

POLICY ON PERSONAL DATA PROCESSING

1. GENERAL PROVISIONS

1.1. This policy on personal data processing (hereinafter the "Policy") has been developed in accordance with the requirements of clause 2, part 1, Article 18.1 of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" (hereinafter the "Personal Data Law") in order to ensure the protection of human and civil rights and freedoms when processing personal data, including the protection of the rights to privacy, personal and family secrecy.

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

Employees of the Operator.

Applicants for vacant positions of the Operator.

Counterparties of the Operator (individuals).

Representatives (employees) of the Operator's counterparties (legal entities and individual entrepreneurs).

Clients of the Operator.

Users of the Operator's Website.

1.3. Key terms used in the Policy:

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

Personal data operator (Operator) means Noazzi LLC, OGRN 1227700390631, INN 9703095570, 123001, Moscow, Granatny Lane, 4, building 4, which independently or jointly with other persons organizes and/or carries out personal data processing, and also determines the purposes of personal data processing, the scope of personal data to be processed, and the actions (operations) performed with personal data;

Personal data processing means any action (operation) or set of actions (operations) performed with personal data, whether using automation tools or without them. Personal data processing includes, among other things: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion and destruction;

Automated personal data processing means processing personal data using computer technology;

Distribution of personal data means actions aimed at disclosing personal data to an indefinite circle of persons;

Provision of personal data means actions aimed at disclosing personal data to a specific person or a specific circle of persons;

Blocking of personal data means temporary suspension of personal data processing, except where processing is necessary to clarify 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 tangible media containing personal data;

Depersonalization of personal data means actions resulting in the impossibility, without the use of additional information, of determining whether personal data belong to a specific personal data subject;

Personal data information system means a set of personal data contained in databases and the 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 a foreign state authority, 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 information and telecommunications network and located at: www.thngs.world.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 fulfilment of the obligations provided for by the Personal Data Law and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws;

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. The person processing personal data on behalf of the Operator must comply with the principles and rules of personal data processing provided for by the Personal Data Law;

in the event that the personal data subject withdraws consent to personal data processing, continue processing personal data without such consent where there are grounds specified in the Personal Data Law.

1.4.2. The Operator is obliged to:

organize personal data processing in accordance with the requirements of the Personal Data Law;

respond to requests and inquiries from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;

provide the authorized body for the protection of the rights of personal data subjects (hereinafter "Roskomnadzor") with the necessary information upon request within 30 days from the date of receipt of such request.

1.5. Main rights of Personal Data Subjects. A personal data subject has the right to:

receive information concerning the processing of his or her personal data, except in cases provided for by federal laws. Such information is provided by the Operator to the personal data subject in an accessible form and must not contain personal data relating to other personal data subjects, except where there are lawful grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Personal Data Law;

require the Operator to clarify his or her personal data, block or destroy them if the personal data are incomplete, outdated, inaccurate, unlawfully obtained or unnecessary for the stated purpose of processing, and take measures provided by law to protect his or her rights;

appeal to Roskomnadzor or to a court against unlawful actions or omissions of the Operator in the processing of personal data.

The personal data subject may exercise the rights to receive information concerning the processing of personal data, and the rights to clarification, blocking or destruction of personal data, by sending the Operator a relevant request to: 123001, Moscow, Granatny Lane, 4, building 4, or by sending a relevant request by email to noazzi@bk.ru. In both cases, the request must comply with the requirements of Article 6.1 of this Policy.

1.6. Control over compliance with the requirements of this Policy is carried out by the authorized person responsible for organizing personal data processing at the Operator.

1.7. Liability for violation of the requirements of the legislation of the Russian Federation and local acts of the Operator in the field of personal data processing and protection is determined in accordance with the legislation of the Russian Federation.

