

## Privacy Policy

Moscow

December 01, 2025

This Personal Data Processing Policy (hereinafter referred to as the **Privacy Policy**) has been developed in accordance with Federal Law No. 152-FZ dated July 27, 2006 “On Personal Data” (hereinafter referred to as **Federal Law No. 152-FZ**) and defines the procedure for processing personal data and the measures to ensure the security of personal data of KMA.biz (hereinafter referred to as the **Operator**).

This Privacy Policy applies to all information that the Operator — KMA.biz — may obtain about visitors to the website on the Internet at: <https://kma.biz/> (hereinafter referred to as the **Website**).

All matters related to the processing of personal data that are not regulated by this Privacy Policy shall be resolved in accordance with the applicable legislation of the Russian Federation in the field of personal data.

The following basic terms are used in this Privacy Policy:

**Automated processing of personal data** — processing of personal data using computer equipment;

**Blocking of personal data** — temporary suspension of the processing of personal data (except where processing is necessary to clarify personal data);

**Personal data information system** — a set of personal data contained in databases, as well as information technologies and technical means ensuring their processing;

**Depersonalization of personal data** — actions as a result of which it becomes impossible, without the use of additional information, to determine the ownership of personal data by a specific personal data subject;

**Processing of personal data** — any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data;

**Operator** — a legal entity or an individual who independently or jointly with other persons organizes and/or carries out the processing of personal data, as well as determines the purposes of processing personal data, the composition of personal data subject to processing, and the actions (operations) performed with personal data;

**Personal data** — any information relating to an identified or identifiable natural person (personal data subject), directly or indirectly;

**User** — any visitor to the Website, potential client, personal data subject;

**Provision of personal data** — actions aimed at disclosing personal data to a specific person or a specific group of persons;

**Distribution of personal data** — actions aimed at disclosing personal data to an indefinite

group of persons (transfer of personal data) or at making personal data available to an unlimited number of persons, including publication of personal data in mass media, placement in information and telecommunication networks, or granting access to personal data in any other way;

**Destruction of personal data** — actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and/or as a result of which tangible media containing personal data are destroyed;

**Cookie file** — a small fragment of data, often containing a unique anonymous identifier, sent by a web server and stored on the User's device hard drive. The web client (usually a web browser) sends this data fragment to the web server as part of an HTTP request each time it attempts to open a website page.

## 1. GENERAL PROVISIONS

1.1. Within the framework of this Privacy Policy, the User's personal information shall mean:

1.1.1. Personal information that the User provides about himself/herself independently during registration (creation of an account) or in the course of using the services, including the User's personal data. Information required for the provision of services is marked in a special manner.

1.1.2. Data that are automatically transmitted to the Website services during their use by means of software installed on the User's device, including the IP address, cookie data, information about the User's browser (or other software used to access the services), technical characteristics of the equipment and software used by the User, the date and time of access to the services, addresses of requested pages, and other similar information.

1.1.3. This Privacy Policy applies to the website page <https://kma.biz/>. The Operator does not control and is not responsible for third-party websites to which the User may be redirected via links available on the Contractor's website.

1.1.4. The Operator may process the following personal data of the User:

№	General
1	Surname, first name, patronymic
2	Telephone number
3	Email address
4	Telegram username

The above-listed data are hereinafter collectively referred to as **Personal Data**.

1.2. The processing of personal data shall be carried out in compliance with the following principles:

1.2.1. Personal data shall be processed on a lawful and fair basis.

1.2.2. The processing of personal data shall be limited to the achievement of specific, pre-determined, and lawful purposes defined in clause 2.2 of this Privacy Policy. Processing of personal data that is incompatible with the purposes of personal data collection shall not be permitted.

1.2.3. The merging of databases containing personal data processed for purposes that are

incompatible with each other shall not be permitted.

1.2.4. Only personal data that meet the purposes of their processing shall be subject to processing.

1.2.5. The content and scope of the processed personal data shall correspond to the stated purposes of processing. The processed personal data shall not be excessive in relation to the stated purposes of their processing.

1.2.6. When processing personal data, their accuracy, sufficiency, and, where necessary, relevance to the purposes of personal data processing shall be ensured. The Operator shall take necessary measures or ensure their implementation to delete or clarify incomplete or inaccurate data.

