

# Personal Data Processing Policy

## 1. General provisions

This policy of personal data processing is made according to the requirements of Federal law No. 152-FZ *On Personal Data* of July 27, 2006 (hereinafter referred to as Personal Data Law) and defines the procedure of processing the personal data and measures on providing security of personal data taken by Interkros Center LLC (hereinafter referred to as Operator).

1.1. The Operator sets as its main purpose and condition of its operation the observance of rights and freedoms of a person and a citizen at processing of their personal data, including the protection of rights to privacy and personal and family secrets.

1.2. This Operator's policy regarding the processing of personal data (hereinafter referred to as Policy) applies to all the information that the Operator may receive about the visitors of the <https://bionium.info> website.

## 2. Basic terms used in the Policy

2.1. Automated Processing of Personal Data means the processing of personal data by means of computer technology.

2.2. Blocking of Personal Data means temporary termination of processing the personal data (except in cases where the processing is required to correct the personal data).

2.3. Website means a set of graphic and informational materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address <https://bionium.info>.

2.4. Personal Data Information System is a set of personal data contained in databases of personal data, and information technology and technical means ensuring their processing.

2.5. Anonymization of Personal Data means actions, as a result of which it is impossible to determine, without the use of additional information, whether the personal data belongs to a particular User or another personal data subject.

2.6. Processing of Personal Data means any action (operation) or set of actions (operations), performed with or without the use of automation means with personal data, including collection, recording, systematization, accumulation, storage, correction (updating and modification), extraction, use, transfer (distribution, provision, and access), anonymization, blocking, removal, and destruction of personal data.

2.7. Operator means a state body, municipal body, legal or natural person, individually or jointly with other persons, arranging and/or implementing the processing of personal data, and determining the purpose of personal data processing, composition of personal data subject to processing, and actions (operations) performed with personal data.

2.8. Personal Data means any information related directly or indirectly to a certain or defined User of the <https://bionium.info> website.

2.9. Personal Data Permitted by Personal Data Subject for Distribution means the personal data, access to which is provided to the general public by the personal data subject by giving consent to the processing of personal data permitted by the personal data subject for distribution in the manner prescribed by Personal Data Law (hereinafter referred to as Personal Data Permitted for Distribution).

2.10. User means any visitor to the <https://bionium.info> website.

2.11. Personal Data Provision means actions aimed at disclosure of personal data to a certain person or a specific group of people.

2.12. Distribution of Personal Data means any action aimed at disclosure of personal data to an unlimited number of persons (transfer of personal data) or at familiarization of the general public with personal data, including publication of personal data in the media, placing in information and telecommunications networks or providing access to personal data in any other way.

2.13. 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.

2.14. Destruction of Personal Data means any actions, as a result of which personal data is destroyed irretrievably with the impossibility of further restoration of the content of personal data in the information system of personal data, and (or) destruction of material media of personal data.

### **3. Principal rights and obligations of the Operator**

3.1. The Operator shall have the right to:

- Receive from the personal data subject reliable information and/or documents containing personal data;
- If the personal data subject withdraws consent to the processing of personal data, the Operator has the right to continue processing the personal data without the consent of the personal data subject, on the grounds specified in the Personal Data Law;
- Independently determine the composition and list of measures required and sufficient to ensure the performance of obligations provided by the Personal Data Law and the statutory regulations adopted thereunder, unless otherwise provided by the Personal Data Law or other federal laws.

3.2. The Operator shall:

- Provide the personal data subject, at their request, with information concerning the processing of their personal data;

- Arrange the processing of personal data in accordance with the procedure established by the applicable laws of the Russian Federation;
- Respond to requests and inquiries of personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
- Communicate to the authority responsible for the protection of personal data subject rights, at its request, the required information within 30 days from the date of receipt of such request;
- Publish or otherwise ensure unrestricted access to this Policy on processing of personal data;
- Take legal, managerial and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, and distribution of personal data, as well as other unlawful actions in relation to personal data;
- Stop the transfer (distribution, provision, and access) of personal data, and stop processing and destroy the personal data in the manner and cases provided by the Personal Data Law;
- Perform other obligations provided by the Personal Data Law.

#### **4. Basic rights and obligations of personal data subjects**

##### 4.1. Personal data subjects shall have the right to:

- Receive information relating to the processing of their personal data, except as provided by federal laws. Information shall be provided to the personal data subject by the Operator in an accessible form and shall not contain personal data relating to other personal data subjects, except in cases where there are legal grounds for disclosure of 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 their personal data, to block or destruct them if the personal data is incomplete, outdated, inaccurate or illegally obtained, or are not necessary for the stated purpose of processing, as well as to take statutory measures to protect their rights;
- Require prior consent for the processing of personal data for the purpose of market promotion of goods, works and services;
- Withdraw the consent to the processing of personal data;
- File a complaint to an authorized body for the protection of the rights of personal data subjects or sue for unlawful acts or omissions of the Operator in the processing of their personal data;
- Exercise other rights provided by the laws of the Russian Federation.

