Policy regarding the processing of personal data

1. **General provisions**

This privacy policy has been drawn up in accordance with the requirements of the Federal Law of July 27, 2006. No. 152-FL (Federal Law) “On Personal Data” (hereinafter referred to as the Law on Personal Data) and determines the procedure for processing personal data and measures to ensure the security of personal data taken by MY CONTAINER LLC (hereinafter referred to as the Operator).

* 1. 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.
  2. This Operator’s policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator can obtain about visitors to the website http://1minskterminal.com/en

1. **Key terms and concepts mentioned in this Privacy Policy**
   1. Automated processing of personal data – processing of personal data using computer technology.
   2. Blocking of personal data – temporary cessation of processing of personal data (except for cases where processing is necessary to clarify personal data).
   3. Website - is a collection of graphic and information materials, as well as computer programs and databases that ensure their availability on the Internet at the network address http://1minskterminal.com/en
   4. Personal data information system - is a set of personal data contained in databases and information technologies and technical means that ensure their processing.
   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 to a specific User or other subject of personal data.
   6. Processing of personal data – any action (operation) or set of actions (operations) performed using automation tools or without the use of such means with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.
   7. Operator - a state body, municipal body, legal or natural person, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.
   8. Personal data – any information relating directly or indirectly to a specific or identified User of the website http://1minskterminal.com/en
   9. Personal data authorized by the subject of personal data for distribution - personal data, access to an unlimited number of persons to which is provided by the subject of personal data by giving consent to the processing of personal data authorized by the subject of personal data for distribution in the manner prescribed by the Law on Personal Data (hereinafter - personal data authorized for distribution).
   10. User – any visitor to the website http://1minskterminal.com/en
   11. Providing personal data – actions aimed at disclosing personal data to a certain person or a certain circle of persons.
   12. Dissemination of personal data - any actions aimed at disclosing personal data to an indefinite number of persons (transfer of personal data) or familiarizing with personal data to an unlimited number of persons, including the publication of personal data in the media, posting in information and telecommunication networks or providing access to personal data in any other way.
   13. Cross-border transfer of personal data is the 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.
   14. Destruction of personal data – any actions as a result of which personal data are destroyed irrevocably with the impossibility of further restoration of the content of personal data in the personal data information system and (or) the material media of personal data are destroyed.
2. **Main rights and responsibilities of the Operator**
   1. Operator is entitled:

* receive from the subject of personal data reliable information and/or documents containing personal data;
* if the subject of personal data withdraws consent to the processing of personal data, the Operator has the right to continue processing personal data without the consent of the subject of personal data if there are grounds specified in the Law on Personal Data;
* independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations provided for by the Law on Personal Data and regulations adopted in accordance with it, unless otherwise provided by the Law on Personal Data or other federal laws.
  1. Operator is obliged to:
* provide the subject of personal data, 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 requests and inquiries from personal 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, at the request of this body, the necessary information within 30 days from the date of receipt of such a request;
* publish or otherwise provide unrestricted 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, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data;
* stop transfer (distribution, provision, access) of personal data, stop processing and destroy personal data in the manner and cases provided for by the Law on Personal Data;
* fulfill other duties provided for by the Personal Data Law.

1. **Basic rights and obligations of subjects of personal data**
   1. The holdings of Personal Data are entitled to:

* receive information regarding the processing of his personal data, except for cases provided for by federal laws. The information is provided to the subject of personal data by the Operator in an accessible form, and it should not contain personal data relating to other subjects of personal data, except in cases where there are legal grounds for the disclosure of such personal data. The list of information and the procedure for obtaining it is established by the Law on Personal Data;
* require the Operator to clarify his personal data, block it 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 take measures provided by law to protect their rights;
* put forward a condition of prior consent when processing personal data in order to promote goods, works and services on the market;
* to withdraw consent to the processing of personal data;
* to exercise other rights provided for by the legislation of the Russian Federation.
  1. Subjects of personal data are obliged to:
* provide the Operator with reliable information about yourself;
* inform the Operator about clarification (updating, changing) of your personal data.
  1. Persons who provided the Operator with false information about themselves or information about another subject of personal data without the latter’s consent are liable in accordance with the legislation of the Russian Federation.

