

Privacy Policy

1. General provisions

This personal data processing policy is based on the requirements of Federal Law No. 152-FZ dated 27.07.2006 on Personal Data and determines the personal data processing procedure and personal data security measures taken by Ivanyan and Partners (*"the Operator"*).

- 1.1 The Operator sets observance of human and civil rights and freedoms during processing of personal data, including protection of rights to personal privacy, as a priority objective and a condition for performing its activities.
- 1.2 The Operator applies this personal data processing policy (*"the Policy"*) to all information it might receive about visitors to the website <https://ivanyan.partners>.

2. Key concepts used in the Policy

- 2.1 Automated processing of personal data – processing of personal data using computer hardware and software;
- 2.2 Blocking of personal data – temporary suspension of personal data processing (unless required for updating personal data);
- 2.3 Website – the aggregate of graphics and information, and the computer software and databases for accessing them online at <https://ivanyan.partners>;
- 2.4 Personal data information system – all the personal data contained in the databases, and the IT and technical devices used for processing them;
- 2.5 Anonymisation of personal data – actions making it impossible for the specific User or other personal data subject to which personal data relate to be identified without additional information;
- 2.6 Processing of personal data – any action, operation or set of actions or operations performed with personal data, with or without means of

automation, including collection, recording, systematisation, accumulation, storage, updating and amendment, extraction, use, transmission (distribution, provision, accessing), anonymisation, blocking, deletion and destruction of personal data;

- 2.7 Operator – a government or municipal body, legal entity or individual, either separately or together with other persons, that arranges and (or) performs personal data processing and determines the purpose of the personal data processing, the composition of the personal data to be processed and the actions (operations) carried out with the personal data;
- 2.8 Personal data – any information relating directly or indirectly to a specific or identifiable User of the website <https://ivanyan.partners>;
- 2.9 User – any visitor to the website <https://ivanyan.partners>;
- 2.10 Provision of personal data – actions performed to disclose personal data to a specific person or group of persons;
- 2.11 Distribution of personal data – any actions performed to disclose personal data to an undetermined group of persons (transfer of personal data) or to acquaint an undetermined group of persons with the personal data, including publication of personal data in the media, posting on information and telecommunications networks or provision of access to personal data by any other means;
- 2.12 Cross-border transfer of personal data – transmission of personal data to the territory of a foreign state, a public authority of a foreign state, a foreign individual or foreign legal entity;
- 2.13 Destruction of personal data – any actions irrevocably destroying personal data making it impossible to restore the personal data content in the personal data information system and (or) destroying tangible personal data media.

3. User personal data include:

- 3.1 Last name, first name, patronymic;

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- 3.2 E-mail address, telephone numbers, other information about any means for contacting the User;
 - 3.3 Year, month, date and place of birth;
 - 3.4 Residential address;
 - 3.5 Photographs;
 - 3.6 Information about education, profession, specialisation and qualifications, details and scanned copies of education documents;
 - 3.7 Information about any degrees or titles;
 - 3.8 Career information;
 - 3.9 Information about automatically collected website-usage parameters (User's IP-address, browser type and version, operating system used, time zone, type of device, other data stored in cookies).

4. Personal data processing purposes and use of cookies

- 4.1 Purposes for processing the User's personal data:
 - a. gathering information about a job candidate to decide whether Ivanyan and Partners should hire them;
 - b. gathering information about website usage parameters for upgrading the website.
- 4.2 Information about website usage parameters (User's IP-address registered when the website is visited, browser type and version, operating system used, time zone, type of device, other data stored in cookies) is gathered with the help of Web statistics services (Yandex Metrica and Google Analytics).

Yandex Metrica and Google Analytics insert cookies into the User's browser to identify them as a unique user on a return visit to the website. The information gathered via cookies is transmitted to Yandex or to Google.

The opportunities for Yandex and Google to use information gathered via Yandex Metrica and Google Analytics and transmit it to third parties

are established in the Yandex and Google Confidentiality Policies, respectively.

5. Basic rights and obligations of the Operator and the User

5.1 Basic rights and obligations of the Operator:

5.1.1 The Operator has the right to delegate personal data processing to a third party with the User's consent unless federal law prescribes otherwise.

5.1.2 The Operator shall undertake the legal, organisational and technical measures required for ensuring Users' personal data security.

5.1.3 The Operator undertakes to respond to Users' enquiries concerning processing of their personal data as per the legislative requirements.

5.2 Basic rights of the User. The User has the right:

5.2.1 to obtain information about processing of their personal data by emailing the Operator on privacy@iplf.ru;

5.2.2 to demand updating of their personal data, blocking and destruction of the personal data if they are incomplete, out of date, imprecise or not required for the declared purpose of the processing;

5.2.3 to revoke their consent to processing of their personal data by emailing the Operator at privacy@iplf.ru marked "Recall of consent to personal data processing". Gathering of information about website usage parameters is prevented by switching off the Google Analytics and Yandex Metrica cookies in the browser.

The User may also refuse information notices by emailing the Operator at privacy@iplf.ru under the heading "Unsubscribe from notices".

6. Legal grounds for personal data processing

Within the scope of the Policy, the Operator processes personal data in performance of and accordance with the following regulations:

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- 6.1 Civil Code of the Russian Federation;
 - 6.2 Labour Code of the Russian Federation;
 - 6.3 Federal Law No. 149-FZ dated 27.07.2006 on Information Technology and Information Security;
 - 6.4 Resolution of the Government of the Russian Federation No. 1119 dated 01.11.2012 on “Approving the requirements on personal data security during their processing within personal data information systems”;
 - 6.5 Resolution of the Government of the Russian Federation No. 687 dated 15.09.2008 on “Approving the Regulations on the specifics of processing personal data without means of automation”;
 - 6.6 Other regulations and legal acts of the Russian Federation, regulations of authorised government bodies and the Operator’s internal policies and procedures.

Consent to personal data processing is also required for personal data processing.

7. Collection, storage, transmission and other types of personal data processing

- 7.1 The Operator processes the User’s personal data listed in items 3.1-3.8 of this Policy if they are entered by the User on special online forms. By completing these forms, the User gives their consent to their personal data being processed in line with this Policy, including by means of cookies.

The Operator processes the website usage parameters, provided this is permitted in the User’s browser settings (cookie saving is allowed).

- 7.2 The Operator processes the User’s personal data both automatically and not automatically.
- 7.3 The personal data may be processed for an unlimited period unless the Russian legislation stipulates otherwise.
- 7.4 The Operator undertakes the requisite legal, organisational and technical measures for ensuring protection of personal data against

unlawful or accidental access, amendment, blocking, distribution or other unsanctioned actions.

- 7.5 If inaccuracies are identified in personal data, the User may update them by emailing the Operator at privacy@iplf.ru under the heading “Update of personal data”.

8. Cross-border transfer of personal data

- 8.1 Prior to cross-border transfer of personal data, the Operator must make sure that the foreign state to which it intends to transfer the personal data provides reliable protection for the rights of personal data subjects.
- 8.2 Cross-border transfer of personal data to foreign states that do not meet the above requirements is permissible only with the User’s written consent and/or for performance of an agreement to which the personal data subject is party.

9. Final provisions

- 9.1 Any changes to the Operator’s privacy policy are made by amending this document. The Policy remains in effect until replaced by a new version.
- 9.2 The latest version of the Policy is freely accessible at <https://ivanyan.partners/en/privacy>.