

# Personal Data Processing Policy for the Website <https://fusionbrain.ai>

## 1. General Provisions

1.1. This Personal Data Processing Policy (hereinafter referred to as the "Policy") of LLC "Dalee Media," located at 127015, Moscow, intracity territory of the municipal district Savyolovsky, Butyrskaya St., 77 (hereinafter referred to as the "Operator"), is an official document that defines the general principles, purposes, and procedures for processing the personal data of users of the website <https://fusionbrain.ai> (hereinafter referred to as the "Website"), as well as information on the measures implemented to protect personal data.

1.2. This Policy has been developed in accordance with the legislation of the Russian Federation on personal data.

1.3. This Policy applies exclusively to the Website and the Platform. The Operator does not control and is not responsible for the actions of third parties to whom the User may navigate via links available on the Website.

1.4. This Policy comes into effect from the date of its approval and remains valid indefinitely until it is replaced by a new Policy, which will be posted on the Website.

1.5. This Policy is available at: [https://fusionbrain.ai/static/download/data\\_en.pdf](https://fusionbrain.ai/static/download/data_en.pdf).

## 2. Key Terms and Definitions

2.1. The following terms are used in this Policy:

**Processing of Personal Data** – any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including the collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

**Destruction of Personal Data** – actions resulting in the impossibility of restoring the content of personal data in the personal data information system and/or resulting in the destruction of tangible personal data carriers.

**Personal Data Operator (Operator)** – a state or municipal authority, legal entity, or individual who, independently or jointly with others, organizes and/or performs the processing of personal data, and determines the purposes of personal data processing, the composition of personal data to be processed, and the actions (operations) performed with personal data.

The Operator under this Policy, when using the Website/Platform, is LLC "Dalee Media," located at 127015, Moscow, intracity territory of the municipal district Savyolovsky, Butyrskaya St., 77.

**Personal Data Subject / Data Subject** – an individual, a citizen of the Russian Federation. The Subject has the right to ensure the protection of their rights and freedoms during the processing of their personal data, including the right to privacy, personal and family secrets. Users, within the context of this document, are the Data Subjects. Data Subjects under this Policy are the Users of the Website/Platform (Users).

**Personal Data** – any information relating directly or indirectly to an identified or identifiable individual (the personal data subject).

**Website / Platform User (User)** – any individual visiting the Website and using the information, materials, and services of the Website/Platform.

**Website** – a collection of interlinked web pages hosted on the Internet at a unique address (URL) and its subdomains - <https://fusionbrain.ai/>.

**Cookie** – a small piece of data sent by a web server and stored on the User's computer, which the web client or web browser sends back to the web server in an HTTP request each time an attempt is made to open the corresponding website page.

**IP Address** – a unique network address of a node in a computer network through which the User gains access to the Website.

**Law** – Federal Law "On Personal Data" dated 27.07.2006 No. 152-FZ.

**PDIS (Personal Data Information System)** – an information system for processing personal data.

**FusionBrain Platform / Platform** – a software package that includes websites hosted under the fusionbrain.ai domain and its subdomains, mobile applications, and software (Program, Application) hosted on these websites or in mobile applications.

### **3. Legal Grounds for Personal Data Processing**

3.1. The legal grounds for the processing of personal data by the Operator are:

- The Law;
- The Civil Code of the Russian Federation;
- The User Agreement (link: [https://fusionbrain.ai/static/download/agreement\\_en.pdf](https://fusionbrain.ai/static/download/agreement_en.pdf)), posted on the Website and accepted by the Data Subject when using the Website, and accepted by the Data Subject when using the Platform;
- The Agreement for the Provision of Access to the Functionality of the Platform and the Fusion Brain Software, posted on the Website at <https://fusionbrain.ai/> and accepted by the Data Subject when using the Platform under a paid plan;
- Federal laws and other regulatory legal acts in the field of personal data protection;
- The Users' consents to the processing of their personal data.

### **4. Purposes of Processing, Categories, and List of Processed Personal Data, Categories of Data Subjects, Methods and Terms of Processing**

4.1. The Operator determines the processes within which personal data is processed. For each personal data processing process, the Operator defines the purposes of personal data processing.

4.2. Personal data is processed by the Operator for the following purposes:

#### **4.2.1. Registration and authorization on the Website:**

- Categories of personal data processed: other personal data.

