

CONFIDENTIALITY POLICY

This Confidentiality Policy (hereinafter the “Policy”) has been developed in accordance with the requirements of Federal Law No. 152-FZ “On Personal Data” dated 27.07.2006. The Policy determines the procedure for processing by the Operator of personal data of visitors to the website <https://aij.ru> and its individual sections/pages (hereinafter the “Website”), and measures to ensure the security of personal data at Sberbank (INN: 7707083893, 117312, Russian Federation, Moscow, Vavilova St., 19) (hereinafter the “Operator”) in order to protect human and civil rights and freedoms when processing their personal data on the Website. Personal data processing at Sberbank is regulated by [the Personal Data Processing Policy](#). This Policy applies exclusively to the processing of personal data carried out in connection with the use of the Website.

1. Terms.

1.1. The following terms are used in this Policy with the meanings defined below:

1.1.1. **Operator** means a state body, municipal body, legal or natural person organizing and (or) performing Personal Data processing, independently or together with other entities, as well as determining the purposes of Personal Data processing, the composition of Personal Data to be processed, actions (operations) performed with Personal Data. For the purposes of Personal Data processing described herein, the Operator is Sberbank;

1.1.2. **Personal Data** means any information directly or indirectly related to an identified or identifiable natural person (Personal Data Subject);

1.1.3. **Website Visitor** (Visitor) means a person who has accessed the Website.

1.1.4. **Personal Data Subject** (Data Subject) means an individual whose data is processed by the Operator. For the purposes of Personal Data processing described herein, the Personal Data Subjects are the Website Visitors.

1.1.5. **Website** means a collection of web pages, sections and subsections available on the Internet at a unique address (URL): <https://aij.ru>.

Any other terms and definitions used in this Policy that are not mentioned in this section will be interpreted systematically in connection with other terms, individual conditions, and according to the meaning arising from the text of the Policy. If the meaning of a term or a concept cannot be derived from the text of the Policy, it shall be interpreted in accordance with applicable legislation or based on the established law enforcement practice.

2. Processed Personal Data.

2.1. The list of Personal Data processed in connection with the use of the Website may contain the following data:

Composition of the Personal Data	Personal Data processing purposes	Data Subject Category	Categories of Personal Data
Data contained in Cookies; information about the equipment (device) of a Visitor to the Website; session date and time; information about Visitor's actions.	Provision of the functionality of the Website, ensuring the correct Website operation, determining preferences for Website operation and subsequent improvement of the Website functionality.	Website Visitors	General personal data (special categories of personal data, as well as biometric personal data are not processed)

2.2. See Appendix 1 to this Policy for more details on the use of cookies, as well as for Internet services organizing statistical data collection on the Website.

3. Procedure and conditions for Personal Data processing.

3.1. The Operator may process Personal Data for the above mentioned purposes, with or without automated tools, by performing the following operations: collection, recording, organization and structuring, accumulation, storage, clarification (updating, alteration), retrieval, use, depersonalization, blocking, erasure, destruction, transfer (provision, access) on the terms specified in the Policy.

3.2. Storage and other processing of Personal Data is carried out for as long as it is necessary to achieve the above purposes. Personal Data processing may be carried out after the achievement of the purposes of processing in cases provided for by the current legislation.

3.3. Destruction of Personal Data in electronic form is carried out by software or hardware that excludes the recovery of destroyed data, including residual information, within the time frame and in the cases provided for by the applicable law, in particular, when the purposes of processing are achieved, as well as in the absence of legal grounds for further processing.

3.4. Personal Data is processed on servers and using databases located in the Russian Federation.

4. Legal basis for Personal Data processing.

4.1. The processing of Personal Data shall be performed only if there is a legal basis for such processing, in particular where:

- the Data Subject has given consent to the processing of his/her Personal Data for one or more purposes;
- their processing is necessary to enable the Operator to exercise its rights and legitimate interests or to promote the exercise

of rights and legitimate interests of third parties (including for the achievement of publicly significant purposes), provided that the rights and freedoms of the Data Subject are not violated;

- their processing by the Operator is required by applicable law;
- other legal basis provided for by the current legislation.

