

Personal Data Processing Policy

1. General Provisions

This personal data processing policy defines the procedure for processing personal data and the measures to ensure the security of personal data taken by Sentiro (hereinafter referred to as the Operator).

1.1. The Operator's primary goal and condition for carrying out its activities is the observance of human and civil rights and freedoms when processing their personal data, including the protection of the right to privacy, personal and family confidentiality.

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

2. Basic concepts used in the Policy

2.1. Automated processing of personal data means the processing of personal data using computer technology.

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

2.3. Website means a collection of graphic and informational materials, as well as computer programs and databases, making them available online

at the address <https://sentiro.pro>

2.4. Personal data information system means the collection of personal data contained in databases and the information technologies and technical means that support their processing.

2.5. Anonymization of personal data means actions that make it impossible to determine, without the use of additional information, the attribution of personal data to a specific User or other personal data subject.

2.6. Personal data processing — any action (operation) or set of actions (operations) performed with or without automated means with personal data,

including the collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, or destruction of personal data.

2.7. Operator — a government agency, municipal body, legal entity, or individual that, independently or jointly with other persons, organizes and/or carries out the processing of

personal data, and 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 an identified or identifiable User of the website <https://sentiro.pro>

2.9. Personal data permitted for distribution by the personal data subject are personal data to which the general public has been granted access by the personal data subject by consenting to the processing of the personal data, which the personal data subject has permitted for distribution in accordance with the procedure established by the Law on Personal Data (hereinafter referred to as personal data permitted for distribution).

2.10. User — any visitor to the website <https://sentiro.pro>.

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 making the general public familiar with the personal data,

including disclosing personal data in the media, posting it on information and telecommunications networks, or providing access to personal data by any other means.

2.13. Cross-border transfer of personal data is the transfer of personal data to a foreign government, foreign individual, or foreign legal entity.

2.14. Destruction of personal data is any action that results in the irreversible destruction of personal data, making it impossible to restore the contents of the personal data in a personal data information system and/or the destruction of physical media containing the 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 personal data subject;

— if the personal data subject revokes consent to the processing of personal data, or if the personal data subject requests termination of the processing of personal data, the Operator has the right to continue

processing the personal data without the consent of the personal data subject, provided there are grounds specified in the Personal Data Law;

— independently determine the composition and list of measures necessary and sufficient

to ensure the fulfillment of obligations stipulated by the Personal Data Law and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law

or other federal laws.

3.2. The Operator is obligated to:

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

— organize the processing of personal data in accordance with the procedure established by current legislation;

— respond to inquiries and requests from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;

— notify the authorized body for the protection of the rights of personal data subjects, upon request of such body, of the necessary information within 10 days of receipt of such 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 unauthorized or accidental access, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal 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 cases stipulated by the Law on Personal Data;

— fulfill other obligations stipulated by the Law on Personal Data.

4. Basic rights and obligations of personal data subjects

4.1. Personal data subjects have the right to:

— receive information regarding the processing of their personal data, except in cases stipulated by federal laws. Information is provided to the personal data subject by the Operator in an accessible form and must not contain personal data related to other personal data subjects, except in cases where there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Law on Personal Data;

— request that the Operator clarify their personal data, block it, or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained, or is not necessary for the stated purpose of processing, and also take measures stipulated by law to protect their rights;

— require prior consent when processing personal data for the purpose of promoting goods,

works, and services;

— revoke consent to the processing of personal data, as well as request that the processing of personal data be terminated;

— appeal to the authorized body for the protection of the rights of personal data subjects or in court against the illegal actions or inactions of the Operator during the processing of their personal data;

— exercise other rights provided by law.

4.2. Personal data subjects are obligated to:

— provide the Operator with accurate information about themselves;

— notify the Operator of any clarifications (updates, changes) to their personal data.

4.3. Persons who provide the Operator with inaccurate information about themselves, or information about another personal data subject, without the latter's consent shall be liable in accordance with the law.

5. Principles of personal data processing

5.1. Personal data shall be processed lawfully and fairly.

5.2. Personal data shall be processed only to achieve specific, predetermined, and legitimate purposes. Processing of personal data incompatible with the purposes for which it was collected is prohibited.

5.3. Databases containing personal data processed for incompatible purposes shall not be combined.

5.4. Only personal data that is relevant to the purposes for which it is processed shall be processed.

5.5. The content and volume of personal data processed correspond to the stated purposes of processing. Processed personal data shall not be excessive in relation to the stated purposes of processing.