- List of personal data processed: email address; location data; type, version, language of operating system and browser; device type and screen resolution; pages accessed by the user; IP address; User Hash-ID; time spent viewing a web page; URL; HTTP referer; User Agent; HTTP Cookie.
- Actions performed by the Operator with personal data: collection, recording, systematization, accumulation, storage, updating (modification), retrieval, use, transfer (provision, access), blocking, deletion, destruction of personal data.
- Categories of data subjects: Users of the Website/Platform. Methods of personal data processing: automated.
- Terms of processing and storage: until the purposes of personal data processing are achieved or until consent is withdrawn.
- Procedure for destroying personal data: specified in section 4.3 of this Policy.
- In connection with this purpose, the Operator transfers personal data to the following persons:
  - PJSC "Sberbank" (TIN: 7707083893), Address: 19 Vavilova St., Moscow, 117312, Russia;
  - LLC "Cloud Technologies" (TIN 7736279160), Address: 23 Vavilova St., Bldg. 1, Room N1.207, Moscow, 117312, Russia.

#### **4.2.2. Communication with Users (including sending information messages, processing incoming requests, any informational materials, and responding to them):**

- Categories of personal data processed: other personal data.
- List of personal data processed: email address; location data; type, version, language of operating system and browser; device type and screen resolution; pages accessed by the user; IP address; User Hash-ID; time spent viewing a web page; URL; HTTP referer; User Agent; HTTP Cookie.
- Actions performed by the Operator with personal data: collection, recording, systematization, accumulation, storage, updating (modification), retrieval, use, transfer (provision, access), blocking, deletion, destruction of personal data.
- Categories of data subjects: Users of the Website/Platform. Methods of personal data processing: automated.
- Terms of processing and storage: until the purposes of personal data processing are achieved or until consent is withdrawn.
- Procedure for destroying personal data: specified in section 4.3 of this Policy.
- In connection with this purpose, the Operator transfers personal data to the following persons:
  - LLC "S-MARKETING" (TIN: 7736319695), Address: 19 Vavilova St., 3rd floor, Room B.03.016, Moscow, 117312, Russia;
  - LLC "Cloud Technologies" (TIN 7736279160), Address: 23 Vavilova St., Bldg. 1, Room N1.207, Moscow, 117312, Russia.

#### **4.2.3. Subscription to marketing/advertising newsletters:**

- Categories of personal data processed: other personal data.
- List of personal data processed: email address
- Actions performed by the Operator with personal data: collection, recording, systematization, accumulation, storage, updating (modification), retrieval, use, transfer (provision, access), blocking, deletion, destruction of personal data.

- Categories of data subjects: Users of the Website/Platform. Methods of personal data processing: automated.
- Terms of processing and storage: until the purposes of personal data processing are achieved or until consent is withdrawn.
- Procedure for destroying personal data: specified in section 4.3 of this Policy.
- Personal data is processed only if the User subscribes to the newsletter based on separate consent.
- In connection with this purpose, the Operator transfers personal data to the following persons:
  - PJSC “Sberbank” (TIN: 7707083893), Address: 19 Vavilova St., Moscow, 117312, Russia;
  - LLC "Cloud Technologies" (TIN 7736279160), Address: 23 Vavilova St., Bldg. 1, Room N1.207, Moscow, 117312, Russia.

#### **4.2.4. Maintenance of statistics and analysis of the Website/Platform performance, including the improvement and customization of the Website/Platform to meet users’ needs, preferences, and interests:**

- Categories of personal data processed: other personal data.
- List of personal data processed: email address; location data; type, version, language of operating system and browser; device type and screen resolution; pages accessed by the user; IP address; User Hash-ID; time spent viewing a web page; URL; HTTP referer; User Agent; HTTP Cookie.
- Actions performed by the Operator with personal data: collection, recording, systematization, accumulation, storage, updating (modification), retrieval, use, transfer (provision, access), blocking, deletion, destruction of personal data.
- Categories of data subjects: Users of the Website/Platform. Methods of personal data processing: automated.
- Terms of processing and storage: until the purposes of personal data processing are achieved or until consent is withdrawn.
- Procedure for destroying personal data: specified in section 4.3 of this Policy.
- In connection with this purpose, the Operator transfers personal data to the following persons:
  - PJSC “Sberbank” (TIN: 7707083893), Address: 19 Vavilova St., Moscow, 117312, Russia;
  - LLC "Cloud Technologies" (TIN 7736279160), Address: 23 Vavilova St., Bldg. 1, Room N1.207, Moscow, 117312, Russia;
  - LLC “Yandex” (TIN: 7736207543), Address: 16 Lev Tolstoy St., Moscow, 119021, Russia.

