



APPROVED ON  
October 1, 2020

AMENDED ON  
September 13, 2023

AMENDED ON  
September 18, 2024

# **PRIVACY POLICY OF THE VLADIMIR POTANIN FOUNDATION**

## TABLE OF CONTENTS

<b>BRIEF INFORMATION .....</b>	<b>3</b>
<b>GENERAL PROVISIONS .....</b>	<b>4</b>
<b>1. TERMS AND DEFINITIONS .....</b>	<b>4</b>
<b>2. WHAT TYPES OF PERSONAL DATA WE PROCESS AND FOR WHAT PURPOSES? .....</b>	<b>6</b>
<b>3. LEGAL GROUNDS FOR THE PROCESSING YOUR PERSONAL DATA .....</b>	<b>9</b>
<b>4. HOW DO WE PROCESS YOUR PERSONAL DATA? .....</b>	<b>10</b>
<b>5. INFORMATION ABOUT YOU COLLECTED AUTOMATICALLY. USE OF COOKIES.....</b>	<b>10</b>
<b>6. HOW LONG DO WE PROCESS YOUR PERSONAL DATA? .....</b>	<b>11</b>
<b>7. DO THIRD PARTIES TAKE PART IN THE PROCESSING OF YOUR PERSONAL DATA? ...</b>	<b>12</b>
<b>8. DO WE TRANFER YOUR PERSONAL DATA ABROAD?.....</b>	<b>13</b>
<b>9. THIRD-PARTY WEBSITES AND SERVICES.....</b>	<b>13</b>
<b>10. WHAT MEASURES DOES THE FOUNDATION IMPLEMENT TO PROTECT YOUR PERSONAL DATA? .....</b>	<b>13</b>
<b>11. YOUR RIGHTS IN CONNECTION WITH PERSONAL DATA PROCESSING .....</b>	<b>15</b>
<b>12. HOW DO WE BLOCK AND DESTRUCT YOUR PERSONAL DATA? .....</b>	<b>15</b>
<b>13. WHOM MAY I CONTACT WITH RESPECT TO PERSONAL DATA PROCESSING AND EXERCISING MY RIGHTS?.....</b>	<b>16</b>
<b>14. WHAT ARE TIME LIMITS FOR FOUNDATION'S RESPONSES TO REQUESTS? .....</b>	<b>17</b>
<b>15. WHAT ACTIONS DO WE TAKE IF PERSONAL DATA IS PROCESSED UNLAWFULLY, WRONGLY OR ACCIDENTALLY TRANSFERRED TO A THIRD PARTY?.....</b>	<b>17</b>
<b>16. REVISING AND AMENDMENTS .....</b>	<b>18</b>

## **BRIEF INFORMATION**

The Vladimir Potanin Foundation (hereinafter referred to as the **Foundation**) processes your personal data using our information services and is the Personal Data Operator in relation to such data. In this text, we have briefly described the processing of your personal data. More detailed information on our approaches to the processing and protection of your personal data is available below, in the full text of the Privacy Policy.

### **When do we process your personal data?**

We process your personal data only when necessary to achieve the purposes of processing indicated below. For example, the applicant's personal data is processed for participation in the Foundation's competitions, and the employee - for the purpose of effective management of labor relationships. Our purposes for processing personal data are always specific, pre-determined and legal.

### **What personal data do we process?**

The scope of data we process depends on the category of data subjects (for instance, applicant, beneficiary, grantee, counterparty, employee, the member of management body). We collect and process only data needed for accomplishing the specific and lawful goals, which we have defined and described in the Privacy Policy.

### **Do we transfer your personal data to third parties?**

In some cases, we are obliged to provide your personal data to third parties. First and foremost, we transfer your personal data when necessary in accordance with legal requirements, as well as to achieve the processing purposes indicated below. Doing so, we always ensure that we have the necessary legal grounds.

### **Do we transfer your personal data abroad?**

The Foundation does not perform cross-border transfer of personal data; we process your data locally, in the territory of the Russian Federation, in compliance with the requirement of personal data localization.

### **What rights associated with our processing of your personal data do you have?**

You have certain statutory rights with respect to our processing of personal data. You may withdraw your consent to personal data processing; require that we refine, remove, or correct inaccurate data, or block and destroy data, which are incomplete, incorrect, obsolete, and inaccurate, obtained unlawfully, or are excessive for the Foundation; or demand access to information on our processing of your personal data.

If you believe that we are in breach of statutory requirements when processing your personal data, you may send a complaint to the competent authority for the protection of the rights of personal data subjects or file a claim in a court of law.

### **What is our approach towards protection of personal data?**

Ensuring privacy and protection of personal data is a key principle of data processing for the Foundation. To that end, the Foundation takes and will continue to take all necessary technical, legal, and organizational security measures with respect to your personal data.

## GENERAL PROVISIONS

This Privacy Policy of the Vladimir Potanin Foundation (hereinafter – **The Policy, The Foundation**) is a local regulatory act registered at: 125375, Moscow, municipal district Tverskoy, 16 Tverskaya Str., Bldg. 1, regulation our approaches to the processing of personal data which we collect and process on our information resources.

