

PERSONAL DATA PROCESSING POLICY OF MOSCOW COLLEGIUM OF ADVOCATES "TIMOFEEV, VAHRENWALD & PARTNERS"

1. General Provisions

1.1. This Policy (hereinafter referred to as the "Policy") has been prepared in accordance with the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data" (hereinafter referred to as the Law on Personal Data) and defines the policy of the personal data operator - MOSCOW COLLEGIUM OF ADVOCATES "TIMOFEEV, VAHRENWALD & PARTNERS" (TIN 7731397812, PSRN 1147799004638, legal address: Apt. 437, 24 Molodogvardeyskaya St., Moscow, 121351 Russia (hereinafter referred to as the "Operator") in relation to the personal data processing collected using the website <https://tbplaw.com> (hereinafter referred to as the "Website"), and contains information about the requirements implemented by the Operator for the protection of such personal data. The terms used in this Policy and not defined separately herein have the meaning given to them by the legislation of the Russian Federation and, first and foremost, the Law on Personal Data. The Operator processes personal data in accordance with all laws applicable to the protection of personal data, including the General Data Protection Regulation of the European Union 2016/679 (GDPR).

1.2. The Operator sets as its most important goal the observance of the rights and freedoms of man and citizen when processing personal data, including the protection of the rights to privacy, personal and family secrets.

1.3. This Policy shall apply to all information that the Operator may receive about Users of the website <https://tbplaw.com>.

2. Basic concepts used in Policy

2.1. *Automated personal data processing* is personal data processing using computer technology.

2.2. *Blocking of personal data* is temporary cessation of personal data processing (except in cases where processing is necessary to clarify personal data).

2.3. *Website* is a collection of graphic and informational materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address <https://tbplaw.com>.

2.4. *Personal data information system* is a set of personal data contained in databases and the information technologies and technical means that ensure their processing.

2.5. *Depersonalization of personal data* are actions because of which it is impossible to determine, without the use of additional information, the ownership of personal data by a specific User or other subject of personal data.

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

2.7. *Personal data* is any information relating directly or indirectly to a specific or identifiable User of the website <https://tbplaw.com>.

2.8. *Personal data permitted for distribution by the subject of personal data* are personal data, access to which by an unlimited number of persons is granted by the subject of personal data by giving consent to the personal data processing permitted by the subject of personal data for distribution in the manner prescribed

by the Law on Personal Data (hereinafter - personal data permitted for distribution).

2.9. *User* is any User of the website <https://tbplaw.com>.

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

2.11. *Dissemination of personal data* are any actions aimed at disclosing personal data to an indefinite number of persons (transfer of personal data) or familiarizing an unlimited number of persons with personal data, including the publication of personal data in the media, posting in information and telecommunications networks or providing access to personal data in any other way.

2.12. *Cross-border transfer of personal data* is transfer of personal data to the territory of a foreign state to a foreign government body, foreign individual or foreign legal entity.

2.13. *Destruction of personal data* are any actions as a result of which personal data are destroyed irrevocably with the impossibility of further restoration of the content of personal data in the personal data information system and (or) the destruction of tangible media of personal data.

3. Personal data processed by the Operator. Procedure for processing personal data.

3.1. The Operator carries out automated and non-automated processing, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, depersonalization, blocking, deletion, destruction, mixed personal data processing with transmission via the Operator's internal network.

3.2. While viewing the Website, reading the posted texts and downloading other information, certain data about the computer from which the website User views the Website is automatically registered.

3.3. When a User is viewing the Website, the Operator collects the following information: the IP address assigned to the device for accessing the Internet, the type of browser and operating system, the URL of the website from which the transition was made, the date and time of visiting the Website, the number of pages visited, their names, and the duration of viewing.

3.4. The Operator processes and ensures the protection of personal data of the Users who have expressed their consent to the processing of their personal data (hereinafter referred to as "Consent") by sending information through selected web forms (hereinafter referred to as "Web Forms") on the pages of the Website.

3.5. The moment of expression of Consent is:

- sending by the User of a completed Web form on the Operator's Website by placing a mark (clicking) in the corresponding field in the Web form and clicking on the button to send the Web form on the corresponding page of the Website;
- any other direction of personal data by the User using the Website.

3.6. The period of personal data processing by the Operator may not exceed the period determined by the purposes of personal data processing specified in paragraph 4 of this Policy. The condition for termination of personal data processing is also the expiration of the consent or revocation of the consent of the Subject of personal data to their personal data processing, as well as the detection of illegal personal data processing.

