

# Privacy Policy

## Policy on Storage, Protection, and Processing of Personal Data

### 1. Terms and Accepted Abbreviations

- 1.1. User – the subject of personal data, including those who use the Site in any form or have accessed it.
- 1.2. Personal data (PD) means:
- 1.2.1. Personal data provided by the User independently during registration (creating an account/filling out forms) or during the use of Site services, including data automatically transmitted to the Site services when using software installed on the User's device, including personal data of the User, such as, but not limited to:
- surname, first name, middle name;
  - email address;
  - contact phone number;
  - country and city of residence;
  - information about the User's usage of the Site, including the date of access to the Site, time, and method of use, data flow, and screen elements clicked by the User during the use of the Site (history of visits), referrer (address of the previous page);
  - technical information about the hardware, software, and operating systems used while visiting the Site, User's IP address;
  - cookie data;
  - information about the browser (or other program used to access Site services);
  - addresses of requested pages of the Site and other similar information.
- 1.2.2. Any other information related directly or indirectly to a specific or identifiable individual (User), the processing of which is provided in the Policy.
- 1.3. Personal data operator (Operator) – the organization that independently or jointly with other persons organizes the processing of personal data and defines the purposes of personal data processing, actions (operations) performed with personal data. The Operator is individual entrepreneur Shiryaykin S.L.
- 1.4. Processing of personal data – any action (operation) or set of actions (operations) with personal data, carried out with or without the use of automation tools, including with the use of internet services such as Google Analytics, Yandex.Metrica, LiveInternet, Rating Mail.ru, Google Doubleclick. Personal data processing includes, but is not limited to:
- collection;
  - recording;
  - systematization;
  - accumulation;
  - storage, including for the periods set by regulatory documents, but not less than three years from the date of the User ceasing to use the Site;
  - updating (amending);
  - extraction;
  - use;
  - transfer (dissemination, provision, access, transfer by court order, including to third parties, with measures to protect personal data from unauthorized access);
  - anonymization;
  - blocking;
  - deletion;
  - destruction.
- 1.5. Automated processing of personal data – processing of personal data using computing technology.
- 1.6. Dissemination of personal data – actions aimed at disclosing personal data to an indefinite number of persons.
- 1.7. Provision of personal data – actions aimed at disclosing personal data to a specific person or specific group of persons.
- 1.8. Blocking of personal data – temporary cessation of personal data processing (except when processing is necessary to clarify personal data).
- 1.9. Destruction of personal data – actions that make it impossible to restore the content of personal data in the personal data information system and/or the destruction of material carriers of personal data.
- 1.10. Anonymization of personal data – actions that make it impossible to identify the personal data subject without using additional information.
- 1.11. Information system of personal data (ISPD) – a set of personal data stored in databases and the information technologies and technical means used for their processing.
- 1.12. Personal data made publicly available by the User – PD that has been made available to an unlimited number of persons by the User or at their request.
- 1.13. Site – a set of software and hardware means for an electronic computing machine (ECM), ensuring the publication for general viewing of information and data, unified by a common purpose, through technical means used for communication between ECMs on the Internet. The Site is located at: onerobot.pro
- 1.14. Policy – the Policy on the storage, protection, and processing of personal data described in this document.

