

PRIVACY POLICY FOR THE PROCESSING OF PERSONAL DATA OF USERS OF THE ROSNAVYK WEB SERVICE

1. INTRODUCTION

1.1. This Privacy Policy regarding the processing of personal data (hereinafter referred to as the “Policy”) has been developed in order to implement by Limited Liability Company “Data Diving Academy” (hereinafter — LLC “Data Diving Academy”, the Service Owner, the Operator) the requirements of Article 18.1 of Federal Law No. 152-FZ of July 27, 2006 “On Personal Data” (hereinafter referred to as the Law on Personal Data), as well as the provisions of the legislation of the Russian Federation that determine the cases and specific features of personal data processing and establish requirements for the processing of personal data.

1.2. This Policy defines the procedure for processing personal data and the measures taken by the Operator to ensure the security of personal data.

1.3. The Operator considers the observance of the rights and freedoms of individuals and citizens (the Personal Data Subject) when processing their personal data, including the protection of the rights to privacy, personal and family secrecy, to be its most important goal and condition for carrying out its activities.

1.4. This Policy of the Operator regarding the processing of personal data when organizing and/or performing the processing of personal data applies to all information that the Operator may obtain about a user during their use of the RosNavyk Web Service (hereinafter referred to as the “Service”).

2. BASIC TERMS USED IN THE POLICY

Automated processing of personal data – processing of personal data using computer technology.

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Personal data security – the state of protection of personal data characterized by the ability of users, technical means, and information technologies to ensure the confidentiality, integrity, and availability of personal data during their processing.

Blocking of personal data – temporary suspension of the processing of personal data (except in cases where processing is necessary to clarify personal data).

Web Service – the digital service “RosNavyk”, intended for monitoring and analysis of the labor market of the Russian Federation based on data from open online sources, used by individuals with the help of a computer device (mobile phone, smartphone, or computer, including a tablet computer) connected to the Internet information and telecommunications network. The Service represents, among other things, a set of graphic and informational materials, as well as computer programs and databases ensuring their availability on the Internet at the network address: <https://rosnavyk.ru/>.

Web analytics services (metric services) – external online services and software tools (for example, Yandex.Metrica) intended for collecting and analyzing statistical information about visits to and use of websites in order to improve their operation and understand user behavior.

Access to personal data – the possibility of obtaining personal data and using them.

Legislation of the Russian Federation – the set of provisions of regulatory legal acts of the Russian Federation that determine the cases and specifics of personal data processing and establish requirements for personal data processing.

Personal data information system – a set of information technologies and technical means that ensure the processing of personal data, as well as databases and data storage systems in which personal data are processed.

Other personal data – personal data that do not belong to Special Categories of Personal Data or Biometric Personal Data.

Confidentiality of personal data – a mandatory requirement for the Operator or any other person who has gained access to personal data not to allow their transfer without the consent of the Personal Data Subject or the presence of another legal basis.

Depersonalization of personal data – actions as a result of which it becomes impossible, without the use of additional information, to determine that the personal data belong to a specific User or other Personal Data Subject.

Processing of personal data – any action (operation) or set of actions (operations) performed with personal data using automation tools or without the use of such tools, including collection (obtaining), recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Personal data operator – a state authority, municipal authority, legal entity or individual who independently or jointly with others organizes and/or carries out the processing of personal data, as well as determines the purposes of processing personal data, the composition of personal data to be processed, and the actions (operations) performed with personal data.

Operator's Partner – a legal entity or individual whose products and/or services and/or offerings are promoted by the Operator on the basis of agreements concluded with such person.

Personal data – any information relating to a directly or indirectly identified or identifiable individual (Personal Data Subject) – a user of the Web Service <https://rosnavyk.ru/>.

Personal data permitted by the personal data subject for dissemination – personal data to which access by an unlimited number of persons is granted by the personal data subject by giving consent to the processing of personal data permitted for dissemination in the manner prescribed by the Law on Personal Data.

User – an individual who has access to the Web Service via the Internet and uses the RosNavyk Web Service.

Representative – a person acting on behalf of the personal data subject on the basis of a power of attorney or other document confirming the authority granted to them in accordance with the legislation of the Russian Federation.

