

PERSONAL DATA PROCESSING POLICY

1.GENERAL PROVISIONS

- 1.1.This Personal Data Processing Policy (hereinafter - the Policy) defines the basic principles, purposes, conditions and methods of personal data processing of the Individual Entrepreneur Sergey Anatolievich Tarasenko (OGRNIP 322665800063523, TIN 665914136417, registration address: 620105, Sverdlovsk region, Ekaterinburg, Khrustalnogorskaya street 88, 111) (hereinafter referred to as the Operator).
- 1.2.This Policy has been developed in order to fulfill the requirements of paragraph 2, part 1, article 18.1 of the Federal Law dated 27.07.2006 No. 152-FZ "On Personal Data" (hereinafter - the Personal Data Law), taking into account the requirements of the Personal Data Law and other regulatory legal acts of the Russian Federation in the field of personal data.
- 1.3.This Policy applies to all operations performed by the Operator with personal data with or without the use of automation tools. The Operator processes the personal data of the subject of personal data only if they are filled in and (or) sent by the subject of personal data independently through forms on the website at <https://startranslate.ru/> (including all its subdomains) (hereinafter - the Website), or sent to the Operator by e-mail to order@startranslate.ru. By filling in the relevant forms and (or) sending his/her personal data to the Operator, the subject of personal data expresses his/her consent to this Policy.
- 1.4.The subject of personal data independently decides whether to provide his/her personal data and gives consent freely, of his/her own free will and in his/her own interest.
- 1.5.This Policy is subject to updating at the initiative of the Operator, as well as in case of changes in the legislation of the Russian Federation on personal data.
- 1.6.The current version of this Policy is available at all times on the Website at https://startranslate.ru/files/privatepolicy_en.pdf.

2.BASIC CONCEPTS

- 2.1.For the purposes of this Policy, the following terms are used with the following meaning:

Personal data - any information relating directly or indirectly to a certain or definable natural person (subject of personal data).

Biometric personal data - information that characterizes physiological and biological features of a person, on the basis of which it is possible to establish his/her identity.

Processing of personal data - any action (operation) or set of actions (operations) performed with or without the use of automation means with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion,

destruction of personal data.

Automated processing of personal data - processing of personal data with the help of computing equipment.

Dissemination of personal data - actions aimed at disclosure of personal data to an indefinite number of persons.

Provision of personal data - actions aimed at disclosure of personal data to a certain person or a certain group of persons.

Blocking of personal data - temporary cessation of personal data processing (except for cases when processing is necessary to clarify personal data).

Destruction of personal data - actions as a result of which it becomes impossible to restore the content of personal data in the information system of personal data and (or) as a result of which material carriers of personal data are destroyed.

Personal data depersonalization - actions, as a result of which it becomes impossible to determine the belonging of personal data to a particular subject of personal data without using additional information.

Personal data subject, subject is a natural person who can be directly or indirectly identified through personal data.

Consent to personal data processing, Consent is a written or digital document that confirms the Subject's voluntary decision to transfer personal data to the Operator in the amount, on the terms and for the purposes defined by this Policy and the agreements concluded between the Subject and the Operator.

3.PRINCIPLES AND PURPOSES OF PERSONAL DATA PROCESSING

3.1.Processing of personal data by the Operator is carried out taking into account the need to ensure the protection of the rights and freedoms of personal data subjects, including the protection of the right to privacy, personal and family secrecy, based on the following principles:

- processing of personal data is carried out on a lawful basis;
- the processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes;
- processing of personal data incompatible with the purposes of personal data collection is not allowed;
- the content and scope of processed personal data correspond to the stated purposes of processing. The redundancy of processed personal data in relation to the stated purposes of their processing is not allowed;
- when processing personal data, the accuracy of personal data, their sufficiency and, where necessary, relevance to the purposes of personal data processing are ensured;
- storage of personal data is carried out in a form that allows to identify the subject of personal data, not longer than required by the purposes of personal data processing, unless the

period of storage of personal data is established by federal law, contract to which the subject of personal data is a party, beneficiary or guarantor;

- processed personal data shall be destroyed or anonymized when the purposes of processing have been achieved or when it is no longer necessary to achieve these purposes, unless otherwise provided for by federal law.

