

THE POLICY OF CFN LLC REGARDING PROCESSING PERSONAL DATA

1. General provisions

The Personal Data Processing Policy (hereinafter referred to as the Policy) has been developed in accordance with Federal Law No. 152-FL dated 27.07.2006 "On Personal Data" (hereinafter referred to as FL-152).

This Policy defines the procedure for processing personal data and measures to ensure the security of personal data at CFN LLC (legal address: 108834, Moscow, Kommunarka settlement, Potapovskaya Roscha str., 18, Bldg 2, room 1P) represented by the Manager, individual entrepreneur Maria Igorevna Vershinina (hereinafter referred to as the Operator), in order to protect the rights and freedoms of a person and citizen when processing his personal data, including the protection of the rights to privacy, personal and family secrets.

The Policy is strictly enforced by managers and employees of all structural divisions and branches of the Operator.

The Policy applies to all personal data of subjects processed by the Operator using automation tools and without the use of such tools.

2. Legal grounds for processing personal data.

The Operator's personal data processing policy is determined in accordance with the following regulatory legal acts:

- Federal Law No. 152-FL of July 27, 2006 on Personal Data;
- The Labor Code of the Russian Federation;
- Decree of the Government of the Russian Federation dated 01.11.2012 No. 1119 "On Approval of Requirements for the protection of personal Data during their Processing in Personal Data Information Systems";
- Decree of the Government of the Russian Federation of September 15, 2008

No. 687 "On Approval of the Regulation on the specifics of Personal Data Processing carried out without the use of automation tools";

- By Order of the FSTEC of Russia No. 55, the FSS of Russia No. 86, the Ministry of Information and Communications of Russia No. 20 dated February 13, 2008 "On Approval of the Procedure for Classifying Personal Data Information Systems";
- other regulatory legal acts of the Russian Federation and regulatory documents of authorized state authorities.

3. Definitions

Personal data is any information related directly or indirectly to a specific or identifiable individual (citizen). That is, such information may include, in particular: full name, year, month, date and place of birth, address, information about family, social, property status, information about education, profession, income, health information, phone number, email address, and other information.

Operator is a state body, municipal body, legal entity, or individual who independently or jointly with other persons organizes and/or performs the processing of personal data, as well as determines the purposes of personal data processing, the composition of personal data to be processed, and actions (operations) performed with personal data.

Personal data processing is any action (operation) or set of actions (operations) with personal data performed using automation tools or without the use of such tools. Such actions (operations) include: collection, receipt, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

4. Principles of personal data processing

The processing of personal data by the Operator is based on the following principles:

- Legality and fair basis;
- restrictions on the processing of personal data to achieve specific, predetermined and legitimate goals;
- preventing the processing of personal data incompatible with the purposes of personal data collection;
- preventing the consolidation of databases containing personal data, the processing of which is carried out for purposes incompatible with each other;
- processing only those personal data that meet the purposes of their processing;
- compliance of the content and volume of personal data processed with the stated purposes of processing;
- preventing the processing of personal data that is excessive in relation to the stated purposes of their processing;
- ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of personal data processing;
- destruction or depersonalization of personal data upon achievement of the purposes of their processing or in case of loss of the need to achieve these goals, if it is impossible for the Operator to eliminate violations of personal data, unless otherwise provided by federal law.

5. Conditions of personal data processing

The operator processes personal data in the presence of at least one of the following conditions:

- the processing of personal data is carried out with the consent of the personal data subject to the processing of his personal data;

- the processing of personal data is necessary to achieve the goals stipulated by an international agreement of the Russian Federation or a law, to carry out and fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation;
- the processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another body or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;
- the processing of personal data is necessary for the performance of an agreement to which the personal data subject is a party or beneficiary or guarantor, as well as for the conclusion of an agreement on the initiative of the personal data subject or an agreement under which the personal data subject will be the beneficiary or guarantor;
- personal data processing is necessary to exercise the rights and legitimate interests of the operator or third parties, or to achieve socially significant goals, provided that the rights and freedoms of the personal data subject are not violated.;
- personal data is being processed, access to which is provided to an unlimited number of persons by the personal data subject or at his request (hereinafter referred to as publicly available personal data);
- personal data is being processed that is subject to publication or mandatory disclosure in accordance with federal law.

