

APPROVED BY:

Order No. 1/22-esg dated April 01, 2022



**МИХАЙЛОВ
И ПАРТНЕРЫ**
СТРАТЕГИЧЕСКИЕ
КОММУНИКАЦИИ

**Joint Stock Company “MIKHAILOV &
PARTNERS. STRATEGIC COMMUNICATIONS
MANAGEMENT”**

OGRN (Primary State Registration Number)

1027700024967

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CEO

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DATA PROCESSING POLICY

1. General

1.1 MIKHAILOV & PARTNERS. STRATEGIC COMMUNICATIONS MANAGEMENT (“the Operator”) considers respect for the rights and freedoms of individuals to be the basic premise of its activities.

1.2 The Operator’s Data Processing Policy (“this Policy”) applies to all information that the Operator can obtain about users and visitors of the website located at <https://esggazeta.ru/> (“the Website”). Personal data is processed in accordance with the Law “On Personal Data” (Federal Law No. 152-FZ).

2. For the purposes of this Policy:

2.1 “**Website**” means a collection of visual and informational content, as well as computer software and databases that ensure the accessibility of such content via the Internet;

2.2 “**User**” means any visitor (whether registered or not) to the Website;

2.3 “**Personal Data**” means any information relating to a User of the Website;

2.4 “**Processing**” means any operation performed on personal data, whether or not by automated means;

2.5 “**Pseudonymization**” means the processing of personal data in such a manner that the personal data can no longer be attributed to a specific User or individual without the use of additional information;

2.6 “**Dissemination**” means any action intended to disclose personal data to an indefinite number of persons;

2.7 “**Transfer**” means any action intended to disclose personal data to a specific group of persons;

2.8 “**Destruction**” means any action intended to cause irreversible destruction of personal data on a computer or any other media.

3. The Operator may process the following personal data:

- last name, first name, patronymic name;
- telephone numbers;
- email addresses;
- user information (location; operating system type and version; browser type and version; device type and screen resolution; referral source (website or ad); operating system and browser language; pages viewed and clickstream; IP address; cookies).

4. Purposes of processing personal data

4.1 The Operator may process personal data for the following purposes:

- to identify, authorize and authenticate users of the Website;
- to process incoming requests from individuals in order to provide advice;
- to process incoming requests from individuals submitted through the Website for subsequent conclusion and performance of contracts related to the Operator’s activities;
- to send notices and information regarding the use of the Website or changes in the Operator’s policies and to process inquiries and requests;

- to inform Users about products and services of the Operator or the Operator's partners, or to provide information that the Operator believes may be of particular interest to you (information, news and promotional mailings), in part, based on your individual preferences;
- to provide targeted advertising to users;
- to evaluate, optimize and improve the Website, its services and their usability in accordance with your preferences.

4.2 Pseudonymized user data collected by web statistics services are used to gather information about Users' activities on the Website, to improve the quality of the Website and its content.

5. Legal basis for processing personal data

5.1 The Operator shall process a User's personal data only if the User has provided such data through the forms available on the Website. By providing personal data to the Operator, the User accepts the terms of this Policy.

5.2 The Operator shall process pseudonymized data relating to a User if the User's browser settings allow it (cookies and JavaScript are enabled).

6. Procedure for collecting, storing, transferring and other processing of personal data

6.1 The Operator shall ensure the security of personal data and take all possible measures to prevent unauthorized access to personal data.

6.2 Under no circumstances will a User's personal data be disclosed to third parties, except as may be required by applicable law, or as may be necessary to provide technical support to the User, or (in a pseudonymized form) for statistical, marketing and other scientific purposes.

6.3 If the User finds any inaccuracies in his or her personal data, the User may update such data by sending an email to the Operator at Prpost@m-p.ru with the subject line "Data Update".

6.4 The period of processing personal data is unlimited. The User may revoke his or her consent to the processing of his or her personal data at any time by sending an email to the Operator at Prpost@m-p.ru with the subject line "Revocation of consent to the processing of personal data".

