

## THE PRIVACY POLICY OF THE SERVICE.

*The privacy Policy of the Service defines the policy of TV START regarding the processing of User Data when using the Service, and also contains information about the requirements for the protection of personal data of Users.*

### 1. TERMS.

1.1. TV START is a legal entity established in accordance with the legislation of the Russian Federation and providing Users with the Service: Limited Liability Company "Teleradiokompania "Start" (OGRN 1047796200671; address: 32A Elektrozavodskaya str., Moscow, 107023).

1.2. Service is a hardware and software complex owned by TV START, functionally designed to provide Users with access to Content under the terms of this User Agreement, and to inform Users about TV START services and products. Access to the Service is realized using the Internet site tvstart.ru , as well as in other ways established by the User Agreement.

1.3. The User is a capable individual who provides access to the Service via the Internet.

1.4. Services – the activity of TV START to provide Users with access to the functionality of the Service.

1.5. User Agreement is an agreement regulating the relationship between the User of the Service and TV START.

1.6. Data is information that Users transmit to TV START during the use of the Service.

1.7. Data processing is a process or set of processes that are performed with or without automation tools. These processes include collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion and destruction of data.

1.8. Other terms not defined by this Policy are subject to interpretation in accordance with the User Agreement, and in the absence of their definition in the User Agreement – in accordance with the generally accepted meaning in the Internet environment.

### 2. POLICY ACTION.

2.1. This document (hereinafter referred to as the "Policy") establishes the rights and obligations of TV START in the process of processing Data of Users of the Service.

2.2. This Policy has been developed in accordance with the legislation of the Russian Federation governing relations in the field of personal data security.

2.3. By accessing the Service, the User agrees to the terms of data processing of TV START described in this Policy. If the User does not agree with such

terms of use of the Service, the User does not have the right to join the User Agreement and use the Service in any way.

2.4. The User agrees to the terms of this Policy from the moment the User begins to actually use any functionality of the Service.

2.5. This Policy may be changed unilaterally by TV START at any time, without obtaining the User's consent and without prior notice. The current version of this Policy is published by TV START on the Internet on the Service's website page. The new version of the Policy comes into force and becomes mandatory for the User to comply with from the moment of publication, unless TV START explicitly indicates otherwise.

2.6. TV START reserves the right to process the User's data in relation to the User's personal data – until the moment of receipt of the relevant notification to the User; in relation to other data – until the moment determined by applicable law.

### 3. THE PURPOSES AND CONDITIONS OF PROCESSING USER DATA.

3.1. The data includes information that Users transmit to TV START during the use of the Service, and represents both depersonalized user data and personal data of Users.

3.2. The data is collected for the purpose of concluding and executing an agreement between the User and TV START, namely the User Agreement, as well as improving the quality of TV START services and improving the Service. In particular, the purposes of Data processing are:

- implementation and/or performance of the functions, powers and duties assigned by the legislation of the Russian Federation to TV START.
- identification of Users in the Service as part of the provision of services;
- providing Users with up-to-date information about the Service and the possibility of access to it;
- processing requests from TV START Users or the Service support service, sending responses to User requests;
- monitoring compliance with the User Agreement and Policy, preventing and detecting fraud and illegal use of the Service, the services of the Service;
- determining User preferences to improve the quality of the Service, including by improving navigation through the Service, demonstrating advertising and information materials relevant to the User's interests, providing Users with personalized offers and recommendations;
- sending service, advertising and other information related to the use of the Service to Users.

3.3. TV START, having gained access to the Data, is obliged 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.

3.4. TV START has the right to entrust the processing of Data to another person on the basis of an agreement concluded with this person, the User expresses his consent to the exercise of this right by TV START. In particular:

- TV START provides access to data to contractors who collect and analyze data (including those who manage or use the following systems: Yandex Metrika, Google Analytics, App metrica and the like);
- TV START transmits User data to third parties performing processing functions when the User pays for paid services of the Service;
- TV START transfers User data to third parties when conducting joint marketing and advertising campaigns with such persons, while the list of such persons, the volume and conditions of data transfer are reflected in the rules for conducting relevant marketing and advertising campaigns.

