

LIMITED LIABILITY COMPANY
“LINTEGA”
OGRN 1267700234757 INN 9717194290
129626, Moscow, Mira Avenue, 102, bldg. 12, premises 3n/5

APPROVED
by Order of the General Director
of LINTEGA LLC
dated 9 September 2026
No. 09/09-1-P

Personal Data Processing Policy (for Website users)

1. Terms and Definitions

1.1. Website — a set of software and hardware for electronic computing machines (ECMs) intended for publishing and presenting information and data accessible to any Internet user, located at: <https://vetvrachgoda.vetandlife.ru>

1.2. Operator — an organization that, independently or jointly with other persons, organizes the processing of personal data and determines the purposes of processing personal data, the personal data to be processed, and the actions (operations) performed with personal data. The Operator is the organizer of the International Award in the Field of Veterinary Medicine for Small Companion Animals “Vettoria” (hereinafter referred to as the Operator and the Organizer).

Operator’s name: LIMITED LIABILITY COMPANY “LINTEGA”, OGRN (Primary State Registration Number) 1267700234757, INN (Taxpayer Identification Number) 9717194290.
Operator’s address: 129626, Moscow, Mira Avenue, 102, bldg. 12, premises 3n/5.

1.3. Competition (Award) — the International Award in the Field of Veterinary Medicine for Small Companion Animals “Vettoria”, a professional competition of veterinarians held by the Operator during the period **from September 2026 to April 2027** in accordance with the Regulations on the Award.

1.4. Regulations — the Regulations on the International Award in the Field of Veterinary Medicine for Small Companion Animals “Vettoria”, approved by the Organizing Committee and posted on the Website. The Regulations constitute a public offer; submission of an application means the participant’s full acceptance of the terms of the Regulations.

1.5. **General Partner** — NITA-FARM LLC, the general partner of the Competition in accordance with the Regulations.

1.6. Data subject — an individual to whom the personal data provided to the Operator through the Website or by other means in connection with the Competition belong (Participant, Voter, Jury Member, Prospective Partner, or any other person interacting with the Operator).

1.7. Participant — an individual who has submitted an application to participate in the Competition through the online platform of the Website in accordance with the requirements of the Regulations.

1.8. Voter — an individual participating in public voting in the “Audience Favorite” nomination by authorizing through the VKontakte social network and voting on the website.

1.9. Prospective Partner — an individual who has completed the “Become a Partner” form on the Website in order to propose partnership cooperation in conducting the Competition.

1.10. User — an individual interacting with the functionality of the Website in any way, including visiting pages, sending requests through feedback forms, voting, or submitting an application to participate in the Competition.

1.11. Personal data — any information relating directly or indirectly to an identified or identifiable individual (data subject).

1.12. Processing of personal data — any action (operation) or set of actions (operations) performed with personal data, whether with or without the use of automation tools, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion and destruction of personal data.

1.13. Automated processing of personal data — processing of personal data by means of computer technology.

1.14. Cross-border transfer of personal data — transfer of personal data to the territory of a foreign state to public authorities, individuals or legal entities of another state.

1.15. Restricted-access information — information access to which is restricted by federal laws of the Russian Federation or by an agreement between the Operator and the data subject.

1.16. Dissemination of personal data — actions aimed at disclosing personal data to an indefinite number of persons (for example, publication in the mass media, posting on the Internet, or providing access to a wide range of persons).

1.17. Blocking of personal data — temporary suspension of the processing of personal data (except where processing is necessary to clarify the personal data).

1.18. Destruction of personal data — irreversible actions that make it impossible to restore personal data in a personal data information system and/or the destruction of physical media containing personal data.

1.19. Cookie — a small piece of data sent by a web server and stored on the User’s device, which the Website uses to identify the User, configure the operation of the Website and collect visit statistics.

1.20. Competition materials — the description of the competition entry, the participant’s photograph, video application, documents confirming professional achievements (medical histories, discharge summaries, treatment protocols), letters of recommendation and other materials provided by the Participant as part of the application to participate in the Competition.

2. General Provisions

2.1. This Policy has been prepared in accordance with the provisions of Federal Law of the Russian Federation of 27 July 2006 No. 152-FZ “On Personal Data”. It governs the procedure for collecting, storing, transferring and protecting the personal data of users of the Website <https://vetvrachgoda.vetandlife.ru> (hereinafter referred to as the Website) in connection with the International Award in the Field of Veterinary Medicine for Small Companion Animals “Vettoria” and is aimed at meeting the requirements of Russian legislation on protecting the confidentiality of personal data and preventing unauthorized access to it.

2.2. This Policy is intended to inform users of the Website — Competition participants, voters, prospective partners and other persons interacting with the Operator through the Website — of the procedure and conditions for processing their personal data, the rights and obligations of the parties relating to the processing of such information, the methods of protecting confidential data, and the procedure for notification in the event of changes to the processing conditions.

2.3. This document applies to all information relating to the processing of users’ personal data that is provided voluntarily when submitting an application to participate in the Competition, voting, completing the “Become a Partner” form or other feedback forms, as well as data collected automatically by the Website (cookies, technical data).

2.4. This Policy is binding on all Operator employees responsible for handling personal data and on any third parties to whom personal data are transferred in accordance with the applicable regulatory acts of the Russian Federation and the Regulations on the Award.

3. Legal Grounds for Processing Personal Data

3.1. The legal grounds for the Operator’s processing of personal data are:

Federal Law of the Russian Federation of 27 July 2006 No. 152-FZ “On Personal Data”;
Federal Law of the Russian Federation of 27 July 2006 No. 149-FZ “On Information, Information Technologies and Information Protection”;
Federal Law of the Russian Federation of 13 March 2006 No. 38-FZ “On Advertising”;
Federal Law of the Russian Federation of 10 December 2003 No. 173-FZ “On Currency Regulation and Currency Control”;
Tax Code of the Russian Federation;
Regulations on the International Award in the Field of Veterinary Medicine for Small Companion Animals “Vettoria”, which constitute a public offer (Clause 1.9 of the Regulations);
The Operator’s constituent documents;
Applicable regulatory legal acts of the Russian Federation in the field of personal data protection;
The consents of data subjects to the processing of their data, including consent to the processing of personal data authorized for dissemination and separate consent to the processing of special categories of personal data.

3.2. The Operator processes personal data when data subjects complete the relevant forms themselves and send data to the Operator through the Website or by email, and also through automatic data collection by the Website (cookies, technical data). Data subjects express their consent to the terms of this Policy by completing forms, ticking checkboxes and submitting data.

3.3. In certain cases provided for by the Regulations, the Operator may request additional data from data subjects (a certificate of no criminal record, documents for the identification of non-residents, bank details)

outside the Website — by email or other communication channels. Such data are processed on the basis of the data subject's separate consent or pursuant to the requirements of the legislation of the Russian Federation.

4. Procedure and Conditions for Processing Personal Data

4.1. Purpose of personal data processing:

Organization and holding of the International Award in the Field of Veterinary Medicine for Small Companion Animals “Vettoria”, including the full operational cycle of participant support:

- receipt, registration and preliminary moderation of Applications (checking the completeness of documents and the Participant's compliance with the requirements of the Regulations);
- evaluation of competition entries by the professional Jury (including representatives of the General Partner, the company NITA-FARM);
- formation of shortlists;
- determination of Winners and organization of their participation in the Awards Ceremony and the presentation of prizes;
- communication with participants through all communication channels at the stages of the Competition;
- reporting, as well as consideration of inquiries and appeals and protection of the Operator's legitimate interests.

Categories of personal data processed — general / other personal data:

Full name; email address; telephone number; citizenship; country, city; place of work (clinic, organization); position; specialization; length of service in the specialty; copy of the higher veterinary education diploma; copy of the employment record book or an extract from it; competition materials (description of the competition entry, medical histories, discharge summaries, treatment protocols, other documents confirming professional achievements); letters of recommendation from colleagues, heads of organizations and professional associations; attestations, diplomas and certificates of completion of professional training; audiovisual materials: image (photograph, video recording), including the image in a video application; voice (audio recording) captured in video materials.

Note: The Operator does not process biometric data and does not identify data subjects by voice, video or photograph; processing is carried out solely for the purpose of evaluating the content of the competition entry in accordance with Clause 4.1.

Data subjects: Competition Participants.

Method of processing personal data:

Personal data are processed by the following methods: in information systems using automation tools; without the use of automation tools, on paper media; mixed processing.

In information systems using automation tools, personal data may be transmitted by the following means: over the legal entity's internal network; over the Internet.