5.6. When processing personal data, the accuracy, sufficiency, and, where necessary, relevance of the personal data in relation to the purposes for which it is processed shall be ensured. The Operator shall take the necessary measures and/or ensure their implementation to delete or clarify incomplete or inaccurate data.

5.7. Personal data is stored in a form that allows identification of the data subject for no longer than required for the purposes of processing the personal data, unless the storage period is

established by federal law or an agreement to which the data subject is a party, beneficiary, or guarantor. Processed personal data is destroyed or anonymized once the processing purposes are achieved or when these purposes are no longer necessary, unless otherwise provided by federal law.

6. Purposes of personal data processing

Purpose of processing: Providing the User with access to services, information, and/or materials contained on the website.

Personal data: email address, phone numbers, Telegram.

Legal basis: the Operator's statutory (founding) documents.

Types of personal data processing: collection, recording, systematization, accumulation, storage, destruction, and depersonalization of personal data. Sending informational emails.

7. Terms of personal data processing

7.1. Personal data processing is carried out with the consent of the personal data subject to the processing of their personal data.

7.2. The processing of personal data is necessary to achieve the purposes stipulated by an international treaty or law, to exercise the functions, powers, and duties imposed on the operator by law.

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

7.4. The processing of personal data is necessary for the performance of an agreement to which the personal data subject is a party, beneficiary, or guarantor, as well as for the conclusion of an agreement at the initiative of the personal data subject or an agreement under which the personal data subject will be a beneficiary or guarantor.

7.5. The processing of personal data is necessary to exercise 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. 7.6. The processing of personal data is performed for which access to the general public is granted by the personal data subject or at their request (hereinafter referred to as publicly available personal data).

7.7. The processing of personal data is performed for personal data subject to publication or mandatory disclosure in accordance with federal law.

8. Procedure for collecting, storing, transferring, and otherwise processing personal data

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

8.1. The Operator ensures the security of personal data and takes all possible measures to prevent unauthorized persons from accessing it.

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

8.3. If inaccuracies in personal data are discovered, the User may update them independently by sending a notification to the Operator's email address support@sentiro.pro with the subject line "Updating personal data."

8.4. The processing period for personal data is determined by the achievement of the purposes for which the personal data was collected, unless another period is provided for by the contract or current legislation. The User may revoke their consent to the processing of personal data at any time by sending a notification to the Operator by email to support@sentiro.pro with the subject line "Withdrawal of Consent to the Processing of Personal Data."

8.5. All information collected by third-party services, including payment systems, communication tools, and other service providers, is stored and processed by the specified parties (Operators) in accordance with their User Agreement and Privacy Policy. The subject of the personal data and/or the specified documents. The Operator is not responsible for the actions of third parties, including the service providers specified in this clause.

8.6. Prohibitions on the transfer (except for granting access), as well as on the processing or processing conditions (except for obtaining access) of personal data permitted for distribution, established by the personal data subject, do not apply in cases where personal data is processed in state, public, or other public interests defined by law.

8.7. When processing personal data, the Operator ensures the confidentiality of the personal data.

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

8.9. Termination of personal data processing may be conditional upon the achievement of the personal data processing purposes, expiration of the personal data subject's consent, revocation of consent by the personal data subject, or a request to cease processing the personal data, as well as the detection of unlawful processing of personal data.

9. List of actions performed by the Operator with received personal data

9.1. The Operator collects, records, systematizes, accumulates, stores, clarifies (updates, modifies), retrieves, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes, and destroys personal data.

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

10. Cross-border transfer of personal data

10.1. Prior to commencing any cross-border transfer of personal data, the operator is obligated to notify the authorized body for the protection of the rights of personal data subjects of its intention to carry out the cross-border transfer of personal data (such notification is sent separately from the notification of intent to process personal data).

10.2. Prior to submitting the above notification, the operator is obligated to obtain relevant information from the authorities of the foreign state, foreign individuals, and foreign legal entities to whom the cross-border transfer of personal data is planned.

11. Confidentiality of Personal Data

The Operator and other persons with access to personal data are obligated not to disclose or distribute personal data to third parties without the consent of the personal data subject, unless otherwise provided by federal law.

12. Final Provisions

12.1. The User may obtain any clarification on any questions regarding the processing of their personal data by contacting the Operator by email at support@sentiro.pro.

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

12.3. The current version of the Policy is publicly available online at <https://sentiro.pro>.