



Approved by: director  
Aliev Rafael Malik-Ogly

## THE PRIVACY POLICY

Zhukovsky City

July 6, 2022

This Policy applies to personal data provided by potential and current customers, purchasers and users of services of Autonomous non-profit organization of Additional Professional Education "Training Center of Professional Education" (ANO APE "TCPE") in connection with the provision of services, or in other interaction, which is accompanied by the collection, processing and storage of personal data of users.

### 1. DEFINITION OF TERMS

1.1 The following terms are used in this Privacy Policy:

1.1.1 The Site Administration <https://edu-sigma.ru> (hereinafter - the Site Administration) are authorized employees to manage the Site, acting on behalf of ANO APE "TCPO" (hereinafter - the Operator), which organizes and/or conducts processing of personal data, and also defines the purpose of processing of personal data, composition of personal data subject to processing, actions (operations) performed with personal data.

1.1.2. "Personal Data" means any information relating to a directly or indirectly identified or identifiable natural person (personal data subject) hereinafter referred to as Data.

1.1.3. "Processing of personal data" means any action (operation) or a set of actions (operations) performed with or without the use of automation means with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

1.1.4. "Confidentiality of personal data" is a mandatory requirement for the Operator or other person who obtained access to personal data to prevent its dissemination without the consent of the subject of personal data or availability of other legal grounds.

1.1.5. "User of <https://edu-sigma.ru> " (the "User") means a person who has access to the Site, via the Internet and using the Site.

1.1.6. "Cookies" is a small piece of data sent by a web-server and stored on the user's computer, which the web-client or web-browser sends to the web-server each time in an HTTP request when trying to open a page of the corresponding site.

1.1.7. "IP-address" is the unique network address of a node in a computer network built on the IP protocol.

### 2. GENERAL PROVISIONS

2.1 Use of the Site by the User implies consent to this Privacy Policy and the terms of User's personal data processing.

2.2 In case of disagreement with the terms of the Privacy Policy, the User must stop using the Site.

2.3 This Privacy Policy applies only to the Site, ANO APE "TCPO" does not control and is not responsible for the sites of third parties, to which the User can go to through the links available on the Site.

2.4 The Site Administration does not check the accuracy of personal data, provided by the User on the Site.

### **3. SUBJECT OF THE PRIVACY POLICY**

3.1 This Privacy Policy states the obligations of the Site Administration not to disclose and ensure protection of confidentiality of personal data, which the User provides at the request of the Site Administration upon registration on the Site, or upon receipt of services via the Site.

3.2 Personal data allowed for processing under this Privacy Policy are provided by the User by filling the feedback form on the Site, as well as the listener questionnaire on the learning platform and include the following information:

- 3.2.1. last name, first name, patronymic of the User;
- 3.2.2. contact phone number of the User;
- 3.2.3. e-mail address;
- 3.2.4. registration address with the postal code;
- 3.2.5. passport data: series, number, by whom and when issued;
- 3.2.6. date and place of birth;
- 3.2.7. information on place of registration, residence;
- 3.2.8. citizenship;
- 3.2.9. personal insurance policy number;
- 3.2.10. information on education, special knowledge or training;
- 3.2.11. data on vocational qualification, major;
- 3.2.12. information on educational, scientific or other professional activities of the employee;
- 3.2.13. data on professional development;
- 3.2.14. other contact information.

3.3 The Operator protects the Data, which is automatically transmitted in the process of viewing ad units and visiting pages on which the system's statistical script ("pixel") is installed:

- IP address;
- information from cookies;
- information about the browser (or other program that accesses advertising);
- access time;
- address of the page on which the ad unit is located;
- referrer (address of the previous page).

3.3.1 Disabling cookies may result in the inability to access parts of the Site, requiring authorization.

3.3.2 The Operator collects statistics about the IP-addresses of its visitors. This information is used to identify and solve technical problems, to control the legality of financial payments.

3.4 Any other personal information not stipulated above (contract history, browsers and operating systems, etc.) is subject to secure storage and non-disclosure, except as provided in paragraphs 5.2. and 5.3. of this Privacy Policy.

#### **4. PURPOSES OF COLLECTING THE USER'S PERSONAL INFORMATION**

4.1 The Site Administration may use the User's personal data for the following purposes:

4.1.1 Providing the User with access to personalized resources of the Site.

4.1.2 Establishing feedback with User, including sending notices, inquiries regarding use of the Site, provision of services, processing of inquiries and applications from the User.

4.1.3 Determination of the User's location to ensure security, prevention of fraud.

4.1.4 Confirming the authenticity and completeness of personal data, provided by the User.

4.1.5. Notifying the User of the Site.

4.1.6. Providing the User with effective customer and technical support in case of problems related to the use of the Site.