4.2. Personal Data is provided by the Operator to state and local authorities, courts, law enforcement agencies, and other authorized bodies in cases and in the manner provided for by the current legislation. The operator provides the information to public authorities only after making sure that the request is legitimate and justified. The operator shall provide the public authorities with the minimum amount of information that is expressly required by law.

5. Rights and Obligations of the Data Subject and the Operator.

5.1. The Data Subject has the right, subject to the applicable law:

5.1.1. When using the Website, to give, of his/her own free will and in his/her own interests, his/her consent to the processing of Personal Data, as well as withdraw this consent at any time by sending a request for its withdrawal.

5.1.2. To request confirmation of his/her Personal Data processing. In case of such processing, the Data Subject has the right to familiarize himself/herself with the Personal Data being processed, as well as information about the legal basis and purposes of processing, the processing methods applied, the categories of data processed, the operations with the data, the recipients of the data and the safeguards provided when the data is transferred to third parties, the existence of an actual or intended cross-border transfer, processing periods, sources of data, the existence of exclusively automated decision-making process, the inclusion of the Data Subject in the Operator's mailing list, the procedure for exercising the Data Subject's rights, ways of performing the Operator's legal obligations, as well as to familiarize himself/herself with other necessary information. The Data Subject also has the right to receive the list of Personal Data being processed.

5.1.3. To demand that Personal Data be clarified, blocked or destroyed in case Personal Data are incomplete, outdated, inaccurate. Taking into account the purposes of processing, the Data Subject has the right to amend Personal Data, including by submitting an additional application.

5.1.4. To initiate restriction of processing of his/her Personal Data if one of the following conditions is met:

- the accuracy of Personal Data is being contested by the Data Subject (restriction for the period necessary for the Operator to confirm the correctness of Personal Data);
- unlawful Personal Data processing has been revealed, the Data Subject opposes deleting his/her Personal Data and instead demands to restrict their use;
- other conditions provided for by the current legislation.

5.1.5. To demand destruction of his Personal Data if one of the following conditions is met:

- Personal Data is no longer required for the purposes for which they were obtained;
- the Data Subject withdraws his/her consent on the basis of which the processing has been carried out, or requires to stop such processing if there are no other legal grounds for processing;
- Personal data is processed unlawfully;
- Personal data shall be destroyed in order to comply with a legal obligation in accordance with legislative requirements.

5.1.6. To demand to stop processing Personal Data.

5.1.7. To file a complaint with the supervisory authority responsible for protection of the rights of Personal Data Subjects, apply to court and take other legally provided measures to protect his rights if the Operator in any way violates the Data Subject's rights in the area of Personal Data processing.

5.1.8. To exercise other rights provided for by the applicable laws.

5.2. The Operator shall:

5.2.1. Use the received Personal Data solely for the purposes specified in clause 2 of the Policy.

5.2.2. Process Personal Data, and ensure confidentiality and protection of the processed Personal Data in compliance with Federal Law of the Russian Federation No. 152-FZ "On Personal Data" dated 27.07.2006. When processing Personal Data, take necessary legal, organizational and technical measures to protect the received Personal Data from unauthorized or accidental access to them, destruction, modification, blocking, copying, transferring, distribution of Personal Data, as well as from other illegal actions in relation to the received Personal Data. When processing Personal Data, provide access to Personal Data only to those employees who actually need it to perform their job duties.

5.2.3. Ensure the storage of Personal Data in secret, not disclose it without the Data Subject's consent, as well as not sell, exchange, publish or otherwise making it public, except in cases provided for by the Policy and current legislation.

6. Additional Terms and Conditions.

6.1. The Operator may amend this Policy. The Operator recommends reviewing the Policy regularly.

6.2. The Policy shall come into force from the moment of its publication on the Website, unless otherwise provided for by the new version of the Policy.

