

Privacy Policy

Individual Entrepreneur Erastov Ilya Igorevich (hereinafter referred to as IE Erastov I.I.)

1. General Provisions

1.1. This Policy of Individual Entrepreneur Erastov Ilya Igorevich (hereinafter referred to as the Policy) has been developed in accordance with the requirements of paragraph 2, part 1, Article 18.1 of Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006 (hereinafter referred to as the Personal Data Law) to ensure the protection of the rights and freedoms of individuals when processing their personal data, including the protection of rights to privacy, personal and family secrets.

1.2. This Policy applies to all personal data processed by Individual Entrepreneur Erastov Ilya Igorevich (hereinafter referred to as the Operator, IE Erastov I.I.) using automation tools and without the use of such tools.

1.3. This Policy applies to the relationships in the field of personal data processing that have arisen for the Operator both before and after the approval of this Policy.

1.4. In accordance with the requirements of part 2, Article 18.1 of the Personal Data Law, this Policy is published in open access on the Operator's website on the Internet.

1.5. The Operator periodically updates this Policy and has the right to unilaterally modify its terms at any time. The Operator recommends checking the Policy for any possible changes. Unless otherwise specified, changes take effect from the date of approval of the Policy by the Operator's order.

2. Terms and Accepted Abbreviations

2.1. Personal Data (hereinafter referred to as PD) — any information relating to an identified or identifiable natural person (data subject). This includes any information that, when combined, can identify the data subject, such as: full name, date and place of birth, address, information about family, social, and property status, education, profession, income, phone number, email address, etc.

2.2. Data Operator (Operator) — a government body, municipal body, legal entity, or individual who, independently or in cooperation with other parties, organizes and/or carries out the processing of personal data, as well as determines the purposes of processing personal data, the composition of personal data subject to processing, and the actions (operations) performed with the personal data.

2.3. Personal Data Processing — any action (operation) or set of actions (operations)

with personal data, performed using automation tools or without them. Personal data processing includes, but is not limited to:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- clarification (updating, modification);
- extraction;
- use;
- transfer (provision, access);
- anonymization;
- blocking;
- deletion;
- destruction.

2.4. Automated Personal Data Processing — processing of personal data using computer-based means.

2.5. Provision of Personal Data — actions aimed at disclosing personal data to a specific person or a specific group of people.

2.6. Blocking of Personal Data — temporary suspension of personal data processing (except when processing is necessary for the clarification of personal data).

2.7. Destruction of Personal Data — actions that result in making it impossible to restore the content of personal data in a personal data information system and/or actions that result in the destruction of physical media containing personal data.

2.8. Anonymization of Personal Data — actions that make it impossible to determine the belonging of personal data to a specific data subject without the use of additional information.

2.9. Personal Data Information System — a set of personal data contained in databases and ensuring their processing, information technologies, and technical means.

2.10. Cross-border Transfer of Personal Data — the transfer of personal data to the territory of a foreign state to a foreign government authority, a foreign individual, or a foreign legal entity.

2.11. Processor — any person who, under a contract with the operator, processes personal data on behalf of the operator, acting on behalf of and/or in the interests of such operator. The operator is responsible to the data subject for the actions or inactions of the processor, while the processor is responsible to the operator.

2.12. Other terms used in this Policy are understood and interpreted in accordance with the applicable legislation of the Russian Federation.

3. Procedure and Conditions for Processing and Storing Personal Data

3.1. The processing of personal data is carried out by the Operator in accordance with the requirements of the legislation of the Russian Federation, taking into account the requirements of the Constitution of the Russian Federation, Federal Law No. 152-FZ "On Personal Data", subordinate legislation, and other laws of the Russian Federation that determine the cases and specificities of personal data processing.

3.2. When processing personal data, the Operator adheres to the following principles of personal data processing:

- legality and fairness;
- limitation of personal data processing to specific, predetermined, and legitimate purposes;
- prevention of processing personal data incompatible with the purposes of data collection;
- prevention of the merging of databases containing personal data, the processing of which is carried out for incompatible purposes;
- compliance of the content and scope of the processed personal data with the stated purposes of processing;
- prevention of the processing of excessive personal data relative to the stated purposes of processing;
- ensuring the accuracy of personal data, its sufficiency, and, if necessary, its relevance to the purposes of personal data processing, as well as taking measures to remove or clarify incomplete or inaccurate data;
- transparency of personal data processing: the data subject may be provided with relevant information regarding the processing of their personal data.

