

# PERSONAL DATA PROCESSING POLICY

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## ON THE WEBSITE [HTTPS://BRICS-PAY.COM](https://brics-pay.com)

Date of Policy update

October 11, 2024

[policy@brics-pay.com](mailto:policy@brics-pay.com)

### 1. GENERAL PROVISIONS

1.1. This personal data processing policy has been drawn up in accordance with the requirements of the national "On personal data" (hereinafter referred to as the Personal Data Law) laws and determines the procedure for processing personal data and measures to ensure the security of personal data taken by BRICS PAY CONSORTIUM (hereinafter referred to as the Operator). In each country, the operator may be an authorized company.

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

1.3. This Operator policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator can receive about visitors to the website <https://brics-pay.com>

### 2. BASIC CONCEPTS USED IN THE POLICY

2.1. Automated processing of personal data – processing of personal data using computer technology.

2.2. Blocking of personal data – temporary cessation of processing of personal data (except for cases when processing is necessary to clarify personal data).

2.3. Website – a set of graphic and information materials, as well as computer programs and databases that ensure their availability on the Internet at the network address <https://brics-pay.com>.

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

2.5. Depersonalization of personal data – actions as a result of which it is impossible to determine without the use of additional information the ownership of personal data by a specific User or another subject of personal data.

2.6. Personal data processing – any action (operation) or set of actions (operations) performed with or without the use of automation 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. Operator – Digital Payments Limited Liability Company, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, the composition of personal data subject to processing, actions (operations) performed with personal data.

2.8. Personal data – any information related directly or indirectly to a specific or determinable User of the website <https://brics-pay.com>.

2.9. Personal data permitted for distribution by the personal data subject – personal data, access to which by an unlimited number of persons is granted by the personal data subject by giving consent to the processing of personal data permitted by the personal data subject for distribution in the manner prescribed by the Law on Personal Data (hereinafter – personal data permitted for distribution).

2.10. User – any visitor to the website <https://brics-pay.com>.

2.11. Provision of personal data – actions aimed at disclosing personal data to a specific person or a specific group of persons.

2.12. Distribution of personal data – 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 disclosure of personal data in the media, posting in information and telecommunication networks or providing access to personal data in any other way.

2.13. Personal data subject – an individual to whom the personal data directly or indirectly relates.

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

2.15. Destruction of personal data – any actions as a result of which personal data are irrevocably destroyed with the impossibility of further restoration of the content of personal data in the personal data information system and/or tangible media of personal data are destroyed.

2.16. Cookies – small text files or fragments of information that are transferred to the browser of the Personal Data Subject and stored on the equipment of the Personal Data Subject when visiting a website, such as:

- source of entry to the website;
- IP and MAC addresses;
- browser identifier – Client ID, browser version;
- location information (geolocation data);
- device type;
- information about the device operating system;
- screen resolution;
- interface language, etc.;
- session parameters, including the date and time of access to the website;
- information about user actions on the website, including user clicks, addresses of requested pages, impressions and page views;
- data characterizing audience segments, including using metric programs.

Information about the use of the website is stored in a cookie file and is retrieved from there when the personal data subject revisits the website, which will allow the Operator to identify the personal data subject during his/her subsequent visits to the website and personalize the services provided by the Operator on the website to the specific needs of the personal data subject.

### **3. PRINCIPLES OF PERSONAL DATA PROCESSING**

3.1. Personal data shall be processed in a lawful and fair manner.

3.2. Personal data shall be limited to achieving specific, predetermined and lawful purposes. Processing of personal data that is incompatible with the purposes of collecting personal data shall not be permitted.

3.3. Combining databases containing personal data that are processed for purposes that are incompatible with each other shall not be permitted.

3.4. Only personal data that meet the purposes of their processing shall be processed.

3.5. The content and volume of personal data processed shall correspond to the stated purposes of processing. Excessive processing of personal data in relation to the stated purposes of their processing shall not be permitted.

3.6. When processing personal data, the accuracy of personal data, their sufficiency and, where necessary, relevance in relation to the purposes of processing personal data shall be ensured. The Operator shall take the necessary measures and/or ensure their adoption to delete or clarify incomplete or inaccurate data.

3.7. Personal data shall be stored in a form that allows the subject of personal data to be identified, no longer than required by the purposes of processing personal data, unless the storage period of personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor. Processed personal data shall be destroyed or depersonalized upon achieving the purposes of processing or in the event of loss of the need to achieve these purposes, unless otherwise provided by federal law.