3.5. The use of the Service is conditioned by the use of "Cookies" technology by creating cookies on the User's device in order to control the use of the Service, collect non-personal information about Users, save preferences and other information on the User's device in order to save Users time needed to repeatedly enter the same information in the forms of the Service, as well as in order to display the content during subsequent visits by the User of the Service. By agreeing to the terms of data processing set out in this Policy, the User also agrees to the processing of cookies for the above purposes. The user can view the expiration date of cookies, as well as prohibit their storage in their browser settings.

3.6. During the use of the Service, the following Data may be transmitted to TV START by the User:

- the User's first and/or last name;
- e-mail address;
- registration data (login and password to access certain functions of the Service);
- avatar;
- user's gender;
- information about Subscriptions previously provided to the User;
- information about subscribing to information materials or materials from the Service's support services;
- user ID on the social network;
- data on the User's interaction with the Service ("likes", comments, a list of selected content, the history of visited pages and the information listed in clause 3.7.);
- information received by TV START as a result of using the functionality of the Service by the User (preferences, time of use of the Service and information listed in clause 3.7.).

3.7. The User consents to TV START processing the following data received by TV START during the User's use of the Service:

- IP address of the User's Device;
- information contained in Cookies;
- type of authorization;
- consent to receive mailings;

- information about the location of the device used by the User;
- information about the User's Internet browser;
- the address of the page or media content of the Service requested by the User's device;
- information about the User's device through which the Service is accessed;
- screenshots from the User's device;
- user interaction with the device screen (touches and swipes on the screen, as well as other gestures);
- virtual identifiers of the User's device;
- information about the User's interaction with the Service, as defined in clause 3.6. of this Policy.

#### 4. PRINCIPLES OF DATA PROCESSING.

4.1. The processing of personal data must be carried out on a lawful and fair basis.

4.2. The processing of personal data should be limited to achieving specific, predetermined and legitimate goals. Processing of personal data incompatible with the purposes of personal data collection is not allowed.

4.3. It is not allowed to combine databases containing personal data, the processing of which is carried out for purposes incompatible with each other.

4.4. Only personal data that meets the purposes of their processing is subject to processing.

4.5. The content and volume of the processed personal data must correspond to the stated purposes of processing. The processed personal data should not be redundant in relation to the stated purposes of their processing.

4.6. When processing personal data, the accuracy of personal data, their sufficiency, and, if necessary, relevance to the purposes of personal data processing must be ensured. TV START takes the necessary measures to delete or clarify incomplete or inaccurate data.

4.7. The storage of personal data must be carried out in a form that allows you to identify the subject of personal data, no longer than the purposes of personal data processing require, unless the period of storage of personal data is established by federal law, an agreement to which the party, beneficiary or guarantor is the subject of personal data. The processed personal data is subject to destruction or depersonalization upon achievement of the processing goals or in case of loss of the need to achieve these goals, unless otherwise provided by federal law;

4.8. The processing of personal data should be carried out in such a way that, in relation to each category of personal data, it is possible to determine the places of storage (material media) and establish a list of persons who process personal data or have access to them.

## 5. THE BASIS OF DATA PROCESSING.

5.1. The legal grounds for processing TV START Data are, among others:

- the User's consent to the processing of his personal data;
- execution, as well as the conclusion of a User Agreement or other agreements with  
By the user;
- exercising the rights and legitimate interests of TV START or third parties, if the User's rights and freedoms are not violated;
- the need for processing in order to carry out creative activities, provided that the rights and legitimate interests of the User are not violated;
- processing for statistical or other research purposes, subject to mandatory depersonalization of Data;
- the need for processing in order to achieve the goals provided for by law, as well as the fulfillment of the duties assigned to TV START by legislation.

## 6. USER RIGHTS

6.1. The User has the right to:

- receive information regarding the processing of your Data;
- require TV START to clarify its Data, block or destroy them if they are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing;
- withdraw consent to the processing of your Data by sending a written application to TV START;
- take measures provided for by the legislation of the Russian Federation to protect their rights.

6.2. The User has the right to delete the Account created by him and the Data transmitted by TV START by sending a corresponding request from his e-mail address to the address of the TV START support service [support@tvstart.ru](mailto:support@tvstart.ru) .

## 7. GENERAL REQUIREMENTS FOR DATA PROCESSING OPERATIONS.

7.1. TV START can receive Users' personal data in the following ways:

- from the User;
- from publicly available sources of personal data;

- from the operator of personal data, as a person who processes personal data on the basis of a contract (on behalf of the operator with the consent of the User);
- by other legal means.