1.2.7. Personal data shall be stored in a form that allows identification of the personal data subject for no longer than is required by the purposes of personal data processing, unless a different retention period is established by federal law or by a contract to which the personal data subject is a party, beneficiary, or guarantor. The processed personal data shall be destroyed or depersonalized upon achievement of the purposes of processing or in the event that the need to achieve such purposes is no longer relevant, unless otherwise provided by federal law.

1.2.8. Certain content or applications on the Website, including advertising materials, may be serviced by independent third parties. These third parties may place cookies on the User's device for their own purposes. The Website does not control the tracking technologies used by such third parties or how they may be used and shall not be responsible for any actions or policies of third parties. The User may prevent the placement of such third-party cookies and tracking by appropriately adjusting or changing the settings of their browser. For additional information, the User should refer to the instructions of their browser.

## **2. PURPOSES OF PROCESSING USERS' PERSONAL INFORMATION**

2.1. The Operator's website <https://kma.biz/> collects and stores only such personal information as is necessary for the provision of services or for the performance of agreements and contracts with the User, except in cases where the legislation requires mandatory storage of personal information for a period established by law.

2.2. The Website processes the User's personal information for the following purposes:

2.2.1. Conclusion and performance of the Offer Agreement;

2.2.2. Promotion of goods, works, and services on the market.

<b>Purposes</b>	<b>Categories of Data Subjects</b>	<b>List of Personal Data</b>	<b>Categories of Personal Data</b>	<b>Methods, Duration of Processing and Storage</b>	<b>Procedure for Destruction of Personal Data</b>
Conclusion and performance of the Offer Agreement	Website visitors, potential clients	1. Surname, first name, patronymic 2. Telephone number 3. Email address 4. Telegram messenger username	General	Consent to the processing of personal data remains valid until its withdrawal. The methods of processing are specified in clause 3.4 of this	The procedure for destruction of personal data is specified in clause 4.2.8 of this Privacy

				Privacy Policy.	Policy.
Promotion of goods, works, and services on the market	Website visitors, potential clients	1. Surname, first name, patronymic 2. Telephone number 3. Email address 4. Telegram messenger username	General	Consent to the processing of personal data remains valid until its withdrawal. The methods of processing are specified in clause 3.4 of this Privacy Policy.	The procedure for destruction of personal data is specified in clause 4.2.8 of this Privacy Policy.
Registration on the Website in a personal account	Website visitors, chatbot users, potential clients, clients	1. Surname, first name, patronymic 2. Telephone number 3. Email address 4. Telegram messenger username	General	Consent to the processing of personal data remains valid until its withdrawal. The methods of processing are specified in clause 3.4 of this Privacy Policy.	The procedure for destruction of personal data is specified in clause 4.2.8 of this Privacy Policy.

The collection, processing, and storage of the User's personal data are carried out by the Operator using databases located within the territory of the Russian Federation.

### 3. TERMS OF PROCESSING USERS' PERSONAL INFORMATION AND ITS TRANSFER TO THIRD PARTIES

3.1. The website <https://kma.biz/> stores Users' personal information in accordance with the internal regulations of the respective services.

3.2. The confidentiality of the User's personal information shall be maintained, except in cases where the User voluntarily provides information about himself/herself for public access to an unlimited number of persons. When using certain services, the User agrees that a certain part of his/her personal information becomes publicly available.

The Operator has the right to entrust the processing of personal data to another person with the consent of the personal data subject, unless otherwise provided by federal law, on the basis of a contract concluded with such person, including a state or municipal contract, or by the adoption of a relevant act by a state or municipal authority (hereinafter referred to as the **Operator's Instruction**). The person processing personal data on behalf of the Operator shall be obliged to comply with the principles and rules of personal data processing provided for by Federal Law No. 152-FZ, to ensure the confidentiality of personal data, and to take the necessary measures aimed at fulfilling the obligations established by Federal Law No. 152-FZ.