Provision of personal data – actions aimed at disclosing personal data to a specific person or a specific group of persons.

Promo Code – a special alphanumeric code provided to the User that grants the right to receive access to the functionality of the Service on preferential terms.

Dissemination of personal data – actions aimed at disclosing personal data to an indefinite number of persons.

Personal data subject – an individual to whom personal data relate.

Cross-border transfer of personal data – transfer of personal data to the territory of a foreign state to a foreign government authority, a foreign individual, or a foreign legal entity.

Third party – any person who is not the personal data subject, the Operator, or an employee authorized by the Operator to process personal data.

Destruction of personal data – actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and/or as a result of which the material carriers of personal data are destroyed.

Authorized body for the protection of the rights of personal data subjects – the federal executive authority responsible for supervising and controlling compliance with the legislation of the Russian Federation in the field of personal data.

3. GENERAL PROVISIONS AND PRINCIPLES OF PERSONAL DATA PROCESSING

3.1. Guided by Federal Law No. 152-FZ of July 27, 2006 “On Personal Data” and other regulatory acts in the field of information protection and personal data, as well as in accordance with the Operator’s internal administrative documents, the Operator processes personal data of Service users in accordance with the following principles:

3.1.1. Personal data shall be processed on a lawful and fair basis.

3.1.2. Processing of personal data shall be limited to the achievement of specific, predetermined, and lawful purposes. Processing of personal data incompatible with the purposes of personal data collection shall not be permitted.

3.1.3. Combination of databases containing personal data, the processing of which is carried out for purposes incompatible with each other, shall not be permitted.

3.1.4. Only personal data that meet the purposes of their processing shall be subject to processing.

3.1.5. The content and volume of processed personal data shall correspond to the stated purposes of processing. Excessiveness of processed personal data in relation to the stated purposes of their processing shall not be permitted.

3.1.6. When processing personal data, the accuracy of personal data, their sufficiency, and, where necessary, their relevance in relation to the purposes of personal data processing shall be ensured. The

Operator shall take the necessary measures and/or ensure their adoption to delete or clarify incomplete or inaccurate data.

3.1.7. Personal data shall be stored in a form allowing the Personal Data Subject to be identified **until the purposes of processing are achieved, until the account of the personal data subject is deleted, or until consent is withdrawn by the Personal Data Subject**, unless another storage period for personal data is established by federal law or by a contract to which the Personal Data Subject is a party, beneficiary, or guarantor. Processed personal data shall be destroyed or depersonalized upon achievement of the purposes of processing or in the event of loss of the necessity to achieve such purposes, unless otherwise provided by federal law. In the event of deletion of the User's account, personal data processing shall cease.

3.2. Full confidentiality of the User's personal data shall be maintained.

3.3. This Policy applies only to the RosNavyk Web Service.

3.4. On the Service website at <https://lk.rosnavyk.ru/register>, in the section "User Registration", the User is given the opportunity to *ознакомиться* with the Privacy Policy regarding the processing of personal data of users of the RosNavyk Web Service and to provide the Service Operator with informed consent to the processing of personal data, thereby confirming a decision made freely, voluntarily, and in the User's own interest, while also expressing specific, subject-oriented, informed, conscious, and unambiguous consent. The conditions for personal data processing, including the purposes, the list of processed data, the periods of processing, and the procedure for withdrawal of consent, are set out in detail in the **Consent to the Processing of Personal Data** form (available at: <https://lk.rosnavyk.ru/docs/soglasie-opd.pdf>).

3.5. Use of the RosNavyk Service means the User's unconditional agreement with this Policy and with the conditions for processing of their personal information specified therein; if the User disagrees with these conditions, the User must refrain from using the RosNavyk Service.

3.6. The User has the right at any time to change (update, supplement) personal data and other data, provided that such changes and corrections contain up-to-date information, by making changes using the functionality of the RosNavyk Service, and also to apply by sending to the Service technical support at **support@rosnavyk.ru** a letter requesting deletion or addition of further information about the User or correction of incorrect information about the User.

3.7. The Operator assumes that the User provides reliable and sufficient personal information on the matters proposed in the forms of the RosNavyk Service and maintains this information up to date. The Operator does not verify the personal data provided.

