

# Privacy Policy

## 1. FUNCTION AND AREA OF ACTION OF THE DOCUMENT

- 1.1. This document defines the policy of BRIDGE GROUP Limited Liability Company (PSRN (Primary State Registration Number): 5157746209055, TIN: 7704340969, address: 117638, Moscow city, Odessaskaya street, 2, tower C, office 613) (hereinafter - BRIDGE GROUP LLC) regarding the processing of personal data.
- 1.2. This Policy is developed in accordance with the current legislation of the Russian Federation on personal data.
- 1.3. This Policy applies to all processes of collection, recording, systematization, accumulation, storage, clarification, extraction, using, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data realized using automation tools and without use of such funds.
- 1.4. The following terms are used in this Privacy Policy:
  - 1.4.1. **"Site Administration"** - authorized employees to manage the Site, acting on behalf of BRIDGE GROUP LLC, which organize and (or) process personal data, and also determine the purposes of processing personal data, the composition of personal data to be processed, actions (operations) committed with personal data.
  - 1.4.2. **"Personal data"** - any information relating directly or indirectly to a specific or determinable individual (subject of personal data).
  - 1.4.3. **"Processing of personal data"** - any action (operation) or set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, using, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.
  - 1.4.4. **"Confidentiality of personal data"** is a requirement for the Operator or other person who has gained access to personal data to comply with the requirement not to allow their dissemination without the consent of the subject of personal data or other legal grounds.
  - 1.4.5. **"Site User"** - a person who has access to the Site through the Internet and uses the Site of BRIDGE GROUP LLC.
  - 1.4.6. **"Cookies"** - a small part of data sent by the web server and stored on the user's computer, which the web client or web browser sends to the web server each time in an HTTP request when trying to open the page of the corresponding Site.
  - 1.4.7. **"IP address"** – special network address of a node in a computer network built over IP.
  - 1.4.8. The site of BRIDGE GROUP LLC is the official Internet site of the company - <https://bridge-group.ru>.
  - 1.4.9. **"My Account"** is a special section of the Site [bridge-group.ru](https://bridge-group.ru), which allows a user who is an employee of BRIDGE GROUP LLC to access information related to his or her labor activity, including 2NDFL information and settlement sheets.

## 2. TERMS OF PROCESSING PERSONAL DATA

The processing of personal data realizes in compliance with the principles and rules established by the Federal Law of June 27, 2006 No. 152-FL "On Personal Data". The processing of personal data is allowed in the following cases:

- 1) The processing of personal data realizes 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 intentions stipulated by the international treaty of the Russian Federation or the law, to realize functions, powers and obligations assigned to the operator by the legislation of the Russian Federation;
  - 3) The processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of other agency or executive, 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 implementation of a contract to which either the beneficiary or guarantor is a personal data subject, as well as for the conclusion of a contract on the initiative of the personal data subject or the contract under which the personal data subject will be the beneficiary or guarantor;
  - 5) The processing of personal data is necessary to protect the life, health or other vital interests of the subject of personal data, if obtaining the consent of the subject of personal data is impossible;
  - 6) The processing of personal data is necessary to implement the rights and legitimate interests of the operator or third parties, or to achieve socially significant intentions, provided that this does not violate the rights and freedoms of the subject of personal data;
  - 7) The processing of personal data realizes for statistical or other research purposes, subject to the mandatory depersonalization of personal data. The exception is the processing of personal data in order to promote products, works, services on the market by making direct contacts with potential consumers using communications, as well as for political campaigning;
  - 8) Realizing the processing of personal data, to which access to an unlimited circle of persons is provided by the subject of personal data, or at his request (hereinafter - personal data made publicly available by the subject of personal data);
  - 9) Realizing the processing of personal data subject to publication or mandatory disclosure accordingly with federal law.
- 2.1. BRIDGE GROUP LLC may include personal data of entities in public sources of personal data, while BRIDGE GROUP LLC takes the written consent of the entity to process its personal data.
  - 2.2. BRIDGE GROUP LLC may process special categories of personal data regarding race, nationality, health status, while BRIDGE GROUP LLC undertakes to accept the consent of the subject to the processing of its personal data.
  - 2.3. Biometric personal data (information that characterizes the physiological and biological characteristics of a person, on the basis of which it is possible to establish his identity and which are used by the operator to establish the identity of the subject of personal data) is not processed.
  - 2.4. BRIDGE GROUP LLC realizes cross-border transfer of personal data only to the territory of foreign states that provide adequate protection of the rights of personal data subjects.
  - 2.5. Admission on the basis of exclusively automated processing of personal data of decisions that generate to legal consequences in relation to the subject of personal data or otherwise affect his rights and legitimate interests is not processed.
  - 2.6. BRIDGE GROUP LLC undertakes and obliges other persons who have gained access to personal data not to disclose to third parties and not to distribute personal data without the consent of the personal data subject, unless otherwise provided by federal law;
  - 2.7. In case of disagreement with the terms of the Privacy Policy, the User must stop using the Site.

