

GUSI-LEBEDI
Web Development Studio

Personal Data Processing Policy

1. General Provisions

The present personal data processing policy was designed in compliance with provisions of Federal Law No. 152-FZ Concerning Personal Data dated 27.07.2006. It establishes the order for personal data processing and measures for personal data protection, taken by LLC IVENT HAB (hereinafter referred to as the Operator).

- 1.1. The Operator considers complying with rights and freedom of a person or a citizen, while processing their personal data, to be its main goal and the term for performing its activity, including protection of private and personal life, and family secrecy.
- 1.2. The present Personal Data Processing Policy of the Operator (hereinafter – the Policy) shall be applied to all information the Operator might acquire about users of <https://gusi-lebedi.com/> website.

2. Main Terms Used in the Policy

- 2.1 Automated personal data processing is the processing of personal data, involving computer equipment;
- 2.2. Blocking of personal data shall mean temporary termination of personal data processing (excluding the cases when processing is needed for personal data specification);
- 2.3. Website is a combination of graphic and information materials along with computer software and data bases, providing their availability in the Internet at the following network address: <https://gusi-lebedi.com/>;
- 2.4. Personal Data Information System is a combination of personal data, included into data bases, with information technologies and hardware, allowing data processing;
- 2.5. Personal Data Anonymisation are actions resulting into impossibility to determine a specific personal data owner or subject without use of additional information;
- 2.6. Personal Data Processing is any action (operation) or a set of actions (operations), involving personal data, taken along the application of automation means or without such, including collection, record, systematisation, accumulation, storage, specification (update, alteration), extraction, application, transfer (distribution, provision, access), anonymisation, blockage, removal or destruction of personal data;
- 2.7. Operator is a state body, municipal body, legal entity or a private person, arranging or performing personal data processing on its own or together with other persons/bodies along with determination of personal data processing goals, contents of personal data, which is the subject of processing, actions (operations), taken with personal data;
- 2.8. Personal Data is any information, directly or indirectly related to a particular user of https://gusi-lebedi.com website or to a person under consideration;
- 2.9. User is any person, visiting https://gusi-lebedi.com website;
- 2.10. Personal Data Provision are actions resulting into personal data disclosure to a particular person or a group of people;
- 2.11. Personal Data Distribution are any actions, resulting into personal data disclosure to unspecified group of people (personal data transfer) or access to personal data by general public, including personal data disclosure in mass media, its publication in information and telecommunication networks or provision of access to personal data in any other way;

2.12. Cross-Border Transfer of Personal Data is a transfer of personal data to the territory of a foreign state, to a state body of a foreign state, foreign person or foreign legal entity;

2.13 Destruction of Personal Data are any actions, resulting in complete erasure of personal data with no possibility of its restoration in a personal data information system and (or) destruction of a physical storage media of personal data.

3. The Operator is entitled to process the following personal data of a User

3.1. Last name, given name, and patronymic

3.2. Electronic mail

3.3. Telephone numbers

3.4. The website also collects and processes anonymised data about visitors (including cookie files), applying Internet statistics services (Yandex Metrics and Google Analytics, etc.)

3.5. The above-mentioned data hereinafter are referred to as the Personal Data in the text of the present Policy.

4. Goals of the Personal Data Processing

4.1. The goal of the user's personal data processing shall be information distribution to a user by means of electronic mail.

4.2. The Operator shall also be entitled to send a User a notification on new products and services, special offers and various upcoming events. A User shall always be entitled to refuse to receive such information messages by sending the Operator an electronic mail via e-mail to hello@gusi-lebedi.com with the following subject: Refusal to Receive Notifications on New Products, Services of Special Offers.

4.3. Anonymised data of users, collected with Internet statistics services, shall be applied to collect information on actions of Users on a website, and improve the website quality and content.

5. Legal Framework of Personal Data Processing

5.1. The Operator processes User's personal data only in case if users fill in/send the data themselves via special forms, located at <https://gusi-lebedi.com> website. By filling in/sending a form with personal data to the Operator, a User provides consent with the present Policy.

5.2. The Operator shall process User's data in case it is allowed in User's browser settings (when cookie files tracking and JavaScript technology are on).

6. Collection, Storage, Transfer and Other Types of Personal Data Processing

Security of personal data, processed by the Operator, shall be guaranteed by legal, organisational and technical means, necessary for complete compliance with the terms of the effective legislation, concerning personal data security.

6.1. The Operator shall guarantee security of personal data and take all measures to exclude access to personal data by unauthorised persons.

6.2. User's personal data shall never be transferred to any third party, with the exclusion of case of compliance with the effective legislation.

6.3. In case of inaccuracy of personal data, Users shall be capable of actualising them themselves by sending a message to the Operator's e-mail: hello@gusi-lebedi.com with the following subject: Personal Data Actualisation.

6.4. The term for personal data processing shall not be limited. A User shall be entitled to withdraw their consent for personal data processing by send the Operator an e-mail with the following subject: Withdrawal of the Personal Data Processing Consent, to the Operator's e-mail address hello@gusi-lebedi.com .

7. Cross-Border Transfer of Personal Data

7.1. Prior to cross-border transfer of personal data, the Operator shall make sure that a foreign state, where personal data is being transferred, guarantees security of such personal data.

7.2. Cross-border transfer of personal data to the territory of foreign states, which do not comply with the above-mentioned requirements, shall be allowed only in case of a written consent of the owner of such data with cross-border transfer of personal data or/and in case of agreement execution, when a party is a subject of personal data.

8. Final Conclusions

8.1. A User shall be entitled to receive any clarifications to any requests, related to their personal data processing by means of contacting the Operator via e-mail: hello@gusi-lebedi.com .

8.2. The present document shall incorporate any updates of the Operator's personal data processing policy. The policy shall be termless until its update.

8.3. The updated version of the Policy shall be located at the following web address: <https://gusi-lebedi.com/privacy/>.