4. MAIN RIGHTS AND OBLIGATIONS OF THE OPERATOR

4.1. The Operator has the right to:

- receive reliable information and/or documents containing personal data from the Personal Data Subject;
- in the event that the Personal Data Subject withdraws consent to the processing of personal data, as well as sends a request demanding termination of the processing of personal data, continue processing personal data without the consent of the Personal Data Subject if there are grounds specified in the Law on Personal Data;
- independently determine the composition and list of measures necessary and sufficient to ensure fulfillment of the obligations provided for by the Law on Personal Data and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Law on Personal Data or other federal laws.

4.2. The Operator is obliged to:

- when processing personal data, comply with the requirements of the legislation of the Russian Federation regarding the processing and protection of personal data, including the requirements established for the collection of personal data via the Internet: ensure the collection, recording, systematization, accumulation, storage, clarification (updating, amendment), extraction, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion, and destruction of personal data of Personal Data Subjects (citizens of the Russian Federation) using databases located in the territory of the Russian Federation, except in cases provided for by the legislation of the Russian Federation;
- publish or otherwise ensure unrestricted access to this Privacy Policy regarding the processing of personal data of the Service, ensure that Personal Data Subjects' consent is obtained for the use of web analytics services (for example, Yandex.Metrica) and for the collection of technical data by

such services посредством appropriate notices (for example, a cookie banner) on the Service website;

- in cases where the provision of personal data and/or consent to their processing is mandatory in accordance with the requirements of the legislation of the Russian Federation and the Personal Data Subject refuses to provide personal data and/or to provide consent to their processing, explain the legal consequences of the failure to provide personal data and/or consent to their processing;
- respond to appeals and requests of Personal Data Subjects and their legal representatives in accordance with the requirements of the Law on Personal Data, and also provide the Personal Data Subject, at their request, with information concerning the processing of their personal data;
- report to the Authorized Body for the Protection of the Rights of Personal Data Subjects, at the request of that body, the necessary information within 10 days from the date of receipt of such request;
- take legal, organizational, and technical measures to protect personal data against unlawful or accidental access to them, destruction, alteration, blocking, copying, provision, dissemination of personal data, as well as against other unlawful actions in relation to personal data;
- stop the transfer (dissemination, provision, access) of personal data, stop processing, and destroy personal data in the manner and in the cases provided for by the Law on Personal Data;
- perform other obligations provided for by the Law on Personal Data.

5. MAIN RIGHTS AND OBLIGATIONS OF PERSONAL DATA SUBJECTS

5.1. Personal Data Subjects have the right to:

- receive information concerning the processing of their personal data, except in cases provided for by federal laws. Such information shall be provided by the Operator to the Personal Data Subject in an accessible form, and it must not contain personal data relating to other Personal Data Subjects, except where there are lawful grounds for the disclosure of such personal data. The list of information and the procedure for obtaining it are established by the Law on Personal Data;
- require the Operator to clarify their personal data, block or destroy them if the personal data are incomplete, outdated, inaccurate, unlawfully obtained, or are not necessary for the stated purpose of processing, as well as take measures provided by law to protect their rights;
- put forward a condition of prior consent when processing personal data for the purpose of promoting goods, works, and services on the market;
- withdraw consent to the processing of personal data, as well as submit a request to terminate the processing of personal data;
- appeal to the Authorized Body for the Protection of the Rights of Personal Data Subjects or in court against unlawful actions or inaction of the Operator in the processing of their personal data;
- exercise other rights provided for by the legislation of the Russian Federation.

5.2. Personal Data Subjects are obliged to:

- provide the Operator with accurate data about themselves;
- notify the Operator of clarification (updating, amendment) of their personal data.

5.3. Persons who have provided the Operator with false information about themselves, or information about another Personal Data Subject without the latter's consent, shall bear liability in accordance with the legislation of the Russian Federation.