The following actions are performed in processing personal data: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (provision, access), blocking, deletion and destruction of personal data.

Automated processing includes: collection of data through application forms hosted on the FormDesigner platform and accessible from a Website page; processing of data in the Bitrix24 customer relationship management system.

Transfer to third parties

Personal data are transferred to third parties — service providers that ensure the technical operation of application intake and the storage and management of participant data: Individual Entrepreneur V. E. Rymarchuk (FormDesigner platform), 1C-Bitrix LLC (Bitrix24 platform). The full list of third parties, the categories of data transferred and the purposes of transfer are set out in the section “Transfer of Personal Data to Third Parties” of this Policy. The transferred data are processed in the territory of the Russian Federation.

Period of processing and storage of data:

Personal data are processed until the purposes of processing are achieved (the Competition is completed and results are announced). After the Competition ends, personal data are stored for 1 (one) year for the purposes of resolving possible disputes and appeals and complying with the requirements of Russian legislation, after which they are subject to destruction.

The storage period for personal data transferred to third parties is determined by agreements between the Operator and the relevant service providers, taking into account the periods specified in this section. If consent to personal data processing is withdrawn or the purposes of processing are achieved, the Operator notifies third parties of the need to stop processing and destroy the transferred data. Third parties are obliged to take the actions to stop processing and destroy data that are required by Federal Law of 27.07.2006 No. 152-FZ “On Personal Data” and by their agreements with the Operator.

Withdrawal of consent:

A data subject may withdraw consent to the processing of personal data at any time.

- Before the end of the Competition: withdrawal of consent to the processing of personal data required for participation in the Competition makes it impossible for the data subject to continue participating in the Competition and results in the data subject’s exclusion from the participants in accordance with Clause 11.4 of the Regulations. In this case, personal data are subject to destruction within 30 (thirty) days from receipt of the withdrawal, except for data whose processing is necessary to comply with the requirements of Russian legislation.

- After the end of the Competition: withdrawal of consent to the processing of personal data does not extend to data whose storage is necessary to comply with the requirements of Russian legislation (including for the purposes of resolving disputes and appeals). Such data are subject to destruction upon expiry of the storage period established by law or by the Regulations.

Procedure for destruction of personal data:

Personal data are destroyed by deleting the relevant records from the Operator’s information systems and databases and by physically destroying paper documents (if any) in ways that prevent third parties from recovering the information. Destruction is documented by authorized employees of the Operator.

Legal basis for processing personal data:

- Consent of the data subject to the processing of their personal data (Clause 1 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ “On Personal Data”);
- Performance of a contract to which the data subject is a party (Clause 5 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ “On Personal Data”), since submission of an application to participate in the Award constitutes acceptance of a public offer (Clause 1.9 of the Regulations).

4.2. Purpose of personal data processing:

Publication and dissemination of information about Competition Participants (including the formation of shortlists and the announcement of Winners), coverage of the progress and results of the Competition and of the Awards Ceremony, and of Participants' professional achievements in industry media, on the official internet resources of the Organizer, the General Partner and their partners.

Categories of personal data processed — general / other personal data:

Full name; place of work (clinic, organization); position; specialization; description of professional achievements; description of the competition entry; other competition materials provided by the participant to the Operator; results of the participant's evaluation in the Competition; audiovisual materials: image (photograph, video recording), including the image in a video application; voice (audio recording) captured in video materials.

Note: The Operator does not process biometric data. The image and voice are processed solely for the purpose of public coverage of the event. Individuals are not identified by biometric characteristics.

Data subjects: Competition Participants.

Method of processing personal data: Personal data are processed by the following methods: in information systems using automation tools; without the use of automation tools, on paper media; mixed processing.

In information systems using automation tools, personal data may be transmitted by the following means: over the legal entity's internal network; over the Internet.

The following actions are performed in processing personal data: collection, recording, systematization, accumulation, storage, clarification, retrieval, use, transfer (dissemination, provision, access), blocking, deletion and destruction of personal data; including posting (publication) on the Internet — on the Competition website, in partner industry online publications and on social networks, as well as without the use of automation tools (publication in print media). Published materials become publicly available.

The specific addresses of the information resources on which the data are posted are determined in the data subject's consent to dissemination.

The list of categories of personal data permitted for dissemination, as well as the list of prohibitions and conditions on their processing, is established by the data subject independently when giving consent to dissemination.

Period of processing and storage of data:

Personal data are processed until the purposes of processing provided for in this clause are achieved, or until one of the following events occurs:

- withdrawal by the data subject of consent to processing;
- expiry/revocation of the license to use the competition materials;
- another event provided for by law.

Upon achievement of the purposes of processing or receipt of a withdrawal of consent to processing, the Operator destroys the personal data within a period not exceeding 30 (thirty) days, unless a different period is provided for by law.

Upon receipt of a demand to stop the dissemination of personal data, their publication ceases from the date such demand is received, while the data themselves continue to be stored by the Operator until the expiry of the periods established by law.

In performing its obligation to stop the dissemination of personal data, the Operator:

- deletes the personal data from all information resources managed by the Operator;
- notifies third parties to whom personal data were transferred of the need to stop their further dissemination and to destroy them.

The Operator is not liable for the actions of third parties or for the retention of data on third-party resources if such data were copied or disseminated by third parties before the Operator deleted them.

Legal basis for processing personal data:

- Consent of the data subject to the processing of their personal data (Clause 1 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ “On Personal Data” (hereinafter the Law), including consent to the dissemination of personal data obtained in accordance with Article 10.1 of that Law;
- Performance of a contract to which the data subject is a party (Clause 5 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ “On Personal Data”), since submission of an application to participate in the Award constitutes acceptance of a public offer (Clause 1.9 of the Regulations).

4.3. Purpose of personal data processing:

Transfer of participants’ personal data and competition materials to the General Partner of the Competition, NITA-FARM LLC, for processing for marketing purposes, including the use of competition materials in the partner’s advertising and information materials.

Categories of personal data processed — general / other personal data:

Full name; place of work (clinic, organization); position; specialization; description of professional achievements; description of the competition entry; other competition materials provided by the participant to the Operator; audiovisual materials: image (photograph, video recording), including the image in a video application; voice (audio recording) captured in video materials.

Data subjects: Competition Participants.

Recipient of personal data: NITA-FARM LLC (the general partner of the Competition). The recipient processes the transferred personal data as an independent operator in accordance with Federal Law of 27.07.2006 No. 152-FZ “On Personal Data”.

Method of processing:

Storage, use, and transfer (provision, access) of personal data and competition materials to the General Partner for use in the General Partner’s advertising and information materials. Processing is carried out by a mixed method — with and without the use of automation tools. In information systems using automation tools, personal data may be transmitted over the Internet.

Period of processing and storage of data:

The Operator transfers personal data to the General Partner, subject to the participant’s consent, during the period of the Competition. Further processing and storage of personal data transferred to the General Partner are carried out by NITA-FARM LLC as an independent operator in accordance with its own personal data processing policy.

Withdrawal of consent:

If the data subject withdraws consent, the Operator must stop transferring personal data to the General Partner and notify it of the withdrawal of consent within 30 (thirty) days from receipt of the withdrawal. With respect to personal data already transferred to the General Partner, the data subject may send the withdrawal of consent directly to NITA-FARM LLC. The Operator is not liable for the actions of the General Partner, which processes data as an independent operator.

Legal basis for processing personal data:

- Consent of the data subject to the processing of their personal data (Clause 1 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ “On Personal Data”).

4.4. Purpose of personal data processing:

Transfer of participants’ personal data to the General Partner of the Competition, NITA-FARM LLC, for processing for the purpose of selecting candidates for vacant positions, including the consideration of candidates for employment.

Categories of personal data processed — general / other personal data:

Full name; citizenship; place of work (clinic, organization); position; specialization; description of professional achievements; telephone number; email address.

Data subjects: Competition Participants.

Recipient of personal data: NITA-FARM LLC (the general partner of the Competition). The recipient processes the transferred personal data as an independent operator in accordance with Federal Law of 27.07.2006 No. 152-FZ “On Personal Data”.

Method of processing:

Storage, use, and transfer (provision, access) of personal data and competition materials to the General Partner. Processing is carried out by a mixed method — with and without the use of automation tools. In information systems using automation tools, personal data may be transmitted over the Internet.

Period of processing and storage of data:

The Operator transfers personal data to the General Partner, subject to the participant’s consent, during the period of the Competition. Further processing and storage of personal data transferred to the General Partner are carried out by NITA-FARM LLC as an independent operator in accordance with its own personal data processing policy.

