

Privacy Policy

Last updated: 23 January 2025

1. General provisions

This Privacy Policy is drawn up in accordance with the requirements of the Federal Law dated 27.07.2006. No. 152-FZ “On Personal Data” (hereinafter - the Law on Personal Data) and defines the order of personal data processing and measures to ensure the security of personal data undertaken by DV Pay (hereinafter - the “Operator”).

The Operator sets as its most important goal and condition of its activity the observance of human and citizen's rights and freedoms in the processing of personal data, including the protection of the rights to privacy, personal and family secrecy.

This Privacy Policy (hereinafter referred to as the “Policy”) applies to all information that the Operator may obtain about visitors to the website <https://dv.net/>.

2. Definitions

- “Automated processing of personal data” is processing of personal data using computer facilities.
- “Blocking of personal data” is temporary cessation of personal data processing (except for cases when processing is necessary to clarify personal data).
- “Website” is a set of graphic and informational materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address <https://dv.net/>.
- “Personal data information system” is a set of personal data contained in databases and information technologies and technical means ensuring their processing.
- “Personal data depersonalization” is considered as actions, in a result of which it is impossible to determine, without the use of additional information, the belonging of personal data to a particular User or other subject of personal data.
- “Processing of personal data” is any action (operation) or set of actions (operations) performed with or without the use of means of automation with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution,

provision, access), depersonalization, blocking, deletion, destruction of personal data.

- “Operator” is a state authority, municipal authority, legal entity or individual, independently or jointly with other persons organizing and (or) carrying out processing of personal data, as well as determining the purposes of personal data processing, composition of personal data subject to processing, actions (operations) performed with personal data.
- “Personal data” is any information relating directly or indirectly to a certain or defined User (Customer) of <https://dv.net/>.
- “Personal data authorized by the subject of personal data for dissemination” is a personal data to which access to an unlimited number of persons is granted by the subject of personal data by giving consent to the processing of personal data authorized by the subject of personal data for dissemination in accordance with the procedure provided for by the Law on Personal Data (hereinafter referred to as personal data authorized for dissemination).
- “User” is any visitor of the website <https://dv.net/>.
- “Personal data subject” is natural person (Website User) who owns the personal data and can be identified based on it.
- “Provision of personal data” is considered as any actions aimed at disclosure of personal data to a certain person or a certain circle of persons.
- “Dissemination of personal data” is considered as any actions aimed at disclosure of personal data to an indefinite number of persons (transfer of personal data) or at familiarization of personal data to an unlimited number of persons, including disclosure of personal data in mass media, placement in information and telecommunication networks or providing access to personal data in any other way.
- “Cross-border transfer of personal data” is a transfer of personal data to the territory of a foreign country to a foreign government authority, a foreign individual or a foreign legal entity.
- “Destruction of personal data” is considered as any, in a result of which personal data are irretrievably destroyed with the impossibility of further recovery of the content of personal data in the information system of personal data and (or) material carriers of personal data are destroyed.

3. Rights and obligations of the Operator

3.1. Operator has the right to:

- to receive from the subject of personal data reliable information and/or documents containing personal data;
- in case the personal data subject revokes his/her consent to personal data processing, the Operator has the right to continue personal data processing without the consent of the personal data subject if there are grounds specified in the Law on Personal Data;
- independently determine the composition and the list of measures necessary and sufficient to ensure the fulfilment of obligations stipulated by the Law on Personal Data and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Law on Personal Data or other federal laws.

3.2. Operator is obliged to:

- provide the personal data subject, upon his/her request, with information regarding the processing of his/her personal data;
- organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;
- respond to appeals and requests of personal data subjects and their legal representatives in accordance with the requirements of the Law on Personal Data;
- report to the authorized body for the protection of the rights of personal data subjects at the request of this body the necessary information within 30 days from the date of receipt of such a request;
- publish or otherwise provide unrestricted access to this Policy on personal data processing;
- take legal, organizational and technical measures to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unlawful actions with regard to personal data;
- cease transfer (dissemination, provision, access) of personal data, stop processing and destroy personal data in the manner and cases stipulated by the Law on Personal Data;
- fulfil other obligations stipulated by the Law on Personal Data.

