

Confidentiality Policy

End User Licensed Agreement

1. General Terms and Conditions

This policy on personal data processing is drawn up in accordance with the requirements of Federal Law No.152-FZ "On Personal Data" dated 27.07.2006 (hereinafter - the Personal Data Law) and defines the procedure of personal data processing and measures on personal data security undertaken by individual entrepreneur E.O. Zhukov (hereinafter - the Operator).

1.1 The main goal and condition of the Operator's activity is to ensure respect for the rights and freedoms of individuals and citizens when processing their personal data, including the protection of the rights to privacy, personal and family secrecy.

1.2 This Operator's policy on personal data processing (hereinafter referred to as the Policy) applies to all information that the Operator may obtain about the visitors of the website <https://www.pushkarka.ru>

2. Main Definitions

2.1 Automated processing of personal data means processing of personal data with the help of computer systems.

2.2 Website means a set of graphic and informational materials, as well as computer software for ECM and databases, ensuring their availability on the Internet at network address <https://www.pushkarka.ru>

2.3 Personal data information system means a set of personal data contained in databases as well as information technologies and technical means ensuring their processing.

2.4 Anonymization of personal data means actions as a result of which it is impossible to determine without using additional information whether personal data belong to a particular User or other personal data subject.

2.5 Personal data processing means any action (operation) or 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), anonymization, blocking, deletion, destruction of personal data.

2.6 Operator means a state authority, municipal authority, legal or individual person, independently or jointly with other parties organizing and (or) carrying out processing of personal data, as well as determining the purposes of personal data processing, personal details to be processed, actions (operations) to be performed with personal data.

2.7 Personal Data mean any information relating directly or indirectly to a specific or identifiable User of the website <https://www.pushkarka.ru>

2.8 Personal data authorized for disclosure by the personal data subject mean personal data, access to which is provided by the personal data subject to an unlimited number of people by giving consent

to the personal data processing authorized for disclosure by the personal data subject in the manner prescribed by the Personal Data Law (hereinafter referred as personal data authorized for disclosure).

2.9 User means any visitor of the website <https://www.pushkarka.ru>

2.10 Provision of personal data means actions aimed at disclosure of personal data to a certain person or a certain number of people.

2.11 Disclosure of personal data means any actions aimed at disclosure of personal data to an indefinite number of people (transfer of personal data) or access to personal data by an unlimited number of people, including disclosure of personal data in mass media, distribution in information and telecommunication networks or providing access to personal data in any other way.

2.12 Cross-border transfer of personal data means transfer of personal data to the territory of a foreign state, to an authority of a foreign state, to a foreign individual or a foreign legal entity.

2.13 Destruction of personal data means any actions, as a result of which personal data are irretrievably destroyed with the impossibility of further recovery of the personal data details in the personal data information system and (or) material media of personal data are destroyed.

3. Main Rights and Obligations of the Operator

3.1 The Operator has the right to:

- receive from the personal data subject reliable information and/or documents containing personal data;
- in case the personal data subject revokes his/her consent to personal data processing, the Operator has the right to continue personal data processing without the consent of the personal data subject if there are any grounds specified in the Personal Data Law;
- independently determine the range and types of measures necessary and sufficient to ensure the fulfillment of the obligations stipulated by the Personal Data Law and regulatory legal acts adopted in accordance with it, unless otherwise provided for by the Personal Data Law or other federal laws.

3.2 The Operator is obliged to:

- provide the personal data subject, upon his/her request, with information regarding the processing of his/her personal data;
- organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;
- respond to appeals and requests of personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
- report to the authorized body for the protection of the rights of personal data subjects upon its request the necessary information within 30 days from the date of receipt of such a request;
- publish or otherwise provide unrestricted access to this Policy on personal data processing;

- take legal, organizational and technical measures to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, disclosure of personal data, as well as from other unlawful actions with regard to personal data;
- cease transfer (disclosure, provision, access) of personal data, cease the processing and destroy personal data in the manner and cases stipulated by the Personal Data Law;
- fulfill other obligations stipulated by the Personal Data Law.

4. Main 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 for cases stipulated by federal laws. The Operator shall provide information to the personal data subject in an accessible form, and it shall not contain personal data relating to other personal data subjects, unless there are legal grounds for disclosure of such personal data. The list of information and the procedure for its obtaining is established by the Personal Data Law;
- demand from the Operator to clarify their personal data, block or destroy them in case the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, as well as to take measures provided for by the law to protect their rights;
- impose the condition of prior consent for personal data processing to promote goods, works and services on the market;
- withdraw consent for the personal data processing;
- complain to the authorized body for the protection of the rights of personal data subjects or contest in a court the Operator's unlawful acts or omissions in the processing of their personal data;
- exercise other rights provided for by the legislation of the Russian Federation.

