

## **POLICY FOR PROTECTION AND PROCESSING OF PERSONAL DATA OF USERS**

This Policy for the Protection and Processing of Personal Data of Users (hereinafter referred to as the Policy) defines the general principles and procedures for the processing of the Personal Data of the users of the web-site <https://plario.net> (hereinafter referred to as the Site) and measures to ensure their protection and security provided by Enbisy OOO, TIN 7017138970 (hereinafter referred to as the "Operator"), complies with the requirements of the Federal Law No. 152-FZ "On Personal Data", the General Data Protection Regulation (GDPR), (Decree (EU) 2016/679 ), which are binding legislative acts in the Russian Federation and the European Union, respectively.

### **1. Terms and definitions**

For the purposes of this Policy, the terms, definitions and derivatives of them specified in this paragraph should be interpreted in the meaning in which they are defined:

**Personal data** - any information relating to a directly or indirectly identified or identifiable natural person (subject of personal data / User).

**User** - a person who has access to the Site via the Internet.

**Provision of personal data** - actions aimed at disclosing Personal data to a certain person or a certain group of people.

**Processing of personal data** - any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

**Blocking of personal data** is a temporary suspension of the processing of personal data (unless the processing is necessary to clarify personal data).

**Distribution of personal data** - actions aimed at disclosing personal data to an indefinite group of people (transfer of personal data) or familiarizing with personal data of an unlimited number of people, including the disclosure of personal data in the media, placement in information and telecommunication networks or providing access to personal data in any other way.

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

**Destruction of personal data** – actions making it impossible to restore the content of personal data in the information system of personal data and (or) leading to destruction of material carriers of personal data.

### **2. General provisions**

2.1. This Personal Data Processing Policy has been developed in accordance with the provisions of Federal Law No. 152-FZ "On Personal Data", the General Data Protection Regulation (GDPR), (Regulation (EU) 2016/679), and other legislative and regulatory legal acts, which are binding in the Russian Federation and the European Union, respectively.

2.2. This Policy is valid until the publication of a new version on the Operator's Website.

2.3. Actions to ensure the security of the Personal Data are an integral part of the Operator's activities.

2.4. The operator must observe the following principles:

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2.4.1. The collection of Personal Data is carried out only for specific, clear and legitimate purposes and does not provide for further processing of data incompatible with these purposes. The Operator processes Personal Data for the purposes specified in clause 4.2. of this Policy.

2.4.2. The processing of Personal Data is carried out in a lawful, fair and open manner;

2.4.3. The collection of Personal Data is limited only to the information necessary for the purposes for which the data is collected;

2.4.4. Personal data is accurate and, if necessary, deleted or corrected without delay (accuracy);

2.4.5. Personal data is stored in a form that allows the User to be identified for the time necessary for the purposes for which this data was collected (restriction of storage);

2.4.6. The processing of Personal Data is carried out in a manner that ensures the appropriate security of Personal Data, including protection against unauthorized or illegal Processing, as well as against accidental loss, damage or destruction, using appropriate technical and organizational actions;

2.4.7. The User has the right to access their Personal Data, to change or delete it, to restrict the Processing, to object to it, as well as the right to data portability.

### **3. Terms of Personal Data Processing**

3.1. The processing of Personal Data by the Operator is allowed in the following cases:

3.1.1. If the User consents to the processing of his Personal Data. Consent is given by the User ticking the appropriate box.

3.1.2. When transferring the Personal data of the subject of personal data by the User through the Site, the User guarantees that he has previously received from the subject of personal data consent to the transfer of Personal data to the Operator.

3.2. Personal data is subject to publication or mandatory disclosure in accordance with the legislation of the Russian Federation or the European Union, respectively.

3.3. The Operator does not disclose to third parties and does not distribute Personal Data without the consent of the User, unless otherwise provided by the legislation of the Russian Federation or the European Union, respectively.

3.4. The Operator does not process Personal Data relating to special categories and relating to race and nationality, political views, religious or philosophical beliefs, health status, intimate life of the subject of personal data, membership of the subject of personal data in public associations, except as expressly provided by law Russian Federation or the European Union, respectively.