Withdrawal of consent:

If the data subject withdraws consent, the Operator must stop transferring personal data to the General Partner and notify it of the withdrawal of consent within 30 (thirty) days from receipt of the withdrawal. With respect to personal data already transferred to the General Partner, the data subject may send the withdrawal of consent directly to NITA-FARM LLC. The Operator is not liable for the actions of the General Partner, which processes data as an independent operator.

Legal basis for processing personal data:

- Consent of the data subject to the processing of their personal data (Clause 1 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ “On Personal Data”).

4.5. Purpose of personal data processing:

Sending informational mailings to Competition participants — Award news, notifications about the stages of the Competition and other informational correspondence.

Categories of personal data processed — general personal data:

Full name; email address; telephone number.

Data subjects: Competition Participants.

Method of processing: Collection, recording, systematization, accumulation, storage, use, transfer (provision, access), blocking, deletion and destruction of personal data. Processing is carried out using automation tools. In information systems using automation tools, personal data may be transmitted over the Internet.

Transfer to third parties: Personal data are transferred to third parties — service providers that ensure the technical operation of mailings: Unisender SMART LLC (UniSender platform). The full list of third parties, the categories of data transferred and the purposes of transfer are set out in the section “Transfer of Personal Data to Third Parties” of this Policy. The transferred data are processed in the territory of the Russian Federation.

Period of processing and storage of personal data:

Personal data are processed and stored until the purpose of processing is achieved, or until an unsubscribe request or a withdrawal of consent to personal data processing is received. After the purpose is achieved, or consent is withdrawn or a subscription is cancelled, the data are subject to destruction.

The storage period for personal data transferred to third parties is determined by agreements between the Operator and the relevant service providers, taking into account the periods specified in this section. If consent to personal data processing is withdrawn, a subscription is cancelled or the purposes of processing are achieved, the Operator notifies third parties of the need to stop processing and destroy the transferred data. Third parties are obliged to take the actions to stop processing and destroy data that are required by Federal Law of 27.07.2006 No. 152-FZ “On Personal Data” and by their agreements with the Operator.

Procedure for destruction of personal data:

Personal data are destroyed by automatically deleting the relevant records from the subscriber database and the Operator’s information systems. The fact of destruction is confirmed in writing by authorized employees.

Withdrawal of consent:

- A data subject may withdraw consent to the processing of personal data at any time by sending the Operator a corresponding notice in the manner specified in this Policy.
- A data subject may withdraw consent to mailings at any time by sending the Operator a corresponding notice to the email address specified in the Policy or by clicking the “Unsubscribe” link in the text of the informational mailing.

Withdrawal of consents results in the termination of informational mailings.

Legal basis for processing personal data:

- Personal data are processed with the consent of the data subject to the processing of their personal data (Clause 1 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ “On Personal Data”).

4.6. Purpose of personal data processing:

Verification of Competition participants' compliance with the business reputation criteria set out in Clause 3.1 of the Regulations on the Competition (no unexpunged or outstanding criminal conviction), to ensure the security and reputation of the Competition.

Categories of personal data processed — special category (Article 10 of Federal Law of 27.07.2006 No. 152-FZ "On Personal Data"):

Information on the absence of a criminal record contained in a certificate of the presence (absence) of a criminal record and/or of criminal prosecution or of the termination of criminal prosecution, issued in accordance with the established procedure by an authorized state body.

Data subjects: Competition Participants who have passed preliminary moderation (Stage 2, Clause 7.2 of the Regulations).

Method of processing personal data:

Personal data are processed without the use of automation tools (on paper media) and with the use of automation tools, by a mixed method. The following actions are performed in processing personal data: collection, recording, storage, use, transfer (provision, access), clarification (updating, modification), blocking, deletion and destruction of personal data. Personal data are not transferred to third parties. Only authorized employees of the Operator have access to the personal data.

Period of processing and storage of data:

Personal data (the certificate of no criminal record) are processed during the formation of the shortlist (January 2027). The certificate is stored until the official announcement of the Competition results (April 2027) in order to be able to confirm the lawfulness of including the participant in the shortlist or among the winners in the event of disputes. After the final results are determined, the certificate is subject to destruction within 30 (thirty) days, except where its storage is necessary to protect the Operator's rights in court.

Withdrawal of consent:

Withdrawal of consent to the processing of special categories of personal data results in the participant's exclusion from the Competition shortlist in accordance with Clause 3.1 of the Regulations.

Procedure for destruction of personal data:

The certificate is destroyed by physically destroying the paper medium (if any) and deleting the electronic copy from the Operator's information systems in ways that prevent the information from being recovered. Destruction is recorded in a destruction report signed by an authorized employee of the Operator.

Legal basis for processing personal data:

- Personal data are processed with the consent of the data subject to the processing of their personal data (Clause 1 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ "On Personal Data"), including:
- Clause 1 of Part 2 of Article 10 of Federal Law of 27.07.2006 No. 152-FZ "On Personal Data" (processing of special categories of personal data on the basis of the data subject's written consent);
- Article 1057 of the Civil Code of the Russian Federation (the right of the organizer of a public competition to establish participation conditions and participant selection criteria).

Specifics of the form of consent:

Consent to the processing of special categories of personal data is executed as a separate document outside the Website, in written form (on paper with a handwritten signature or as an electronic document signed with an enhanced qualified electronic signature). Consent is a mandatory condition for including the participant in the shortlist. Refusal to give consent or failure to provide the certificate of no criminal record makes it impossible to verify the participant's compliance with the Competition requirements and results in exclusion from the shortlist.

4.7. Purpose of personal data processing:

Identification of foreign Competition participants, assessment of compliance risks (including sanctions risks), and verification that there are no grounds for refusing to pay a cash prize to non-residents of the Russian Federation.

Categories of personal data processed — general/other personal data:

Citizenship; scanned copy of the international passport (surname, given name, citizenship, date of birth, passport number, expiry date, photograph); document confirming the actual residential address; completed identification and risk-assessment questionnaire (in the form sent as an attachment to the request); written representation by the participant that their name and the names of their beneficial owners do not appear in international sanctions lists.

Data subjects: Foreign citizens and stateless persons — Competition participants claiming a cash prize and in respect of whom the Organizer has sent a request.

Method of processing personal data:

Personal data are processed without the use of automation tools (on paper media) and with the use of automation tools, by a mixed method. In information systems using automation tools, personal data may be transmitted by the following means: over the legal entity's internal network; over the Internet. The following actions are performed in processing personal data: collection, recording, storage, use, transfer (provision, access), clarification (updating, modification), blocking, deletion and destruction of personal data. Personal data are not transferred to third parties. Only authorized employees of the Operator responsible for the compliance check have access to the personal data.

Period of processing and storage of data:

Personal data are processed from the time they are received from the participant until the compliance check is completed and a decision is made on admitting the participant to receive the cash prize.

1. Compliance check passed (payment made):

Since the documents received for the compliance check (scanned passport copy, proof of address, questionnaire, representation) are the basis for the decision to pay the cash prize, they are stored as part of the documentation for the relevant currency transaction for 5 (five) years after the end of the reporting year in which the payment was made, in accordance with the requirements of Federal Law of 06.12.2011 No. 402-FZ "On Accounting" and Federal Law of 10.12.2003 No. 173-FZ "On Currency Regulation and Currency Control", and also for the purpose of protecting the Operator's interests within the general limitation period (Article 196 of the Civil Code of the Russian Federation), after which they are subject to destruction.

2. Compliance check not passed (payment not made):

The documents are destroyed within 30 (thirty) days after the end of the Competition, except where retention of the documents is necessary in connection with claims received, lawsuits or other lawful grounds. In such cases, the documents are stored until the relevant dispute is resolved or the period established by law expires, after which they are subject to destruction.

Withdrawal of consent:

Withdrawal of consent to the processing of personal data provided in accordance with Clause 6.2 of the Regulations results in a refusal to pay the cash prize in accordance with Clause 9.5 of the Regulations. The right to receive the in-kind portion of the award (diploma, statuette, publication) is retained. Personal data are subject to destruction within 30 (thirty) days from receipt of the withdrawal, except for data whose processing is necessary to comply with the requirements of Russian legislation.

Procedure for destruction of personal data:

The documents are destroyed by deleting electronic copies from the Operator's information systems and physically destroying paper media (if any) in ways that prevent the information from being recovered. Destruction is recorded in a destruction report signed by an authorized employee of the Operator.