6. PURPOSES OF PERSONAL DATA PROCESSING, LIST OF PERSONAL DATA PROCESSED, LEGAL GROUNDS FOR PROCESSING, TYPES OF PROCESSING

6.1. Purpose of processing:

- Providing the User with access to the functionality of the Service and fulfilling obligations under the Contract concluded with the User.
- Providing paid information Services "Career Profile" (AI Navigator), "Analytical Review" (AI Analyst), "Dashboard Widget" and generating personalized results for the User.
- Establishing feedback with the User, including sending notifications and requests concerning the use of the Service, informing about the list of services and the procedure for their provision.

- Improving the quality and personalization of recommendations provided within the framework of the free and paid services of the Service, convenience of its use, and development of new products and services.
- Carrying out the types of activities provided for by the constituent documents.
- Ensuring the protection of Users' personal data from unauthorized access and disclosure.
- Creating safe conditions for providing Users / Potential users (individuals) with access to the functionality of the Service, information and/or materials contained in the Service.
- Improving the quality of the Service and its services, the convenience of its use, security, and operability.
- Providing the User with service, customer, and technical support, including receipt of the User's appeals, applications, and feedback, and providing responses to such appeals.
- Conducting statistical and other research on the basis of depersonalized data.
- Analyzing the use of the Service by Users, collecting statistics on visits and actions to improve the operation of the Service and its functionality, as well as for conducting marketing research (using web analytics services such as Yandex.Metrica).

6.2. Personal data:

Within the framework of this Policy, "personal data of a Service user" means personal information that the User provides about themselves independently when registering (creating an account) in the Service or in the course of using the Service.

Such information includes:

1. Data provided by the User during registration:

- User's last name, first name, patronymic (if any);
- location (city/locality);
- employment status (employed, studying, not employed);
- name of place of work or study (school, college, university);
- position;
- field of study, class/course;
- contact phone number;
- email address;
- photograph;
- data of a document confirming the legality of the Representative's authority (if necessary).

2. Data provided by the User when using the "Career Profile" Service (AI Navigator):

- Age;
- Average academic performance score;
- Preferred school subjects;
- Information about plans for further education (including intention to relocate and desired place of admission);
- Information about interests and extracurricular activities;
- Results of taking the professional aptitude test;
- List of professional skills selected by the User.

3. Data processed automatically: Other personal data — technical information processed within the Service in the course of its use by the User, including:

- User's IP address;
- information from cookie files;
- User's device identifier;
- information about the User's device;
- information about the User's location (country, region, city) based on the User's IP address or browser/device data;
- type, version, and language of the browser used by the User;
- version and identifier of software;
- type and version of the operating system;
- date and time of the User's use of the RosNavyk Service;
- statistics on the User's use of the functions of the RosNavyk Service;
- information about errors occurring in the operation of components of the RosNavyk Service, including the type and time of the error;
- information about mobile traffic;
- information about emerging security threats;

- information contained in Users' обращения when contacting technical support, including information about the results of consideration of such messages;
- information on the performance of contractual obligations and keeping mutual settlements;
- information on linking the User's equipment (device) to software located on the Internet when using the RosNavyk Service;
- hardware and software configuration of user equipment and installed modules;
- information about addresses of requested Internet pages, reviews and questions, including viewed pages, filling in fields, displays and views of banners and videos, clicks, transitions, time spent on a page, as well as other similar technical information that may become available to the RosNavyk Service during its use by the User.

6.3. Legal grounds:

The legal grounds for the processing of personal data are:

- Public Offer for concluding a contract for the provision of information services of the RosNavyk digital service.
- Consent to the processing of personal data provided by the User, including a User aged 14 to 18, in accordance with the current legislation of the Russian Federation.

By virtue of the Federal Law "On Personal Data," the Operator processes Users' personal data on the basis of their consent provided to the Operator at the moment of performing conclusive actions in the form of registration in the Service.

Within the framework of legal relations with Partners and Users, the Operator is guided by Article 24 of the Constitution of the Russian Federation, the rules of law regulated by Parts 1–4 of the Civil Code of the Russian Federation and contracts concluded with them; the Labor Code of the Russian Federation; the Law of the Russian Federation of 07.02.1992 No. 2300-1 "On Protection of Consumer Rights"; the Law of the Russian Federation of 19.04.1991 No. 1032-1 "On Employment in the Russian Federation"; Federal Law No. 149-FZ of 27.07.2006 "On Information, Information Technologies and Information Protection"; Resolution of the Government of the Russian Federation No. 1119 of 01.11.2012 "On Approval of Requirements for the Protection of Personal Data during Their Processing in Personal Data Information Systems"; the Charter and other internal administrative documents of the Operator.