#### **4. PURPOSES OF PERSONAL DATA PROCESSING**

4.1. The purposes, categories, list, methods and term of personal data processing are specified below:

Website visitors:

1. Purpose: Ensuring the functioning of the website (collection and analysis of information about website visitors). Categories and list:

Other categories of personal data:

- Information collected by means of metric programs;
- IP and MAC addresses;
- cookies.

Processing method: Automated. Processing term: Until the purpose of personal data processing is achieved.

2. Purpose: Carrying out business communications (responding to requests). Categories of personal data: Email address. Processing method: Automated. Processing term: Until the purpose of personal data processing is achieved.

#### **5. BASIC RIGHTS AND OBLIGATIONS OF THE OPERATOR**

5.1. The Operator has the right to:

- receive reliable information and/or documents containing personal data from the personal data subject;
- in the event that the personal data subject revokes consent to the processing of personal data, as well as sends an application with a request to stop the processing of personal data, the Operator has the right to continue processing personal data without the consent of the personal data subject if there are grounds specified in the Personal Data Law;
- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations stipulated by the Personal Data Law and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws.

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

- provide the personal data subject, at his request, with information regarding the processing of his personal data;
- organize the processing of personal data in the manner established by the current legislation of the Russian Federation;
- respond to inquiries and requests from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
- notify the authorized body for the protection of the rights of personal data subjects, upon request of this body, of the necessary information within 10 days from the date of receipt of such request;
- publish or otherwise provide unlimited access to this Policy regarding the processing of personal data;
- take legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data;
- stop the transfer (distribution, provision, access) of personal data, stop processing and destroy personal data in the manner and cases stipulated by the Law on Personal Data;
- fulfill other obligations stipulated by the Law on Personal Data.

## 6. BASIC RIGHTS AND OBLIGATIONS OF PERSONAL DATA SUBJECTS

6.1. The personal data subject has the right to:

- receive information regarding the processing of his personal data, except for cases stipulated by federal laws. Information is provided to the personal data subject by the Operator in an accessible form, and it must not contain personal data related to other personal data subjects, except for cases where there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Law on Personal Data;
- demand that the operator clarify his personal data, block or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, and also take measures provided by law to protect his rights;
- put forward a condition of prior consent when processing personal data for the purpose of promoting goods, works and services on the market;
- revoke consent to the processing of personal data, as well as send a request to stop the processing of personal data;
- appeal to the authorized body for the protection of the rights of personal data subjects or in court against the illegal actions or inaction of the Operator when processing his personal data;
- to exercise other rights provided for by the legislation of the Russian Federation.

6.2. Personal data subjects are obliged to:

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

6.3. Persons who have transferred to the Operator inaccurate information about themselves, or information about another personal data subject without the consent of the latter, are liable in accordance with the legislation of the Russian Federation.

## **7. TERMS OF PERSONAL DATA PROCESSING**

7.1. Personal data shall be processed with the consent of the personal data subject to the processing of his/her personal data.

7.2. Personal data shall be processed to achieve the goals stipulated by an international treaty of the Russian Federation or by law for the exercise of the functions, powers and duties imposed on the operator by the legislation of the Russian Federation.

7.3. Personal data shall be processed to administer justice, execute a judicial act, an act of another body or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings.

7.4. Personal data shall be processed to execute an agreement to which the personal data subject is a party, beneficiary or guarantor, as well as to conclude an agreement on the initiative of the personal data subject or an agreement under which the personal data subject will be a beneficiary or guarantor.

7.5. Personal data shall be processed to exercise the rights and legitimate interests of the operator or third parties, or to achieve socially significant goals, provided that the rights and freedoms of the personal data subject are not violated.

7.6. The processing of personal data is carried out, access to which by an unlimited number of persons is provided by the subject of personal data or at his request (hereinafter referred to as publicly available personal data). 7.7. The processing of personal data is carried out that is subject to publication or mandatory disclosure in accordance with federal law.

## **8. PROCEDURE FOR COLLECTING, STORING, TRANSFERRING AND OTHER TYPES OF PROCESSING PERSONAL DATA**

8.1. The security of personal data processed by the Operator is ensured by implementing legal, organizational and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection. The Operator ensures the safety of personal data and takes all possible measures to prevent unauthorized persons from accessing personal data.

8.2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to compliance with current legislation or if the subject of personal data has given consent to the Operator to transfer data to a third party for the fulfillment of obligations under a civil law contract.

