



Policy on personal data processing

1. General Provisions

This policy on personal data processing is drawn up in accordance with the requirements of Federal Law No. 152-FZ “On Personal Data” of 27.07.2006 (hereinafter referred to as the Personal Data Law) and defines the procedure for processing personal data and measures to ensure the security of personal data taken by ANO “Organising Committee “World Friendship Games” (hereinafter referred to as the Operator).

1.1. The Operator establishes as a primary goal and condition for the performance of its activities the observance of human and civil rights and freedoms in relation to the personal data processing, including the protection of the sanctity of private life and personal and family privacy.

1.2. This document, the Operator’s policy on personal data processing (hereinafter referred to as the Policy) applies to all information that the Operator may obtain about visitors to the website <https://wfg2024.com>

2. Definitions of the main terms used in the Policy

2.1. “Automated personal data processing” means personal data processing with the help of computer technology.

2.2. “Blocking of personal data” means the temporary cessation of personal data processing (except in cases where processing is necessary to clarify personal data).

2.3. “Website” means a compilation of graphic images and text materials, as well as the software and databases used to make such materials available on the Internet at the following address: <https://wfg2024.com>

2.4. “Personal data information system” means a set of personal data contained in databases, and the information technology and technical equipment used in the processing of such data.

2.5. “Depersonalisation of personal data” means actions making it impossible to determine, without using additional information, the identity of the User or other personal data subject to whom personal data relates.

2.6. “Personal data processing” means any action or operation, or set of actions or operations performed in relation to personal data, whether or not performed using automation technology, including its collection, recording, systematisation, accumulation, storage, clarification (updating or changing), extraction, use, transfer (dissemination, provision or access), depersonalisation, blocking, deletion or destruction.

2.7. “Operator” means a state authority, municipal authority, legal entity or individual which independently or jointly with other persons organises and/or carries out the personal data processing, and determines the purposes of personal data processing, decides which personal data will be processed and the actions (operations) to be performed with the personal data.

2.8. “Personal data” means any information relating directly or indirectly to a specific or identifiable User of the website <https://wfg2024.com>

2.9. “Personal data for which the data subject has authorised the dissemination” means personal data to which the personal data subject grants access to an unlimited number of persons by

giving data processing consent for which the personal data subject has authorised the dissemination, as prescribed by the Personal Data Law (hereinafter referred to as the Personal data authorised for dissemination).

2.10. “User” means any visitor to the website <https://wfg2024.com>

2.11. “Provision of personal data” means actions taken in order to disclose personal data to a certain person or group of persons.

2.12. “Dissemination of personal data” means any actions aimed at disclosing personal data to an indefinite number of persons (transfer of personal data) or allowing an unlimited number of persons to view such data, including the publication of personal data in mass media or over information and telecommunication networks or providing access to it any other way.

2.13. “Cross-border transfer of personal data” means the transfer of personal data to a location in a foreign country, or to a foreign government authority, a foreign individual or a foreign legal entity.

2.14. “Destruction of personal data” means any actions as a result of which personal data is irretrievably destroyed, thus making it impossible in the future to recover the content of the personal data in the personal data information system, and/or the media in which the personal data is held are destroyed.

3. Main rights and obligations of the Operator

3.1. The Operator may:

- obtain reliable information and/or documents containing personal data from the personal data subject;
- if the personal data subject withdraws his/her personal data processing consent, or if he/she submits a request to discontinue personal data processing, the Operator may continue to process the personal data without the consent of the personal data subject if the grounds for such processing specified in the Personal Data Law apply;
- independently determine the composition and list of measures necessary and sufficient to ensure the fulfilment of the obligations stipulated by the Personal Data Law and the legal instruments adopted in accordance therewith, unless otherwise provided by the Personal Data Law or other federal laws.