6.4. Types of personal data processing:

- Collection, recording, systematization, accumulation, storage, clarification (updating, amendment), extraction, use, transfer (provision, access, including to third parties such as Yandex LLC for the operation of the Yandex.Metrica service, as well as to specific Partners (educational organizations or employers) provided that the User gives separate informed consent in the Service interface immediately before activation of the Promo Code), depersonalization, blocking, deletion, destruction of personal data.
- Sending informational letters to an email address.

7. CONDITIONS OF PERSONAL DATA PROCESSING AND THEIR TRANSFER TO THIRD PARTIES

7.1. Processing of personal data of Personal Data Subjects is carried out by the Operator for the purposes defined by this Policy. Depending on the specific purposes of personal data processing, the relevant categories and list of personal data being processed, the procedure for destruction of personal data, as well as the periods of their processing and storage are established, which are defined as the period **until the purposes of processing are achieved, until the account of the Personal Data Subject is deleted, or until consent is withdrawn by the Personal Data Subject**, unless otherwise established by applicable law. In the event of deletion of the User's account, processing of personal data shall cease.

7.2. For the purposes of personal data processing defined by this Policy, the following method of personal data processing shall be applied: automated processing of personal data using computer technology and non-automated processing of personal data (without the use of computer technology). The latter method shall be applied if such processing is necessary in connection with compliance with legal requirements. The Operator's processing of personal data is carried out in compliance with the requirements of the legislation of the Russian Federation and the Operator's internal administrative documents regulating matters of personal data processing and protection. When processing personal data by automated means, the Operator takes the necessary measures to ensure the security of the personal data being processed, including with due regard to the requirements of Resolution of the Government of the Russian Federation No. 1119 dated

November 1, 2012 “On Approval of Requirements for the Protection of Personal Data during Their Processing in Personal Data Information Systems.”

7.2.1. Use of web analytics services. The Operator uses the Yandex.Metrica web analytics service on the RosNavyk Web Service, provided by Yandex LLC (16 L. Tolstoy St., Moscow, 119021, Russia). This software tool is used to collect depersonalized statistical information about User behavior in the Service, such as pages visited, time spent on the Service website, sources of traffic, information about the User’s device and browser, the User’s IP address, and cookies. Such data are collected for the purpose of analyzing use of the Service, improving its operation, and enhancing user experience. Consent to the collection of such data is requested from the User upon the User’s first visit to the Service by means of a special notice (cookie banner). Yandex LLC processes the data received in accordance with its Yandex.Metrica Terms of Use and Privacy Policy. A detailed list of data collected by Yandex.Metrica is available at the address specified in the Policy. The Operator does not combine data collected by Yandex.Metrica with other personal information of Users that makes it possible to identify them, without their explicit consent.

7.3. Processing of personal data is carried out with the consent of the Personal Data Subject to the processing of their personal data (the “**Consent to the Processing of Personal Data**” form is available at: <https://lk.rosnavyk.ru/docs/soglasie-opd.pdf>), while observing their lawful rights and freedoms in accordance with the requirements of the legislation of the Russian Federation in the field of personal data protection, as well as in accordance with internal administrative documents.

7.4. Processing of personal data is necessary for the administration of justice, execution of a judicial act, an act of another body or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings.

7.5. Processing of personal data is necessary for the performance of a contract to which the Personal Data Subject is a party, beneficiary, or guarantor, as well as for the conclusion of a contract at the initiative of the Personal Data Subject or a contract under which the Personal Data Subject will be a beneficiary or guarantor.

7.6. The periods of processing and storage of personal data for each purpose of personal data processing specified in this Policy shall be established as the period until the purposes of processing are achieved, until the account of the Personal Data Subject is deleted, or until consent to the processing of personal data is withdrawn by the Personal Data Subject, unless otherwise established by the legislation of the Russian Federation and/or taking into account the provisions of a contract to which the Personal Data Subject is a party, beneficiary, or guarantor. Processing and storage of personal data shall not be carried out longer than required by the purposes of personal data processing, or until consent is withdrawn, unless otherwise established by the legislation of the Russian Federation.