Legal basis for processing personal data:

- Personal data are processed with the consent of the data subject to the processing of their personal data (Clause 1 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ "On Personal Data");
- Performance of a contract to which the data subject is a party (Clause 5 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ "On Personal Data"), since submission of an application to participate in the Award constitutes acceptance of a public offer, and passing the compliance check is a condition of admission to receipt of the cash prize;
- Processing of personal data is necessary to achieve the purposes provided for by law and to carry out and perform the functions, powers and duties imposed on the operator by the legislation of the Russian Federation (Clause 2 of Part 1 of Article 6 of Law No. 152-FZ), including:
 - Federal Law of 10.12.2003 No. 173-FZ "On Currency Regulation and Currency Control" (checking sanctions lists, compliance check for cross-border transfers);
 - Federal Law of 06.12.2011 No. 402-FZ "On Accounting".

Specifics of the form of consent:

Consent to the processing of personal data provided by non-residents in accordance with Clause 6.2 of the Regulations is executed as a separate document outside the Website, in written form (on paper with a handwritten signature or as an electronic document signed with an enhanced qualified electronic signature). The consent form is sent to the participant as an attachment to the request for documents. Consent is a mandatory condition for considering the possibility of paying the cash prize. Refusal to give consent or to provide documents within the established period (5 business days from the date the request is sent) results in refusal to decide on admitting the participant to receive the cash prize and refusal to pay the cash prize, without the right of appeal on this ground.

4.8. Purpose of personal data processing:

Payment of prizes to Competition winners and prizewinners.

Categories of personal data processed — general/other personal data:

Full name; citizenship; bank details (account number, bank name, BIK, correspondent account — for residents; SWIFT code, IBAN, bank name — for non-residents); taxpayer identification number (INN) — for performing the duties of a tax agent; postal address — for sending the in-kind portion of the prize (diploma, statuette), where necessary.

Data subjects:

Competition winners and prizewinners entitled to receive a cash prize.

Method of processing personal data:

Personal data are processed without the use of automation tools (on paper media) and with the use of automation tools, by a mixed method. In information systems using automation tools, personal data may be transmitted by the following means: over the legal entity's internal network; over the Internet. The following actions are performed in processing personal data: collection, recording, storage, use, transfer (to a bank — for transfer of the prize; to the tax authority — as part of tax reporting), clarification (updating, modification), blocking, deletion and destruction of personal data. Only authorized employees of the Organizer responsible for arranging payments have access to the personal data.

Period of processing and storage of data:

Personal data are processed until the purposes of processing are achieved (payment of the cash prize).

Documents containing personal data (payment orders, bank details, tax reporting) are stored for 5 (five) years after the end of the reporting year in which the payment was made, in accordance with the requirements of Federal Law of 06.12.2011 No. 402-FZ "On Accounting", Federal Law of 10.12.2003 No. 173-FZ "On Currency Regulation and Currency Control" (for non-residents) and the Tax Code of the Russian Federation, and also for the purpose of protecting the Operator's interests within the general limitation period (Article 196 of the Civil Code of the Russian Federation), after which they are subject to destruction.

If payment was not made (the participant declined the prize, did not provide bank details within the established period, or payment did not take place for other reasons), personal data are destroyed within 30 (thirty) days after the end of the Competition, except where retention of the documents is necessary in connection with claims received, lawsuits or other lawful grounds. In such cases, the documents are stored until the relevant dispute is resolved or the period established by law expires, after which they are subject to destruction.

Procedure for destruction of personal data:

The documents are destroyed by deleting electronic copies from the Operator's information systems and physically destroying paper media (if any) in ways that prevent the information from being recovered. Destruction is recorded in a destruction report signed by an authorized employee of the Operator.

Legal basis for processing personal data:

- Performance of a contract to which the data subject is a party (Clause 5 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ "On Personal Data"), since submission of an application to participate in the Award constitutes acceptance of a public offer, and payment of the prize is performance of the Organizer's obligation to the winner;
- Processing of personal data is necessary to achieve the purposes provided for by law and to carry out and perform the functions, powers and duties imposed on the operator by the legislation of the Russian Federation (Clause 2 of Part 1 of Article 6 of the said Law), including:
 - Tax Code of the Russian Federation (Articles 226 and 23) (performance of the duties of a tax agent when paying the prize);
 - Federal Law of 06.12.2011 No. 402-FZ "On Accounting";
 - Federal Law of 10.12.2003 No. 173-FZ "On Currency Regulation and Currency Control" (execution of a currency transaction when transferring the prize to a non-resident).

Specifics:

The data subject's consent to processing for this purpose is not required, since processing is carried out in connection with the performance of a contract and the performance of duties imposed on the Organizer by law. Withdrawal of consent previously given to the processing of personal data for other purposes does not terminate processing for this purpose until the obligations to pay the prize have been fully performed and the established storage periods have expired.

4.9. Purpose of personal data processing:

Performance of the duties of a tax agent to calculate, withhold and remit personal income tax (NDFL) on cash prizes paid to Competition winners and prizewinners.

Categories of personal data processed — general/other personal data:

Full name; taxpayer identification number (INN); citizenship; residential address (for completing the income certificate); income details (amount of the cash prize); amount of tax withheld; tax rate; date of payment of income; tax period.

Data subjects:

Competition winners and prizewinners who have received a cash prize.

Method of processing personal data:

Personal data are processed with and without the use of automation tools, by a mixed method. In information systems using automation tools, personal data may be transmitted by the following means: over the legal entity's internal network; over the Internet. The following actions are performed in processing personal data: collection, recording, systematization, storage, use, transfer (to the tax authority — as part of NDFL reporting), clarification (updating, modification), blocking, deletion and destruction of personal data. Only authorized employees of the Organizer responsible for accounting and tax records have access to the personal data.

Period of processing and storage of data:

Personal data are processed until the purpose of processing is achieved — full performance by the Organizer of its duties as a tax agent: calculation, withholding and remittance of personal income tax (NDFL) to the budget, and submission of tax reporting to the tax authority.

Documents containing personal data (income certificates in Form 2-NDFL, tax accounting registers, payment documents for the remittance of NDFL) are stored for 5 (five) years after the end of the reporting year in which the payment was made, in accordance with the requirements of the Tax Code of the Russian Federation (subclause 8 of Clause 1 of Article 23) and Federal Law of 06.12.2011 No. 402-FZ "On Accounting" (Article 29), and also for the purpose of protecting the Operator's interests within the general limitation period (Article 196 of the Civil Code of the Russian Federation), after which they are subject to destruction.

Procedure for destruction of personal data:

The documents are destroyed by deleting electronic copies from the Operator's information systems and physically destroying paper media (if any) in ways that prevent the information from being recovered. Destruction is recorded in a destruction report signed by an authorized employee of the Operator.

Legal basis for processing personal data:

- Processing of personal data is necessary to achieve the purposes provided for by law and to carry out and perform the functions, powers and duties imposed on the operator by the legislation of the Russian Federation (Clause 2 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ “On Personal Data”).

Specifics:

The data subject’s consent to processing for this purpose is not required, since processing is carried out in connection with the performance of the Organizer’s duties as a tax agent imposed by law. A data subject’s refusal to allow processing is not permitted by virtue of a direct requirement of law.

4.10. Purpose of personal data processing:

Organization and holding of public voting within the Competition.

Categories of personal data processed — general/other personal data:

IP address;

- cookie files;

- device identifier;

- social network account data (name/nickname, user identifier (user ID), profile photo — upon authorization via social networks);

- *telephone number (upon authorization via a social network, if provided by the social network);*

- *email address (upon authorization via a social network, if provided by the social network);*

- voting record (which nominee the vote was cast for);

- date and time of voting.

Data subjects:

Website users participating in public voting.

Method of processing personal data:

Personal data are processed with and without the use of automation tools, by a mixed method. In information systems using automation tools, personal data may be transmitted by the following means: over the legal entity’s internal network; over the Internet. The following actions are performed in processing personal data: collection, recording, systematization, storage, use, transfer (provision, access), blocking, deletion and destruction of personal data.

Automated processing includes: collection of data through the voting form hosted on the FormDesigner platform and accessible from a Website page, user authorization through the VKontakte social network, filtering by IP address and device identifier, vote counting, and application of a system for protection against unfair practices (hereinafter — anti-fraud filters).

Non-automated processing includes: manual moderation of suspicious activity and verification of voting results by authorized employees.

Only authorized employees of the Organizer responsible for the technical support of voting (managing the voting form through the administrative panel of the FormDesigner platform, monitoring voting results, checking suspicious activity) have access to the personal data.