#### **4.2.5. Conducting marketing/advertising activities, statistical and analytical surveys, and research:**

- Categories of personal data processed: other personal data.
- List of personal data processed: email address; location data; type, version, language of operating system and browser; device type and screen resolution; pages accessed by the user; IP address; User Hash-ID; time spent viewing a web page; URL; HTTP referer; User Agent; HTTP Cookie.

- Actions performed by the Operator with personal data: collection, recording, systematization, accumulation, storage, updating (modification), retrieval, use, transfer (provision, access), blocking, deletion, destruction of personal data.
- Categories of data subjects: Users of the Website/Platform. Methods of personal data processing: automated.
- Terms of processing and storage: until the purposes of personal data processing are achieved or until consent is withdrawn.
- Procedure for destroying personal data: specified in section 4.3 of this Policy.
- In connection with this purpose, the Operator transfers personal data to the following persons:
  - PJSC "Sberbank" (TIN: 7707083893), Address: 19 Vavilova St., Moscow, 117312, Russia;
  - LLC "Cloud Technologies" (TIN 7736279160), Address: 23 Vavilova St., Bldg. 1, Room N1.207, Moscow, 117312, Russia;
  - LLC "Yandex" (TIN: 7736207543), Address: 16 Lev Tolstoy St., Moscow, 119021, Russia.

#### **4.2.6. Implementation of marketing/advertising activities through monitoring the behavior of the target audience, data enrichment (including segmentation and scoring), and audience targeting, including by showing personalized and non-personalized ads:**

- Categories of personal data processed: other personal data.
- List of personal data processed: email address; location data; type, version, language of operating system and browser; device type and screen resolution; pages accessed by the user; IP address; User Hash-ID; time spent viewing a web page; URL; HTTP referer; User Agent; HTTP Cookie.
- Actions performed by the Operator with personal data: collection, recording, systematization, accumulation, storage, updating (modification), retrieval, use, transfer (provision, access), blocking, deletion, destruction of personal data.
- Categories of data subjects: Users of the Website/Platform. Methods of personal data processing: automated.
- Terms of processing and storage: until the purposes of personal data processing are achieved or until consent is withdrawn.
- Procedure for destroying personal data: specified in section 4.3 of this Policy.
- In connection with this purpose, the Operator transfers personal data to the following persons:
  - PJSC "Sberbank" (TIN: 7707083893), Address: 19 Vavilova St., Moscow, 117312, Russia;
  - LLC "Cloud Technologies" (TIN 7736279160), Address: 23 Vavilova St., Bldg. 1, Room N1.207, Moscow, 117312, Russia.
  - LLC "Yandex" (TIN: 7736207543), Address: 16 Lev Tolstoy St., Moscow, 119021, Russia;
  - LLC "S-MARKETING" (TIN: 7736319695), Address: 19 Vavilova St., 3rd floor, Room B.03.016, Moscow, 117312, Russia.

#### **4.2.7. Payment processing for paid access plans to the Platform:**

- Categories of personal data processed: other personal data.
- List of personal data processed: Last name, first name, email address; electronic payment instrument number; transaction information; activities in LLC NCO "YooMoney" services;

loyalty program participation data; partner database identifiers; actions on NCO websites and mobile apps; statistical, technical, functional data types (e.g., action type, date and time, URL, device type, IP address, etc.); automatically transmitted technical data (e.g., cookies); any other information provided by the data subject during communication with NCO.

- Actions performed by the Operator with personal data: collection, recording, systematization, accumulation, storage, updating (modification), retrieval, use, transfer (provision, access), blocking, deletion, destruction of personal data.
- Categories of data subjects: Users of the Website/Platform. Methods of personal data processing: automated.
- Terms of processing and storage: until the purposes of personal data processing are achieved or until consent is withdrawn.
- Procedure for destroying personal data: specified in section 4.3 of this Policy.
- In connection with this purpose, the Operator transfers personal data to the following persons:
  - LLC NCO "YooMoney", Address: 82 Sadovnicheskaya St., Bldg. 2, Moscow, 115035, Russia.

