

LLC "CTT" ETALON " PRIVACY POLICY
on the processing of personal data of participants in incentive actions /
championships of LLC "CTT" Etalon "- www.everlegends.com and in
the Everlegends mobile app on the App Store and Google Play.

1. General terms and provisions

1.1. This Policy is an addition to the Policy on personal data of LLC "CTT" Etalon " located at the following website address www.everlegends.com "Privacy Policy" and in the mobile application "Everlegends" available in the App Store and Google Play ("**Policy of LLC "CTT" Etalon "**").

The terms of this Policy are aimed at specifying the provisions of the general Policy of **LLC "CTT "Etalon" in** order to comply with the provisions and norms of the legislation of the Russian Federation. Together, they constitute a single **Personal Data Policy ("Policy")** .

The personal data policy is the official Policy of Everlegends (Everlegends.com) as a member of **LLC "CTT "Etalon"**

1.2. The Policy defines the general principles and procedure for the processing of personal data of consumers of goods and services of **LLC "CTT "Etalon"** and of participants in Everlegends incentive promotions, as well as measures to ensure their security on the part of **LLC "CTT "Etalon"** (hereinafter **referred to as the "Operator"**).

The purpose of this Policy is to ensure the protection of the rights and freedoms of a person and citizen when processing his / her personal data, including the protection of the rights to privacy, personal and family secrets, clear and strict observance of the requirements of Russian legislation in the field of personal data.

1.3. The policy regarding the processing of personal data has been developed in accordance with the provisions of the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data", other legislative and regulatory legal acts of the Russian Federation that determine the procedure for working with personal data and requirements for ensuring their security.

1.4. This Policy uses the terms provided by the current legislation, as well as the following definitions:

Everlegends' products / services - products, production and / or sale of which is carried out by **LLC "CTT" Etalon "**;

Everlegends incentive promotions, championships / promotions - events for consumers aimed at stimulating the sale of goods and services of **LLC "CTT" Etalon"**, the organization and conduct of which is carried out by **LLC "CTT" Etalon "** or other persons on its behalf;

data centre - a specialized organization that provides services for the placement of server and network equipment, leasing servers (including virtual ones), as well as connecting to the Internet;

information system of personal data - a set of personal data contained in databases, as well as information technologies and technical means ensuring its processing;

processing of personal data - 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, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;

operator - a legal or natural person, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as determining the

purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data. The operator is **LLC "CTT" Etalon "**;

CRM system operator - an entity that processes personal data on behalf of the operator, in particular, Regional Network Information Centre JSC, which operates the CRM system, including processing personal data for the purposes indicated below; the server part of the CRM system is located in a data centre owned by Regional Network Information Centre JSC;

personal data - any information relating directly or indirectly to a specific or identifiable individual (subject of personal data);

participant of promotions - a subject of personal data participating in Everlegends incentive promotions / championships ("**promotions / championships** ") conducted by the Operator or in the interests of the Operator, whose data is stored and processed in the CRM system;

CRM-system - a set of software tools based on DirectCRM software, intended for the placement and processing of the Operator's data on the basis of an agreement with the operator of the CRM-system;

Operator's Internet sites and mobile applications - Internet sites, pages and mobile applications owned by the Operator and / or administered by the Operator or other persons on behalf of and for the Operator.

1.5. The Policy applies to all personal data of Personal Data Subjects provided for in this Policy (in accordance with the definition below) processed by the Operator using automation tools and without using such means, as well as personal data, the processing of which the Operator entrusts to another entity, including the CRM systems operator.

1.6. The Operator draws up this Policy as an official Policy of **LLC "CTT "Etalon"** and publishes the Policy on its official websites and websites of the respective brands by posting the Policy or linking to it, and also provides unlimited access to it to any person having personally contacted the Operator. **The subject of personal data, when providing his / her data, agrees with the Policy in accordance with clause 7.3.**

* RU-CENTER (Regional Network Information Centre JSC) is one of the largest domain name registrars and hosting providers in Russia. The company is the flagship of the RU-CENTER Group, which in turn is part of the RBC holding. OKPO (National Classifier of Enterprises and Organizations): 96482133. OKATO (Russian National Administrative-Division Classification Code): 45283573000. OKVED (Russian National Classifier of Types of Economic Activity): 63.11.1. OGRN (Primary State Registration Number): 1067746823099. VO: 20100. Registered in the Unified State Register of Legal Entities by the Interdistrict Inspectorate No. 46 in Moscow. Record number: 1067746823099 dated July 17, 2006 the legal address of JSC "RNIC", Moscow, street Horoshevskaya 3rd, HOUSE 2, BUILDING 1, FLOOR 4 PREMISE. I SUITE. 40.