##### 4.2. Personal data subjects shall be obliged to:

- Provide the Operator with reliable data about themselves;
- Inform the Operator of the correction (updating, modification) of their personal data.

4.3. Persons who provided the Operator with false information on themselves, or the information on another personal data subject without the consent of the latter, shall be held responsible in accordance with the laws of the Russian Federation.

## **5. The Operator shall be entitled to process the following personal data of the User**

5.1. Surname, first name, patronymic.

5.2. E-mail address.

5.3. Phone numbers.

5.4. The website also collects and processes anonymized data about its visitors (including cookies) using Internet statistical services (Yandex Metrika, Google Analytics, etc.).

5.5. The above-mentioned data hereinafter in the text of this Policy shall be included in the general term of Personal Data.

5.6. The Operator shall not process special categories of personal data relating to race, ethnicity, political views, religious or philosophical beliefs, or intimate life.

5.7. The processing of personal data permitted for distribution, from among the special categories of personal data specified in Article 10.1 of the Personal Data Law, shall be allowed, if the prohibitions and conditions stipulated in Article 10.1 of the Personal Data Law are observed.

5.8. The User's consent to the processing of personal data which is permitted for distribution shall be drawn up separately from other consents to the processing of their personal data. In this case, the conditions stipulated, in particular, by Article 10.1 of the Personal Data Law shall be observed. The requirements for the content of such consent shall be established by a competent authority for the protection of personal data subjects' rights.

5.8.1. The User shall provide the consent to the processing of personal data allowed for distribution directly to the Operator.

5.8.2. The Operator shall be obliged within three business days from the receipt of the above consent of the User to publish information about the conditions of processing, the existence of prohibitions and the conditions for the processing of personal data, allowed for distribution, by an unlimited number of persons.

5.8.3. Transfer (distribution, provision, and access) of personal data permitted by the personal data subject for distribution shall be terminated at any time at the request of the personal data subject. This requirement shall include the surname, first name, patronymic (if any), contact information (telephone number, e-mail or mailing address) of the personal data subject, as well as a list of personal data the processing of which is to be terminated. The personal data specified in this request may only be processed by the Operator to which it is sent.

5.8.4. Consent to the processing of personal data permitted for distribution shall cease to be valid at the moment of receipt by the Operator of the request, specified in paragraph 5.8.3 of this Policy in relation to the processing of personal data.

## **6. Principles of personal data processing**

6.1. Personal data processing shall be carried out on a lawful and fair basis.

6.2. Personal data processing is limited to achieving specific, predetermined and legitimate purposes. Personal data processing that is incompatible with the purposes of personal data collection shall not be permitted.

6.3. Databases containing personal data whose processing is incompatible with the purposes of personal data collection shall not be consolidated.

6.4. Only the personal data that serve the purposes of their processing shall be processed.

6.5. Content and scope of the processed personal data shall comply with the stated processing purposes. The processed personal data shall not be excessive in relation to the stated processing purposes.

6.6. When processing the personal data, the accuracy of personal data, its sufficiency, and, if necessary, relevance in relation to the purpose of personal data processing shall be ensured. The Operator shall take necessary measures and/or ensure that they are taken to remove or correct incomplete or inaccurate data.

6.7. Personal data shall be stored 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 period of storage of personal data is established by federal law, by an agreement to which the personal data subject is a party, a beneficiary or a guarantor. The processed personal data shall be destroyed or anonymized upon attainment of processing purposes or if it is no longer necessary to attain such purposes, unless otherwise provided for by a federal law.

## **7. Purposes of personal data processing**

7.1. The purposes of processing of the User's personal data shall be the following:

- Informing the User by sending emails;
- Informing the User by telephone calls; and
- Processing incoming inquiries and communications with the User.

7.2. Besides the above, the Operator shall have the right to send the User notifications about new products and services, special offers and different events. The User can always refuse to receive information messages by sending an email to the Operator at [bionium@honeycow.ru](mailto:bionium@honeycow.ru) marked as "Refusal from notifications about new products and services and special offers".

7.3. The anonymized data of Users, collected by means of Internet statistics services, serves to collect information about the actions of Users on the website and to improve the quality of the website and its content.

## **8. Legal basis for personal data processing**

8.1. The legal basis for the personal data processing by the Operator shall be the following:

- Agreements entered into between the Operator and the personal data subject;
- Federal laws and other regulations in the field of protection of personal data; and
- User's consent to the processing of their personal data.

8.2. The Operator shall process the User's personal data only if the User fills out and/or sends the special forms located on the website <https://bionium.info> or sends the personal data to the Operator by e-mail. By filling out the relevant forms and/or sending their personal data to the Operator, the User agrees to this Policy.

8.3. The Operator shall process the anonymized data about the User if the settings of the User's browser allow such processing (saving of "cookie" files and use of JavaScript technology are enabled).

