

## **Privacy Policy of “DNA-Technology”, LLC**

### **1. General**

1.1. This Personal Data Processing Policy (hereinafter referred to as the Policy) is prepared in accordance with the requirements of the Federal Law dated 27.07.2006 No. 152-FZ “On Personal Data” (hereinafter referred to as the Personal Data Law) and determines the basic principles, objectives, conditions and methods of personal data processing, the Operator’s functions in personal data processing, the procedure for personal data processing and measures to ensure personal data security taken by “DNA-Technology”, LLC (hereinafter referred to as the Operator).

1.2. 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.

1.3. This Operator’s policy on personal data processing (hereinafter referred to as the Policy) applies to all information that the Operator may obtain about visitors, users of the website located on the Internet at the following address: [en.dna-technology.clinic](https://en.dna-technology.clinic) (hereinafter referred to as the Website).

1.4. The User in accordance with this Policy is recognized as any physical person who visits the Website and/or uses its functionalities.

1.5. The User gives his/her consent to the Operator’s processing of the User’s personal data independently on the Website, as well as his/her consent to this Policy and the terms of personal information processing specified therein. By placing a “tick” in the box opposite the following “I confirm my consent to the processing of personal data”, the User gives his/her consent to the processing of personal data under the conditions set out in this consent

1.6. The Operator does not verify the reliability of personal data submitted by Users and does not exercise control over their legal capacity. However, the Operator assumes that Users provide true and sufficient personal information on the issues offered in the forms of the Website and keep this information up to date.

### **2. Personal data**

2.1. For the purposes of this Policy, personal data means:

2.1.1. Personal information that the User provides about himself/herself in the process of using the functional capabilities of the Website, including the User’s personal data. Personal data of the User is any information, data that are provided by the User through the Website, which directly or indirectly relate to a certain or defined individual (subject of personal data).

2.2. The Operator does not process personal data concerning political, religious views, race, nationality, etc.

### **3. Principles and purposes of processing Users' personal information**

- 3.1. The processing of personal data shall be carried out on a lawful and fair basis.
- 3.2. 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 allowed.
- 3.3. It is not allowed to merge databases containing personal data processed for purposes incompatible with each other.
- 3.4. The content and scope of processed personal data correspond to the stated purposes of processing. Redundancy of processed personal data in relation to the stated purposes of their processing is not allowed.
- 3.5. When processing personal data, the accuracy of personal data, their sufficiency and, where necessary, relevance in relation to the purposes of personal data processing shall be ensured. The Operator shall take the necessary measures and/or ensure that they are taken to remove or clarify incomplete or inaccurate data.
- 3.6. Storage of personal data is carried out in a form that allows to identify the subject of personal data, not longer than required by the purposes of personal data processing, unless the period of storage of personal data is established by federal law. 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. The Operator collects and stores only the personal information that is necessary for providing access to the Website, receiving and providing information services on the Website.
- 3.7. User's personal data is processed by the Operator for the following purposes:
  - 3.7.1. Providing Users with access to the Website and information services on the Website.
  - 3.7.2. Providing an opportunity to use information services on the Website.
  - 3.7.3. Processing of requests, appeals of Users.
  - 3.7.4. Communications between the Operator and Users of the Website.
  - 3.7.5. Conducting statistical research based on anonymized information provided by Users, analyzing the obtained statistical data, analyzing the results of using the Website.
  - 3.7.6. Informing about other products and services of the Operator and its business partners, providing personalized advertising, optimizing the Operator's mailing of advertising messages. Distribution of information messages via e-mail, as well as via other communication channels available to the Operator.
  - 3.7.7. Protection against fraud and abuse.

### **4. Conditions of personal data processing**

- 4.1. Processing of personal data shall be carried out with the consent of the personal data subject to the processing of his/her personal data, unless otherwise provided for by the legislation of the Russian Federation.
- 4.2. Access to the processed personal data is allowed only to the Operator's employees.

4.3. The Operator shall not disclose or disseminate personal data to third parties without the consent of the subject of personal data, unless otherwise provided for by the legislation of the Russian Federation.

4.4. Processing of personal data is necessary for realization of rights and legitimate interests of the Operator or third parties or for achievement of socially important goals, provided that the rights and freedoms of the subject of personal data are not violated.

4.5. The Operator, with the consent of the personal data subject, has the right to entrust the processing of personal data to another person on the basis of a contract concluded with this person. The contract shall contain a list of information on personal data to be processed by the person performing the processing of personal data, the purposes of processing, the obligation of such person to maintain confidentiality of personal data and ensure security of personal data during processing, as well as the requirements for personal data protection stipulated by the Personal Data Law.

## **5. List of actions with personal data and methods of their processing**

5.1. The list of actions carried out by the Operator with personal data of Users: collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data. The Operator processes personal information of Users in accordance with this Privacy Policy.

5.2. The Operator processes the following types of data about the Website Users:

5.2.1. Data independently entered/provided by Users when filling in information, forms on the Website, receiving and providing information services on the Website, sending messages, requests, etc. Such personal data may include: surname, first name, patronymic, date, month and year of birth, profession, telephone number, e-mail address, messengers, photographic images, etc.

5.2.2. Technical data about your device and Internet connection, such as browser and operating system data, IP address, location data, cookies, date and time of access to the Website, addresses of requested pages.