3.5. The Operator does not carry out cross-border transfer of Users' Personal Data.

3.6. By providing the User with the opportunity to use the Site, the Operator, acting reasonably and in good faith, considers that the User has all the necessary rights to allow him to register on the Site and use it.

3.7. The Operator does not verify the accuracy of the collected information about Users, except when such verification is necessary in order to comply with the provisions of the legislation of the Russian Federation or the European Union, respectively, and / or obligations to the User.

### **4. Collection and Processing of Personal Data**

4.1. The Operator collects and stores only those Personal Data that are necessary to fulfill contractual obligations to the User, send a demo version of the software, provide access to the demo version of the

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software, send newsletters, help in testing the software through the Site. At the same time, the collection of Personal Data can be carried out both through the Site and at the location of the Operator.

4.2. The Operator processes Personal Data for the following purposes:

4.2.1. Carrying out activities stipulated by the Bylaws of the Operator, the legislation of the Russian Federation or the European Union, and the Policy for the protection and processing of personal data of users, respectively.

4.2.2. Fulfillment of the obligations of the Operator for the distribution of information and advertising materials to the User.

4.2.3. For consultations of the User, communications with the User if necessary, including for sending notifications, information and requests related to the fulfillment of contractual obligations to the User, as well as processing applications, requests and applications of the User.

4.2.4. To contact the User in case of sending a demo version of the software, providing access to the demo version of the software.

4.2.5. To contact the User in case of need to provide assistance in software testing.

4.2.6. To improve the quality of software developed by the Operator.

4.2.7. To improve the quality of technical support services provided by the Operator.

4.2.8. To promote the Operator's software on the market by making direct contacts with the User.

4.2.9. To conduct statistical, marketing and other research based on depersonalized Personal Data.

4.3. In addition to the purposes specified in paragraph 4.2 of the Policy, the purposes of Personal Data Processing are to achieve the purposes provided for by the legislation of the Russian Federation or the European Union, respectively.

4.4. For the purposes specified in paragraphs 4.2.1–4.2.9 of the Policy, the Operator processes the following Personal Data:

4.4.1. Personal data entered by the User in the form of a request:

- name;
- surname;
- organization (educational institution);
- subdivision (department);
- position;
- e-mail (e-mail address);
- phone number.

4.4.2. Data additionally provided by the User at the request of the Operator, sent to the User in the event of a corresponding need, for example, for the purpose of suppressing violations of the rights and legitimate interests of third parties. The Operator has the right, in particular, to request from the User a copy of an identity document or another document containing the name, surname, photograph of the User, as well as other additional information that, at the discretion of the Operator, will be necessary and sufficient for the Policy for the protection and processing of personal data of users of identification of

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such a User and will allow to exclude abuses and violations of the rights of third parties, and the User, at his own discretion, voluntarily provides this information and copies of documents.

4.5. For the purposes specified in paragraphs 4.2.1–4.2.9 of the Policy, the Operator processes the following data:

4.5.1. Standard technical and other data automatically received by the Operator when the User accesses the Site and the User's subsequent actions on the Site (location at a certain point in time, IP address, operating system type of the User's device, sections of the Site visited by the User).

4.6. Processing of special categories of Personal data relating to race, nationality, political views, religious or philosophical beliefs, intimate life is not carried out by the Operator.

4.7. With regard to Personal data and other data of the User, their confidentiality is maintained, except when the specified data is public.

4.8. The Operator has the right to keep an archival copy of Personal Data and other data until the goals of Personal Data Processing are achieved.

4.9. The Operator has the right to transfer Personal data and other data of the User without the consent of the User to the following persons:

4.9.1. To state bodies, including bodies of inquiry and investigation, and local governments at their reasoned request.

4.9.2. Partners of the Operator in order to fulfill contractual obligations to the User.

4.9.3. In other cases expressly provided for by the current legislation of the Russian Federation or the European Union, respectively.

4.10. The Operator has the right to transfer Personal data and other data of the User to third parties not specified in clause 4.9 of this Policy in the following cases:

4.10.1. The user has expressed his consent to such actions.

4.10.2. The transfer is necessary as part of the User's use of the Site.

4.10.3. The transfer takes place as part of the reorganization of the Operator, while all obligations to comply with the terms of this Policy are transferred to the reorganized legal entity.