When processing personal data using the Service, the Foundation acts as a Personal Data Operator and is guided by the requirements of laws and other statutory regulations of the Russian Federation in the area of protection of information and personal data, such as Federal Law No. 152-FZ dated July 27, 2006 «*On Personal Data*» Decree of the Government of the Russian Federation No. 1119 dated November 1, 2012 «*On Approval of the Requirements for Personal Data Protection in the Course of Their Processing in Personal Data Information Systems*», and other regulatory acts.

The Foundation's actions regarding the processing of personal data in information systems also are regulated by the Foundation's Regulation on the processing and protection of personal data and other local regulations adopted for these purposes.

### 1. TERMS AND DEFINITIONS

- 1.1. **Automated processing of personal data** is processing of personal data using computer technology.
- 1.2. **Biometric personal data** is information that characterizes physiological and biological characteristics of a person, based on which it is possible to establish his identity and which are used by the Foundation to identify the subject of personal data.
- 1.3. **Beneficiary** is an individual or a legal entity receiving funds or other means of support from the Foundation within the framework of realization of charity programs.
- 1.4. **Blocking** is a temporary termination of the processing of personal data (except in cases where processing is necessary to clarify personal data).
- 1.5. **Unloading from the log** is unloading from the event log in the information personal data system.
- 1.6. **Grantees** are individuals or legal entities receiving free and irrevocable support from the Foundation in forms of funds or in kind for the implementation of projects in areas of activity supported by the Foundation.
- 1.7. **Information system of personal data, ISPDn** is a set contained in the databases of the Personal Data Fund and ensuring their processing relevant information technologies and technical means.
- 1.8. **Counterparty** refers to any legal entity or individual with whom the Foundation enters into contractual relations, excluding labor relations.
- 1.9. **Confidentiality of Personal Data** is the requirement, which the Foundation or other entities which have received access to personal data are obliged to comply with, not to allow the distribution of personal data without the consent of a personal data subject or other legitimate grounds.
- 1.10. **Non-Automated Processing of Personal Data** are any actions with personal data provided that the use, refinement, distribution and deletion of personal data are carried out with the direct participation of person.
- 1.11. **Depersonalization of Personal Data** are actions that result in impossibility of determination ownership of personal data to a specific subject of personal data without the use of additional information.

- 1.12. **Personal Data Processing** is any action (operation) or a group of actions (operations) performed with respect to personal data with or without the use of automation tools, including collection, recording, systematization, accumulation, storage, refinement (updating, amending), extraction, use, transfer (distribution, provision, or access), depersonalization, blocking, deletion and destruction of personal data.
- 1.13. **Personal Data Operator** is a legal entity which, on its own or jointly with other entities, organizes and (or) performs personal data processing and determines the goals of personal data processing, the contents of personal data to be processed and the actions (operations) which are to be taken with respect to personal data. The Personal Data Operator in relation to personal data processed using the Service is the Foundation.
- 1.14. **Data Processing Officer** is the Foundation's employee, whose responsibilities include: exercising internal control over the Foundation's and its employees' compliance with the legislation of the Russian Federation on personal data, including requirements for the protection of personal data; raising awareness of the Foundation's employees on provisions of the legislation of the Russian Federation and local regulations on personal data, requirements for the protection of personal data, organizing the reception and processing of requests from subjects of personal data or their representatives, control over processing of such requests.
- 1.15. **Data Security Officer** is the Foundation's employee, whose responsibilities include: determining the level of protection of personal data processed in information systems, developing security threat models of personal data during their processing in information systems, taking into account requirements and recommendations of legislation on personal data and other responsibilities in accordance with the legislation of the Russian Federation.
- 1.16. **Personal Data** is any information relating directly or indirectly to a specific or identifiable individual (the subject of personal data).
- 1.17. **PC** is a personal electronic computer.
- 1.18. **Provision of Personal Data** are actions aimed at disclosing personal data to a certain person or a certain circle of persons.
- 1.19. **Employees** are the individuals employed by the Foundation.
- 1.20. **Distribution of Personal Data** are actions aimed at disclosure of personal data to an indefinite number of persons.
- 1.21. **Roskomnadzor** is the authorized state agency for the protection of the rights of personal data subjects.
- 1.22. **Service or Services** are information services of the Foundation, including the Foundation's website (<https://www.fondpotanin.ru/>), as well as the portal <https://zayavka.fondpotanin.ru/ru> and its previous version <https://zayavka.fondpotanin.ru>.
- 1.23. **Cross – border Transfer of Personal Data** is a transfer of personal data to a foreign state agency, foreign legal entity or individual located in a foreign state.
- 1.24. **Destruction of Personal Data** are actions resulting in the impossibility of restoring the content of personal data in a personal data information system and (or) the destruction of the tangible media containing personal data.
- 1.25. **Experts** are specialists hired by the Foundation to evaluate competitive applications of potential Beneficiaries, Grantees, conduct research, participate in events held by the Foundation and (or) its partners. Represent a non-profit sector, charity, areas of endowment, fundraising, jurisprudence, social sphere, culture, museums, creative industries, education, popularization of science, information technology and other areas related to the spheres activities of the Foundation.

