

# Personal Data Processing and Protection Policy of the Intersputnik International Organization of Space Communications

This personal data processing and protection policy (hereinafter – "Policy") is applicable to all information that the Intersputnik International Organization of Space Communications (hereinafter – "Personal Data Operator" or "Operator") may obtain about a user (hereinafter – "User") and/or about a third person, on whose behalf and in whose interests the User acts during the use of the website [www.openteleport.com](http://www.openteleport.com) (hereinafter – "Website"), its services, software, and products.

This Policy was formulated on the basis of and in accordance with Article 24 of the Constitution of the Russian Federation, Federal Law of 07/27/2006 No. 152-FZ "On Personal Data", and other regulatory acts of the Russian Federation.

The purpose of this Policy is to provide individuals, who make their personal data available, with the necessary information, allowing them to assess what personal data and for what purposes are handled by the Operator, what methods of security are employed.

This policy makes sure that the rights and freedoms of parties or individuals are protected when their personal data is processed using automatic equipment or without using such equipment.

By using services of the Operator or informing the Operator of their personal data directly or through third parties, Users of the Website acknowledge their consent to the processing of personal data in accordance with this Policy.

Consent to the processing of personal data may be recalled by the data subject. In the event that the personal data subject withdraws his/her consent to the processing of personal data, the Operator may continue processing personal data without the consent of the data subject if there are grounds stipulated by the effective laws of the Russian Federation.

## 1. GENERAL

1.1. In this Policy, a User's personal information means:

1.1.1. Personal information that a User provides on his/her own about him/herself at registration (creating an account) or in the process of using feedback forms and other services of the Website, including personal data of the User. Any information, which is required to be provided, is marked in a special way. Other information is provided by the User at his/her discretion.

1.1.2. Data that are automatically transmitted to the services of the Website in the process of their use by software installed in the User's device, including the IP address, cookie data, information about the User's browser (or other program with which services can be accessed), specifications of equipment and software used by the User, date and time of access to services, addresses of the requested pages, and other similar information.

1.1.3. Other information on the User, which needs to be processed in order to use the Website.

1.1.4. This Policy is applicable only to the Website [www.openteleport.com](http://www.openteleport.com). The Operator does not control and is not responsible for third-party websites, to which the User can navigate through links available on the Website [www.openteleport.com](http://www.openteleport.com).

## **2. PURPOSE OF PROCESSING PERSONAL INFORMATION OF USERS**

2.1. The Website collects and stores only personal information that is necessary for the provision of services or execution of agreements and contracts with the User, with the exception of cases when the laws of the Russian Federation provide for mandatory storage of personal information for a certain statutory period.

2.2. The Operator processes personal data so that it can operate, act in its legitimate interests, and have its requirements met. The purpose of processing personal data is as follows:

2.2.1. Identification of the User registered on the Website.

2.2.2. Providing the User's access to Website resources.

2.2.3. Securing of User feedback, including sending notifications, requests concerning the use of the Website, provision of services, handling queries and requests from the User.

2.2.4. Determination of the location of the User to ensure security, and prevent fraud.

2.2.5. Confirmation of the reliability and completeness of the personal data provided by the User.

2.2.6. Creating an account to use personalized resources of the Website, if the User expressed his/her intention to create an account.

2.2.7. Providing the User with efficient customer and technical support in case of problems related to the use of the Website.

2.2.8. Notification of the User of any Website updates, giving notices, and sending requests related to the provision of services with the User's consent.

## **3. CONDITIONS OF PROCESSING USER PERSONAL INFORMATION AND ITS DISCLOSURE TO THIRD PARTIES**

3.1. A User's personal information remains confidential, except if made public voluntarily. In such cases, the User agrees that a certain part of his/her personal information becomes public.

3.2. The Operator has the right to disclose personal information to third parties in the following cases:

3.2.1. The user agrees to such disclosure.

3.2.2. The disclosure is necessary for the User to use a particular service or for the performance of an agreement or contract with the User.

3.2.3. Information is disclosed as required by Russian or other applicable laws according to the procedure set forth in such laws.

3.2.4. In the event that the Website is sold, the purchaser assumes all obligations for compliance with this Policy with respect to personal information received.

3.3. A user's personal data is processed without time limitations in any lawful manner, including processing in personal data information systems using automatic equipment or without using such equipment. Processing of personal data of Users shall be in accordance with the Federal Law of 07/27/2006 No. 152-FZ "On Personal Data".

3.4. The Operator guarantees that there are taken organizational and technical measures to protect personal information from unauthorized or accidental access, destruction, alteration, blocking, copying, distribution, as well as from other unlawful handling by third parties.

## **4. OBLIGATIONS OF THE PARTIES**

4.1. The User undertakes

4.1.1. to provide personal data information required for the use of the Website.

4.1.2. to update personal data information in the event of changes to such information.

4.2. The operator undertakes

4.2.1. to use the information solely for the stated purposes.

4.2.2. to keep confidential information secret, not to disclose it without the prior written permission of the User, and not to sell, exchange, publish, disclose or transmit a User's personal data by any other means, except as set forth in this Policy.

4.2.3. to take precautions to protect the confidentiality of a User's personal data in the manner normally used to protect this kind of information in the current business practice.

4.2.4. to block personal data related to a User immediately upon request of the User or his/her representative at law or a body authorized to protect the rights of personal data subjects for a period of verification in the event of identification of inaccurate personal data or misconduct.

## **5. PERSONAL DATA PROTECTION**

5.1. The Operator processes personal data in information systems based on the principles of protecting the confidentiality of the information received.

5.2. The security of personal data being processed in information systems of the Operator is provided using an information security system, including: organizational measures using restrictions of physical access to premises, software and hardware protection measures.

5.3. Personal data is exchanged while being processed in information systems via communication channels protected by information security facilities.

5.4. The processing of personal data in information systems of the Organization includes the following:

- use of techniques preventing unauthorized access to personal data and (or) their disclosure to persons, not having rights to access such information;
- timely detection of any unauthorized access to personal data;
- prevention of impact on the technical facilities for the automated processing of personal data, which may violate their functioning;
- immediate recovery of personal data modified and destroyed due to unauthorized access to them;
- constant control of the level of protection of personal data.

5.5. In order to secure the level of protection of personal data required by Federal Law of 07/27/2006 No. 152-FZ "On Personal Data" and Federal Law of 07/27/2006 No. 149-FZ "On Information, Information Technologies, and on Information Protection", the Operator does not disclose information about specific means and methods of providing information security of personal data.

## **6. TIME OF PERSONAL DATA PROCESSING**

6.1. The time of personal data processing is determined depending on the purpose of processing in information systems of the Operator, in accordance with the terms of the agreement with the data subject, the limitation period, and other requirements of the laws of the Russian Federation and regulatory documents of the Operator.

## **7. ADDITIONAL TERMS**

7.1. The Operator may amend this Policy without the consent of the User.

7.2. The new edition of the Policy comes into force upon its posting on the Website, unless otherwise provided for in the new version of the Policy.

7.3. The effective version of the Policy is published on the web page at: [www.openteleport.com/privacy-policy/](http://www.openteleport.com/privacy-policy/).

## **8. FEEDBACK, QUESTIONS AND PROPOSALS**

8.1. All proposals, questions, and notices regarding this Policy are to be sent to [dir@intersputnik.com](mailto:dir@intersputnik.com) either to the headquarters address: 121099, Moscow, 2nd Smolensky pereulok, 1/4 or by phone +7 (495) 641 44 20.