3.2. Processing of personal data by the Operator is carried out for the following purposes:

- identification of the Subject for the purpose of entering into any contracts with the Operator and their further execution;
- conducting by the Operator of promotions, surveys, interviews, testing and research on the Website;
- establishing feedback with the Subject, including, but not limited to: sending mailings, sms notifications, emails, verbal and written inquiries, processing requests and applications from the Subject;
- confirmation of the accuracy and completeness of the personal data provided by the Subject;
- statistical and other research and (or) analytical purposes, provided that the Subject's personal data are anonymized.

4. SCOPE AND CATEGORIES OF PROCESSED PERSONAL DATA, CATEGORIES OF PERSONAL DATA SUBJECTS

4.1. The Operator may process personal data of the following Subjects:

- counterparties - individuals and representatives of counterparties - legal entities;
- site visitors

4.2. Personal data processed by the Operator includes:

- surname, first name, patronymic of the Personal Data Subject;
- residence/residence address or other address specified by the Subject when entering into contracts with the Operator;
- cell phone number;
- electronic mail (email) address;
- scanned copies of original documents (passport, education document, TIN certificate, pension certificate, labor book, medical certificate and other documents sent by the Subject to receive services from the Operator);
- history of requests and views on the Website and its services;
- cookies, information about the user's location, information about the user's activities on the

Website, information about the user's equipment, date and time of the session.

4.3. The Operator ensures that the content and scope of processed personal data corresponds to the stated processing purposes and, if necessary, takes measures to eliminate their redundancy in relation to the stated processing purposes.

5. PROCEDURE AND CONDITIONS OF PERSONAL DATA PROCESSING

5.1. The Operator shall process personal data in the following ways:

- non-automated processing of personal data;
- automated processing of personal data with or without transmission of the received information via information and telecommunication networks, including processing by means of automated database management systems and other software;
- mixed processing of personal data.

5.2. List of actions performed by the Operator with personal data: collection, systematization, accumulation, storage, clarification (update, change), use, distribution (including transfer), depersonalization, blocking, destruction on the territory of the Russian Federation in accordance with the current legislation of the Russian Federation.

5.3. The personal data subject decides to provide his/her personal data and gives Consent freely, of his/her own free will and in his/her own interest.

5.4. The Operator does not process biometric personal data.

5.5. The Operator does not process special categories of personal data concerning race, nationality, political opinions, religious or philosophical beliefs, intimate life.

5.6. The condition for termination of personal data processing may be the achievement of the purposes of personal data processing, expiration of the Consent or revocation of the Consent by the Personal Data Subject, as well as detection of unlawful processing of personal data.

5.7. The period of personal data processing is unlimited. The data subject may withdraw his/her Consent to the processing of personal data at any time by sending a notice to the Operator by e-mail to the Operator's e-mail address specified in Section 9 of this Policy, marked "Withdrawal of consent to the processing of personal data".

5.8. The Operator undertakes to stop processing of the Subject's personal data within five (5) business days from the date of receipt of the notice in accordance with clause 5.8 of this Policy.

6. BASIC RIGHTS AND OBLIGATIONS

6.1. The operator shall have the right to:

- 6.1.1. receive from the Subject reliable information and (or) documents containing personal data;

6.1.2. require the Personal Data Subject to timely clarify the provided personal data.

6.2.The operator is obligated to:

6.2.1. process personal data in accordance with the procedure established by the applicable laws of the Russian Federation;

6.2.2. consider appeals of the Personal Data Subject (his/her legal representative) on personal data processing issues and to give reasoned answers;

6.2.3. provide the Personal Data Subject (his/her legal representative) with the possibility of free access to his/her personal data free of charge;

6.2.4. take measures to clarify, destroy personal data of the subject of personal data in connection with his (his legal representative's) application with legitimate and justified demands;

6.2.5. organize protection of personal data in accordance with the requirements of the legislation of the Russian Federation.