Transfer of personal data:

Personal data are transferred to third parties — service providers that ensure the technical operation of public voting and protection against vote manipulation: Individual Entrepreneur V. E. Rymarchuk (FormDesigner platform), VK LLC (VKontakte social network). In respect of VK LLC, the account data are transferred by the user independently when authorizing through the social network. The full list of third parties, the categories of data transferred and the purposes of transfer are set out in the section “Transfer of Personal Data to Third Parties” of this Policy. The transferred data are processed in the territory of the Russian Federation.

Period of processing and storage of data:

Personal data are processed from the time the user ticks the checkbox in the voting form until public voting is completed and the results are tallied.

After voting ends, personal data are stored for 30 (thirty) days after the Competition results are announced for the purpose of resolving possible claims regarding the voting results, after which they are subject to destruction, except where retention of the data is necessary in connection with claims received, lawsuits or other lawful grounds. In such cases, the data are stored until the relevant dispute is resolved or the period established by law expires, after which they are subject to destruction.

The storage period for personal data transferred to third parties is determined by agreements between the Operator and the relevant service providers, taking into account the periods specified in this section. If consent to personal data processing is withdrawn or the purposes of processing are achieved, the Operator notifies third parties of the need to stop processing and destroy the transferred data. Third parties are obliged to take the actions to stop processing and destroy data that are required by Federal Law of 27.07.2006 No. 152-FZ “On Personal Data” and by their agreements with the Operator.

Procedure for destruction of personal data:

Personal data are destroyed automatically by deleting the relevant records from the Organizer’s information systems (voting database, server logs, anti-fraud system logs, cookie files, and records reviewed during manual moderation) upon expiry of the storage period established in this section. The fact of destruction is confirmed in writing by authorized employees of the Organizer.

Legal basis for processing personal data:

Personal data are processed with the consent of the data subject to the processing of their personal data (Clause 1 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ “On Personal Data”).

Specifics:

- Consent is given by ticking the checkbox in the voting form, which contains the text of the consent. Voting is not possible without ticking the checkbox — consent is a mandatory condition for participating in public voting.
- Voting results (aggregated data — the number of votes for each nominee) may be published openly without being linked to the personal data of the individual voter.

4.11. Purpose of personal data processing:

Receipt and consideration of partnership applications received through the “Become a Partner” feedback form, including the preparation of proposals on forms of cooperation and terms of interaction.

Categories of personal data processed — general/other personal data:

Full name; telephone number; email address; company (organization) name; comment (information about cooperation provided by the user in free form).

Data subjects:

User (an individual who completes the “Become a Partner” form on the website).

Method of processing personal data:

Personal data are processed by the following methods: in information systems using automation tools; without the use of automation tools, on paper media; mixed processing.

In information systems using automation tools, personal data may be transmitted by the following means: over the legal entity’s internal network; over the Internet.

The following actions are performed in processing personal data: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (provision, access), blocking, deletion and destruction of personal data.

Period of processing and storage of data:

Personal data are processed until the purpose of processing is achieved — a decision on the application is made (conclusion of a partnership agreement or a reasoned refusal) — or until the data subject withdraws consent to personal data processing, or in other cases provided for by the legislation of the Russian Federation.

After a decision on the application is made, personal data are stored for 1 (one) year for the purpose of a possible resumption of partnership correspondence, after which they are subject to destruction, except in cases provided for by the legislation of the Russian Federation.

If the data subject withdraws consent to processing, personal data are subject to destruction within a period not exceeding 30 (thirty) days from the date the withdrawal is received, unless otherwise provided by the legislation of the Russian Federation.

Procedure for destruction of personal data:

Personal data are destroyed by deleting the relevant records from the Operator’s information systems and databases and by physically destroying paper documents (if any) in ways that prevent third parties from recovering the information. Destruction is documented by authorized employees of the Operator.

Legal basis for processing personal data:

- Personal data are processed with the consent of the data subject to the processing of their personal data (Clause 1 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ “On Personal Data”).

4.12. Purpose of personal data processing:

Organization of the work of the Competition Jury.

Categories of personal data processed — general/other personal data:

Full name; telephone number; email address; position, place of work; expert evaluation (scores, comments by nomination); date and time of voting/evaluation.

Data subjects:

Individuals — Jury members of the Competition.

Method of processing personal data:

Personal data are processed by the following methods: in information systems using automation tools; without the use of automation tools, on paper media; mixed processing.

In information systems using automation tools, personal data may be transmitted by the following means: over the legal entity's internal network; over the Internet.

The following actions are performed in processing personal data: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (provision, access), blocking, deletion and destruction of personal data.

Period of processing and storage of data:

Personal data are processed until the purpose of processing is achieved — completion of the Jury's work and finalization of the Competition results — or until the data subject withdraws consent to personal data processing, or in other cases provided for by the legislation of the Russian Federation.

After the Jury's work is completed, personal data (contact details, expert evaluations) are stored for 1 (one) year for the purpose of resolving possible claims regarding the Competition results, after which they are subject to destruction, except in cases provided for by the legislation of the Russian Federation.

If the data subject withdraws consent to processing, personal data are subject to destruction within a period not exceeding 30 (thirty) days from the date the withdrawal is received, unless otherwise provided by the legislation of the Russian Federation.

Procedure for destruction of personal data:

Personal data are destroyed by deleting the relevant records from the Organizer's information systems and by destroying paper and electronic documents containing personal data upon expiry of the storage period established in this section. The fact of destruction is confirmed in writing by authorized employees of the Organizer.

Legal basis for processing personal data:

- Personal data are processed with the consent of the data subject to the processing of their personal data (Clause 1 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ "On Personal Data").

4.13. Purpose of personal data processing:

Publication of information about the composition of the jury on the Competition website.

Categories of personal data processed — general/other personal data:

Full name; position, place of work; photograph (image).

Note: The photograph (image) is processed solely for the purposes specified in Clause 4.13. Individuals are not identified by biometric characteristics.

Data subjects:

Individuals — Jury members of the Competition.

Method of processing personal data:

Personal data are processed with and without the use of automation tools, by a mixed method. In information systems using automation tools, personal data may be transmitted by the following means: over the legal entity's internal network; over the Internet.

The following actions are performed in processing personal data: collection, recording, systematization, accumulation, storage, clarification, retrieval, use, transfer (dissemination, provision, access), blocking, deletion and destruction of personal data; including posting (publication) on the Internet — on the Award website.

The specific addresses of the information resources on which the data are posted are determined in the data subject's consent to dissemination.

The list of categories of personal data permitted for dissemination, as well as the list of prohibitions and conditions on their processing, is established by the data subject independently when giving consent to dissemination.

Period of processing and storage of data:

Personal data are processed until the purpose of processing is achieved — posting of information about the composition of the jury on the Competition website — or until the data subject withdraws consent to personal data processing, or in other cases provided for by the legislation of the Russian Federation.

After the information is posted on the website, personal data are stored and displayed on the website for the duration of the Competition and for 1 (one) year after its end for the purpose of archiving Competition materials, after which they are subject to destruction, except in cases provided for by the legislation of the Russian Federation.

Upon expiry of the specified storage periods or upon receipt of a withdrawal of consent to processing, the Operator stops processing the personal data and ensures their destruction within a period not exceeding 30 (thirty) days, unless a different period is provided for by federal law. The fact of destruction is confirmed in writing by authorized employees of the Organizer.

Upon receipt of a demand to stop the dissemination of personal data (including a demand to remove information from the website before the general storage period expires), the operator stops publication from the date such demand is received. The data themselves continue to be stored by the Operator in a restricted mode, without public access, until the established archiving period or other periods provided for by the legislation of the Russian Federation expire.

In performing its obligation to stop dissemination, the Operator deletes the personal data from all information resources under its management. The Operator is not liable for the further dissemination of personal data by third parties if such data were copied or disseminated by them independently before the Operator lawfully deleted them.

Legal basis for processing personal data:

- Consent of the data subject to the processing of their personal data (Clause 1 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ “On Personal Data” (hereinafter the Law), including consent to the dissemination of personal data obtained in accordance with Article 10.1 of that Law.

4.14. Purpose of personal data processing:

Collection and analysis of Competition website visit statistics using cookie files in order to improve the user experience and optimize the operation of the website.

Categories of personal data processed:

- Technical cookie files (do not require consent): session identifier, user settings (language, display parameters), data for the correct operation of the website, support for the operation of feedback forms, session persistence.
- Analytics data (require consent): IP address, information about the browser and device type, pages viewed, referral sources, time on the website and actions in the interface, session recordings using the Webvisor technology.

