

# PERSONAL DATA PROCESSING POLICY

## 1. GENERAL PROVISIONS

This personal data processing policy is compiled in accordance with the requirements of Federal Law No. 152-FZ "On Personal Data" of July 27, 2006 (the "Personal Data Law"). It defines the procedure for the processing of personal data and the measures undertaken by JSC "MC of IS and TC "Sirius" (the "Site Administration") to ensure the security of personal data. It is effective as of February 8, 2025.

- 1.1. The most important goal of the Site Administration and a condition for its activities is to respect the rights and freedoms of man and the citizen in the processing of personal data, including the protection of rights to privacy and personal and family secrets.
- 1.2. This Site Administration policy regarding the processing of personal data (the "Policy") applies to all information that the Site Administration may receive about visitors to the [siriusmasterplan.com](http://siriusmasterplan.com) website.

## 2. BASIC CONCEPTS USED IN THE POLICY

- 2.1 Automated processing of personal data – the processing of personal data using computer technology.
- 2.2 Blocking of personal data – the temporary suspension of personal data processing (except when processing is necessary to clarify personal data).
- 2.3 Website – the set of graphic and informational materials, as well as the computer programs and databases that ensure their accessibility on the Internet at the network address [siriusmasterplan.com](http://siriusmasterplan.com).
- 2.4 Information system of personal data – the set of personal data contained in databases of personal data, as well as the information technology and technical means that enable its processing.
- 2.5 Depersonalization of personal data – actions that make it impossible to determine, without the use of additional information, the ownership of personal data by a specific User or other owner of personal data.
- 2.6 Personal data processing – any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including the collection, recording, systematization, acquisition, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, removal, or destruction of personal data.
- 2.7 Site Administration of the Nationwide competition website (the "Site Administration") – personnel authorized to manage the website, acting on behalf of JSC "MC of IS and TC "Sirius", who organize and (or) process personal data, as well as determine the purpose of personal data processing, the composition of the personal data to be processed, and the actions (operations) performed with personal data.
- 2.8 Personal data – any information related directly or indirectly to a specific or defined User of the [siriusmasterplan.com](http://siriusmasterplan.com) website.
- 2.9 Personal data authorized by the owner of personal data for distribution – personal data, access to which is provided to the general public by the owner of the personal data by giving consent to the processing of the personal data authorized by the owner of personal data for distribution in the manner prescribed by the Personal Data Law ("personal data authorized for distribution").
- 2.10 User – any visitor to the [siriusmasterplan.com](http://siriusmasterplan.com) website.
- 2.11 Provision of personal data – actions intended to disclose personal data to a certain person or a certain set of people.
- 2.12 Distribution of personal data – any action intended to disclose personal data to an indefinite set of people (transfer of personal data) or to familiarize an unlimited set of people with personal data, including the disclosure of personal data in the media, the placement of personal data on information and telecommunications networks, or the provision of access to personal data in any other way.
- 2.13 Cross-border transfer of personal data – the transfer of personal data to the territory of a foreign country, to a foreign authority, to a foreign individual, or to a foreign legal entity.
- 2.14 Destruction of personal data – any action resulting in the irretrievable destruction of personal data with the inability to further restore the contents of personal data in the information system of personal data and (or) the destruction of material media carrying personal data.

## 3. BASIC RIGHTS AND DUTIES OF THE SITE ADMINISTRATION

- 3.1. The Site Administration has the right:

- to receive reliable information and/or documents containing personal data from the owner of personal data;
- if the owner of personal data withdraws consent to the processing of personal data, to continue processing personal data without the consent of the owner of personal data under the conditions specified in the Personal Data Law;
- to independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations under the Personal Data Law and the regulations adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal legislation.