## **2. WHAT TYPES OF PERSONAL DATA WE PROCESS AND FOR WHAT PURPOSES?**

Our Services allow you to explore information about the Foundation and our activities, mission, history, and management, as well as our competitions, projects, grants, news, and events. You can do all of the above without providing us with any information about yourself, and we will not process your personal data except for information collected automatically (as described in Section 5 of the Policy).

However, our Services have some functions, which can be used only if we process your personal data. In particular, we need your personal data if you want to take part in our programs and competitions. For those purposes, you will need to register a member account on the Foundation's portal. Furthermore, we need your personal data if you are an expert and are helping us in assessing applications and choosing beneficiaries, grantees, i.e. the winners of our competitions and other projects. In any event, we will process data provided to us by yourself or your legal representatives (if applicable), except for information collected automatically (as specified in Section 5 of the Policy).

What follows is more specific information on particular cases where we collect and process your personal data when you use the Services, and what personal data we process for what purposes in each case:

### **2.1. When you register on the Service as a private individual**

- 2.1.1. If you are just planning to apply for participation in charities programs and (or) competitions of the Foundation and want to explore the Service, we provide this opportunity through simple registration.
- 2.1.2. Thus, when registering, we will ask you to consent to processing the following categories of your personal data: surname, first name, patronymic name, gender, phone number, email address.
- 2.1.3. The personal data provided during registration on the Service will be used for your access to the Service and to be able to submit an application for participation in the Foundation's competitions.
- 2.1.4. When you register in your personal account through our Service, we will ask you to provide the Foundation with your consent to process personal data, the list and purpose of processing of which are indicated above. We will ask you to do this at e-form using a simple electronic signature, the key of which is a combination of two elements - the key identifier and password, where the identifier is your mobile phone number and the key password is a code entered from SMS.

### **2.2. When you submit an application to participate in the Foundation's programs and (or) competitions as a private individual**

For the convenience of processing applications for our charity programs and competitions, as well as subsequent interaction between you and the Foundation during the expert examination of applications and the selection process for the Foundation's programs, we use a member account system. This means that the Service has a special interface (portal), where registering involves the processing of your personal data by the Foundation.

For example, when you register a member account, we will ask you to give your consent to the processing of the following types of your personal data (the list of personal data is determined based on the specific competition):

- surname, first name, patronymic name, gender, date of birth, contact number, e-mail, registration address, academic performance; change of surname, employment history (including duration of your employment, job description); educational background, place of residence, nationality, tax residency status, information on grants previously received from the Foundation; and other materials which you upload to the member account (including photographic materials and video recordings).

Subject to your successful completion of the competitive selection stages, we may also need your passport details, bank account details, INN (Taxpayer Identification Number).

We will process your personal data provided in the course of registering your member account for participation in programs and (or) competitions for the following **purposes**:

- ensuring your participation in the Foundation's programs and (or) competitions, including submission of the application, expert examination of applications and selecting winners, concluding and performing agreements with you as a grantee or beneficiary, conducting researches and interviews, providing assistance with your participation in events, your travel, and payment for your accommodation;
- providing you with necessary information during the process of applications and winners (i.e. grantees and beneficiaries) being selected, including via e-mail and text messages;
- exercising the Foundation's legitimate interests, including evaluation of charity programs, providing the public with information on the Foundation's activities (including through publication of grantees' personal data on the Service as set forth in detail in Clause 2.5 of the Policy) reporting and carrying out the statutory activities of the Foundation;
- performing obligations imposed on the Foundation by law, e.g. in providing information to state agencies.

During registration of your member account through our Service, we will ask you to provide the Foundation with consent to the processing of personal data listed above, with the purposes specified above. We will ask you to do that in an electronic form using a basic electronic signature, the key of which is a combination of two elements - the key identifier and password, where the identifier is your mobile phone number and the key password is a code entered from SMS. In exceptional cases, we may ask you to sign the consent to personal data processing in hard copy or confirm your consent otherwise.

Please note that if you are selected as a winner of our competitions or a participant in our other projects, we will enter into an agreement with you, which constitutes an independent basis for the processing of your personal data.

### **2.3. When you submit an application to participate in the Foundation's programs and (or) competitions on behalf of a legal entity**

If you submit an application to participate in a competition on behalf of a legal entity, we also ask you to register a member account and provide your personal data in order for your application to be considered. In that case, the following personal data will be processed:

- surname, first name, patronymic name; gender; date of birth; contact number; e-mail; registration address; academic performance; change of surname; employment history (including duration of your employment, job description, current employment information); educational background; place of residence; nationality; tax residency status; project description; information on grants previously received from the Foundation; and other materials which you upload to the member account (including photographic materials and video recordings).

