

**Privacy Policy
in Personal Data Processing**

Moscow

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1. Terms and Definitions

- 1.1. **Automated Personal Data Processing** means the processing of personal data with the help of computer equipment;
- 1.2. **Personal Data Blocking** means a temporary suspension of personal data processing (unless such processing is required to clarify the personal data);
- 1.3. **Personal Data Information System** means a complex of personal data stored in personal databases and information technologies and equipment used to process such data;
- 1.4. **Personal Data Confidentiality** means a mandatory requirement for the Operator or any other person who has obtained access to personal data to prevent data dissemination without the consent of the subject of personal data or other legal grounds.
- 1.5. **Personal Data Anonymization** means actions which prevent identification of personal data as belonging to a certain User or another subject of personal data without use of additional information;
- 1.6. **Personal Data Processing** means any action (operation) or a set of actions (operations) in regard to personal data using automation tools or without them, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction of personal data;
- 1.7. **Operator** means Meeting Point JSC that independently or together with other entities or persons arranges and (or) performs the processing of personal data and determines the purposes of personal data processing, contents of personal data to be processed, actions (operations) performed in regard to personal data;
- 1.8. **Personal Data** means any information directly or indirectly related to an identified or identifiable User of <https://point2meet.ru> Website
- 1.9. **User** means any visitor to <https://point2meet.ru> Website
- 1.10. **Personal Data Provision** means actions aimed at the disclosure of personal data to a certain person or entity or a certain group of persons or entities;
- 1.11. **Personal Data Dissemination** means actions aimed at disclosing personal data to the public at large (transfer of personal data) or at making personal data available for study to the public at large, including disclosure of personal data in the mass media, their publication in data telecommunications networks or granting access to personal data in any other way;
- 1.5. **Website** means <https://point2meet.ru> website. **Website** means a set of graphics and information materials, as well as computer programs and databases that ensure their availability on the Internet at the network address <https://point2meet.ru>;

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- 1.12. **Cross-Border Transfer of Personal Data** means the transfer of personal data to the territory of a foreign country, foreign authority, foreign natural person or foreign legal entity;
- 1.13. **Destruction of Personal Data** means any actions as a result of which personal data is irrevocably destroyed rendering it impossible to restore the content of personal data in a personal data information system, and (or) resulting in destruction of physical storages in which personal data is stored.
- 1.14. Cookies mean a small piece of data sent by a web server and stored on a user's computer, which a web client or web browser sends to the web server in an HTTP request each time it tries to open a page on the respective site.
- 1.15. IP Address means a unique network node address in an IP-based computer network.

2. General

- 2.1. This Personal Data Processing Policy (hereinafter – the “Policy”) is made in accordance with the requirements of Federal Law No. 152-FZ of 27 July 2006 *On Personal Data* and establishes the Operator's personal data processing procedure and protection measures.
- 2.2. The Operator sets as its most important goal and condition for its activities the observance of the rights and freedoms of people and citizens during the processing of personal data, including the protection of privacy, personal and family secrecy rights.
- 2.3. This Policy shall apply to all information that the Operator may receive in regard to Website visitors.
- 2.4. Using the Website by the User means accepting this Privacy Policy and the terms of the User's personal data processing.
- 2.5. The User must stop using the Website in case of disagreement with the terms of the Privacy Policy.
- 2.6. This Privacy Policy applies only to the <https://point2meet.ru> Website. The Operator is not responsible for third-party websites to which the User may go via the links on the Website.
- 2.7. The Website administration does not verify the reliability of the Website User's personal data.

3. Subject Matter of the Privacy Policy

- 3.1. This Privacy Policy sets out the Operator's obligations regarding the non-disclosure and protection of personal data that the User provides when filling out the forms on the Website <https://point2meet.ru> at the Operator's request.
- 3.2. The personal data permitted to process under this Privacy Policy is provided by the User by filling out the registration form at <https://point2meet.ru> and includes the following information:

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- Last name, first name, patronymic;
 - E-mail address;
 - Phone numbers.
- 3.3. The Website also collects and processes anonymized data on visitors (including cookies) using Internet statistics services (Yandex Metrics, Google Analytics, etc.).
- 3.4. The Website protects the Data automatically transferred when advertisements are viewed and when pages with the installed statistical script system (Yandex) are visited;
- 3.5. Disabling cookies may prevent access to parts of the Website.
- 3.6. The Website collects statistics about its visitors' IP addresses. This information is used to identify and solve technical problems and for statistical purposes;
- 3.7. Any other personal data not mentioned above (browsers and operating systems, etc.) is subject to safe storage and nondissemination, except as provided for in clauses 6.2 and 6.3 hereof.