2. PRINCIPLES OF PERSONAL DATA PROCESSING

2.1. Personal data are processed by the Operator in accordance with the requirements of the legislation of the Russian Federation and on the basis of the following principles:

lawfulness and fairness;

limiting personal data processing to the achievement of specific, predetermined and lawful purposes;

preventing personal data processing that is incompatible with the purposes of personal data collection;

preventing the merging of databases containing personal data processed for purposes incompatible with each other;

processing only personal data that correspond to the purposes of their processing;

ensuring that the content and scope of processed personal data correspond to the stated purposes of processing;

preventing the processing of excessive personal data in relation to the stated purposes of processing;

ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of personal data processing;

destroying or depersonalizing personal data upon achievement of the purposes of processing or where it is no longer necessary to achieve those purposes, if the Operator cannot eliminate violations of personal data, unless otherwise provided by federal law.

3. LEGAL GROUNDS FOR PERSONAL DATA PROCESSING

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

the Constitution of the Russian Federation;

the Labor Code of the Russian Federation;

the Civil Code of the Russian Federation;

the Tax Code of the Russian Federation;

Federal Law No. 402-FZ of December 6, 2011 "On Accounting";

other regulatory legal acts governing relations connected with the Operator's activities.

3.2. The legal grounds for personal data processing also include:

the Operator's Charter;
agreements concluded with the Personal Data Subject;
the Personal Data Subject's consent to personal data processing.

4. PURPOSES AND CONDITIONS OF PERSONAL DATA PROCESSING

4.1. Personal data processing is limited to the achievement of specific, predetermined and lawful purposes. Processing of personal data incompatible with the purposes of personal data collection is not allowed. Only personal data that correspond to the purposes of their processing are subject to processing.

4.2. The content and scope of processed personal data must correspond to the stated purposes of processing provided for in this section. The processed personal data must not be excessive in relation to the stated purposes of processing.

4.3. In accordance with this Policy, the Operator may process personal data belonging to the following categories of Personal Data Subjects:

Employees of the Operator.

Applicants for vacant positions of the Operator.

Counterparties of the Operator (individuals).

Representatives (employees) of the Operator's counterparties (legal entities and individual entrepreneurs).

Clients of the Operator.

Users of the Operator's Website.

4.3.1. Employees of the Operator

4.3.1.1. The Operator processes employees' personal data for the following purposes:

Assisting employees in employment, education and promotion.

Formalizing employment relations with employees.

Ensuring the safety of property.

4.3.1.2. When concluding an employment agreement, employees give the Operator written consent to the processing of their personal data. The content of the employee's consent must be specific and informed, containing information that makes it possible to clearly identify the purposes and methods of processing, the actions performed with personal data, and the scope of personal data processed.

4.3.1.3. When concluding an employment agreement, employees provide the Operator with the following documents containing their personal data:

passport or other identity document;

employment record book and/or employment activity information, except where the employment agreement is concluded for the first time;

document confirming registration in the individual (personalized) record system, including in electronic form;

military registration documents for persons liable for military service and persons subject to conscription;

document on education and/or qualification or special knowledge, when applying for work requiring special knowledge or special training;

other documents in accordance with legal requirements.

4.3.1.4. If an employment agreement is concluded with an employee for the first time, the employment record book and the state pension insurance certificate are issued by the Operator.

4.3.1.5. If other documents are required for employment in accordance with legislation, the Operator requests such documents containing personal data from the person applying for employment.

4.3.1.6. For the above purposes, the Operator processes the following categories of employees' personal data:

Surname, name and patronymic.

Residential address.

Education.

Profession.

Passport data.

Contact phone number.

Email address.

Income.

Position.

Taxpayer Identification Number (INN).

SNILS.

Marital status.

4.3.1.7. The Operator does not process employees' biometric personal data, meaning information characterizing physiological and biological features of a person on the basis of which his or her identity can be established.

4.3.1.8. The Operator does not process special categories of employees' personal data.

4.3.1.9. The Operator carries out automated, non-automated and mixed processing of employees' personal data with or without receipt and/or transfer of the obtained information through information and telecommunications networks.

4.3.1.10. List of actions for processing employees' personal data: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, blocking, deletion and destruction.

4.3.1.11. The Operator has the right to process personal data of dismissed employees in cases and within periods provided for by the legislation of the Russian Federation, including processing personal data for accounting and tax accounting purposes and ensuring the preservation of documents necessary for calculation, withholding and transfer of tax.

4.3.1.12. The Operator must store accounting documentation within the periods established in accordance with state archival rules, but the minimum storage period may not be less than 5 (five) years.