We will process your personal data provided in the course of registering your member account for participation in programs and/or competitions for the following **purposes**:

- organizing competitions, implementing charity programs in general and ensuring your participation in the Foundation's programs and (or) competitions, in particular, including for submitting an application, conducting an expert assessment of your application, conducting researches, interviews, providing assistance in participating in events, travel, payment for accommodation;

- providing you with the necessary information as part of the application and selection process winners, including, but not limited to, through information mailings via email and sending SMS text messages;
- implementation of the legitimate interests of the Foundation, including for due diligence of counterparties, assessment of charitable programs, informing the public about the activities of the Foundation (including through posting personal data of beneficiaries on the Service, as detailed in clause 2.5 of this Policy), reporting, implementation of the statutory activities of the Foundation;
- performing obligations imposed on the Foundation by law, e.g. providing information to state agencies.

In submitting your application for participation in competitions through your member account on Service, you will be asked to provide the Foundation with consent to the processing of personal data listed above, with the purposes specified above. We will ask you to do that in an electronic form using a basic electronic signature, the key of which is a combination of two elements - the key identifier and password, where the identifier is your mobile phone number and the key password is a code entered from SMS. In exceptional cases, we may ask you to sign the consent to personal data processing in hard copy or confirm your consent otherwise.

#### **2.4. When you register as an expert and plan to conclude an offer with the Foundation**

We appreciate your willingness to help the Foundation in implementing our projects in the areas of education, culture, social sport and philanthropy development. To formalize your registration as an expert, the Foundation asks you to register a member account and provide us with the necessary information about yourself.

In initial registration, we will ask you to give us consent to processing of the following categories of your personal data: surname, first name, patronymic name, gender, date of birth, contact number, e-mail address.

Further, in order to evaluate applications for participation in the competition and receive compensation for this, we will ask you to conclude an offer with the Foundation. To conclude an offer, in addition to the above we will ask you to consent to the processing of the following categories of your personal data: passport details, INN (Taxpayer Identification Number) and SNILS (Personal Insurance Policy Number), registration address, bank details, nationality, tax residence status.

We will process your personal data for the following **purposes**:

- conducting the Foundation's competitions and (or) programs, including sending you applications and materials provided by applicants, grantees, beneficiaries for your expert examination, concluding into and performing agreements with you as a Foundation expert, and conducting researches and interviews;
- remunerating you for your participation in the Foundation's competitions and (or) programs as an expert;
- providing you with necessary information on the Foundation's programs and (or) competitions and your contribution as an expert, including, but not limited to, by sending newsletters through e-mail and text messages;
- exercising the Foundation's legitimate interests, including due diligence of counterparties, conducting an assessment of charity programs, providing the public with information on the Foundation's activities, reporting and carrying out the statutory activities of the Foundation;
- performing obligations imposed on the Foundation by law, e.g. providing information to state agencies.



During registration of your member account through our Service, we will ask you to provide the Foundation with consent to the processing of personal data listed above, with the purposes specified above. We will ask you to do that in an electronic form using a basic electronic signature, the key of which is a combination of two elements - the key identifier and password, where the identifier is your mobile phone number and the key password is a code entered from SMS. In exceptional cases, we may ask you to sign the consent to personal data processing in hard copy or confirm your consent otherwise.

In addition, the Foundation will enter into an agreement with you as an expert, which represents separate grounds for personal data processing.

## **2.5. Publication of grantees' and beneficiaries' personal data on the website**

Pursuant to the legislation on charities, Foundation's principles and guidelines of competitions, Foundation's local regulatory acts and in connection with the Foundation's commitment to the best practices, principles of openness and transparency, we publish information about the Foundation's grantees, i.e. winners of our competitions or participants of our other projects.

We do that only subject to the consent expressed by applicants, grantees, beneficiaries or their legal representatives (if applicable). You may withdraw your consent at any time, and we will cease personal data processing accordingly. To do so, please send us a request to that effect as described in Section 13 of the Policy.

## **2.6. When you want to ask a question and (or) learn more about us**

The Foundation's mission is developing philanthropy culture and addressing socially significant issues. By conducting our programs and (or) competitions, we promote the implementation of large-scale programs in the areas of education, culture, social sports and philanthropy development.

For those who want to know more about our activities, such as programs, competitions, grants, and opportunities for cooperation, we published on our website a convenient online form ("Ask a question"), which helps to contact the Foundation and ask your question.

To consider your enquiry and respond to the question, we need your personal data. We will ask you to provide us with the following data: your first name or, if preferable, your surname, first name, and patronymic name; e-mail; information on the type of your question (whether it relates to a particular program), as well as any other information, which you deem necessary to provide with respect to your question.

We will process the personal data, which we collect when you fill out the contact form, for the purposes of providing you with necessary data and information the Foundation's activities.

In the process of your filling out the online form, we will ask you to give the Foundation consent to personal data processing specified in the form.

## **2.7. When you apply to join the Foundation team and submit your CV**

We publish information about open positions across various platforms, including our website. When you submit your CV for consideration, we will request your consent to process the following personal data for the purposes of reviewing your application, verifying the information provided, and evaluating your professional and business qualifications:

- surname, first name, patronymic name; date of birth; gender; email; phone number; nationality; employment history (including duration of your employment, job description, current employment information); profession; educational background.

