

APPROVED
By Order of the General Director
of LLC «Vani Device»
dated July 1, 2025
No. 47-k

**Personal Data Processing Policy of Limited Liability
Company «Vani Device» on the website**

1. General provisions

- 1.1. This document (hereinafter referred to as the Policy) defines the policy regarding the processing of personal data of users of the website of Limited Liability Company «Vani Device» (hereinafter referred to as the Operator) on the website in the information and telecommunications network Internet at the following URL: <https://vanidevice.ru/> (hereinafter referred to as the Website).
- 1.2. This Policy has been developed on the basis of clause 2, Part 1, Article 18.1 of Federal Law № 152-FZ of July 27, 2006 «On Personal Data», as well as the Recommendations for drafting a document defining the operator's policy regarding the processing of personal data, in the procedure established by Federal Law No. 152-FZ of July 27, 2006 «On Personal Data».
- 1.3. In compliance with the requirements of Part 2 of Article 18.1 of Federal Law № 152-FZ "On Personal Data" of July 27, 2006, the Policy is published in the public domain in the information and telecommunications network Internet on the Operator's Website at the at the following URL: <https://vanidevice.ru/>
- 1.4. This Privacy Policy applies exclusively to the Website. The Operator does not control and is not responsible for third-party websites that the User may access via links available on the Website.
- 1.5. The concepts contained in Article 3 of Federal Law № 152-FZ "On Personal Data" of July 27, 2006 are used in this Policy with the same meaning.
- 1.6. This Policy also uses the following terms: the User – any person visiting the Website and using the information, materials, and services of the Website. The Website User is a personal data subject within the meaning of Federal Law № 152-FZ of July 27, 2006, "On Personal Data."
Website Services - interactive (dialogue) software components on the Website pages used for integration with information systems and provide users of the Website with certain information access options.
- 1.7. Rights and obligations of the Operator.
 - 1.7.1. The Operator is obliged to:
 - process personal data exclusively for the purposes specified in the Policy, in accordance with the procedure established by the current legislation of the Russian Federation, and take measures necessary and sufficient to ensure the fulfillment of the obligations stipulated by Federal Law № 152-FZ of July 27, 2006 "On Personal Data" and regulatory legal acts adopted in accordance with it;
 - not disseminate personal data without the User's consent, unless otherwise provided by the current legislation of the Russian Federation;

- carry out the processing personal data in compliance with the principles and rules stipulated by Federal Law № 152-FZ of July 27, 2006 "On Personal Data";
- organize the protection of personal data in accordance with the requirements of the legislation of the Russian Federation;
- consider the User's (or his/her legal representative's) requests regarding the processing of personal data and provide reasoned responses;
- provide the User (or his/her legal representative) with free access to his/her personal data;
- take measures to update, block, and destroy the User's personal data in cases established by Federal Law № 152-FZ of July 27, 2006 "On Personal Data".

1.7.2. The operator has the right to:

- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations stipulated by Federal Law №152-FZ of July 27, 2006 "On Personal Data" and regulatory legal acts adopted in accordance with it, unless otherwise provided by Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" or other federal laws;
- entrust the processing of personal data to another person with the User's consent, unless otherwise provided by federal law, on the basis of an agreement concluded with such person, including a state or municipal contract, or by the adoption of an appropriate act by a state organ or municipal authority;
- in the event of the User withdraw consent to the processing of personal data, continue processing the personal data without the User's consent if there are grounds specified in Federal Law No. 152-FZ of July 27, 2006 "On Personal Data";
- receive from the User reliable information and/or documents containing the User's personal data for the processing purposes specified in clause 2.2 of the Policy;
- require the User to timely update the provided personal data.

1.8. Rights and obligations of the User.

1.8.1. The User is obliged to:

- to ensure the accuracy of the personal data provided to the Operator that is necessary for the processing purposes stipulated in clause 2.2 of the Policy;
- when necessary, provide the Operator with information for rectification (updating, changing) of provided personal data.

1.8.2. The User has the right to:

- to receive complete information concerning the processing of his/her personal data by the Operator, except in cases stipulated set forth by Russian legislation;
- to have his/her personal data updated, blocked or destroyed if the personal data are incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing;
- to withdraw consent to the processing of personal data;
- take measures provided by law to protect his/her rights;
- appeal against unlawful actions or omissions of the Operator in the processing of

his/her personal data to the authorized body for the protection of the rights of personal data subjects or in court;
as a variant: - give prior consent to the processing of personal data for the purpose of receiving advertising.

The Operator and the Users also have other rights and bear other obligations stipulated by the legislation of the Russian Federation.

2. PURPOSES OF PERSONAL DATA PROCESSING

2.1. The processing of personal data is limited to the achievement of specific, pre-defined and lawful purposes. Processing of personal data incompatible with the purposes of the collection of personal data is not permitted. The processed personal data shall not be excessive in relation to the stated purposes of his/her processing. Only personal data that meet the purposes of his/her processing shall be processed.

