

Privacy policy

1. General provisions

1.1. This Privacy Policy (hereinafter referred to as the Policy) is developed in accordance with the requirements of paragraph 2 of Part 1 of Art. 18.1 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data" (hereinafter referred to as the Law on Personal Data) in order to ensure the protection of the rights and freedoms of a person and a citizen when processing his/her personal data, including the protection of the rights to privacy, personal and family secrets.

1.2. This Policy applies to all information that the Organization (Autonomous Non-Profit Organization in order to promote the development of sports "Forum "Country of Sports", address: 107031, Moscow, Rozhdestvenka Street, 5/7, bldg. 2, premises V, room 18, OGRN (Primary State Registration Number) 1117799007920 (hereinafter referred to as the Organization) may receive about the user/from the user providing personal information or interacting with the Organization (hereinafter referred to as the User, Users) through the website <https://sportforumrussia.ru/> (hereinafter referred to as the website), through the form of sending an electronic request (question, application) on the website, through the registration form (hereinafter referred to as the application), e-mails or other means.

1.3. The Policy applies to the relationship in the field of personal data processing that the Organization has both before and after the approval of this Policy.

1.4. Pursuant to the requirements of Part 2 of Article 18.1 of the Law on Personal Data, this Policy is published in free access on the information and telecommunication network Internet on the Organization's website.

1.5. By using the website, the User agrees to the use of his personal data in accordance with the Policy, including, but not limited to the following actions:

1.5.1. Implementation by the Organization of all necessary actions regarding the User's personal data to achieve the purposes of processing personal data described in clause 2 of the Policy, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data, as well as other actions with the User's personal data, taking into account the current legislation of the Russian Federation;

1.5.2. Storage of electronic and paper correspondence between the User and the Organization;

1.5.3. Providing by the Organization for the purposes specified in clause 2 of the Policy, information about the User to Performers – partners, contractors, agents and other persons with whom the Organization has concluded a relevant agreement, to the extent necessary for its execution. In this case, the consent to the processing of personal data is considered to be provided by the User to the third parties specified above in this paragraph, and such third parties have the right to process the User's personal data on this basis. At the same time, such Contractors process the User's personal data on the basis of their own Privacy Policies, and the User can withdraw his consent to the processing of personal data by sending a request to the Contractor.

1.6. The User confirms that his/her consent to the processing of personal data on the terms of the Policy in accordance with clause 1.5 of the Policy is valid for 5 (five) years from the date of their receipt. The retention period is extended for every next 5 (five) years, provided that the Organization does not have information about the withdrawal of consent to the processing of personal data.

1.7. General definitions applied in the Policy:

personal data means any information relating directly or indirectly to a particular or identifiable person (subject of personal data);

personal data operator (operator) means a state body, municipal body, legal or natural person, independently or jointly with other persons organizing and (or) processing personal data, as well as determining the purposes of personal data processing, the content of personal data to be processed, actions (operations) with personal data;

personal data processing - any action (operation) or set of actions (operations) with personal data performed with the use of automation tools or without their use. Personal data processing includes, but is not limited to:

- collection;
- recording;
- systematization;

- accumulation;
- storage;
- clarification (update, change);
- retrieval;
- use;
- transfer (distribution, provision, access);
- depersonalisation;
- blocking;
- removing;
- destruction;

automated personal data processing means processing of personal data using computer equipment;

distribution of personal data means actions aimed at disclosing personal data to an undetermined number of persons.

provision of personal data means actions aimed at disclosing personal data to a certain person or a certain set of persons;

personal data blocking means temporary personal data processing suspension (unless processing is necessary to clarify personal data);

destruction of personal data means actions that result in the impossibility of restoring the content of personal data in the personal data information system and (or) result in destruction of the personal data physical media;

depersonalization of personal data means actions that make it impossible to determine the ownership of personal data to a specific subject of personal data without the use of additional information;

personal data information system means a set of personal data contained in databases, and information technologies and technical means ensuring their processing;

cross-border transfer of personal data is the transfer of personal data to the territory of a foreign state to the authority of a foreign state, to a foreign individual or to a foreign legal entity.

