

# PERSONAL DATA PROCESSING POLICY

## 1. General Provisions

This Personal Data Processing Policy has been developed in accordance with Federal Law of the Russian Federation No. 152-FZ dated July 27, 2006 «On Personal Data.» (hereinafter referred to as the Personal Data Law) and determines the procedure for processing personal data and measures to ensure the security of personal data taken by the Ark Foundation for Support and Development of the Jewish Cinema (hereinafter referred to as the Operator).

1.1. The operator sets as its most important goal and condition for the implementation of its activities to procure the protection of a person's rights and liberties while processing his/her personal data, including the right to privacy, personal and family secrecy

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

## 2. Basic Terms of the Policy

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

2.2. Blocking of personal data — the temporary cessation of personal data processing (except for the cases when the processing is needed for personal data specification).

2.3. Website — a set of graphic and information materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address <https://mjff.ru>.

2.4. Personal data information system — a database that contains personal data as well as information technologies and hardware used for data processing.

2.5. Anonymization of personal data — actions performed on personal data that do not permit the identity of the individual concerned to be verified solely from such anonymized data.

2.6. Personal data processing — any action (operation) or a combination of actions (operations) performed both automatically and manually with personal data, including collection, recording, arrangement, accumulation, storage, specification (updating, changing), extraction, use, distribution (including transfer), anonymizing, blocking and destruction of personal data.

2.7. Operator — state agency, municipal authority, legal entity or individual who independently or in cooperation with other entities organizes and/or processes personal data as well as determines the purposes and scope of personal data processing.

2.8. Personal data — any information referring directly or indirectly to a particular or identified User of the website <https://mjff.ru>.

2.9. Personal data permitted by the subject of personal data for distribution — personal data, access of an unlimited number of persons to which is provided by the subject of personal data by giving consent to the processing of personal data permitted by the subject of personal data for distribution in the manner prescribed by the Law on Personal Data (hereinafter — personal data permitted for distribution).

2.10. User — any visitor to the website <https://mjff.ru>.

2.11. Provision of personal data — actions aimed at disclosing personal data to a certain person or a certain circle of persons.

2.12. Distribution of personal data — actions related to making the data available to indefinite range

of persons (transfer of personal data) or at acquaintance with the personal data of an unlimited number of persons, including the distribution of personal data in the media, posting on information and telecommunication networks or providing access to personal data in any other way.

2.13. Cross-border transfer of personal data — cross-border transfer of personal data to a foreign state agency, foreign legal entity or individual located in a foreign state.

2.14. Destruction of personal data — actions performed on personal data contained in the respective database that prevent such data from being restored and (or) actions aimed at the physical destruction of the tangible medium of personal data.

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

3.1. The operator has the right to:

- receive reliable information and / or documents containing personal data from the subject of personal data;
- if the subject of personal data withdraws consent to the processing of personal data, the Operator has the right to continue processing personal data without the consent of the subject of personal data if it is justified by the Law on Personal Data;
- independently determine the composition and list of measures which are necessary and sufficient to ensure the fulfillment of obligations stipulated by the Law on Personal Data and regulatory legal acts adopted in accordance with it, unless otherwise is provided by the Law on Personal Data or other federal laws.

3.2. The operator is obliged to:

- provide the subject of personal data with information regarding the processing of their personal data upon their request;
- organize the processing of personal data in the manner prescribed by the current legislation of the Russian Federation;
- respond to requests and inquiries from subjects of personal data and their legal representatives in accordance with the requirements of the Law on Personal Data;
- pass the necessary information to the authorized body for the protection of the rights of subjects of personal data at their request within 30 days from the date of receipt of such a request;
- publish or otherwise provide unrestricted access to this Personal Data Processing Policy
- take legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, alteration, blocking, copying, provision, dissemination of personal data, as well as other illegal actions related to personal data;
- stop the transfer (dissemination, provision, access) of personal data, stop processing and erase personal data according to the Law on Personal Data;
- perform other duties provided for by the Law on Personal Data.

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

4.1. Personal data subjects have the right to:

- receive information regarding the processing of their personal data, with the exception of cases provided for by federal laws. The information is provided to the subject of personal data by the Operator in an accessible form, and it should not contain personal data relating to other subjects of personal data, unless there are legal grounds for disclosing such personal data. The list of information and the procedure for its obtaining is established by the Law on Personal Data;
- require the operator to clarify their personal data, block or erase them if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as take legal measures to protect their rights;

- stipulate prior consent when processing personal data in order to promote goods, works and services on the market;
  - withdraw consent to the processing of personal data;
  - appeal against the unlawful actions or inaction of the Operator when processing their personal data to the authorized body for the protection of the rights of subjects of personal data or in court;
  - perform other duties stipulated by the legislation of the Russian Federation.
- 4.2. Subjects of personal data are obliged to:
- provide the Operator with their reliable data;
  - inform the Operator about the improvement (update, change) of their personal data.
- 4.3. Those who have passed inaccurate personal information or information about another subject of personal data without their consent to the Operator, bear responsibility as set forth by the law of the Russian Federation.