4.2 Personal data subjects are obliged to:

- provide the Operator with accurate data about themselves;
- notify the Operator about modification (update, change) of their personal data.

4.3 People, who have passed to the Operator false information about themselves, or information about another personal data subject without the consent of the latter, shall be liable in accordance with the legislation of the Russian Federation.

5. The Operator Has the Right to Process the Following Personal Data of the User:

5.1 Surname, first name, patronymic.

5.2 Telephone number.

5.3 The website also collects and processes anonymized guest data (including cookies) using internet services (Yandex, Metrika, LiveTex, TravelLine).

5.4 The above data are collectively referred to as Personal Data in the text of the Policy.

5.5 The Operator does not process special categories of personal data concerning race, nationality, political opinions, religious or philosophical beliefs and private life.

5.6 The processing of personal data authorized for disclosure from a list of special categories of personal data specified in Article 10, paragraph 1 of the Personal Data Law is allowed if the prohibitions and conditions provided for in Article 10.1 of the Personal Data Law are observed.

5.7 The User's consent to the processing of personal data authorized for disclosure is executed separately from other consents to the processing of his/her personal data. In this case, the conditions stipulated, in particular, by Article 10.1 of the Personal Data Law shall be complied with. The requirements for the content of such consent are established by the authorized body for the protection of the rights of personal data subjects.

5.7.1 The User shall directly provide the Operator with the consent to the processing of the personal data authorized for disclosure.

5.7.2 The Operator is obliged to publish information about the conditions of processing, prohibitions and conditions for processing by an unlimited number of people of personal data authorized for disclosure no later than three working days after receiving the said consent of the User.

5.7.3 The transfer (disclosure, provision, access) of personal data authorized by the personal data subject for disclosure shall be terminated at any time at the personal data subject's request. This request shall include the surname, first name, patronymic (if any), contact information (telephone number, e-mail address or postal address) of the personal data subject, as well as a list of personal data whose processing is subject to termination. The personal data specified in this request may be processed only by the Operator to whom it is sent.

5.7.4 The consent to the personal data processing authorized for disclosure becomes null and void upon receipt of the request specified in clause 5.7.3 of this Policy on Personal Data Processing by the Operator.

6. Principles of Personal Data Processing

6.1 The personal data processing is carried out on a lawful and fair basis.

6.2 The personal data processing is confined to the achievement of specific, predetermined and legitimate purposes. The personal data processing is not allowed if it is incompatible with the purposes of personal data collection.

6.3 It is not permitted to merge databases containing personal data processed for incompatible purposes.

6.4 Only those personal data shall be processed that meet the purposes for which they are intended to.

6.5 The content and the scope of processed personal data shall correspond to the stated purposes of processing. Redundancy of processed personal data in relation to the stated purposes of their processing is not allowed.

6.6 The accuracy of personal data, their sufficiency and, where necessary, relevance to the purposes of personal data processing shall be ensured during the processing of personal data. The Operator shall take the necessary measures and/or ensure that they are taken to delete or clarify incomplete or inaccurate data.

6.7 Personal data shall be stored in a form that allows identification of the personal data subject for no longer than required by the purposes of personal data processing, unless the period of personal data storage is established by the federal law, a contract to which the personal data subject is a party, a beneficiary or a guarantor. The processed personal data shall be destroyed or anonymized when the purposes of processing have been achieved or when it is no longer necessary to achieve these purposes, unless otherwise provided for by the federal law.

7. Purposes of Personal Data Processing

7.1 Purposes of the User's personal data processing are as follows:

- to inform the User by sending e-mails;
- to conclude, execute and terminate civil law contracts;
- to provide the User with access to services, information and/or materials available on the website <https://www.pushkarka.ru>

7.2 The Operator is also entitled to send notifications to the User about new products and services, special offers and various events. The User can always refuse to receive information messages by sending a notification to the Operator's e-mail address booking@pushkarka.ru with the note "Refusal to receive any messages about new products and services and special offers".

7.3 The User's anonymized data collected through Internet statistics services are used to collect information about the User's activities on the website, to improve the quality of the website and its content.

8. Legal Basis for Personal Data Processing

8.1 The legal grounds for personal data processing by the Operator are as follows:

- statutory (founding) documents of the Operator;
- federal laws, other regulatory legal acts in the field of personal data protection;
- Users' consent to the processing of their personal data, to the processing of personal data authorized for disclosure.