4. Purposes of personal data processing, categories of personal data subjects, composition and scope of personal data processing

4.1. The Operator processes the following personal data of users for the purpose of their communication with the Operator:

4.1.1. The following personal data of individuals and/or representatives of legal entities who have contacted the Operator to obtain legal assistance are processed by the Operator for interaction with such individuals for the purposes of concluding contracts for the provision of legal assistance and executing the instructions of the Principals: last name, first name, patronymic; details of the identity document (for an individual); tax identification number; date of birth; registration address; contact information: telephone, email address, residential address and location; other information provided by a person, which is necessary for providing him with legal assistance; place of work and position.

4.1.2. The following personal data of applicants for vacant positions, sent via the Web form on the Operator's Website, are processed by the Operator for the purpose of assessing the employability of employees: last name, first name, patronymic, date of birth, telephone number (mobile), email address, information on education, qualifications, professional training, information on advanced training, information on work experience, previous places of work, information on business and other personal qualities of an evaluative nature provided by the applicant, other data specified in the curriculum vitae.

4.2. Regardless of the specific grounds for personal data processing, the Operator processes them in accordance with all laws and other regulatory legal acts that govern issues of personal data protection, including the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data", the General Data Protection Regulation of the European Union (GDPR). The Operator does everything possible to ensure that personal data is processed in a transparent and secure manner.

5. Consent to the personal data processing and applicable reservations

5.1. The User voluntarily, of his own free will and in his own interests provides their personal data to the Operator.

5.2. By accepting the terms of this Policy, the User confirms that the personal data provided by him/her is accurate. The Operator assumes that the User provides accurate personal data and keeps it up to date.

5.3. By filling in the data fields provided on the Website, the User accepts this Policy and gives his consent to the his personal data processing in the manner and on the terms specified in this Policy. In the event of the provision of personal data of third parties, the User guarantees the consent of such third parties to the processing of their personal data in the manner and on the terms specified in this Policy. In this case, the User also undertakes to notify such third parties about the transfer of their personal data to the Operator and guarantees such notification, as well as the receipt of their consent to the personal data processing.

5.4. By accepting the terms of this Policy, the User confirms that they are aware of their rights and obligations stipulated by the current legislation of the Russian Federation on personal data, in particular, the right to access his personal data, to revoke his consent.

5.5. If the User does not intend to provide personal data or does not accept this Policy, then he/she must stop using the Website, in which case the Operator will not be able to provide the User with the use of the Website.

6. Use of Cookies

6.1. The Operator may collect information about Users' visits to the Website without the Users themselves providing the relevant information. Such information may be obtained using various methods, means and tools of Internet statistics and settings (in particular, Cookie files, Google Analytics services, Yandex.Metrica, web beacons (web beacons - electronic images) together with tracking pixels (tracking pixels) with which the Website counts the number of Users who have visited a certain page and provides access to certain cookie files). The Operator may use such methods, means and tools to promote the Operator's services, provide information about upcoming events. However, such methods, means and tools are not used to identify Users. The collected technical data of Users is used exclusively for statistical purposes.

6.2. By using the Website, the User agrees that the Operator can download cookie files to the User's device in accordance with the conditions described in this Section 6. If the User does not agree that Cookie files are saved on their device, they can independently disable this option in the browser settings. Saved Cookie files can also be deleted at any time in the browser system settings. The User can change their browser settings to accept or reject by default all Cookie files or Cookie files from certain websites, including the Website.

6.3. Disabling some cookies may make it impossible to use certain sections or functions of the Website.

6.4. If the User does not agree with the use of methods, means and tools of Internet statistics and settings, they must stop using the Website, in which case the Operator will not be able to provide the User with the use of the Website.

7. Principles and conditions for processing personal data

7.1. The personal data processing is carried out by the Operator based on the following principles:

- the personal data processing is carried out on a lawful and fair basis;
- the personal data processing is limited to achieving specific, predetermined and legitimate purposes. The personal data processing that is incompatible with the purposes of collecting personal data is not permitted;
- only personal data that meet the purposes of their processing are subject to processing;
- the content and volume of personal data processed must correspond to the stated purposes of processing. The personal data processed must not be excessive in relation to the stated purposes of their processing;
- when processing personal data, the accuracy of personal data, their sufficiency, and, where necessary, relevance in relation to the purposes of processing personal data must be ensured;
- other principles provided for by the current legislation of the Russian Federation.

7.2. The Operator may process personal data in the following cases:

- The User has given Consent to the his personal data processing;
- the personal data processing is necessary for the exercise of the rights and legitimate interests of the Operator to achieve socially significant goals, provided that the rights and freedoms of the User are not violated;
- the personal data processing is carried out for statistical or other research purposes, subject to the anonymization of personal data;
- in other cases stipulated by the current legislation of the Russian Federation.

8. Consent to the personal data processing

8.1. Consent to the personal data processing is given by the User for the entire period required by the Operator to achieve the processing purposes.

