

# Personal Data Processing Policy for Website Users <https://itech-group.ru>

This Privacy Policy for the website <https://itech-group.ru> (hereinafter referred to as the Policy) is developed for the purpose of fulfilling the requirements of the legislation in the field of personal data processing and security and applies to all personal data that Itech-group (hereinafter referred to as Itech) may receive from the Internet network users when visiting and using the website <https://itech-group.ru> (hereinafter referred to as the Site).

This Policy applies to all processes for the collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction of personal data, exclusively by automated means. The Policy is mandatory for familiarization and execution by all persons involved in the processing of personal data.

By using the Site, each User expresses his consent to the terms of this Policy. This Policy shall be updated in the event of changes to the legislation of the Russian Federation on personal data, without prior notice and/or obtaining approval of the Users.

## Basic concepts

**User** — a natural person acting on their own behalf or on behalf of another person (including a legal entity);

**Data Controller** (hereinafter referred to as "Controller") — a person or persons organizing and/or performing the processing of personal data and determining the purposes of processing personal data, the composition of personal data to be processed, actions to be taken with the personal data. For the purposes of this document, Itech is recognized as the Controller;

**Personal Data** — any information related to a directly or indirectly identified or identifiable natural person;

**Processing of Personal Data** — any action or set of actions performed with personal data, using automation tools or without them. Processing of personal data includes gathering, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, usage, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction;

**Disclosure of Personal Data** — actions aimed at disclosing personal data to a certain person (a certain circle of persons);

**International Transfer of Personal Data** — transfer of personal data to the territory of a foreign state to a foreign state authority, a foreign natural person or a foreign legal entity.

## The basis for processing personal data

Processing of personal data is carried out with the consent of the User for the processing of his personal data.

### Categories and purposes of processed personal data:

Site Visitors may be Visitors (those who have accessed the site) and Clients/Contractors (representatives and/or employees of a company).

### The purpose of processing personal data of Site Visitors:

- Providing an opportunity to interact with the Site.
- Collecting statistics on types of contacts.
- Improving the operation of the Site, determining preferences.
- Analytics of actions on the Site.

### Category of processed data:

Cookies, information about User actions on the site, information about User equipment, date and time of User session.

### The purpose of processing personal data of Clients/Contractors (representatives and/or employees):

- Conclusion of any contracts and their further execution.

**Category of processed data:** in addition to data collected about Visitors, Name, Email and Phone Number are processed. The Operator does not process biometric personal data, as well as any information relating to special categories of personal data, concerning racial or ethnic origin, political views, religious or philosophical beliefs, intimate life, and does not carry out cross-border transfer of personal data to the territory of a foreign state. The volume of processed data does not exceed -100 000.

### User's Rights and Responsibilities:

The User is responsible for the accuracy of the provided information, as well as for updating the provided information in case of any changes. Thus, the User is required to use complete and accurate data and to update them in a timely manner when necessary.

### The User is entitled to:

- Receive information concerning the processing of his/her personal data by the Operator;
- Request from the Operator to clarify his/her personal data, to block or delete them in case the personal data is incomplete, outdated, inaccurate, illegally obtained or unnecessary for the stated purpose of processing;

— Request the Operator to cease processing his/her personal data in cases provided for by law.

## Operator's Rights and Responsibilities

The Operator is entitled to:

- Process personal data in accordance with the stated purpose;
- Require the provision of reliable personal data necessary for the fulfillment of his/her obligations and in other cases provided for by the law on personal data;
- Cease interaction with the User in case of his/her refusal to provide full and accurate personal data and his/her refusal to eliminate the identified deficiencies of personal data;
- Process personal data which were made publicly available by the User;
- Entrust the processing of personal data to a third party with the User's consent.

The operator is obliged to:

- Upon written request from the User (or his authorized representative), provide information regarding the processing of their personal data, or, on legal grounds, refuse to provide such information; clarify the processed personal data; block or delete personal data if it is incomplete, outdated, inaccurate, illegally obtained, or unnecessary for the declared purposes of processing.
- After the achievement of the purpose of processing personal data, immediately cease processing personal data and destroy corresponding personal data, unless otherwise provided for by federal laws, and notify the User or his authorized representative, and in the case of an appeal or request submitted to the authorized body for the protection of the rights of subjects of personal data, also to the mentioned body.
- In case of withdrawal of consent by the User to the processing of his personal data, to stop processing and destroy personal data within a period not exceeding 30 (thirty) calendar days from the date of receipt of such withdrawal, unless otherwise provided by federal law.
- Not to process personal data, including not to collect and transfer personal data to third parties without the consent of the User, unless otherwise provided for by federal law.

**Operator performs the following actions with personal data:** collection, recording, accumulation, storage, clarification (updating, modification), use, transfer (provision, access), deletion and destruction. Processing of personal data on the Site is carried out using automation tools.

**Transfer of personal data to third parties:** for the purpose of collecting statistics on Site Users, the Operator transmits cookie files, information about the User's actions on the Site, information about the User's equipment, date and time of the session to LLC "Yandex" (<https://yandex.ru/legal/confidential/index.html>), Google LLC (<https://policies.google.com/privacy>), LLC "Business-Analytics" (<https://roistat.com/ru/privacy>).

***The Operator undertakes the following measures to ensure the security of personal data being processed:*** it identifies potential security risks when processing personal data in information systems and takes organizational and technical measures necessary to comply with the requirements for the protection of personal data, the fulfillment of which ensures the levels of security of personal data established by the legislation of the Russian Federation.

***Processing period of personal data:*** processing of personal data by the Operator continues until the goals of processing of personal data are achieved; withdrawal of the User's consent to the processing of personal data; cessation of activity of the Operator.

***Order of appeal:*** for all matters relating to the action of this policy, Users have the right to apply to the Operator at the e-mail address [privacy@itech-group.ru](mailto:privacy@itech-group.ru), or by mail (courier service): LLC "Aitek-production", 432025, city of Ulyanovsk, Vatutina Street, house 49/2a. When processing appeals, the Operator is guided by the current legislation of the Russian Federation.