7.7. Procedure for destruction of personal data:

7.7.1. Destruction of personal data processed within the framework of the purposes specified in the Policy shall be carried out in the following cases:

- upon achievement of the purpose(s) of personal data processing or in the event of loss of the necessity to achieve the purpose(s) of personal data processing, unless otherwise established by the Law on Personal Data and/or other applicable regulatory legal acts of the Russian Federation;
- upon identification of unlawful processing of personal data;
- upon withdrawal by the Personal Data Subject of consent to the processing of personal data, unless otherwise provided by the Law on Personal Data;
- upon submission by the Personal Data Subject of a request to terminate the processing of personal data, unless otherwise established by the Law on Personal Data.

7.7.2. In the absence of legal grounds for the Service Owner to process personal data (conditions for personal data processing), the Service Owner shall, in the manner established by the Law on Personal Data, destroy personal data or ensure their destruction (if the processing of personal data is carried out by a person acting on behalf of the Service Owner). Destruction shall be carried out by performing actions as a result of which it becomes impossible to restore the content of personal data in the Personal Data Information System. Based on the results of the destruction carried out, an act on the destruction of personal data shall be drawn up and an entry shall be made in the electronic event log.

7.8. For the purpose of ensuring effective management of the organization of personal data processing and protection, as well as fulfillment of the obligations established by the legislation of the Russian Federation for personal data operators, the Service Owner has determined the participants in the said management system and their functions:

- The sole executive body represented by the General Director of the Service Owner determines, reviews, and approves the Privacy Policy regarding the processing of personal data of users of the RosNavyk Web Service. The General Director makes decisions on the implementation of actions related to the use of personal data exposed to risk.
- A person responsible for organizing the processing and protection of personal data.

The functions of the person responsible for organizing the processing and protection of personal data include, in particular:

- management of the process of organizing the processing and protection of personal data in accordance with the requirements of the legislation of the Russian Federation, this Policy, and the Operator's internal administrative documents on the processing and protection of personal data;
- development of documents on the processing and protection of personal data; organization of familiarization of the Operator's employees with the provisions of the legislation of the Russian Federation, this Policy, and the Operator's administrative documents on the processing and protection of personal data; organization and implementation of examination of processes within which personal data are processed;
- organization and implementation of software or hardware implementation of the requirements of internal administrative documents on the processing and protection of personal data in the course of operation of the Service, within which personal data are processed;
- organization and implementation of assessment of harm that may be caused to Personal Data Subjects in the event of the Service's violation of the requirements of the legislation of the Russian Federation, and the correlation between such harm and the measures taken by the Service Owner aimed at ensuring fulfillment of the obligations established by the Law on Personal Data;
- development and organization of the application of legal, organizational, and technical measures for the protection of personal data against unlawful or accidental access, destruction, alteration, blocking, copying, provision, dissemination of personal data, as well as against other unlawful actions in relation to personal data;
- organization and implementation of assessment of the effectiveness of the measures taken to ensure personal data security;
- ensuring internal control over the Operator's compliance with the requirements of the legislation of the Russian Federation, this Policy, and other documents on the processing and protection of personal data; exercising control over the receipt and processing of appeals and requests from Personal Data Subjects or their Representatives authorized to represent the interests of Personal Data Subjects on issues of processing of personal data of Personal Data Subjects; interaction with the Authorized Body for the Protection of the Rights of Personal Data Subjects and other competent bodies (state authorities, state institutions, state extra-budgetary funds, municipal authorities) on issues of processing and protection of personal data by the Service;
- ensuring notification of the Authorized Body for the Protection of the Rights of Personal Data Subjects of changes in information on the processing of personal data, as well as of the Operator's intention to carry out cross-border transfer of personal data for the purpose of protecting the rights of Personal Data Subjects;
- notifying the Authorized Body for the Protection of the Rights of Personal Data Subjects of the circumstances specified in the Law on Personal Data in the event of unlawful or accidental transfer (provision, dissemination, access) of personal data resulting in violation of the rights of Personal Data Subjects.