**2.8.** This Privacy Policy applies only to the Website of BRIDGE GROUP LLC. BRIDGE GROUP LLC does not control and is not responsible for third party sites to which the User can click on the links available on the BRIDGE GROUP LLC Website.

### **3. COMPOSITION, PURPOSES AND METHODS OF PROCESSING PERSONAL DATA**

- 3.1.** When registering on the Site bridge-group.ru (hereinafter referred to as the "Site"), the User provides the following information: name, email, phone number, and also, if necessary, when gaining access to your personal account: last and middle name (patronymic), address of residence, SNILS and TIN.
- 3.2.** Submitting their personal data, the User agrees to their processing (up to the withdrawal of his consent to the processing of his personal data) by BRIDGE GROUP LLC, in order to fulfill his obligations related to the provision of accounting, legal services, occupational safety and other ones, providing reference information, information related to labor activity at BRIDGE GROUP LLC, and also agrees to receive advertising and informational messages and service messages. When processing the User's personal data, BRIDGE GROUP LLC is guided by the Federal Law "On Personal Data", the Federal Law "On Advertising" and local regulatory documents.
- 3.3.** If the User wants to clarify his personal data, block it or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated processing purpose, or if the User wants to withdraw his consent to the processing of personal data or to eliminate illegal actions of LLC "BRIDGE GROUP" in relation to his personal data, he must send an official request in the manner prescribed by the Policy of LLC "BRIDGE GROUP" in Ocean processing of personal data.
- 3.4.** If the User wants to delete his account on the Site, the User contacts refuse@bridge-group.ru with the corresponding request. This action does not imply the withdrawal of the User's consent to the processing of his personal data.
- 3.5.** LLC "BRIGGROUP" uses the data provided by the User during the entire period of registration of the User on the Site in order to:
- 3.5.1.** User registration/authorization on the Site;
  - 3.5.2.** process User requests and meet commitments to User
  - 3.5.3.** implement activities to promote services;
  - 3.5.4.** assessment and analysis of the Site;
  - 3.5.5.** implement activities to provide relevant information requested by the User;
  - 3.5.6.** inform the User about promotions, discounts and special offers through electronic and SMS mailings;
  - 3.5.7.** identification of the User registered on the Site for further conclusion of a contract for the provision of services;
  - 3.5.8.** provide the User with access to the personalized resources of the Site;
  - 3.5.9.** establish feedback with the User, including sending notifications, requests regarding the use of the Site, the provision of services, processing requests and applications from the User;
  - 3.5.10.** confirmations of the accuracy and completeness of personal data provided by User
  - 3.5.11.** creation of a personal account of the User with the consent of the User;
  - 3.5.12.** provide the User with effective customer and technical support in case of problems associated with the use of the Site.
- 3.6.** Processing is realized only to the personal data that measure up to the purposes of their processing.

**3.7.** The User's personal data can be transferred to authorized agencies of state power of the Russian Federation only on the grounds and in the manner established the legislation of the Russian Federation.

