

## Privacy Policy

1.1. This document sets forth the Privacy Policy ("Policy") of the Foundation for Assistance for Internet Technologies and Infrastructure Development ("Organization") in accordance with the requirements of Article 18.1 of the Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006.

1.2. This Policy uses the following general definitions:

**personal data** shall mean any information directly or indirectly related to an identified or identifiable natural person (personal data subject);

**processing of personal data** shall mean any operation or set of operations which is performed upon personal data, whether or not by automatic means, such as collection, recording, organization, storage, rectification (updating/amending), retrieval, use, disclosure by transmission, dissemination or otherwise making available, depersonalization, blocking, erasure, or destruction;

**automated processing of personal data** shall mean processing of personal data using computer equipment;

**dissemination of personal data** shall mean actions aimed at disclosure of personal data to an indefinite number of people;

**transmission of personal data** shall mean actions aimed at disclosure of personal data to an identified or identifiable number of people;

**blocking of personal data** shall mean temporary cessation of personal data processing (except when processing is required for rectification of personal data);

**destruction of personal data** shall mean actions that make it impossible to restore the content of personal data in the personal data information system and/or resulting in the destruction of physical media containing personal data;

**depersonalization of personal data** shall mean actions that make it impossible to link personal data to any specific subject of personal data without using additional information;

**personal data information system** shall mean all personal data stored in databases and all information technology and technical means ensuring the processing of such personal data.

**subject of personal data** shall mean any natural person to whom such personal data are directly or indirectly related.

2. Principles of personal data processing in Organization:

2.1. Personal data shall be processed fairly and lawfully;

2.2. Personal data processing shall be limited by specified, explicit, and legitimate purposes. Personal data shall not be processed in a way incompatible with those purposes;

2.3. Databases containing personal data being processed for incompatible purposes shall not be merged;

2.4. Only personal data adequate to the purposes of such personal data processing shall be processed;

2.5. Content and volume of personal data being processed shall be relevant and not excessive in relation to the purposes for which they are processed;

2.6. Processed personal data shall be accurate, complete, and, where necessary, up-to-date with regard to the purposes for which they are processed. Every reasonable step shall be taken to ensure that inaccurate or incomplete data are erased or rectified;

2.7. Personal data shall be kept in a form which permits identification of personal data subjects for no longer than is necessary for the purposes for which such data are processed unless the personal data storage period is established by federal law or by a contract to which the personal data subject is a party, beneficiary, or guarantor. Unless otherwise stipulated by federal

laws, personal data shall be destroyed or depersonalized once the goals are achieved or when such goals cease to be relevant.

2.8. Any collection of personal data of Russian citizens, including over the Internet, shall ensure its recording, organization, storage, rectification (updating/amending), or retrieval through the use of databases located in the Russian Federation.

### 3. Legal basis for personal data processing:

Personal data processing in Organization shall be carried out in accordance with the Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006, Article 53 of the Federal Law No. 126-FZ "On Communications" dated July 7, 2003, the Labor Code of the Russian Federation, Regulation of the Government of the Russian Federation No. 1119 "On approval of the requirements to personal data protection during the processing in personal data information systems" dated November 1, 2012, Regulation of the Government of the Russian Federation No. 687 "On approval of the statute on special aspects of personal data processing without the use of means of automation" dated September 15, 2008, and other regulatory documents for personal data protection.

### 4. The purposes of personal data processing:

4.1. Organization shall collect, store, and process exclusively personal data required for service provision, operation, and protection of rights and legal interests of third parties, provided that the rights of the personal data subjects are not infringed.

4.2. Personal data of a personal data subject may be processed for the following purposes:

4.2.1. To identify the personal data subject;

4.2.2. To ensure domain name registration and maintenance;

4.2.3. To contact the personal data subject if necessary, including for sending notifications, requests, and information related to service delivery, and to process requests and applications from personal data subjects;

4.2.4. To conduct statistical and other research based on anonymized data.

4.3. Organization shall not process biometric data and special categories of personal data related to race and nationality, political views, religious beliefs, and health.

### 5. Personal data shall include:

5.1. Personal data of a personal data subject employed by Organization are required by it for registering, changing, or terminating labor relations.

5.2. Personal data of a personal data subject that is Organization's customer are required by Organization to perform its obligations under contractual relationship with the personal data subject and to comply with the Russian laws on personal data protection.

