

POLICY OF PERSONAL DATA PROCESSING

Last updated:
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1. GENERAL

1.1. This Policy of Personal Data Processing (hereinafter – the “Policy”) has been developed to the satisfaction of the provisions of Article 18.1, part 1, item 2 of Federal Law No. 152-FZ “On Personal Data” dated July 27, 2006 (hereinafter – the “Personal Data Law”) to protect human and civil rights and freedoms during personal data processing, including protection of the rights of privacy, personal and family secret.

1.2. This Policy shall apply to the personal data of the contestants processed by the Data Operator.

1.3. The main terms used herein shall be as follows:

Personal Data shall mean any information relating, directly or indirectly, to an identified or identifiable natural person (data subject);

Personal Data Operator (Data Operator) shall mean Autonomous Nonprofit Organization “Academy of Contemporary Art”, OGRN 1217700226820, INN/KPP 9701177394/770101001, 22, bld. 1, prem. I, Myasnitskaya str., Moscow, 101000, which, alone or jointly with third parties, arranges for and (or) carries out personal data processing and determines the purposes of such processing, the composition of personal data to be processed and the actions (operations) performed on personal data;

Personal Data Processing shall mean any action (operation) or a set of actions (operations) which is performed on personal data, whether or not by automated means. The personal data processing shall include: collection, recording, systematization, accumulation, storage, rectification (update, modification), extraction, use, transmission (dissemination, disclosure, and access), depersonalization, blocking, erasure, and destruction;

Personal Data Processing Automation shall mean computer-aided processing of personal data;

Personal Data Dissemination shall mean any actions aimed at disclosure of personal data to an indefinite scope of persons;

Personal Data Disclosure shall mean any actions aimed at disclosure of personal data to a certain person or a definite scope of persons;

Personal Data Blocking shall mean temporary cessation of personal data processing (unless the processing is required to update personal data);

Personal Data Destruction shall mean any actions resulted in irrevocable destruction of personal data that cannot be further restored in the personal data information system and (or) destruction of personal data material carriers;

Personal Data Depersonalization shall mean actions resulted in impossibility to identify, without using additional information, that personal data are related to a particular Personal Data Owner;

Personal Data Information System shall mean a set of personal data contained in databases and information technologies and technical means providing its processing;

Website shall mean a set of computer programs and other information contained in the information system that is found on the Internet at: <http://www.ourgeneration.tv/>.

1.4. Basic Rights and Obligations of the Data Operator.

1.4.1 The Data Operator shall have the right to:

- independently determine the composition and list of measures necessary and sufficient to ensure fulfillment of the obligations stipulated by the Personal Data Law and regulations adopted thereunder, unless otherwise provided by the Personal Data Law or other federal laws;
- entrust the processing of personal data to a third party with the consent of the Personal Data Owner, unless otherwise provided by the federal law, on the basis of an agreement concluded with that party. The party engaged in personal data processing by instruction of the Operator shall be obliged to comply with the principles and rules of personal data processing provided for by the Personal Data Law; and
- if the Personal Data Owner withdraws the consent to processing of personal data, the Operator shall have the right to continue processing personal data without the consent of the Personal Data Owner on the grounds specified in the Personal Data Law.

1.4.2. The Data Operator shall be obliged to:

- organize processing of personal data in the manner prescribed by the Personal Data Law;
- respond to requests and inquiries from Personal Data Owners and their legal representatives in accordance with the requirements of the Personal Data Law; and
- provide to the body authorized to protect the rights of Personal Data Owners (hereinafter – the “Federal Service for Supervision of Communications, Information Technology, and Mass Media” or “Roscomnadzor”) at its request the necessary information within 30 days from the date of such request.

1.5. Basic Rights and Obligations of the Personal Data Owners. The Personal Data Owner shall have the right to:

- receive information regarding processing of their personal data, with the exceptions provided for by the federal laws. The information shall be provided to the Personal Data Owners by the Operator in an accessible form, and it should not contain personal data relating to other Personal Data Owners, unless there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Personal Data Law;
- require the Operator to clarify their Personal Data, block or destroy them if the personal Data are 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;

- appeal to Roscomnadzor or in court any illegal actions or omission of the Operator when processing their personal data.

The Personal Data Owner can exercise the right to receive information regarding processing of their personal data or the right to clarify, block or destroy their personal data by sending the relevant request to the Data Operator by mail at: **22, bld. 1, prem. I, Myasnitskaya str., Moscow, 101000**, or by sending the relevant request to the Data Operator by e-mail info@ourgeneration.tv. In either case the request shall be made in accordance with the requirements of Article 5.1 hereof.

1.6. Control over compliance with the requirements of this Policy shall be exercised by an authorized officer of the Operator responsible for organization of personal data processing.