2.2. The Operator processes the User's personal data for the following purposes:

2.2.1. Identification of the User registered on the Website.

2.2.2. Informing about the operation of the Website (Services), monitoring and improving the quality of the Services.

2.2.3. Granting the User access to personalized resources of the Website.

2.2.4. Establishing feedback with the User, including sending notifications, requests concerning the use of the Website, provision of services, performance of works, processing requests and applications from the User.

2.2.5. Determining the User's location to ensure security, prevent fraud using the User's personal data on the Website.

2.2.6. Creating an account for interaction, if the User has consented to the creation of an account.

2.2.7. Providing the User with effective client and technical support in case of problems related to the use of the Website.

2.2.8. Sending advertising to the User with his/her prior consent.

3. LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

3.1. The legal grounds for processing personal data by the Operator are:

- Constitution of the Russian Federation
- Civil Code of the Russian Federation;
- Federal Law No. 149-FZ of 27.07.2006 «On Information, Information Technologies and Information Protection»
- Federal Law No. 294-FZ of 26.12.2008 «On Protection of Rights of Legal Entities and Individual Entrepreneurs in the Exercise of State Control (Supervision) and Municipal Control»;
- Decree of the President of the Russian Federation No. 188 of March 6, 1997 «On Approval of the List of Confidential Information»;
- Resolution of the Government of the Russian Federation No. 1119 of November

- 1, 2012 «On Approval of Requirements for the Protection of Personal Data during his/her Processing in Personal Data Information Systems»;
- Order of the Federal Service for Technical and Export Control of Russia No. 21 of February 18, 2013 «On Approval of the Composition and Content of Organizational and Technical Measures to Ensure the Security of Personal Data during his/her Processing in Personal Data Information Systems»;
- consent to the processing of personal data on the Website;

4. SCOPE AND CATEGORIES OF PROCESSED PERSONAL DATA, CATEGORIES OF PERSONAL DATA SUBJECTS

- 4.1. The Operator may process personal data of the following Users: visitors of the Operator's Website.
- 4.2. The personal data processed by the Operator include (select as applicable):
 - Surname, first name, patronymic of the User;
 - place of residence (region/city);
 - mobile phone number;
 - e-mail address;
 - data that are automatically transmitted to the Website Services in the process of his/her use with the help of the software installed on the User's device, namely: IP address, cookie data, information about the User's browser (or other program used to access the Services), technical characteristics of the equipment and software used by the User, date and time of access to the Services, addresses of requested pages, history of queries and views on the Website and its Services.
- 4.3. The Operator ensures that the content and scope of the processed personal data correspond to the stated processing purposes stipulated in Section 2 of the Policy.
- 4.4. Processing of biometric personal data, special categories of personal data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, intimate life, is not carried out by the Operator

5. PROCEDURE AND CONDITIONS FOR PROCESSING PERSONAL DATA

- 5.1. The processing of personal data by the Operator is carried out in accordance with the requirements of the legislation of the Russian Federation by the following methods:
 - non-automated processing of personal data;
 - automated personal data processing with or without transmission of the obtained information via information and telecommunications networks;
 - mixed processing of personal data.
- 5.2. The list of actions performed by the Operator with the User's personal data for the purposes stipulated in clause 2.2 of the Policy (select as applicable): collection, recording, systematization, accumulation, storage, updating (supplementation, modification), retrieval, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion, destruction.
- 5.3. The processing of personal data is carried out by the Operator subject to receipt

the User's consent (hereinafter – Consent) obtained in accordance with the requirements of Federal Law No. 152-FZ of July 27, 2006 «On Personal Data», except for cases established by the legislation of the Russian Federation where the processing of personal data may be carried out without such Consent.

5.4. The User makes a decision on providing his/her personal data and gives Consent freely, by his/her own will and in his/her own interest.

5.5. The period of processing of personal data is determined by the achievement of the purposes for which the personal data were collected, unless a different period is provided for by an agreement with the User or by the current legislation.

The condition for termination of personal data processing may be the achievement of the purposes of personal data processing or no further need to achieve these purposes, the expiration of the Consent or the withdrawal of Consent by the User, as well as the detection of unlawful processing of personal data.

5.6. Consent may be withdrawn by a statement in any form.

5.7. The Operator disseminates personal data permitted by the User for dissemination, i.e. performs actions aimed at public accessibility, in compliance with the requirements, prohibitions and conditions established by part 9 of article 9, Article 10.1 of Federal Law No. 152-FZ of July 27, 2006 «On Personal Data». Disclosure to third parties and dissemination of personal data without the User's consent is not allowed, unless otherwise provided by federal law. The consent to the processing of personal data permitted by the User for dissemination is executed separately from other consents of the User to the processing of his/her personal data, taking into account the Requirements for the content of consent to the processing of personal data permitted by the personal data subject for dissemination, approved by Order of Roskomnadzor No. 18 of February 24, 2021.

5.8. When processing personal data, the Operator shall take or ensure the adoption of necessary 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.

5.9. Storage of personal data is carried out in a form that allows identifying the User, for a period no longer than required by the purposes of personal data processing, unless the storage period of personal data is established by federal law, an agreement to which the User is a party, beneficiary or surety.

