

Personal Data Processing Policy

1. General Provisions

This Personal Data Processing Policy has been drafted in accordance with the requirements of Federal Law No. 152-FZ of 27 July 2006 “On Personal Data” (hereinafter – the “Personal Data Law”) and defines the procedure for processing personal data and the measures taken to ensure the security of personal data by IGROFEST LLC (hereinafter – the “Operator”).

1.1. The Operator makes it its most important goal and a condition of carrying out its activities to observe the rights and freedoms of individuals and citizens when processing their personal data, including the protection of the rights to privacy, and personal and family secrets.

1.2. This Operator’s Policy on Personal Data Processing (hereinafter – the “Policy”) applies to all information that the Operator may obtain about visitors to the website

<https://igm.agency>.

2. Basic Concepts Used in the Policy

2.1. Automated processing of personal data – processing of personal data by means of computer technology.

2.2. Blocking of personal data – temporary cessation of the processing of personal data (except where processing is necessary to clarify the personal data).

2.3. Website – a set of graphic and informational materials, as well as computer programs and databases, making them

accessible on the Internet at the network address

<https://igm.agency>.

2.4. Personal data information system – a set of personal data contained in databases, and the information technologies and technical means that enable their processing.

2.5. Anonymization of personal data – actions as a result of which it becomes impossible, without the use of additional information, to determine the attribution of personal data to a specific User or other personal data subject.

2.6. Processing of personal data – 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, clarification (updating, modification), retrieval, use, transfer (dissemination, provision, access), anonymization, blocking, deletion, and destruction of personal data.

2.7. Operator – a state body, municipal body, legal entity or individual that, independently or jointly with other persons, organizes and/or carries out the processing of personal data, and also determines the purposes of personal data processing, the composition of personal data to be processed, and the actions (operations) performed with personal data.

2.8. Personal data – any information relating directly or indirectly to a specific or identifiable User of the website

<https://igm.agency>.

2.9. Personal data authorized by the personal data subject for dissemination – personal data to which an unlimited number of persons have been granted access by the personal data subject by giving consent to the processing of personal data authorized by the personal data subject for dissemination in accordance with the procedure established by the Personal Data Law (hereinafter – personal data authorized for dissemination).

2.10. User – any visitor to the website <https://igm.agency>.

2.11. Provision of personal data – actions aimed at disclosing personal data to a specific person or a specific group of persons.

2.12. Dissemination of personal data – any actions aimed at disclosing personal data to an indefinite number of persons (transfer of personal data) or at making personal data available to an unlimited number of persons, including publication of personal data in the media, placement in information and telecommunication networks, or provision of access to personal data in any other way.

2.13. Cross-border transfer of personal data – 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 – any actions as a result of which personal data are destroyed irretrievably without the possibility of further restoration of the content of the personal data in the personal data information system and/or the material carriers of personal data are destroyed.

3. Basic Rights and Obligations of the Operator

3.1. The Operator has the right to:- receive from the personal data subject reliable information and/or documents containing personal data;- in the event that the personal data subject withdraws consent to the processing of personal data, or sends a request to terminate the processing of personal data, continue processing personal data without the consent of the personal data subject where grounds specified in the Personal Data Law exist;- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations provided for by the Personal Data Law and the regulatory legal acts adopted in accordance therewith, unless otherwise provided by the Personal Data Law or other federal laws.

3.2. The Operator is obliged to:- provide the personal data subject, at their request, with information relating to the processing of their personal data;- organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;- respond to inquiries and requests of personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;- report the necessary information to the authorized body for the protection of the rights of personal data subjects upon the request of such body within 10 days from the date of receipt of such request;- publish or otherwise ensure unrestricted access to this Personal Data Processing Policy;- take legal, organizational and technical measures to protect personal data from unlawful or accidental access thereto, destruction, modification, blocking, copying,

provision, dissemination of personal data, and from other unlawful actions with respect to personal data;- cease the transfer (dissemination, provision, access) of personal data, cease processing and destroy personal data in the manner and in the cases provided for by the Personal Data Law;- perform other duties provided for by the Personal Data Law.

4. Basic Rights and Obligations of Personal Data Subjects

4.1. Personal data subjects have the right to:- receive information relating to the processing of their personal data, except in cases provided for by federal laws. The information shall be provided to the personal data subject by the Operator in an accessible form, and it must not contain personal data relating to other personal data subjects, unless there are legal 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 their personal data, block or destroy them if the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, and also take measures provided for by law to protect their rights;- impose the condition of prior consent when processing personal data for the purpose of promoting goods, works and services on the market;- withdraw consent to the processing of personal data, and send a request to terminate the processing of personal data;- appeal to the authorized body for the protection of the rights of personal data subjects or to a court against unlawful actions or inaction of the Operator in processing their personal data;- exercise other rights provided for by the legislation of the Russian Federation.

4.2. Personal data subjects are obliged to:- provide the Operator with reliable data about themselves;- inform the Operator about the clarification (updating, modification) of their personal data.

4.3. Persons who have provided the Operator with false information about themselves or information about another personal data subject without the latter's consent bear liability in accordance with the legislation of the Russian Federation.

5. Principles of Personal Data Processing

5.1. Personal data shall be processed on a lawful and fair basis.

5.2. The processing of personal data shall be limited to the achievement of specific, pre-defined and lawful purposes. Processing of personal data incompatible with the purposes of the collection of personal data is not permitted.