3.3. Personal data processing is carried out only when there is a legal basis for such processing and within the period determined by such legal basis.

Legal basis for personal data processing	Duration of personal data processing
With the consent of the data subject to process their personal data	For the period for which consent to the processing of personal data was given
For the performance of a contract to which the data subject is a party, a beneficiary, or a guarantor, as well as for the conclusion of a contract at the initiative of the data subject or a contract under which the data subject will be a beneficiary or a guarantor	For the duration of such a contract, unless a longer period for processing personal data is established by the applicable legislation of the Russian Federation or the contract
If necessary for the processing of personal data subject to publication or mandatory disclosure in accordance with federal law	For the period established by the relevant laws

Legal basis for personal data processing	Duration of personal data processing
For the protection of the life, health, or other vital interests of the data subject, if obtaining the consent of the data subject is not possible	Until the moment when obtaining the consent of the data subject becomes possible, or when the relevant circumstances threatening the life, health, or other vital interests cease to exist (whichever occurs first)
In connection with a person's participation in constitutional, civil, administrative, criminal proceedings, or proceedings in arbitration courts	For the duration of participation in the relevant proceedings, including the appeal (challenge) of judicial acts, unless a longer period for processing personal data is established by the applicable legislation of the Russian Federation

3.4. Personal data processing is allowed only for the Operator's employees whose job duties include personal data processing and/or processors.

3.4.1. The Operator has the right to engage a processor and assign personal data processing to that processor under a contract concluded with them. The Operator involves an external processor if they are unable to process personal data independently (due to lack of technical capabilities, insufficient knowledge, or resources) and/or if involving the processor will improve the Operator's service, enhance the effectiveness of services provided, and work performed.

At the same time, the processor is obliged to comply with the principles and rules of personal data processing as provided by Federal Law No. 152-FZ "On Personal Data", other laws, and subordinate acts. The contract between the Operator and the processor will specify which personal data will be processed, the purposes of processing, the list of actions, the obligation to maintain confidentiality of information at least to the extent required by law and the Operator's established practices, and other requirements and instructions facilitating the Operator's compliance with obligations to the data subjects.

3.5. IE Erastov I.I. may act as a processor, if there is a corresponding legal basis. However, the responsibility towards the data subject lies with the Operator who assigned the processing. The Operator who assigned the processing of personal data independently obtains the necessary consents from the data subjects. The Operator who assigned the processing has the right to request information about the personal data protection measures taken by IE Erastov I.I.

3.6. Unless otherwise provided by the legislation of the Russian Federation, the Operator terminates the processing of personal data (for any of the stated purposes) and destroys it in the following cases:

- termination of the Operator's activity;

- termination of the legal grounds for processing personal data (including the expiration of such grounds) and/or achievement of the purposes of personal data processing;
- withdrawal of the data subject's consent to the processing of personal data. The specific procedure for the destruction of personal data on carriers containing personal data, including external/removable electronic media, paper media, and information systems, is determined by the Operator in its internal documents and regulatory legal acts.

3.6.1. The Operator shall block personal data during the verification period upon a request from the data subject or their representative, or upon the request of the authorized body for the protection of the rights of data subjects, in the event of:

- detection of unlawful processing of personal data;
- detection of inaccurate personal data.

As a result of the verification, the Operator:

- terminates the unlawful processing of personal data. If the legality of processing personal data cannot be ensured, the Operator must destroy such personal data or ensure its destruction within ten working days from the date of detection of unlawful processing of personal data;
- ensures the correction of personal data (in case of inaccurate personal data) within seven working days from the submission of such information and removes the block on personal data.

3.7. The Operator may receive and process personal data automatically collected through metric programs that gather technical and marketing cookies. The handling of such data is defined by the "Cookie Policy". The processing of such data complies with the requirements of the legislation of the Russian Federation, the provisions of this Policy, and other internal documents of the Operator.

3.8. Cross-border transfer of personal data is not carried out.

4. Rights of the Data Subject. Interaction with the Operator on Personal Data Processing Issues

4.1. The data subject, whose personal data is processed by the Operator, has the right to:

- access to personal data;
- clarification of personal data (see clauses 3.6, 3.6.1 of the Policy);
- blocking and deletion of personal data (see clauses 3.6, 3.6.1 of the Policy);
- withdrawal of consent to the processing of personal data;
- exercise other rights provided by the legislation of the Russian Federation.

