

**Policy of processing of personal data**

This Policy defines the procedure, conditions for processing of personal data of users of the website <https://www.padva-epshtein.ru/> (hereinafter referred to as the Website) and establishes requirements for ensuring the security of personal data of users of the Website.

The Policy applies to all information (including personal data) that Padva & Epshtein Law Firm LLC (hereinafter referred to as the Operator) and its authorized partner organizations can receive about the User during his work with the Website, during provision of services to the User, and equally in the course of execution of any agreements and contracts with the User by the Operator.

The policy is developed and is being implemented in accordance with the following regulatory legal acts in the field of processing and ensuring the security of personal data:

• The Constitution of the Russian Federation;

• Federal Law No. 152-FZ of July 27, 2006 “On Personal Data”;

• Decree of the Government of the Russian Federation of September 15, 2008 N 687 "On Approval of the Regulations on the Specifics of Personal Data Processing without the Use of Automation Tools";

• Decree of the Government of the Russian Federation of November 01, 2012 N 1119 "On approval of requirements for the protection of personal data during their processing in information systems of personal data".

**Definitions:**

**Personal data** – any information directly or indirectly relating to an identified or identifiable person (citizen). Such information may include: full name, year, month, date and place of birth, postal address, email address, telephone number, information about marital, social, property status, information about education, profession, income, health information and other information.

**Processing of personal data** – any action with personal data performed using automation tools or without the use of such tools. Such actions may include: collection, receipt, recording, systematization, accumulation, storage, updating, modification, extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, utilization of personal data.

**The User** – an individual who gains access to the functionality of the Website.

**The Operator** – an entity or an individual, independently or jointly with other persons, organizing and (or) carrying out the personal data processing, as well as determining the purposes of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data. The operator is Padva & Epshtein Law Firm LLC. Address: 109004, Russia, Moscow, st. Zemlyanoy Val, 54, building 2.

1. The processing of personal data of users of the Website is carried out in compliance with the following principles:

• legality;

• limiting the processing of personal data to the achievement of specific, predetermined and legitimate purposes;

• preventing the processing of personal data that is incompatible with the purposes of personal data collecting;

• preventing the merging of databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other.

2. In course of processing of personal data of users, the Operator takes the necessary and sufficient legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data.

3. In course of processing of personal data of users, technical means and technological solutions are used to depersonalize the subjects of personal data when accessing the information containing personal data of persons directly involved in the personal data processing.

4. Personal data of users is stored on own servers of the Operator in full compliance with the legal and regulatory requirements established by the current legislation of the Russian Federation.

5. The Operator does not process biometric and special categories of personal data of users.

6. When changing their personal data, the User agrees that such a change occurs on the same terms as the initial provision of their personal data, does not require additional consent, and the changed personal data is processed in the same manner as the initially provided personal data.

7. The Operator guarantees and ensures the complete confidentiality of the personal data of users processed when providing access to the functionality of the Website, except as expressly provided by this Policy or the current legislation of the Russian Federation.

8. The operator processes only personal data necessary for the delivery of goods to the User, for the provision of services to the User, as well as for the proper execution of contracts concluded with users.

9. The implementation of information, news and advertising mailings to the User is carried out by the Operator only with the User’s consent to receive such mailings. The User may at any time unsubscribe from any mailings to which he has subscribed or otherwise gave his consent.

10. The operator has the right to transfer personal data of users to third parties in the following cases:

• The User has expressly agreed to such actions.

• The transfer is necessary for the performance of the contract concluded with the User.

• The transfer is provided by applicable law.

11. The User has the right at any time to demand from the Operator to stop processing his personal data.

The Operator has the right to make changes to these principles and rules. When making changes in the current version, the date of the last update is indicated. The new edition comes into force from the moment of its publication, unless otherwise provided by the new edition. The current edition is constantly available on the page at: <https://www.padva-epshtein.ru/>.