1.8. Basic rights and obligations of the Organization.

1.8.1. The Organization has the right to:

1) independently determine the set and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Law on Personal Data and regulatory legal acts adopted in accordance therewith, unless otherwise provided by the Law on Personal Data or other federal laws;

2) entrust the personal data processing to another entity with the consent of the personal data subject, unless otherwise provided by the federal law, based on the agreement concluded with such an entity. A person who processes personal data on behalf of the Organization shall comply with the principles and rules for processing personal data provided for by the Law on Personal Data;

3) If the personal data subject withdraws consent to personal data processing, the Organization shall have the right to continue processing personal data without the consent of the personal data subject if there are grounds specified in the Law on Personal Data.

1.8.2. The Organization shall:

1) organize the processing of personal data in accordance with the Law on Personal Data;

2) respond to requests and inquiries from personal data subjects and their legal representatives in accordance with the Law on Personal Data;

1.9. Basic rights of the personal data subject (User). The personal data subject shall have the right to:

1) receive information regarding the processing of his personal data, with the exception of cases provided for by federal laws. The information is provided to the personal data subject by the Organization in an accessible form, and it shall 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 is established by the Law on Personal Data;

2) demand that the Organization clarify his/her personal data, block it or

destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as take measures prescribed by law to protect its rights;

3) to appeal in court against unlawful actions or inaction of the Organization in the processing of his/her personal data.

1.10. Fulfillment of the requirements hereof shall be controlled by an authorized person responsible for organizing the processing of personal data at the Organization.

1.11. Responsibility for violation of the legislation of the Russian Federation and the regulations of the Organization on processing and protection of personal data is determined in accordance with the legislation of the Russian Federation.

2. Purposes of collecting personal data

2.1. The processing of personal data is limited to the achievement of specific, predetermined and legitimate goals. Processing of personal data that is incompatible with the purposes of collecting personal data is not allowed.

2.2. Only personal data that meets the purposes of their processing is subject to processing.

2.3. The Organization processes personal data for the following purposes:

- ensuring compliance with the Constitution of the Russian Federation, federal laws and other regulatory legal acts of the Russian Federation, local regulatory acts of the Organization;

- carrying out its activities in accordance with the Articles of Association of the Organization;

- implementation of civil law relations;

- provision of information, consulting and other services to Users of the website;

- registration for events held by the Organization;

- provision of services to Users (access to the mobile application, access to the event venue, creation and printing of passes/badges);

- sending consultations, answers to applicants using means of communication and contact details specified by them;

- collection, qualitative and quantitative analysis and impersonal generalization in the form of statistical reports of information on website traffic and requested consultations;

- carrying out activities and research aimed at improving the quality of advice provided; promotion of goods and services on the market through direct contacts with potential consumers by means of communication;

- promotion of the Organization's services on the market by making direct contacts with a potential consumer through an application;

- communication with the User of the website, when the User contacts the Organization, including by e-mail, by phone, at the address, through the application.

2.4. Users of the website agree that the Organization may also use their personal data to:

- identification of the party within the framework of the services provided;

- provision of services and customer support at the request of Users;

- improving the quality of services, ease of use, development and improvement of the website, elimination of technical problems or security problems;

- analysis to expand and improve services, content and advertising of services;

- informing Users about services, events, targeted marketing, updating services and promotional offers based on Users' information preferences;

- sending news materials;

- targeting of advertising materials.

- sending individual marketing messages via e-mail, calls and SMS;

- conducting statistical and other studies.

3. Legal basis of personal data processing

3.1. The legal basis for the personal data processing is a set of regulatory legal acts, pursuant to which and in accordance with which the Organization

processes personal data, including:

- Constitution of the Russian Federation;
- Civil Code of the Russian Federation;
- Labor Code of the Russian Federation;
- Tax Code of the Russian Federation;
- Federal Law of 08.02.1998 No. 14-FZ "On Limited Liability Companies";
- Federal Law of 06.12.2011 No. 402-FZ "On Accounting";
- Federal Law of 15.12.2001 No. 167-FZ "On Mandatory Pension Insurance in the Russian Federation";
- other regulatory legal acts governing relations related to the activities of the Organization.