4.2. If no other procedure for interaction between the Operator and the data subject is specified in the relevant document (such as a contract or consent text for processing

personal data), to exercise the aforementioned rights, the data subject must send a request to the Operator:

- in writing, signed by hand — to the address: 143920, Moscow region, Zhukovsky, Adm. Makaryova St., 6, apt. 8;
- in the form of an electronic document signed by an electronic signature — to the email address budget@spansagency.com.

This request must obligatorily include a description of the data subject's requirements, as well as the following information:

- full name of the data subject;
- number of the main identity document of the data subject or their representative, details about the issuance date of the document and the issuing authority, or other information that allows the clear identification of the data subject;
- information confirming the data subject's participation in the relationship with the Operator, or other information that confirms the fact of processing personal data by the Operator;
- the signature of the data subject or their representative (in which case, documents confirming the representative's authority must be attached, prepared in accordance with the law).

4.3. The data subject also has the right to appeal the actions (inactions) and decisions of the Operator that violate their rights in personal data processing to the authorized body for the protection of the rights of data subjects (Roskomnadzor) and to the court in the manner prescribed by the legislation of the Russian Federation.

4.4. Individuals who have provided the Operator with inaccurate information about themselves or about another data subject without their consent are liable in accordance with the legislation of the Russian Federation.

5. Rights and Obligations of the Personal Data Operator

5.1. The Operator has the right to:

- receive from the data subject accurate information and/or documents containing personal data;
- in case of the data subject withdrawing consent to the processing of personal data or submitting a request to cease processing personal data, the Operator has the right to continue processing personal data without the consent of the data subject if there are grounds specified in the Personal Data Law;
- independently determine the composition and list of measures necessary and sufficient to ensure compliance with the obligations set forth in the Personal Data Law and the regulations adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws.

5.2. The Operator is obligated to:

- provide the data subject with information regarding the processing of their personal data upon request;

- organize the processing of personal data in accordance with the procedures established by the current legislation of the Russian Federation;
- respond to requests and inquiries from data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
- notify the authorized body for the protection of data subject rights upon request of this body, providing the necessary information within 10 days of receiving such a request;
- publish or otherwise ensure unrestricted access to this Policy regarding the processing of personal data;
- take legal, organizational, and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as other unlawful actions related to personal data;
- cease the transfer (dissemination, provision, access) of personal data, cease processing, and destroy personal data in the manner and cases specified in the Personal Data Law;
- perform other duties specified by the Personal Data Law.

6. Information on the Measures for Personal Data Protection

6.1. The Operator, when processing personal data:

- takes necessary and sufficient measures to ensure compliance with the requirements of the legislation of the Russian Federation, internal documents, and local regulations of the Operator in the field of personal data;
- takes legal, organizational, and technical measures to ensure compliance with the requirements of the legislation of the Russian Federation, protecting personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, dissemination, as well as other unlawful actions related to personal data;
- appoints a person responsible for organizing the processing of personal data;
- issues internal documents defining the Operator's policy regarding personal data processing, local regulations on personal data processing, and procedures aimed at preventing and detecting violations of the legislation of the Russian Federation, and eliminating the consequences of such violations;
- organizes the accounting of documents containing personal data;
- organizes the operation of information systems where personal data is processed, ensuring their functionality within the Operator's authority and the security of data in such information systems;
- performs internal control and/or audit of compliance of personal data processing with the requirements of the legislation of the Russian Federation, regulations adopted in accordance with it, other requirements for personal data protection, this Policy, internal documents, and local regulations of the Operator in the field of personal data;
- publishes or otherwise ensures unrestricted access to this Policy;

- conducts an assessment of potential harm to the data subject;
- terminates the processing of personal data and destroys it in cases prescribed by the legislation of the Russian Federation;
- informs the employees of the Operator directly involved in the processing of personal data about the provisions of the legislation of the Russian Federation on personal data, including requirements for personal data protection, documents defining the Operator's policy on personal data processing, and local regulations on personal data processing, and conducts training for these employees;
- takes other actions provided by the legislation of the Russian Federation in the field of personal data.