#### **4. STORAGE OF PERSONAL DATA AND RESPONSIBILITIES OF BRIDGE GROUP LLC**

- 4.1.** Storage of personal data realizes in a form that allows you to determine the subject of personal data no longer than what is required by the purpose of processing personal data, unless the storage period for personal data is established by federal law, an agreement to which the beneficiary or guarantor is a subject of personal data.
- 4.2.** The processed personal data is subject to destruction or depersonalization upon achievement of the processing purposes or in case of loss of the need to achieve these purposes, unless otherwise provided by federal law.
- 4.3.** Accordingly with the requirements of Federal Law No. 152-FL "On Personal Data", BRIDGE GROUP LLC is obliged to:
- 4.3.1.** Provide the personal data subject at his request with information regarding the processing of his personal data, or legally provide a refusal.
- 4.3.2.** At the request of the personal data subject, specify the processed personal data, block or delete it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing.
- 4.3.3.** Keep a Journal of registration of appeals of subjects of personal data in which the requests of subjects of personal data for receiving personal data should be recorded, as well as the facts of the provision of personal data on these requests.
- 4.3.4.** Notify the subject of personal data about the processing of personal data in the event that personal data was received not from the subject of personal data. The following cases are an exception:
- 4.4.** BRIDGE GROUP LLC realizes the processing of personal data for statistical or other research purposes, for the professional activities of a journalist or scientific, literary or other creative activities, if this does not violate the rights and legitimate interests of the subject of personal data processing;
- 4.5.** Providing the subject of personal data processing with information contained in the Notice on the processing of personal data violates the rights and legitimate interests of third parties.
- 4.6.** If the purpose of processing personal data is achieved, immediately stop processing personal data and destroy the corresponding personal data within a period not exceeding thirty days from the date the purpose of processing personal data was achieved, unless otherwise provided by the contract to which the beneficiary or guarantor is the subject of personal data , by another agreement between the Company and the personal data subject, or if the Company is not entitled to process personal data without the consent of the personal data subject on the grounds provided for by No. 152-ФЗ "On Personal Data" or other federal laws.
- 4.7.** In case of withdrawal by the subject of personal data of consent to the processing of his personal data, stop processing personal data and destroy personal data within a period not exceeding thirty days from the date of receipt of the designated revocation, unless otherwise provided by agreement between the Company and the subject of personal data. The company is obliged to notify the subject of personal data about the destruction of personal data.
- 4.8.** In case of receipt of the entity's request to terminate the processing of personal data.
- 4.9.** BRIDGE GROUP LLC protects Data that is automatically transmitted when viewing ad units and when visiting pages on which the system's statistical script is installed ("pixel"):  
IP address  
information from cookies;

information about the browser (or other program that accesses the display advertising);  
access time;  
the address of the page on which the ad unit is located;  
referrer (address of the previous page).

- 4.10.** Disabling cookies may result in the inability to access parts of the Site that require authorization.
- 4.11.** BRIDGE GROUP LLC collects statistics about the IP addresses of its Users. This information is used to identify and solve technical problems, to control the legality of financial payments.

## **5. PERSONAL DATA SECURITY MEASURES FOR THEIR PROCESSING**

- 5.1.** In processing personal data, BRIDGE GROUP LLC takes the necessary legal, organizational and technical measures to protect personal data from unlawful or accidental access to it, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in regarding personal data.
- 5.2.** Ensuring the security of personal data realizes by:
- the definition of threats to the security of personal data during their processing in personal data information systems;
  - the application of organizational and technical measures to ensure the security of personal data during their processing in personal data information systems necessary to fulfill the requirements for the protection of personal data, the implementation of which ensures the levels of personal data security established by the Government of the Russian Federation;
  - using of the procedures of conformity assessment of information security facilities that have passed in the established manner;
  - assessment of the effectiveness of measures taken to ensure the security of personal data prior to the commissioning of the personal data information system;
  - taking into account computer storage media of personal data;
  - the discovery of unauthorized access to personal data and taking action;
  - restoration of personal data modified or destroyed due to unauthorized access to them;
  - the establishment of rules for access to personal data processed in the personal data information system, as well as the registration and recording of all actions performed with personal data in the personal data information system;
  - control over measures taken to ensure the security of personal data and the level of security of personal data information systems.
- 5.3.** BRIDGE GROUP LLC has the right to use the technology of cookies. Cookies do not contain confidential information and are not transferred to third parties.
- 5.4.** BRIDGE GROUP LLC receives information about the IP address of the Site User and information about the link from which website the User came. This information is not used to identify the User.
- 5.5.** In processing personal data BRIDGE GROUP LLC takes the necessary and sufficient organizational and technical measures to protect personal data from unauthorized access to them, as well as from other illegal actions in relation to personal data.

## **6. ADDITIONAL TERMS**

- 6.1.** The Site Administration has the right to make changes to this Privacy Policy without the consent of the User.
- 6.2.** The new Privacy Policy becomes operational from the moment it is posted on the Website of the online store, unless otherwise provided by the new version of the Privacy Policy.

- 6.3.** The Site Administration, which has not fulfilled its obligations, is liable for losses incurred by the User in connection with the unlawful use of personal data accordingly with the legislation of the Russian Federation, with the exception of cases provided for in this Privacy Policy.
- 6.4.** In case of loss or disclosure of Confidential Information, the Site Administration is not responsible if this confidential information:
- Has become public domain before its loss or disclosure;
  - Was received from a third party until it was received by the Site Administration;
  - It was disclosed with the consent of the User.
- 6.5.** The user is obliged to provide relevant and reliable information about personal data necessary for using the online store by Site
- 6.6.** The Site Administration is obliged to use the information received solely for the purposes specified in this Privacy Policy.
- 6.7.** All suggestions or questions about this Privacy Policy should be reported by E-mail: [info@bridge-group.ru](mailto:info@bridge-group.ru)
- 6.8.** The current Privacy Policy is available on the page at <https://bridge-group.ru>.