

Confidentiality Policy

1. General Provisions.

1.1. This confidentiality policy (hereinafter the Policy) shall govern the terms and conditions of collection, processing, storage, and protection of the following personal data of registered and unregistered users (hereinafter referred to as users) of the website <https://forum.rusgrain.org> (hereinafter the Website), which are not classified as special, biometric, and include: email address, telephone number, given name, patronymic, surname, country of registration, Taxpayer Identification Number (INN), IP address, job title, place of work, and other data that may be necessary for using a particular functionality of the Website, as well as in cases where it is necessary to contact the operator.

The user's device shall automatically transmit technical data: information saved in cookie files, information about the browser and its settings, date and time of access to the Website, addresses of requested pages, actions on the Website, technical characteristics of the device, IP address, etc.

1.2. The operator of personal data processed on the Website is the UNION OF GRAIN EXPORTERS AND PRODUCERS (Taxpayer Identification Number (INN) 7708356494) (hereinafter the Operator, the Union). The Operator shall apply legal, organizational, and technical measures to ensure the security of personal data in accordance with Article 19 of the Federal Law of the Russian Federation No. 152-FZ dd. July 27, 2006 "Concerning Personal Data".

1.3. Definitions and abbreviations used in this Policy:

- personal data shall mean any information relating to a directly or indirectly identified or identifiable individual (personal data subject);
- personal data operator (operator) shall mean a state body, municipal body, legal entity, or individual that independently or jointly with other persons organizes and/or carries out the processing of personal data, and also determines the purposes of personal data processing, the composition of personal data to be processed, the actions (operations) performed with personal data;
- processing of personal data shall mean any action (operation) or a set of actions (operations) performed with personal data, with or without the use of automation tools. Processing of personal data shall include, among other things:
 - o collection;
 - o recording;
 - o systematization;
 - o accumulation;
 - o storage;
 - o refinement (updating, modification);
 - o extraction;
 - o use;
 - o transfer (distribution, provision, making available);
 - o depersonalization;
 - o blocking;
 - o deletion;
 - o destruction.
- automated personal data processing shall mean processing of personal data using computer equipment;
- distribution of personal data shall mean actions aimed at disclosing personal data to an unspecified group of persons;

- provision of personal data shall mean actions aimed at disclosing personal data to a specific person or a specific group of persons;
- personal data blocking shall mean temporary suspension of personal data processing (except for cases where processing is necessary to refine personal data);
- destruction of personal data shall mean actions resulting in impossibility to restore the content of personal data in the personal data information system and/or destruction of tangible carriers of personal data are destroyed;
- depersonalization of personal data shall mean actions resulting in impossibility to determine whether the personal data belong to a specific personal data subject without the use of additional information;
- personal data information system shall mean a set of personal data contained in the personal data databases and information technologies and technical means ensuring their processing.

2. Purpose of Processing Personal Data of Personal Data Subjects.

2.1. The Operator shall process users' personal data for the purpose of providing users with access to the use of the Website's functionality:

- registration and provision of access to the functionality of the Operator's website,
- providing the possibility of using the functionality of the Operator's website,
- preparation and holding of all-Russian, international, exhibition, business, public events and cultural events organized by the Union,
- creation of an account in the Unified Personal Account, provision of access to the use of the functionality, content, and services of the website, the Unified Personal Account,
- formation of reference materials for internal information support of the Union's activities,
- drafting, conclusion, performance, and termination of agreements with counterparties,
- providing the possibility to read news, review information, view video materials and photo materials, participate in events,
- providing the personal data subject with effective support, quality control, research on satisfaction with the quality of services provided,
- establishing direct contacts with the personal data subject by means of communication, including electronic means of communication, including for the purpose of informing by sending emails and/or by other means regarding participation in events organized and/or conducted by the Union and/or its partners, including event customers, about the status of review of the registration application by the Union, as well as informing about services, special offers,
- improving the quality of the Operator's services, convenience, developing new features and services of the Operator,
- execution of court decisions, acts of other bodies or officials subject to execution in accordance with the legislation of the Russian Federation concerning enforcement proceedings.

3. Subjects Whose Personal Data Are Processed by the Operator

3.1. The following subjects' personal data shall be subject to processing:

- 3.1.1. individuals who use the Operator's services (users),
- 3.1.2. individuals with whom agreements have been concluded,
- 3.1.3. other personal data subjects, whose processing is carried out for the purposes set forth in para. 2.1. of this Policy.

4. Procedure for Processing Personal Data

4.1. The users' personal data shall be processed in accordance with the legislation of the Russian Federation.

4.2. The personal data shall be processed by the Operator with the consent of the personal data subject to the processing of his/her personal data, unless otherwise provided by the legislation of the Russian Federation.

4.3. The Operator shall not disclose personal data to third parties or distribute personal data without the consent of the personal data subject, unless otherwise provided by the legislation of the Russian Federation.

4.4. The Operator shall carry out both automated and non-automated processing of personal data.

Processing of personal data shall mean collection, recording, systematization, accumulation, storage, refinement (updating, modification), extraction, use, transfer (provision, making available), depersonalization, blocking, deletion, destruction of personal data.

4.5. The Operator shall have the right to transfer personal data to inquiry and investigation bodies, other authorized bodies on the grounds provided for by the effective legislation of the Russian Federation.

4.6. The Operator may transfer users' personal data to a third party on the basis of an agreement concluded with such third party, subject to the consent of the personal data subject, as well as to achieve the purposes set forth in para. 2 of this Policy.