8.2. Consent to the personal data processing may be revoked by the User by:

- sending a written notice with a request to stop processing personal data, to the Operator's postal address: 117312, Moscow, P.O. Box 90;
- sending a respective request to stop personal data processing to the email address 9618@apmo.ru.

In case of withdrawal of consent to the personal data processing, the Operator shall cease their processing and destroy the personal data within a period not exceeding 30 (thirty) days from the date of receipt of the withdrawal.

In case of refusal to provide consent to the personal data processing, the Operator will be forced to refuse the Subject of personal data in performing the actions provided for by the above-mentioned purposes of processing personal data.

9. Rights of the Subject of Personal Data

9.1. The subject of personal data has the right:

9.1.1. In person or by sending a written request to the postal address: 117312, Moscow, P.O. Box 90, or to the e-mail address 9618@apmo.ru to receive information regarding the his personal data processing, including: confirmation of the fact of personal data processing by the Operator, legal grounds and purposes of personal data processing, purposes and methods of personal data processing used by the Operator, name and location of the Operator, information about persons (except for the Operator's employees) who have access to personal data or to whom personal data may be disclosed on the basis of an agreement with the Operator or on the basis of federal law, processed personal data related to the relevant Subject of personal data, the source of their receipt, unless another procedure for the submission of such data is provided for by federal law, the terms of personal data processing, including the terms of their storage and other information in accordance with the Russian legislation on personal data or other federal laws.

9.1.2. To demand from the Operator clarification of his personal data, their blocking or destruction if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, and also to take measures provided by law to protect his rights;

9.1.3. Revoke your consent to the personal data processing in the manner provided for in paragraph 8.2. of this Policy.

9.1.4. To appeal the actions or inactions of the Operator to the authorized body for the protection of the rights of personal data subjects or in court if he believes that the Operator processes his personal data in violation of the requirements of the legislation on personal data or otherwise violates his rights and freedoms.

10. Operator's Obligations

10.1. The operator is obliged to:

10.1.1. Process personal data of personal data subjects only if the consent of the personal data subject to the processing of his/her personal data is obtained, except in cases established by the Law on Personal Data, when it is not necessary to obtain such consent.

10.1.2. Explain to the Personal Data Subject the legal consequences of refusing to provide his/her personal data and/or to give consent to their processing if, in accordance with federal law, the provision of personal data and/or obtaining consent to the personal data processing are mandatory.

10.1.3. Ensure the confidentiality of personal data of personal data subjects, do not disclose to third parties or distribute personal data without the consent of the personal data subject, unless otherwise provided by federal law.

10.1.4. Take necessary measures or ensure that they are taken to delete or clarify incomplete or inaccurate personal data.

10.1.5. Provide, upon request of the Personal Data Subject, the information specified in paragraph 9 .1.1. of this Policy, free of charge in an accessible form in the manner and within the timeframes stipulated by the Law on Personal Data.

10.1.6. Take the necessary legal, organizational and technical measures (ensure their adoption) to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution, and other illegal actions in relation to personal data.

11. Representations and warranties

11.1. The Operator never requests information from the User about their race, nationality, political views, religious and philosophical beliefs, health status, or intimate life.

11.2. The Operator processes and carries out measures to protect the personal data of the Users in accordance with the requirements legislation of the Russian Federation, the provisions of this Policy, as well as other documents adopted by the Operator.

12. Ensuring the protection and security of personal data

12.1. The Operator shall take a responsible approach to the issue of protecting collected personal data, implementing the requirements for their protection by taking a set of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the current legislation of the Russian Federation on personal data. The measures applied by the Operator include:

- appointment of a person responsible for organizing the personal data processing;
- application of legal, technical and organizational measures to ensure the security of personal data;
- assessment of the harm that may be caused to personal data subjects in the event of a violation of legal requirements, the ratio of harm and security measures taken by the Operator;
- the use of secure premises with restricted access for the placement of servers of personal data information systems, as well as the use of locked cabinets for storing paper media of personal data;
- familiarization of the Operator's employees directly involved in the personal data processing with the provisions of the Russian Federation legislation on personal data;
- control over the measures taken to ensure the security of personal data.

12.2. The Operator's employees who have received access to the personal data processing are obliged to maintain the confidentiality of personal data.

12.3. The Operator has the right to involve third parties in the personal data processing of the Users of the Website, and the Operator ensures that such third parties accept the appropriate obligations regarding the confidentiality of personal data.

12.4. The Website may contain links to other sites, the procedure for processing personal data on which may differ from this Policy. Before using such sites, Users should familiarize themselves with their Privacy Policy and similar documents posted on such sites.