4. Rights and obligations of personal data subjects

4.1. Personal data subjects have the right to:

- to receive information regarding the processing of his/her personal data, except for cases stipulated by federal laws. Information shall be provided to the subject of personal data by the Operator in an accessible form and shall not contain personal data relating to other subjects of personal data, except in cases where there are legal grounds for disclosure of such personal data. The list of information and the procedure for obtaining it is established by the Law on Personal Data;
- to demand from the operator to clarify his personal data, block or destroy them in case the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, as well as to take measures provided by law to protect his rights;
- to impose a condition of prior consent when processing personal data in order to market goods, works and services;
- to withdraw consent to the processing of personal data;
- to appeal to the authorized body for the protection of the rights of personal data subjects or in court against unlawful acts or omissions of the Operator in the processing of his/her personal data;
- to exercise other rights provided for by the legislation of the Russian Federation.

4.2. Personal data subjects are obliged to:

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

4.3. Persons who have provided the Operator with false information about themselves or information about another subject of personal data without the consent of the latter shall be liable in accordance with the legislation of the Russian Federation.

5. User's personal data that Operator may process

- Surname, first name, patronymic.
- E-mail address.
- Username in Telegram.

- 5.1. The Website also collects and processes anonymized visitor data (including cookies) using Internet statistics services (Yandex Metrics and Google Analytics and others).
- 5.2. The aforementioned data are hereinafter in the text of the Policy combined under the general term Personal Data.
- 5.3. The Operator does not process special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, intimate life.
- 5.4. The processing of personal data authorized for dissemination from among the special categories of personal data specified in part 1 of Article 10 of the Law on Personal Data is allowed if the prohibitions and conditions stipulated in Article 10.1 of the Law on Personal Data are complied with.
- 5.5. The User's consent to the processing of personal data authorized for dissemination is executed separately from other consents to the processing of his/her personal data. The conditions stipulated in particular in Article 10.1 of the Law on Personal Data are observed. The requirements for the content of such consent shall be established by the authority authorized to protect the rights of personal data subjects.
 - 5.5.1. The User provides the Operator directly with the consent to the processing of personal data authorized for dissemination.
 - 5.5.2. The Operator is obliged to publish information about the conditions of processing, prohibitions and conditions for processing of personal data authorized for dissemination by an unlimited number of persons no later than three working days after the receipt of the said consent of the User.
 - 5.5.3. The transfer (dissemination, provision, access) of personal data authorized by the subject of personal data for dissemination shall be terminated at any time at the request of the subject of personal data. This request shall include the surname, first name, patronymic (if any), contact information (telephone number, e-mail address or postal address) of the personal data subject, as well as a list of personal data whose processing is to be stopped. The personal data specified in this request may be processed only by the Operator to whom it is sent.
 - 5.5.4. Consent to the processing of personal data authorized for dissemination terminates upon receipt by the Operator of the request specified in clause 5.5.3 of this Policy on Personal Data Processing.

6. Principles of personal data processing

- 6.1. The processing of personal data is carried out on a lawful and fair basis.
- 6.2. The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data incompatible with the purposes of personal data collection is not permitted
- 6.3. Databases containing personal data processed for incompatible purposes may not be merged.
- 6.4. Only personal data that meet the purposes for which they are collected may be processed.
- 6.5. The content and scope of processed personal data correspond to the stated purposes of processing. The processed personal data may not be redundant in relation to the stated purposes of processing.
- 6.6. When processing personal data, the accuracy of personal data, its sufficiency and, where necessary, relevance in relation to the purposes of personal data processing shall be ensured. The Operator takes the necessary measures and/or ensures that they are taken to delete or clarify incomplete or inaccurate data.
- 6.7. Personal data shall be stored in a form that allows identification of the personal data subject for no longer than required by the purposes of personal data processing, unless the period of personal data storage is established by federal law, contract to which the personal data subject is a party, beneficiary or guarantor. Processed personal data shall be destroyed or depersonalized upon achievement of the purposes of processing or in case of loss of necessity to achieve these purposes, unless otherwise provided for by federal law.

7. Purposes of personal data processing

- 7.1. The purpose of the processing of the User's personal data:
 - identification of the User registered on the Website;
 - providing the User with access to personalized resources of the Website;
 - establishing feedback with the User regarding the sending of notifications, requests, updates and provision of services;
 - creating an account for further work with the Site;

- providing the User with effective technical support in case of problems related to the use of the Website.

7.2. The User's anonymized data collected through Internet statistics services are used to collect information about the User's activities on the website, to improve the quality of the website and its content.

8. Legal basis of personal data processing

The legal basis for processing of personal data by the Operator are:

- Federal laws, other regulatory and legal acts in the field of personal data protection;
- Users' consent to the processing of their personal data, to the processing of personal data authorized for dissemination.