5. Ensuring Security During the Processing of Personal Data

5.1. The Operator shall take all necessary measures to protect users' personal data from unauthorized access, modification, disclosure, or destruction.

5.2. The Operator shall provide access to users' personal data only to those representatives of the Operator and/or partners/counterparties who require such information to ensure the functioning of the Website and to provide users with access to its use.

5.3. Measures taken by the Operator to protect the personal data of subjects:

- a person responsible for organizing the processing of personal data has been appointed;
- a person responsible for ensuring the security of personal data has been appointed;
- documents defining the Operator's policy regarding the processing of personal data and establishing procedures aimed at preventing and detecting violations of the law have been approved;
- legal, organizational, and technical measures to ensure the security and protection of personal data are being applied;
- internal control over the compliance of personal data processing with the legislation of the Russian Federation in this area is carried out in accordance with the internal audit plan of the Operator's Policy regarding the processing of personal data, the Operator's local acts;
- a personal data security threat model has been developed for the personal data information system, which, in determining the danger of threats, assesses the harm that may be caused to personal data subjects in the event of a violation of the law;
- an assessment of the effectiveness of the measures taken to ensure the security of personal data has been carried out;

- rules of access to personal data have been approved in the relevant regulation and are being technically implemented using information security tools;
- storage of personal data is organized in compliance with conditions that prevent unauthorized access to them;
- other measures established by the legislation of the Russian Federation.

6. Rights of Personal Data Subjects

6.1. Personal data subjects shall have the following rights:

6.1.1. The right to access his/her personal data;

6.1.2. The right to obtain information concerning the processing of his/her personal data;

6.1.3. The right to demand that the Operator refine, block or destroy personal data if such personal data are incomplete, outdated, inaccurate, unlawfully obtained, or are not necessary for the stated purpose of processing, as well as to take measures provided by law to protect his/her rights;

6.1.4. The right to withdraw his/her consent to the processing of personal data;

6.1.5. The right to appeal the actions or inactions of the Operator;

6.1.6. To exercise other rights established by the legislation of the Russian Federation.

6.1.7. A personal data subject may exercise his/her rights to obtain information concerning the processing of his/her personal data by the Operator, and to review the personal data belonging to the subject and processed by the Operator, by sending a written request to the address: Sadovaya-Spasskaya str., 11/1, premises/room XLII / 49, 51, 107078, Moscow, or to info@rusgrain.org.

6.1.8. In accordance with part 3 of Article 14 of the Federal Law No. 152-FZ dd. July 27, 2006 “Concerning Personal Data”, a request from a personal data subject (or his/her representative) must contain:

- the number of the main identity document of the personal data subject or his/her representative, information on the date of issue of the said document and the issuing authority;
- information confirming the participation of the personal data subject in relations with the Operator (agreement number, date of entry into the agreement, conventional verbal designation and/or other information), or information otherwise confirming the fact of processing of personal data by the Operator;
- the signature of the personal data subject or his/her representative.

6.2. The User shall be responsible for the accuracy, relevance, completeness, and compliance with the legislation of the Russian Federation of the information provided during registration and its freedom from claims of third parties.

7. Obligations of the Operator to Protect Personal Data.

7.1. The Operator shall be obliged to take the necessary organizational and technical measures to ensure the confidentiality, integrity, and availability of users’ personal data in accordance with:

— the Federal Law of the Russian Federation No. 149-FZ dd. July 27, 2006 “Concerning Information, Information Technologies and Information Protection”;

— the Federal Law of the Russian Federation No. 152-FZ dd. July 27, 2006 “Concerning Personal Data” (as amended by the Federal Law No. 205-FZ dd. July 23, 2013);

— the Decree of the Government of the Russian Federation No. 1119 dd. November 1, 2012 “Concerning the Approval of the Requirements for the Protection of Personal Data upon its Processing in Personal Data Information Systems”;

— the Order of the Federal Service for Technical and Export Control of Russia No. 21 dd. 18.02.2013 “Concerning the Approval of the Composition and Content of Organizational and

Technical Measures to Ensure the Security of Personal Data during Their Processing in Personal Data Information Systems”;

— Other regulatory legal acts of the Russian Federation binding on the Operator.

7.2. The Operator shall be obliged to publish or otherwise ensure unlimited access to the document defining the Operator’s policy regarding the processing of personal data.

7.3. The Operator shall be obliged to ensure the processing of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation.

7.4. The Operator shall cease processing the user’s personal data upon the latter’s sending a request in electronic and written form to the Operator’s address: Sadovaya-Spasskaya str., 11/1, premises/room XLII / 49, 51, 107078, Moscow or info@rusgrain.org, demanding to cease processing his/her personal data.

7.5. The Operator shall perform other duties established by the effective legislation of the Russian Federation.

7.6. The Operator shall not be liable for the completeness and accuracy of the information provided by the personal data subject.

8. Storage of Personal Data

8.1. Personal data of subjects may be obtained, processed, and transferred for storage both in hard copy and in electronic form.

8.2. Personal data shall be stored in a form that permits identification of the personal data subject no longer than required by the purposes of their processing, and they shall be subject to destruction upon achieving the purposes of processing, expiration of the subject’s consent to the processing of personal data, in the event of withdrawal of the personal data subject’s consent, and in other cases established by the legislation of the Russian Federation.

9. Amendment of the Confidentiality Policy.

9.1. The personal data operator shall have the right to amend this policy on the processing and protection of personal data without prior notice to users.

9.2. Amendments to this policy on the processing and protection of personal data shall come into force after its publication on the Website. The User shall independently monitor these amendments.