### 2. General Provisions

- 2.1. This Policy is created in accordance with paragraph 2 of Article 18.1 of the Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006, and other regulatory legal acts of the Russian Federation in the field of protection and processing of personal data, and applies to all Personal Data that the Operator may receive from the User for the purposes specified in this Policy.
- 2.2. The use of the Site's services means that:
- The User agrees to provide the Operator with their personal data for use in the purposes specified in the Policy.
  - The User unconditionally agrees to the Policy and the conditions for processing their personal data specified therein.
  - The User acts freely, voluntarily, and in their own interest.
  - The personal data provided by the User to the Operator belong to the User personally.
  - The User has carefully and fully reviewed the Policy and the conditions for processing personal data contained therein.
- If the User disagrees with these conditions, they must refrain from using the services of the Site.
- 2.3. The Policy sets mandatory general requirements and rules for the Operator's employees involved in servicing the Site concerning all types of information carriers containing User's personal data.
- 2.4. The Policy does not address issues related to the security of personal data classified as state secrets of the Russian Federation according to the established procedure.
- 2.5. The objectives of the Policy are:
- Ensuring the protection of human rights and freedoms in the processing of personal data, including the right to privacy, personal and family secrets;
  - Preventing unauthorized actions by the Operator's employees and any third parties in collecting, systematizing, accumulating, storing, clarifying (updating, changing) personal data, and other forms of illegal interference in the Operator's information resources and local computing network, ensuring the legal and regulatory confidentiality of undocumented information of Site Users;
  - Protecting the constitutional rights of citizens to personal secrecy, confidentiality of information constituting personal data, and preventing potential threats to the security of Site Users.
- 2.6. Personal data processing is carried out in accordance with the principles and rules specified by the Policy and the laws of the Russian Federation.
- 2.7. Sources of User's personal data:
- 2.7.1. The source of information about all User's personal data is the User themselves.
- 2.7.2. The source of information about the User's personal data includes information obtained as a result of the Operator providing the User with the right to use the Site.
- 2.8. The legal basis for processing personal data is a set of legal acts under which and in accordance with which the Operator processes personal data, including but not limited to:
- Federal laws and regulatory legal acts adopted on their basis, governing relations related to the Operator's activities;
  - Local regulatory acts of the Operator;
  - Contracts entered into between the Operator and the User;
  - Consent to process personal data (in cases not directly provided for by the laws of the Russian Federation but corresponding to the Operator's powers).
- 2.9. The User has the right to access their personal data in the manner defined by Article 14 of the Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006.

### 3. Creation, Processing of Personal Data, and the Goals Pursued

- 3.1. Documents containing personal data (PD) are created by:
- Entering information into registration forms, including those posted on the Site;
  - Copying original documents;
  - Obtaining originals of necessary documents.
- 3.2. Personal data processing is carried out:
- With the User's consent to process their personal data;
  - In cases where personal data processing is necessary to carry out and fulfill the functions, powers, and duties imposed by the legislation of the Russian Federation;
  - In cases where personal data is processed, access to which is granted to an unlimited circle of persons by the User or upon their request.
- 3.3. The purpose of processing personal data is:
- Conclusion of contracts with the User regarding real estate objects, including but not limited to participation in shared construction, lease agreements, reservation agreements, paid services agreements, and property ownership registration for real estate objects;
  - Ensuring compliance with the requirements of Russian Federation legislation;
  - And for any other purposes directly or indirectly related to the sale, rental, or ownership, use, and disposal of real estate in any other manner.
- To achieve these goals, personal data processing may involve:
- Creation of personal data information systems by the Operator;
  - Sending the User information about products and services of the Operator and/or its counterparts;
  - Increasing the User's awareness of the products and services of the Operator, information about which is posted on the Site, as well as providing relevant advertising information and optimizing advertising.
- 3.4. Access to personal data of Users is granted to individuals authorized in accordance with their official duties. A list of persons with access to personal data is approved by the Operator's General Director.
- 3.5. Personal Data Storage.
- 3.5.1. Personal data may be obtained, further processed, and transferred for storage both in paper and electronic form.
- 3.5.2. Personal data stored on paper carriers are kept in locked cabinets or rooms with restricted access.
- 3.5.3. Personal data of the User processed with the use of automation means for various purposes are stored in different folders.
- 3.5.4. Storing and placing documents containing personal data in open electronic directories (file-sharing systems) in the ISDPD is prohibited.
- 3.5.5. Personal data in a form that allows the identification of the User is stored no longer than necessary for the purposes of their processing and must be destroyed upon achieving the processing goals or in the event that there is no longer a need for them.
- 3.5.6. The retention periods for User's personal data on the Site are determined by the terms of the Policy, calculated from the moment the User accesses the Site, and remain in effect until the User requests the deletion of their personal data from the Site.
- 3.6. Destruction of Personal Data.
- 3.6.1. Destruction of documents (carriers) containing personal data is carried out by burning, crushing (grinding), chemical decomposition, or transforming into an amorphous mass or powder. A shredder may be used for destroying paper documents.
- 3.6.2. Personal data on electronic media is destroyed by erasing or formatting the storage device.
- 3.6.3. The fact of the destruction of the personal data carrier is confirmed by an act.
- 3.6.4. The User has the right to request in writing the destruction of their personal data if the personal data is incomplete, outdated, inaccurate, illegally obtained, or unnecessary for the declared purpose of processing.
- 3.6.5. In the case where it is impossible to destroy the personal data, the Operator will block such personal data.
- 3.7. The Operator transfers personal data to third parties in the following cases:
- 3.7.1. The User has expressed consent to such actions.
- 3.7.2. The transfer is required by Russian or other applicable legislation within the established legal procedure.
- 3.7.3. The transfer of personal data is carried out at the request of a court, including to third parties.
- 3.8. The processing of personal data may cease upon achieving the purposes of processing personal data, expiration of the consent period, or withdrawal of the User's consent to process their personal data, as well as upon identification of unlawful processing of personal data.
- 3.9. Upon achieving the purposes of processing personal data, as well as in the case of withdrawal of the User's consent to their processing, personal data should be destroyed, except in cases where personal data is necessary for the Operator to fulfill obligations imposed by the agreement with the User.