3.2. The legal basis for the personal data processing is also:

- Articles of Association of the Organization;
- contracts concluded between the Organization and personal data subjects;
- consent of personal data subjects to the processing of their personal data.

4. Scope and categories of processed personal data, categories of personal data subjects

4.1. The content and scope of personal data processed must comply with the stated purposes of processing provided for in Section 2 of this Policy. The processed personal data should not be redundant in relation to the stated purposes of their processing.

4.2. The organization may process personal data of the following categories of personal data subjects.

4.2.1. Clients and counterparties of the Organization (individuals):

- last name, first name, patronymic;
- address of registration at the place of residence;
- contact details
- job title;
- taxpayer identification number;
- bank account number;
- other personal data provided by customers and counterparties (individuals) necessary for the

conclusion and execution of contracts.

4.2.2. Representatives (employees) of customers and counterparties of the Organization (legal entities):

- last name, first name, patronymic;
- contact details
- job title;
- other personal data provided by representatives (employees) of customers and counterparties necessary

for the conclusion and execution of contracts.

4.2.3. Participants of the events:

- last name, first name, patronymic;
- date of birth;
- gender;
- place of birth;
- country of residence;
- citizenship
- type of document, series and number of the identity document (passport);
- company name;
- job title;
- phone number;
- email address;
- photo;

• an electronic image (scanned copy) of the identity document, as well as the information contained in such an electronic image.

4.2.4. Participants of the contest of projects in the field of physical culture and sports "Sports Startup":

- last name, first name, patronymic;

- contact details (contact phone number, email address);
- social media page.

4.3. The Organization processes biometric personal data (information that characterizes the physiological and biological characteristics of a person, on the basis of which it is possible to establish his identity) in accordance with the legislation of the Russian Federation.

4.4. The Organization does not process special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, health status, intimate life, except as otherwise provided by the legislation of the Russian Federation.

4.5. The Organization does not make a cross-border (to the territory of a foreign state to the authority of a foreign state, a foreign individual or a foreign legal entity) transfer of personal data.

4.6. The Organization does not place personal data in publicly available sources without obtaining the User's consent to the processing of personal data permitted for distribution.

4.7. The Organization's website collects, accesses and uses for the purposes specified in the Policy personal data of Users, technical and other information related to Users.

Technical information is not personal data. The Organization uses cookies that allow identifying the User. Cookies are text files available to the Organization to process information about the User's activity, including information about which pages the User visited and the time the User spent on the page. The user can disable the use of cookies in the browser settings.

5. Principles and terms of personal data processing

5.1. The processing of personal data is carried out by the Organization in accordance with the requirements of the legislation of the Russian Federation.

5.2. The personal data shall be processed with the consent of the personal data subjects to the processing of their personal data, as well as without it in the cases provided for by the legislation of the Russian Federation.

The user of the website agrees to the processing of his personal data by sending an application (any written request containing personal data).

5.3. The organization carries out both automated and non-automated processing of personal data.

5.4. Employees of the Organization whose official duties include the processing of personal data are allowed to process personal data.

5.5. The processing of personal data is carried out by:

- receiving personal data orally and in writing directly from the subjects of personal data;
- obtaining personal data from publicly available sources;
- entering personal data into the registers and information systems of the Organization;
- using other methods of processing personal data.

5.6. All personal data processed by the Organization are confidential, strictly protected information in accordance with the law. It is not allowed to disclose personal data to third parties and distribute personal data without the consent of the subject of personal data, unless otherwise provided by federal law or clause 1.5.3. of the Policy.

5.7. The transfer of personal data to the bodies of inquiry and investigation, the Federal Tax Service, the Pension Fund of the Russian Federation, the Social Insurance Fund, the Federal Security Service of the Russian Federation, the Federal Guard Service of the Russian Federation and other authorized executive bodies and organizations is carried out in accordance with the requirements of the legislation of the Russian Federation.