3.2. The Site Administration shall:

- provide the owner of personal data, upon his/her request, information regarding the processing of his/her personal data;
- organize the processing of personal data in accordance with the procedure established by the applicable legislation of the Russian Federation; respond to appeals and requests from owners of personal data or their legal representatives in accordance with the requirements of the Personal Data Law;
- report to the authorized body for the protection of the rights of owners of personal data, upon the request of this body, any information requested within 30 days from the date of receipt of such a request;
- publish or otherwise provide unrestricted access to this Personal Data Processing Policy;
- take legal, organizational, and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, or distribution and from other illegal actions regarding personal data;
- stop the transfer (distribution, provision, access) and processing of personal data and destroy personal data in the manner and in the circumstances stipulated by the Personal Data Law;
- perform any other duties stipulated by the Personal Data Law.

#### **4. BASIC RIGHTS AND DUTIES OF OWNERS OF PERSONAL DATA**

4.1. The owner of personal data has the right:

- to receive information concerning the processing of his/her personal data, except in cases provided for by federal legislation. Information shall be provided to the owner of personal data by the operator in an accessible form, and it shall not contain personal data relating to other owners of personal data, except in circumstances in which there is legitimate cause for the disclosure of such personal data. The list of information and the procedure for obtaining it is established by the Personal Data Law;
- to require the operator to clarify his/her personal data and to block or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained, or not necessary for the stated purpose of processing and also to take statutory measures to protect their rights;
- to set forth the condition of prior consent when processing personal data in order to promote goods, works, or services on the market;
- to withdraw consent to personal data processing;
- to appeal to the authorized body for the protection of the rights of the owners of personal data or in court against illegal actions or inactions by the Operator in the processing of his/her personal data;
- to exercise other rights stipulated by the legislation of the Russian Federation.

4.2. The owner of personal data shall:

- provide the Site Administration with reliable information about himself/herself;
- notify the Site Administration of clarifications (updates, changes) of his/her personal data.

4.3. Those who provide the Site Administration with false information about themselves, or information about another owner of personal data without the consent of the latter, shall be liable in accordance with the legislation of the Russian Federation.

#### **5. THE SITE ADMINISTRATION MAY PROCESS THE FOLLOWING PERSONAL DATA OF USERS**

- 5.1 Full name.
- 5.2 Email address.
- 5.3 Phone numbers.
- 5.4 Year, month, day, and place of birth.
- 5.5 Photos.
- 5.6 The website also collects and processes depersonalized data about visitors (including cookies) using Internet statistical services (Yandex Metrika, Google Analytics, and others).
- 5.7 Further in the text of this Policy, the above data are combined under the general term "Personal Data".
- 5.8 The Site Administration performs no processing of special categories of personal data relating to race, ethnicity, political views, religious or philosophical beliefs, or intimate life.

- 5.9 The processing of personal data authorized for distribution from among the special categories of personal data specified in Part 1 of Article 10 of the Personal Data Law is permitted, provided that the prohibitions and conditions specified in Article 10.1 of the Personal Data Law are observed.
- 5.10 The User's consent to the processing of personal data authorized for distribution is provided separately from other consent to the processing of his/her personal data. In this case, the conditions provided for, in particular, by Article 10.1 of the Personal Data Law are observed. The requirements for the content of such consent shall be established by the authorized body for the protection of the rights of the owners of personal data.
- 5.11 The User provides consent to the processing of personal data authorized for distribution directly to the Site Administration.
- 5.12 The Site Administration shall, within three business days from the date of receipt of the said User consent, publish information about the conditions of processing and the existence of prohibitions and conditions on the processing of personal data authorized for distribution to an unlimited number of persons.
- 5.13 The transfer (distribution, provision, access) of personal data authorized for distribution by the owner of the personal data shall be terminated at any time upon request of the owner of the personal data. This requirement shall include the surname, first name, patronymic (if any), and contact information (phone number, email address, or mailing address) of the owner of the personal data, as well as a list of personal data, the processing of which is to be terminated. The personal data specified in this request may be processed only by the Site Administration to which it is sent.
- 5.14 Consent to the processing of personal data authorized for distribution expires at the moment the Site Administration receives the request specified in clause 5.13 of this Policy regarding the processing of personal data.

