

# **POLICY OF INOSTUDIO GAMES FOR PERSONAL DATA PROCESSING**

## **1. General Provisions**

This Policy regarding the processing of personal data (hereinafter - the Policy) is developed in accordance with the Federal Law of 27.07.2006. No. 152-FL "On Personal Data" (hereinafter - FL-152).

The policy defines the procedure for the processing of personal data and measures to ensure the security of personal data in INOSTUDIO GAMES (hereinafter referred to as the Operator) in order to protect the rights and freedoms of a person and a citizen in the processing of his personal data, including protection of rights to privacy, personal and family secret.

Additions (changes) to the content Policies can be made at any time by an order of the CEO of the Operator.

The following basic concepts are used in the Policy:

*Automated processing of personal data* - processing of personal data by means of computer facilities.

*Blocking of personal data* - temporary termination of the processing of personal data (except for cases when processing is necessary for the specification of personal data).

*Information system of personal data* - a set of personal data contained in databases, and providing them with processing of information technologies and technical means.

*The depersonalization of personal data* - an action, as a result of which it is impossible to determine the belonging of personal data to a specific subject of personal data without using additional information.

*Personal data processing* - any action (operation) or a set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, updating (updating, modification), extraction, Use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

*Operator* - a state body, a municipal body, a legal entity or an individual, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as defining the purposes of processing personal data, the composition of personal data subject to processing, the actions (operations) performed with personal data.

*Personal data* - any information related to a directly or indirectly defined or determined individual (subject of personal data).

*Provision of personal data* - actions aimed at disclosing personal data to a particular person or a certain circle of persons; *Distribution of personal data* - actions aimed at the disclosure of personal data to an indeterminate circle of persons (transfer of personal data) or for acquaintance with personal data of an unlimited number of persons, including promulgation of personal data in the mass media, placement in information and telecommunication networks or provision of access to Personal data in any other way.

*Cross-border transfer of personal data* - the transfer of personal data to the territory of a foreign state to the authority of a foreign state, to a foreign physical or foreign legal entity.

*Destruction of personal data* - actions, as a result of which it is impossible to restore the contents of personal data in the information system of personal data and (or) the result of which material data carriers of personal data are destroyed.

The Company is obliged to publish or otherwise provide unlimited access to this Privacy Policy in accordance with Part 2 of Art. 18.1. FL-152.

## **2. Principles and terms of personal data processing**

### 2.1 Principles of processing personal data

The processing of personal data by the Operator is carried out on the basis of the following principles:

- Legality and fair basis;
- Limits the processing of personal data to the achievement of specific, pre-determined and legitimate purposes;
- Preventing the processing of personal data incompatible with the purposes of collecting personal data;
- Prevention of the unification of databases containing personal data, processing of which is carried out for purposes incompatible with each other;
- Processing only those personal data that meet the purposes of their processing;
- Conformity of the content and volume of processed personal data to the stated processing objectives;
- Preventing the processing of personal data that is redundant in relation to the stated purposes of processing them;
- Ensuring the accuracy, adequacy and relevance of personal data in relation to the purposes of processing personal data;
- Destruction or depersonalization of personal data upon the achievement of the objectives of their processing or in the event of a loss of the need to achieve these goals, if the Operator cannot eliminate the admitted violations of personal data, unless otherwise provided by federal law.

### 2.2 Terms of personal data processing

The operator performs processing of personal data in the presence of at least one of the following conditions:

- Processing of personal data is carried out with the consent of the subject of personal data to the processing of his personal data;
- The processing of personal data is necessary to achieve the goals stipulated by the international treaty of the Russian Federation or the law for the implementation and performance of functions, powers and duties imposed by the legislation of the Russian Federation on the operator;
- The processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another body or official subject to enforcement in accordance with the law of the Russian Federation on enforcement proceedings;

- The processing of personal data is necessary for the performance of a contract to which the subject of personal data is a party or a beneficiary or guarantor, as well as for the conclusion of a contract on the initiative of a personal data subject or a contract whereby the personal data subject will be a beneficiary or a guarantor;
- The processing of personal data 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 subject of personal data are not thereby violated;
- Processing of personal data, access of an unlimited circle of persons to which is provided by the subject of personal data or at his request (hereinafter - publicly available personal data);
- Processing of personal data subject to publication or mandatory disclosure in accordance with federal law.

### 2.3 Confidentiality of personal data

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

### 2.4. Publicly available sources of personal data

In order to provide information, the Operator can create public sources of personal data of subjects, including directories and address books. In the public sources of personal data with the written consent of the subject may include his surname, name, patronymic, date and place of birth, position, contact phone numbers, e-mail address and other personal data reported by the subject of personal data.

Information about the subject must be deleted at any time from the publicly available sources of personal data at the request of the entity or by decision of the court or other authorized state bodies.