6.3.Personal data subjects have the right to:

6.3.1. receive full information about their personal data processed by the Operator;

6.3.2. access to their personal data, including the right to receive a copy of any record containing their personal data, except as provided for by federal law;

6.3.3. clarify their personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;

6.3.4. revoke the Consent to the processing of personal data;

6.3.5. take the measures provided for by law to protect their rights;

6.3.6. exercise other rights provided for by the legislation of the Russian Federation.

6.4.Personal data subjects are obliged to:

6.4.1. provide the Operator with true data about himself/herself;

6.4.2. provide documents containing personal data to the extent necessary for the purpose of processing;

6.4.3. to inform the Operator about the clarification (update, change) of his/her personal data.

6.5.Persons who have passed to the Operator false information about themselves or information about another Personal Data Subject without the consent of the latter shall be held liable in accordance with the legislation of the Russian Federation.

7.DISPUTE RESOLUTION PROCEDURE

- 7.1.All disputes and disagreements that may arise between the Operator and the Subjects on the issues that have not been resolved in the text of the Policy shall be resolved through negotiations.
- 7.2.The Parties are obliged to observe the claim procedure of dispute resolution. Prior to filing a claim with the court on disputes arising out of relations between the Subject and the Operator, a claim (a written proposal for voluntary dispute settlement) shall be submitted. The term of claim consideration is thirty (30) calendar days from the date of receipt of the claim, unless another pre-trial settlement procedure is established by the current legislation of the Russian Federation.
- 7.3.In case of failure to settle disputes in the course of negotiations, disputes arising from the Policy shall be settled in a court of general jurisdiction at the location of the Operator. The current legislation of the Russian Federation shall apply to this Policy and relations between the Subject and the Operator.

8.FINAL PROVISIONS

- 8.1.The Operator has the right to make changes to this Policy. When making changes to the current edition, the date of the last update shall be indicated. The new edition of the Policy comes into force from the moment of its posting on the Website at: <https://startranslate.ru/files/privatepolicy.pdf>, unless otherwise provided by the new edition of the Policy. The current version is permanently available on the Website.
- 8.2.This Policy approves the form of the Consent to the processing of personal data of the Website users (Annex No. 1 to this Policy), which is publicly available on the Website at the following link: https://startranslate.ru/files/sogl_pers_en.pdf.

9.OPERATOR DETAILS

Individual entrepreneur Sergey Anatolyevich Tarasenko

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CONSENT FORM FOR PROCESSING PERSONAL DATA FOR WEBSITE VISITORS

By remaining on the website <https://startranslate.ru/> (hereinafter - the Website), as well as on any of its subdomains, I express my consent to the individual entrepreneur Tarasenko Sergey Anatolievich, OGRNIP 322665800063523, TIN 665914136417, registered at the address: 620105, Sverdlovsk region, Ekaterinburg, Khrustalnogorskaya street 88, 111 (hereinafter - the Operator), for automated processing of my personal data (cookie files, information about the user's location, information about the user's actions on the site, information about the user's equipment, date and time of the session), including with the use of programs for automatic collection of analytical data, with the following actions: collection, recording, systematization, accumulation, storage, storage, clarification (update, change), retrieval, use, disclosure, processing of personal data (including the use of software for automatic collection of analytical data).

Processing of personal data is carried out for the purposes of:

- ensuring and improving the functioning of the Website.
- ensuring the possibility to provide services declared on the Website or requested by the Subject through various communication channels.

This Consent is valid from the moment of its provision and during the period of my use of the Website. In case of refusal to process personal data by the programs specified in this Consent, I am informed of the need to stop using the Website or disable cookies in my browser settings.