

PRIVACY POLICY OF VEGA INSTITUTE FOUNDATION WEBSITE

Moscow

APPROVED

by the Order No. 5 dated May 26, 2021

1. General provisions

1.1. This Privacy Policy (hereinafter, “**Policy**”) has been composed in accordance with requirements of the Federal Law No. 152-FZ “On Personal Data” dated July 27, 2006 (hereinafter, “**Law on Personal Data**”) and defines the sequence of personal data processing and the measures to secure the said personal data taken by the Foundation for Advancement of Science VEGA Institute of Financial Mathematics and Actuary (hereinafter, “**Foundation**”).

1.2. The respect for rights and freedoms of humans and citizens related to personal data processing, including protection of rights of private life, personal and family secrets, serve as the Foundation’s priority goal and condition for administering personal data processing activities.

1.3. The provisions of this Policy hold true for all personal data processed by the Foundation and serve as the basis for organizing personal data processing at the Foundation, including development of other internal norms regulating the process of personal data protection.

1.4. This Policy of the Operator regarding personal data processing (hereinafter, “**Policy**”) is applicable to all information that the Operator may gather about the visitors to <http://vega-institute.org/> website (hereinafter, “**Foundation Website**”).

1.5. This Policy covers the personal data processed by the Foundation that was received both prior to the introduction of this Policy and after the fact.

1.6. This Policy covers all data processing processes related to personal data of users of the Foundation Website that are performed by the Foundation and is binding for all of the Foundation’s employees who perform personal data processing by virtue of their official duties.

2. Definitions of terms used in the Policy

2.1 Automated personal data processing – personal data processing by means of computers.

2.2 Personal data blocking – temporary cessation of personal data processing (apart from cases when processing is required for clarification of personal data).

2.3 Website, Site – the aggregate of graphic and information materials as well as software applications and databases that enable its accessibility online using the Foundation Website’s web address.

2.4 Personal data information system – the aggregate of personal data contained in the databases and of IT solutions and hardware components that enable its processing.

2.5 Anonymization of personal data – actions that result in the inability to determine the belonging of personal data to the specific User or other personal data subject without the use of additional information.

2.6 Personal data processing – any action (operation) or aggregate of actions (operations) performed with or without the use of automation tools, including collection, recording, classification,

accumulation, storage, clarification (updates, changes), extraction, use, transmission (dissemination, provision, access), anonymization, blocking, deletion, and destruction of personal data.

2.7 Operator – government body, municipal body, legal entity or private person, who independently or together with other persons organizes and (or) performs personal data processing as well as defines the objectives of personal data processing, the content of personal data subject to processing, and the actions (operations) performed with personal data. The Foundation is the Operator.

2.8 Personal data – any information directly or indirectly related to the identified or identifiable private person (personal data subject), including the Users of the Foundation Website.

2.9 Personal data authorized by personal data subject for publication – personal data made accessible to the general public by the personal data subject by way of consenting to processing of personal data, authorized by the personal data subject under the terms set out in the Law on Personal Data (hereinafter, “**Personal Data Authorized for Publication**”).

2.10 User – any visitor to the Foundation Website.

2.11 Data sharing – actions directed at data sharing with a certain person or a certain group of people.

2.12 Publication of personal data – any actions directed at personal data sharing with the public at large (disclosure of personal data) or at familiarization of the public at large with private data, including, among others, publication of personal data in the media, distribution in data telecommunications networks or provision of access to personal data by any other way.

2.13 Personal data subject – User(s).

2.14 Trans-border disclosure of personal data – personal data disclosure to the territory of a foreign state to a government agency of a foreign state, a foreign private citizen or foreign legal entity.

2.15 Destruction of personal data – any actions that result in irretrievable destruction of personal data with no prospect of recovery of the personal data content in the personal data information system and (or) destruction of physical storage media of such personal data.