4.3.1.13. Upon expiry of the periods established by the legislation of the Russian Federation, employees' personal files and other documents are transferred for archival storage for a period of 50 years. Processing of such information does not require compliance with conditions related to obtaining consent for personal data processing. Employees' consent to processing their personal data in the cases provided for in clauses 4.3.1.11–4.3.1.12 of this Policy is not required.

4.3.1.14. Disclosure to third parties and distribution of personal data without the employee's consent is not allowed, unless otherwise provided by federal law.

4.3.1.15. When transferring an employee's personal data, the Operator must comply with the following requirements:

it is prohibited to disclose an employee's personal data to a third party without the employee's written consent, except where this is necessary to prevent a threat to the employee's life and health, and in cases established by federal law;

the employee transferring an employee's personal data of the Operator must warn the persons receiving such data that the data may be used only for the purposes for which they were disclosed, and require such persons to confirm compliance with this rule. Persons receiving an employee's personal data of the Operator must maintain confidentiality. This provision does not apply to the exchange of employees' personal data in the manner established by federal laws;

the employee transferring an employee's personal data of the Operator has the right to transfer such personal data to employee representatives in the manner established by the Labor Code of the Russian Federation and to limit such information to the personal data necessary for those representatives to perform their functions;

transfer of employees' personal data to the Social Insurance Fund of the Russian Federation and the Pension Fund of the Russian Federation in the manner established by federal laws, including the Federal Law "On Compulsory Pension Insurance in the Russian Federation", the Federal Law "On the Fundamentals of Compulsory Social Insurance", and the Federal Law "On Compulsory Medical Insurance in the Russian Federation", is carried out without employees' consent.

4.3.1.16. The Operator does not carry out cross-border transfer of employees' personal data.

4.3.1.17. Employees must be familiarized, against signature, with the Operator's local regulatory acts establishing the procedure for personal data processing and with their rights and obligations in this area.

4.3.2. Applicants for vacant positions of the Operator

4.3.2.1. The Operator processes personal data of applicants for vacant positions for the purpose of considering the applicant for a vacant position and deciding whether to hire or refuse to hire.

4.3.2.2. Consent from applicants for vacant positions is obtained if they are invited for an interview.

4.3.2.3. Applicants for vacant positions send their personal data directly to the Operator's email address or through specialized Internet resources (job aggregators).

4.3.2.4. Applicants posting resumes on electronic Internet resources (job aggregators) do so in accordance with the rules of those resources. By sending a resume to the Operator's email address, applicants thereby give implied consent to the processing of their personal data.

4.3.2.5. For the above purposes, the Operator processes the following categories of personal data of applicants for vacant positions:

Surname, name and patronymic.

Residential address.

Education.

Profession.

Passport data.

Contact phone number.

Email address.

Income.

Position.

Marital status.

4.3.2.6. The Operator does not process biometric personal data of applicants for vacant positions.

4.3.2.7. The Operator does not process special categories of personal data of applicants for vacant positions.

4.3.2.8. The Operator carries out non-automated processing of personal data of applicants for vacant positions without receipt and/or transfer of the obtained information through information and telecommunications networks.

4.3.2.9. List of actions for processing personal data of applicants for vacant positions: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, blocking, deletion and destruction.

4.3.2.10. During interviews with applicants for vacant positions, personal data contained in questionnaires and resumes may be confirmed by documents. Copies of supporting documents may be stored by the Operator, but no longer than until the purposes of their processing are achieved or the need to achieve such purposes is lost. After the purpose of processing is achieved, personal data of applicants for vacant positions must be deleted within 30 days.

4.3.2.11. Disclosure to third parties and distribution of personal data without the applicant's consent is not allowed, unless otherwise provided by federal law.

4.3.2.12. The Operator does not carry out cross-border transfer of personal data of applicants for vacant positions.

4.3.3. Counterparties of the Operator (individuals)

4.3.3.1. The Operator processes personal data of counterparties (individuals) for the purpose of concluding and performing agreements.

4.3.3.2. Processing personal data of counterparties (individuals) does not require additional consent if such processing is carried out in accordance with clause 5, part 1, Article 6 of the Personal Data Law.