## **3. LEGAL GROUNDS FOR THE PROCESSING YOUR PERSONAL DATA**

- 3.1. The Foundation processes personal data only subject to the existence of lawful grounds. In addition to the lawful grounds described in Section 2 of the Policy, the Foundation processes personal data on the following grounds:
  - 3.1.1. when consent to personal data processing has been provided;
  - 3.1.2. for the performance of an agreement with a personal data subject which is a party thereto, a beneficiary thereof or a surety thereunder, and for entry into an agreement at the request of the personal data subject or an agreement under which the personal data subject would be a beneficiary or surety;
  - 3.1.3. for the exercise of the Foundation's or third parties' rights and legitimate interests, including in the cases stipulated by the federal laws of the Russian Federation;
  - 3.1.4. for performance of functions, powers, and duties imposed on the Foundation by the laws of the Russian Federation;
  - 3.1.5. for achievement of purposes, prescribed by international agreements of the Russian Federation or legal requirements;
  - 3.1.6. on other lawful grounds stipulated by the laws of the Russian Federation.

#### **4. HOW DO WE PROCESS YOUR PERSONAL DATA?**

- 4.1. The Foundation process personal data both with the use of automation tools, without them and in mixed processing.
- 4.2. When processing personal data, we perform the following actions (operations) with personal data: collection, recording, systematization, accumulation, storage, refinement (updating, amending), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data.
- 4.3. Furthermore, when we publish our grantees' and beneficiaries' personal data of on the website, they become available to the public. This means that we distribute those personal data. We would like to note once again that, in the absence of other legal grounds, we do that only subject to your consent, which may be withdrawn from the Foundation at any time.

#### **5. INFORMATION ABOUT YOU COLLECTED AUTOMATICALLY. USE OF COOKIES**

To improve the functioning of the Service and make it more convenient, the Foundation may use a special technology called cookies. The Foundation realizes that cookies should be considered personal data to some extent and respective laws regulate their handling. From this section of the Policy, you can learn what cookies are and how the Foundation uses them.

##### 5.1. What are cookies?

- 5.1.1. Cookies are files, which are stored on your device and used to record certain actions on the Service by saving data, which may be updated and recovered. These files contain data, which do not cause any damage to your equipment. They are used to record your preferences, such as language selected and access data, and for personalization of the Service.
- 5.1.2. Cookies may also be used for saving information on how you use the Service, e.g. from what page or advertising banner you came to the Service.

##### 5.2. What types of cookies does the Foundation use and for what purposes?

- 5.2.1. **Session cookies:** these are temporary cookies, which are stored amongst your browser's cookies until you leave the page; these files are not stored on your hard disk. Information received using those files helps us to analyze web traffic directions. In the long run, they allow the Foundation to improve the content of the Service and simplify its use.
- 5.2.2. **Persistent cookies:** these files are stored on the hard drive of a computer, and the Service identifies them each time you visit. Persistent cookies have a defined lifespan. Upon the expiry of that lifespan, they stop functioning. Persistent cookies allow the Service to remember information and settings for a user's subsequent visits, thereby making the viewing of websites more convenient and faster.
- 5.2.3. **Technical cookies:** technical cookies are necessary for the proper functioning of the Service and correct use of various personal capabilities and services offered on it, e.g. such cookies may be used for technical support of a session, response time control, use of security elements, etc.
- 5.2.4. **Personalization cookies:** these cookies allow you to choose or personalize certain features of the Service, e.g. by selecting a language, regional configuration, or browser type.
- 5.2.5. **Analytical cookies:** The Foundation uses cookies to receive information on browser settings and analyze your behavior on the Service in order to improve the Service's productivity.
- 5.2.6. Some cookies used on the website may not be related to the Foundation. This is caused by the fact that some pages contain elements received from third party pages. As such, elements are received from other pages, the Foundation cannot control the configuration of those cookies. If you would like to change your preferences with respect to the configuration of cookies, you should visit such third parties' websites of to receive relevant information.

### 5.3. Your options in administration of cookies

- 5.3.1. We will ask you to provide the separate consent to the processing of cookies. If you do not provide your consent, we will process only technical cookies, which are necessary for the correct functioning of our Service.
- 5.3.2. You may also withdraw your consent to the processing of cookies at any time and remove cookies, which are stored on your computer by changing your browser settings.
- 5.3.3. Finally, if you want to exercise control over the process of setting cookies, you can install special software or add-ons in your browser known as tracking ban tools, which enable you to choose what cookies you allow to be stored on your device.

## 6. **HOW LONG DO WE PROCESS YOUR PERSONAL DATA?**

- 6.1. We process your personal data no longer than required to accomplish the purposes of processing specified herein.
- 6.2. After the accomplishment of the purposes for personal data processing, the Foundation will cease processing and destroy your personal data (and ensure that third parties engaged for processing cease processing and destroy personal data) within 30 (thirty) days, except for the cases when a shorter period is required by applicable laws. In that case we will make all necessary efforts to observe that requirement and cease processing (and ensure that engaged third parties cease processing) within the established time frame.
- 6.3. Within 10 (ten) working days we will also cease processing your personal data (and will ensure that engaged third parties cease processing) if you withdraw your consent to personal data

processing (in cases when consent is the sole lawful ground for processing your personal data) or demand to terminate the processing of personal data.

