

Personal Data Processing Policy

1. General

This Personal Data Processing Policy has been prepared in compliance with requirements of Federal Law No. 152-FZ of July 27, 2006 On Personal Data (hereinafter referred to as the Law on Personal Data) and specifies the procedure for personal data processing and personal data security measures taken by **WTG LLC** (hereinafter referred to as the Operator).

1.1. Processing personal data, the Operator focuses on the observance of rights and freedoms of a person and citizen, including the protection of the right of privacy, personal and family secrets, and regards this as a condition for the performance of the Operator's activities.

1.2. This Personal Data Processing Policy (hereinafter referred to as the Policy) of the Operator is applied to all information which the Operator may obtain about visitors of the following website: <https://wtg-group.com>

2. Basic Terms Used in the Policy

2.1. Automated personal data processing means personal data processing using computer technology.

2.2. Blocking of personal data means temporary suspension of personal data processing (except for cases where personal data processing is needed for clarification of personal data).

2.3. Website is a set of graphic and information materials, as well as computer programs and databases that ensures their availability on the Internet at the following network address: <https://wtg-group.com>

2.4. Information system of personal data is a set of personal data contained in databases, as well as information technologies and technical means that ensure their processing.

2.5. Depersonalization of personal data means actions as a result of which it is impossible to determine belonging of personal data to a specific User or other personal data owner, unless additional information is used.

2.6. Personal data processing means any action (operation) or a set of actions (operations) performed, with/without the use of automation tools, in respect of personal data, including personal data collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction.

2.7. Operator means a state body, a municipal body, a legal entity, or an individual which/who, independently or jointly with other persons, arranges the processing of and (or) processes personal data, as well as determines the purposes of personal data processing, content of personal data to be processed, actions (operations) performed in respect of personal data.

2.8. Personal data represent any information relating, directly or indirectly, to a specific or identifiable User of the following website: <https://wtg-group.com>

2.9. Distributable personal data mean personal data access to which of an unlimited number of persons has been provided by such personal data owner by giving her/his consent to the processing of the personal data which such a personal data owner has permitted to distribute in accordance with the procedure provided for in the Law on Personal Data (hereinafter referred to as distributable personal data).

2.10. User means any visitor of the following website: <https://wtg-group.com>

2.11. Personal data provision means actions aimed at personal data disclosure to a certain person or a certain group of persons.

2.12 Personal data disclosure means any actions aimed at personal data disclosure to the public (personal data transfer) or familiarization of the public with personal data, including personal data disclosure in the media, publication of information in information and telecommunications networks, or providing access to personal data in any other way.

2.13. International data transfer means personal data transfer to the territory of a foreign country to government authorities of a foreign country, to a foreign physical person, or to a foreign legal entity.

2.14. Destruction of personal data means any actions as a result of which personal data are destroyed irrevocably making it impossible, later on, to restore personal data content in the information system of personal data, and (or) actions as a result of which physical media on which personal data are stored are destroyed.

3. Basic Rights and Obligations of the Operator

3.1. The Operator may:

- receive reliable information and/or documents containing personal data from a personal data owner;
- if a personal data owner does not give her/his consent to personal data processing, the Operator may continue personal data processing on the grounds provided for in the Law on Personal Data;
- at the Operator's discretion, specify the content and list of measures necessary and sufficient for the performance of obligations provided for in the Law on Personal Data and regulations adopted in accordance with it, unless otherwise is provided for in the Law on Personal Data or other federal laws.

3.2. The Operator shall:

- upon a personal data owner's request, provide a personal data owner with information concerning the processing of her/his personal data;
- arrange personal data processing in accordance with the procedure specified in current laws of the Russian Federation;
- reply to requests of personal data owners and their legal representatives in accordance with requirements of the Law on Personal Data;

- upon request of a competent privacy protection authority, provide such a competent privacy protection authority with necessary information within 30 days from the date of receipt of such a request;
- publish or otherwise ensure unlimited access to this Personal Data Processing Policy;
- take legal, organizational, and technical steps to protect personal data against unauthorized or accidental access to them, against their destruction, change, blocking, copying, provision, distribution, as well as against other inappropriate actions in respect of personal data;
- stop transferring (distributing, providing, granting access to) personal data, stop processing of personal data and destroy them in accordance with the procedure and in cases provided for in the Law on Personal Data;
- perform other obligations as set forth in the Law on Personal Data.

4. Basic Rights and Obligations of Personal Data Owners

4.1. Personal data owners may:

- receive information concerning their personal data processing except for cases provided for in federal laws. Information shall be provided to a personal data owner by the Operator in a clear way and shall not contain personal data relating to other personal data owners, except for cases where there are legal grounds for the disclosure of such personal data. The list of information and the procedure to obtain it are specified in the Law on Personal Data;
- request the Operator to clarify her/his personal data, block or destroy them in cases where personal data are incomplete, out-of-date, inaccurate, obtained illegally, or not needed for the specified purpose of processing, as well as take measures provided for in laws to protect their rights;
- specify conditions for the prior consent at the moment of personal data processing for the purposes of marketing of goods, work, and services;
- withdraw her/his consent to personal data processing;
- file a complaint to a competent authority responsible for the protection of rights of personal data owners or file a complaint, through a judicial procedure, about wrongful actions or omissions of the Operator during the processing of her/his personal data;
- exercise other rights provided for in laws of the Russian Federation.