## **6. PRINCIPLES OF PERSONAL DATA PROCESSING**

- 6.1 The processing of personal data shall be performed on a legal and fair basis.
- 6.2 The processing of personal data is limited to achieving specific, predetermined, and legitimate aims. Personal data may not be processed in a manner that is incompatible with the aims for which the personal data was collected.
- 6.3 Databases containing personal data may not be combined if they contain data which is processed for aims that are incompatible with one another.
- 6.4 Only personal data that suit the aims of processing are subject to processing.
- 6.5 The content and scope of the personal data processed shall correspond to the stated aims of processing. No surplus of processed personal data in excess of that needed for the stated aims of processing is permitted.
- 6.6 In the processing of personal data, the accuracy of personal data, its sufficiency, and, if necessary, relevance to the aims of processing personal data shall be ensured. The Site Administration shall take all necessary measures and/or ensure that they are taken to remove or clarify incomplete or inaccurate data.
- 6.7 Personal data shall be stored in a form that allows the identification of the owner of personal data, for no longer than is required by the aims of the processing of personal data, unless the period of storage of personal data is not established by federal legislation or a contract to which the owner of personal data is a party, beneficiary, or guarantor. Processed personal data shall be destroyed or depersonalized upon reaching the aims of processing or in the event of the loss of the need to achieve these aims, unless otherwise provided by federal legislation.

## **7. AIMS OF PERSONAL DATA PROCESSING**

- 7.1 The User's personal data is processed to:
  - provide the User with access to the services, information, and/or materials contained on the [info@siriusmasterplan.com](mailto:info@siriusmasterplan.com) website.
- 7.2 The Site Administration also has the right to send notifications to the User about new products and services, special offers, and various events. The User may always refuse to receive informational messages by sending an email to the Site Administration at the [info@siriusmasterplan.com](mailto:info@siriusmasterplan.com) email address with "Refuse notifications about new products and services and special offers" as the subject.
- 7.3 Depersonalized User data collected through Internet statistical services is used to collect information about Users' actions on the website in order to improve the quality of the website and its content.

## **8. LEGAL BASIS FOR PERSONAL DATA PROCESSING**

- 8.1. The legal basis for the processing of personal data by the Site Administration:

- contracts concluded between the operator and the owner of personal data;
  - federal laws and other regulations in the area of personal data protection;
  - consent of Users to the processing of their personal data and to the processing of personal data authorized for distribution.
- 8.2. The Site Administration processes the personal data of the User only if it is entered by the User and/or sent through the special forms located on the [siriusmasterplan.com](http://siriusmasterplan.com) website or sent to the Site Administration by email. The User agrees with this Policy by completing the appropriate forms and/or sending his/her personal data to the Site Administration.
- 8.3. The Site Administration processes depersonalized data about the User if this is allowed by the settings in the User's browser (that is, if the saving of cookie files and the use of JavaScript technology are enabled).
- 8.4. The owner of personal data independently decides to provide his/her personal data and gives consent freely, of his/her own free will and in his/her own interest.

## **9. CONDITIONS FOR PROCESSING PERSONAL DATA**

- 9.1 Personal data shall be processed only with the consent of the owner of personal data to the processing of his/her personal data.
- 9.2 The processing of personal data is necessary to achieve the goals set forth by an international treaty of the Russian Federation or by law or to perform the functions, powers, and duties assigned by the legislation of the Russian Federation to the operator.
- 9.3 The processing of personal data is necessary for the administration of justice, the execution of a judicial act, or an act of another body or official to be executed in accordance with the legislation of the Russian Federation on enforcement proceedings.
- 9.4 The processing of personal data is necessary for the performance of an agreement to which the owner of personal data is a party, beneficiary, or guarantor or to conclude an agreement on the initiative of the owner of personal data or an agreement to which the owner of personal data will be a beneficiary or guarantor.
- 9.5 The processing of personal data is necessary to exercise the rights and legitimate interests of the operator or third parties or to achieve socially important goals, provided that the rights and freedoms of the owner of personal data are not violated.
- 9.6 It is necessary to process personal data to which access has been granted by the owner of personal data to an unlimited number of persons or upon his/her request ("publicly available personal data").
- 9.7 Personal data which are subject to publication or mandatory disclosure in accordance with federal law are processed.