7.2. When collecting personal data, TV START is obliged to provide the User, at his request, with information provided for by federal law:

- confirmation of the fact of personal data processing;
- legal grounds and purposes of personal data processing;
- methods of personal data processing used;
- name and location of TV START, information about persons (with the exception of TV START employees) who have access to personal data or to whom personal data may be disclosed on the basis of a contract with TV START or on the basis of federal law;
- processed personal data related to the relevant User, the source of their receipt, unless another procedure for submitting such data is provided for by federal law;
- terms of processing personal data, including the terms of their storage;
- the procedure for the User to exercise the rights provided for by federal law;
- information about the performed or about the proposed cross-border transfer of data;
- the name or surname, first name, patronymic and address of the person processing personal data on behalf of TV START, if processing is entrusted or will be entrusted to such a person;
- other information provided for by federal law.

7.3. If the provision of personal data is mandatory in accordance with federal law, TV START is obliged to explain to the User the legal consequences of refusing to provide his personal data.

7.4. When collecting personal data, including through the Internet information and telecommunications network, TV START is obliged to ensure the processing of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, unless otherwise provided by federal law.

7.5. TV START does not collect and subsequently process special categories of personal data, except in the following cases:

- The user has given written consent to the processing of his personal data;
- personal data has been made publicly available by the subject;
- personal data processing is carried out in accordance with the legislation on state social assistance, labor legislation, pension legislation of the Russian Federation;
- processing of personal data is necessary to protect the life, health or other vital interests of the subject or the life, health or other vital interests of other persons and obtaining the User's consent is impossible;

- processing of personal data is necessary to establish or exercise the rights of the User or third parties, as well as in connection with the administration of justice;
- the processing of personal data is carried out in accordance with the legislation on compulsory types of insurance, with the insurance legislation.

7.6. The User's consent to the processing of personal data must be obtained strictly before the processing of personal data begins.

## 8. STORAGE AND PROTECTION OF DATA ACCESS.

8.1. The confidentiality regime with respect to Data is lifted:

- in case of depersonalization;
- after 75 years of their storage period;
- in other cases provided for by federal laws of the Russian Federation.

8.2. The confidentiality of personal data is established on the basis of the applicable requirements of the federal law of the Russian Federation.

8.3. To ensure protection against unauthorized access to Data in TV START, those responsible for ensuring data security are appointed;

8.4. A data protection system is being created, including:

- organizational measures to ensure data security;
- technical measures to ensure data security.

## 9. THE PROCEDURE FOR DATA DESTRUCTION.

9.1. With respect to User Data processed by TV START in the cases specified in clause 3.2.

For the purposes of the Policy, there is a single procedure for their destruction in accordance with the legislation of the Russian

Federation and local regulations of TV START.

9.2. The Data is subject to destruction by TV START, in particular, if the purpose of processing has been achieved

or the User has withdrawn consent to their processing (and there are no other grounds for processing such Data), or the fact of their illegal processing has been revealed.

9.3. If the data processing goal is achieved, TV START stops processing them and destroys them within a period not exceeding 30 days from the date of achievement of the processing goal. If the User withdraws consent to the processing of his Data, TV START stops processing them and

, if Data retention is no longer required for the purpose of processing, destroys them within a period not exceeding 30 days from the date of receipt of the specified recall.

9.4. In case of detection of illegal processing of personal data carried out by TV START, within a period not exceeding 3 working days from the date of this detection, TV START stops such processing. If it is impossible to ensure the legality of such processing, TV START destroys such Data within a period not exceeding 10 working days from the date of detection of illegal processing. At the same time, TV START notifies the User about the elimination of violations or the destruction of Data.

## 10. OTHER

10.1. The original Russian version of the PRIVACY POLICY shall prevail over versions in other languages.

10.2. The User is responsible for the legality of the provision, relevance and reliability of the data of the User and other persons that the User provides to TV START.

10.3. TV START considers requests related to the Policy, including User requests regarding the use of their Data at: [support@tvstart.ru](mailto:support@tvstart.ru) , or by sending to the address: 32A Elektrozavodskaya str., Moscow, 107023.

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