### 4. List of personal data of the user processed by the operator

- 4.1. In accordance with this Policy, the User has provided the Operator with consent to process the following personal data:
- Last name, first name, middle name.
  - Gender.
  - Date and place of birth.
  - Passport data.
  - Registration addresses at the place of residence and actual residence.
  - Phone numbers: home and mobile.
  - Personal email addresses.
  - Contact information.
  - Information about tax registration (TIN).
  - Information about the insurance number of the individual personal account (SNILS).
  - Information about marital status, children (last name, first name, patronymic, date of birth), family composition.
  - Source of entry to the Website and information from search or advertising queries.
  - Data about the user's device (including resolution, version, and other attributes characterizing the user's device).
  - User clicks, page views, form fillings, banner and video views.
  - Data characterizing audience segments.
  - Session parameters.
  - Data about the time of visiting the Website.
  - User identifier and other files stored in cookies.
  - Other personal data that has been or may be provided by the User for the purposes outlined in the Policy.
- 4.2. The User agrees to the possible use of cookies by the Website/Operator, including for the following purposes:
- To provide the User with personalized services, improve target advertising displayed to the User, conduct statistical and research purposes, and improve service quality;
  - To send advertising or marketing messages, based on, among other things, the User's location and/or preferences while visiting the Website;
  - To move the User through the Website (between pages), save User settings, and generally improve the User experience, making interaction with the Website faster and easier.
- 4.3. The User acknowledges that the equipment and software used to visit websites on the Internet may have a function that blocks cookie operations (for all websites or for specific ones) as well as deletes previously received cookies. The User has the ability to configure their browser to notify them every time a cookie is sent or to reject all cookies. It is also possible to delete existing cookies.
- 4.4. The acceptance of certain personalized services on the Website is only possible if the User has allowed the acceptance of cookies. If cookies are deleted or acceptance is prohibited, some areas or features of the Website may be unavailable for the User.
- 4.5. The User agrees to the processing of personal data by the Operator for the purposes outlined in the Policy, including those containing the User's cookies data (e.g., the User's name, method of arriving at the Website, or approximate location of the User).
- 4.6. The structure, content, and technical parameters of the cookie file are defined by the Operator and may change without prior notification to the User.
- 4.7. Counters placed on the Website may be used to analyze User cookies, collect and process statistical information about the use of the Website, and ensure the Website's functionality in general or for its individual features.

### 6. Providing personal data to third parties

- 6.1. The User agrees to the Operator providing the User's personal data to another party with whom the Operator collaborates under a contract, provided that such party complies with the principles and rules of processing personal data, the requirements for their protection as outlined in the Federal Law of July 27, 2006, No. 152-FZ "On Personal Data," as well as ensuring the confidentiality and security of personal data during processing.
- 6.2. The list of personal data, the purposes for their processing, and the actions performed with them by the party authorized by the Operator are determined by the Policy.
- 6.3. In order to fulfill its obligations under the agreements concluded with the User, the Operator may provide the User's personal data to its employees, contractors, credit institutions, and authorized controlling bodies.
- 6.4. The Operator has the right to transfer the User's personal data to law enforcement agencies, investigation bodies, and other authorized bodies for the reasons specified by the current legislation of the Russian Federation.
7. Considering User requests on personal data processing
- 7.1. All proposals or questions related to the Policy, as well as User requests on personal data processing, should be sent to the Operator as an official written inquiry to the Operator's address indicated in the Policy.
- 7.2. Upon receiving the User's written inquiry, the Operator, if there are grounds, is obliged to provide information in the volume established by federal law within 30 business days from the date of receiving the User's inquiry. Such information should be provided to the User in an accessible form, and it should not contain personal data relating to other users unless there are legal grounds for disclosing such personal data.
- 7.3. All inquiries from Users are registered in the Personal Data Subject Inquiry Log for processing personal data inquiries.
- 7.4. In the event of refusal to provide the User with information on the existence of personal data subjects about the respective User, the Operator must provide a written reasoned response within 30 business days from the date of receiving the User's inquiry.
- 7.5. In the event of a request from the authorized body for the protection of personal data subjects' rights for the provision of information necessary for the operation of such a body, the Operator is obliged to provide such information to the authorized body within 30 business days from the date of receiving such a request.
- 7.6. In case of detection of unlawful processing of personal data upon a User's inquiry or from the authorized body for the protection of personal data subjects' rights, the Operator is obliged to block the unlawfully processed personal data of that User from the moment of the inquiry until the verification period.
- 7.7. In case of detection of unlawful personal data processing by the Operator, the Operator must terminate such processing within three business days from the date of detection.