6.1.1. Legal, organizational, and technical measures to ensure compliance with the requirements of the legislation of the Russian Federation, protection of personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, dissemination, as well as other unlawful actions in relation to personal data, include, in particular:

- development of a threat model;
- identification of security threats to personal data during their processing in personal data information systems;
- application of organizational and technical measures to ensure the security of personal data during their processing in personal data information systems, necessary to meet the personal data protection requirements, compliance with which ensures the levels of personal data security established by the Government of the Russian Federation;
- use of information protection tools that have passed the established conformity assessment procedure;
- assessment of the effectiveness of measures taken to ensure the security of personal data before the personal data information system is put into operation;
- accounting of machine carriers of personal data;
- detection of unauthorized access to personal data and taking measures;
- restoration of personal data that has been modified or destroyed as a result of unauthorized access;
- establishing access rules for personal data processed in personal data information systems, as well as ensuring the registration and accounting of all actions performed with personal data in personal data information systems;
- monitoring the security measures taken to ensure the security of personal data and the security level of personal data information systems;
- placement of technical means for processing personal data within a protected area.

6.2. The Operator regularly reviews and updates the measures taken to ensure the best protection of processed personal data. These measures are described in this Policy, internal documents, and local regulations of the Operator.

7. Purposes of Personal Data Processing

Purpose of Personal Data Processing	Categories of Data Subjects	List of Personal Data
Use, including visiting, the Operator's website	Website Users	Information collected through metric programs, including technical data about user devices and identifiers (cookies)
Quality control of the use of the Operator's website, collection of statistics and other analytics	Website Users	Information collected through metric programs, including technical data about user devices and identifiers (cookies)
Conclusion, execution, and termination of other civil law contracts with third parties	Individuals – parties to civil law contracts	<ul style="list-style-type: none"> • Citizenship; • Full name; • Passport data; • Taxpayer Identification Number (TIN); • Contact information (phone number, email address, messenger ID); • Registration address and actual residence address; • Bank details (only for remunerated contracts); • Individual entrepreneur registration number and other information contained in the Unified State Register of Individual Entrepreneurs (EGRNIP); • Information on the individual's self-employed status; • Other information voluntarily provided by the data subject.
	Individuals – representatives of counterparties	<ul style="list-style-type: none"> • Full name; • Contact information (phone number, email address, nicknames, and IDs in messengers); • Power of attorney details; • Place of employment and position.

Purpose of Personal Data Processing	Categories of Data Subjects	List of Personal Data
	Individuals – those who submitted a request on the Operator's website	<ul style="list-style-type: none"> • Name • Contact information (email address, Telegram ID); • Other information voluntarily provided by the data subject.
Personnel document management, including the formation, maintenance, and storage of employee personal files, work books, and other personnel documents, as well as military registration and migration registration	<ul style="list-style-type: none"> • Employees; • Former employees; • Close relatives of employees, including former employees. 	<ul style="list-style-type: none"> • Citizenship; • Full name; • Passport data; TIN, SNILS; • Contact information (phone number, email address, messenger ID); • Registration address and actual residence address; • Bank details; • Education information; • Military registration information; • Information contained in the work book, information about work experience, previous places of employment, income from previous jobs; • Other data voluntarily provided by the employee, including former employees, to the Company – for example, information about individual achievements to be included in the work book.
Compliance with and implementation of the requirements of the current labor legislation of the Russian Federation (calculation and payment of wages, making other due payments under labor legislation, granting vacations, sending on business trips, involving in disciplinary or material liability, etc.)	Employees	<ul style="list-style-type: none"> • Citizenship; • Full name; • Passport data; • TIN, SNILS; • Contact information (phone number, email address, messenger ID); • Registration address and actual residence address; • Bank details; • Education information; • Military registration information; • Information contained in the work book, information

Purpose of Personal Data Processing	Categories of Data Subjects	List of Personal Data
		<ul style="list-style-type: none"> • about work experience, previous places of employment, income from previous jobs; • Other data voluntarily provided by the employee, including former employees, to the Company – for example, information about individual achievements to be included in the work book.
Processing of information (resume) of a job candidate	Candidates for filling vacant positions	<ul style="list-style-type: none"> • Full name; • Contact information (phone number, email address, messenger ID); • Other information voluntarily provided by the data subject.