6.4. Please note that in some cases we may continue personal data processing after the withdrawal of your consent when this is necessary for the performance of our statutory obligations or when the Foundation is entitled to process personal data on other lawful grounds.

6.5. To withdraw your consent to personal data processing, please send us a request to that effect as described in Section 13 of the Policy.

## **7. DO THIRD PARTIES TAKE PART IN THE PROCESSING OF YOUR PERSONAL DATA?**

### **7.1. Engagement of competition operators**

7.1.1. The Foundation engages independent counterparties — partners for the organization and holding competitions (operators of competitions). For the purpose of organizing and conducting competitions, the operator is given access to the data and materials that you uploaded when filling out the competition application. Information about such operators is published on the competition pages on the Foundation's website or can be provided on request.

### **7.2. Processing of personal data within day-to-day business processes of the Foundation**

7.2.1. The Foundation engages specialists and consultants on various technical and other matters and also uses complex information systems and IT infrastructures for various purposes, including those of processing your personal data and ensuring their privacy and protection.

7.2.2. By engaging such persons when required by law and entrusting them with personal data processing on our behalf, the Foundation, as the operator of your personal data, ensures that those third parties keep your data confidential and take the necessary organizational, legal, and technical protection measures. Third parties retained by us process your personal data solely for the purposes of providing respective services to us and by means of performing operations with your personal data as determined by us. Under no circumstances may such parties process your personal data for any purposes contradictory to the specified herein.

### **7.3. Engagement of independent experts**

7.3.1. The Foundation cannot function without engaging independent experts: it is these experts who assess your applications and materials you provide for a competition.

7.3.2. At the same time, we do not transfer any your data to experts. Experts receive access only to the materials, which you uploaded, for assessment when filling in the competition application. Provision of access to such data to experts is necessary for the selection of winners and the implementation of our programs.

### **7.4. Conducting researches and charity programs evaluation**

7.4.1. To improve its activities (in particular, research on the impact of grants competitions of the Foundation for the activities of other grant-giving organizations and its interaction with grantees, improvement and unification of grant procedures, as well as developing standards for interaction with grantees and partners) the Foundation engages counterparties specializing in research and evaluation activities in the non-profit sector. With the aim of obtaining the necessary research and assessment results, the Foundation can provide contractors with access to the personal data you provided in registration with the Service and (or) in filling out an application for participation in the competition.

## 7.5. Compliance with laws, judicial and administrative procedures and obligations to disclose information

7.5.1. The Foundation may transfer your personal data in the following cases (if so required by applicable legislation or is not contradictory to it):

- for compliance with the requirements of applicable legislation, court rulings or inquiries of state agencies;
- in connection with a pending investigation;
- for the purposes of investigation or provision of assistance in the prevention of any violation of applicable legislation, as well as this Policy;
- for the protection of the rights and property, and assurance of the safety of the Foundation and our employees, as well as grantees and applicants for participation in our programs and/or competitions, their legal representatives (if applicable), users of the Service, or other persons;
- for other purposes accruing to applicable in other cases in accordance with applicable law, including in accordance with civil, tax, pension, labor legislation, legislation on charitable activities, military registration, non-profit organizations and endowments of non-profit organizations.

## **8. DO WE TRAFER YOUR PERSONAL DATA ABROAD?**

8.1. The Foundation does not perform cross-border transfer of your personal data, i.e. it does not transfer any of your personal data for processing abroad.

8.2. All personal data are processed by the Foundation using databases located in the territory of the Russian Federation.

8.3. If the Foundation carries out cross-border transfer of personal data, we will ensure compliance with legal requirements when implementing cross-border data transfer.

## **9. THIRD-PARTY WEBSITES AND SERVICES**

9.1. The Service may contain links to websites and applications of third parties (e.g. social media networks such as Telegram, Vk, Odnoklassniki); at the same time, third-party websites and applications may also refer you to our Service.

9.2. The Foundation is not involved and shall not bear liability for the processing of your personal data on such third-party websites and applications or for any policies and practices used by their owners, administrators, or other persons with respect to the processing of their users' personal data.

9.3. For this reason, we strongly recommend that you review the terms of service and the privacy policy of each third-party website, application, etc. you may visit and use.

