Personal Data Processing Policy

1. General Provisions

This Personal Data Processing Policy has been drawn up in accordance with the requirements of Federal Law No. 152-FZ “On Personal Data” dated 27.07.2006 (hereinafter, the “Personal Data Law”) and defines the procedure for processing personal data and the measures taken by jetybox (hereinafter, the “Operator”) to ensure the security of personal data.

1.1. The Operator regards observance of human and civil rights and freedoms in the processing of personal data — including the protection of the right to privacy, personal and family secrets — as the most important goal and condition for carrying out its activities.

1.2. This Policy of the Operator regarding the processing of personal data (hereinafter, the “Policy”) applies to all information that the Operator may obtain about visitors of the website https://jetybox.com.

2. Basic Terms Used in the Policy

2.1. Automated processing of personal data — processing of personal data by means of computer technology.

2.2. Blocking of personal data — temporary suspension of the processing of personal data (except where processing is necessary to clarify personal data).

2.3. Website — a set of graphic and informational materials, as well as computer programs and databases, that ensure their availability on the internet at the network address https://jetybox.com.

2.4. Personal data information system — a set of personal data contained in databases, and the information technologies and technical means ensuring their processing.

2.5. Depersonalization of personal data — actions as a result of which it becomes impossible, without the use of additional information, to determine the ownership of personal data by a specific User or other subject of personal data.

2.6. Processing of personal data — 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), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data.

2.7. Operator — a state authority, municipal authority, legal entity or individual, organizing and/or carrying out the processing of personal data independently or jointly with others, and determining the purposes of processing personal data, the composition of personal data to be processed, and the actions (operations) performed with personal data.

2.8. Personal data — any information relating directly or indirectly to an identified or identifiable User of the website https://jetybox.com.

2.9. Personal data permitted for distribution by the data subject — personal data to which access by an unlimited number of persons is granted by the data subject through consent to the processing of personal data permitted for distribution, in the manner provided for by the Personal Data Law (hereinafter, “personal data permitted for distribution”).

2.10. User — any visitor of the website https://jetybox.com.

2.11. Provision of personal data — actions aimed at disclosing personal data to a certain person or a

certain group of persons.

2.12. Distribution of personal data — any actions aimed at disclosing personal data to an indefinite group of persons (transfer of personal data) or at familiarizing an unlimited number of persons with personal data, including the disclosure of personal data in the media, posting it on information and telecommunication networks, or providing access to personal data in any other way.

2.13. Cross-border transfer of personal data — transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual, or a foreign legal entity.

2.14. Destruction of personal data — any actions as a result of which personal data is irretrievably destroyed with no possibility of further restoring its content in the personal data information system and/or the physical media containing personal data is destroyed.

3. Basic Rights and Obligations of the Operator

3.1. The Operator has the right to:

— receive from the data subject reliable information and/or documents containing personal data;

— if the data subject withdraws consent to the processing of personal data, or submits a request to stop processing personal data, continue processing personal data without the subject's consent where grounds set out in the Personal Data Law exist;

— independently determine the composition and list of measures necessary and sufficient to ensure compliance with the obligations set out in the Personal Data Law and regulations adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws.

3.2. The Operator is obliged to:

— provide the data subject, at their request, with information concerning the processing of their personal data;

— organize the processing of personal data in accordance with the procedure established by current Russian legislation;

— respond to requests and inquiries from data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;

— report to the authorized body for the protection of the rights of personal data subjects, upon its request, the necessary information within 10 days of receiving such a request;

— publish or otherwise ensure unrestricted access to this Personal Data Processing Policy;

— take legal, organizational and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, copying, provision, distribution of personal data, and from other unlawful actions in respect of personal data;

— stop the transfer (distribution, provision, access) of personal data, stop processing and destroy personal data in the manner and cases provided for by the Personal Data Law;

— perform other duties provided for by the Personal Data Law.

4. Basic Rights and Obligations of Personal Data Subjects

4.1. Personal data subjects have the right to:

— receive information concerning the processing of their personal data, except in cases provided for

by federal laws. Such information is provided to the data subject by the Operator in an accessible form and must not contain personal data relating to other data subjects, except where there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Personal Data Law;

— require the Operator to clarify their personal data, block it, or destroy it if the personal data is incomplete, outdated, inaccurate, unlawfully obtained, or is not necessary for the stated purpose of processing, and to take measures provided by law to protect their rights;

— set a condition of prior consent when processing personal data for the purposes of promoting goods, works and services on the market;

— withdraw consent to the processing of personal data, and submit 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 to a court, against unlawful actions or omissions of the Operator in the processing of their personal data;

— exercise other rights provided for by Russian legislation.

4.2. Personal data subjects are obliged to:

— provide the Operator with reliable information about themselves;

— notify the Operator of any clarification (update, modification) of their personal data.

4.3. Persons who have provided the Operator with unreliable information about themselves, or information about another data subject without the latter’s consent, are liable in accordance with Russian legislation.

