

PERSONAL DATA PROCESSING POLICY

Limited Liability Company "Programmatic Ecosystems" (Mediasniper platform)

This Personal Data Processing Policy (hereinafter referred to as the Policy) applies to all information that this website, Programmatic Ecosystems Limited Liability Company, can receive about Users of the website on which the text of this Policy is posted.

1. TERMS

1.1. FZ-152 / Law on Personal Data – Federal Law No. 152-FZ dated 27.07.2006 "On Personal Data".

1.2. Personal data (hereinafter referred to as PD) is any information related directly or indirectly to a specific or identifiable natural person (Subject of personal data) that is confidential information of limited access that does not constitute a state secret.

1.3. The subject of personal data (hereinafter referred to as the Subject) is an individual, the carrier of personal data, whose personal data is transferred to the Operator for processing.

1.4. The operator of personal data (hereinafter referred to as the Operator) is Programmatic Ecosystems Limited Liability Company (Programmatic Ecosystems LLC, Mediasniper platform), TIN 7728474136, OGRN 1197746376266, legal address: 121069, Moscow, ext.ter.g. Arbat Municipal district, Povarskaya str., 20, room. 4H, e-mail: info@mediasniper.ru .

1.5. Personal data processing is any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), depersonalization, blocking, deletion, destruction of personal data.

1.6. Website – the Operator's website on the Internet information and telecommunication network (mediasniper.ru), on which the Policy is freely available.

1.7. User is an individual who has access to the Website and uses it for his own purposes.

1.8. Cookies are a small piece of data sent by a web server and stored on the user's computer, which the web client or browser sends each time to the web server in a request when trying to open the page of the corresponding site.

2. GENERAL PROVISIONS

2.1. Purpose

The Policy defines:

2.1.1. the actions of the Operator in relation to the processing of personal data of Users;

2.1.2. the procedure and conditions for processing personal data of Users;

2.1.3. procedures aimed at preventing violations of the legislation of the Russian Federation;

2.1.4. elimination of the consequences of violations related to the processing of personal data.

2.2. The Policy does not apply to relations arising from the processing of personal data of the Operator's employees, relatives of employees, former employees, applicants for vacant positions of the Operator.

2.3. Scope of application

The Policy applies in particular, but not limited to:

- 2.3.1. when navigating on the Website;
- 2.3.2. when using the services offered on the Website;
- 2.3.3. in case of other use of the Site.

3. THE PURPOSES OF PROCESSING, THE LIST OF PROCESSED DATA, THE PERIOD OF STORAGE AND THE PROCEDURE FOR DESTRUCTION

Purpose of processing	List of processed data
Feedback and response to the user's request sent by filling out the contact form on the Website	Email address; name; phone number; account name in the Telegram messenger
Ensuring the smooth operation of the Site and its functions, as well as ensuring the relevance of the display of advertisements	IP address; type of operating system; browser (for example, Google Chrome or Safari); browser language; data on sites visited by the user (site addresses); data on the display of advertisements and user actions in relation to this advertisement. The specified data is collected through cookies in an impersonal form while maintaining the User's anonymity, without forming a personalized profile of the User himself.

Terms of processing and storage of personal data

For all purposes of processing: until the goal is achieved; withdrawal of consent to the processing of personal data.

The procedure for the destruction of personal data

For all purposes of processing: by erasing, deleting from the information system with deletion logging, or in any other way that excludes the possibility of recovery.

4. BASIC RIGHTS AND OBLIGATIONS OF THE PD SUBJECT AND THE OPERATOR

4.1. The subject has the right to:

- 4.1.1. Provide your personal data and consent to their processing;
- 4.1.2. Receive information regarding the processing of his personal data;
- 4.1.3. Require the Operator to clarify his personal data, block them, or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained, or not necessary for the stated purpose of processing, as well as take legally prescribed measures to protect his rights.;
- 4.1.4. Revoke your consent to the processing of personal data;
- 4.1.5. Other rights provided for by the current legislation.

