

# Personal Data Processing Policy

Moscow

"08" August 2025

## 1. GENERAL PROVISIONS

1.1. This document (hereinafter - the Policy) defines the policy regarding the processing of personal data of users of the Artificial Intelligence Relations website of the Limited Liability Company "KSII" (hereinafter - the Operator) in the information and telecommunications network Internet at the address: <https://airelations.ru/> (hereinafter - the Site).

1.2. This Policy has been developed on the basis of clause 2, part 1, art. 18.1 of the Federal Law of July 27, 2006 N 152-FZ "On Personal Data," as well as the Recommendations for the drafting of a document defining the operator's policy regarding the processing of personal data, in the manner established by the Federal Law of July 27, 2006 N 152-FZ "On Personal Data."

1.3. In compliance with the requirements of part 2 of art. 18.1 of the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data," the Policy is published in the public domain in the information and telecommunications network Internet at: <https://airelations.ru/>.

1.4. This Privacy Policy applies only to the Site. The Operator does not control and is not responsible for third-party sites to which the User may go via links available on the Site.

1.5. The concepts contained in Art. 3 of the Federal Law of July 27, 2006 N 152-FZ "On Personal Data" are used in this Policy with a similar meaning.

1.6. The following terms are also used in this Policy:

**User** — any person using the Site, information, materials and services of the Site. The User of the Site is a subject of personal data within the meaning of the Federal Law of July 27, 2006 N 152-FZ "On Personal Data".

**Site (website)** — is a set of related web pages, available on the Internet and united under one domain name. Web pages may contain text, images, video, audio and other multimedia elements.

1.7. Rights and obligations of the Operator.

1.7.1. The Operator is obliged to:

- process personal data exclusively for the purposes specified in the Policy, in the manner prescribed by the current legislation of the Russian Federation, and take necessary and sufficient measures to ensure the fulfillment of the obligations stipulated by the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data" and the normative legal acts adopted in accordance with it;
- not to distribute personal data without the User's consent, unless otherwise provided by the current legislation of the Russian Federation;
- process personal data in compliance with the principles and rules provided for by the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data";
- organize the protection of personal data in accordance with the requirements of the legislation of the Russian Federation;

- consider the appeals of the User (his/her legal representative) on the issues of personal data processing and provide reasoned answers;
- provide the User (his/her legal representative) with the possibility of free access to his/her personal data;
- take measures to clarify, block, destroy the User's personal data in cases established by the Federal Law of July 27, 2006 N 152-FZ "On Personal Data".

#### 1.7.2. The Operator has the right to:

- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data" and the normative legal acts adopted in accordance with it, unless otherwise provided by the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data" or other federal laws;
- entrust the processing of personal data to another person with the consent of the User, unless otherwise provided by federal law, on the basis of a contract concluded with that person, including a state or municipal contract, or by the adoption by a state or municipal body of a relevant act;
- in case the User withdraws his/her consent to the processing of personal data, continue processing personal data without the User's consent on the grounds specified in the Federal Law of July 27, 2006 N 152-FZ "On Personal Data";
- receive from the User reliable information and/or documents containing the User's personal data for the processing purposes specified in cl. 2.2 of the Policy;
- require the User to timely clarify the provided personal data.

### 1.8. Rights and obligations of the User.

#### 1.8.1. The User is obliged to:

- ensure the accuracy of the personal data provided to the Operator, necessary for the processing purposes provided for in cl. 2.2 of the Policy;
- provide the Operator with information for clarification (updating, modification) of the provided personal data, if necessary.

#### 1.8.2. The User has the right to:

- full information concerning the processing of his/her personal data by the Operator, except for cases provided for by the legislation of the Russian Federation;
- clarification of his/her personal data, its blocking or destruction in cases where the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing;
- withdrawal of consent to the processing of personal data;
- taking measures provided for by law to protect their rights;
- appealing to the authorized body for the protection of the rights of subjects of personal data or in court against unlawful actions or inaction of the Operator in the processing of his/her personal data;

The Operator and Users also have other rights and bear other obligations stipulated by the legislation of the Russian Federation.

## 2. PURPOSES OF PERSONAL DATA PROCESSING

2.1. The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. The processing of personal data that is incompatible with the purposes of collecting personal data is not permitted. The processed personal data must not be excessive in relation to the stated purposes of their processing.

2.2. Only personal data that meets the purposes of their processing are subject to processing, namely:

- informing the User by sending e-mails;
- conclusion, execution and termination of civil law contracts;
- providing the User with access to the services, information and/or materials contained on the Site.