## **10. WHAT MEASURES DOES THE FOUNDATION IMPLEMENT TO PROTECT YOUR PERSONAL DATA?**

10.1. Ensuring the privacy and protection of your personal data is one of the key principles of their processing by the Foundation. To that end, the Foundation takes and will continue to implement technical, legal, and organizational security measures with respect to your personal data, including:

10.1.1. adoption of local regulations with respect to personal data processing;

- 10.1.2. restricting the range of individuals who have access to personal data;
  - 10.1.3. appointment of officers responsible for the organization of personal data processing and its protection;
  - 10.1.4. conclusion of agreements with persons processing personal data on the Foundation's behalf pursuant to the requirements of the Federal Law No. 152-FZ dated July 27, 2006 «*On Personal Data*»,
  - 10.1.5. provision of unrestricted access to this Policy;
  - 10.1.6. familiarization of Service users with the requirements of federal laws and the Foundation's local regulations on personal data processing and protection;
  - 10.1.7. organization of accounting, storage, and handling of information carriers;
  - 10.1.8. identification of threats to personal data security during its processing and creation of threat models on the basis of such threats;
  - 10.1.9. development of a personal data protection system on the basis of the threat model;
  - 10.1.10. verification of the readiness and effectiveness of information protection tools;
  - 10.1.11. control of user access to information resources and software and hardware tools for information processing;
  - 10.1.12. registration and tracking of the actions taken by personal data information system users;
  - 10.1.13. use of antivirus tools and tools for personal data system recovery;
  - 10.1.14. application, when needed, of firewalling, intrusion detection, security analysis, and cryptographic protection tools;
  - 10.1.15. organization of pass control at the Foundation premises and protection of the rooms where technical tools for personal data processing are located;
  - 10.1.16. use of registered information carriers for personal data transfer (removable hard disks, flash drives, etc.);
  - 10.1.17. prohibiting employees of the Foundation from entering personal data into information systems by means of dictating and processing personal data in the presence of persons not admitted to processing thereof;
  - 10.1.18. placing PC displays in such a way as to preclude the possibility of the viewing of personal data displayed on the screens by persons not admitted to personal data processing;
  - 10.1.19. locating workstations where personal data are processed in separate rooms with restricted access.
- 10.2. The Foundation implements other necessary legal, organizational, and technical measures for the protection of personal data against illegal or accidental access, destruction, amending, blocking, copying, transfer, distribution, and other unlawful actions with respect to personal data, including the measures stipulated by Federal Law No. 152-FZ dated July 27, 2006 «*On Personal Data*», Decree of the Government of the Russian Federation No. 1119 dated November 1, 2012 «*On Approval of the Requirements for Personal Data Protection During the Processing Thereof In Personal Data Information Systems*» and other statutory regulations.

## **11. YOUR RIGHTS IN CONNECTION WITH PERSONAL DATA PROCESSING**

- 11.1. You have the following rights with respect to personal data processing by the Foundation:
- 11.1.1. to withdraw your consent to the processing of your personal data by the Foundation;
  - 11.1.2. to demand that the Foundation refine, exclude, or correct inaccurate, incorrect, obsolete, and incomplete personal data;
  - 11.1.3. to demand that the Foundation block and destruct personal data which were obtained unlawfully or are not necessary for the purposes declared by the Foundation;
  - 11.1.4. to obtain access to your personal data and, in particular, to obtain the following information from the Foundation:
    - the types of personal data to be processed;
    - the purposes of personal data processing;
    - information on persons which have or may receive access to personal data (other than the Foundation employees);
    - list of your personal data to be processed and source thereof;
    - the time frame for personal data processing, including their storage period;
    - other information pursuant to the legislation of the Russian Federation.
  - 11.1.5. to exercise other rights in the area of personal data protection stipulated the legislation of the Russian Federation.
- 11.2. If you believe that we are in breach of statutory requirements when processing your personal data, you may send a complaint to the competent authority for protection of the rights of personal data subjects or file a claim in a court of law.

## **12. HOW DO WE BLOCK AND DESTRUCT YOUR PERSONAL DATA?**

- 12.1. We block your personal data provided that blocking does not entail violation of your rights and legitimate interests or the rights and legitimate interests of third parties, upon receipt of any of the requests directly from you or Roskomnadzor:
- 12.1.1. request for stop unlawful processing of personal data;
  - 12.1.2. request for refinement (correction) of incomplete, outdated, inaccurate or false personal data.
- 12.2. We block your personal data until the investigation of the circumstances is completed that are the subject of a blocking request and, if applicable, we make necessary steps for further investigation.
- 12.3. Personal data is subject to destruction when:
- 12.3.1. illegal processing of personal data has been identified, including your request (of your legal representative), or at the request of Roskomnadzor and it is impossible to ensure its legality and thus eliminate the violation;

- 12.3.2. personal data was obtained illegally or is not necessary for achievement of the stated purposes of processing, including cases where the data circumstances were identified during the consideration (investigation) of your request and (or) a request from Roskomnadzor;
  - 12.3.3. you withdraw your consent to the processing of personal data, and the Foundation has no other legal grounds for continued processing of personal data;
  - 12.3.4. you make a demand for destruction if your personal data are incomplete, out of date or inaccurate;
  - 12.3.5. the purposes of processing personal data have been achieved by the Foundation;
  - 12.3.6. the storage periods provided for by law have expired;
  - 12.3.7. personal data found to be unreliable or obtained illegally at the request of Roskomnadzor;
  - 12.3.8. in other cases provided for by the legislation of the Russian Federation.
- 12.4. We apply the following destruction procedures depending on the media on which contains personal data:
- 12.4.1. personal data contained in information systems is deleted (erased) from such information systems or are depersonalized without the possibility of reverse effect;
  - 12.4.2. personal data contained on electronic media is deleted (erased) from such media or depersonalized without the possibility of reverse effect, or if deletion (erasure) of personal data is technically impossible, the electronic media themselves are destroyed;
  - 12.4.3. personal data contained on other tangible media, are destroyed along with material carriers.
- 12.5. In order to destroy personal data, the Foundation creates a Personal Data Destruction Commission from at least 3 (three) Foundation's employees. The personal composition of the Commission is prescribed by order of the General Director.
- 12.6. After the destruction of personal data, we issue an act on the destruction of personal data. If the processing of personal data was carried out using means automation, then in addition to the act, an Unloading from the journal is done.
- 12.7. The act of destruction of personal data and Unloading from the journal are stored in the Foundation in within 3 (three) years from the date of destruction of personal data.