### 8. Confidentiality regime for personal data

- 8.1. Personal data of Users is considered confidential information with limited access.
- 8.2. Confidentiality of personal data is not required in cases of anonymization or for publicly available personal data.
- 8.3. The Operator ensures the protection of processed personal data from unauthorized access and disclosure, unlawful use, or loss in accordance with the requirements of Federal Law No. 152-FZ "On Personal Data" of July 27, 2006.
- 8.4. The Operator ensures the confidentiality and security of personal data during their processing in accordance with the requirements of Russian Federation legislation.
- 8.5. In accordance with the list of personal data processed on the Website, the personal data of Users is confidential information.
- 8.6. Persons engaged in the processing of personal data must comply with the requirements of the Operator's regulatory documents regarding the confidentiality and security of personal data.

### 9. Protection of Personal Data

- 9.1. In accordance with the requirements of regulatory documents, the Operator may establish a personal data protection system (PDPS) for the purpose of processing personal data, which consists of legal, organizational, and technical protection subsystems.
- 9.2. The legal protection subsystem consists of a set of legal, organizational, and regulatory documents that ensure the creation, functioning, and improvement of the PDPS.
- 9.3. The organizational protection subsystem includes the organization of the PDPS management structure, the authorization system, and the protection of information when working with employees, partners, and third parties.
- 9.4. The technical protection subsystem includes a set of technical, software, and hardware means ensuring the protection of personal data.
- 9.5. The main protection measures for personal data used by the Operator are:
- 9.5.1. Organization of personal data processing, internal control to ensure compliance with data protection requirements.
- 9.5.2. Identification of current threats to the security of personal data during their processing and the development of measures and actions for personal data protection.
- 9.5.3. Development and updating of policies for the storage, protection, and processing of personal data.
- 9.5.4. Establishment of rules for access to personal data and its processing.
- 9.5.5. Establishment of individual access passwords for employees to the information system in accordance with their job responsibilities.
- 9.5.6. Application of information protection tools that have undergone the established procedure for compliance evaluation.
- 9.5.7. Certified antivirus software with regularly updated databases.
- 9.5.8. Compliance with conditions ensuring the integrity of personal data and preventing unauthorized access.
- 9.5.9. Detection of unauthorized access to personal data and taking appropriate action.
- 9.5.10. Restoration of personal data modified or destroyed as a result of unauthorized access.
- 9.5.11. Training of employees directly processing personal data on the provisions of the Russian Federation legislation on personal data, including the requirements for personal data protection, documents defining the Operator's policy regarding storage, protection, and processing of personal data, and local acts on personal data processing.
- 9.5.12. Conducting internal control and audits.