The Operator's Instruction must specify:

- the list of personal data;
- the list of actions (operations) with personal data to be performed;
- the purposes of personal data processing;
- the obligation to maintain the confidentiality of personal data;
- the requirements provided for by Part 5 of Article 18 and Article 18.1 of Federal Law No. 152-FZ;
- the obligation, at the Operator's request, during the validity period of the instruction (including prior to processing), to provide documents and other information confirming the adoption of measures and compliance with the requirements established by this article;
- the obligation to ensure the security of personal data during processing;
- the requirements for the protection of processed personal data in accordance with Article 19 of Federal Law No. 152-FZ, including the requirement to notify the Operator of cases provided for by Part 3.1 of Article 21 of Federal Law No. 152-FZ.

A person processing personal data on behalf of the Operator is not required to obtain the consent of the personal data subject for the processing of such personal data.

If the Operator entrusts the processing of personal data to another person, the Operator shall bear responsibility to the personal data subject for the actions of such person. The person processing personal data on behalf of the Operator shall bear responsibility to the Operator.

If the Operator entrusts the processing of personal data to a foreign individual or a foreign legal entity, responsibility to the personal data subject for the actions of such persons shall be borne jointly by the Operator and the person processing personal data on behalf of the Operator.

The Operator has the right to transfer the User's personal information to other third parties in the following cases:

3.3.1. The User has given consent to such actions.

3.3.2. The transfer is necessary for the User to use a specific service or for the performance of a specific agreement or contract with the User.

3.3.4. The transfer is provided for by Russian or other applicable legislation within the framework of the procedure established by law.

3.3.5. In the event of the sale of the Operator's Website, all obligations to comply with the terms of this Privacy Policy with respect to the personal information received shall be transferred to the purchaser.

3.4. The processing of the User's personal data is carried out without limitation of time by the following methods: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data, including within personal data information systems using automation tools or without using such tools.

The processing of Users' personal data is carried out in accordance with Federal Law No. 152-FZ.

3.5. In the event of loss or disclosure of personal data, the Operator shall notify the User of such loss or disclosure.

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

3.7. The Operator, together with the User, takes all necessary measures to prevent losses or other adverse consequences caused by the loss or disclosure of the User's personal data.

### 3.8. Cross-Border Transfer of Personal Data

Prior to initiating a cross-border transfer of personal data, the Operator shall ensure that the foreign state to whose territory the transfer is intended provides adequate protection of the rights of personal data subjects.

Cross-border transfer of personal data to the territories of foreign states that do not provide adequate protection of the rights of personal data subjects may be carried out in the following cases:

- if the personal data subject has given written consent to the cross-border transfer of his/her personal data;
- if the transfer is necessary for the performance of a contract to which the personal data subject is a party.

3.9. The Operator processes the User's personal data only if such data are completed and/or submitted by the User independently through special forms located on the website at <https://kma.biz/>. By completing the relevant forms and/or submitting personal data to the Operator, the User expresses consent to this Privacy Policy. The User shall be deemed to have given consent to the processing of personal data entered into the form fields at the moment of checking the checkbox (in the input field) on the Website next to text such as "I consent to the processing of my personal data in accordance with the terms of the Privacy Policy" or similar wording, provided that the personal data subject is given the opportunity to review the full text of this Privacy Policy at each point of personal data collection.

The personal data subject makes the decision to provide personal data and gives consent to their processing freely, of his/her own will and in his/her own interest. Consent to the processing of personal data is specific, informed, conscious, and unambiguous.

In cases provided for by Federal Law No. 152-FZ, personal data processing is carried out only with the written consent of the personal data subject. Consent in the form of an electronic document signed with an electronic signature in accordance with federal law shall be recognized as equivalent to written consent on paper bearing the handwritten signature of the personal data subject. Written consent to the processing of personal data must include, in particular:

- 1) surname, first name, patronymic, address of the personal data subject, details of the identity document, date of issue and issuing authority;
- 2) surname, first name, patronymic, address of the representative of the personal data subject, identity document details, date of issue and issuing authority, and details of the power of attorney or other document confirming authority (if consent is obtained from a representative);
- 3) name and address of the Operator receiving the consent;
- 4) purpose of personal data processing;
- 5) list of personal data for which consent is given;
- 6) name and address of the person processing personal data on behalf of the Operator (if applicable);
- 7) list of actions with personal data and a general description of processing methods;
- 8) validity period of the consent and the procedure for its withdrawal, unless otherwise provided by federal law;
- 9) signature of the personal data subject.