13. Final provisions

13.1. This Policy is subject to change or addition in cases of relevant changes or additions to the current legislation of the Russian Federation on personal data. This Policy may be amended and/or supplemented at any time at the Operator's discretion. Changes shall come into force from the moment the Operator posts the Policy with changes and/or additions on the Website.

13.2. The current version of the Operator's Policy is posted for viewing by an unlimited number of persons on the Website at the address: <https://tbplaw.com>.

13.3. All issues related to the processing and protection of personal data and not regulated in this Policy are regulated in accordance with the provisions of the current legislation of the Russian Federation on personal data.

Cookie Consent

This document defines the terms and conditions for the receipt and processing by the Operator of the website <https://tbplaw.com> (hereinafter referred to as the "Website") of cookies and similar technologies in order to ensure maximum convenience for users (hereinafter referred to as the "Users"), providing personalized information, remembering preferences in the field of marketing and content of the Website, and helping to obtain the information the User needs.

Cookies are text files that the browser (a program designed for viewing websites and hypertext documents on the Internet) sends to the server each time the pages of the Website are opened.

The Operator uses these files, including for authentication of the User, storage of his personal preferences and settings, navigation on the Website and correct operation of the Website services, web analytics, tracking the status of the User's access session, maintaining statistics on Users and analytics.

The following types of cookies will be used on the Website:

Technical cookies: they are necessary for the correct operation of the website and auxiliary services. Such cookies allow us to determine the hardware and software of the user's device; identify errors in the operation of the website; test new functions to improve the performance of the website.

Analytical cookies: they allow you to count the number of users of the site; determine what actions the User performs on the site (pages visited, time and number of pages viewed). Collection of analytical data is carried out through Yandex Metrika, Google Analytics.

Advertising cookies: they help analyze the sources from which the user came to the site, as well as personalize advertising messages.

Session cookies are files used exclusively in temporary memory. These files are deleted when the User closes the Internet browser window. Persistent cookies are files stored on the device for a long time or until they are deleted manually. These files take into account the information previously entered by the User and allow you not to enter the same data each time you visit the Website.

Information collected using cookies (the User's IP address, date and time of visiting the Website, browser and its version, operating system and its version, device type and model, source of entry to the Website, information about the User's behavior on the Website (including the number and name of pages viewed), age, gender, interests, geographic data, other technical data (cookies, flash, java, etc.) cannot identify the User, but can help the Operator improve the operation of the Website.

Consent of the subject of personal data to their personal data processing when sending requests via the feedback form.

By entering his/her personal data in a special field on the website (hereinafter referred to as the "Website") and then clicking the "Submit" button, checking the box to agree to the personal data processing, as a subject of personal data in accordance with the requirements of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data", as well as other laws applicable to the protection of personal data, including the General Data Protection Regulation of the European Union 2016/679 (GDPR), the User voluntarily, of his/her own free will and in his/her interests gives consent to the processing of the following personal data by the MOSCOW COLLEGIUM OF ADVOCATES "TIMOFEEV, VAHRENWALD & PARTNERS" (TIN 7731397812, PSRN 1147799004638, legal address: Apt. 437, 24 Molodogvardeyskaya St., Moscow, 121351 Russia (hereinafter referred to as the "Operator")):

- last name, first name, patronymic;
- mobile phone number;
- email address;
- position held;
- the name of the organization in which the User works (if applicable);
- other information (the above list may be shortened or expanded depending on the specific case and the purposes of processing).

The purposes of processing personal data are:

- ensuring communication between the User and the Operator,
- providing the User with reference information,
- providing the User with consultations on issues related to the work and services provided, and support for the User,
- the Operator's works and services by establishing direct contacts with the User.

The operator may process personal data using automation tools or without using such tools by collecting, recording, systematizing, accumulating, storing, clarifying (updating, changing), extracting, using, transferring (providing, accessing, distributing), blocking, deleting, destroying.

The operator has the right to transfer personal data to third parties or entrust the personal data processing to third parties if this is necessary to achieve the purpose of their processing in accordance with the Personal Data Processing Policy, as well as in cases stipulated by the current legislation of the Russian Federation on personal data.

The operator will process personal data no longer than required by the purposes of their processing, unless other periods are provided for by the current legislation of the Russian Federation on personal data.

This consent is valid from the date of its signing until the date of its revocation by the User in writing. The User is informed that this consent may be revoked by him/her by submitting a written statement of revocation of consent to the Operator.

By expressing this consent, the User confirms the relevance and accuracy of the personal data provided by him.

In case of provision of personal data of third parties, the User of the Website guarantees the consent of such third parties to the processing of their personal data in the manner and on the terms specified in this Policy. In this case, the User also undertakes to notify such third parties about the transfer of their personal data to the Operator and guarantees such notification, as well as the receipt of their consent to the personal data processing.