### **13. WHOM MAY I CONTACT WITH RESPECT TO PERSONAL DATA PROCESSING AND EXERCISING MY RIGHTS?**

- 13.1. To exercise your rights and with respect to any matters related to personal data processing (including amending of incomplete or false personal data, blocking or destruction or deletion of personal data, withdraw of consent), you may contact the Foundation personally and fill out the respective request / notice at the Foundation premises or send us your request:

13.1.1. by e-mail at [data@fondpotanin.ru](mailto:data@fondpotanin.ru);

13.1.2. by post: 125375, Moscow, Municipal district Tverskoy, 16 Tverskaya Str., Bldg. 1.



- 13.2. Please note that we do not consider anonymous messages. Upon receipt of your message, we may ask you to confirm your identity (by providing your passport details) before providing you with a response.

#### **14. WHAT ARE TIME LIMITS FOR FOUNDATION'S RESPONSES TO REQUESTS?**

- 14.1. If we receive a request for information about whether the Foundation holds your personal data, and (or) to familiarize yourself with personal data we reply within 10 (ten) working days from the date of receipt of the request (the period may be extended, but not more than 5 (five) working days, subject to notification being sent to you indicating the reasons for the extension).
- 14.2. If, according to the legislation of the Russian Federation, we have grounds for refusal in providing information about the availability of your personal data to the Foundation and (or) for the same reasons, we cannot provide access to this personal data, then within 10 (ten) working days from the date of receipt of the request we will respond with indicating the grounds for refusal (the period may be extended, but not more than 5 (five) working days, subject to a reasoned notice for extending the deadline).
- 14.3. If we receive information from you (with supporting documents attached) that the personal data processed is incomplete, inaccurate or irrelevant, then within 7 (seven) working days from the date of receipt of the information we will make necessary changes and will send you a response message about this.
- 14.4. If we receive information from you (with supporting documents attached) that personal data was obtained illegally or is not necessary for stated purpose of processing we will destroy such personal data and send you a response message about this within 7 (seven) working days from the date of receipt of information.

#### **15. WHAT ACTIONS DO WE TAKE IF PERSONAL DATA IS PROCESSED UNLAWFULLY, WRONGLY OR ACCIDENTALLY TRANSFERRED TO A THIRD PARTY?**

- 15.1. If we become aware of unlawful processing of personal data (carried out both by the Foundation itself and by a person acting on behalf of the Foundation), within a period not exceeding 3 (three) working days from the date of discovery, the Foundation terminates unlawful processing or ensures that the unlawful processing is stopped by the person acting on behalf of the Foundation.
- 15.2. If, for reasons beyond our control, we cannot ensure the lawfulness of the processing, a period not exceeding 10 (ten) working days from the date of discovery of the unlawful processing, we destroy such personal data or ensure their destruction. We will inform you about the elimination of violations or the destruction of personal data (if Roskomnadzor sends the appeal, the Foundation will also notify his).
- 15.3. If we discover that unauthorized persons have transferred personal data unlawfully or accidentally, then from the moment such an incident is discovered by you, by the Foundation or by Roskomnadzor, we notify Roskomnadzor:
- 15.3.1. within 24 (twenty four) hours about the incident that occurred, about the alleged reasons that led to the violation of your rights, and the alleged harm caused to your rights, about the measures taken to eliminate the consequences of the incident, and also provide information about the person authorized by the Foundation to interact with Roskomnadzor on issues related to the identified incident;
- 15.3.2. within 72 (seventy two) hours about the results of the internal investigation of identified incident, and provide information about the persons whose actions were the cause of the identified incident (if any).

## **16. REVISING AND AMENDMENTS**

- 16.1. The Foundation regularly, but at least once a year, evaluates the Policy for compliance with the current legislation. Taking into account changes in the legislation of the Russian Federation, as well as applicable standards and best practices the Policy may be amended. Amendments to the Policy are made in the same way as its adoption.
- 16.2. If changes to this Policy will require by law to obtain your consent to further processing of data in accordance with the changed terms of this Policy, we shall provide you with notice, ask you to consent and provide the opportunity to refuse to accept changes and further processing of personal data.
- 16.3. Specific aspects of the Policy can be clarified by developing other local regulations of the Foundation.
- 16.4. For all other issues not regulated by the Policy, provisions of applicable legislation and local regulations of the Foundation should guide you.