

Policy on personal data processing

1. General Provisions

This policy of personal data processing is compiled in accordance with the requirements of the Federal Law of 27.07.2006. №152-Federal Law "About personal data" (hereinafter - Law on personal data) and determines the order of personal data processing and measures on providing of personal data security, taken by International Club "Golden Chariot" LLC (hereinafter - Operator).

1.1 The operator sets as its most important objective and condition of its activity the observance of human and civil rights and freedoms in the processing of personal data, including the protection of the rights to privacy, personal and family secrets.

1.2 The present Policy of the Operator regarding the processing of personal data (hereinafter - the Policy) applies to all information which the Operator can obtain about the visitors of the website <https://gcgaward.com>.

2. Basic concepts used in the Policy

2.1 Automated processing of personal data - processing of personal data by means of computer equipment.

2.2 Blocking of personal data - is temporary termination of processing of personal data (except when the processing is necessary to clarify personal data).

2.3 Website means a set of graphic and informational materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address <https://gcgaward.com>.

2.4 Personal Data Information System - a set of personal data contained in databases of personal data and information technologies and technical means ensuring their processing.

2.5 De-identification of personal data - actions, as a result of which it is impossible to determine, without using additional information, what personal data belongs to a particular User or other subject of personal data.

2.6 Processing of personal data - 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 (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.7 Operator - a state body, municipal authority, legal entity or individual, independently or jointly with other persons, arranging and/or carrying out processing of personal data, as well as determining the purpose of processing of personal data, composition of personal data to be processed, actions (operations) performed with personal data.

2.8 Personal data - any information relating directly or indirectly to a particular or defined User of the website <https://gcgaward.com>.

2.9. Personal data, authorized by the subject of personal data for distribution - personal data, access to which is provided by the subject of personal data by giving consent to the processing of

personal data, authorized by the subject of personal data for distribution in the manner prescribed by law on personal data (hereinafter - personal data, authorized for distribution).

2.10. User - any visitor to the <https://gcgaward.com> website.

2.11. Provision of personal data - actions aimed at disclosure of personal data to a certain person or a certain circle of people.

2.12. Dissemination of personal data - any action aimed at disclosure of personal data to an indefinite range of persons (transfer of personal data) or to familiarize the general public with personal data, including publication of personal data in the media, placement in information and telecommunications networks or providing access to personal data in any other way.

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

2.14. Destruction of personal data - any actions, as a result of which personal data is destroyed irretrievably with the impossibility of further restoration of personal data content in the information system of personal data and/or destruction of material media of personal data.

3. Basic rights and obligations of the Operator

3.1 The operator has the right:

- receive from the subject of personal data reliable information and/or documents containing personal data;
- In case the personal data subject withdraws consent to personal data processing, as well as in case of sending a request to terminate personal data processing, the Operator shall be entitled to continue processing of personal data without the consent of the personal data subject, if there are grounds specified in the Personal Data Law;
- Independently determine the composition and list of measures, necessary and sufficient to ensure the fulfillment of obligations stipulated by the Personal Data Law and regulations adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws.

3.2 The operator shall:

- Provide the subject of personal data, at his/her request, with information relating to the processing of his/her personal data;
- Organize processing of personal data in the manner prescribed by applicable laws of the Russian Federation;
- to respond to requests and inquiries of subjects of personal data and their legal representatives, in accordance with the requirements of the Law on Personal Data;
- Inform the authorized agency for protection of human subjects of personal data, at the request of such body, the necessary information within 10 days from the date of receipt of such request
- Publish or otherwise ensure unrestricted access to this Policy on personal data processing
- Take legal, organizational and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, supply, distribution of personal data, as well as other illegal actions in relation to personal data
- Cease the transfer (distribution, provision, access) of personal data, cease processing and destroy personal data in the manner and cases provided by the Personal Data Law
- Perform any other duties prescribed by the Personal Data Law.

4. The basic rights and obligations of subjects of personal data

4.1 The subjects of personal data have the right:

- To receive information relating to the processing of his personal data, except in cases provided for by federal laws. The information is provided to the subject of personal data by the operator in an accessible form, and it must not contain personal data relating to other subjects of personal data, except in cases where there are legitimate grounds for disclosure of such personal data. The list of information and the procedure for obtaining it is established by the Personal Data Law;
- to require the operator to 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 to take statutory measures to protect their rights;
- to put forward the condition of prior consent when processing personal data for the purpose of promoting goods, works and services on the market
- to withdraw the consent to the processing of personal data, as well as to request the cessation of personal data processing
- Appeal to the authorized body for protection of the rights of subjects of personal data or in court against unlawful acts or omissions of the Operator in the processing of his personal data
- To exercise other rights provided by the legislation of the Russian Federation.

4.2 Subjects of personal data shall:

- provide the Operator with reliable data about themselves;
- Inform the Operator of the clarification (updating, modification) of their personal data.

4.3 Persons, who provided the Operator with false information about themselves, or information about another subject of personal data without the consent of the latter, shall be liable in accordance with the laws of the Russian Federation.

5. Principles of personal data processing

5.1 Processing of personal data shall be lawful and fair.

5.2 Processing of personal data is limited to achieving specific, predetermined and legitimate purposes. Processing of personal data that is incompatible with the purposes for which personal data is collected is not permitted.

5.3 Databases containing personal data, which are processed for purposes incompatible with each other, shall not be combined.