4.11. The Operator carries out automated and non-automated processing of Personal data and other data.

4.12. The Operator discloses the User's personal data to its employees and employees of companies belonging to the Enbisys Group of Companies, which includes, in addition to Enbisys LLC:

Enbisys EdTech LLC,

ANO DPO Digital University Enbisys (Enterprise Business Systems).

## **5. Actions to ensure security and protection of Personal Data**

5.1. The Operator takes the necessary legal, organizational and technical actions to ensure the security of Personal Data to protect it from unauthorized access, destruction, modification, blocking access and other unauthorized actions. Security measures are constantly being improved as new technologies develop.

5.2. Access to information systems containing Personal Data is provided by a password system. Passwords are set by authorized employees of the Operator and individually communicated to the Operator's employees who have access to Personal Data.

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5.3. The operator applies security measures (anti-virus tools, means of protection against unauthorized access).

5.4. The operator ensures the physical security of the premises and processing facilities, access control, security of the premises.

5.5. Upon receipt by the Operator of Personal Data of a request containing the withdrawal of the User's consent to the processing of Personal Data, the Operator is obliged to delete Personal Data from the Site. The User's personal data is deleted from the Site when the Operator deletes the information posted by the User. After deleting the User's Personal Data from the Site, the Operator stores them on its electronic media for the period established by the legislation of the Russian Federation or the European Union, respectively.

## **6. Change of Personal Data**

6.1. The User can at any time change (update, supplement) Personal Data by sending a corresponding request to the Operator in the manner provided for in paragraph 9.4. of the Policy, provided that such changes and corrections contain up-to-date and reliable information.

## **7. Privacy of personal data**

7.1. The Operator ensures the confidentiality of the Personal Data processed by him in the manner prescribed by the legislation of the Russian Federation or the European Union, respectively.

7.2. Confidentiality is not required for:

7.2.1. Personal data after depersonalization.

7.2.2. Personal data, access of an unlimited number of persons to which is provided by the User or at his request.

7.2.3. Personal data subject to publication or mandatory disclosure in accordance with the legislation of the Russian Federation or the European Union, respectively.

7.3. It is not a violation of the confidentiality of Personal Data that the Operator provides information to third parties acting on the basis of agreements with the Operator to fulfill obligations to the User.

## **8. Consent of the User to the Processing of Personal Data**

8.1 The User decides to provide his Personal Data to the Operator and agrees to their Processing freely, by his own will and in his own interest. The User expresses his consent to the processing of personal data by ticking a special box on our Site, thereby the User, as the subject of personal data, gives voluntary and specific consent to the Operator for the processing of his personal data, the list of which is specified in paragraph 4.4 of the Policy, including the collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), subject to the current legislation of the Russian Federation, depersonalization, blocking, deletion, destruction of personal data with and without the use of means automation in accordance with the goals specified in paragraph 4.2 of the Policy.

8.2 The consent provided by the User in accordance with this Policy to the processing of your personal data is valid until the said consent is withdrawn in accordance with Section 9 of the Policy, unless otherwise provided by the current legislation of the Russian Federation.

8.3. The consent given by the User in accordance with this Policy to the processing of your personal data may be revoked by the User at any time. In this case, the Operator is obliged to stop processing your personal data or ensure the termination of such processing (if the processing of personal data is carried

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out by another person acting on behalf of the Operator) and, if the storage of personal data is no longer required for the purposes of processing personal data, destroy personal data or ensure their destruction (if the processing of personal data is carried out by another person acting on behalf of the Operator) within the period established by the legislation of the Russian Federation.

You can send the User a withdrawal of the previously provided consent to the processing of your personal data in one of the following ways:

By sending a relevant application by mail to the address: 8/8 Akademicheskoy avenue, office 612, Tomsk, Russian Federation, 634055;

- By sending a relevant application in the form of an electronic document signed with an electronic signature in accordance with the legislation of the Russian Federation to the email address [info@plario.ru](mailto:info@plario.ru);
- By sending a relevant application through the contact form on the website: <https://plario.net>.

8.4. The personal data of persons who have entered into contractual obligations with the Operator, contained in the unified state registers of legal entities and individual entrepreneurs, are open and publicly available, with the exception of information about the number, date of issue and the authority that issued the identity document of an individual. The protection of their confidentiality and the consent of Users for processing is not required.