#### 4.3. Procedure for Destruction of Personal Data:

4.3.1. The Operator stops processing personal data, destroys the data carriers, and deletes data from information systems in the following cases:

- Achievement of the purposes of processing or expiration of storage periods – within 30 days;
- Loss of the need to achieve processing purposes – within 30 days;
- Receipt of proof from the data subject or their legal representative that the data was unlawfully obtained or unnecessary – within 7 days;
- Inability to ensure the lawful processing of personal data – within 10 days;
- Withdrawal of consent by the data subject – within 30 days;
- Expiry of limitation periods for the legal relationship in the context of which processing was carried out.

4.3.2. As per Part 5, Article 21 of the Law, the Operator does not terminate processing or destroy data in the following cases:

- Otherwise provided by a contract involving the data subject;
- The Operator is entitled to process data without the subject's consent under Russian law;
- Legal storage periods under Russian law have not expired.

4.3.3. Destruction of data processed by automated means is carried out by a commission formed by the Operator's staff based on an order. Data is destroyed via OS/database management system tools. The destruction is documented by an act and an extract from the event log.

4.3.4. The act and extract must be kept for 3 years from the date of data destruction.

## 5. Cookie Usage Procedure

5.1. To maintain statistics and analyze the operation of the Website/Platform, the Operator processes the User's data using cookies if such use is permitted in the User's browser settings (i.e., if the saving of cookies is enabled).

5.2. The procedure for processing cookies is outlined in the Cookie Usage Policy available at: [https://fusionbrain.ai/static/download/cookies\\_en.pdf](https://fusionbrain.ai/static/download/cookies_en.pdf).

## **6. Procedure and Conditions for the Processing of Personal Data**

6.1. The processing of personal data is carried out by the Operator in accordance with the requirements of the legislation of the Russian Federation.

6.2. The processing of personal data is carried out with the consent of the personal data subjects, as well as without such consent in cases provided for by the legislation of the Russian Federation.

6.2.1. The Operator processes the User's personal data only if they are provided and/or sent by the User personally through special forms located on the Website/Platform or sent to the Operator by email. By filling out the relevant forms and/or sending their personal data to the Operator, the User expresses their consent to this Policy and gives explicit and informed consent to the transfer of such data to the Operator for subsequent processing.

6.2.2. The personal data subject independently decides on providing their personal data and gives consent freely, by their own will, and in their own interest.

6.3. The Operator performs automated processing of personal data.

6.4. Only those Operator employees whose job duties include the processing of personal data are permitted to process such data.

6.5. The Operator performs the following actions with personal data: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.

6.6. It is prohibited to store and place documents containing personal data in open electronic catalogs (file sharing systems) within information systems of personal data.

6.7. Personal data storage is carried out in a form that allows determining the subject of personal data no longer than required for the purposes of personal data processing.

6.8. Processing of biometric personal data and special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, health, or private life is not carried out on the Website/Platform.

6.9. The Operator does not process personal data for political campaigning purposes.

6.10. When processing personal data obtained via the Website/Platform, the Operator uses databases located in the territory of the Russian Federation.

6.11. The Operator does not verify the accuracy of the information provided by the User and assumes that the User provides accurate and sufficient information and keeps it up to date.

6.12. In case of detecting inaccurate personal data or their unlawful processing, the clarification and blocking of personal data are ensured according to the procedure and under the conditions established by the legislation of the Russian Federation.

6.13. The period of personal data processing is limited to the achievement of the purposes of personal data processing. The User may at any time withdraw their consent to the processing of personal data by sending the Operator a notice via email to the Operator's address marked "Withdrawal of consent to the processing of personal data."

## **7. Transfer of Personal Data to Third Parties**

7.1. For the purposes of achieving the personal data processing objectives set out in Section 4 of this Policy, the Subject permits and the Operator may transfer and receive personal data to/from third parties, namely:

- PJSC “Sberbank” (TIN: 7707083893), Address: 117312, Moscow, Vavilova St., 19;
- LLC “Cloud Technologies” (TIN: 7736279160), Address: 117312, Moscow, Vavilova St., 23, Bldg. 1, Room N1.207;
- LLC “S-MARKETING” (TIN: 7736319695), Address: 117312, Moscow, internal territory of the municipal district Akademichesky, Vavilova St., 19, 3rd floor, room B.03.016;
- LLC “YANDEX” (TIN: 7736207543), Address: 119021, Moscow, Leo Tolstoy St., 16;
- LLC NCO “YooMoney”, Address: 115035, Moscow, Sadovnicheskaya St., 82, Bldg. 2.

7.2. Transfer of personal data to the above entities is carried out on the basis of the provisions of an agreement (offer), the consent to the processing of personal data by the personal data subjects, and an instruction agreement concluded between the Operator and the entities processing personal data.