8.1. The Operator processes the User's personal data only if it is filled in and/or sent by the User through special forms located on the website <https://dv.net/> or sent to the Operator by e-mail. By filling in the relevant forms and/or sending his/her personal data to the Operator, the User expresses his/her consent to this Policy.

8.2. Operator processes anonymized data about the User if this is allowed in the User's browser settings.

8.3. The personal data independently decides on the provision of his/her personal data and gives his/her consent freely, of his/her own free will and in his/her own interest.

9. Conditions of personal data processing

9.1. Processing of personal data is carried out with the consent of the data subject to the processing of his/her personal data.

9.2. Processing of personal data is necessary to achieve the purposes provided for by an international treaty of the Russian Federation or by law, to fulfil the functions, powers and duties assigned to the operator by the legislation of the Russian Federation.

9.3. Processing of personal data is necessary for the administration of justice, execution of a judicial act, act of another authority or official subject to

execution in accordance with the legislation of the Russian Federation on enforcement proceedings.

- 9.4. Processing of personal data is necessary for the execution of an agreement to which the personal data subject is a party or a beneficiary or guarantor, as well as for the conclusion of an agreement at the initiative of the personal data subject or an agreement under which the personal data subject will be a beneficiary or guarantor.
- 9.5. Processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator or third parties or for the achievement of socially important purposes, provided that the rights and freedoms of the personal data subject are not violated.
- 9.6. Processing of personal data is carried out where access to which is granted to an unlimited number of persons by the data subject or at his/her request (hereinafter referred to as publicly available personal data).
- 9.7. Processing of personal data subject to publication or mandatory disclosure in accordance with federal law.

10. Procedure for collection, storage, transfer and other types of personal data processing

- 10.1. Security of personal data processed by the Operator is ensured by implementing legal, organizational and technical measures necessary for full compliance with the requirements of the current legislation in the field of personal data protection.
- 10.2. Operator ensures the safety of personal data and takes all possible measures to exclude access to personal data by unauthorized persons.
- 10.3. User's personal data will never, under no circumstances, be transferred to third parties, except in cases related to the execution of the current legislation or if the subject of personal data has given his/her consent to the Operator to transfer the data to a third party for the fulfilment of obligations under a civil law contract.
- 10.4. The term of personal data processing is determined by the achievement of the purposes for which the personal data were collected, unless another term is stipulated by the contract or the applicable law.

- 10.5. All information that is collected by third-party services, including payment systems, means of communication and other service providers, is stored and processed by these persons (Operators) in accordance with their User Agreement and Privacy Policy. The subject of personal data and/or the User is obliged to familiarize himself/herself with the said documents in due time. The Operator is not responsible for the actions of third parties, including the service providers specified in this clause.
- 10.6. The prohibitions established by the personal data subject on the transfer (except for granting access) as well as on the processing or conditions of processing (except for access) of personal data authorized for dissemination do not apply in cases of processing personal data in the state, public and other public interests defined by the legislation of the Russian Federation.
- 10.7. When processing personal data, the Operator shall ensure confidentiality of personal data.
- 10.8. Operator shall store personal data in a form that allows identification of the subject of personal data for no longer than required for the purposes of personal data processing, unless the period of storage of personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor.
- 10.9. The condition for termination of personal data processing may be the achievement of the purposes of personal data processing, expiry of the personal data subject's consent or withdrawal of consent by the personal data subject, as well as detection of unlawful processing of personal data.

11. List of actions performed by the Operator with the received personal data

- 11.1. Operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (disseminates, provides, accesses), depersonalizes, blocks, deletes and destroys personal data.
- 11.2. Operator carries out automated processing of personal data with or without receiving and/or transmitting the received information via information and telecommunication networks.

12. Cross-border transfer of personal data

- 12.1. Prior to the commencement of cross-border transfer of personal data, the Operator is obliged to ensure that the foreign state, on whose territory the

transfer of personal data is to be carried out, provides reliable protection of the rights of personal data subjects.

- 12.2. Cross-border transfer of personal data to the territory of foreign states that do not meet the above requirements may be carried out only if the personal data subject consents in writing to the cross-border transfer of his/her personal data and/or fulfils an agreement to which the personal data subject is a party.

13. Confidentiality of personal data

The operator and other persons who have access to personal data are obliged not to disclose to third parties and not to disseminate personal data without the consent of the subject of personal data, unless otherwise provided by federal law.

14. Final provisions

- 14.1. This document shall reflect any changes to the Operator's Privacy Policy. This Policy is valid indefinitely until replaced by a new version.
- 14.2. The current version of the Privacy Policy is freely available on the Internet at <https://dv.net/docs/privacy-policy>.