3.2. The Operator shall:

- provide the personal data subject, upon his/her request, with information regarding the processing of his/her personal data;
- organise personal data processing in accordance with the procedure established by the applicable laws of the Russian Federation;
- respond to questions and requests from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
- upon a request by the authorised body responsible for the protection of personal data subjects' rights, provide to such body the required information within 10 days from the date of receipt of such request;



- publish or otherwise provide unrestricted access to this Policy on the personal data processing;
- take legal, organisational and technical measures to prevent the unlawful or accidental access, destruction, modification, blocking, copying, provision to another person or dissemination of personal data, as well as any other unlawful actions in relation to personal data;
- discontinue the transfer of (dissemination of, provision to another person of or access to) personal data, discontinue the processing and destroy personal data in the manner and cases stipulated by the Personal Data Law;
- fulfil other obligations stipulated by the Personal Data Law.

4. Main rights and obligations of personal data subjects

- 4.1. Personal data subjects may:
- receive information regarding the processing of his/her personal data, except in cases provided for by federal laws. Information shall be provided to the personal data subject by the Operator in an accessible form and shall not contain personal data relating to other personal data subjects, unless there are legitimate grounds for disclosure of such personal data. The list of such information and the procedure for obtaining it is set out in the Personal Data Law;
 - request the Operator to clarify his/her personal data or block or destroy it if the personal data is incomplete, outdated, inaccurate, was illegally obtained or if it is not required for the stated purpose of the processing, and also to take the measures specified by law to protect his/her rights;
 - impose a condition of prior consent before processing personal data for the purpose of marketing goods, works and services;
 - withdraw his/her personal data processing consent, and request the Operator to discontinue the personal data processing;
 - appeal to the authorised body responsible for the protection of personal data subjects' rights or bring legal action in the courts against illegal actions or omissions of the Operator in relation to the processing of his/her personal data;
 - exercise other rights stipulated by the legislation of the Russian Federation.

4.2. Personal data subjects shall:

- provide the Operator with reliable information about themselves;
- notify the Operator about the clarification (updating, changing) of their personal data.

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

5. Principles of personal data processing

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

5.2. The personal data processing is limited to actions necessary to achieve specific, predefined



and legitimate purposes. Any personal data processing which is incompatible with the purposes of the personal data collection is not allowed.

5.3. Databases containing personal data processed for mutually incompatible purposes may not be merged.

5.4. Only personal data that meets the purposes for which it is processed may be processed.

5.5. The content and scope of the processed personal data must correspond to the stated purposes of processing. The personal data processed may not exceed the amount necessary to achieve the stated purposes of the data processing.

5.6. When processing personal data, measures must be taken to ensure that the data is accurate, sufficient, and, where necessary, relevant to the purposes of the personal data processing. The Operator shall take the necessary measures to remove or clarify incomplete or inaccurate data, and/or ensure that such measures are taken.

5.7. Personal data shall be stored in a form that allows the identification of the personal data subject for no longer than required for the purposes of the personal data processing, unless a longer period is established by federal law, a contract to which the personal data subject is a party, a beneficiary or a guarantor. Once the purposes of the personal data processing have been achieved, or if it is no longer necessary to achieve those processes, the processed personal data shall be destroyed or anonymised, unless otherwise provided for by federal law.

6. Purposes of personal data processing

6.1. Purpose of processing:

- sending information updates to the User by e-mail

Personal Data:

- surname, first name, patronymic
- e-mail
- telephone
- place of work

Legal Basis:

- contracts concluded between the Operator and the personal data subject

Types of personal data processing:

- collection, recording, systematisation, accumulation, storage, destruction and depersonalisation of personal data
- sending newsletters to an e-mail

6.2. Purpose of processing:

- providing the User with access to services, information and/or materials contained on the website

Personal Data:



- surname, first name, patronymic
- e-mail
- telephone
- place of work

Legal Basis:

- contracts concluded between the Operator and the personal data subject

Types of personal data processing:

- collection, recording, systematisation, accumulation, storage, destruction and depersonalisation of personal data
- sending newsletters to an e-mail

7. Conditions of personal data processing

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

7.2. The personal data processing is necessary to achieve the purposes stipulated by an international treaty to which the Russian Federation is a party, or by law, in order to fulfil the functions, powers and duties assigned to the Operator by the laws of the Russian Federation.