5.8. The Organization shall take the necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access thereto, destruction, alteration, blocking, distribution and other unauthorized actions, including:

- adopts local regulations and other documents regulating relations in the field of processing and protection of personal data;
- appoints persons responsible for organizing the processing of personal data;

- creates the necessary conditions for working with personal data;
- obtains the consent of the personal data subjects to the processing of their personal data, except as provided for by the legislation of the Russian Federation;
- stores personal data in conditions under which their security is ensured and unauthorized access to them is excluded;
- acquaints the employees of the Organization directly involved in the processing of personal data with the provisions of the legislation of the Russian Federation on personal data, including the requirements for the protection of personal data, documents defining the operator's policy regarding the processing of personal data, local acts on the processing of personal data;
- takes other measures provided for by the legislation of the Russian Federation in the field of personal data.

5.9. The Organization shall keep personal data in a form that allows to determine the personal data subject, no longer than the purpose of processing personal data requires, if the storage period for personal data is not established by federal law, by an agreement.

5.10. When collecting personal data, including through the information and telecommunications network Internet, the Organization shall provide recording, systematization, accumulation, storage, clarification (update, change), extraction of personal data of citizens of the Russian Federation using databases located in the Russian Federation, except for cases specified in the Law on Personal Data.

6. Updating, correction, deletion and destruction of personal data, responses to requests from subjects for access to personal data

6.1. Confirmation of the fact of personal data processing by the Organization, legal grounds and purposes of personal data processing, as well as other information specified in Part 7 of Art. 14 of the Law on Personal Data, are provided by the Organization to the personal data subject or his representative when applying or when receiving a request from the personal data subject or his representative.

The information provided does not include personal data relating to other personal data subjects, unless there are legal grounds for disclosing such personal data.

The request shall contain:

- the number of the main identity document of the personal data subject or his representative, information on the date of issue of the specified document and the issuing authority;
- information confirming the participation of the subject of personal data in relations with the Organization (contract number, date of conclusion of the contract, conditional verbal designation and (or) other information), or information otherwise confirming the fact of processing personal data by the Organization;
- signature of the personal data subject or his/her representative.

The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

If the application (request) of the subject of personal data does not reflect all the necessary information in accordance with the requirements of the Law on Personal Data or the subject does not have the rights of access to the requested information, then a reasoned refusal is sent to him.

The right of the personal data subject to access his personal data may be limited in accordance with Part 8 of Art. 14 of the Law on Personal Data, including if the access of the personal data subject to his personal data violates the rights and legitimate interests of third parties.

6.2. In the event that inaccurate personal data is detected when the personal data subject or his representative applies or at their request, the Organization blocks personal data relating to this personal data subject from the moment of such application or receipt of the specified request for the verification period, unless the blocking of personal data violates the rights and legitimate interests of the personal data subject or third parties.

In case of confirmation of the fact of inaccuracy of personal data, the Organization, on the basis of information provided by the subject of personal data or his representative, or other necessary documents, clarifies personal data within seven working days from the date

submission of such information and removes the blocking of personal data.

6.3. In case of detection of unlawful processing of personal data when applying (requesting) the subject of personal data or his representative, the Organization blocks unlawfully processed personal data relating to this subject of personal data from the moment of such application or receipt of the request.

6.4. Upon achievement of the goals of processing personal data, as well as if the personal data subject revokes consent to their processing, personal data are subject to destruction if:

- otherwise is not provided for by the contract, the party to which, the beneficiary or the guarantor of which the personal data subject is;
- the Organization is not entitled to process without the consent of the personal data subject on the grounds provided for by the Law on Personal Data or other federal laws;
- otherwise is not provided for by another agreement between the Organization and the personal data subject.

7. Additional terms

7.1. The website may contain links to third-party websites and services that are not controlled by the Organization. The Organization is not responsible for the security or confidentiality of any information collected by third-party websites or services.

7.2. The Organization has the right to amend this Policy unilaterally. The new Policy comes into force from the moment of its posting, unless otherwise provided by the new version of the Policy.

7.3. Continued use of the Website after making such changes confirms the User's consent to such changes.