5.3. The merging of databases containing personal data processed for incompatible purposes is not permitted.

5.4. Only personal data that meet the purposes of their processing shall be subject to processing.

5.5. The content and scope of the processed personal data shall correspond to the stated purposes of processing. Excessive personal data in relation to the stated purposes of their processing is not permitted.

5.6. When processing personal data, the accuracy, sufficiency, and, where necessary, relevance of the personal data to the purposes of processing shall be

ensured. The Operator shall take the necessary measures and/or ensure that measures are taken to delete or clarify incomplete or inaccurate data.

5.7. Personal data shall be stored in a form that allows identification of the personal data subject no longer than required by the purposes of processing personal data, unless the period for storage of personal data is established by federal law, or by a contract to which the personal data subject is a party, beneficiary or guarantor. Processed personal data shall be destroyed or anonymized upon achievement of the purposes of processing or in the event that the need to achieve these purposes is lost, unless otherwise provided by federal law.

6. Purposes of Personal Data Processing

7. Conditions for Personal Data Processing

7.1. Personal data shall be processed with the consent of the personal data subject to the processing of their personal data.

7.2. Personal data processing is necessary for achieving the purposes provided for by an international treaty of the Russian Federation or by law, for the exercise and performance of the functions, powers and duties imposed on the Operator by the legislation of the Russian Federation.

7.3. Personal data processing is necessary for the administration of justice, the execution of a judicial act, or an act of another body or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings.

7.4. Personal data processing is necessary for the performance of a contract to which the personal data subject is a party, beneficiary or guarantor, as well as for the conclusion of a contract on the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor.

7.5. Personal data processing is necessary for the exercise of the rights and legitimate interests of the Operator or third parties, or for the achievement of socially significant purposes, provided that the rights and freedoms of the personal data subject are not thereby violated.

7.6. Processing is carried out of personal data to which access has been granted to an unlimited number of persons by the personal data subject or at their request (hereinafter – publicly available personal data).

7.7. Processing is carried out of personal data subject to publication or mandatory disclosure in accordance with federal law.

8. Procedure for Collection, Storage, Transfer and Other Types of Personal Data Processing

The security of personal data processed by the Operator is ensured by implementing the legal, organizational and technical measures necessary to fully comply with the

requirements of the current legislation in the field of personal data protection.

8.1. The Operator ensures the safety of personal data and takes all possible measures to prevent access to personal data by unauthorized persons.

8.2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the enforcement of applicable law, or if the personal data subject has given consent to the Operator for the transfer of data to a third party for the performance of obligations under a civil law contract.

8.3. In the event that inaccuracies in personal data are identified, the User may update them independently by sending a notice to the Operator's email address ad@igm.gg with the subject "Updating Personal Data".

8.4. The period for processing personal data is determined by the achievement of the purposes for which the personal data were collected, unless a different period is provided for by the contract or applicable law. The User may at any time withdraw their consent to the processing of personal data by sending a notice via email to the Operator's email address ad@igm.gg with the subject "Withdrawal of Consent to Personal Data Processing".

8.5. All information collected by third-party services, including payment systems, communication services and other service providers, is stored and processed by such persons (Operators) in accordance with their User Agreements and Privacy Policies. The personal data subject should familiarize themselves with the said documents. The

Operator assumes no liability for the actions of third parties, including the service providers mentioned in this paragraph.

8.6. Prohibitions established by the personal data subject on the transfer (except for the provision of access), as well as on the processing or conditions of processing (except for obtaining access) of personal data authorized for dissemination, shall not apply in cases of processing of personal data in state, public and other public interests defined by the legislation of the Russian Federation.

8.7. When processing personal data, the Operator shall ensure the confidentiality of personal data.

8.8. The Operator shall store personal data in a form that allows identification of the personal data subject no longer than required by the purposes of personal data processing, unless the period for storage of personal data is established by federal law, or by a contract to which the personal data subject is a party, beneficiary or guarantor.

8.9. The condition for termination of personal data processing may be the achievement of the purposes of personal data processing, expiry of the personal data subject's consent, withdrawal of consent by the personal data subject or a request to terminate the processing of personal data, as well as the detection of unlawful processing of personal data.

9. List of Actions Performed by the Operator with the Received Personal Data

9.1. The Operator carries out collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (dissemination, provision, access), anonymization, blocking, deletion and destruction of personal data.

9.2. The Operator carries out automated processing of personal data with or without the receipt and/or transfer of the obtained information via information and telecommunication networks.

10. Cross-Border Transfer of Personal Data

10.1. The Operator shall, prior to commencing cross-border transfer of personal data, notify the authorized body for the protection of the rights of personal data subjects of its intention to carry out cross-border transfer of personal data (such notification shall be sent separately from the notification of the intention to process personal data).

10.2. The Operator shall, prior to submitting the above notification, obtain the relevant information from the authorities of a foreign state, foreign individuals, and foreign legal entities to which cross-border transfer of personal data is planned.

11. Confidentiality of Personal Data

The Operator and other persons who have obtained access to personal data are obliged not to disclose to third parties and not to disseminate personal data without the consent of the personal data subject, unless otherwise provided by federal law.

12. Final Provisions

12.1. The User may obtain any clarifications on matters of interest relating to the processing of their personal data by contacting the Operator via email at ad@igm.gg.

12.2. This document will reflect any changes to the Operator's personal data processing policy. The Policy is effective indefinitely until replaced by a new version.

12.3. The current version of the Policy is freely available on the Internet at <https://igm.agency>.