Biometric personal data (data characterizing physiological and biological features allowing identification of a person) may be processed only with the written consent of the personal data subject, except in cases provided for by Part 2 of Article 11 of Federal Law No. 152-FZ.

Consent to the processing of personal data shall be valid from the date of its signing until the date of its withdrawal in written or electronic form.

Consent may be withdrawn by the personal data subject. Upon withdrawal of consent, the Operator has the right to continue processing personal data without consent if there are grounds specified in clauses 2–11 of Part 1 of Article 6, Part 2 of Article 10, and Part 2 of Article 11 of Federal Law No. 152-FZ.

Upon receipt of a notice of withdrawal of consent, the Website shall cease processing the User's personal data within a period not exceeding ten (10) business days from the date of receipt.

The notice of withdrawal of consent shall be sent to the email address specified on the website <https://kma.biz/>.

### 3.10. Right of the Personal Data Subject to Access Personal Data

3.10.1. The personal data subject has the right to obtain the information specified in clause 3.10.7 of this Privacy Policy and may require the Operator to clarify, block, or destroy personal data if such data are incomplete, outdated, inaccurate, unlawfully obtained, or not necessary for the stated purpose of processing, as well as to take statutory measures to protect his/her rights.

3.10.2. The information specified in clause 3.10.7 shall be provided by the Operator in an accessible form and shall not contain personal data relating to other personal data subjects, except where lawful grounds for such disclosure exist.

3.10.3. The information specified in clause 3.10.7 of this Privacy Policy shall be provided by the Operator to the personal data subject or his/her representative within ten (10) business days from the date of the request or from the date the Operator receives the request of the personal data subject or his/her representative. The specified period may be extended, but by no more than five (5) business days, if the Operator sends a reasoned notice to the personal data subject indicating the reasons for extending the deadline for providing the requested information. The request must contain the number of the primary identity document of the personal data subject or his/her representative, information on the date of issuance of such document and the issuing authority, information confirming the participation of the personal data subject in relations with the Operator (contract number, date of conclusion of the contract, conditional verbal designation and/or other information), or other information confirming the fact that the Operator processes the personal data, as well as the signature of the personal data subject or his/her representative. The request may be submitted in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation. The Operator shall provide the information specified in clause 3.10.7 of this Privacy Policy to the personal data subject or his/her representative in the same form in which the relevant request was submitted, unless otherwise specified in the request.

3.10.4. If the information specified in clause 3.10.7 of this Privacy Policy, as well as the processed personal data, were provided to the personal data subject for review upon his/her request, the personal data subject shall have the right to re-apply to the Operator or submit a repeated request in order to obtain the information specified in clause 3.10.7 of this Privacy Policy and to review such personal data not earlier than thirty (30) days after the initial request or submission of the initial request, unless a shorter period is established by federal law, a regulatory legal act adopted pursuant thereto, or a contract to which the personal data subject is a party, beneficiary, or guarantor.

3.10.5. The personal data subject shall have the right to re-apply to the Operator or submit a repeated request to obtain the information specified in clause 3.10.7 of this Privacy Policy, as well as to review the processed personal data prior to the expiration of the period specified in clause 3.10.4 of this Privacy Policy, if such information and/or processed personal data were not provided to him/her for review in full as a result of consideration of the initial request. In addition to the information specified in clause 3.10.3 of this Privacy Policy, the repeated request must contain a justification for submitting the repeated request.



3.10.6. The Operator shall have the right to refuse to fulfill a repeated request of the personal data subject that does not meet the conditions provided for in clauses 3.10.4 and 3.10.5 of this Privacy Policy. Such refusal must be reasoned. The burden of proving the validity of the refusal to fulfill the repeated request shall lie with the Operator.