8.2 The Operator shall process the User's personal data only if the User fills them in and/or sends them himself/herself via special forms located on the website <https://www.pushkarka.ru> or sent to the Operator via e-mail. By filling in the relevant forms and/or sending his/her personal data to the Operator, the User expresses his/her consent to this Policy.

8.3 The Operator shall process anonymized data about the User if this is allowed in the User's browser settings.

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

9. Terms and Conditions of Personal Data Processing

9.1 Personal data processing is carried out with the consent of the personal data subject regarding the processing of his/her personal data.

9.2 Personal data processing is necessary to achieve the purposes provided for by the international treaty of the Russian Federation or law, to fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation.

9.3 The personal data processing is necessary for the execution of a contract to which the personal data subject is a party or a beneficiary or a guarantor, as well as for the conclusion of a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or a guarantor.

9.4 The personal data processing is necessary for the exercise of the rights and legitimate interests of the operator or third parties or for the achievement of socially important purposes, provided that the rights and freedoms of the personal data subject are not violated.

9.5 Processing of personal data is carried out where access to which is granted to an unlimited number of people by the personal data subject or at his/her request (hereinafter referred to as publicly available personal data).

10. Procedure for Collection, Storage, Transfer and Other Types of Personal Data Processing

The security of personal data processed by the Operator is ensured by implementing legal, organizational and technical measures necessary for full compliance with the requirements of the applicable legislation in the field of personal data protection.

10.1 The Operator shall ensure the safety of personal data and take all possible measures to exclude access to personal data by unauthorized people.

10.2 The User's personal data shall never, under no circumstances, be transferred to third parties, except in cases related to the execution of the applicable law or if the personal data subject has given his/her consent to the Operator to transfer the data to a third party for the fulfillment of obligations under a civil law contract.

10.3 If any inaccuracies in personal data are detected, the User may update them independently by sending a notice to the Operator's e-mail address booking@pushkarka.ru with a note "Personal Data Update".

10.4 The term of personal data processing depends on the achievement of the purposes for which the personal data are collected, unless another term is stipulated by the contract or the applicable law.

The User may withdraw their consent to the personal data processing at any time by sending a notice to the Operator's e-mail address booking@pushkarka.ru with a note "Withdrawal of consent to personal data processing".

10.5 Any information that is collected by third-party services, including payment systems, means of communication and other service providers, is stored and processed by the specified parties (Operators) in accordance with their User Agreement and Confidentiality Policy. The personal data subject and/or User is obliged to familiarize himself/herself with the said 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 personal data subject on transfer (except for granting access), as well as on processing or conditions of processing (except for obtaining access) of personal data authorized for disclosure shall not apply in cases of personal data processing in the state, social and other public interests defined by the legislation of the Russian Federation.

10.7 The Operator shall ensure confidentiality of personal data during their processing.

10.8 The Operator shall store personal data for the identification of the personal data subject for no longer than required for the purposes of personal data processing, unless the period of personal data storage is established by the federal law, a contract to which the personal data subject is a party, a beneficiary or a guarantor.

10.9 The termination of personal data processing may be subject to the achievement of the purposes of personal data processing, expiry of the personal data subject's consent or withdrawal of consent by the personal data subject, as well as detection of unlawful processing of personal data.

11. List of Activities Performed by the Operator with the Received Personal Data

11.1 The Operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (disclosure, provision, access), anonymizes, blocks, deletes and destroys personal data.

11.2 The Operator shall carry out automated processing of personal data with receiving and/or transmitting the received information via information and telecommunication networks or without it.

12. Cross-border Transfer of Personal Data

12.1 Before commencing a cross-border transfer of personal data, the Operator is obliged to ensure that the foreign state, to the territory of which the transfer of personal data is to be carried out, provides reliable protection of the rights of personal data subjects.

12.2 Cross-border transfer of personal data to the territories of foreign states that do not meet the above requirements may be carried out only if the personal data subject has given his/her written consent to the cross-border transfer of the personal data and/or if the contract is executed to which the personal data subject is a party.

13. Confidentiality of Personal Data

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

14. Final Provisions

14.1 The User may obtain any clarifications regarding the processing of his/her personal data by contacting the Operator via e-mail at booking@pushkarka.ru

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

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

Personal Information

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The said Agreement has been legally signed by Chief Accountant Elena Evgenievna Runova, acting on the basis of Power of Attorney No. 33 AA 2067921 of 18.09.20