## **5. The operator can process the following User's personal data**

5.1. Surname, name, patronymic.

5.2. Email address.

5.3. Also, the site collects and processes anonymized data about visitors (including cookies) using Internet statistics services (Yandex. Metrika and Google Analytics and others).

5.4. The abovementioned data are united by the general concept of Personal data hereinafter in the text of the Policy.

5.5. The processing of special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, intimate life is not carried out by the Operator.

5.6. The processing of personal data permitted for distribution from among the special categories of personal data specified in Part 1 of Art. 10 of the Law on Personal Data is allowed on condition that the prohibitions and conditions in Art. 10.1 of the Law on Personal Data are followed.

5.7. User's consent to the processing of personal data authorized for distribution is issued separately from other consents to the processing of their personal data. In this case, the conditions provided for in Art. 10.1 of the Law on Personal Data must be followed. The requirements for the content of such consent are established by the authorized body for the protection of the rights of subjects of personal data.

5.7.1 Users provide their consent to the processing of their personal data authorized for distribution to the Operator directly.

5.7.2 The operator is obliged to publish information on the processing conditions, as well as inform about the prohibitions and conditions for the processing of personal data permitted for distribution by an unlimited number of persons no later than three working days from the moment of receipt of the specified consent of the User.

5.7.3 The transfer (distribution, provision, access) of personal data permitted by the subject of personal data for distribution must be stopped at any time at the request of the subject of personal data. This requirement should include the last name, first name, patronymic (if any), contact information (phone number, email address or postal address) of the subject of personal data, as well as a list of personal data, the processing of which must be terminated. The personal data specified in this requirement can be processed only by the Operator to whom it is passed.

5.7.4 Consent to the processing of personal data permitted for distribution is terminated from the moment the Operator receives the request specified in clause 5.7.3 of this Policy in relation to the processing of personal data.

## **6. Principles of Personal Data Processing**

6.1. Personal data processing is carried out on a legal and equitable basis

6.2. Personal data processing is restricted by specific pre-determined and legal purposes. It is not allowed to process personal data for the purpose which is incompatible with the purpose of personal data collection.

6.3. It is not allowed to combine the data bases containing personal data which are processed for incompatible purposes.

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

6.5. The scope and character of personal data to be processed must comply with the intended purposes of such data processing. The processed personal data cannot be irrelevant to the declared purposes of their processing.

6.6. In the course of personal data processing it is necessary to ensure the personal data accuracy, their sufficiency and in case of need their compatibility with the processing purposes. Operators take the required measures or ensure deleting or specifying the incomplete or inaccurate data.

6.7. Personal data is stored in a form that allows verification of the identity of personal data subjects only to the extent necessary for the processing purposes unless the personal data storage time is not established by federal laws, agreements concluded with personal data subjects as a beneficiary or guarantor party. Personal data is destroyed or depersonalized upon achieving the set goals as well as when such goals cease to be relevant unless otherwise stipulated by federal law.

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

7.1. The purpose of User's personal data processing:

- informing the User by sending emails;
- providing the User with access to services, information and / or materials contained on the website <https://mjff.ru>.

7.2. The Operator has the right to send notifications about new products and services, special offers and various events to the User. The user can always refuse to receive informational messages by sending an email to the Operator at [info@arkfund.org](mailto:info@arkfund.org) with the note "Refusal of notifications about new products and services and special offers".

7.3. Anonymized data of Users collected with the help of Internet statistics services are used to collect information about the actions of Users on the website, in order to improve the quality of the site and its content.

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

8.1. The legal grounds for the processing of personal data by the Operator are:

- Federal Law dated July 27, 2006 No.149-FZ «On Information, Information Technologies and Information Protection»;
- federal laws, other regulations in the field of personal data protection;
- the consent of the Users to the processing of their personal data, to the processing of personal data permitted for distribution.

8.2. The Operator processes the User's personal data provided that they are filled in and / or sent by the User independently through special forms located on the website <https://mjff.ru> or sent to the Operator via e-mail. By filling out the appropriate forms and / or sending their personal data to the Operator the User agrees with this Policy.

8.3. The Operator processes anonymized data about the User if it is allowed in the settings of the User's browser (the storage of cookies and the use of JavaScript technology are enabled).