4.3.3.3. For the above purposes, the Operator processes the following categories of personal data of counterparties (individuals):

Surname, name and patronymic.

Residential address.

Education.

Profession.

Passport data.

Contact phone number.

Email address.

Income.

Position.

Taxpayer Identification Number (INN).

SNILS.

4.3.3.4. The Operator does not process biometric personal data of counterparties (individuals).

4.3.3.5. The Operator does not process special categories of personal data of counterparties (individuals).

4.3.3.6. Counterparties (individuals) transfer personal data when concluding an agreement. Personal data of counterparties (individuals) are stored for the term of contractual obligations and/or within periods established by law.

4.3.3.7. The Operator carries out automated, non-automated and mixed processing of personal data of counterparties (individuals) with or without receipt and/or transfer of the obtained information through information and telecommunications networks.

4.3.3.8. List of actions for processing personal data of counterparties (individuals): collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, blocking, deletion and destruction.

4.3.3.9. Disclosure to third parties and distribution of personal data without the counterparty's consent is not allowed, unless otherwise provided by federal law.

4.3.3.10. The Operator does not carry out cross-border transfer of personal data of counterparties (individuals).

4.3.4. Representatives (employees) of the Operator's counterparties (legal entities and individual entrepreneurs)

4.3.4.1. The Operator processes personal data of representatives (employees) of counterparties for the following purposes:

Performance of agreements with counterparties.

Ensuring access control.

4.3.4.2. Consent to transfer personal data of representatives (employees) of counterparties to the Operator is obtained directly by the counterparty whose employee or representative is the personal data subject whose data are processed by the Operator. Consent from representatives (employees) of counterparties is obtained by the Operator in the following cases:

Ensuring access control.

4.3.4.3. For the above purposes, the Operator processes the following categories of personal data of representatives (employees) of counterparties:

Surname, name and patronymic.

Residential address.

Passport data.

Contact phone number.

Email address.

4.3.4.4. The Operator does not process biometric personal data of representatives (employees) of counterparties.

4.3.4.5. The Operator does not process special categories of personal data of representatives (employees) of counterparties.

4.3.4.6. The Operator carries out automated, non-automated and mixed processing of personal data of representatives (employees) of counterparties with or without receipt and/or transfer of the obtained information through information and telecommunications networks.

4.3.4.7. List of actions for processing personal data of representatives (employees) of counterparties: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, blocking, deletion and destruction.

4.3.4.8. Disclosure to third parties and distribution of personal data without the representative's consent is not allowed, unless otherwise provided by federal law.

4.3.4.9. The Operator does not carry out cross-border transfer of personal data of representatives (employees) of counterparties.

4.3.5. Clients of the Operator

4.3.5.1. The Operator processes clients' personal data for the following purposes:

Conclusion and performance of agreements.

Organizing participation in the loyalty program.

Sending advertising information about goods and services.

4.3.5.2. Processing clients' personal data does not require additional consent if such processing is carried out in accordance with clause 5, part 1, Article 6 of the Personal Data Law. Consent from clients is obtained in the following cases:

Participation in the loyalty program.

Sending advertising information about goods and services.

4.3.5.3. For the above purposes, the Operator processes the following categories of clients' personal data:

Surname, name and patronymic.

Residential address.

Contact phone number.

Email address.

Gender.

Credentials for logging into the personal account.

4.3.5.4. The Operator does not process clients' biometric personal data.

4.3.5.5. The Operator does not process special categories of clients' personal data.

4.3.5.6. Clients transfer personal data when concluding an agreement. Clients' personal data are stored for the term of contractual obligations and/or within periods established by law.

4.3.5.7. The Operator carries out automated processing of clients' personal data with or without receipt and/or transfer of the obtained information through information and telecommunications networks.

4.3.5.8. List of actions for processing clients' personal data: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), depersonalization, blocking, deletion and destruction.

4.3.5.9. Disclosure to third parties and distribution of personal data without the client's consent is not allowed, unless otherwise provided by federal law.

4.3.5.10. Within the country, the Operator may transfer clients' personal data for the purposes specified in this section to transport companies, the list of which is posted on the Website at: www.thngs.world.ru.