1.7. Liability for failure to comply with the requirements of the legislation of the Russian Federation and the Operator's by-laws on the personal data processing and protection shall be determined in accordance with the laws of the Russian Federation.

2. LEGAL GROUNDS FOR PERSONAL DATA PROCESSING

2.1. The legal grounds for personal data processing shall be a set of legal acts pursuant to and in accordance with which the Operator processes personal data, including:

- Constitution of the Russian Federation;
- Civil Code of the Russian Federation; and
- other regulations governing the activity of the Operator.

2.2. The legal grounds for personal data processing shall also include:

- the Operator's Articles of Association; and
- the consent of the Personal Data Owner to personal data processing.

3. PERSONAL DATA PROCESSING PURPOSES, SCOPE AND PROCEDURE

3.1. Processing of personal data shall be limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data that is incompatible with the purposes of personal data collection shall not be allowed. Only personal data that meet the purposes of its processing shall be subject to processing.

3.2. The content and scope of the processed personal data shall correspond to the stated purposes of the processing as set forth herein.

3.3. The redundancy of the processed personal data in relation to the stated purposes of their processing shall not be allowed.

3.4. The Operator can process personal data of the contestants based on the provisions hereof.

3.4.1. The purposes of processing of personal data of the contestants by the Operator shall include:

- to determine eligibility of the participants for the Contest Rules published on the Operator's Website;
- to short-list the candidates for the semi-final of the Contest; and
- to enable contact with the contestants during the Contest organization and holding, including preparation and holding of the award ceremony for the Contest winners.

3.4.2. The Operator shall process for the purposes above the following categories of personal data of the contestants:

- Full name of the contestant;
- Stage name;
- Country of residence;
- City of residence;
- Date of birth;
- Contact person (legal representative);
- Mobile of the contact person (legal representative);
- E-mail;
- Song name;
- Full name of the author of lyrics of the contest song;
- Full name of the composer of the contest song;
- File of the song record (Contest song soundtrack);
- File of the song record (Contest song backing track);
- Link to video of the contestant's performance on the stage;
- Contestant's producer or right holder;
- Link to the contestant's social media page; and
- File of the contestant's photographic images.

3.4.3. Processing of biometric personal data of the contestants (data describing a person's physiological and biological characteristics allowing establishing identity) is not carried out by the Operator.

3.4.4. Processing of the special categories of personal data of the contestants is not carried out by the Operator.

3.4.5. The Operator shall perform mixed processing of personal data of the contestants.

3.4.6. The list of actions for processing of personal data of the contestants shall include collection, recording, systematization, accumulation, storage, rectification (update, modification), extraction, use, transmission (dissemination, disclosure, and access), depersonalization, blocking, erasure, and destruction.

3.4.7. Disclosure to third parties or dissemination of personal data without the consent of the contestants shall not be allowed, unless otherwise provided by the federal law.

3.4.8. Upon the consent of the contestants the Operator may entrust processing of their personal data in the country to third parties on the basis of agency agreements concluded with such third parties.

3.4.9. Cross-border transfer of personal data of the contestants is not carried out by the Operator.

4. PRINCIPLES AND CONDITIONS OF PERSONAL DATA PROCESSING

4.1. The personal data processing by the Operator shall be carried out in accordance with the statutory requirements of the Russian Federation and on the basis of the following principles:

- legality and fair basis;
- restrictions on personal data processing by achievement of specific pre-defined and legitimate purposes;
- prevention of personal data processing incompatible with the purposes of collecting personal data;
- prevention of unification of databases containing personal data where processing is carried out for purposes incompatible with each other;
- processing only of the personal data that meet the objectives of their processing;
- compliance of content and scope of processed personal data with the stated processing objectives;
- denial of processing the personal data that are redundant in relation to the stated purposes of their processing;
- ensuring accuracy, sufficiency and relevance of personal data in relation to the purposes of personal data processing; and
- destruction or depersonalization of personal data upon achievement of the purpose of their processing or in case of irrelevance of the need to achieve these objectives, if the Operator can not eliminate the breach in personal data processing, unless otherwise provided by the federal law.

4.2. Personal data processing shall be carried out with the consent to processing on the part of a Personal Data Owner or without such consent in the cases provided for by the laws of the Russian Federation;

4.3. Only employees of the Operator responsible for the personal data processing shall be allowed to process personal data.

4.4. The personal data shall be processed by:

- obtaining personal data orally or in writing directly from the Personal Data Owner, including via the Website; or
- obtaining personal data from publicly available sources.

4.5. Persons provided to the Operator information about another Personal Data Owner, including via the Website, without the consent of such Owner whose personal data was provided shall be held liable in accordance with the legislation of the Russian Federation.