The person responsible for organizing the processing and protection of personal data, in the performance of the functions assigned to them, shall have the right to delegate the functions provided for such person by the legislation of the Russian Federation, this Policy, and other internal administrative documents of the Operator, to persons obliged to execute instructions/orders for the implementation of such functions, and to send instructions and orders on issues of processing and protection of personal data in the manner established by the Operator's administrative documents to employees of the Operator who process personal data and/or have access to personal data. Execution of such instructions and orders shall be mandatory for all.

For the purpose of compliance with the requirements of the legislation of the Russian Federation and the rights of Personal Data Subjects, the person responsible for organizing the processing and protection of personal data shall monitor compliance by Partners and other persons to whom the Service Owner has entrusted the processing of personal data with the requirements of the legislation of the Russian Federation

on personal data processing, as well as the terms of concluded agreements with regard to compliance with the Law on Personal Data.

7.9. In the event that the Service Owner establishes discrepancies between previously obtained personal data of the Personal Data Subject and personal data provided by the Personal Data Subject, their Representative (authorized to represent the interests of the Personal Data Subject), or the Authorized Body for the Protection of the Rights of Personal Data Subjects, together with supporting documents.

7.10. Conditions of personal data processing and transfer to third parties:

- The Operator and person(s) who have gained access to personal data are obliged not to disclose to Third Parties and not to disseminate personal data without the consent of the Personal Data Subject, unless otherwise provided by federal law.
- Receipt by the Service Owner of personal data from a Third Party/Partner and/or transfer (provision, access) of personal data to a Third Party/Partner, as well as entrusting the processing of personal data to a Third Party/Partner, shall be carried out on the basis of an appropriate agreement with the Third Party/Partner, including the conditions of personal data processing, requirements for ensuring the confidentiality and security of personal data during their processing, and other requirements in accordance with the Law on Personal Data.

7.10.1. Transfer of data to Service Partners. The Operator shall have the right to transfer the User's personal data to third parties — Service Partners (educational organizations, universities, colleges, potential employers) in the event that the User uses a special Promo Code of such Partner.

7.10.2. The composition of the data transferred may include: full name, contact details (telephone, e-mail), information about education, region, as well as the results of the analytical reports of the Service (career profile, interests, skills, average score, test results).

7.10.3. The purpose of such transfer is to assist the User in building an educational and career trajectory, including the possibility of receiving offers of admission or internship.

7.10.4. Transfer of data to Partners when using a Promo Code. The Service Owner ensures the technical impossibility of transferring data to a Partner until the User's specific consent is obtained. At the moment of entering the Promo Code, the Service identifies the Partner and displays its full name to the User. Data transfer is carried out only if the User places a tick in a special confirmation field. Without this action, data are not transferred and the Promo Code is not activated.

7.11. Transfer of personal data to state authorities and institutions, municipal authorities, state extra-budgetary funds, as well as receipt of personal data from state authorities and institutions, municipal authorities, and state extra-budgetary funds, is permitted without the consent of the Personal Data Subject to the processing of their personal data in the manner and in the cases provided for by the legislation of the Russian Federation.

7.12. Cross-border transfer of personal data is carried out taking into account the conditions and restrictions established by the Law on Personal Data. Before the commencement of cross-border transfer of personal data, an assessment is carried out of the measures taken by the Third Party to whom the cross-border transfer of personal data is planned, to ensure the confidentiality and security of personal data, in the manner established by the internal administrative documents of the Service Owner. The Service Owner shall notify the Authorized Body for the Protection of the Rights of Personal Data Subjects of the planned cross-border transfer of personal data in the manner provided for by the legislation of the Russian Federation.

7.13. Processing of personal data shall cease upon achievement of the purposes of such processing, as well as upon expiration of the period provided for by the legislation of the Russian Federation, a contract, or the consent of the Personal Data Subject to the processing of their personal data and/or a request to terminate the processing of personal data. Processing of personal data shall cease upon deletion of the Personal Data Subject's account. It shall also cease in the event that the Personal Data Subject withdraws consent to the processing of their personal data (the validity period of consent and the procedure for its withdrawal are defined in detail in Clause 5 of the "Consent to the Processing of Personal Data" form). The Operator shall have the right to continue processing personal data without the consent of the Personal Data Subject provided there are grounds (conditions for personal data processing) предусмотренные by the Law on Personal Data.