5. Principles of Personal Data Processing

5.1. The processing of personal data is carried out on a lawful and fair basis.

5.2. The processing of personal data is limited to achieving specific, predetermined and legitimate purposes. Processing of personal data that is incompatible with the purposes of its collection is not permitted.

5.3. The merging of databases containing personal data processed for mutually incompatible purposes is not permitted.

5.4. Only personal data that meets the purposes of its processing is subject to processing.

5.5. The content and scope of the personal data processed correspond to the stated purposes of processing. Excessive personal data in relation to the stated purposes of its processing is not permitted.

5.6. When processing personal data, the accuracy of the personal data, its sufficiency, and, where necessary, its relevance to the purposes of processing are ensured. The Operator takes the necessary measures and/or ensures that they are taken to delete or clarify incomplete or inaccurate data.

5.7. Personal data is stored in a form that allows the data subject to be identified, for no longer than required by the purposes of processing, unless the storage period is established by federal law or by an agreement to which the data subject is a party, beneficiary, or guarantor. Processed personal data is destroyed or depersonalized once the purposes of processing are achieved, or if it is no longer needed to achieve those purposes, unless otherwise provided by federal law.

6. Purposes of Personal Data Processing

Purpose of processing	Informing the User by sending emails
Personal data	Last name, first name, patronymic Email address Phone numbers
Legal grounds	Federal Law “On Information, Information Technologies and Information Protection” No. 149-FZ dated 27.07.2006
Types of processing	Collection, recording, systematization, accumulation, storage, destruction and depersonalization of personal data Sending informational emails to the email address

7. Conditions for the Processing of Personal Data

7.1. The processing of personal data is carried out with the consent of the data subject to the processing of their personal data.

7.2. The processing of personal data is necessary to achieve purposes provided for by an international treaty of the Russian Federation or by law, or to perform functions, powers and duties assigned to the Operator by Russian legislation.

7.3. The processing of personal data is necessary for the administration of justice, the enforcement of a judicial act, an act of another body or official, subject to enforcement in accordance with Russian legislation on enforcement proceedings.

7.4. The processing of personal data is necessary for the performance of an agreement to which the data subject is a party, beneficiary, or guarantor, as well as for concluding an agreement at the initiative of the data subject or an agreement under which the data subject will be a beneficiary or guarantor.

7.5. The processing of personal data is necessary to exercise the rights and legitimate interests of the Operator or third parties, or to achieve socially significant purposes, provided that the rights and freedoms of the data subject are not violated.

7.6. Processing is carried out of personal data to which access by an unlimited number of persons is granted by the data subject or at their request (hereinafter, “publicly available personal data”).

7.7. Processing is carried out of personal data subject to publication or mandatory disclosure in accordance with federal law.

8. Procedure for the Collection, Storage, Transfer and Other Processing of Personal Data

The security of personal data processed by the Operator is ensured through the implementation of legal, organizational and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.

8.1. The Operator ensures the safety of personal data and takes all possible measures to exclude access to personal data by unauthorized persons.

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 where the data subject has given the Operator consent to transfer data to a third party for the performance of obligations under a civil-law agreement.

8.3. If inaccuracies are found in the personal data, the User may update it independently by sending the

Operator a notice to the email address info@jetybox.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 was collected, unless a different period is provided for by an agreement or current legislation. The User may withdraw their consent to the processing of personal data at any time by sending the Operator a notice by email to info@jetybox.com with the subject line “Withdrawal of consent to the processing of personal data”.

8.5. All information collected by third-party services, including payment systems, communication tools and other service providers, is stored and processed by those persons (Operators) in accordance with their own User Agreement and Privacy Policy. The data subject should familiarize themselves with those documents. The Operator is not responsible for the actions of third parties, including the service providers referred to in this clause.

8.6. Prohibitions established by the data subject on the transfer (other than granting access), processing, or the terms of processing (other than granting access) of personal data permitted for distribution do not apply in cases where personal data is processed in state, public, or other public interests as defined by Russian legislation.

8.7. When processing personal data, the Operator ensures the confidentiality of personal data.

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

8.9. The processing of personal data may be terminated upon achievement of the purposes of processing, expiration of the data subject’s consent, withdrawal of consent by the data subject, a request to stop processing, or the discovery of unlawful processing of personal data.

9. List of Actions Performed by the Operator with the Personal Data Received

9.1. The Operator carries out the collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion and destruction of personal data.

9.2. The Operator carries out automated processing of personal data, with or without the receipt and/or transfer of the information obtained via information and telecommunication networks.

10. Cross-Border Transfer of Personal Data

10.1. Before commencing 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 a cross-border transfer of personal data (such notice is submitted separately from the notice of intent to process personal data).

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

11. Confidentiality of Personal Data

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

12. Final Provisions

12.1. The User may obtain any clarifications on matters of interest concerning the processing of their personal data by contacting the Operator by email at info@jetybox.com.

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

12.3. The current version of the Policy is freely available on the internet at https://jetybox.com.