3. Principal rights and obligations of the Operator

3.1. Operator has a right:

- 1) to receive authentic information and/or documents that contain personal data from personal data subjects;
- 2) if a personal data subject recalls their consent to personal data processing, Operator has a right to continue processing of personal data without consent of the personal data subject for reasons specified in the Law on Personal Data;
- 3) independently determine the content and list of measures required and sufficient to ensure performance of obligations envisioned by the Law on Personal Data and relevant regulations, unless otherwise stipulated by the Law on Personal Data or other federal laws of the Russian Federation.

3.2. Operator shall be obliged:

- 1) to provide upon the personal data subject’s request information related to processing of their personal data;

- 2) to organize personal data processing under the current statutory procedure of the Russian Federation;
- 3) to respond to the inquiries and requests of personal data subjects and their legal representatives in accordance with requirements of the Law on Personal Data;
- 4) to report to the authorized body for protection of personal data subjects' rights the requested necessary data within 30 days of receiving such request;
- 5) to publish or somehow give unlimited access to this Privacy Policy;
- 6) to take legal, managerial and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, copying, disclosure, sharing, as well as from any other unlawful actions;
- 7) to cease the disclosure (sharing, provision, access) of personal data, cease processing and destroy personal data as and where stipulated by the Law on Personal Data;
- 8) to fulfill other obligations stipulated by the Law on Personal Data.

4. Principal rights and obligations of the personal data subjects

4.1. Personal data subjects have a right:

- 1) to receive information related to the processing of their personal data except as otherwise provided by the federal laws of the Russian Federation. The Operator must provide information to the personal data subject in accessible form and this information must not contain personal data related to other personal data subjects except in the cases when legal grounds for disclosure of such personal data exist in accordance with the current legislation of the Russian Federation. The list of information and the procedure for its receipt are stipulated by the Law on Personal Data;
- 2) to demand from the Operator clarification, blocking or destruction of their personal data in the event that the personal data is incomplete, outdated, inaccurate, obtained unlawfully or unnecessary for the stated objective of processing, as well as to enforce their other rights;
- 3) to set forth the condition of preliminary consent if the personal data is processed for promotion on the market of goods, works and services;
- 4) to recall their consent to personal data processing;
- 5) to lodge a complaint with the authorized body for protection of personal data subjects' rights or appeal to a court in the event of the Operator's unlawful actions or failure to act in the process of their personal data processing;
- 6) to exercise other rights stipulated by the legislation of the Russian Federation.

4.2. Personal data subjects shall be obliged:

- 1) to provide the Operator with authentic personal data;
- 2) to inform Operator about current personal data changes (update, modification).

4.3. Persons who had submitted false information about themselves or information about other personal data subject without the latter's consent to the Operator will be held liable in accordance with the legislation of the Russian Federation.

5. Volume and categories of processed personal data, categories of personal data subjects

5.1. The Foundation processes the personal data of the following categories of personal data subjects:

- 1) Persons who register at the Foundation Website.
- 2) Persons who filled out the contact form on the Foundation Website.
- 3) Persons who submitted an application to the courses presented at the Foundation Website.

5.2. The Foundation processes the following categories of personal data of the Foundation Website's Users:

- 1) Last name, name, patronymic; 2) Email address; 3) Phone number;
- 4) Photographs;

5.3. The Foundation Website collects and processes anonymized visitor data (including cookies).

6. Objectives of personal data processing

6.1. Objectives of personal data processing

- 1) Creation of User's account on the Foundation Website.
- 2) Identification of Users registered on the Foundation Website;
- 3) Providing Users with access to the Foundation Website's personalized resources, including but not limited to, recordings and broadcasts of lectures and seminars;
- 4) Informing Users about events organized by the Foundation, lectures, seminars, conferences, roundtable discussions by way of email communications;
- 5) Providing Users with access to services, information and/or materials that the Website contains.

6.2. The Operator has a right to send to Users notifications about events organized by the Foundation, lectures, seminars, conferences, roundtable discussions. A User can always opt out of notifications by sending the Operator a letter to email address info@vega-institute.org with subject line "Unsubscribe from notifications about new products, services and special offers."

6.3. The Operator does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, intimate life, biometric data, except for the medical details required for implementation of measures aimed at containing the outbreak of the new coronavirus infection (COVID-19) stipulated by laws and other regulations.