### 2.5 Special categories of personal data

The processing by the Operator of special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, health status, intimate life is allowed in cases where:

- The subject of personal data has given his consent in writing to the processing of his personal data;
- Personal data is made publicly available by the subject of personal data;
- The processing of personal data is carried out in accordance with the legislation on state social assistance, labor legislation, the legislation of the Russian Federation on pensions for state pension provision, on labor pensions;
- The processing of personal data is necessary to protect the life, health or other vital interests of the subject of personal data or the life, health or other vital interests of others and obtaining the consent of the personal data subject is impossible;
- The processing of personal data is carried out for medical and preventive purposes, with a view to establishing a medical diagnosis, the provision of medical and medico-social services, provided that the processing of personal data is carried out by a person professionally engaged in medical activities and required to maintain medical secrecy in accordance with the legislation of the Russian Federation;

- The processing of personal data is necessary to establish or implement the rights of the subject of personal data or third parties, as well as in connection with the implementation of justice;
- Processing of personal data is carried out in accordance with the legislation on compulsory types of insurance, with insurance legislation.

Processing of special categories of personal data must be immediately terminated if the reasons for their processing are eliminated, unless otherwise provided by federal law.

The processing of personal data on the criminal record can be carried out by the Operator only in cases and in the manner determined in accordance with federal laws.

## 2.6 Biometric Personal Information

Information that characterizes the physiological and biological characteristics of a person on the basis of which it is possible to establish his identity (biometric personal data) and used by the Operator to establish the identity of the subject of personal data may be processed by the Operator, only if there is consent in writing to the subject of personal data.

## 2.7 Instruction of processing personal data to another person

The operator has the right to charge the processing of personal data to another person with the consent of the personal data subject, unless otherwise provided by federal law, on the basis of a contract concluded with that person. A person carrying out the processing of personal data on behalf of the Operator shall comply with the principles and rules for the processing of personal data provided for by FL-152.

## 2.8 Cross-border transfer of personal data

The operator is obliged to make sure that the foreign state in whose territory it is intended to transfer personal data ensures adequate protection of the rights of subjects of personal data, prior to the commencement of such transfer.

Cross-border transfer of personal data on the territory of foreign states that do not provide adequate protection of the rights of subjects of personal data can be carried out in the following cases:

The consent of the personal data subject in writing to the cross-border transfer of his personal data;

The execution of a contract to which the subject of personal data is a party.

## **3. Rights of the personal data subject**

### 3.1 Consent of the subject of personal data to the processing of his personal data

The subject of personal data decides to provide his personal data and agrees to their processing freely, by his will and in his interest. Consent to the processing of personal data may be given by the subject of personal data or his representative in any form that allows to confirm the fact of its receipt, unless otherwise provided by federal law.

The obligation to provide evidence of the consent of the subject of personal data to the processing of his personal data or evidence of the grounds for processing personal data specified in FL-152 is vested in the Operator.

### 3.2 Rights of the subject of personal data

The subject of personal data has the right to receive information from the Operator concerning the processing of his personal data, if such right is not restricted in accordance with federal laws.

The subject of personal data has the right to demand from the Operator the specification of his personal data, their blocking or destruction in the event that personal data are incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, and also take measures provided by law to protect their rights.

Processing of personal data in order to promote goods, works, services on the market by making direct contacts with a potential consumer by means of communication means, as well as for the purposes of political agitation is allowed only with the prior consent of the subject of personal data. This processing of personal data is recognized to be carried out without the prior consent of the subject of personal data, unless the Operator proves that such consent was obtained.

The operator must immediately stop, upon the request of the personal data subject, the processing of his personal data in order to promote goods, works, services on the market by making direct contacts with the potential consumer by means of communication means, and also for the purposes of political agitation.

It is prohibited to make decisions based solely on the automated processing of personal data that generate legal consequences with respect to the subject of personal data or otherwise affect his rights and legitimate interests, with the exception of cases provided for by federal laws or with the consent of the personal data subject in writing.

If the subject of personal data considers that the Operator is processing his personal data in violation of the requirements of FL-152 or otherwise violates his rights and freedoms, the subject of personal data has the right to appeal against the actions or inaction of the Operator to the authorized body for the protection of the rights of subjects of personal data or in court.

The subject of personal data has the right to protect his rights and legitimate interests.

#### **4. Security of personal data**

The security of personal data processed by the Operator is ensured by the implementation of legal, organizational and technical measures necessary to ensure the requirements of federal legislation in the field of personal data protection.

- To prevent unauthorized access to personal data, the Operator uses the following organizational and technical measures:
- Appointment of officials responsible for organizing the processing and protection of personal data;
- Restriction of the composition of persons having access to personal data;
- Familiarization of subjects with the requirements of the federal legislation and regulatory documents of the Operator for the processing and protection of personal data;
- Organization of accounting, storage and circulation of information carriers;
- Differentiation of users' access to information resources and software and hardware information processing tools;
- Registration and recording of actions of personal data information systems users;
- Use of anti-virus tools;
- Application of firewall, intrusion detection, analysis of the security of information processing tools in necessary cases;

- The organization of an access regime to the territory of the Operator, security of the Operator's premises.

## **5. Final provisions**

Other rights and obligations of the Operator as a personal data operator are determined by the legislation of the Russian Federation in the field of personal data.

Officials of the Operator who are guilty of violating the rules governing the processing and protection of personal data bear responsibility stipulated by the legislation of the Russian Federation.