8. PROCEDURE FOR CONSIDERATION OF APPEALS AND/OR REQUESTS OF PERSONAL DATA SUBJECTS

8.1. For the purpose of observing the rights and legitimate interests of Personal Data Subjects, the requirements for the time limits for processing appeals and/or requests, ensuring the quality and completeness of measures taken in response to a lawful request of a Personal Data Subject, and providing the necessary information in response to their appeal and/or request, the receipt and processing of appeals of Personal Data Subjects, as well as control over ensuring such receipt and processing, shall be carried out. For this purpose, a Personal Data Subject may obtain any clarifications on issues of interest concerning the processing of their personal data, as well as withdraw their consent to the processing of personal data, by contacting the Service technical support at support@rosnavyk.ru.

8.2. When considering appeals and/or requests of Personal Data Subjects, the Operator shall be guided by the provisions of the legislation of the Russian Federation, according to which a request and/or appeal sent by a Personal Data Subject must contain the information provided for by the Law on Personal Data.

8.3. Provision of information and/or taking other measures in connection with receipt of appeals and/or requests from Personal Data Subjects shall be carried out by the Operator in the scope and within the time limits provided for by the legislation of the Russian Federation. The time limit established by the legislation of the Russian Federation for responding to a Subject's appeal and/or request for information concerning the processing of their personal data may be extended on the basis of the restrictions established by the Law on Personal Data, with a reasoned notice being sent to the Personal Data Subject containing information on the reasons for extension of the period for providing the requested information.

8.4. Having received an appeal and/or request from a Personal Data Subject and having satisfied itself as to its lawfulness, the Service Owner shall provide the Personal Data Subject and/or their Representative authorized to represent the interests of the Personal Data Subject with the information specified in the request, in the form in which the relevant appeal or request was sent, unless otherwise specified in the appeal or request, and/or shall take other measures depending on the nature (specifics) of the appeal and/or request. The information provided by the Service Owner may not contain personal data belonging to other Personal Data Subjects, except in cases where there are lawful grounds for disclosure of such personal data.

8.5. The Operator shall have the right to refuse to satisfy the demands specified in an appeal and/or request of a Personal Data Subject by sending to the Personal Data Subject or their Representative a reasoned refusal, if the Operator has lawful grounds under the legislation of the Russian Federation to refuse performance/satisfaction of the demands received.

9. MEASURES TO ENSURE CONFIDENTIALITY AND SECURITY OF PERSONAL DATA

For the purpose of ensuring the confidentiality and security of personal data of Personal Data Subjects, protection of personal data against unlawful or accidental access to them, destruction, alteration, blocking, copying, provision, dissemination of personal data, as well as against other unlawful actions in relation to personal data, in accordance with the Law on Personal Data, the necessary legal, organizational, and technical measures are taken, or their implementation is ensured (if the processing of personal data is carried out by a person acting on behalf of the Service Owner). In particular, measures are taken to identify current threats to the security of personal data and corresponding organizational and technical protection measures for the established levels of personal data security; control is ensured over the installation and updating of software and/or its components; the list of persons, employees of the Service Owner, who require access to personal data for the performance of their employment duties, where such personal data are processed in the personal data information system, is determined and updated if necessary, as well as other measures provided for by the Law on Personal Data.

10. FINAL PROVISIONS

10.1. This Policy shall become effective and mandatory for compliance from the moment of its approval by the Operator.

10.2. This Policy may be amended at any time at the Operator's discretion.

10.3. In the event that, for one reason or another, one or more provisions of this Policy are recognized as invalid or unenforceable, such circumstances shall not affect the validity or applicability of the remaining provisions of the Policy.

10.4. Any changes to the Operator's personal data processing policy shall be reflected in this document. The Policy shall remain in effect indefinitely until replaced by a new version.

10.5. The current version of the Policy is freely available on the Internet at: <https://lk.rosnavyk.ru/docs/policy.pdf>.