7. Principles and terms relating to processing of personal data

7.1 The Operator understands the security of personal data as the protection of personal data against unauthorized or accidental access, destruction, alteration, restriction, copying, transfer, dissemination and other unlawful acts related to personal data, and the Operator takes all necessary legal, organizational and technical measures to protect personal data.

7.2 The Operator processes and ensures the security of personal data in accordance with the requirements of the Constitution of the Russian Federation, the Law "On Personal Data" (Federal Law No. 152-FZ), regulations and other federal laws of the Russian Federation establishing when and how personal data may be processed.

7.3 When processing personal data, the Operator shall ensure that personal data are:

- processed lawfully and fairly;
- processed for specified, explicit and legitimate purposes;
- not further processed in a manner that is incompatible with those purposes;
- not combined as a result of the merging of databases containing personal data that are processed for purposes that are incompatible with each other;
- limited to what is necessary in relation to the purposes for which they are processed;
- relevant.

7.4. The Operator shall process personal data only if and to the extent that at least one of the following applies:

- the data subject has given consent to the processing of his or her personal data;
- processing is necessary for achieving legal purposes, for compliance with the functions, powers and duties imposed on the Operator by the laws of the Russian Federation;
- processing is necessary for the performance of a contract to which the data subject is party or beneficiary or guarantor or in order to conclude a contract at the request of the data subject or a contract to which the data subject is party or beneficiary or guarantor;

- processing is necessary for the purposes of the rights and legitimate interests pursued by the Operator or by a third party or for the performance of a task carried out in the public interests, except where such interests are overridden by the rights and freedoms of the data subject;
- the data subject has given or requested access to his or her personal data to an unlimited number of persons;
- personal data is subject to publication or mandatory disclosure under federal law.

7.5. The Operator shall destroy or pseudonymize personal data as soon as the purposes of processing have been achieved or are no longer relevant.

8. Rights of the data subject

Each individual whose personal data is processed by the Operator is entitled to:

Receive from the Operator:

- confirmation that personal data relating to such individual is being processed by the Operator;
- information on the purposes of the processing for which the personal data are intended as well as the legal basis for the processing;
- information on how the Operator processes personal data;
- name and address of the Operator;
- information on persons who have access to personal data or to whom personal data may be disclosed on the basis of a contract with the Operator or on the basis of federal law;
- a list of personal data processed relating to such individual and the source of obtaining such data, unless a different procedure for providing such data is envisaged by federal law;
- information on the period for which personal data will be processed and stored;
- information on how the individual may exercise his or her rights under the Law “On Personal Data” (Federal Law No. 152-FZ);
- information on the ongoing or intended cross-border transfer of personal data;
- name and address of the person processing personal data on behalf of the Operator;
- other information provided for by the Law “On Personal Data” (Federal Law No. 152-FZ) or other federal laws;
- information on the existence of the right to request rectification or erasure of personal data or restriction of processing concerning the data subject if the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing;
- information on the existence of the right to withdraw consent to the processing of personal data;
- information on the existence of the right to demand rectification of unlawful actions of the Operator in relation to the data subject’s personal data;
- information on the existence of the right to lodge a complaint with the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor) or with a court against the actions or omission of the Operator, if the data subject believes that the Operator is processing his or her personal data in violation of the requirements of the Law “On Personal Data” (Federal Law No. 152-FZ) or otherwise violates the data subject’s rights and freedoms;
- information on the existence of the right to protect the data subject’s rights and legitimate interests, including the right to claim pecuniary and/or non-pecuniary damages in court.

9. Liability

9.1 In case of violation of provisions of this Policy, the Operator shall be liable in accordance with the applicable laws of the Russian Federation.

9.2 The current version of the Operator’s Data Processing Policy is published on the Website.

9.3 The Operator has appointed a data protection officer to coordinate actions to ensure the security of personal data.

9.4. Since the Operator may collect personal data only in connection with the use of the Website by the Users and the performance of contracts with the Operator, no notification of the processing of personal data to the supervisory authority is required (Article 22(2)(2) of the Russian Law “On Personal Data” (Federal Law No. 152-FZ dated July 27, 2006).