

**APPROVED BY**  
Director General  
White Box Media LLC  
Limited Liability Company  
A.A. Ivaniushin

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August 1, 2019

## **Policy of Protection and Processing of Personal Data White Box Media Limited Liability Company**

### **General Provisions**

1.1. This Policy concerning the processing of personal data (hereinafter – the Policy) is made in accordance with paragraph 2 of article 18.1 of Federal law " № 152-FZ "On personal data" as of 27 July 2006, as well as other normative legal acts of the Russian Federation in the field of protection and processing of personal data and applies to all personal data (hereinafter – data), which the Organization (hereinafter – the Operator, the Company) may obtain from the personal data owner, being a party to the services agreement while using any of the sites, services, programs or products provided by **White Box Media LLC**, and from the personal data owner, being in relations with the Operator regulated by the labour law (hereinafter – the Employee) or in any other relations.

1.2. The Operator secures protection of the processed personal data from unauthorized access and disclosure, unlawful use or loss in accordance with the requirements of Federal law No. 152-FZ "On Personal Data" as of July 27, 2006.

1.3. The Operator has the right to make changes to this Policy. When making changes, the date of the last revision is specified in the Policy heading. The revised Policy comes into force from the moment of adoption of revisions and its posting on the website, unless otherwise provided in the new version of the Policy.

## 2. Terms and Abbreviations

**Personal Data** – any information related to a directly or indirectly identified or identifiable individual (personal data owner).

**Personal Data Processing** – 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 (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

**Automated Processing of Personal Data** – processing of personal data using computer technology.

**Personal Data Information System (ISPS)** – a set of personal data contained in databases that ensure their processing using information technologies and technical devices.

**Personal Data Made Publicly Available by the Personal Data Owner** mean personal data that an unlimited number of persons have access to, or at the request of, the personal data owner.

**Blocking of Personal Data** – temporary termination of personal data processing (except for cases when processing is necessary to clarify personal data).

**Destruction of Personal Data** – actions that make it impossible to restore the content of personal data in the personal data information system and (or) as a result whereof the physical storage media of personal data is destroyed.

**Partner** - a legal entity (individual entrepreneur) that has a legal relationship with the Operator and has a corresponding agreement (contract) with the Operator.

**Operator** – an organization that independently or jointly with other persons organizes the processing of personal data, as well as determines the purposes of processing of personal data to be processed, actions (operations) performed with personal data.

## 3. TERMS OF PERSONAL DATA PROCESSING

3.1. The Operator may process Personal Data in the following cases:

3.1.1. If the owner consents to the processing of his/her Personal Data.

3.1.2. When transferring his/her Personal Data, the owner guarantees that they have previously received consent from the personal data owner to transfer the data to the Operator.

3.1.3. Personal Data is subject to publication or mandatory disclosure in accordance with the Law.

3.2. The operator does not disclose or distribute Personal Data to third parties without the consent of the owner, unless otherwise provided by Law.

3.3. The operator does not process Personal Data belonging to special categories and relating to race and nationality, political views, religious or philosophical beliefs, health status, intimate life of the personal data owner, membership of the personal data owner in public associations, except in cases expressly provided for by Law.

3.4. The operator does not perform cross-Border transfer of Personal Data of owners, except in cases expressly provided for by Law.

3.5. The operator does not make decisions that create legal consequences for the owner or otherwise affect the rights and legitimate interests of owners based solely on automated processing of Personal Data. Data that have legal consequences or affect the rights and legitimate interests of owners are subject to verification by authorized employees of the Operator before their use.

#### **4. COLLECTION AND PROCESSING OF PERSONAL DATA AND OTHER DATA**

- 4.1. Personal Data permitted to be processed under this Privacy Policy are provided by the owner.
- 4.3. Personal Data (and other Data transmitted by the owner) may be used for the following purposes:
  - 4.3.1. implementation of labor relations;
  - 4.3.2. implementation of civil law relations;
  - 4.3.3. for the execution of agreements and contracts;
  - 4.3.4. depersonalization of personal data in order to obtain depersonalized statistical data that are transmitted to a third party for research, performance of works or provision of services.
  - 4.3.5. identification of partners.
  - 4.3.6. sending advertising materials, information, and requests to Partners.
  - 4.3.7. conducting statistical and other research.
  - 4.3.8. performing other duties defined by the terms of the public offer.
- 4.4. The Operator undertakes to use Personal Data in accordance with Federal Law No. 152-FZ "On Personal Data" as of July 27, 2006 and the Operator's bylaws
- 4.5. Personal Data and other Data of Partners are kept confidential, except in cases when the specified data are publicly available.
- 4.6. The Operator has the right to keep an archived copy of Personal Data and other Data.
- 4.7. The Operator has the right to transfer Personal Data without the consent of the owner to the following parties:
  - 4.7.1. State bodies, including bodies of inquiry and investigation, and local self-government bodies upon their reasoned request.
  - 4.7.2. In other cases directly stipulated by the current legislation of the Russian Federation.
- 4.8. The Operator has the right to transfer Personal Data and other Data to third parties not specified in clause 4.7 of this Policy in the following cases:
  - 4.8.1. The Partner has expressed his/her consent to such actions.
  - 4.8.2. The transfer is necessary within the framework of other obligations arising from the public offer.
  - 4.8.3. The transfer takes place within the framework of succession, and all obligations to comply with the terms of this Policy pass to the acquirer from the Operator.
- 4.9. The Operator performs automated processing of Personal Data and other Data.

## **5. CHANGING PERSONAL DATA**

- 5.1. The owner may change (update, supplement) Personal Data at any time by sending a written application to the Operator.
- 5.2. The owner has the right to delete Personal Data (Data) at any time by sending a written request to withdraw its consent to the Personal Data processing.