6.3. To exercise your rights and for any issues related to the processing of your Personal Data, you can send a request:

6.3.1. by mail to: 19 Vavilova St., Moscow, 117997, Russian Federation

6.3.2. to the e-mail address: info@ajj.ru

Cookies Usage Policy

The Cookies Usage Policy is an integral part of the Policy and shall apply in addition to it. This policy describes the types of Cookies processed by the Website, as well as the procedure and purposes of their processing.

1.1. Cookie is a small piece of data that the Website requests from the browser used on your computer or mobile device. Cookies reflect your preferences or actions on the website. Cookies are stored locally on your computer or mobile device. Instructions for managing Cookies files in the browser can usually be found through the help service (Help function, if available) or in the browser settings.

1.2. The Operator shall use Cookies for the purposes of providing the functionality of the Website, ensuring the Website correct operation, determining the preferences in the Website operation and subsequent improvement of its functionality.

1.3. The Operator uses the following Cookies types:

Name of Cookie	Purpose	Type	Storage period
_ym_metrika_enabled	Checks whether other Metrika cookies are correctly installed	Persistent	60 minutes
_ym_isad	Used to determine if a visitor has ad blockers	Persistent	2 days
_ym_uid	Allows to distinguish visitors	Persistent	1 year
_ym_d	Stores the date of the first visitor's visit to the website	Persistent	1 year
yabs-sid	Visit identifier	Session	During the visit
_ym_debug	Indicator of enabled debug mode	Session	During the visit
_ym_visorc_*	Used for correct operation of Webvisor	Persistent	30 minutes
_ym_hostIndex	Allows limiting the number of requests	Persistent	1 day
i	Allows to distinguish visitors	Persistent	1 year
ymex	Stores auxiliary information for Metrika operation: time of creation of identifiers and their alternative values.	Persistent	1 year
usst	Stores auxiliary information to synchronize visitor identifiers between different Yandex domains	Persistent	1 year
X-Session-ID	Stores visitor session ID	Persistent	24 hours

1.4. The website processes Cookies including using metric programs that store and process data in accordance with their own requirements and regulatory documents. The list of such programs and conditions for their data processing can be found below:

1.4.1. Yandex.Metrica, (the terms of processing your data by Yandex.Metrica (provided by Yandex LLC (119021, Moscow, L.Tostoy St., 16) are available at the following link: <https://yandex.ru/support/metrika/>). You can opt out of Cookies processing by Yandex.Metrica by the means specified in Clause 1.6 hereof or using the tool: <https://yandex.ru/support/metrika/general/opt-out.html>.

1.5. The Operator processes Cookies by automated means performing the following operations: collection, receipt, recording, systematization, accumulation, storage, refinement (update, change), extraction, use, blocking, deletion, destruction, anonymization, transfer (provision, access) to Yandex.Metrica LLC (when using the metric program Yandex.Metrica).

1.6. The Data Subject has the right to manage, block Cookies or refuse their processing.

Instructions for managing Cookies in Chrome browser: <https://support.google.com/chrome/answer/95647>.

Instructions for managing cookies in Internet Explorer browser: <https://support.microsoft.com/ru->

[ru/help/17442/windows-internet-explorer-delete-manage-cookies](https://support.apple.com/ru-ru/help/17442/windows-internet-explorer-delete-manage-cookies);

Instructions for managing cookies in Safari browser: <https://support.apple.com/ru-ru/guide/safari/sfri11471/mac>;

Instructions for managing cookies in Yandex.Browser: <https://browser.yandex.ru/help/personal-data-protection/cookies.html>.

If Cookies or a part of Cookies are deleted, blocked or refused to be processed, you may not gain access to certain functions of the Website.

1.7. The storage period for Cookies on your device depends on the type of Cookies and your settings. As a general rule, Cookies are deleted from your device as soon as the purpose for which they were installed is achieved. Session Cookies are stored in your browser during your session and deleted after you close your browser.