## **10. PROCEDURE FOR THE COLLECTION, STORAGE, TRANSFER, AND OTHER PROCESSING OF PERSONAL DATA**

The security of personal data which is processed by the Site Administration is ensured by the implementation of the legal, organizational, and technical measures necessary to fully comply with applicable legislation in the field of personal data protection.

- 10.1. The Site Administration ensures the safety of personal data and takes all possible measures to prevent access to personal data by unauthorized parties.
- 10.2. The personal data of the User will never, under no circumstances, be transferred to third parties, except in cases related to the implementation of applicable law or if the owner of personal data has provided consent to the Site Administration to transfer data to a third party to fulfill obligations under a civil law contract.
- 10.3. If there are any inaccuracies in the personal data, the User may update it himself/herself or by sending notification to the Site Administration at the [info@siriusmasterplan.com](mailto:info@siriusmasterplan.com) email address with "Update of personal data" as the subject.
- 10.4. The term of personal data processing is determined by the achievement of the aim for which the personal data has been collected, unless another term is stipulated by contract or by applicable legislation.
- 10.5. The User may withdraw consent to the processing of personal data at any time by sending notification to the Site Administration via email at the [info@siriusmasterplan.com](mailto:info@siriusmasterplan.com) email address with "Withdrawal of consent to the processing of personal data" as the subject.
- 10.6. All information collected by third-party services, including payment systems, means of communication, or other service providers, is stored and processed by these parties (Site Administration) in accordance with their User Agreements and Privacy Policies. The owner of personal data and/or the User is obliged to familiarize

himself/herself with these documents in a timely manner. The Site Administration is not responsible for the actions of third parties, including the service providers mentioned in this paragraph.

- 10.7. The prohibitions established by the owner of personal data on the transfer (with the exception of granting access), as well as the processing or processing conditions (except for obtaining access) of personal data authorized for distribution, shall not apply in cases of the processing of personal data in the state, social, or other public interest, as defined by Russian legislation.
- 10.8. The Site Administration ensures the confidentiality of personal data in the processing of personal data.
- 10.9. The Site Administration shall store personal data in a form that allows the identification of the owner of the personal data, for no longer than is required by the aims of the processing of personal data, unless the period of storage of personal data is not established by federal legislation or a contract to which the owner of the personal data is a party, beneficiary, or guarantor.
- 10.10. The conditions for termination of personal data processing include the achievement of the aims of personal data processing, the expiration of the consent of the owner of personal data, the withdrawal of consent by the owner of personal data, or the detection of improper processing of personal data.

## **11. LIST OF ACTIONS PERFORMED BY THE SITE ADMINISTRATION WITH PERSONAL DATA RECEIVED**

- 11.1. The Site Administration collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes, and destroys personal data.
- 11.2. The Site Administration performs automated processing of personal data with or without the receipt and/or transfer of the information received via information and telecommunications networks.

## **12. CROSS-BORDER TRANSFER OF PERSONAL DATA**

- 12.1. Before any cross-border transfer of personal data, the Site Administration shall ensure that the foreign country to whose territory the personal data shall be transfer ensures the reliable protection of the rights of owners of personal data.
- 12.2. The cross-border transfer of personal data to foreign countries that do not meet the above requirements may be performed only if there is written consent from the owner of personal data to the cross-border transfer of his/her personal data and/or the execution of an agreement to which the owner of personal data is a party.

## **13. CONFIDENTIALITY OF PERSONAL DATA**

The Site Administration and other parties who have access to personal data shall not disclose to third parties nor distribute personal data without the consent of the owner of personal data, unless otherwise provided by federal legislation.

## **14. CONCLUSION**

- 14.1. The User may receive any clarifications on matters of interest related to the processing of his/her personal data by contacting the Site Administration via email at [info@siriusmasterplan.com](mailto:info@siriusmasterplan.com).
- 14.2. Any changes to the policy for the processing of personal data by the Site Administration shall be reflected in this document. The policy is valid indefinitely until it is replaced by a new version.
- 14.3. The current version of the Policy is freely available on the Internet at [siriusmasterplan.com](http://siriusmasterplan.com).