1. **The Operator may process the following personal data of the User**
   1. Family name, given name, father name.
   2. Email.
   3. Phone number.
   4. The site also collects and processes anonymized data about visitors (including cookies) using Internet statistics services (Yandex Metrica and Google Analytics and others).
   5. The above data below in the text of the Policy are united by the general concept of Personal Data.
   6. The Processing of special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, intimate life is not carried out by the Operator.
   7. Processing of personal data permitted for distribution from among the special categories of personal data specified in Part 1 of Art. 10 of the Law on Personal Data is permitted if the prohibitions and conditions provided for in Art. 10.1 of the Personal Data Law.
   8. The User’s consent to the processing of personal data permitted for distribution is issued separately from other consents to the processing of his personal data. In this case, the conditions provided for, in particular, Art. 10.1 of the Personal Data Law. Requirements for the content of such consent are established by the authorized body for the protection of the rights of personal data subjects.
      1. The User provides consent to the processing of personal data permitted for distribution to the Operator directly.
      2. The Operator is obliged, no later than three working days from the date of receipt of the specified consent of the User, to publish information about the conditions of processing, the existence of prohibitions and conditions for the processing of personal data permitted for distribution by an unlimited number of persons.
      3. The transfer (distribution, provision, access) of personal data authorized by the subject of personal data for distribution must be stopped at any time at the request of the subject of personal data. This requirement must include the last name, first name, patronymic (if any), contact information (telephone number, email address or postal address) of the subject of personal data, as well as a list of personal data whose processing is subject to termination. The personal data specified in this requirement can only be processed by the Operator to whom it is sent.
      4. Consent to the processing of personal data permitted for distribution terminates from the moment the Operator receives the request specified in clause 5.8.3 of this Policy regarding the processing of personal data.
2. **Principles of personal data processing**
   1. The processing of personal data is carried out on a legal and fair basis.
   2. The processing of personal data is limited to the achievement of specific, pre-defined and legitimate purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not permitted.
   3. It is not allowed to combine databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other.
   4. Only personal data that meets the purposes of their processing are subject to processing.
   5. The content and volume of personal data processed correspond to the stated purposes of processing. Redundancy of the processed personal data in relation to the stated purposes of their processing is not allowed.
   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 are ensured. The operator takes the necessary measures and/or ensures that they are taken to delete or clarify incomplete or inaccurate data.
   7. The storage of personal data is carried out in a form that makes it possible to identify the subject of personal data, no longer than required by the purposes of processing personal data, unless the period for storing personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor. The processed personal data is destroyed or anonymized upon achievement of the processing goals or in the event of the loss of the need to achieve these goals, unless otherwise provided by federal law.
3. **Purpose of processing personal data**
   1. Purpose of processing the User’s personal data:

* informing the User by sending emails, calls, SMS messages.
  1. The Operator also has the right to send notifications to the User about new products and services, special offers and various events. The User can always refuse to receive information messages by sending the Operator an email to system@mycontainers.ru with the note “Refusal of notifications about new products and services and special offers”.
  2. Anonymized data of Users, collected using Internet statistics services, serves to collect information about the actions of Users on the site, improve the quality of the site and its content.

1. **Legal grounds for processing personal data**
   1. The legal grounds for processing personal data are:

* Federal Law № 152 "On the processing of personal data";
* federal laws, other regulatory acts in the sphere of personal data protection;
* consent of Users to processing of their personal data, to processing of personal data allowed for distribution.
  1. The Operator processes the User’s personal data only if it is filled out and/or sent by the User independently through special forms located on the website http://1minskterminal.com/en or sent to the Operator via email. By filling out the appropriate forms and/or sending his personal data to the Operator, the User expresses his consent to this
  2. The Operator processes anonymized data about the User if this is allowed in the User's browser settings (saving cookies and using JavaScript technology are enabled).
  3. The subject of personal data independently decides to provide his personal data and gives consent freely, of his own free will and in his own interest.