4.2. The PD subject is obliged to:

4.2.1. Provide the Operator with reliable information;

4.2.2. Notify the Operator of a change in their personal data (if this is provided for by the established legal relations of the parties and is applicable to them);

4.2.3. Obtain the consent of third parties whose personal data is provided to the Operator;

4.2.4. Perform other duties stipulated by the legislation of the Russian Federation.

4.3. The Operator has the right to:

4.3.1. Process the personal data of the subject in accordance with the stated objectives;

4.3.2. In case of withdrawal of consent to the processing of personal data, continue processing the personal data of the Subject if there are other legal grounds.;

4.3.3. With the consent of the personal data subject, assign the processing of his personal data to another person.;

4.3.4. Require the PD subject to provide reliable PD;

4.3.5. Other rights stipulated by the legislation.

4.4. The Operator is obliged to:

4.4.1. Ensure confidentiality of personal data. The Operator and other persons who have obtained access to personal data are obliged not to disclose or distribute personal data to third parties without the consent of the Personal Data Subject, unless otherwise provided by law.;

4.4.2. Publish or otherwise provide unrestricted access to the document defining its policy regarding the processing of personal data, information on the implemented requirements for the protection of personal data;

4.4.3. Take the necessary legal, organizational and technical measures or ensure their adoption to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data;

4.4.4. Provide responses to requests and requests from PD Subjects, their representatives and the authorized body for the protection of the rights of personal data subjects;

4.4.5. To bear other obligations stipulated by the legislation.

5. THE PROCEDURE AND CONDITIONS FOR PROCESSING PERSONAL DATA

5.1. The Operator processes personal data of Subjects by performing any action (operation) or set of actions (operations) performed using automation tools or without the use of such tools, including the following: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision), depersonalization, blocking, deletion, destruction using databases located on the territory of the Russian Federation.

5.2. The Operator ensures the accuracy, sufficiency and relevance of personal data in relation to the purposes of processing and takes the necessary measures to remove or clarify incomplete or inaccurate personal data.

5.3. The Operator receives personal data:

- 5.3.1. By personally transferring personal data by the Subject when entering data on the Website;
- 5.3.2. By personal transfer by the Subject within the framework of civil law relations;
- 5.3.3. From third parties (clients, counterparties).

5.4. The Operator receives and begins processing the personal data of the Subject from the moment of receiving his consent.

5.5. Consent to the processing of personal data may be given by the Subject in any form that allows confirming the fact of consent, unless otherwise established by federal law: in writing, electronically or in any other form provided for by applicable law.

In particular, consent to the processing of personal data is considered to have been provided by the Subject by affixing a special mark — a "tick" or "web tag" in a special field on the Operator's Website.

5.6. The Operator receives personal data from other persons, as well as the transfer of instructions for processing personal data, is carried out on the basis of an agreement containing conditions on the procedure for processing and maintaining the confidentiality of the received personal data.

5.7. The Operator does not process publicly accessible categories of personal data of Subjects of personal data.

5.8. The Operator does not process special categories of personal data related to race and nationality, political views, religious and philosophical beliefs, intimate life, criminal record of the Subject of personal data, as well as biometric personal data.

5.9. The Operator does not distribute the personal data of the Subject without his prior separate consent to the processing of personal data authorized by the Subject for distribution.

5.10. The Operator does not carry out cross-border transfer of personal data of Subjects.

5.11. The list of persons allowed to process personal data is determined by the order of the Executive Body and internal local regulations of the Operator.

5.12. If the Operator assigns the processing of personal data to third parties who are not its employees on the basis of concluded contracts (or other grounds), by virtue of which they must have access to the personal data of the Site users, the relevant data is provided by the Operator only after signing the relevant agreement with the persons processing personal data on behalf of the Operator, in which should define: a list of actions (operations) with personal data that will be performed by the person processing them; the purposes of processing; the obligation of such a person to respect the confidentiality of personal data and ensure the security of personal data during their processing should be established; the requirements for the protection of processed personal data in accordance with art. 19 of the Federal Law "On Personal Data" should be specified.

5.13. Cookies are used for convenient operation of the Site. The procedure for collecting, using, and disabling cookies is defined in section 6 of this Policy. When disabling cookies, the Operator does not guarantee the normal operation of the Website.

6. ANONYMIZED TECHNICAL DATA

6.1. Collected data

6.1.1. The Operator may collect the following browser data in an impersonal form while maintaining the user's anonymity through cookies on the Website or for the purpose of properly providing advertising services to clients by interacting with the client's website:

- The user's IP address;
- User's OS type;
- The user's browser (Google Chrome or Safari, for example);
- The user's browser language;
- Information about the sites visited by the user (site addresses);
- Data about the display of advertisements to users and user actions in relation to this advertisement.

6.1.2. Cookies (as defined in clause 1.8 of the Policy) are associated with a specific browser of a particular computer and do not contain information about the user's name, address, phone number, gender, age, or other personal data with which to identify the user.

6.1.3. The User has the option to delete previously saved cookies or restrict their collection using the settings of his web browser. In this case, the Operator does not guarantee the full functionality of the Site and the provision of all its functionality.