4.3.5.11. The Operator does not carry out cross-border transfer of clients' personal data.

4.3.6. Users of the Operator's Website

4.3.6.1. The Operator processes users' personal data for the following purposes:

Processing applications on the Website.

Sending advertising information about goods and services.

Improving user experience.

Maintaining website visit statistics.

4.3.6.2. Processing users' personal data is carried out subject to prior consent.

4.3.6.3. For the above purposes, the Operator processes the following categories of users' personal data:

Surname, name and patronymic.

Residential address.

Contact phone number.

Date and time of visiting the Website.

IP address assigned to the device for Internet access.

Browser and operating system type.

URL of the website from which the transition to the Website was made.

Cookies.

Data collected on the Website through website visitor statistics aggregators.

4.3.6.4. The Operator does not process users' biometric personal data.

4.3.6.5. The Operator does not process special categories of users' personal data.

4.3.6.6. The Operator carries out automated processing of users' personal data with or without receipt and/or transfer of the obtained information through information and telecommunications networks.

4.3.6.7. List of actions for processing users' personal data: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, blocking, deletion and destruction.

4.3.6.8. Disclosure to third parties and distribution of personal data without the user's consent is not allowed, unless otherwise provided by federal law.

4.3.6.9. The Operator does not carry out cross-border transfer of users' personal data.

4.3.6.10. The information banner appearing on the Website informs the user about the processing of cookies and user data. The user may give consent to the processing of the above-mentioned personal data by continuing to use the Website, or refuse to give such consent by disabling the processing of cookies and the collection of user data in browser settings, or by leaving the Website.

4.3.6.11. Although most browsers accept cookies automatically, the user may configure the browser so that only the user decides whether to accept or block cookies (the user should refer to the "Tools" or "Settings" menu of the browser used). The user may delete cookies from the device at any time. However, if the user does not accept cookies, some Website functions may be lost. More detailed information about managing cookies can be found in the browser help file or on specialized websites.

4.3.6.12. The Operator uses the Yandex.Metrica tool to collect information about the use of the Website, such as the frequency of visits by users, pages visited, and websites where users were before visiting this Website. Yandex.Metrica collects only the IP addresses assigned to you on the day of visiting this Website, and not your name or other identifying information.

4.3.6.13. Yandex.Metrica places a persistent cookie file in your web browser to identify you as a unique user on your next visit to this Website. This cookie file may not be used by anyone other than Yandex. Information collected using the cookie file will be transferred to and stored on Yandex servers.

4.3.6.14. We use information obtained through Yandex.Metrica only to improve the services on this Website. We do not combine information obtained through Yandex.Metrica with personal information.

4.3.6.15. Yandex's ability to use and transfer to third parties information collected through Yandex.Metrica about your visits to this Website is limited by the Yandex Privacy Policy. You can prevent Yandex.Metrica from recognizing you on repeat visits to this Website by disabling Yandex.Metrica cookies in your browser.

5. PROCEDURE FOR COLLECTION AND STORAGE OF PERSONAL DATA

5.1. When collecting personal data, including through the Internet information and telecommunications network, the Operator ensures recording, systematization, accumulation, storage, clarification (updating, modification) and extraction of personal data of citizens of the Russian Federation using databases located in the territory of the Russian Federation.

5.2. Persons who have transferred to the Operator information about another Personal Data Subject, including through the Website, without the consent of the subject whose personal data were transferred, are liable in accordance with the legislation of the Russian Federation.

5.3. The Operator stores personal data in a form that makes it possible to identify the personal data subject no longer than required by the purposes of personal data 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.

5.4. Processed personal data are subject to destruction in the following cases:

expiry of the personal data processing period;

achievement of the purposes of personal data processing;
loss of necessity to achieve the purposes of personal data processing;
receipt of withdrawal of consent to personal data processing;
exclusion of the Operator from the Unified State Register of Legal Entities.