1. **Conditions for processing personal data**
   1. The processing of personal data is carried out with the consent of the subject of personal data to the processing of his personal data.
   2. The processing of personal data is necessary to achieve the goals provided for by an international treaty of the Russian Federation or law, to implement the functions, powers and responsibilities assigned by the legislation of the Russian Federation to the operator.
   3. The processing of personal data is necessary for the administration of justice, the execution of 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.
   4. The processing of personal data is necessary for the execution of an agreement to which the subject of personal data is a party or beneficiary or guarantor, as well as for concluding an agreement on the initiative of the subject of personal data or an agreement under which the subject of personal data will be a beneficiary or guarantor.
   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 goals, provided that the rights and freedoms of the subject of personal data are not violated.
   6. The processing of personal data is carried out, access to 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. Personal data subject to publication or mandatory disclosure under federal law is processed.
2. **Procedures for the collection, storage, transmission and other processing of personal data**

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

* 1. The Operator shall ensure the preservation of personal data and shall take all possible measures to exclude access to personal data of unauthorized persons.
  2. The User’s personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of current legislation or in the event that the subject of personal data gives consent to the Operator to transfer data to a third party to fulfill obligations under a civil law contract.
  3. If inaccuracies in personal data are identified, the User can update them independently by sending a notification to the Operator to the Operator's e-mail address system@mycontainers.ru marked “Updating personal data.”
  4. The period for processing personal data is determined by the achievement of the purposes for which the personal data were collected, unless a different period is provided for by the contract or current legislation. The User may at any time withdraw his consent to the processing of personal data by sending a notification to the Operator via email to the Operator's email address system@mycontainers.ru marked “Withdrawal of consent to the processing of personal data.”
  5. All information that is collected by third-party services, including payment systems, communications and other service providers, is stored and processed by these persons (Operators) in accordance with their User Agreement and Privacy Policy. The subject of personal data and/or the User is obliged to independently familiarize himself with the specified documents in a timely manner. The Operator is not responsible for the actions of third parties, including the service providers specified in this paragraph. 10.6. Prohibitions established by the subject of personal data on the transfer (except for providing access), as well as on processing or conditions for processing (except for gaining 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 law RF.
  6. When processing personal data, the operator ensures the confidentiality of personal data.
  7. The Operator stores personal data in a form that makes it possible to identify the subject of personal data for no longer than required by the purposes of processing personal data, unless the period for storing personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor.
  8. The condition for terminating the processing of personal data may be the achievement of the purposes of processing personal data, the expiration of the consent of the subject of personal data or the withdrawal of consent by the subject of personal data, as well as the identification of unlawful processing of personal data.

1. **List of actions performed by the Operator with personal data received**
   1. The Operator collects, records, systematizes, accumulates, stores, refines (updates, changes), extracts, uses, transfers (distribute, provide, access), depersonalizes, blocks, deletes and destroys personal data.
   2. The Operator carries out automated processing of personal data with or without receiving and/or transmitting the received information via information and telecommunication networks.
2. **Cross-border transfers of Personal Data**
   1. Before the start of cross-border transfer of personal data, the operator is obliged to ensure that the foreign state into whose territory it is intended to transfer personal data provides reliable protection of the rights of personal data subjects.
   2. Cross-border transfer of personal data to the territory of foreign states that do not meet the above requirements can only be carried out if there is written consent of the subject of personal data to the cross-border transfer of his personal data and/or execution of an agreement to which the subject of personal data is a party.
3. **Privacy of personal data**

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

1. **Final Regulations**
   1. The User can receive any clarification on issues of interest regarding the processing of his personal data by contacting the Operator via email [system@mycontainers.ru](mailto:system@mycontainers.ru).
   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.
   3. The current version of the Policy is freely available on the Internet at http://1minskterminal.com/en