6.4. Processing of personal data permitted for publication from the special categories of personal data stipulated in part 1 article 10 of the Law on Personal Data is admissible in the event of compliance with the restrictions and terms stipulated by article 10.1 of the Law on Personal Data.

7. List of personal data operations performed by the Operator

7.1. Operator performs collection, recording, classification, accumulation, storage, clarification (updates, changes), extraction, use, transmission (publication, disclosure, access), anonymization, blocking, deletion and destruction of personal data.

7.2. Operator performs automated personal data processing with or without receipt and/or transmission of received information using data telecommunications networks.

8. Personal data authorized by personal data subject for publication

8.1. A User's consent to processing of personal data authorized for publication is signed separately from other consents to personal data processing. This is accompanied by the compliance with terms stipulated, in particular, by article 10.1 of the Law on Personal Data. Requirements for the content of such consent are established by the authorized body for protection of personal data subjects' rights.

8.2. A User submits the consent to processing of personal data permitted for publication directly to the Operator.

8.3. Within three business days of receiving the said consent from the User, the Operator must publish information about terms of processing, existence of restrictions and conditions for processing of personal data authorized for publication to the general public.

8.4. Transmission (publication, disclosure, access) of personal data authorized by personal data subject for publication must be terminated at any time upon demand of the personal data subject. This demand must include the last name, name, patronymic (if applicable), contact information (phone number, email or postal address) of the personal data subject, as well as the list of personal data whose was sent.

8.5. Consent to processing of personal data authorized for publication is terminated from the moment the Operator receives the demand specified in item 8.4. of this Policy.

9. Principles of personal data processing

9.1. Personal data processing is performed legally and fairly.

9.2. Personal data processing is limited by achievement of specific, predefined, legal objectives. Personal data processing antithetical to the objectives of personal data processing is not allowed.

9.3. It is prohibited to integrate databases that contain personal data whose processing is performed for the mutually exclusive purposes.

9.4. Only personal data that serves the purpose of its processing may be processed.

9.5. Content and volume of processed personal data conform to the declared purposes of processing. Redundancy of processed personal data in relation to the declared purposes of its processing is not allowed.

9.6. In processing personal data, its accuracy, sufficiency, and, in certain cases, relevancy for the purposes of personal data processing must be ensured. The Operator takes necessary measures to delete or update incomplete or inaccurate data and/or ensures the performance of such measures.

9.7. The storage of personal data is performed in a way that enables identification of the personal data subject, and for no longer than this is required for the purposes of personal data processing unless the period of personal data storage is stipulated by the federal law or a contract, to which the personal data subject is a party, a beneficiary or a guarantor. The processed personal data is destroyed or anonymized after objectives of processing are achieved or the need to achieve these objectives is gone, unless otherwise stipulated by a federal law.

10. Legal grounds for personal data processing

10.1. Laws and regulations governing personal data processing:

- 1) Federal Law No. 152-FZ “On Personal Data” dated July 27, 2006;
- 2) Federal Law No. 149-FZ “On Information, Information Technology and the Protection of Information” dated July 27, 2006;
- 3) Statutory documents of the Foundation;
- 4) Users’ consent to personal data processing and to processing of personal data authorized for publication.

10.2. The Foundation processes the Users’ personal data if the Users fill out special forms and/or send this data using special forms on the Foundation Website. By filling out the relevant forms and/or sending their personal data to the Foundation, User consents to processing of their personal data and to this Policy as a whole.

10.3. Operator processes a User’s anonymized data if this is permitted by the User’s browser settings (retention of cookie fails and use of JavaScript are enabled).

10.4. Personal data subject independently makes a decision on provision of their personal data and consents to its processing of their free will and in their interest.

11. Conditions of personal data processing

11.1. Personal data processing is administered with the personal data subject’s consent to processing of their personal data.

11.2. Personal data processing is necessary for the achievement of objectives stipulated by an international agreement of the Russian Federation or a law for the exercise of powers, authority and obligations imposed on the Operator by the Russian Federation legislation.

