

Policy on personal data processing

1. General Provisions

This policy of processing personal data is made in accordance with the requirements of the Federal Law dated 27.07.2006. No. 152-FZ "On Personal Data" (hereinafter - the Law on Personal Data) and defines the order of processing personal data and measures to ensure the security of personal data taken by Frost LLC (hereinafter - the Operator).

1.1. The Operator sets as its most important goal condition of its activity the observance of human and citizen's rights and freedoms in the processing of his personal data, including including protection of rights to privacy, personal and family secret.

1.2. This Operator's policy regarding the processing of personal data (hereinafter - the Policy) applies to all information that the Operator may obtain about the visitors of the website <https://frost-lada.com>.

2. Basic concepts used in the Policy

2.1. Automated processing of personal data - processing of personal data with the help of computing equipment.

2.2. Blocking of personal data - temporary cessation of personal data processing (except for cases when processing is necessary to clarify personal data).

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

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

2.5. Personal data depersonalization - actions as a result of which it is impossible to determine, without using additional information, the belonging of personal data to a particular User or other subject of personal data.

2.6. Processing of personal data - any action (operation) or set of actions (operations) performed using automation means or without using such means.

with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.7. Operator - a state authority, a municipal authority, a legal or individual person, independently or together with other persons organizing and/or carrying out the processing of personal data, as well as determining the purposes of personal data processing, the composition of personal data subject to processing, actions (operations) performed with personal .

2.8. Personal Data - any information relating directly or indirectly to a specific or identifiable User of the <https://www.frost-lada.com> website.

2.9. Personal data authorized by the subject of personal data for dissemination - personal data, access to which is provided by the subject of personal data to an unlimited number of persons by giving consent to the processing of personal data authorized by the subject of personal data for dissemination in the manner prescribed by the Law on Personal Data (hereinafter - personal data authorized for dissemination).

2.10. User - any visitor to the <https://www.frost-lada.com> website.

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

2.12. Dissemination of personal data - any actions aimed at disclosure of personal data to an indefinite number of persons (transfer of personal data) or to familiarize an unlimited number of persons with personal data, including disclosure of personal data in mass media, placement in information and telecommunication networks or providing access to personal data in any other way.

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

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

3. Main rights and obligations of the Operator

3.1. The operator shall have the right to:

- to receive from the subject of personal data reliable information and/or documents containing personal data;
- in case the personal data subject revokes his/her consent to personal data processing, as well as if he/she submits a request to stop personal data processing, the Operator has the right to continue personal data processing without the consent of the personal data subject data if there are grounds specified in the Personal Data Law;
- independently determine the composition of and the list of measures, necessary and sufficient to ensure the fulfillment of obligations stipulated by the Law on personal data and normative legal acts adopted in accordance with it, unless otherwise provided by the Law on personal data or other federal laws.

3.2. The operator is obligated to:

- provide the personal data subject, upon his/her request, with information regarding the processing of his/her personal data;
- organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;
- respond to appeals and requests of personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
- to inform the authorized body for the protection of the rights of personal data subjects, upon request of this body, of the necessary information within 10 days from the date of receipt of such request;
- publish or otherwise provide unrestricted access to this Personal Data Processing Policy;
- take legal, organizational and technical measures to protect personal data from unlawful 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;

— cease transfer (dissemination, provision, access) of personal data, stop processing and destroy personal data in the manner and cases stipulated by the Personal Data Law;

— to fulfill other obligations stipulated by the Personal Data Law.

4. Basic rights and obligations of personal data subjects

4.1. Personal data subjects have the right to:

— receive information regarding the processing of his/her personal data, except in cases provided for by federal laws. Information shall be provided to the subject of personal data by the Operator in an accessible form and shall not contain personal data relating to other subjects of personal data, except in cases where there are legal grounds for disclosure of such personal data. The list of information and the procedure for obtaining it is established by the Law on Personal Data;

— to demand from the operator to clarify his personal data, block or destroy them if the personal data are incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as to take measures provided by law to protect his rights;

— impose a condition of prior consent when processing personal data for the purpose of marketing goods, works and services;

— to withdraw consent to the processing of personal data, as well as to send a request to stop the processing of personal data;

— to appeal to the authorized body for the protection of the rights of personal data subjects or in court against unlawful acts or omissions of the Operator in the processing of his/her personal data;

— to exercise other rights provided for by the legislation of the Russian Federation.