8.3. In the event that inaccuracies are detected in the personal data, the User can update them independently by sending the Operator a notification to the Operator's e-mail address [policy@brics-pay.com](mailto:policy@brics-pay.com) with the subject line "Updating personal data".

8.4. The period for processing personal data is determined by the achievement of the purposes for which the personal data were collected, unless another period is provided for by the agreement or applicable law.

8.5. All information collected by third-party services, including payment systems, communication tools and other service providers, is stored and processed by the specified persons (Operators) in accordance with their User Agreement and/or Personal Data Processing Policy (Privacy Policy). The Operator is not responsible for the actions of third parties, including the service providers specified in this clause.

8.6. The prohibitions established by the subject of personal data on the transfer (except for providing access), as well as on the processing or conditions of processing (except for obtaining access) of personal data permitted for distribution, do not apply in cases of processing personal data in state, public and other public interests determined by the legislation of the Russian Federation.

8.7. The Operator ensures the confidentiality of personal data when processing personal data.

8.8. The operator shall store personal data in a form that allows the identification of the subject of personal data for no longer than is required by the purposes of processing personal data, unless the storage period of personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor.

8.9. The condition for termination of personal data processing may be the achievement of the purposes of personal data processing, expiration of the consent of the subject of personal data, withdrawal of consent by the subject of personal data or a requirement to terminate the processing of personal data, as well as the detection of unlawful processing of personal data.

## **9. LIST OF ACTIONS PERFORMED BY THE OPERATOR WITH THE RECEIVED PERSONAL DATA**

9.1. The Operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes and destroys personal data.



9.2. The Operator carries out automated processing of personal data with or without receiving and/or transmitting the received information via information and telecommunications networks.

## **10. CROSS-BORDER TRANSFER OF PERSONAL DATA**

10.1. Before starting activities related to the cross-border transfer of personal data, the operator is obliged to notify the authorized body for the protection of the rights of personal data subjects of its intention to carry out the cross-border transfer of personal data (such notification is sent separately from the notification of the intention to process personal data).

10.2. Before submitting the above notification, the operator is obliged to obtain relevant information from the authorities of the foreign state, foreign individuals, and foreign legal entities to whom the cross-border transfer of personal data is planned.

## **11. CONFIDENTIALITY OF PERSONAL DATA**

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

## **12. CONSENT TO THE PROCESSING OF PERSONAL DATA**

12.1. By accepting the terms of this Policy, the User voluntarily, of his own free will and in his own interests provides the Operator with his personal data and gives his consent to their processing in accordance with the terms of this Policy, and also confirms that the personal data provided by him is reliable. The Operator assumes that the User provides reliable personal data and keeps it up to date.

12.2. By filling in the data fields provided on the website and/or sending his personal data to the Operator, the User accepts this Policy and gives his consent to the processing of his personal data for the purposes, in the ways and on the terms specified in this Policy.

12.3. By accepting the terms of this Policy, the User declares that he is aware of his 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.

12.4. By using the website, you agree unconditionally to this Policy and the terms and conditions for processing your personal information specified therein. If you do not agree with these terms, you must refrain from using the website.

12.5. The User may revoke their consent to the processing of personal data at any time by sending the Operator a notice via e-mail to the Operator's e-mail address [policy@brics-pay.com](mailto:policy@brics-pay.com) with the subject line "Revocation of consent to the processing of personal data".

12.6. Most browsers automatically accept cookies. If the User has approved the use of cookies but later wants to change their mind, they can do so by deleting the saved cookies in the browser's system settings at any time. The User can change their browser settings to accept or reject all cookies by default or cookies from specific sites, including the <https://brics-pay.com> website. Each browser is different, so more detailed information about cookie settings is provided in the help section of the User's browser.

12.7. If you delete cookies and/or configure your web browser so that new cookies are not saved, some or all of the website's features may not be available. In the latter case, the Operator shall not be liable for the inability to use the website's features or the inability to use/provide services.

12.8. If the website user does not agree to the use of Internet statistics and settings methods, tools and instruments, he/she must stop using the website.

### **13. FINAL PROVISIONS**

13.1. The User may obtain any clarifications on issues of interest regarding the processing of his/her personal data by contacting the Operator via e-mail [policy@brics-pay.com](mailto:policy@brics-pay.com).

13.2. This document will reflect any changes to the Operator's personal data processing policy. The Policy is valid indefinitely until it is replaced by a new version.

13.3. By continuing to use the website, the subject of personal data confirms consent to the changes made to the Policy.

13.4. The current version of the Policy is freely available on the Internet at <https://brics-pay.com>.