4.6. For the purpose of information provision the Operator may create public sources of personal data owners. The following may be included in the publicly available sources of personal data, with a written consent of a Personal Data Owner: last name, first name, patronymic name, stage name, home country, home city, date of birth, link to the contestant's social media page, contestant's photo and other personal data reported by the Personal Data Owner. The information about the Personal Data Owner shall be deleted at any time from publicly available personal data sources at the request of the Personal Data Owner, the body authorized to protect the rights of Personal Data Owners or by court order.

4.7. The Operator shall take all reasonable legal, organizational and technical measures to protect personal data from unauthorized or accidental access or their destruction, modification, blocking, dissemination or other unauthorized operations, including:

- identify threats to personal data security in the course of their processing;
- adopt by-laws and other documents governing personal data processing and protection;
- appoint officials responsible for protection of personal data in the Operator's structural subdivisions and information systems;
- create necessary conditions for work with personal data;
- organize due accounting of documents containing personal data;
- organize work with information systems for personal data processing;
- store personal data so as to enable their security and protection from unauthorized access; and
- organize training for the Operator's employees who process personal data.

4.8. The Operator shall store personal data in a form that makes it possible to determine the Personal Data Owner no longer than the purpose of processing personal data requires, unless the storage period for personal data is established by federal law or an agreement.

4.9. When personal data are collected, including by means of the Internet, the Operator shall record, systematize, accumulate, store, rectify (update, modify), extract personal data of the Russian citizens with the use of databases located within the Russian Federation.

5. UPDATING, RECTIFICATION, ERASURE AND DESTRUCTION OF PERSONAL DATA, RESPONSES TO REQUESTS OF PERSONAL DATA OWNERS FOR ACCESS TO PERSONAL DATA

5.1. The Operator provides confirmation of processing of personal data by the Operator, legal grounds and purposes of personal data processing, as well as any other information provided for by Article 14, part 7 of the Personal Data Law to the Personal Data Owner or their representative upon request or receipt of the relevant application from the Personal Data Owner or representative. The disclosed information shall not include any personal data relating to other Personal Data Owners, unless there are legal grounds for disclosing such personal data.

The request shall include:

- number of the primary ID document of the Personal Data Owner or their representative, its issue date and issuing authority;
- confirmation of relations between the Personal Data Owner and the Operator (agreement number, agreement date, reference verbal designation and (or) other information) or any information otherwise certifying processing of personal data by the Operator; and
- signature of the Personal Data Owner or their representative.

The request may be sent in electronic form and signed with the digital signature in accordance with the laws of the Russian Federation.

A substantiated refusal shall be sent if the request (application) of the Personal Data Owner does not contain all details envisaged by the Personal Data Law or the Personal Data Owner has no right of access to the requested information.

The right of the Personal Data Owner to access to their personal data may be restricted in accordance with Article 14, part 8 of the Personal Data Law, including if the access of the Personal Data Owner to their personal data infringes the rights and legal interests of third parties.

5.2. In case of revealing inaccuracies in personal data upon the application of the Personal Data Owner or their representative, or their request or upon request of Roscomnadzor the Operator shall block the personal data relating to such Personal Data Owner from the date of receipt of such request or application for the period of verification provided that such blocking does not infringe the rights and legal interests of the Personal Data Owner or third parties.

If any such inaccuracy in personal data is confirmed the Operator shall update personal data based on the information submitted by the Personal Data Owner, their representative or Roscomnadzor or any other relevant information within seven days from submission of such information and shall unblock personal data.

5.3. In case if any illegal processing of personal data is revealed upon request (application) of the Personal Data Owner, their representative or Roscomnadzor the Operator shall block any illegally processed personal data relating to such Personal Data Owner from the date of receipt of such application or request.

5.4. Upon achievement of the processing purposes or withdrawal of the consent to personal data processing by the Personal Data Owner personal data shall be destroyed unless:

- an agreement, to which the Personal Data Owner is a party, provides for otherwise;
- the Operator has the right to process personal data without the consent of the Personal Data Owner on the grounds provided for by the Personal Data Law or other federal laws; or
- otherwise provided for by any other agreement between the Operator and the Personal Data Owner.

6. CONCLUDING PROVISIONS

6.1. The Operator may only send to the Personal Data Owner promotional and informational materials on educational and creative development services and creativity contests organized by the Operator by e-mail, text and push messages subject to prior written consent to receiving promotional materials according to Article 18, part 1 of Federal Law No. 38-FZ “On Advertising” dated March 13, 2006. Such consent to receiving promotional materials from the Operator by e-mail, text and push messages shall be made in written or electronic form by ticking the relevant box on the Website.

Refusal to receive promotional materials can be given by the Personal Data Owner by following the relevant link in the electronic messages sent by the Operator, sending a notice of refusal to receive promotional materials to the Customer Service to the Operator at: **22, bld. 1, prem. I, Myasnitskaya str., Moscow, 101000**, or sending the relevant request to the Operator to e-mail: info@ourgeneration.tv.