4.2. Personal data owners shall:

- provide the Operator with reliable data about them;
- notify the Operator of the clarification (update, change) of their personal data.

4.3. Persons who have provided the Operator with unreliable data about them or data about any other personal data owner without the consent of the latter shall bear responsibility as set forth in laws of the Russian Federation.

5. The Operator May Process the Following Personal Data of the User

5.1. Surname, name, and patronymic.

5.2. Email address.

5.3. Phone numbers.

5.4. Moreover, the site collects and processes depersonalized data on visitors (including cookie files) using the Internet statistics services (Yandex.Metrica, Google analytics, and others).

5.5. The abovementioned data in the text of the Policy are hereinafter referred to as the Personal Data as a general term.

5.6. The Operator does not process particular categories of personal data concerning race, nationality, political opinions, religion, philosophical belief, or intimate life.

5.7. The processing of distributable personal data from among special categories of personal data specified in part 1 of Article 10 of the Law on Personal Data is allowed, provided that restrictions and conditions contained in Article 10.1 of the Law on Personal Data are complied with.

5.8. The User's consent to the processing of distributable personal data shall be executed separately from other consents to her/his personal data processing. At the same time, the conditions provided for in Article 10.1 of the Law on Personal Data shall be complied with. Requirements concerning the content of consent shall be specified by a competent authority responsible for the protection of rights of personal data owners.

5.8.1. The User shall give her/his consent to the processing of distributable personal data directly to the Operator.

5.8.2. The Operator shall, within three working days from the moment of receipt of the abovementioned consent of the User, publish information about the processing conditions, about any restrictions and conditions concerning the processing of distributable personal data by the public.

5.8.3. Transfer of (distribution, provision, granting of access to) personal data the distribution of which has been allowed by a personal data owner shall be stopped at any moment of time by request of a respective personal data owner. Such a request shall contain surname, name, patronymic (if any), contact details (phone number, email address, or mailing address) of such a personal data owner, as well as a list of personal data the processing of which shall be stopped. Personal data specified in such a request may only be processed by the Operator which it is addressed to.

5.8.4. Consent to processing of distributable personal data shall be terminated, once the Operator receives a request set forth in clause 5.8.3 of the Personal Data Processing Policy.

6. Personal Data Processing Principles

6.1. Personal data shall be processed in accordance with law and on an equitable basis.

6.2. Personal data processing shall be limited by reaching particular predefined legitimate purposes. Personal data processing incompatible with the purposes of personal data collection is not allowed.

6.3. Databases containing personal data processed for purposes incompatible with each other must not be combined.

6.4. Only personal data complying with personal data processing purposes may be processed.

6.5. The content and amount of processed personal data shall comply with specified processing purposes. No redundancy of processed personal data is allowed as regards the specified purposes of their processing.

6.6. During personal data processing, the accuracy of personal data, their sufficiency, and, in particular cases, their relevance to the processing purposes, shall be ensured. The Operator shall take necessary steps and/or make sure that necessary steps are taken to delete or clarify incomplete or inaccurate data.

6.7. Personal data shall be stored in a form allowing the identification of a personal data owner for a period of time not exceeding the period of time necessary for the purposes of personal data processing, unless personal data storage duration is not specified by a federal law and/or a contract a party, a beneficiary, or a surety to which is a personal data owner. Personal data processed shall be destroyed or depersonalized upon reaching the processing purposes or if there is no need for reaching the processing purposes any more, unless otherwise is provided for in federal laws.

7. Personal Data Processing Purposes

7.1. Personal data processing purposes are as follows:

- inform the User by sending email notifications;
- enter into, perform, and terminate civil contracts;
- provide the User with access to services, information and/or materials contained on the following website: <https://wtg-group.com>

7.2. In addition to this, the Operator may send notifications to the User of new products and services, special offers and various events.

The User may always refuse to receive information messages by sending a letter — marked with “Refusal to receive notifications of new products, services, and special offers” — to the Operator’s email address info@wtg.group

7.3. Depersonalized data of Users collected by the Internet statistics services are needed to collect information about actions of Users on the site, improve the site quality and content.

8. Legal Basis for Personal Data Processing

8.1. The legal basis for personal data processing by the Operator includes the following:

- the Operator’s constitutional documents;
- contracts entered into between the Operator and a personal data owner;
- federal laws, other regulations in the field of personal data protection;
- consent of Users to processing their personal data, distributable personal data.

8.2. The Operator may process personal data of the User only if the User herself/himself fills in and sends special forms, available at <https://wtg-group.com> , or sends them to the Operator by email. Filling in respective forms and/or sending her/his personal data to the Operator, the User expressly agrees with this Policy of the Operator.

8.3. The Operator may process personal data of the User only if it is authorized in the User's settings of the browser (cookie files saving is activated and JavaScript technology is enabled).