7.3. Entities processing personal data on the basis of an instruction agreement are obliged to comply with the principles and rules for processing and protecting personal data as provided by law. For each such entity, the agreement defines the list of personal data, the list of actions (operations) with personal data to be performed by the entity, the purposes of processing, the obligation to maintain confidentiality and ensure the security of personal data during processing, and the requirements for the protection of processed personal data in accordance with the law.

7.4. The Operator has the right to transfer personal data to investigative and law enforcement bodies, as well as other authorized bodies on the grounds provided for by the legislation of the Russian Federation.

## **8. Measures to Ensure the Confidentiality and Security of Personal Data during Processing**

8.1. The security of personal data processed by the Operator is ensured through the implementation of legal, organizational, technical, and software measures necessary and sufficient to meet the requirements of the legislation of the Russian Federation.

8.2. The Operator takes the following measures to ensure the security of personal data:

- appointing persons responsible for organizing the processing and ensuring the security of personal data;
- determining the list of employees who have access to personal data;
- developing and approving organizational and administrative documents defining the procedure for processing personal data;
- determining the level of personal data protection during processing in information systems of personal data;
- establishing rules for delimiting access to personal data processed in information systems and ensuring the registration and accounting of all actions performed with personal data;
- restricting access to premises where the main technical means and systems of personal data information systems are located;
- organizing backup and restoration of the operability of personal data information systems and personal data modified or destroyed due to unauthorized access;



- setting requirements for the complexity of passwords for accessing personal data information systems;
- performing antivirus control, preventing the introduction of malicious programs (viruses) and software bookmarks into the corporate network;
- organizing timely updates of software used in personal data information systems and information protection tools;
- conducting regular evaluations of the effectiveness of measures taken to ensure the security of personal data;
- detecting unauthorized access to personal data and taking measures to establish causes and eliminate possible consequences;
- controlling the measures taken to ensure the security of personal data and the level of protection of personal data information systems.

## **9. Rights and Obligations of Personal Data Subjects**

9.1. The User of the Website/Platform — the Subject — has the right to receive information related to the processing of their personal data, except in cases provided by federal laws, including:

- confirmation of the fact of processing personal data by the Operator;
- legal grounds and purposes for processing personal data;
- purposes and methods used by the Operator to process personal data;
- the name and location of the Operator, information about persons (except Operator's employees) who have access to personal data or to whom personal data may be disclosed under a contract with the Operator or by federal law;
- processed personal data relating to the relevant personal data subject, the source of their receipt, unless a different procedure for providing such data is established by federal law;
- terms of processing personal data, including terms of storage;
- the procedure for the personal data subject to exercise their rights provided by law;
- information on performed or intended cross-border transfer of personal data;
- name or surname, first name, patronymic, and address of the person processing personal data on behalf of the Operator if the processing is or will be entrusted to such person;
- other information provided by law or other federal laws.

9.2. The User has the right to demand that the Operator clarify, block, or destroy their personal data if such data are incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the declared purpose of processing, as well as to take legal measures to protect their rights.

9.3. The User has the right to request, in a structured, universal, and machine-readable format, a list of their personal data provided to the Operator for processing, and instruct the Operator to transfer their personal data to a third party if technically feasible. In this case, the Operator is not responsible for the actions of the third party performed with the personal data thereafter.

9.4. The User is obliged to provide the Operator with accurate information about themselves and notify of any clarification (update, change) of their personal data.

9.5. The Platform's functionality provided by the Operator is not intended for submitting requests containing personal data of third parties or the User themselves.

9.6. All questions regarding the processing of personal data should be addressed to: [hello@fusionbrain.ai](mailto:hello@fusionbrain.ai).

## **10. Final Provisions**

10.1. This Policy is a publicly available document and must be posted on the website at <https://fusionbrain.ai>.

10.2. The Operator has the right to amend this Policy unilaterally in the following cases:

- if the legislation of the Russian Federation regarding the processing and protection of personal data changes;
- if instructions are received to eliminate inconsistencies affecting the scope of the Policy;
- by the Operator's decision;
- if the purposes of processing personal data change;
- if the need arises to change the process of processing personal data related to the Operator's activities.

10.3. Compliance with the requirements of this Policy is monitored by the person responsible for organizing the processing of personal data.

10.4. Persons guilty of violating the regulations governing the processing and protection of personal data are liable as provided by the legislation of the Russian Federation.