Data subjects:

Competition website users — individuals who visit the website and interact with its content.

Method of processing personal data:

Processing is carried out using automation tools. Actions: collection, recording, systematization, storage, use, transfer (provision, access), blocking, deletion, destruction.

Automated processing includes: setting cookie files, collecting data through the Yandex.Metrica counter, recording sessions through the Webvisor technology with masking of personal data input fields in feedback and voting forms, and generating summary statistics.

Period of processing and storage of data:

- Technical cookie files: stored in the user’s browser in accordance with their default validity period (deleted when the browser is closed or when the period expires).
- Analytics data: The Organizer stops using the data and removes access to them in its information systems within a period not exceeding 30 (thirty) days from the date a demand to withdraw consent is received. With respect to data stored on the servers of YANDEX LLC, the Organizer sends a request to delete the data in accordance with the technical capabilities of the service. The fact that processing has stopped and the data have been deleted from the Organizer’s systems is recorded in an internal report.

Legal basis for processing:

- For technical cookie files: Clause 7 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ “On Personal Data” (processing is necessary to pursue the legitimate interests of the operator — ensuring the correct functioning of the website);
- For analytics data: Clause 1 of Part 1 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ “On Personal Data” (processing on the basis of the data subject’s voluntary consent).

Procedure for obtaining consent:

Consent is given by clicking “Accept” in the cookie banner. The user may click “Decline”, in which case the website continues to function in full and analytics scripts are not loaded. Consent may be withdrawn through the cookie settings on the website or the browser settings.

Transfer of personal data:

Data are transferred to YANDEX LLC (Yandex.Metrica, Webvisor) for processing for analytics

purposes. Processing is carried out in the territory of the Russian Federation. YANDEX LLC processes the data in accordance with its Privacy Policy.
Yandex.Webmaster is used for website indexing and does not collect personal data.

4.15. Transfer of Personal Data to Third Parties

The Operator transfers personal data to third parties on the basis of the Operator's instruction in accordance with Part 3 of Article 6 of Federal Law of 27.07.2006 No. 152-FZ "On Personal Data". Third parties process the transferred data solely on the Operator's instruction and do not use them for their own purposes. Processing is carried out in the territory of the Russian Federation.

An exception is the transfer of data made by the data subject independently to a third party acting as an independent operator (in particular, authorization through the VKontakte social network), as well as the processing of cookie files set by a third party when forms are technically loaded on the Website (in particular, by the FormDesigner platform). In such cases, the Operator does not transfer personal data; instead, the data subject provides them to the third party independently, or the third party collects data through its own technical means as an independent operator.

4.15.1. 1C-Bitrix LLC (Bitrix24 platform)

Full name: Limited Liability Company "1C-Bitrix"

INN 7717586110

Address: 109544, Moscow, Entuziastov Boulevard, 2, 13th floor, premises 8–19

Purpose: Storage and management of participant data in a customer relationship management system; automation of communications with participants (email mailings and SMS messages).

Categories of personal data: the personal data specified in Clause 4.1 of this Policy.

Legal basis: the Operator's instruction (Part 3 of Article 6 of Law No. 152-FZ). Basis for transfer — the data subject's consent (Clause 1 of Part 1 of Article 6 of Law No. 152-FZ).

Specifics: telephony and call recording are not enabled. Automated actions (email mailings and SMS messages) are performed as part of the processing of Competition participants' applications.

Link to the Privacy Policy: <https://www.1c-bitrix.ru/about/privacy.php>

4.15.2. YANDEX LLC (Yandex.Metrica, Webvisor)

Full name: Limited Liability Company "YANDEX"

INN 7736207543

Address: 119021, Russia, Moscow, Lva Tolstogo Street, 16

Purpose: collection and analysis of Competition website visit statistics, recording of user sessions.

Categories of personal data: the personal data specified in Clause 4.14 of this Policy.

Legal basis: the Operator's instruction (Part 3 of Article 6 of Law No. 152-FZ). Basis for transfer — the data subject's consent (Clause 1 of Part 1 of Article 6 of Law No. 152-FZ).

Link to the Privacy Policy: <https://yandex.ru/legal/confidential/ru/>

4.15.3. Individual Entrepreneur V. E. Rymarchuk (FormDesigner platform)

Full name: Individual Entrepreneur Vladimir Evgenyevich Rymarchuk

INN 614345105580

Address: Voronezh Oblast, Novousmanskyy District, settlement of Otradnoye, Rubinovaya Street, 14/103

Purpose: technical support of forms for collecting participation applications and holding public voting; storage and processing of data of participants and voters.

Categories of personal data: the personal data specified in Clauses 4.1 and 4.10 of this Policy.

Legal basis: the Operator's instruction (Part 3 of Article 6 of Law No. 152-FZ). Basis for transfer — the data subject's consent (Clause 1 of Part 1 of Article 6 of Law No. 152-FZ).

Cookie policy: <https://formdesigner.ru/cookie.html>

Specifics: the voting and application forms are technically loaded from the domain of the FormDesigner platform (formdesigner.ru), not from the domain of the Competition website. FormDesigner is an independent operator with respect to the cookie files set when these forms are loaded and obtains consent to their use through its own cookie banner.

4.15.4. Unisender SMART LLC (UniSender platform)

Full name: Limited Liability Company "Unisender Smart"

INN 9731091240

Address: 127015, Moscow, inner-city municipal district Butyrsky, Bolshaya Novodmitrovskaya Street, 23, floor/premises 2/46

Purpose: sending email mailings and SMS messages to Competition participants and subscribers.

Categories of personal data: the personal data specified in Clause 4.5 of this Policy.

Legal basis: the Operator's instruction (Part 3 of Article 6 of Law No. 152-FZ). Basis for transfer — the data subject's consent (Clause 1 of Part 1 of Article 6 of Law No. 152-FZ).

Link to the Privacy Policy: <https://www.unisender.com/ru/privacy-notice/>

4.15.5. VK LLC (VKontakte social network)

Full name: Limited Liability Company "VK"

INN 7743001840

Address: 125167, Moscow, Leningradsky Prospekt, 39, bldg. 79

Purpose: user authorization for voting through the social network

Categories of personal data: name/nickname, user identifier (user ID), profile photo, *telephone number and email address — if provided by the social network upon authorization.*

Legal basis: the transfer is made directly by the user upon authorization through the social network. The user independently decides whether to authorize and transfer data. VK LLC processes the transferred data as an independent operator in accordance with its own privacy policy.

Link to the Privacy Policy: <https://id.vk.ru/privacy>

4.16. Personal data are processed and stored exclusively in the territory of the Russian Federation.

4.16.1. The servers (databases) used to store personal data are located in the territory of the Russian Federation, which ensures compliance with the requirements of Russian legislation on the localization of personal data of Russian citizens.

4.16.2. The collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval and any other processing of personal data of citizens of the Russian Federation using databases located outside the territory of the Russian Federation is prohibited.

4.17. Cross-Border Transfer of Personal Data

4.17.1. General provisions

The Organizer collects the personal data of Competition participants, including citizens of foreign states, through the official Competition website, whose servers are located in the territory of the Russian Federation. The mere fact that a foreign citizen submits an application through the Competition website is not a cross-border transfer of personal data, since the data are received by servers located in the territory of the Russian Federation.

Cross-border transfer of personal data through the services and platforms specified in Section 4.15 of this Policy (FormDesigner, Bitrix24, UniSender, Yandex.Metrica, the VKontakte social network) is not carried out — these services are hosted on servers located in the territory of the Russian Federation.

4.17.2. Cases of cross-border transfer

The Organizer carries out cross-border transfer of personal data solely for the purpose of transferring a cash prize to a winner (prizewinner) of the Competition who is a foreign citizen, to bank details provided in an international format (SWIFT/IBAN). The following data are transferred: full name (if any), citizenship, and the recipient's bank account details.

Cross-border transfer is made to the territory of the foreign states whose citizens are winners of cash nominations, except for states included in the list of foreign states and territories committing unfriendly actions against the Russian Federation (approved by Order of the Government of the Russian Federation of 05.03.2022 No. 430-r), as well as states subject to blocking sanctions. Cash prizes are not paid to citizens of those states, in accordance with Clause 3.1 of the Regulations on the Award.

4.17.3. Legal regime and security

The Organizer carries out cross-border transfer of personal data in accordance with the requirements of Article 12 of Federal Law of 27.07.2006 No. 152-FZ "On Personal Data" and ensures the protection of the transferred personal data in accordance with the legislation of the Russian Federation.