3.10.7. The personal data subject has the right to obtain information relating to the processing of his/her personal data, including information containing:

- 1) confirmation of the fact that the Operator processes personal data;
- 2) the legal grounds and purposes of personal data processing;
- 3) the purposes and methods of personal data processing applied by the Operator;
- 4) the name and location of the Operator, as well as information about persons (excluding the Operator's employees) who have access to personal data or to whom personal data may be disclosed on the basis of a contract with the Operator or on the basis of federal law;
- 5) the personal data being processed relating to the relevant personal data subject, the source of their receipt, unless a different procedure for providing such data is established by federal law;
- 6) the periods of personal data processing, including storage periods;
- 7) the procedure for the personal data subject to exercise the rights provided for by Federal Law No. 152-FZ;
- 8) information on completed or intended cross-border transfers of data;
- 9) the name or surname, first name, patronymic, and address of the person processing personal data on behalf of the Operator, if processing has been or will be entrusted to such person;
- 9.1) information on the methods by which the Operator fulfills the obligations established by Article 18.1 of Federal Law No. 152-FZ;
- 10) other information provided for by Federal Law No. 152-FZ or other federal laws.

3.11. The processing of personal data for the purpose of promoting goods, works, and services on the market by means of direct contact with a potential consumer using communication facilities shall be permitted only with the prior consent of the personal data subject.

At the request of the personal data subject, the Operator shall immediately cease processing his/her personal data for the purpose of promoting goods, works, and services on the market by means of direct contact with a potential consumer using communication facilities.

#### **4. OBLIGATIONS OF THE PARTIES**

4.1. The User shall be obliged to:

4.1.1. Provide personal data information necessary for the provision of consulting and informational services.

4.1.2. Update and supplement the provided personal data information in the event of any changes thereto.

4.2. The Operator shall be obliged to:

4.2.1. When collecting personal data, upon the request of the personal data subject, provide the information specified in clause 3.10.7 of this Privacy Policy.

4.2.2. When collecting personal data, including through information and telecommunication networks (the Internet), ensure the recording, systematization, accumulation, storage, clarification (updating, modification), and retrieval of personal data of citizens of the Russian Federation using databases located within the territory of the Russian Federation, except for the cases specified in clauses 2, 3, 4, and 8 of Part 1 of Article 6 of Federal Law No. 152-FZ.

4.2.3. Take measures that are necessary and sufficient to ensure compliance with the



obligations provided for by Federal Law No. 152-FZ and regulatory legal acts adopted in accordance therewith. The Operator independently determines the composition and list of measures that are necessary and sufficient to ensure compliance with the obligations provided for by Federal Law No. 152-FZ and regulatory legal acts adopted in accordance therewith.

The Operator shall take the following necessary and sufficient measures to ensure compliance with such obligations:

- 1) appointment of a person responsible for organizing the processing of personal data;
- 2) issuance of documents defining the Operator's policy regarding the processing of personal data, as well as local regulations on personal data processing matters, defining for each purpose of personal data processing the categories and list of personal data processed, categories of personal data subjects, methods, time limits for processing and storage, and the procedure for destruction of personal data upon achievement of processing purposes or upon occurrence of other lawful grounds, as well as local regulations establishing procedures aimed at preventing and detecting violations of the legislation of the Russian Federation and eliminating the consequences of such violations;
- 3) application of legal, organizational, and technical measures to ensure the security of personal data in accordance with Article 19 of Federal Law No. 152-FZ;
- 4) implementation of internal control and/or audit of compliance of personal data processing with Federal Law No. 152-FZ, regulatory legal acts adopted in accordance therewith, requirements for personal data protection, the Operator's personal data processing policy, and the Operator's local regulations;
- 5) assessment of harm in accordance with the requirements established by the authorized body for the protection of the rights of personal data subjects that may be caused to personal data subjects in the event of violation of Federal Law No. 152-FZ, and assessment of the correlation between such harm and the measures taken by the Operator to ensure compliance with obligations provided for by Federal Law No. 152-FZ;
- 6) familiarization of the Operator's employees directly involved in the processing of personal data with the provisions of the legislation of the Russian Federation on personal data, including requirements for personal data protection, documents defining the Operator's personal data processing policy, local regulations on personal data processing matters, and/or training of such employees.

#### 4.2.4. Publish or otherwise ensure unrestricted access to this Privacy Policy.

An Operator collecting personal data using information and telecommunication networks shall publish, in the relevant information and telecommunication network, including on the pages of the Operator's website on the Internet through which personal data are collected, a document defining its policy regarding the processing of personal data and information on implemented requirements for personal data protection, and shall ensure access to such document using the means of the relevant information and telecommunication network.