8.4. The subject of personal data decides on the provision of their personal data and gives consent freely, of their own free will and in their interest.

## **9. Conditions of Personal Data Processing**

- 9.1. Processing of personal data is carried out with the consent of the data subject to the processing of his personal data.
- 9.2. Personal data processing is required for achieving the purposes stipulated by an international agreement of the Russian Federation or by a law, or for exercise and fulfillment of functions, powers and obligations imposed on operators by the Russian Federation law.
- 9.3. Personal data processing is required for administration of justice or enforcement of a judicial act or an act of another body or official which are enforceable in accordance with the legislation of the Russian Federation concerning enforcement proceedings.
- 9.4. Personal data processing is required for performance of an agreement to which a personal data subject is a party or under which the data subject is a beneficiary or surety, or for conclusion of an agreement on the initiative of a personal data subject or an agreement under which a personal data subject shall be a beneficiary or surety.
- 9.5. Processing of personal data is required for realization of the rights and legitimate interests of an operator or third parties or for the attainment of socially significant objectives, provided that this not cause the rights and freedoms of the personal data subject to be violated.
- 9.6. Public access to the personal data being processed has been granted by or at the request of the personal data subject (hereinafter referred to as “public personal data”).
- 9.7. The personal data being processed are subject to publication or compulsory disclosure in accordance with federal laws.

## **10. The procedure for collecting, storing, transferring and other types of processing of personal data**

The security of personal data processed by the Operator is ensured through the implementation of legal, organizational and technical measures necessary to fully comply with the requirements of the current legislation in the field of personal data protection.

- 10.1. The operator ensures the safety of personal data and takes all possible measures to exclude access to personal data of unauthorized persons.
- 10.2. The User's personal data will never, under any circumstances, be transferred to third parties, except for cases related to the implementation of current legislation or if the subject of personal data has given consent to the Operator to transfer data to a third party to fulfill obligations under a civil contract.
- 10.3. If there are inaccuracies in personal data, the User can update them independently by sending a notification to the Operator to the e-mail address: [info@arkfund.org](mailto:info@arkfund.org) marked «Updating personal data».
- 10.4. The period for processing personal data is determined by the achievement of the purposes for which the personal data were collected, unless another period is provided for by the contract or current legislation.

The user can at any time revoke their consent to the processing of personal data by e-mailing the Operator to the email address of the Operator [info@arkfund.org](mailto:info@arkfund.org) marked “Revocation of consent to the processing of personal data”.

- 10.5. All information that is collected by third-party services, including payment systems, communication facilities and other service providers, is stored and processed by the specified persons (Operators) in accordance with their User Agreement and Privacy Policy. The subject of personal data and / or the User is obliged to independently familiarize themselves with these

documents in a timely manner. The operator is not responsible for the actions of third parties, including the service providers specified in this clause.

10.6. The prohibitions established by the subject of personal data on the transfer (except for granting access), as well as on the processing or processing conditions (except for gaining access) of personal data permitted for distribution do not apply in cases of processing personal data in the state, public and other public interests determined by the law of the Russian Federation.

10.7. When processing personal data, the operator ensures the confidentiality of personal data.

10.8. The operator stores personal data in a form that makes it possible to determine the subject of personal data no longer than the purpose of processing personal data requires, unless the storage period for personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor.

10.9. A condition for terminating the processing of personal data may be the achievement of the purposes of processing personal data, the expiration of the consent of the subject of personal data or withdrawal of consent by the subject of personal data, as well as the identification of illegal processing of personal data.

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

11.1. The operator carries out the collection, recording, systematization, accumulation, storage, clarification (update, modification), extraction, use, transfer (distribution, providing access), depersonalization, blocking, deletion and destruction of personal data.

11.2. The operator carries out automated processing of personal data with the receipt and / or transmission of the information received via information and telecommunication networks or without it.

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

12.1. An operator shall be obliged to satisfy itself that the foreign state into whose territory personal data are to be transferred provides adequate protection of the personal data subjects' rights before commencing the cross-border transfer of personal data.

12.2. The cross-border transfer of personal data into the territories of foreign states which do not provide an adequate protection of the personal data subjects' rights may be carried out only if there is a written consent of the subject of personal data to the cross-border transfer of his personal data and / or for the purpose of the performance of a contract to which the personal data subject is a party

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

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

## **14. Final Provisions**

14.1. The user can receive any clarifications on issues regarding the processing of their personal data by contacting the Operator via e-mail [info@arkfund.org](mailto:info@arkfund.org).

14.2. This document will reflect any changes in the personal data processing policy by the Operator. The policy is valid without limit of time until it is replaced by a new version.

14.3. The current version of the Policy is freely available on the Internet at <https://mjff.ru>.