4. Purpose of Personal Data Processing

- 4.1. The Operator may use the User's personal data for the purpose of:
- 4.1.1. Identifying the User registered on the Website.
 - 4.1.2. Providing access to the Website's personalized resources to the User.
 - 4.1.3. Arranging feedback with the User, including notification or inquiries concerning the use of the Website, rendering of services, processing of the User's inquiries and requests.
 - 4.1.4. Determining the User's location for security purposes and fraud prevention.
 - 4.1.5. Confirming the reliability and completeness of the User's personal data submitted
 - 4.1.6. Creating the User account upon the User's consent thereto.
 - 4.1.7. Notices to Website Users.
 - 4.1.8. Providing the User with effective technical support in case of Website use problems.
 - 4.1.9. Providing the User with newsletters and other information on behalf of the Operator or on behalf of the partners subject to the User's consent.
 - 4.1.10. Advertising activities with the User's consent.
 - 4.1.11. Providing the User with access to the Operator's partner websites or services for the purposes of receiving products, updates and services.
- 4.2. Anonymized user data collected using Internet statistics services are used to gather information about the Website User activities and to improve the Website quality and content.

5. Legal Grounds for Personal Data Processing

- 5.1. The Operator processes the User's personal data only if it is filled out and/or sent by the Users themselves through special forms on the Website.
- 5.2. The User agrees with this Policy by filling in the appropriate forms and/or sending personal data to the Operator.
- 5.3. The Operator processes the anonymized User Data in case it is allowed in the settings of the User's browser (saving cookies and the use of JavaScript technology are enabled).

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6. Procedure for the collection, storage, transfer or other processing of personal data

- 6.1. The Operator shall guarantee the security of personal data by applying legal, organizational and technical measures to comply fully with the requirements of current personal data protection legislation.
- 6.2. The Operator ensures personal data security and takes all possible measures to prevent unauthorized persons or entities from accessing personal data. The Operator may transfer personal data to third parties, in particular, to courier services and postal organizations.
- 6.3. A user's personal data can be provided to relevant authorities of the Russian Federation only on the basis and according to the procedure established by the laws of the Russian Federation.
- 6.4. Where inaccuracies in personal data are identified, the User may update it himself/herself by sending a notice to the Operator's e-mail welcome@point2meet.ru with the note "Updating personal data".
- 6.5. The term for processing personal data is unlimited. The User may withdraw his/her consent to the processing of personal data at any time by sending a notice to the Operator's e-mail welcome@point2meet.ru with the note "Withdrawal of consent to personal data processing".
- 6.6. The Operator takes the necessary legal, organizational and technical measures to protect the User's personal data from unlawful or accidental access, destruction, alteration, copying, distribution, as well as other third-party illegal actions.
- 6.7. Together with the User, the Operator shall take all necessary measures to prevent losses or other negative effects resulting from the loss or disclosure of the User's personal data.

7. Cross-Border Transfer of Personal Data

- 7.1. Prior to the commencement of the cross-border transfer of personal data, the Operator shall ensure that the foreign country to which the transfer of personal data is intended ensures reliable protection of personal data subjects' rights.
- 7.2. Only if the data subject agrees in writing to the cross-border transfer of his/her personal data and/or the performance of the contract to which the data subject is a party can the cross-border transfer of personal data be performed to the territory of foreign countries that do not meet the above requirements.

8. Obligations of the Parties

- 8.1. The User shall:
- 8.1.1. Provide personal data information needed to use the Website.
- 8.1.2. Update, supplement the personal information provided in the event of changes to that information.
- 8.2. The Operator shall:
- 8.2.1. Use the information obtained only for the purposes specified in clause 4 hereof.
- 8.2.2. Ensure that confidential data is kept in secret, not disclose the User personal data transferred without prior written permission and not sell,

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exchange, publish or otherwise disclose the User personal data transferred, except as stated in clauses 6.2 and 6.3 hereof.

8.2.3. Take precautions to protect the confidentiality of the User personal data according to the procedure commonly used in the existing business conduct to protect such information.

8.2.4. Block personal data relating to the respective User for the period of verification from the time of application or request of the User or his/her legal representative or authorized body on the protection of personal data subjects' rights, in the event of unreliable personal data being disclosed or illegal actions taken.

9. Liabilities of the Parties

9.1. The Operator which has failed to fulfill its obligations shall be liable for losses incurred by the User in connection with the illicit use of personal data in accordance with the laws of the Russian Federation, except in the cases specified in clauses 6.2, 6.3 and 8.2 hereof.

9.2. In case of loss or disclosure of Confidential information, the Website Administrator shall not be liable if such confidential information:

9.2.1. Became known to the public before it was lost or divulged.

9.2.2. Was received from a third party before it was received by the Operator.

9.2.3. Was divulged with the User's consent.

10. Dispute Settlement

10.1. It is compulsory to submit a claim (a written proposal for an amicable dispute settlement) before filing a lawsuit in court for disputes between the User and the Operator.

10.2. The recipient of the claim shall notify the claimant in writing about the results of the claim review within 30 calendar days of receipt of the claim.

10.3. In the event that an amicable agreement is not reached, the dispute shall be brought to a judicial body in accordance with the current Russian Federation legislation.

10.4. This Privacy Policy and relations between the User and the Operator shall be governed by the current legislation of the Russian Federation.

11. Final Provisions

11.1. The Operator may introduce changes to this Privacy Policy without the User's consent.

11.2. The new Privacy Policy shall come into force upon its posting on the Website, unless otherwise provided for in the new version of the Privacy Policy.

11.3. The current Policy is freely available on the Internet at:

<https://point2meet.ru>.

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