5.10. When processing personal data, the Operator complies with the requirements of Article 18 of Federal Law No. 152-FZ of July 27, 2006 «On Personal Data».

5.11. When processing personal data, the Operator undertakes to maintain the confidentiality of personal data.

5.12. Cross-border transfer of personal data is not carried out by the Operator..

5.13. In the event of unlawful or accidental transfer (provision, dissemination, access) of personal data, the Operator informs the User thereof within 3 days.

5.14. The Operator, together with the User, takes all necessary measures to prevent losses or other negative consequences caused by the unlawful or accidental transfer (provision, dissemination, access) of the User's personal data.

6. BLOCKING, UPDATING AND DESTRUCTION OF PERSONAL DATA. RESPONSES TO USER REQUESTS FOR ACCESS TO PERSONAL DATA

6.1. In the event of detection of unlawful processing of personal data upon the User's (or his/her representative's) application or upon the User's (or his/her representative's) request or upon the request of the authorized body for the protection of the rights of personal data subjects, the Operator blocks the unlawfully processed personal data relating to the respective User, or ensures his/her blocking from the moment of such application or receipt of the specified request of the User for the period of verification.

In the event of detection of inaccurate personal data upon the User's or his/her representative's application or upon his/her request or upon the request of the authorized body for the protection of the rights of personal data subjects, the Operator blocks the personal data relating to this User, or ensures his/her blocking from the moment of such application or receipt of the specified request for the period of verification, if blocking of the personal data does not violate the rights and legitimate interests of the User or third parties.

6.2. In the event of confirmation of the inaccuracy of the personal data, the Operator, on the basis of information provided by the User (or his/her representative) or by the authorized body for the protection of the rights of personal data subjects, or other necessary documents, updates the personal data or ensures his/her updating within seven working days from the date of submission of such information.

6.3. In the event of detection of unlawful processing of personal data, the Operator, within a period not exceeding three working days from the date of this detection, ceases the unlawful processing of personal data or ensures the cessation of the unlawful processing of personal data, and in the event that it is impossible to ensure the lawfulness of the processing of personal data, within a period not exceeding ten working days from the date of detection of the unlawful processing of personal data, destroys such personal data or ensures his/her destruction.

6.4. In the event of achievement of the purpose of personal data processing, the Operator destroys the personal data or ensures his/her destruction within a period not exceeding thirty days from the date of achievement of the purpose of personal data processing, unless otherwise provided by an agreement to which the User is a party, beneficiary or surety, by another agreement between the Operator and the User, or if the Operator is not entitled to carry out the processing of personal data without the User's consent on the grounds provided for by Federal Law No. 152-FZ of July 27, 2006 «On Personal Data» or other federal laws.

6.5. In the event the User withdraws consent to the processing of his/her personal data and in the event that the retention of the personal data is no longer required for the purposes of personal data processing, the Operator destroys the personal data or ensures his/her destruction within a period not exceeding thirty days from the date of receipt of the said withdrawal, unless otherwise provided by an agreement to which the User is a party, beneficiary or surety, by another agreement between the Operator and the User, or if the Operator is not entitled to carry out the processing of personal data without the User's consent on the grounds provided for by Federal

Law No. 152-FZ of July 27, 2006 «On Personal Data» or other federal laws.

6.6. Within a period not exceeding seven working days from the date of submission by the User (or his/her representative) of information confirming that such personal data were unlawfully obtained or are not necessary for the stated purpose of processing, the Operator destroys such personal data.

6.7. The processed personal data are subject to destruction in the event of loss of the need to achieve the purposes of processing, unless otherwise provided by federal law.

6.8. The Operator responds to requests and applications of the User (or his/her representative) concerning the processing of his/her personal data carried out by the Operator in writing to the User's e-mail.

7. LIABILITY OF THE PARTIES

7.1. The Operator shall be liable for violation of the requirements of Federal Law of July 27, 2006 No. 152-FZ «On Personal Data» in accordance with the legislation of the Russian Federation.

7.2. The User shall be entitled to claim compensation for damages and/or compensation for moral harm in court. Moral harm caused to the User as a result of violation of his/her rights, violation of the rules for processing personal data, as well as the requirements for the protection of personal data established in accordance with Federal Law of July 27, 2006 No. 152-FZ «On Personal Data», as well as the provisions of the Policy, shall be compensated in accordance with the legislation of the Russian Federation. Compensation for moral harm shall be made independently of compensation for property damage and losses incurred by the User.

8. DISPUTE RESOLUTION

8.1. In the event of disputes and/or disagreements arising from the relations between the User and the Operator, such matters shall be resolved in accordance with the current legislation of the Russian Federation.

8.2. The Policy and the relations between the User and the Operator shall be governed by the current legislation of the Russian Federation.

9. FINAL PROVISIONS

9.1. The Operator is entitled to make changes to the Policy without the User's consent.

9.2. The new version of the Policy shall enter into force from the moment it is posted on the Website, unless otherwise provided by the new version of the Policy. The new version of the Policy shall apply to relations arising after its entry into force.

9.3. All suggestions or questions regarding the Policy should be sent to the e-mail: info@vanidevices.ru