8.5. In the event of requests from organizations that do not have the appropriate authority, the Operator is obliged to obtain the User's prior consent to provide his Personal Data and warn the persons receiving Personal Data that this data can be used only for the purposes for which they are reported, and also require these persons to confirm that this rule will (was) observed.

## 9. User rights

9.1. The user has the following right:

9.1.1. receive information about their Personal Data and the Processing of this data by sending a corresponding request to the Operator in writing;

9.1.2. receive copies of any record that contains the User's Personal Data, except in cases where this is contrary to the legislation of the Russian Federation or the European Union, respectively;

9.1.3. demand the exclusion and / or correction of their Personal Data, data that was processed in violation of the requirements defined by the legislation of the Russian Federation or the European Union, respectively. The Operator also has the right to express its disagreement in writing with justification if the representative of the Operator working with Personal Data refuses to exclude or change such data;

9.1.4. demand the destruction of Personal Data in case of their illegal receipt or use for purposes not previously declared when they were provided by the User, by sending a corresponding request to the Operator in writing; User personal data protection and processing policy

9.1.5. require the Operator to clarify his Personal Data, block it or destroy it if the Personal Data is incomplete, outdated, inaccurate, by sending a corresponding request to the Operator in writing;

9.1.6. take legal measures to protect their rights;

9.1.7. withdraw your consent to the Processing of Personal Data by sending a corresponding request to the Operator in writing.

9.2. If the User believes that the Operator is processing his Personal Data in violation of the requirements of the legislation of the Russian Federation or the European Union, respectively, or otherwise violates his

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rights and freedoms, the User has the right to appeal the actions or inaction of the Operator to the authorized body for the protection of the rights of Personal Data Subjects or to judicial order.

9.3. The user has the right to protect his rights and legitimate interests, including damages and (or) compensation for moral damage in court.

9.4. In order to exercise their rights, the User has the right to contact the Operator by sending an appropriate request in one of the following ways:

- By sending the relevant application by mail to the address: 8/8 Akademicheskoy avenue, office 612, Tomsk, Russian Federation, 34055;
- By sending a relevant application in the form of an electronic document signed with an electronic signature in accordance with the legislation of the Russian Federation to the email address [info@plario.ru](mailto:info@plario.ru);
- By sending a relevant application through the contact form on the website: <https://plario.net>.

### **10. Personal data of third parties used by the User**

10.1. Using the Site, the User has the right to enter the data of third parties in order to receive newsletters.

10.2. The User undertakes to obtain the prior consent of the Personal Data Subject for their use through the Site. The user is solely responsible for the lack of such consent.

10.3. The Operator undertakes to take the necessary measures to ensure the safety of the Personal Data of third parties entered by the User.

### **11. Miscellaneous**

11.1. All possible disputes are subject to resolution in accordance with the legislation of the Russian Federation at the location of the Operator. Before going to court, the User must comply with the mandatory pre-trial procedure and send the Policy for the protection and processing of personal data of users to the Operator with a corresponding claim in writing. The term for responding to a claim is 30 (thirty) business days.

11.2. Persons guilty of violating the rules governing the receipt, processing and protection of personal data bear disciplinary, administrative, civil or criminal liability in accordance with the legislation of the Russian Federation or the European Union, respectively.

11.3. If, for one reason or another, one or more provisions of the Policy are declared invalid or unenforceable, this does not affect the validity or applicability of the remaining provisions of the Policy.

11.4. The Operator has the right at any time to change this Policy (in whole or in part) unilaterally without prior agreement with the User by posting an updated version on the Site. All changes come into force from the moment the new edition of the Policy is posted on the Website.

11.5. The User undertakes to independently monitor changes to the Policy by reviewing the current version.

11.6 With regard to data processing processes carried out on the basis of the User's consent, the Operator does not have the right to change the scope of such processing of Personal Data, unless the User provides additional consent to change the scope of information processing.

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12. Contact information of the Operator

ENBISYS LLC

8/8 Akademichesky avenue, office 612, Tomsk, Russian Federation, 634055

Tel: +7 3822 990049

E-mail: [info@plario.ru](mailto:info@plario.ru);