## **6. PRIVACY OF PERSONAL DATA**

- 6.1. The Operator ensures the confidentiality of Personal Data (Data) processed by it in accordance with the procedure provided for by Law. Confidentiality is not required for:
  - 6.1.1. Personal Data after their depersonalization.
  - 6.1.2. Personal Data, access of an unlimited number of persons where to is provided by the owner or at his/her request (hereinafter Personal Data made publicly available by the owner).
  - 6.1.3. Personal data subject to publication or mandatory disclosure in accordance with the Law.

## **7. THE OWNER'S CONSENT TO PERSONAL DATA PROCESSING**

- 7.1. The personal data owner decides to provide his/hers Personal Data to the Operator and agrees to their processing freely, voluntarily and for his/hers benefit.
- 7.2. Personal Data of persons who have entered into contractual obligations with the Operator, contained in the unified state registers of legal entities and individual entrepreneurs, are open and publicly available, with the exception of information about the number, date of issue and the authority that issued the identity document of the individual. Protection of their confidentiality and the owner's consent to the processing of his/hers data is not required.

## **8. RIGHTS OF PERSONAL DATA OWNERS**

- 8.1. The owner has the right to receive information concerning the processing of his/her Personal Data (Data). The owner has the right to request from the Operator to clarify his/her Personal Data, block or destroy them if the Personal Data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as to take legal measures to protect his/her rights.
- 8.2. If an owner believes that the Operator processes his/her Personal Data in violation of Legal requirements or otherwise violates his/her rights and freedoms, the owner has the right to appeal against the actions or omissions of the Operator in the authorized body for the protection of the rights of Personal data subjects or in court.

## **9. OTHER PROVISIONS**

- 9.1. The law of the Russian Federation applies to this Policy and the relations between the personal data owner and the Operator arising in connection with the application of the Policy.
- 9.2. All possible disputes shall be resolved in accordance with the Law.  
Before referring to court the owner shall comply with the pre-court procedure and sent the Operator an applicable claim in written. The time period for the reply to the claim equals to thirty (30) working days.
- 9.3. If for any reasons one or several provisions of the Policy are recognized invalid or void, this shall have no effect on the validity or enforceability of the remaining provisions of the Privacy Policy.
- 9.4. The owner shall independently monitor the changes in the Privacy Policy by familiarizing himself/herself with the current version.

## 10. COOKIES AND RELATED TECHNOLOGIES

**White Box Media LLC** uses cookies, tracking pixels and related technologies to provide our services for Advertisers. Cookies are small data files that are served by our platform and stored on your device. They enable us to identify your device when you move between different websites and applications, so that we can serve targeted advertising to you.

Specifically, the White Box Media LLC cookie we serve through the White Box Media LLC platform for this purpose is named “vid”. We may also drop an additional White Box Media LLC opt-out (“optOut”) cookie if you opt-out as described below. We may also drop cookies from our Advertising Partners for the purposes described above. The Advertising Partner cookies dropped vary by Advertiser implementation.

## 11. YOUR CHOICES AND OPTING-OUT

We recognize how important your online privacy is to you, so we offer the following options for controlling the targeted ads you receive and how we use your data:

You can opt out of receiving targeted ads served by us or on our behalf by clicking on the blue icon that typically appears in the corner of the ads we serve or by clicking on the opt-out button at web-site whiteboxdigital.ru. Please note that, if you delete your cookies or upgrade your browser after having opted out, you will need to opt out again. If you opt-out we may collect some data about your online activity for operational purposes (such as fraud prevention) but it won't be used by us for the purpose of targeting ads to you.

While we may link multiple browsers or devices to you, if you opt out on a device or browser we will not use data collected after you opted out on that device or browser for targeted advertising purposes. Therefore, if you use multiple browsers or devices you will need to execute this opt out on each browser or device.

To opt out of receiving targeted ads that are based on your behavior across different mobile applications follow the below instructions, for iOS and Android devices:

iOS 7 or Higher: Go to your Settings > Select Privacy > Select Advertising > Enable the “Limit Ad Tracking” setting

For Android devices with OS 2.2 or higher and Google Play Services version 4.0 or higher: Open your Google Settings app > Ads > Enable “Opt out of interest-based advertising”

Opting out will not prevent you from seeing ads, but those ads will likely be less relevant because they won't be tailored to your interests. The ads might, for instance, be randomly generated or based on the web page you are visiting.

Some internet browsers allow users to send a "Do Not Track" signal to websites they visit. We do not respond to this signal.

We recognize how important your online privacy is to you, so we offer the following options for controlling the targeted ads you receive and how we use your data:

You can opt-out of receiving targeted ads served by us: You can opt out of receiving targeted ads served by us or on our behalf by clicking on the by clicking on the opt-out button at the bottom of this page. Please note that, if you delete your cookies or upgrade your browser after having opted out, you will need to opt out again. Further, if you use multiple browsers or devices you will need to execute this opt out on each browser or device. If you opt-out we may collect some data about your online activity for operational purposes (such as fraud prevention) but it won't be used by us for the purpose of targeting ads to you.

Some internet browsers allow users to send a "Do Not Track" signal to websites they visit. We do not respond to this signal.

In addition, you may also have the right to access, correct or update some of the information we hold about you. You can also request that we delete your information. If you wish to exercise any of these rights, please contact us at [Do1@whiteboxdigital.ru](mailto:Do1@whiteboxdigital.ru) Please note that in many cases, we hold identifiable information only on behalf of our Advertiser clients, and we may instead direct you to contact them.

### **CONTACT US ABOUT QUESTIONS OR CONCERNS**

If you have any questions about this Privacy Notice, our privacy practices, you can contact [Do1@whiteboxdigital.ru](mailto:Do1@whiteboxdigital.ru)