5.4 Only personal data that meets the purposes of processing shall be processed.

5.5 The content and scope of processed personal data shall comply with the stated processing purposes. Processed personal data shall not be excessive in relation to the stated processing purposes.

5.6 When processing personal data, the accuracy of personal data, its sufficiency, and, if necessary, relevance in relation to the purpose of personal data processing shall be ensured. The operator shall take necessary measures and/or ensure that they are taken to remove or clarify incomplete or inaccurate data.

5.7 Personal data shall be stored in a form that makes it possible to identify the subject of personal data, no longer than required by the purposes of personal data processing, unless the

period of storage of personal data is established by federal law, a contract, a party to which, a beneficiary or a guarantor under which the subject of personal data is a party. Processed personal data shall be destroyed or depersonalized upon attainment of processing objectives or if it is no longer necessary to attain such objectives, unless otherwise provided for by federal law.

6. Purposes of personal data processing

Purpose of processing	Informing the User by sending e-mails
Personal information	<ul style="list-style-type: none"> • surname, first name, patronymic • electronic address • telephone numbers
Legal grounds	The contracts concluded between the operator and the subject of personal data
Types of processing of personal data	Sending informative letters to the e-mail address

7. Terms of processing of personal data

7.1 Processing of personal data shall be subject to the consent of the subject of personal data to process his/her personal data.

7.2 Processing of personal data is necessary to achieve the purposes provided for by an international treaty of the Russian Federation or by law, to perform the functions, powers and duties imposed on the operator by the legislation of the Russian Federation.

7.3 Processing of personal data is necessary for administration of justice, execution of a judicial act, act of another body or official to be executed in accordance with the legislation of the Russian Federation on enforcement proceedings.

7.4 Processing of personal data shall be necessary for execution of an agreement, a party to which or a beneficiary or guarantor under which the personal data subject is a party, as well as for conclusion of an agreement on the initiative of the personal data subject or an agreement, under which the personal data subject will be a beneficiary or guarantor.

7.5 Processing of personal data is necessary to exercise the rights and legitimate interests of the operator or third parties or to achieve socially important goals, provided that this does not violate the rights and freedoms of the subject of personal data.

7.6 Personal data shall be processed if access to such data is granted to an unlimited number of persons by or at the request of the personal data subject (hereinafter, "publicly available personal data").

7.7 Processing of personal data subject to publication or compulsory disclosure in accordance with the federal law.

8. Procedure for collection, storage, transfer and other processing of personal data

Security of personal data processed by the Operator is ensured by implementing legal, organizational and technical measures necessary to comply fully with the requirements of applicable laws in the field of personal data protection.

8.1 The operator provides safety of personal data and takes all possible measures, excluding access to personal data by unauthorized persons.

8.2 The personal data of the User shall never, under no circumstances be transferred to third parties, except in cases related to the execution of the current legislation or if the subject of personal data has given consent to the Operator to transfer data to a third party to fulfill obligations under a civil law contract.

8.3 In case of identification of inaccuracies in personal data, the User may update them independently, by sending a notice to the Operator's e-mail address office@gcgaward.com with a note "Updating of personal data".

8.4 The term of personal data processing is determined by achieving the purposes for which the personal data was collected, unless a different term is stipulated by the contract or by applicable law.

The user may withdraw their consent to the processing of personal data at any time by sending a notice via e-mail to the Operator's e-mail address office@gcgaward.com, marked "Withdrawal of consent to the processing of personal data".

8.5 All 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 persons (Operators) in accordance with their User Agreement and Privacy Policy. The subject of personal data and/or with the specified documents. The Operator shall not be liable for the actions of third parties, including the service providers mentioned in this clause.

8.6 The prohibitions established by the subject of personal data on the transfer (other than granting access), as well as on the processing or processing conditions (other than obtaining access) of personal data permitted for distribution shall not apply in cases of processing of personal data in state, public and other public interests as defined by Russian legislation.

8.7. The Operator shall ensure the confidentiality of personal data when processing personal data.

8.8. The operator shall store personal data in a form that allows to identify the subject of personal data, no longer than required by the purposes of personal data processing, unless the period of storage of personal data is established by federal law, a contract, a party to which, a beneficiary or a guarantor under which the subject of personal data is.

8.9 A condition for termination of personal data processing may be achievement of personal data processing objectives, expiration of the personal data subject's consent, withdrawal of consent by the personal data subject or a requirement to terminate personal data processing, as well as identification of unlawful personal data processing.

9. The list of actions made by the Operator with the received personal data

9.1. The operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distribution, provision, access), depersonalizes, blocks, deletes and destroys personal data.

9.2 The operator carries out automated processing of personal data with or without receipt and/or transmission of received information via information and telecommunications networks.

10. Cross-border transfer of personal data

10.1 The operator is obliged to notify the competent authority for protection of personal data subjects' rights about its intention to transfer personal data across borders (such notification is sent separately from the notification about the intention to process personal data) before starting the transborder transfer of personal data.

10.2 Before submitting the above notification, the operator must obtain the relevant information from the foreign authorities, foreign individuals, foreign legal entities to which the trans-border transfer of personal data is planned.

11. Confidentiality of personal data

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

12. Final provisions

12.1 The User can obtain any clarifications on questions of interest regarding the processing of their personal data by contacting the Operator by e-mail at office@gcgaward.com.

12.2 This document will reflect any changes in the personal data processing policy of the Operator. The Policy is valid indefinitely until it is replaced by a new version.

12.3. The current version of the Policy is freely available on the Internet at <https://gcgaward.com/privacy>.