### **3. LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA**

3.1. The legal grounds for the processing of personal data by the Operator are:

- The Constitution of the Russian Federation;
- The Civil Code of the Russian Federation;
- Federal Law of July 27, 2006 N 149-FZ "On Information, Information Technologies and Information Protection";
- Federal Law of December 26, 2008 N 294-FZ "On the Protection of the Rights of Legal Entities and Individual Entrepreneurs in the Exercise of State Control (Supervision) and Municipal Control";
- Decree of the President of the Russian Federation of March 6, 1997 No. 188 "On the Approval of the List of Confidential Information";
- Decree of the Government of the Russian Federation of November 1, 2012 N 1119 "On the Approval of the Requirements for the Protection of Personal Data during their Processing in Personal Data Information Systems";
- Order of the FSTEC of Russia of February 18, 2013 No. 21 "On the Approval of the Composition and Content of Organizational and Technical Measures to Ensure the Security of Personal Data during their Processing in Personal Data Information Systems";
- consent to the processing of personal data on the Site.

### **4. SCOPE AND CATEGORIES OF PROCESSED PERSONAL DATA, CATEGORIES OF PERSONAL DATA SUBJECTS**

4.1. The Operator may process the personal data of the following Users: users of the Operator's Site.

4.2. The personal data processed by the Operator includes the following personal data:

- Last name, first name, patronymic;
- Mobile phone;
- Email address.

4.3. The Operator ensures that the content and volume of the processed personal data correspond to the stated purposes of processing, as provided for in section 2 of the Policy.

4.4. The processing of biometric personal data, special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, intimate life, by the Operator is not carried out.

4.5. The Site also collects and processes anonymized data about visitors (including "cookie" files) using Internet statistics services (Yandex Metrica, Google Analytics).

## **5. PROCEDURE AND CONDITIONS FOR PROCESSING PERSONAL DATA**

5.1. The processing of personal data by the Operator is carried out in accordance with the requirements of the legislation of the Russian Federation in the following ways:

- non-automated processing of personal data;
- automated processing of personal data with or without the transmission of the received information via information and telecommunication networks;
- mixed processing of personal data.

5.2. The list of actions performed by the Operator with the User's personal data for the purposes provided for in cl. 2.2 of the Policy: collection, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction.

5.3. The processing of personal data is carried out by the Operator subject to obtaining the User's consent (hereinafter - Consent), obtained in accordance with the requirements of the Federal Law of July 27, 2006 N 152-FZ "On Personal Data", except for cases established by the legislation of the Russian Federation when the processing of personal data can be carried out without such Consent.

5.4. The User makes a decision on the provision of his/her personal data and gives Consent freely, by his/her own will and in his/her own interest.

5.5. The period for processing personal data is determined by the achievement of the purposes for which the personal data were collected, unless a different period is provided for by the contract with the User or by current legislation.

The condition for the termination of the processing of personal data may be the achievement of the purposes of processing personal data or the loss of the need to achieve these purposes, the expiration of the Consent or the withdrawal of the Consent by the User, as well as the identification of unlawful processing of personal data.

5.6. The consent may be withdrawn in the following way: by sending a corresponding letter in free form to the Operator's e-mail [info@airrelations.io](mailto:info@airrelations.io).

5.7. The operator carries out the dissemination of personal data permitted by the User for distribution, that is, it performs actions aimed at their disclosure to an indefinite circle of persons, in compliance with the requirements, prohibitions and conditions established by Art. 9, Art. 10.1 of the Federal Law of 27.07.2006 N 152-FZ "On personal data". The disclosure of personal data to third parties and the dissemination of personal data without the User's consent are not permitted, unless otherwise provided by federal law. The consent to the processing of personal data permitted by the User for dissemination is formalized separately from other consents of the User to the processing of his personal data, taking into account the Requirements for the content of the consent to the processing of personal data permitted by the subject of personal data for dissemination, approved by the Order of Roskomnadzor of 24.02.2021 N 18.

5.8. The Operator, when processing personal data, takes or ensures the taking of the necessary legal, organizational and technical measures to protect personal data from unauthorized or

accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unlawful actions in relation to personal data.

5.9. The storage of personal data is carried out in a form that allows to identify the User, for a period not longer than required by the purposes of processing personal data, except for cases where the period of storage of personal data is established by federal law, a contract to which the User is a party, a beneficiary or a guarantor.

5.10. When processing personal data, the Operator complies with the requirements of Art. 18 of the Federal Law of 27.07.2006 N 152-FZ "On Personal Data".

5.11. The Operator, when processing personal data, undertakes to maintain the confidentiality of personal data.

5.12. Cross-border transfer of personal data by the Operator is not carried out.

5.13. In the event of an unlawful or accidental transfer (provision, dissemination, access) of personal data, the Operator shall inform the User thereof within 5 (five) working days.