#### **5. METHODS AND TERMS OF PERSONAL INFORMATION PROCESSING**

5.1 Processing of the User's personal data is carried out without limitation of time, in any lawful way, including processing in information systems of personal data with or without the use of means of automation.

5.2 The User agrees that the Site Administration has the right to transfer personal data to third parties, in particular, postal organizations, telecommunication operators, solely for the purpose of fulfilling the terms of the User's agreement.

5.3 The User's personal data may be transferred to the authorized state bodies of the Russian Federation only on the grounds and in the procedure established by the legislation of the Russian Federation.

5.4 In case of loss or disclosure of personal data the Site Administration informs the User about the loss or disclosure of personal data.

5.5 The Site Administration takes necessary organizational and technical measures to protect the User's personal information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other unlawful actions of third parties.

5.6. The Site Administration together with the User takes all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of personal data of the User.

#### **6. RIGHTS AND OBLIGATIONS OF THE PARTIES**

##### **6.1 The User has the rights:**

6.1.1. To full information about their personal data and the processing of that data.

6.1.2 To free free access to their personal data, including the right to receive copies of any record containing personal data, except for cases provided by the legislation of the Russian Federation.

6.1.3 To request the deletion or correction of incorrect or incomplete personal data, as well as data processed in violation of the requirements defined by the labor legislation. In case of refusal to exclude or correct the employee's personal data, he or she has the right to state in writing his or her disagreement with reasoning for such disagreement.

6.1.4 To demand that the Company notifies all persons to whom incorrect or incomplete personal data were previously communicated, of all exceptions, corrections or additions made to them.

##### **6.2 The User must:**

6.1.1 Provide information about personal data necessary to use the Site.

6.1.2 Update, supplement the provided information about personal data in case of changes in this information.

### **6.3 The Site Administration has the rights:**

6.3.1 To receive from the User reliable information about the User.

6.3.2 To check the reliability of the information within the capabilities provided by the legislation of the Russian Federation.

6.3.3 To refuse to provide access to the Site to the User in case of providing false personal data.

### **6.4 The Site Administration must:**

6.4.1 Use the received information only for the purposes specified in clause 4 of this Privacy Policy.

6.4.2 Ensure that confidential information is kept confidential and is not disclosed without the User's prior written permission, as well as not to carry out sale, exchange, publication, or disclosure in any other possible ways of the User's transferred personal data of, except for clauses 5.2. and 5.3. of this Privacy Policy.

6.4.3. To take precautions to protect the confidentiality of the User's personal data in accordance with the procedure generally used for the protection of such information in the existing business.

6.4.4. To block personal data relating to the relevant User from the moment of the User's application or request, or their legal representative, or authorized body for protection of rights of subjects of personal data for the period of inspection, in case of detection of unreliable personal data or misconduct.

## **7. RESPONSIBILITY OF THE PARTIES**

7.1 The Site Administration, which has not fulfilled its obligations, must be liable for losses incurred by the User in connection with the misuse of personal data in accordance with the laws of the Russian Federation, except as provided by the clauses 5.2, 5.3. and 7.2. of this Privacy Policy.

7.2 In case of loss or disclosure of Confidential Information, the Site Administration is not responsible if such confidential information:

7.2.1. became public property before its loss or disclosure.

7.2.2. was received from a third party prior to its receipt by the Site Administration.

7.2.3. has been disclosed with the User's consent.

## **8. DISPUTE RESOLUTION**

8.1 Before going to court to resolve disputes arising out of relations between the User and the Site Administration, it is obligatory to submit a claim (written offer to voluntarily resolve a dispute).

8.2 The recipient of the claim, within 30 calendar days from the date of receipt of the claim, must notify the claimant in writing of the results of consideration of the claim.

8.3 If no agreement is reached, the dispute will be referred to a judicial body in accordance with the current legislation of the Russian Federation.

8.4 The current legislation of the Russian Federation applies to this Privacy Policy and the relations between the User and the Site Administration.

## **9. TERM OF THE POLICY**

10.1 This Policy shall be adopted for an indefinite term.

10.2 Upon adoption of a new Policy and approval by order of the Director, the previous Policy becomes null and void.

## **10.ADDITIONAL TERMS**

9.1 The Site Administration has the right to make changes to this Privacy Policy without the User's consent.

9.2 A new Privacy Policy shall take effect upon its posting on the Site, unless otherwise provided for in the new Privacy Policy.

9.3 Any suggestions or questions about this Privacy Policy should be reported with indication of the section of the site of the online store.

9.4 The current Privacy Policy can be found at: <https://edu-sigma.ru>.