6.2. Subject to the provisions of Article 18.1, part 2 of the Personal Data Law this Policy is publicly available (and is regularly updated) on the Website on the Internet at: <http://www.ourgeneration.tv>.

CONSENT TO PERSONAL DATA PROCESSING

Hereby I, acting in my own name, voluntarily and without being misled, by ticking “I hereby give my consent to personal data processing” and sending the completed form, **give my consent to the following personal data operator:**

Autonomous Nonprofit Organization “Academy of Contemporary Art”, OGRN 1217700226820, INN/KPP 9701177394/770101001, 22, bld. 1, prem. I, Myasnitskaya str., Moscow, 101000 (hereinafter – the “Operator”);

to processing, whether in documentary and/or electronic form, including collection, recording, systematization, accumulation, storage, rectification (update, modification), extraction, use, transmission (dissemination, disclosure, and access), depersonalization, blocking, erasure, and destruction of the following personal data:

- Full name of the contestant;
- Stage name;
- Country of residence;
- City of residence;
- Date of birth;
- Contact person (legal representative);
- Mobile of the contact person (legal representative);
- E-mail;
- Song name;
- Full name of the author of lyrics of the contest song;
- Full name of the composer of the contest song;
- File of the song record (Contest song soundtrack);
- File of the song record (Contest song backing track);
- Link to video of the contestant’s performance on the stage;
- Contestant’s producer or right holder;
- Link to the contestant’s social media page; and
- File of the contestant’s photographic images.

for the following purposes: to determine eligibility of the participants for the Contest Rules published on the Operator’s Website; to short-list the candidates for the semi-final of the Contest; and to enable contact with the contestants during the Contest organization and holding, including preparation and holding of the award ceremony for the Contest winners.

Processing of personal data shall cease upon achievement of the purposes of personal data processing, receipt of withdrawal of the consent to personal data processing or exclusion of the Operator from the Unified State Register of Legal Entities.

This consent may be withdrawn by sending the relevant written notice to the Operator to the Operator’s location address: **22, bld. 1, prem. I, Myasnitskaya str., Moscow, 101000**, or by sending the relevant request to the Operator to e-mail: info@ourgeneration.tv. In such case the Operator shall cease to process personal data and

personal data shall be destroyed unless the laws of the Russian Federation provide for any other legal grounds for processing.

The Operator shall process personal data in strict compliance with the Policy for Personal Data Processing published on the Website at <http://www.ourgeneration.tv> and the provisions of Federal Law No. 152-FZ “On Personal Data” dated July 27, 2006.

CONSENT TO RECEIVING PROMOTIONAL AND INFORMATIONAL MATERIALS AND RELATED PERSONAL DATA PROCESSING

Hereby I, acting in my own name, voluntarily and without being misled, by ticking “**I hereby give my consent to receiving news and promotional materials**” and sending the completed form, give my consent to receiving promotional and/or informational materials by e-mail and text messages the following advertiser and personal data operator:

Autonomous Nonprofit Organization “Academy of Contemporary Art”, OGRN 1217700226820, INN/KPP 9701177394/770101001, 22, bld. 1, prem. I, Myasnitskaya str., Moscow, 101000 (hereinafter – the “Operator”);

This consent is given for the purpose of prompt receipt of promotional and informational materials on educational and creative development services and creativity contests organized by the Operator. Therefore I hereby give the Operator my consent to processing, including collection, recording, systematization, accumulation, storage, rectification (update, modification), extraction, use, transmission (dissemination, disclosure, and access), depersonalization, blocking, erasure, and destruction of the following personal data:

- Last name, first name and patronymic name;
- E-mail address; and
- Contact phone number.

I hereby confirm that I have been informed that I have the right to withdraw this consent and to refuse to receive promotional materials at any time within the term hereof by following the relevant link in the electronic messages sent by the Operator, sending a notice of refusal to receive promotional materials to the Customer Service to: **22, bld. 1, prem. I, Myasnitskaya str., Moscow, 101000**, or sending the relevant request to the Operator to e-mail: info@ourgeneration.tv. In such case the Operator shall cease to process personal data and personal data shall be destroyed unless the laws of the Russian Federation provide for any other legal grounds for processing.

Processing of personal data shall cease upon achievement of the purposes of personal data processing, receipt of withdrawal of the consent to receiving news and promotional materials and/or personal data processing or exclusion of the Operator from the Unified State Register of Legal Entities.

The Operator shall process personal data in strict compliance with the Policy for Personal Data Processing published on the Website at <http://www.ourgeneration.tv> and the provisions of Federal Law No. 152-FZ dated July 27, 2006.