8.4. The personal data subject shall independently decide to provide their personal data and give consent freely, willingly and in their own interest.

## **9. Terms and conditions of personal data processing**

9.1. Personal data processing shall be carried out with the consent from the personal data subject to the processing of their personal data.

9.2. Personal data processing is required to attain the purposes set forth by an international treaty of the Russian Federation or by law, and to perform the functions, powers and obligations imposed on the Operator by the laws of the Russian Federation.

9.3. Personal data processing is required for administration of justice, execution of a judicial act, or act of another body or official to be executed pursuant to the Russian Federation laws on enforcement proceedings.

9.4. Personal data processing is required for execution of an agreement, a party to which or a beneficiary or guarantor under which the personal data subject is, as well as for entering into an agreement on the initiative of the personal data subject or an agreement, under which the personal data subject will be a beneficiary or guarantor.

9.5. The personal data processing is required for the exercise of the rights and legitimate interests of the Operator or third parties, or to achieve socially significant goals, provided that this does not violate the rights and freedoms of the personal data subject.

9.6. The processing shall be carried out in relation to the personal data, the access of the general public to which is provided by the personal data subject or at the subject's request (hereinafter referred to as the Publicly Available Personal Data).

9.7. The processing shall be carried out in relation to the personal data subject to publication or mandatory disclosure pursuant to the federal laws.

## **10. Procedure for collecting, storing, communicating and other types of personal data processing**

Security of personal data processed by the Operator shall be ensured by implementing legal, managerial and technical measures required to fully meet the requirements of applicable laws in the field of personal data protection.

10.1. The Operator shall provide security of personal data and take all possible measures to prevent access to personal data by unauthorized persons.

10.2. The personal data of the User shall never, under no circumstances, be transferred to third parties, except in cases related to the implementation of the applicable laws or if the personal data subject has given consent to the Operator to communicate the data to a third party to fulfill obligations under a civil law contract.

10.3. In case of identification of inaccuracies in personal data, the User may update them independently, by sending an email to the Operator at [bionium@honeycow.ru](mailto:bionium@honeycow.ru) marked as “Personal data updating”.

10.4. The term of personal data processing shall be determined by achieving the purposes for which the personal data have been collected, unless a different term is stipulated by the contract or by applicable law. The User may withdraw their consent to the personal data processing at any time by sending an email to the Operator at [bionium@honeycow.ru](mailto:bionium@honeycow.ru) marked as “Withdrawal of consent to the personal data processing”.

10.5. All information that is collected by third-party services, including payment systems, means of communication and other service providers, shall be stored and processed by the specified persons (Operators) in accordance with their User Agreement and Privacy Policy. The personal data subject and/or the User are obliged to review the specified documents on their own in due time. The Operator shall not be liable for the actions of third parties, including the service providers mentioned in this paragraph.

10.6. The prohibitions established by the personal data subject on the transfer (other than providing access), as well as on the processing or conditions for processing (other than gaining access) of personal data permitted for distribution shall not apply in cases of personal data processing in state, community and other public interests as defined by the laws of the Russian Federation.

10.7. The Operator shall ensure the confidentiality of personal data when processing the personal data.

10.8. The Operator shall store the 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 period of storage of personal data is established by a federal law, by an agreement to which the personal data subject is a party, a beneficiary or a guarantor.

10.9. A condition for termination of personal data processing may be the attainment of purposes of personal data processing, expiration of the personal data subject’s consent or withdrawal of consent by the personal data subject, as well as detection of unlawful personal data processing.

## **11. List of actions performed by the Operator with personal data obtained**

11.1. The Operator shall collect, record, systematize, accumulate, store, correct (update, modify), extract, use, transfer (distribute, communicate, provide access), anonymize, block, delete, and destroy personal data.

11.2. The Operator shall carry out automated personal data processing with or without the receipt and/or transmission of received information via information and telecommunications networks.

## **12. Cross-border transfer of personal data**

12.1. The Operator shall, prior to the cross-border transfer of personal data, ensure that a foreign country to whose territory the transfer of personal data is intended to take place provides reliable protection of the rights of personal data subjects.

12.2. The cross-border transfer of personal data to foreign countries, which do not meet the above requirements, may take place only in case the personal data subject provides a written consent to the cross-border transfer of their personal data and/or in case of fulfillment of the contract, to which the personal data subject is a party.

## **13. Confidentiality of personal data**

The Operator and other persons obtaining access to personal data shall not disclose to third parties and shall not disseminate personal data without the consent of the personal data subject, unless otherwise provided by federal laws.

## **14. Final Provisions**

14.1. The User can receive any clarifications on the issues of interest concerning the processing of their personal data by contacting the Operator by email at [bionium@honeycow.ru](mailto:bionium@honeycow.ru).

14.2. This document shall reflect any changes to the personal data processing policy of the Operator. The Policy shall be valid indefinitely until it is replaced by a new version.

14.3. The current version of the Privacy Policy is freely available on the Internet at <https://bionium.info/privacy>.