If the state into whose territory the cross-border transfer is made is included in the list of foreign states ensuring adequate protection of the rights of data subjects, approved by Order of Roskomnadzor of 05.08.2022 No. 128, the cross-border transfer is made after a notification is sent to Roskomnadzor in accordance with Part 10 of Article 12 of Federal Law of 27.07.2006 No. 152-FZ.

If the state into whose territory the cross-border transfer is made is not included in the specified list, the cross-border transfer is made in the manner provided for by Part 11 of Article 12 of Federal Law of 27.07.2006 No. 152-FZ.

4.17.4. Notification and consent.

The Organizer notifies Roskomnadzor of its intention to carry out cross-border transfer of personal data before such transfer begins, separately from the notification of personal data processing, in the manner provided for by Parts 3–4 of Article 12 of Federal Law of 27.07.2006 No. 152-FZ.

The legal basis for cross-border transfer is the data subject's consent, executed as a separate consent obtained from participants who are non-residents of the Russian Federation and claim a cash prize, in accordance with Clause 6.2.1 of the Regulations on the Award. This consent contains information on the purposes, the scope of the data transferred, the states into whose territory the transfer is made, and the period for which the consent is valid.

4.17.5. Liability.

The Organizer is not liable for the actions of foreign banking organizations and other third parties that process data in the course of executing a banking operation to transfer funds, provided that the Organizer has taken all measures within its control to ensure the security of the data transfer in accordance with the legislation of the Russian Federation.

5. Personal Data Protection Measures

5.1. The Operator implements a set of organizational and technical measures aimed at preventing unauthorized access to, destruction, modification, blocking of, or other unlawful interference with the personal data of data subjects.

5.2. Organizational protection measures:

- **Employee access:** access to personal data is granted only to employees whose job duties require the processing of such data.
- **Contractual obligations:** employees undertake to maintain confidentiality and bear liability for violations as provided for by internal documents and the legislation of the Russian Federation.
- **Control procedures:** activities to monitor compliance with internal procedures and instructions on the processing of personal data are carried out regularly.
- **Employee training:** employees undergo mandatory training on the processing and protection of personal data.

5.3. Technical protection measures:

- **Data encryption:** cryptographic protection is applied to the storage and transmission of personal data.
- **Secure connection protocols:** modern encryption protocols (SSL/TLS) are used to transmit data over the Internet, protecting the information transmitted.

- **Access control:** information resources are protected by a password system and two-factor authentication mechanisms.
- Accounting for computer storage media containing personal data;
- **Antivirus protection:** modern software is used to prevent infection by viruses and malicious programs.
- **Security monitoring:** the state of the information infrastructure is checked regularly and possible threats are promptly eliminated.
- **Backup:** a system of regular backup of personal data has been implemented to restore lost information.

5.4. Control of the physical environment:

- **Physical access:** access to personal data storage locations and equipment is restricted by special security measures and access control.
- **Archive storage:** archive materials and duplicate documentation are kept in secure premises with limited possibilities for unauthorized persons to enter.

5.5. The Operator makes maximum efforts to maintain a high level of security of data subjects' personal data. Alongside technical protection tools, the effectiveness of the security measures applied is assessed regularly and existing personal data processing procedures are optimized.

6. Operator's Obligations for the Storage and Protection of the Personal Data of Data Subjects

6.1. The Operator ensures, at its own expense, the protection of data subjects' personal data against unlawful use or loss in the manner established by the legislation of the Russian Federation.

6.2. The Operator takes the measures necessary and sufficient to perform the obligations established by Federal Law No. 152-FZ "On Personal Data", other federal laws and regulatory legal acts of the Russian Federation. The Operator independently determines the composition and list of measures necessary and sufficient to ensure performance of the obligations provided for by those legislative acts.

Such measures include, in particular:

- appointment by the Operator of a person responsible for organizing the processing of personal data;
- development of internal regulatory documents governing the purposes, grounds, types and methods of processing personal data, their storage periods, and the procedure for destroying personal data when the purposes of processing are achieved or other lawful grounds arise;
- implementation of legal, organizational and technical measures to ensure the security of personal data;
- internal control and/or audit of the Operator's compliance with the provisions of Federal Law No. 152-FZ and the regulatory legal acts adopted in accordance with it, and with information security standards;
- assessment of the risks and possible negative consequences for data subjects arising from violations of personal data legislation;
- informing the organization's employees who perform operations involving the processing of personal data about the requirements of Russian legislation on personal data protection and the organization's rules and procedures regarding the processing of personal data, and organizing regular professional development for those employees.

6.3. The Operator publishes this Policy on the official Website and ensures that its text is available to data subjects.

6.4. The transfer of data subjects' personal data is carried out solely within the framework of this Policy and in accordance with the legislation of the Russian Federation.

6.5. Personal data of data subjects are provided to third parties only to the extent necessary for them to perform their functions, strictly in accordance with the purposes established by this Policy and Russian legislation.

6.6. The Operator is not entitled to collect and process personal data of data subjects regarding their political views, religious affiliation and other worldview position, or information about their private life. Where there are circumstances directly affecting the activities of the data subject, the Operator may request personal data concerning personal circumstances only with their voluntary written consent.

6.7. The processing of personal data of data subjects relating to their participation in public activities or work in trade unions is prohibited, except in cases specifically provided for by the legislation of the Russian Federation.

6.8. The Operator has the right to provide data subjects' personal data for marketing or commercial purposes only if their prior consent has been obtained.

6.9. If a data subject gives permission for the dissemination of their personal information, such consent is executed as a separate document. The Operator guarantees the data subject the ability to independently determine the list of personal data to be disclosed.

6.10. A data subject has the right to establish additional restrictions and special conditions for the transfer of their personal data to an indefinite number of third parties, and to exclude specific methods of processing of personal data by third parties. These restrictions and conditions must be taken into account by the Operator and may not be ignored even when personal data are transferred to other organizations, except in cases established by the legislation of the Russian Federation.

6.11. The Operator is obliged to provide each data subject with free access to all necessary information about their personal data, including the opportunity to review copies of records containing their personal information, except in situations provided for by the legislation of the Russian Federation.

6.12. At the request of a data subject, the Operator provides comprehensive information on the content, conditions and methods of processing of the data subject's personal data.

6.13. If a data subject refuses to provide personal data, the Operator notifies the data subject of the possible consequences of such a decision.

6.14. The Operator stops processing personal data in the following cases:

- the fact of their unlawful processing has been identified;
- the purpose of their processing has been achieved;
- the data subject's consent to the processing of the data has expired or been withdrawn, where under the Personal Data Law the processing of such data is permitted only with consent.

6.15. Upon achievement of the purposes of processing personal data, and also if the data subject withdraws consent to their processing, the Operator stops processing the data, unless:

- otherwise provided by a contract to which the data subject is a party, beneficiary or guarantor;
- the Operator is not entitled to carry out processing without the data subject's consent on the grounds provided for by the Law on Personal Data or other federal laws;
- otherwise provided by another agreement between the Operator and the data subject.

6.16. If a data subject applies to the Operator with a demand to stop processing personal data, processing is stopped within a period not exceeding 10 business days from the date the Operator receives the relevant demand, except in cases provided for by the Personal Data Law. This period may be extended, but by no more than five business days. To do so, the Operator must send the data subject a reasoned notice stating the reasons for the extension (Part 5.1 of Article 21 of Law No. 152-FZ).

7. Rights of the Data Subject to the Protection of Their Personal Data

7.1. A data subject has the right to protect their interests and legal rights in the course of the Operator's processing of their personal data. The main rights include:

- Receiving complete and reliable information about their own personal data, the methods of processing, the storage periods, and the data transferred to third parties;
- Appointing a representative to protect their rights and interests in matters of personal data processing;
- Requiring the elimination of errors, the correction of inaccurate or incomplete personal data, and the termination of data processing that violates the applicable legislation of the Russian Federation and this Policy;
- Filing a reasoned written objection if the Operator refuses to eliminate errors or to stop processing incorrect data;
- Demanding that the Operator notify all parties to whom erroneous or outdated personal data were previously provided of the elimination of errors or changes made.

7.2. If a data subject believes that the Operator has violated the rules for processing their personal data or has otherwise infringed their rights and freedoms established by Federal Law No. 152-FZ “On Personal Data”, they have the right to lodge a complaint:

- with the authorized federal executive body for the protection of the rights of data subjects (Roskomnadzor);
- with a court, for resolution of the dispute in civil proceedings.