6. Confidentiality of personal data

The operator and other persons who have obtained access to personal data are obliged not to disclose or distribute personal data to third parties without the consent of the personal data subject, unless otherwise provided by federal law.

7. Publicly available sources of personal data

For information support purposes, the Operator may create publicly available sources of personal data of subjects, including directories and address books. With the written consent of the subject, publicly available sources of personal data may include his last name, first name, patronymic, date and place of birth, position, contact phone numbers, email address and other personal data provided by the subject of personal data.

Information about the subject must be excluded from publicly available sources of personal data at any time at the request of the subject or by decision of a court or other authorized state bodies.

8. Assignment of personal data processing to another person

The operator has the right to 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 a contract concluded with this person. The person who processes personal data on behalf of the Operator is

obliged to comply with the principles and rules of personal data processing provided for by Federal Law No. 152-FL.

9. Purposes of personal data processing

The processing of personal data by the Operator is carried out for the purposes of:

- conducting personnel work, regulating labor relations with the Operator's employees;
- performing duties on providing personal data to government authorities, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Compulsory Medical Insurance Fund, as well as other government agencies;
- preparation, conclusion, execution and termination of contracts with counterparties;
- execution of judicial acts, acts of other bodies or officials subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;
- exercising the rights and legitimate interests of the Operator within the framework of carrying out activities stipulated by the Charter and other local regulations of the Operator or third parties, or achieving socially significant goals;
- to ensure efficient and user-friendly operation of the Operator's websites cfn.su and pinkamena.com on which personal data is collected;
- for other legitimate purposes.

10. Subjects of personal data

The Operator processes the personal data of the following persons:

- subjects with whom civil law contracts have been concluded;
- Operator's clients;
- users registered on the Operator's websites cfn.su and pinkamena.com

11. List of personal data processed by the Operator

- The list of personal data processed by the Operator is determined in accordance with the legislation of the Russian Federation and local regulations of the Operator, taking into account the purposes of personal data processing specified in Section 9 of the Policy.
- The Operator does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, or intimate life.

12. Consent of the personal data subject to the processing of his personal data

The personal data subject decides on the provision of his personal data and agrees to their processing freely, voluntarily and in his own interest. Consent to the processing of personal data may be given by

the personal data subject or his representative in any form that allows to confirm the fact of its receipt, unless otherwise established by federal law.

13. Rights of the personal data subject

A personal data subject has the right to receive information from the Operator regarding the processing of his personal data, unless such right is restricted in accordance with federal laws. The personal data subject has the right to require the Operator to clarify his personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as to take legally prescribed measures to protect their rights.

The processing of personal data for the purpose of promoting goods, works, and services on the market through direct contact with a potential consumer via means of communication, as well as for political campaigning purposes, is permitted only with the prior consent of the personal data subject. The specified processing of personal data is considered to be carried out without the prior consent of the personal data subject, unless the Operator proves that such consent has been obtained.

The operator is obliged to immediately terminate, at the request of the personal data subject, the processing of his personal data for the above purposes.

It is prohibited to make decisions based solely on automated processing of personal data that give rise to legal consequences with respect to the personal data subject or otherwise affect his rights and legitimate interests, except in cases provided for by federal laws, or with the written consent of the personal data subject.

If the personal data subject believes that the Operator is processing his personal data in violation of the requirements of Federal Law No. 152- FL or otherwise violates his rights and freedoms, the personal data subject has the right to appeal the actions or omissions of the Operator to the Authorized Body for the Protection of the Rights of personal Data subjects or in court.

The subject of personal data has the right to protect his rights and legitimate interests, including compensation for damages and (or) compensation for moral damage in court.

14. Storage of personal data

Personal data storage refers to the existence of records in information systems and on tangible media.

Personal data is processed and stored in information systems, as well as on paper by the Operator. Personal data is also stored electronically: in the Operator's local computer network, in electronic folders and files of employees authorized to process personal data.

Personal data may be stored for no longer than the purposes of processing require, unless otherwise provided by federal laws of the Russian Federation.

15. Final provisions

The Operator reserves the right to unilaterally make any changes to the Policy at any time at its discretion. The changes will take effect after they are posted on the Website.