8.4. A personal data owner, at her/his discretion, takes a decision on the provision of her/his personal data and gives her/his consent voluntarily, acting on her/his behalf.

9. Personal Data Processing Conditions

9.1. Personal data are processed upon the prior consent of a personal data owner to the processing of her/his personal data.

9.2. Personal data processing is needed for the purposes provided for in an international agreement entered into by the Russian Federation or in a law in order to perform functions and obligations imposed on the Operator by laws of the Russian Federation.

9.3. Personal data processing is needed for the delivery of justice, compliance with a judicial order or any other authority's or officer's regulation which shall be complied with in accordance with laws of the Russian Federation concerning enforcement procedures.

9.4. Personal data processing is needed for the performance of a contract a party, a beneficiary, or a surety to which is a personal data owner, as well as for entering into a contract initiated by a personal data owner, or for entering into a contract a party, a beneficiary, or a surety to which is going to be a personal data owner.

9.5. Personal data processing is needed for the implementation of rights or legitimate interests of the Operator and third parties or for the achievement of publicly significant goals, provided that in such a case rights and freedoms of a personal data owner are not infringed.

9.6. Personal data, public access to which has been authorized by a personal data owner or by such a personal data owner's request (hereinafter referred to as the publicly available personal data) are processed.

9.7. Personal data subject to publication or mandatory disclosure, in accordance with a federal law, are processed.

10. The Procedure for Collection, Storage, Transfer, and Other Types of Personal Data Processing

The safety of personal data processed by the Operator is ensured through the implementation of legal, organizational, and technical arrangements necessary for full compliance with requirements of current laws in the field of personal data protection.

10.1. The Operator shall ensure personal data safety and shall take all reasonable steps to prevent unauthorized access to personal data.

10.2. The User's personal data shall never be transferred to any third parties, except for cases associated with the compliance with current laws or cases where a personal data owner gives her/his consent to the Operator to transfer the data to a third party in order to perform obligations under a civil contract.

10.3. If any mistake is revealed in personal data, the User may update them at her/himself discretion by sending a notification, marked “Personal data update”, to the Operator to the following email address of the Operator: info@wtg.group .

10.4. A timeframe for personal data processing depends on the achievement of goals which personal data have been collected for, unless another timeframe is provided for in a contract or current laws.

The User may, at any time, withdraw her/his consent to personal data processing, by sending a notification, marked “Withdrawal of the consent to personal data processing”, to the Operator to the following email address of the Operator: info@wtg.group.

10.5. All information collected by any third party services, including payment systems, communication facilities, and other service providers, is stored and processed by the specified entities (Operators) in accordance with their User Agreements and Privacy Policy. A personal data owner and/or the User shall, at their discretion, timely familiarize themselves with such documents. The Operator bears no responsibility for actions of any third parties, including the service providers specified in this clause.

10.6. Prohibitions specified by a personal data owner on transfer (except for access provision), as well as on processing or on processing terms and conditions (except for access authorization) in respect of distributable personal data, are not valid in case of personal data processing for the state, public, and any other purposes specified by laws of the Russian Federation.

10.7. During personal data processing, the Operator shall ensure personal data privacy.

10.8. The Operator shall store personal data in a form allowing the identification of a personal data owner during a period of time not exceeding the period of time needed for the purpose of personal data processing, unless personal data storage duration is specified by a federal law or a contract a party, a beneficiary, or a surety to which is a personal data owner.

10.9. Personal data processing may be terminated once the personal data processing purposes have been achieved, once the consent given by a personal data owner has expired, once a personal data owner has withdrawn her/his consent, or once unlawful processing of personal data has been revealed.

11. The List of Actions Performed by the Operator in Respect of Personal Data Obtained

11.1. The Operator collects, records, systemizes, accumulates, clarifies (updates, changes), retrieves, uses, transfers (distributes, provides, grants access to), depersonalizes, blocks, deletes, and destroys personal data.

11.2. The Operator ensures automatic personal data processing along with/without the receipt and/or transfer of information via information and telecommunications networks.

12. International Data Transfer

12.1. Before starting the international transfer of personal data, the Operator shall make sure that a foreign country to the territory of which personal data are going to be transferred ensures reliable protection of rights of personal data owners.

12.2. International data transfer to the territories of foreign countries not complying with the abovementioned requirements is possible, provided that a personal data owner gives her/his written consent to the international transfer of her/his personal data and/or performance of a contract a party, a beneficiary, or a surety to which is a personal data owner .

13. Privacy

Except as otherwise provided for in federal laws, the Operator and any other persons who have access to personal data shall not disclose and shall not distribute personal data to any third parties, unless the prior consent of a personal data owner is given.

14. Final Provisions

14.1. The Users may contact the Operator by sending an email to: info@wtg.group to receive any clarifications concerning the processing of their personal data.

14.2. This document will contain all changes made by the Operator in the Personal Data Processing Policy. The Policy is valid for an indefinite period of time until a new version is issued to replace the current version.

14.3. The recent version of the Policy is publicly available in the Internet at the following address:

<https://wtg-group.com/en/privacy.pdf>.