7.3. All inquiries from data subjects are considered by the Operator promptly and in good faith. A response is sent to the applicant within the periods provided for by the applicable legislation of the Russian Federation.

8. Consent to the Processing of Personal Data

8.1. General provisions

8.1.1. Data subjects who have reached the age of 18, by using the Website and providing their personal data through feedback forms, applications or in any similar way, confirm that they:

- Have read this Personal Data Processing Policy.
- Voluntarily and knowingly give their consent to the Operator’s processing of their personal data.

8.1.2. Ticking a checkbox in the relevant field of a form on the Website, or performing an equivalent action, constitutes the giving of consent to the processing of personal data.

8.1.3. The absence of a positive mark (checkbox) is interpreted as the data subject’s refusal to give consent to the processing of personal data, which makes further interaction with the user in terms of data processing impossible.

8.2. Procedure for Withdrawing Consent to the Processing of Personal Data

8.2.1. A data subject has the right to withdraw their consent to the processing of personal data at any time by sending the Operator a request in one of the following ways:

- By sending an email to: vetaward@lintega.ru

- By registered mail with return receipt to the Operator’s registered address.

8.2.2. A request to withdraw consent must contain:

- the data subject’s surname, given name and patronymic (if any);
- the email address or telephone number provided upon registration on the Website;
- an indication of the consent being withdrawn (for example, consent to data processing for the purpose of participating in the Competition, or consent to mailings);
- the data subject’s signature (for an electronic request — the full name stated in the text of the email; for a paper request — a handwritten signature).

8.2.3. Having considered a withdrawal-of-consent request received, the Operator stops processing and destroys the personal data within a period not exceeding 30 days from receipt of the request, except where continued processing is provided for by Part 5 of Article 21 of Federal Law of 27.07.2006 No. 152-FZ.

8.2.4. The Operator notifies the data subject of the decision taken within a reasonable time after the request has been considered.

9. Procedure for Destruction and Blocking of Personal Data

9.1. If facts of unlawful or improper use of personal data are identified, the Operator immediately blocks such data until the circumstances of the incident are clarified.

9.2. The validity of the blocking is verified by the Operator within **7 business days** of the detection of signs of a violation.

9.3. If the unlawfulness of processing is confirmed, the Operator stops processing personal data and deletes them in full within **3 business days**, unless otherwise provided by the legislation of the Russian Federation.

9.4. If inaccurate or incorrect personal data are identified, the Operator corrects them on the basis of new information or official documents received from the data subject within a period not exceeding **7 business days** from receipt of the confirmed information.

9.5. If it is not possible to correct the error within the specified periods, the Operator blocks the data until the discrepancies are eliminated.

9.6. The Operator notifies the data subject of the measures taken to clarify, block or destroy data within a reasonable time after the verification is completed.

9.7. If the purposes of processing personal data are achieved, the Operator stops processing and destroys the personal data within **30 calendar days** from the date this fact is identified.

9.8. If consent to the processing of personal data is withdrawn and there are no other legal grounds for continued processing provided for by Parts 2–11 of Article 6, Part 2 of Article 10 and Part 2 of Article 11 of Federal Law of 27.07.2006 No. 152-FZ, the Operator stops processing and destroys the personal data within a period not exceeding 30 days from receipt of the withdrawal of consent.

9.9. If it is technically impossible to destroy the data immediately, the Operator temporarily restricts access to such data and destroys them within no more than **6 months** from the start of blocking.

9.10. Destruction is carried out by the following methods:

9.10.1. Physical destruction:

- Paper media containing personal data are destroyed by shredding or burning.
- Electronic media (disks, flash drives, etc.) are destroyed by physical destruction or by formatting using methods that make it impossible to recover the data.

9.10.2. Logical destruction:

- Deletion of electronic files containing personal data followed by overwriting of memory sectors to make it impossible to recover the information.

9.10.3. Destruction of data on the Website and in the Operator's databases:

- Deletion of user accounts (participants, voters) from the Website authorization system;
- Deletion of records containing personal data from the Website databases;
- Deletion of uploaded files (photographs, video applications, documents) from the Website server.

9.10.4. Destruction of data in third-party services:

- Deletion of personal data from the third-party services specified in this Policy (including the application intake platform, the voting service, the mailing service and analytics systems) through the control panel of the relevant service or by sending a request to the service provider;
- If a third-party service does not allow data to be deleted immediately, the Operator sends the provider a written demand to destroy the transferred personal data within a period not exceeding 30 days.

9.10.5. Deletion of cookie files and technical data:

- Clearing of server logs (log files) containing IP addresses and other technical data of users;

- Deletion of cookie files through expiry of their validity period or forced deletion through the Website settings.

9.11. To confirm the destruction of data, the Operator prepares the following specialized documents:

- Report on the destruction of paper media — includes the details of the employee responsible for the operation, the date of destruction and a list of the materials destroyed;
- Report on the destruction of data in information systems and databases — includes the name of the system, a list of deleted records or accounts, the date and method of deletion, and the full name of the responsible employee;
- Electronic file deletion log — includes a list of destroyed files, the method of deletion (with or without memory overwriting), the date and full name of the responsible employee, with an attached report from the information system event log;
- Notice of destruction of data in third-party services — confirmation that a request to delete data was sent to the service provider, or a screenshot/export from the service's control panel confirming deletion, stating the date and the full name of the responsible employee.

9.12. Data that are retained because their further use is necessary under a contract or legislation remain blocked until the established storage period expires. Blocking is carried out by restricting access to records without deleting them.

10. Confidentiality Guarantees and Liability for Violating the Rules Governing the Processing and Protection of Personal Data

10.1. Personal data received by the Operator are confidential information and may not be disclosed to third parties, except in cases provided for by the legislation of the Russian Federation or by contracts agreed by the parties. Access to personal data is limited to those Operator officials who are directly involved in performing their assigned functional duties. Personal data are processed and stored using a set of organizational and technical measures that ensure their security and protection against unauthorized access, modification, blocking, dissemination or destruction.

10.2. Operator employees who have access to personal data are obliged to maintain confidentiality and to protect the data against unauthorized access, disclosure, modification or dissemination. Violators are held liable in accordance with the Operator's internal rules and the legislation of the Russian Federation.

10.3. Persons who violate the rules governing the receipt, processing and protection of personal data are held liable in various forms:

- disciplinary liability is established by the Labor Code of the Russian Federation and the Operator's internal documents;
- financial (material) liability arises where damage is caused to the owner of the personal data and is governed by civil legislation;
- administrative liability arises where the data processing procedure is violated and is determined by the Code of the Russian Federation on Administrative Offenses;
- criminal liability is established by the Criminal Code of the Russian Federation in the event of serious violations and crimes in the field of personal data processing.

10.4. Any damage caused by a violation of the rights of the owner of personal data is subject to compensation in the amount established by the legislation of the Russian Federation. Compensation for non-pecuniary (moral) damage is made regardless of compensation for material damage and losses.

10.5. The Operator takes all necessary measures to prevent and stop attempts at unauthorized access to personal data, including implementing technological and administrative measures to raise the level of data security and protection.

10.6. Upon detecting violations related to the protection of personal data, the Operator promptly conducts an internal investigation, identifies the cause of the incident and holds the persons at fault liable in the established manner.

10.7. Data subjects have the right to apply to competent state authorities (the FSB, the Prosecutor's Office, Roskomnadzor) to bring violators to liability in the event of intentional or negligent actions resulting in the loss or compromise of data.

11. Final Provisions

11.1. This Policy enters into force upon its publication on the Operator's official Website and remains in effect indefinitely until replaced by a new version.

11.2. Amendments and additions to the Policy are made by the Operator as necessary and enter into force upon their publication on the Operator's Website.

11.3. The Policy is available for free review by any interested person, without charge or other restrictions.

11.4. Each data subject who provides personal data to the Operator is obliged to read the text of the Policy personally before taking actions that imply data processing.

11.5. Data subjects are deemed to have read the current version of the Policy if they have not expressed objections after their first authorization or use of a service involving the processing of personal data.

11.6. The Policy is posted on the Operator's official Website and is accessible around the clock without interruption.

11.7. Oversight of compliance with this Policy is assigned to an official appointed by the head of the Operator, who monitors whether data processing complies with the requirements of the legislation of the Russian Federation.

11.8. Operator's contact information:

LINTEGA LLC, INN 9717194290, OGRN 1267700234757

Address: 129626, Moscow, Mira Avenue, 102, bldg. 12, premises 3n/5

Email: INFO@LINTEGA.RU , Telephone: +79222225369

General Director Yu. V. Makeeva.

9 September 2026