6.1.4. The data specified in this section of the Policy is collected by the Operator in relation to the user's browser without forming a personalized profile of the user himself.

6.2. Data Usage

6.2.1. The anonymized data specified in this section of the Policy, collected using cookies and similar tools, is used by the Operator to ensure the relevance of the display of advertisements.

6.2.2. When displaying advertising materials, cookies and various identifiers are not associated either directly or indirectly with the user's personal data. The operator guarantees that there will be no:

- Associate users with online identifiers provided by their devices, applications, tools, and protocols, such as IP addresses, cookie identifiers, or other identifiers;
- Combine online identifiers provided by devices with unique identifiers and other information received by servers to create user profiles and identify them.

6.2.3. The Operator has the right to provide to third parties (clients), upon request, summary statistical aggregated information on the display of advertisements in the browsers of device users that does not contain personal data and does not allow direct or indirect identification of the user's identity.

6.3. Using Yandex.Metrica

6.3.1. The Site uses Yandex.Metrica, a web analytics service provided by Yandex LLC, 16 L. Tolstogo str., Moscow, 119021, Russia.

6.3.2. The information obtained using cookies does not allow identifying the user's identity, but helps to improve the functionality of the Site. This information is transmitted and stored on Yandex servers, which will process it to analyze Website usage, compile reports, and provide other services. The data is processed in accordance with the Yandex.Metrica terms of use.

6.3.3. The User can stop collecting and transmitting data generated by cookies to Yandex at any time, as well as processing them, by installing a blocking plugin for his browser, available at the following link: <https://yandex.ru/support/metrica/ru/general/opt-out>

7. TERMINATION OF PROCESSING, DESTRUCTION OF PERSONAL DATA

7.1. Termination of processing

The operator stops processing personal data in the case of:

- 7.1.1. Achievement of the purpose of PD processing — within thirty days, unless otherwise provided by the contract;
- 7.1.2. Expiration of the PD Subject's consent — within thirty days;
- 7.1.3. Detection of illegal PD processing – within three working days from the date of detection;
- 7.1.4. Inability to ensure the legality of personal data processing — within ten working days;
- 7.1.5. Revocation of the PD Subject's consent, if the storage of the PD is no longer required for the purposes of PD processing — within 30 days;
- 7.1.6. Providing the user with information confirming that the personal data has been illegally obtained or is not necessary for the stated purpose of processing — within 7 working days from the date of submission of such information.;
- 7.1.7. Upon expiration of the established periods of regulatory storage.
- 7.1.8. In case of liquidation of the Operator's legal entity.

7.2. Revocation of consent to the processing of personal

data 7.2.1. A personal data subject may revoke his consent to the processing of personal data at any time, provided that such a procedure does not violate the requirements of the legislation of the Russian Federation. If the Subject withdraws consent to the processing of personal data, the Operator has the right to continue processing personal data without the Subject's consent only if there are legitimate grounds.

7.2.2. In order to revoke consent to the processing of personal data, it is necessary to submit an appropriate application in writing at the Operator's location or electronically by sending it to the Operator's email address specified in clause 1.4 of the Policy.

7.2.3. If the Subject withdraws consent to the processing of his personal data, the Operator stops processing them or ensures the termination of such processing (if the processing is carried out by another person acting on behalf of the Operator) and if the storage of personal data is no longer required for the purposes of their processing, destroys the personal data or ensures their destruction (if the processing is carried out by another person acting on behalf of the Operator). on behalf of the Operator) within a period not exceeding 30 (Thirty) days from the date of receipt of the specified recall, unless otherwise provided by the agreement to which the party, the beneficiary or guarantor of which is the PD Subject, by another agreement between the Operator and the Subject, or if the Operator is not entitled to process the PD without the consent of the Subject on the grounds provided for by the Federal Law or other federal laws.

7.3. Destruction of personal

data 7.3.1. Personal data are destroyed by the Operator in the following cases:

- achievement of the processing objectives or in case of loss of the need to achieve these objectives, unless otherwise provided by federal law;
- at the reasonable request of the personal data subject;
- identification of illegal PD processing of the PD subject;
- in case of expiration of the storage period or withdrawal by the personal data subject of consent to the processing of his personal data (if the personal data is processed by the Operator on the basis of the consent of the personal data subject);
- in case of liquidation of the Operator's legal entity.

7.3.2. In the event of the occurrence of the cases specified in clause 7.3.1 of this Policy, the Operator draws up an Act of PD Destruction or an Act of PD Destruction and Uploads it from the event log to the ISDN in accordance with Roskomnadzor Order No. 179 dated October 28, 2022 and the PD Information Security Regulations.