4.2.5. Block personal data relating to the relevant User from the moment of receipt of a request or inquiry from the User, his/her legal representative, or the authorized body for the protection of the rights of personal data subjects for the period of verification in the event that inaccurate personal data or unlawful actions are identified.

4.2.6. When processing personal data, the Operator shall take the necessary legal, organizational, and technical measures or ensure that such measures are taken to protect personal data from unlawful or accidental access, destruction, modification, blocking, copying, provision, dissemination, as well as from other unlawful actions in relation to personal data.

Ensuring the security of personal data is achieved, in particular, by:

- 1) identifying threats to the security of personal data during their processing in personal data information systems;
- 2) applying organizational and technical measures to ensure the security of personal data

during their processing in personal data information systems, necessary to meet personal data protection requirements, the implementation of which ensures the levels of personal data security established by the Government of the Russian Federation;

3) using information security tools that have passed the conformity assessment procedure in the prescribed manner;

4) assessing the effectiveness of the measures taken to ensure the security of personal data prior to commissioning a personal data information system;

5) accounting for machine-readable media containing personal data;

6) detecting instances of unauthorized access to personal data and taking measures, including measures to detect, prevent, and eliminate the consequences of computer attacks on personal data information systems and to respond to computer incidents therein;

7) restoring personal data modified or destroyed as a result of unauthorized access;

8) establishing rules for access to personal data processed in personal data information systems, as well as ensuring the registration and logging of all actions performed with personal data in personal data information systems;

9) monitoring the measures taken to ensure the security of personal data and the level of protection of personal data information systems.

Threats to the security of personal data shall mean a combination of conditions and factors creating a risk of unauthorized, including accidental, access to personal data, the result of which may be the destruction, modification, blocking, copying, provision, dissemination of personal data, as well as other unlawful actions during their processing in personal data information systems.

The level of protection of personal data shall mean an integrated indicator characterizing the requirements whose fulfillment ensures the neutralization of certain threats to the security of personal data during their processing in personal data information systems.

4.2.7. The Operator or its authorized representative shall be responsible for the processing of personal data.

The Operator shall be obliged to:

1) exercise internal control over compliance with the legislation of the Russian Federation on personal data, including requirements for personal data protection;

2) organize the receipt and processing of inquiries and requests from personal data subjects or their representatives and/or exercise control over the receipt and processing of such inquiries and requests.

4.2.8. If it is revealed that personal data processing is carried out unlawfully, the Operator shall cease the processing of personal data within a period not exceeding three (3) business days from the date such violation is identified.

If it is impossible to ensure the lawfulness of personal data processing, the Operator shall destroy such personal data or ensure their destruction within a period not exceeding ten (10) business days from the date the unlawful processing is identified.

The Operator shall notify the individual (or his/her representative) of the elimination of the violations or of the destruction of personal data, as well as Roskomnadzor, if the inquiry (request) was received from it.

If the purposes of personal data processing have been achieved, the Operator shall cease processing personal data or ensure its cessation (if personal data are processed by another person acting on behalf of the Operator) and shall destroy the personal data or ensure their destruction (if personal data are processed by another person acting on behalf of the Operator) within a period not exceeding thirty (30) days from the date the processing purposes are achieved.

If the personal data subject withdraws consent to the processing of his/her personal data, the Operator shall cease processing such data or ensure cessation of such processing (if personal

data are processed by another person acting on behalf of the Operator). If the retention of personal data is no longer required for processing purposes, the Operator shall destroy such data or ensure their destruction (if personal data are processed by another person acting on behalf of the Operator) within a period not exceeding thirty (30) days from the date of receipt of the withdrawal.

If the personal data subject submits a request to cease the processing of personal data, the Operator shall cease such processing or ensure its cessation within ten (10) business days from the date of receipt of the request. This period may be extended by no more than five (5) business days upon sending a reasoned notice explaining the reasons for the extension (Part 5.1 of Article 21 of Federal Law No. 152-FZ).

If the personal data subject submits a request to cease the processing of personal data permitted for dissemination, the Operator shall cease the transfer, dissemination, provision of such data, and access thereto. The consent of the personal data subject to the processing of personal data permitted for dissemination shall terminate from the moment such request is received.