Operator's status and categories of subjects whose personal data is processed by the Operator

1.7. The operator is the operator of the personal data of the following subjects (hereinafter - "**Subjects of personal data** "):

- A) participants of promotional campaigns / championships held by the Operator or in the interests of the Operator for the purpose of promoting the goods and / or services of "Everlegends", whose data is stored and processed in the CRM system;
- B) visitors to the Operator's Internet sites and mobile application who provide the Operator with their personal data for the purpose of obtaining information on the sites, participating in the Operator's promotions / championships and performing other activities on the Internet sites.
- C) consumers contacting the Operator's email address info@everlegends.com , as well as leaving messages using the Operator's contact forms or using other means ** .

**** processing of consumer data specified in clause "C" above is carried out in accordance with the special section 11 below.**

2.2. The processing of personal data of the above Personal Data Subjects is performed by a third party on behalf of the Operator, in particular, the Regional Network Information Centre JSC.

2.3. The list of personal data processed by the Operator includes: full name (surname, first name, patronymic), date of birth, gender, phone number, email address, registration address, taxpayer's personal identification number (TIN). Depending on the type of promotion / championship in which the Personal Data Subject participates, the list of requested data may change. The list is always accurately and completely provided in the form that the Subject fills out when providing personal data.

2.4. When processing personal data, the Operator also has the right to receive data about the Subjects of personal data from open sources (for example, data published on the Internet in social networks). The personal data subject understands and agrees that the Operator has the right to receive and process such published data.

3. Principles of processing personal data

The processing of personal data by the Operator and on his behalf is carried out in accordance with the following principles:

3.1. Legality and fair basis for the processing of personal data. The operator takes all necessary measures to comply with the requirements of the law, does not process personal data in cases where this is not allowed by the laws of the Russian Federation, does not use personal data to the detriment of the subjects.

3.2. Restricting the processing of personal data to achieve specific, predetermined and legitimate goals. **The purpose of the processing of personal data by the Operator is to attract subjects to participate in promotions, championships and marketing research conducted by the Operator or in the interests of the Operator, to inform about the Operator's products and promotions, championships held by it, to organize the delivery of prizes / rewards (if they win), to publish lists winners of promotions and persons who have won prizes, conducting market research and analytics by the Operator in relation to the data received .**

Depending on the type of promotion, the championship in which the Personal Data Subject participates, the list of requested data may change, as well as the procedure for using personal data. The personal data is used in the manner prescribed by law.

3.3. Processing is carried out only of that personal data which meets the previously announced purposes of its processing. Compliance of the content and volume of processed personal data with the stated processing purposes. The operator declares that it does not collect or process personal data that is not required to achieve the goals specified in clause 3.2 of this Policy, does not use personal data of subjects for any purposes other than those specified above.

3.4. Ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of processing personal data. The Operator takes all reasonable measures to maintain the relevance of the processed personal data, including, but not limited to, the exercise of the right of each subject to receive their personal data for review and require the Operator to clarify, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the processing purposes stated above.

3.5. Storing personal data in a form that allows you to determine the Subject of personal data for no longer than is required by the purpose of processing personal data, unless the storage period for personal data is established by federal law, an agreement to which the subject of personal data is a party or beneficiary.

3.6. Destruction or depersonalization of personal data upon achievement of the stated purposes of their processing or in case of loss of the need to achieve these goals, if the Operator cannot eliminate the violations of the procedure for processing personal data established by law, revoke consent to the processing of personal data by the subject, unless otherwise provided by federal laws or agreements with subjects.

4. Personal data processing conditions

4.1. The processing of personal data provided for by the Operator is allowed in the following cases:

4.1.1. With the consent of the subject of personal data to the processing of his / her personal data.

4.1.2. To carry out and fulfil the functions, powers and duties imposed on the Operator by the legislation of the Russian Federation.

4.1.3. For the performance of a contract, to which the subject of personal data is a party or beneficiary. Such agreements are, for example, public offers (including oral offers) accepted by the participants of the incentives / championships.

4.1.4. The processing of personal data is carried out for statistical or other research purposes, subject to the mandatory depersonalization of personal data.

4.1.5. Access of an unlimited number of persons to personal data is provided by the subject of personal data or at his request.

4.1.6. Personal data is subject to publication or mandatory disclosure in accordance with federal laws.

4.2. The operator does not disclose to third parties and does not distribute personal data without the consent of the subject of personal data, unless otherwise provided by federal laws. However, downloading the "Everlegends" application from the App Store or Google Play means the Subject's consent to the processing of personal data, as well as a certain availability to third parties of the Subject's personal data voluntarily and deliberately transferred to the Operator.

4.3. The operator does not process personal data belonging to special categories and relating to race and nationality, political views, religious or philosophical beliefs, health status, if the conditions provided for by the current legislation are not met.