4.2. Personal data subjects are obliged to:

— provide the Operator with true data about himself;

— to inform the Operator about the clarification (update, change) of his/her personal data.

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

5. Principles of personal data processing

5.1. The processing of personal data is carried out on a lawful and fair basis.

5.2. The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data incompatible with the purposes of personal data collection is not allowed.

5.3. It is not allowed to merge databases containing personal data processed for incompatible purposes.

5.4. Only personal data that meet the purposes for which they are processed shall be processed.

5.5. The content and scope of processed personal data correspond to the stated purposes of processing. The redundancy of processed personal data in relation to the stated purposes of their processing is not allowed.

5.6. When processing personal data, the accuracy of personal data, their sufficiency, and in necessary cases their relevance in relation to the purposes of personal data processing is ensured. The Operator takes the necessary measures and/or ensures that they are taken to delete or clarify incomplete or inaccurate data.

5.7. Personal data shall be stored in a form that allows identification of the subject of personal data for no longer than required by the purposes of personal data processing, unless the period of personal data storage is established by federal law, contract to which the subject of personal data is a party, beneficiary or guarantor. Processed personal data shall be destroyed or depersonalized upon achievement of the purposes of processing or in case of loss of necessity to achieve these purposes, unless otherwise provided for by federal law.

6. Purposes of personal data processing

Purpose of processing	provision of services, information contained on the website	access to information	User and/or materials
Personal data	— e-mail address — phone numbers — name		
Legal grounds	Federal Information protection information" of 27.07.2006 N 149-FZ	law technologies	"On Information, and
Types treatments personal data	Transfer of personal data		

7. Conditions of personal data processing

7.1. Personal data processing is carried out with the consent of the personal data subject to the processing of his/her personal data.

7.2. Processing of personal data is necessary to achieve the purposes stipulated by the international treaty of the Russian Federation or by law, to fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation.

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

7.4. The processing of personal data is necessary for the execution of a contract to which the personal data subject is a party or a beneficiary or guarantor, as well as for the conclusion of a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor.

7.5. The processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator or third parties or for the achievement of socially important purposes, provided that the rights and freedoms of the personal data subject are not violated.

7.6. Processing of personal data is carried out where access to which is granted to an unlimited number of persons by the subject of personal data or at his/her request (hereinafter - publicly available personal data).

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

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

The security of personal data processed by the Operator is ensured by implementing legal, organizational and technical measures necessary for full compliance with the requirements of the applicable legislation in the field of personal data protection.

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

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

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

8.4. The period of personal data processing is determined by the achievement of the purposes for which the personal data were collected, unless another period is not stipulated by stipulated by contract or applicable legislation. The User may revoke his/her consent to the processing of personal data at any time by sending a notice to the Operator by means of e-mail. mail to the electronic address Operator's e-mail addressmail@frost-lada.com with labeled "Withdrawal consent to processing of personal data".

8.5. All information that is collected by third-party services, payment systems, communication facilities and other service providers, is stored and processed by the specified persons (Operators) in accordance with their User Agreement and Privacy Policy. Personal Data Subject and/or with said documents. The Operator is not responsible for the actions of third parties, including the service providers specified in this paragraph.

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

8.7. When processing personal data, the Operator shall ensure confidentiality of personal data.

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

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

9. List of actions performed by the Operator with the received personal data

9.1. The Operator shall collect, record, systematize, accumulate, store, clarify (update, change), extract, use, transfer (disseminate, provide, access), depersonalize, block, delete and destroy personal data.

9.2. The Operator carries out automated processing of personal data with or without receiving and/or transmitting received information via information and telecommunication networks.

10. Cross-border transfer of personal data

10.1. The operator shall notify the authorized body for the protection of the rights of personal data subjects of its intention to carry out transborder transfer of personal data (such notification shall be sent separately from the notification on the intention to carry out personal data processing) prior to the commencement of transborder personal data transfer activities.

10.2. Prior to submitting the above-mentioned notification, the Operator is obliged to obtain relevant information from foreign authorities, foreign natural persons, foreign legal entities to whom trans-border transfer of personal data is planned.

11. Confidentiality of personal data

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

12. Final provisions

12.1. The User may obtain any clarifications on the issues of interest regarding the processing of his/her personal data by contacting the Operator via e-mail at mail@frost-lada.com.

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