7.3.3. The destruction of information containing personal data is carried out if the purpose of processing is achieved within a period not exceeding thirty days from the date of achievement of the purpose of PD processing. The destruction of information containing personal data is carried out in the event that the PD subject withdraws consent to the processing of personal data within a period not exceeding thirty days from the date on which the PD subject withdraws consent to the processing of personal data. The destruction of information containing personal data is carried out in case of detection of unlawful processing within a period not exceeding ten working days from the moment of detection of unlawful processing of personal data. If it is impossible to destroy personal data within the time limits established by law, the relevant personal data is blocked and destroyed within no more than six months from the date of the occurrence of the event that causes the destruction of personal data.

7.3.4. Removable media after the expiration of the processing and storage of personal data on them are subject to destruction in order to prevent recovery and further use. This is achieved by deforming, violating the unified integrity of the carrier, or burning it. Drafts of documents, damaged sheets, variants, and unsigned drafts of documents are destroyed by burning, shredding, or otherwise eliminating the restoration of the text of the documents.

7.3.5. The Person responsible for the destruction of information containing personal data is the Person responsible for ensuring the security of personal data.

8. ENSURING THE SAFETY OF PERSONAL DATA

8.1. When processing personal data, the Operator applies legal, organizational and technical measures and ensures their adoption to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in accordance with the requirements for ensuring the security of personal data when processing them in information systems. personal data storage systems, requirements for tangible personal data carriers and technologies for storing such data outside of personal data information systems established by the Government of the Russian Federation.

8.2. Measures to protect personal data are determined by Regulations, Orders, Instructions and other local acts of the Operator.

8.3. The Operator shall take measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the laws of the Russian Federation and regulatory legal acts adopted in accordance with them.

8.4. The Operator independently determines the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Federal Law "On Personal Data" and regulatory legal acts adopted in accordance with it, unless otherwise provided by the said law or other federal laws. These measures include, in particular:

- the appointment of a responsible person for the organization of PD processing;
- publication of a document defining the Operator's policy regarding the processing of personal data, local acts on the processing of personal data;
- familiarization of the Operator's employees directly involved in PD processing with the provisions of the Russian Federation legislation on PD, including requirements for PD protection, documents defining the Operator's policy regarding PD processing, local acts on PD processing, and (or) training of these employees;
- other measures to ensure the safety of personal data applied by the Operator.

9. PROCEDURE FOR PROCESSING REQUESTS AND REQUESTS FROM PERSONAL DATA SUBJECTS

9.1. Confirmation of the fact of personal data processing by the Operator, the legal grounds and purposes of personal data processing, as well as other information specified in Part 7 of Article 14 FZ-152, are provided by the Operator to the personal data subject or his representative when contacting or receiving a request from the personal data subject or his representative. The information provided does not include personal data related to other subjects of personal data, except in cases where there are legitimate grounds for the disclosure of such personal data.

9.2. The request must contain: the number of the main identity document of the personal data subject or his representative, information on the date of issue of the specified document and the issuing authority; information confirming the participation of the personal data subject in relations with the Operator (contract number, date of conclusion of the contract, conditional verbal designation and (or) other information), or information that otherwise confirms the processing of personal data by the Operator; the signature of the personal data subject or his representative.

9.3. The request may be sent in writing or electronically to the location address or the Operator's email address. If the request of the personal data subject does not reflect all the necessary information in accordance with the requirements of the Law on Personal Data, or the subject does not have access rights to the requested information, a reasoned refusal is sent to him.

9.4. The right of a personal data subject to access his/her personal data may be restricted in accordance with Part 8 of Article 14 FZ-152, including if the personal data subject's access to his/her personal data violates the rights and legitimate interests of third parties.

9.5. The Operator undertakes to review and respond to the received request within 10 (ten) business days from the date of receipt of the request.

10. OTHER PROVISIONS

10.1. The Policy and amendments to it are approved by the sole executive body of the Operator, are mandatory for all employees who have access to the personal data of the Subjects, and enter into force from the date of its approval.

10.2. The Operator has the right to make changes to the Policy without the consent of the Subject.

10.3. The Operator shall publish or otherwise provide unrestricted access to this Policy, which defines the Operator's policy regarding the processing of personal data, in particular, but not limited to, by posting on the Website.

10.4. The new version of the Policy comes into force from the moment of publication.

10.5. All issues related to the processing of personal data that are not regulated by the Policy are resolved in accordance with the current legislation of the Russian Federation in the field of personal data, as well as other local acts in the field of personal data adopted by the Operator.

Revision of the Policy dated 07/04/2026