If it is impossible to destroy personal data within the established period, the Operator shall block such personal data or ensure their blocking and shall ensure their destruction within a period not exceeding six (6) months. A different period may be established by federal laws.

Destruction shall mean actions as a result of which it becomes impossible to restore the content of personal data in personal data information systems and/or as a result of which material media containing personal data are destroyed. If personal data were processed in a non-automated manner, they may be destroyed by burning, shredding (crushing), or chemical decomposition.

The destruction of personal data by the Operator is confirmed by the following documents (clauses 1, 2, and 7 of the Requirements approved by Order of Roskomnadzor No. 179 dated October 28, 2022):

a **certificate (act) of destruction** — if personal data are processed without the use of automation tools;

a **certificate (act) of destruction and an extract from the event log of the personal data information system** — if personal data are processed using automation tools or if both methods of processing are used simultaneously.

The certificate (act) of destruction of personal data must contain, in particular (clause 3 of the Requirements No. 179):

the name of the legal entity and the address of the Operator; the surname, first name, patronymic (if any), position, and signature of the person(s) who destroyed the personal data of the subject; the list of categories of destroyed personal data; the method and reason for their destruction;

the name of the destroyed tangible medium containing the personal data of the subject, indicating the number of sheets of each tangible medium (when processing personal data without the use of automation tools);

the name of the personal data information system from which the personal data of the subject were destroyed (when processing personal data using automation tools).

An electronic certificate (act), duly signed in accordance with the установленный procedure, shall be deemed equivalent to a paper-based certificate signed with handwritten signatures of the persons who destroyed the data (clause 4 of the Requirements No. 179).

## 5. LIABILITY OF THE PARTIES

5.1. If a personal data subject believes that the Operator processes his/her personal data in violation of the requirements of Federal Law No. 152-FZ or otherwise violates his/her rights

and freedoms, the personal data subject shall have the right to appeal against the actions or inaction of the Operator to the authorized body for the protection of the rights of personal data subjects or in court.

The personal data subject has the right to protection of his/her rights and lawful interests, including compensation for losses and/or moral (non-pecuniary) damage in court. The Operator that has failed to fulfill its obligations shall be liable for losses incurred by the User as a result of unlawful use of personal data in accordance with the legislation of the Russian Federation.

The assessment of harm that may be caused to personal data subjects in the event of violation by the Operator of the requirements of Federal Law No. 152-FZ shall be determined in accordance with Articles 15, 151, 152, and 1101 of the Civil Code of the Russian Federation.

Moral (non-pecuniary) damage caused to a personal data subject as a result of violation of his/her rights, violation of the rules for personal data processing established by Federal Law No. 152-FZ, as well as requirements for personal data protection established in accordance with Federal Law No. 152-FZ, shall be subject to compensation in accordance with the legislation of the Russian Federation. Compensation for moral damage shall be made independently of compensation for property damage and losses incurred by the personal data subject.

5.2. In the event of loss or disclosure of confidential information, the Operator shall not be liable if such confidential information:

5.2.1. Became publicly available prior to its loss or disclosure;

5.2.2. Was obtained from a third party before it was received by the Operator;

5.2.3. Was disclosed with the consent of the User.

## **6. DISPUTE RESOLUTION**

6.1. Prior to filing a lawsuit in court regarding disputes arising from the relationship between the Website User and the Operator, the submission of a claim (a written proposal for voluntary settlement of the dispute) shall be mandatory.

6.2. The recipient of the claim shall, within seven (7) calendar days from the date of receipt of the claim, notify the claimant in writing of the results of the consideration of the claim.

6.3. If no agreement is reached, the dispute shall be referred to a court for consideration in accordance with the applicable legislation of the Russian Federation.

6.4. The applicable legislation of the Russian Federation shall govern this Privacy Policy and the relationship between the User and the Operator.

## **7. ADDITIONAL TERMS**

7.1. The Operator shall have the right to amend this Privacy Policy without the User's consent.

7.2. The new version of the Privacy Policy shall enter into force from the moment it is published on the Website, unless otherwise provided by the new version of the Privacy Policy.

7.3. All proposals or questions regarding this Privacy Policy shall be sent to the email address specified on the website <https://kma.biz/>.

7.4. The current version of the Privacy Policy is published on the Internet at: <https://kma.biz/>.