5. Personal data processing methods

5.1. The operator processes personal data using automation tools, as well as without using such tools.

5.2. This Policy also applies to the processing of personal data without using automation tools, if such processing corresponds to the nature of the actions (operations) performed with personal data using automation tools, that is, it allows to search for personal data recorded on a certain hard drive in accordance with the specified algorithm carrier, and contained in the records or other systematized collections of personal data, and (or) access to such personal data;

5.3. This Policy provides for the processing of personal data by any means provided by law, including by collecting, recording, systematizing, accumulating, storing, clarifying (updating, changing), extracting, using, transferring (distributing, providing, accessing), depersonalizing, blocking, deleting, destructing of personal data.

5.4. In accordance with this Policy, the Operator can process personal data in the above ways independently, as well as with the involvement of third parties, in particular, the operator of the CRM system, which processes the personal data of the above subjects on behalf of the Operator, other companies of the LLC "CTT" Etalon" group and other third parties who are involved by the Operator

and carry out processing to fulfil the purposes specified in this Policy.

5.5. This Policy does not provide for the possibility of cross-border transfer of personal data (transfer of personal data to the territory of a foreign state) to third parties to fulfil the purposes specified in this Policy, including in cases where data centres are located on the territory of a foreign state.

5.6. In accordance with the requirements of the current legislation, when collecting personal data, the operator records, systematizes, accumulates, stores, clarifies (updates, changes), extracts personal data of citizens of the Russian Federation, as well as citizens of other states acting in accordance with the procedure provided for in the User Agreement, who downloaded Everlegends application from the App Store or Google Play using databases located on the territory of the Russian Federation.

6. Confidentiality of personal data

6.1. The operator ensures the confidentiality of the personal data processed by him in the manner prescribed by federal laws, taking into account the User Agreement and these provisions.

6.2. In the case of entrusting the processing of personal data to another person, the volume of personal data transferred to another person for processing and the number of processing methods used by this person should be the minimum necessary to fulfil his obligations to the Operator. With regard to the processing of personal data by a third party, the obligation of such a person to maintain the confidentiality of personal data and ensure the security of personal data during their processing should be established, and the requirements for the protection of the processed personal data should be indicated.

6.3. The operator has the right to place its personal data information systems on the hosting or in the data centre of other persons. If the agreement with the operator of the information system providing hosting services and / or the data centre does not allow the personnel of the operator of the information system (data centre) to access the information system of personal data, this placement is not considered as an order to the operator of the information system (data centre) processing personal data and does not require the consent of the subjects of personal data.

6.4. In the event that the Operator entrusts the processing of personal data to another person, the Operator bears responsibility to the subject of personal data for the actions of this person. The person / entity who processes personal data on behalf of the Operator is responsible to the Operator and to the Subjects of personal data.

7. Consent of the subject of personal data to the processing of his / her personal data

The subject of personal data decides to provide his / her personal data to the Operator and agrees to their processing freely, of his own free will and in his / her interest. Consent to the processing of personal data is specific, informed and conscious and can be provided by the subject in any form that allows confirming the fact of its receipt, unless otherwise provided by federal laws. In particular, consent is deemed to have been granted if the Personal Data Subject downloads the Everlegends application from the App Store or Google Play and / or ticks the checkbox in the registration form on the Internet and or / in the Mobile Application to confirm that he / she agrees with this Policy.

7.1. In case of obtaining consent to the processing of personal data from a representative of a minor Subject of personal data, the powers of such representative to give consent on behalf of the subject of personal data can be verified by the Operator.

7.2. Subjects of personal data give their consent to the processing of their personal data by accepting the offer (including the one offered orally) to provide them with information, services and the opportunity to participate in promotions, championships held by the Operator and / or in his interests, as well as by visiting sites / Operator's mobile applications. The acceptance of the offer is the provision by the Participants of the incentive events / championships of personal data requested by the Operator in specially developed questionnaires of the Participants of the incentive events / championships or in web forms on the websites / mobile applications of the Operator and / or its counterparties organizing and conducting promotions in the interests of the Operator and / or downloading "Everlegends" App belonging to the Operator in the App Store or Google Play

7.3. The consent of the subjects to the provision of their personal data is not required when the Operator receives, within the established powers, motivated requests from the prosecutor's office, law enforcement agencies, security agencies and other bodies authorized to request information in accordance with the current federal laws, as well as in the case provided for by the User agreement.

7.4. Consent to the processing of personal data can be revoked by the subject of personal data in accordance with the prescribed procedure in the User Agreement.