7.3. The personal data processing is necessary for the administration of justice, execution of a judicial decision, or decision of another body or official to enforcement in accordance with the law of the Russian Federation on enforcement proceedings.

7.4. The personal data processing is necessary for the execution of an agreement to which the personal data subject is a party, a beneficiary or a guarantor, and also for the conclusion of 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. The personal data processing is necessary for the exercise of the rights and legitimate interests of the Operator or third parties or in order to achieve socially important purposes, provided that the rights and freedoms of the personal data subject are not infringed.

7.6. The processing relates to personal data to which an unlimited number of persons have been given access by the personal data subject or at his/her request (hereinafter referred to as the publicly available personal data).

7.7. The processing relates to personal data which is subject to publication or mandatory disclosure in accordance with federal law.

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

The security of the personal data processed by the Operator is ensured by implementing the legal, organisational and technical measures necessary for full compliance with the requirements of the current law in the field of personal data protection.

8.1. The Operator ensures the safety of the personal data and takes all possible measures to prevent unauthorised persons from accessing the personal data.

8.2. The User's personal data will never, under any circumstances, be transferred to third parties,

except as required by current law or if the personal data subject has given his/her consent to the Operator to transfer the data to a third party for the fulfilment of his/her obligations under a civil law contract.

8.3. If any inaccuracies in the personal data are identified, the User may update the data himself/herself by sending a notification by email to the Operator at info@wfgames.org with the heading “Personal Data Update”.

8.4. The period of personal data processing ends with the achievement of the purposes for which the personal data was collected, unless another period is stipulated by the contract or applicable law.

The User may withdraw his/her personal data processing consent at any time by sending a notice to the Operator by e-mail to the Operator’s e-mail at info@wfgames.org with the heading “Withdrawal of personal data processing consent”.

8.5. All information that is collected by third-party services, including payment systems, communications and other service providers, is stored and processed by these parties (Operators) in accordance with their User Agreement and Privacy Policy. The Operator is not responsible for the actions of third parties, including the service providers mentioned in this paragraph.

8.6. The prohibitions established by the personal data subject on the transfer of personal data authorised for dissemination (other than the granting of access to such data) and on the processing or the conditions for processing of such personal data (other than the receipt of access to such data) shall not apply to the processing of personal data in the interests of the state, society or other public interest as defined by the laws of the Russian Federation.

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

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

8.9. The following may serve as conditions for discontinuing the personal data processing: the achievement of the purposes of personal data processing, the expiry or withdrawal of the personal data processing subject’s consent, an instruction to terminate the personal data processing, or the detection of any unlawful personal data processing.

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

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

9.2. The Operator carries out automated personal data processing, which may or may not include the receiving and/or transferring of the received information via information and telecommunications networks.

10. Cross-border transfer of personal data

10.1. Prior to commencing the cross-border transfer of personal data, the Operator shall notify the authorised body responsible for the protection of personal data subjects’ rights of its intention to



carry out the cross-border transfer of personal data (such notification is sent separately from the notification of intention to carry out personal data processing).

10.2. Before submitting the above notification, the Operator must obtain the relevant information from foreign authorities, foreign natural persons 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 access to personal data may not disclose it to third parties or disseminate it without the consent of the personal data subject, unless otherwise provided by federal law.

12. Final Provisions

12.1. The User may obtain any clarifications on any issues of interest regarding his/her personal data processing by contacting the Operator via e-mail at info@wfgames.org

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

12.3. The current version of the Policy is freely available on the Internet at <https://wfg2024.com>