11.3. Personal data processing is required for the delivery of justice, execution of a court ruling or a ruling of another government body or official enforceable in accordance with the Russian Federation legislation on enforcement proceedings.

11.4. Personal data processing is required for an execution of contract, to which the personal data subject is a party, a beneficiary or a guarantor, as well as for signing a contract at the behest of the personal data subject or a contract, to which the personal data subject will be a beneficiary or a guarantor.

11.5. Personal data processing is required for the exercise of rights and lawful interests of the Operator or third parties or for the achievement of publicly significant objectives under condition that the rights and freedoms of a personal data subject are not violated in the process.

11.6. The Operator administers processing of personal data, to which the personal data subject provides access to the general public or requests the provision of such access (hereinafter, “**Generally available personal data**”).

11.7. The Operator administers processing of personal data subject to publication or obligatory disclosure in accordance with a federal law.

12. Procedure for collection, storage, transmission and other types of personal data processing

12.1. Security of personal data processed by the Operator is ensured through implementation of legal, managerial and technical measures required for the fulfillment of current legislation requirements in the sphere of personal data protection.

12.2. The Operator ensures integrity of personal data and takes all the possible measures to preclude unauthorized persons' access to personal data.

12.3. Under no conditions will a User's personal data be shared with third persons except for the cases related to the enforcement or if the personal data subject has given the Operator their consent to share the data with a third party to fulfill its obligations under a civil contract.

12.4. In the event that omissions are discovered in the personal data, the User may update them on their own, by sending the Operator a notification to the email address info@vega-institute.org with subject line "Personal data update."

12.5. The period of personal data processing is determined by the achievement of objectives for which the personal data was collected unless other period is stipulated by contract or current legislation. A User may at any time recall their consent to personal data processing by sending the Operator notification by email to the Operator's address info@vega-institute.org with subject line "Recall of consent to personal data processing."

12.6. All information collected by third-party services including payment systems, means of communication and other service vendors is stored and processed by the said parties (Operators) in accordance with their user agreements and confidentiality policy. The personal data subject and/or User must familiarize themselves with the said documents on their own and in a timely manner. The Operator disclaims any responsibility for the actions of third parties, including the service vendors stipulated in this item.

12.7. The restrictions on transmission (except for provision of access) as well as processing or the terms of processing (except for receipt of access) of personal data permitted for publication that are set by the personal data subject are not valid if the personal data is processed in the state, public or other interests stipulated by the Russian Federation legislation.

12.8. In processing the personal data, the Operator ensures confidentiality of personal data.

12.9. The Operator administers storage of personal data in a form that enables identification of personal data subject for no longer than that is required for the purposes of personal data processing, unless the period for storage of personal data is stipulated by a federal law or a contract, to which the personal data subject is a party, a beneficiary or a guarantor.

12.10. The condition for termination of personal data processing may be the achievement of objectives of personal data processing, expiration of the personal data subject's consent or recall of consent by the personal data subject as well as the discovery of unlawful processing of personal data.

13. Trans-border disclosure of personal data

13.1. Prior to the start of trans-border disclosure of personal data, the Operator must ascertain that the foreign state to which the personal data will be transmitted guarantees reliable protection of the rights of personal data subjects.

13.2. Trans-border disclosure of personal data to the territory of foreign states that do not conform to the aforementioned requirements may be administered only in the presence of written consent of the personal data subject to trans-border disclosure of their personal data and/or for the execution of a contract, to which personal data subject is a party.

14. Confidentiality of personal data

The Operator and other persons with access to personal data must not share or disclose personal data to third parties without consent from the personal data subject unless otherwise stipulated by legislation.

15. Final provisions

15.1. The User may receive any clarifications to their inquiries related to processing of personal data by addressing the Operator by email info@vega-institute.org.

15.2. This document will reflect any changes to the Operator's Privacy Policy. This Policy remains in effect indefinitely until replaced with a new version.

15.3. The latest version of the Policy is freely available online at the Foundation Website. processing should be terminated. The personal data specified in this demand may be processed only by the Operator to which the demand