8. Rights of subjects of personal data

8.1. The subject of personal data has the right to receive information regarding the processing of his personal data. The subject of personal data has the right to demand that the Operator clarify his personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as take measures provided for by law to protect their rights. In case of any disagreement, the Russian version of the policy prevails. The personal data subject also has the right to revoke his / her consent to the processing of personal data in which case corresponding User Agreement provisions will be applied.

8.2. The subject of personal data has the right to contact the Operator with the requests provided for in clause 1 above in the ways listed below, including by:

8.2.1. sending messages to the Operator via info@everlegends.com

8.2.2. sending a letter to the Operator at the address LLC "CTT" Etalon ": 125284, Moscow, Leningradsky avenue, 29, suite 1-434.

9. Information on the implemented requirements for the protection of personal data

9.1. The protection of personal data processed by the Operator is ensured by the implementation of legal, organizational and technical measures necessary and sufficient to meet the requirements of legislation in the field of personal data protection. The specific measures applied by the Operator are fixed in the internal documents of the Operator and can be provided upon request.

9.2. Legal measures include:

- development of local acts of the Operator, implementing the requirements of Russian legislation, namely this Policy and related documents regarding the processing of personal data, and posting them on the Internet sites of the Operator;
- refusal of any methods of processing personal data that do not correspond to the purposes predetermined by the Operator.

9.3. Organizational measures include:

- appointment of a person responsible for organizing the processing of personal data;

- limiting the composition of the Operator's employees and other persons involved by the Operator in the processing of personal data, and organizing a permission system for accessing it;
- familiarization of the Operator's employees or other persons authorized for processing who directly process personal data with the provisions of the legislation of the Russian Federation on personal data, including the requirements for the protection of personal data, with the Operator's local acts on the processing of personal data, training of such employees;
- regulation of personal data processing processes;
- organization by the Operator and persons processing personal data on behalf of the Operator, accounting for material carriers of personal data and their storage, ensuring the prevention of theft, substitution, unauthorized copying and destruction;
- identification of threats to the security of personal data during their processing in information systems, the formation of threat models on their basis; the formation of a model of threats, the neutralization of which is provided by the persons who have been entrusted with the processing by the Operator, these persons carry it out independently;
- placement of technical means for processing personal data within the protected area;
- restricting the admission of unauthorized persons to the premises of the Operator, preventing them from being in the premises where the work with personal data is carried out and the technical means of their processing are located, without control from the Operator's Employees.

9.4. Technical measures include:

- determination of the type of threats to the security of personal data that are relevant to information systems of personal data, taking into account the assessment of possible harm to subjects of personal data that may be caused in case of violation of security requirements;
- determination of the level of protection of personal data and the implementation of requirements for the protection of personal data during their processing in information systems, the implementation of which ensures the established levels of protection of personal data;
- use of information protection tools that have passed the conformity assessment procedure to neutralize current threats;
- assessment of the effectiveness of measures taken to ensure the security of personal data;
- implementation of a permissive system of access to personal data processed in information systems, and software, hardware and software for information protection;
- registration and accounting of actions with personal data of users of information systems in which personal data is processed;
- detection of malicious software (use of anti-virus programs) at all nodes of the information network of the Operator and the person processing personal data on his behalf, providing the appropriate technical capability;
- secure interconnection (firewalling);
- detection of intrusions into the information system of the Operator and the person processing personal data on his behalf, violating or creating prerequisites for violating the established requirements for ensuring the security of personal data;
- recovery of personal data modified or destroyed as a result of unauthorized access to them (system of backup and recovery of personal data), including by a person who processes personal data on behalf of the Operator;

- periodic monitoring of user actions, proceedings on violations of personal data security requirements;
- control over the implementation of these requirements.
- **Final provisions**

10.1. Other obligations and rights of the Operator of personal data, as well as the conditions and principles of personal data processing are determined by the legislation of the Russian Federation in the field of personal data, as well as by the Policy of LLC "CTT "Etalon" (for more details, see paragraph 1 of this Policy).

10.2. The provisions of this Policy may be revised as necessary with the publication of appropriate changes. A mandatory revision of the Policy is carried out in the event of significant changes in international or national legislation in the field of personal data.

10.3. Additional information regarding the processing of personal data can be provided by the Operator upon request.

10.4. Personal data subjects provide their full and unconditional consent to all the terms and conditions of this Policy in accordance with clause 7.3. **In case of disagreement of personal data subjects with the provisions of this Policy, subjects should not provide their personal data to the Operator in the appropriate forms** and / or download the Everlegends application in the App Store or Google Play.

10.5. If there are any questions about these provisions, personal data subjects can contact the representatives of the Operator, including by:

10.5.1. sending messages to the Operator via
info@everlegends.com

10.5.2. sending a letter to the Operator LLC "CTT" Etalon" at the address: 125284, Moscow, Leningradsky prospect, 29, room 1-434.