### 6. Personal data processing:

6.1. Personal data of Organization's personal data subjects shall be processed for the purpose of complying with the laws and other regulatory documents of the Russian Federation, training personal data subjects who are Organization's employees, ensuring personal safety of personal data subjects, controlling the scope and quality of work, and safekeeping of Organization's property.

6.2. Processing of personal data shall be carried out by Organization based on consent of the personal data subject, regardless of the use of automation means.

6.3. Organization shall not disclose information containing personal data of personal data subjects to third parties without a written consent of personal data subjects, except when it is required for the protection of life and health or in cases stipulated by the laws of the Russian Federation on personal data protection.

6.4. Based on a substantiated request from the authorized bodies and solely for compliance with the applicable laws, the subject's personal data may be transferred without its consent:

- to the court for administration of justice;
- to the Federal Security Service;

- to the prosecution authorities;
- to the police;
- to other authorities and organizations in accordance with mandatory regulatory documents.

6.5. Where consent to the processing of personal data is received from a representative of the personal data subject, the authority of the said representative for giving consent on behalf of the personal data subject shall be verified by Organization.

6.6. In the event that the personal data subject withdraws its consent to the processing of personal data, Organization shall have the right to continue the processing of personal data without the consent of the personal data subject in the event of any circumstances set out in applicable laws.

6.7. Legal regulation of the procedure and timeframe for storing documents containing personal data of personal data subjects shall be performed on the basis of the "List of standard archived managerial documents produced by state authorities, municipal bodies, and organizations, with the storage period" approved by the Order No. 558 of the Ministry of Culture of the Russian Federation dated August 25, 2010.

6.8. Documents containing personal data may be destroyed using any means that prevent unauthorized persons from accessing such materials and render it impossible to recover such documents.

## 7. Confidentiality of personal data

7.1. Personal data received in connection with the existence of an employer-employee relationship and for service delivery by Organization shall be deemed confidential information and protected by applicable laws.

7.2. Persons with access to personal data have undertaken the non-disclosure obligation in respect of confidential information and have been warned about potential disciplinary, administrative, civil, and criminal liability for violating the requirements of the applicable laws of the Russian Federation on personal data protection.

7.3. Persons with access to personal data shall not disclose personal data of personal data subjects to third parties without a written consent of personal data subjects, except when it is required for the protection of life and health or in cases stipulated by the laws of the Russian Federation.

7.4. Persons with access to personal data shall not disclose personal data for commercial purposes without a written consent of personal data subjects. Processing of personal data of personal data subjects for the purpose of promoting products or services by direct contact with a potential consumer through means of communication shall only be permitted based on the prior consent of the personal data subject.

8. Measures aimed at ensuring Organization's compliance with the requirements set forth in Articles 18.1. and 19 of the Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006:

8.1. Organization has appointed a person overseeing the organization of personal data processing in Organization.

8.2. Organization's head has approved the policies establishing procedures aimed at the detection and prevention of violations of the laws of the Russian Federation on personal data and specifying for each purpose of personal data processing the type of processed personal data, categories of subjects whose personal data are to be processed, timeframe for data processing and storage, and the destruction procedure once the goals have been achieved or in the event of the existence of other legal grounds.

8.3. In accordance with applicable regulatory documents, Organization shall implement legal, organizational, and technical measures to ensure the security of personal data processed in Organization's personal data information systems.

8.4. When processing personal data without the use of means of automation, Organization shall follow the requirements of the Regulation of the government of the Russian Federation No.

687 "On approval of the statute on special aspects of personal data processing without the use of means of automation" dated September 15, 2008.

8.5. For the purpose of exercising internal control over the compliance with the Russian laws on personal data processing, Organization shall have recurrent inspections of the conditions of personal data processing.

8.6. Organization's employees directly involved in the processing of personal data shall be made aware of the provisions of the laws of the Russian Federation on personal data, including requirements related to the protection of personal data, as well as with documents setting out Organization's policies in relation to personal data processing.

8.7. Organization shall be held liable for breaching its obligations on ensuring protection and confidentiality of personal data under the laws of the Russian Federation.

8.8. To provide unlimited access to Organization's Policy on processing of personal data and to information concerning implemented measures with respect to the protection of personal data, this Policy is published on the official website of Organization (<http://en.faitid.org>).