6. PERSONAL DATA PROTECTION

6.1. The Operator takes necessary legal, organizational and technical measures to protect personal data against unlawful or accidental access, destruction, modification, blocking, distribution and other unauthorized actions, including:

identifying threats to the security of personal data during processing;
adopting local regulatory acts and other documents governing relations in the field of personal data processing and protection;
appointing persons responsible for ensuring personal data security in the Operator's structural divisions and information systems;
creating necessary conditions for working with personal data;
organizing accounting of documents containing personal data;
organizing work with information systems in which personal data are processed;
storing personal data under conditions that ensure their safety and exclude unlawful access to them;
organizing training for the Operator's employees who process personal data.

7. UPDATING, CORRECTION, DELETION AND DESTRUCTION OF PERSONAL DATA; RESPONSES TO REQUESTS OF SUBJECTS FOR ACCESS TO PERSONAL DATA

7.1. Confirmation of the fact of personal data processing by the Operator, the legal grounds and purposes of personal data processing, and other information specified in part 7 of Article 14 of the Personal Data Law are provided by the Operator to the Personal Data Subject or his or her representative upon application or upon receipt of a request from the Personal Data Subject or his or her representative. The information provided does not include personal data relating to other Personal Data Subjects, except where there are lawful grounds for disclosing such personal data.

The request must contain:

the number of the main identity document of the Personal Data Subject or his or her representative, information on the date of issue of that document and the issuing authority;
information confirming the Personal Data Subject's participation in relations with the Operator (agreement number, agreement date, conditional verbal designation and/or other information), or information otherwise confirming the fact of personal data processing by the Operator;
signature of the Personal Data Subject or his or her representative.

The request may be sent in electronic document form and signed with an electronic signature in accordance with the legislation of the Russian Federation.

If the application (request) of the Personal Data Subject does not contain all necessary information in accordance with the requirements of the Personal Data Law, or if the subject does not have rights of access to the requested information, a reasoned refusal is sent to the subject.

The Personal Data Subject's right of access to his or her personal data may be restricted in accordance with part 8 of Article 14 of the Personal Data Law, including where the Personal Data Subject's access to his or her personal data violates the rights and lawful interests of third parties.

7.2. If inaccurate personal data are identified upon application by the Personal Data Subject or his or her representative, or upon their request or a request from Roskomnadzor, the Operator blocks the personal data relating to that Personal Data Subject from the moment of such application or receipt of the request for the period of verification, provided that blocking personal data does not violate the rights and lawful interests of the Personal Data Subject or third parties.

If the inaccuracy of personal data is confirmed, the Operator, on the basis of information provided by the personal data subject or his or her representative, Roskomnadzor, or other necessary documents, clarifies the personal data within seven business days from the date such information is provided and removes the blocking of personal data.

7.3. If unlawful processing of personal data is identified upon application (request) by the Personal Data Subject or his or her representative, or by Roskomnadzor, the Operator blocks the unlawfully processed personal data relating to that Personal Data Subject from the moment of such application or receipt of the request.

7.4. Upon achievement of the purposes of personal data processing, and also in the event that the Personal Data Subject withdraws consent to processing, personal data are subject to destruction unless:

otherwise provided by an agreement to which the Personal Data Subject is a party;

the Operator is entitled to process data without the Personal Data Subject's consent on the grounds provided for by the Personal Data Law or other federal laws;

otherwise provided by another agreement between the Operator and the Personal Data Subject.

8. FINAL PROVISIONS

8.1. The Operator may send the Personal Data Subject advertising and informational messages by email, SMS and push notifications only subject to prior consent to receive advertising in accordance with part 1 of Article 18 of Federal Law No. 38-FZ of March 13, 2006 "On Advertising". Consent to receive advertising messages from the Operator by email, SMS and push notifications is provided in written form or in electronic form by ticking the relevant box on the Website.

The Personal Data Subject has the right to refuse to receive advertising messages by following the relevant link in emails received from the Operator, by sending a notice of refusal to receive advertising messages to support at the Operator's address: 123001, Moscow, Granatny Lane, 4, building 4, or by sending a relevant request to the Operator by email at noazzi@bk.ru.

8.2. In compliance with the requirements of part 2 of Article 18.1 of the Personal Data Law, this Policy is posted at the Operator's location and is also published for free access on the Website in the Internet information and telecommunications network.