 152-FZ "On Personal Data", including where access by the personal data subject to their personal data would violate the rights and legitimate interests of third parties.

9. Updating, Correction, Deletion and Destruction of Personal Data

9.1. If inaccurate personal data are identified following an inquiry from a personal data subject or their representative, or upon their request or a request from Roskomnadzor, the Operator shall block the personal data relating to such personal data subject from the moment of receiving the inquiry or request for the period of verification, provided that such blocking does not violate the rights and legitimate interests of the personal data subject or third parties.

9.2. If the inaccuracy of personal data is confirmed, the Operator shall, based on information provided by the personal data subject or their representative, Roskomnadzor, or other necessary documents, clarify the personal data within seven (7) business days from the date such information is provided and lift the blocking.

9.3. Personal data shall be destroyed by the Operator in the following cases:

- achievement of the purposes of processing personal data;
- withdrawal by the personal data subject of their consent to the processing of their personal data;
- receipt of information that the personal data were obtained unlawfully or are unnecessary for the stated purpose of processing;
- identification of unlawful processing of personal data.

9.4. Upon achievement of the purpose of processing personal data, the Operator shall terminate the processing of personal data or ensure its termination, where the processing is carried out by another person acting on behalf of the Operator, and destroy the personal data or ensure their destruction where the processing is carried out by another person acting on behalf of the Operator, within a period not exceeding thirty (30) days from the date on which the purpose of processing was achieved, unless otherwise provided by an agreement to which the personal data subject is a party, beneficiary or guarantor, another agreement between the Operator and the personal data subject, or where the Operator is entitled to continue processing the personal data without the consent of the personal data subject.

9.5. If a personal data subject withdraws their consent to the processing of personal data, the Operator shall terminate the processing of such personal data or ensure its termination, where the processing is carried out by another person acting on behalf of the Operator, and, if retention of the personal data is no longer necessary for the purposes of processing, destroy the personal data or ensure their destruction within a period not exceeding thirty (30) days from the date of receipt of the withdrawal, unless otherwise provided by an agreement to which the personal data subject is a party, beneficiary or guarantor, another agreement between the Operator and the personal data subject, or where the Operator is entitled to continue processing the personal data without the consent of the personal data subject.

9.6. If a personal data subject states and/or provides information confirming that their personal data were obtained unlawfully or are unnecessary for the stated purpose of

processing, the Operator shall destroy such personal data within a period not exceeding seven (7) business days from the date of receipt of the relevant information.

9.7. If unlawful processing of personal data by the Operator or a person acting on behalf of the Operator is identified and the lawfulness of such processing cannot be ensured, the Operator shall destroy such personal data or ensure their destruction within a period not exceeding ten (10) business days from the date on which the unlawful processing was identified.

The Operator shall notify the personal data subject or their representative of the destruction of the personal data and, where the inquiry or request of the personal data subject or their representative, or the request of an authorized body for the protection of the rights of personal data subjects, was submitted by such authorized body, shall also notify the relevant authorized body.

10. Final Provisions

10.1. In accordance with the requirements of Part 2 of Article 18.1 of Federal Law No. 152-FZ "On Personal Data", this Policy is made available at the Operator's registered address and is freely accessible on the Internet on the Website.