5.3. The Operator shall process personal data in the following ways:

5.3.1. Non-automated processing of personal data;

5.3.2. Automated processing of personal data with or without transmission of received information via information and telecommunication networks;

5.3.3. Mixed processing of personal data.

5.4. The User's personal information shall be kept confidential, except for cases when the User voluntarily provides information about himself/herself for public access to an unlimited number of persons. In case the User uses certain functionalities of the Website (for example, writing a review, etc.), the User agrees that a certain part of his/her personal information becomes publicly available.

5.5. The Operator has the right to transfer the User's personal information to third parties in the following cases:

5.5.1. The User has consented to such actions;

5.5.1.2. Transfer is necessary for the User to use a certain service on the Website;

5.5.1.3. The transfer of personal data is provided for in accordance with the requirements of the legislation of the Russian Federation.

5.6. Processing of the User's personal data is carried out until the User revokes his/her consent to the processing of personal data or until the expiration of the processing terms established by law. Personal data of Users shall be processed in any lawful manner with or without the use of automation tools.

5.7. When processing personal data, the Operator shall take the following measures necessary to ensure fulfillment of obligations stipulated by the legislation of the Russian Federation:

5.7.1. Obtain the User's consent to the processing of his/her personal data, except for cases provided for by the legislation of the Russian Federation.

5.7.2. In case of loss or disclosure of personal data, inform the User about the loss or disclosure of personal data and fulfills other requirements established by the legislation of the Russian Federation in connection with the occurrence of such event.

5.7.3. Take necessary organizational and technical measures to protect the User's personal information from illegal or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

5.7.4. Together with the User, take all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the User's personal data.

5.7.5. Adopt local normative acts and other documents in the field of personal data processing and protection.

5.7.6. Store material carriers of personal data in compliance with the conditions ensuring the safety of personal data and excluding unauthorized access to them.

5.7.7. Exercise internal control over compliance of personal data processing carried out by the Operator with the requirements of the Law on Personal Data and other regulatory acts adopted together with it.

5.7.8. Take other measures provided for by the legislation of the Russian Federation in the field of personal data.

## **6. Rights and obligations**

6.1. The User has the right to:

6.1.1. Receive information related to the processing of his/her personal data, except for cases provided for by federal laws. Information is provided to the User by the Operator in an accessible form, it should not contain personal data related to other subjects of personal data, except for cases when 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;

6.1.2. Require the Operator to clarify his personal data, block or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as to take measures provided for by law to protect his rights;

6.1.3. Withdraw consent to the processing of personal data, as well as to send a request to stop processing of personal data;

6.1.4. 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;

6.1.5. Exercise other rights provided for by the legislation of the Russian Federation.

#### 6.2. The User is obliged to:

6.2.1. Provide reliable information about personal data necessary for using the Website, as well as for other purposes specified in this Policy.

#### 6.3. The Operator has the right to:

6.3.1. Obtain from the personal data subject reliable information and/or documents containing personal data;

6.3.2. In case the User revokes his/her consent to the processing of personal data, as well as in case the User submits a request to stop the processing of personal data, the Operator has the right to continue the processing of personal data without the consent of the personal data subject if there are grounds specified in the Personal Data Law;

6.3.3. Independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment 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.

#### 6.4. The Operator is obliged to:

6.4.1. Process personal data of Users exclusively for the purposes specified in this Policy.

6.4.2. Ensure proper storage of confidential information, do not sell, exchange, publish or otherwise disclose the transferred personal data of the User, except as provided for in this Policy.

6.4.3. Take precautionary measures to protect the confidentiality of the User's personal data according to the procedure usually used to protect such information in the existing business turnover

6.4.4. Based on the User's written request to stop processing of personal data, the Operator shall stop processing such data within 30 (thirty) calendar days.

## **7. Responsibility**

7.1. The Operator who fails to fulfill its obligations shall be liable for losses incurred by the User due to unauthorized use of personal data in accordance with the legislation of the Russian Federation.

7.2. In case of loss or disclosure of confidential information, the Operator shall not be liable if this confidential information:

7.2.1. Became public before its loss or disclosure.

7.2.2. Was received from a third party prior to its receipt by the Operator.

7.2.3. Was disclosed with the User's consent.

7.3. Persons who provided the Operator with inaccurate 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. The user who provided false personal data shall reimburse the Operator for losses incurred in connection with this.

## **8. Dispute resolution**

8.1. Before filing a lawsuit on disputes arising from the relations between the User and the Operator, it is obligatory to submit a claim (a written proposal for voluntary dispute settlement).

8.2. Within 30 calendar days from the date of receipt of the claim, the recipient of the claim shall notify the claimant in writing of the results of the claim review.

8.3. In case of failure to reach an agreement, the dispute will be referred to the court for consideration in accordance with the current legislation of the Russian Federation.

8.4. The current legislation of the Russian Federation shall apply to this Privacy Policy and relations between the User and the Operator.

## **9. Additional terms and conditions**

9.1. The current version of the Policy is freely available on the Internet at the following address: <https://dna-technology.ru/sites/default/files/policy.pdf>

9.2. The Operator has the right to make changes to this Privacy Policy without the User's consent. The Policy is valid indefinitely.

9.3. The new version of the Privacy Policy comes into effect from the moment of its placement on the Website, unless otherwise provided by the new version of the Policy. The User shall independently monitor changes to the Policy.

9.4. The User may obtain any clarifications on the issues of interest regarding the processing of his/her personal data by contacting the Operator via e-mail [mail@dna-technology.ru](mailto:mail@dna-technology.ru)