### 10. Personal Data Protection System

- 10.1. Measures to ensure the security of personal data during their processing.
- 10.1.1. The Operator must take necessary legal, organizational, and technical measures or ensure their implementation to protect personal data from unlawful or accidental access, destruction, alteration, blocking, copying, provision, distribution, or other unlawful actions related to personal data.
- 10.1.2. Ensuring the security of personal data is achieved, in particular, through:
- Identifying threats to the security of personal data during their processing in personal data information systems.
  - Implementing 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.
  - Using information protection tools that have passed the established procedure for compliance evaluation.
  - Evaluating the effectiveness of security measures before the launch of personal data information systems.
  - Accounting for machine carriers of personal data.
  - Detecting unauthorized access to personal data and taking measures.
  - Restoring personal data modified or destroyed due to unauthorized access.
  - Establishing access rules for personal data processed in information systems.
  - Monitoring the implementation of measures ensuring the security of personal data and the level of protection of information systems.
- 10.1.3. Security threats to personal data refer to the set of conditions and factors creating a risk of unauthorized, including accidental, access to personal data, which may result in destruction, alteration, blocking, copying, provision, distribution, or other unlawful actions during their processing in personal data information systems. The level of protection of personal data refers to the comprehensive indicator that characterizes the requirements whose fulfillment ensures the neutralization of specific threats to the security of personal data during their processing in personal data information systems.
- 10.2. Requirements for the personal data protection system.
- 10.2.1. The personal data protection system must comply with the requirements of the Government of the Russian Federation Resolution No. 1119 dated 01.11.2012 "On approval of the requirements for the protection of personal data during their processing in personal data information systems."
- 10.2.2. The personal data protection system must ensure:
- Timely detection and prevention of unauthorized access to personal data and/or its transfer to persons who do not have the right to access such information.
  - Prevention of impact on technical means of automated processing of personal data that could disrupt their functioning.
  - The ability to immediately restore personal data modified or destroyed due to unauthorized access.
  - Continuous control over the level of protection of personal data.
- 10.2.3. The information protection tools used in information systems must undergo the compliance evaluation procedure in the prescribed manner.
- 10.3. Methods and ways to protect information in personal data information systems.
- 10.3.1. The main methods and ways of protecting information in personal data information systems for Users are methods and ways to protect information from unauthorized, including accidental, access to personal data, which may result in destruction, alteration, blocking, copying, distribution of personal data, and other unlawful actions.
- 10.3.2. The selection and implementation of information protection methods on the Website are carried out according to recommendations from information protection regulators, based on the security threats determined by the Operator (threat models), and depending on the class of the information system.
- 10.3.3. The selected and implemented methods of protecting information on the Website must ensure the neutralization of anticipated security threats to personal data during their processing.
- 10.3.4. Protection measures for personal data may include:
- Defining the list of information that constitutes personal data.
  - Limiting access to information containing personal data by establishing procedures for handling this information and monitoring compliance with such procedures.

### 11. User's Rights and Operator's Obligations

- 11.1. The User has the right:
- To access their personal data in accordance with the legislation of the Russian Federation.
  - To withdraw consent to the processing of personal data.
  - To take other actions as provided by the legislation of the Russian Federation.
- 11.2. The Operator is obligated to:
- Process personal data.
  - Explain the consequences of refusal to provide personal data to the Operator.
  - Publish or otherwise ensure unrestricted access to the document defining the Operator's policy on the storage, protection, and processing of personal data.
  - Take necessary legal, organizational, and technical measures or ensure their implementation to protect personal data from unlawful or accidental access, destruction, alteration, blocking, copying, provision, distribution, and other unlawful actions.
  - Respond to requests and inquiries from the User and authorized bodies for the protection of personal data rights.

### 12. Final Provisions

- 12.1. In case of changes in the current legislation of the Russian Federation or amendments to the regulatory documents on personal data protection, this Policy will remain valid in the part not contradicting the current legislation until it is brought into conformity.
- 12.2. If the goal of processing personal data is achieved, the Operator must stop processing personal data and destroy the data within 30 business days from the date the goal is reached, unless otherwise specified in the contract to which the User is a party.
- 12.3. This Policy enters into force with respect to the User from the moment they visit the Website and is valid indefinitely. The Policy does not require bilateral signing and is valid in electronic form.
- 12.4. If the User withdraws consent to the processing of personal data, such processing must cease by the Operator and/or third parties, and the data must be destroyed, provided it is possible to terminate/perform contracts between the User and the Operator. If such contracts are not terminated/fulfilled early, the Operator may process the User's personal data to the extent necessary for performing contractual obligations.
- 12.5. The withdrawal of consent to process personal data can be done by the User by sending a written request in simple form to the Operator's address.
- 12.6. The Operator is not liable for the use (whether lawful or unlawful) of information posted by the User on the Website, including reproduction and distribution by all possible means.
- 12.7. The Operator has the right to amend this Policy without the consent and without notifying the User. When changes are made, the date of the last revision is specified in the title of the Policy. The new version of the Policy comes into force from the moment it is posted on the Website, unless otherwise specified in the new version. The current version of the Policy is always available on the page at: onerobot.pro. Considering that informational newsletters may be considered spam, the User agrees to review the content of the Policy posted on the Website at least once a month in order to stay informed of any changes.
- 12.8. The Policy and the relations between the User and the Operator arising in connection with the application of the Policy are subject to the substantive and procedural law of the Russian Federation.
- 12.9. The Website does not control and is not responsible for third-party websites to which the User may navigate through links available on the Website.