5.14. The Operator, together with the User, shall take all necessary measures to prevent losses or other negative consequences caused by the unlawful or accidental transfer (provision, dissemination, access) of the User's personal data.

## **6. BLOCKING, CLARIFICATION AND DESTRUCTION OF PERSONAL DATA. ANSWERS TO USERS' REQUESTS FOR ACCESS TO PERSONAL DATA**

6.1. In case of detection of unlawful processing of personal data upon the request of the User (his representative) or upon the request of the User (his representative) or the authorized body for the protection of the rights of subjects of personal data, the Operator shall block the unlawfully processed personal data related to the respective User, or ensure their blocking from the moment of such request or receipt of the specified request for the period of verification.

In case of detection of inaccurate personal data upon the request of the User or his representative or upon their request or upon the request of the authorized body for the protection of the rights of subjects of personal data, the Operator shall block the personal data related to this User, or ensure their blocking from the moment of such request or receipt of the specified request for the period of verification, if the blocking of personal data does not violate the rights and legitimate interests of the User or third parties.

6.2. In case of confirmation of the fact of inaccuracy of personal data, the Operator, on the basis of the information provided by the User (his representative) or the authorized body for the protection of the rights of subjects of personal data, or other necessary documents, clarifies the personal data or ensures their clarification within seven working days from the date of submission of such information.

6.3. In case of detection of unlawful processing of personal data, the Operator, within a period not exceeding three working days from the date of this detection, shall stop the unlawful processing of personal data or ensure the termination of the unlawful processing of personal data, and in case it is impossible to ensure the lawfulness of the processing of personal data, within a period not exceeding ten working days from the date of detection of the unlawful processing of personal data, shall destroy such personal data or ensure their destruction.

6.4. In case of achievement of the purpose of processing personal data, the Operator shall destroy the personal data or ensure their destruction within a period not exceeding thirty days from the date of achievement of the purpose of processing personal data, unless otherwise provided by the agreement to which the User is a party, beneficiary or guarantor, another agreement between the Operator and the User, or if the Operator is not entitled to process personal data without the User's consent on the grounds provided for by the Federal Law of 27.07.2006 N 152-FZ "On Personal Data" or other federal laws.

6.5. In case of withdrawal by the User of his consent to the processing of his personal data and if the storage of personal data is no longer required for the purposes of processing personal data, the Operator shall destroy the personal data or ensure their destruction within a period not exceeding thirty days from the date of receipt of the said withdrawal, unless otherwise provided by the agreement to which the User is a party, beneficiary or guarantor, another agreement between the Operator and the User, or if the Operator is not entitled to process personal data without the User's consent on the grounds provided for by the Federal Law of 27.07.2006 N 152-FZ "On Personal Data" or other federal laws.

6.6. Within a period not exceeding seven working days from the date of submission by the User (his representative) of information confirming that such personal data were illegally obtained or are not necessary for the stated purpose of processing, the Operator shall destroy such personal data.

6.7. Processed personal data shall be destroyed in the event of loss of the need to achieve the purposes of processing, unless otherwise provided by federal law.

6.8. The Operator responds to requests and appeals of the User (his representative) regarding the processing of his personal data in the following order: by sending a corresponding request or appeal to the Operator's e-mail [info@airelations.io](mailto:info@airelations.io).

## **7. LIABILITY OF THE PARTIES**

7.1. The Operator is liable for violation of the requirements of the Federal Law of 27.07.2006 N 152-FZ "On Personal Data" in accordance with the legislation of the Russian Federation.

7.2. The user has the right to demand compensation for damages and (or) compensation for moral damage in court.

Moral damage caused to the User as a result of a violation of his rights, a violation of the rules for processing personal data, as well as the requirements for the protection of personal data established in accordance with the Federal Law of 27.07.2006 N 152-FZ "On Personal Data", as well as the provisions of the Policy, is subject to compensation in accordance with the legislation of the Russian Federation. Compensation for moral damage is carried out regardless of compensation for property damage and losses incurred by the User.

## **8. DISPUTE RESOLUTION**

8.1. In the event of disputes and/or disagreements arising from the relationship between the User and the Operator, such issues shall be resolved in accordance with the current legislation of the Russian Federation.

8.2. The current legislation of the Russian Federation applies to the Policy and the relationship between the User and the Operator.

## **9. FINAL PROVISIONS**

9.1. The Operator has the right to make changes to the Policy without the User's consent.

9.2. The new version of the Policy comes into force from the moment it is posted on the Site, unless otherwise provided by the new version of the Policy.

The new version of the Policy applies to relations that have arisen after its entry into force.

9.3. All suggestions or questions regarding the Policy should be sent to the Operator's e-mail: [accountant@smart-consulting.agency](mailto:accountant@smart-consulting.agency), [info@airelations.io](mailto:info@airelations.io).