

Personal Data Processing Policy on 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", address (location): 127015, Moscow, municipal district Savelovsky, Butyrskaya St., 77 (hereinafter referred to as the “Operator”) is an official document that defines the general principles, purposes, and procedure 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 in the field of personal data.

1.3. This Policy applies solely 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 force from the moment of its approval and remains valid indefinitely until it is replaced by a new Policy, which will be posted on the Website.

1.5. The current version of this Policy is located at: https://fusionbrain.ai/static/download/personal_en.pdf

2. Basic Terms and Definitions

2.1. The following terms are used in this Policy:

Processing of Personal Data – any action (operation) or a set of actions (operations) performed with or without the use of automation tools on personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, 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 actions resulting in the destruction of the physical media containing personal data.

Personal Data Operator (Operator) – a state or municipal authority, legal entity or individual who, independently or jointly with others, organizes and/or carries out the processing of personal data, as well as 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 within the scope of this Policy and when using the Website/Platform is LLC "Dalee Media", address (location): 127015, Moscow, municipal district Savelovsky, Butyrskaya St., 77.

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

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

User of the Website/Platform (User) – any person who visits the Website and uses the information, materials, and services of the Website/Platform.

Website – a set of interrelated web pages located 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 the User attempts to open a page of the corresponding website.

IP address – a unique network address of a node in a computer network through which the User accesses the Website.

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

PDIS (Personal Data Information System) – an information system of personal data.

Fusion Brain Platform/Platform – a software package that includes websites located in the fusionbrain.ai domain and its subdomains, mobile applications, and software (Program) located on these websites or in mobile applications.

3. Legal Grounds for Personal Data Processing

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

- Law;
- The Civil Code of the Russian Federation;
- The User Agreement (link: https://fusionbrain.ai/static/download/agreement_en.pdf) published on the Website and accepted by the Data Subject when using the Website and the Platform;
- The Agreement on Providing Access to the Functionality of the Platform and the Fusion Brain Software, published 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;
- Users' consents to the processing of their personal data.

4. Purposes of Processing, Categories and List of Processed Personal Data, Categories of Subjects, Methods, and Periods of Processing

4.1. The Operator determines the processes within which personal data is processed. For each 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 processed personal data: other personal data.
- List of processed personal data: email address; location information; type, version, language of operating system, browser; type of device and its screen resolution; pages opened by the user; IP address; User Hash-ID; web page view time; URL; HTTP referer; User Agent; HTTP Cookie.

- Actions performed by the Operator: collection, recording, systematization, accumulation, storage, clarification (update, change), retrieval, use, transfer (provision, access), blocking, deletion, destruction of personal data.
- Categories of data subjects: Users of the Website/Platform.
- Methods of data processing: automated.
- Period of processing and storage: until the achievement of the processing purposes or until consent is withdrawn. Terms of processing and storage: until the purposes of personal data processing are achieved or until consent is withdrawn.
- Personal data destruction procedure: specified in section 4.3 of the Policy.
- Transfer of personal data to the following persons:
 - PJSC "Sberbank" (TIN: 7707083893), Address: 117312, Moscow, Vavilova St., 19;
 - LLC "Cloud Technologies" (TIN: 7736279160), Address: 117312, Moscow, Vavilova St., 23, bld. 1, room N1.207.

4.2.2. Communication with Users (including sending informational messages, processing inquiries, materials of any nature, and responses):

- 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. Statistics and analysis of the Website/Platform operation, including improving and adapting the Platform to user needs:

- 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 campaigns, 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. Conducting marketing/advertising activities through monitoring audience behavior, data enrichment (including segmentation and scoring), and targeted advertising (personalized or non-personalized):

- 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 Platform plans:

- 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 the Destruction of Personal Data:

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

- Upon achievement of processing purposes or expiration of storage periods — within 30 days;
- Upon loss of necessity to achieve processing purposes — within 30 days;
- Upon submission by the Data Subject or their legal representative of evidence that the data was unlawfully obtained or unnecessary — within 7 days;
- If lawful processing cannot be ensured — within 10 days;
- Upon withdrawal of consent by the Data Subject — within 30 days;
- Upon expiration of limitation periods related to legal relationships involving data processing.

4.3.2. Pursuant to Part 5 Article 21 of the Law, the Operator does not cease processing or destroy data if:

- Otherwise provided by a contract to which the Data Subject is a party, beneficiary, or guarantor;
- The Operator has the right to process data without the Data Subject's consent under Russian law;
- Processing periods set by Russian law have not expired.

4.3.3. Automated data destruction is conducted by a commission formed by the Operator's order. Data is destroyed via OS or database management system tools. Confirmation documents: destruction act and event log dump.

4.3.4. The destruction act and the log dump are stored for 3 years after the data destruction date.

5. Procedure for the Use of Cookies

5.1. To maintain statistics and analyze the operation of the Website/Platform, the Operator processes data about the Website User using cookies, provided that this is allowed in the User's browser settings (cookie storage is enabled).

5.2. The procedure for processing cookies is set out in the Cookie Policy available at the following link: 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 for the processing of their personal data, 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 independently via special forms located on the Website/Platform or sent to the Operator via 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 for the transfer of such data to the Operator for subsequent processing.
- 6.2.2. The personal data subject independently decides to provide their personal data and gives consent freely, by their own will, and in their own interest.
- 6.3. The Operator carries out automated processing of personal data.
- 6.4. Only those employees of the Operator whose job responsibilities include the processing of personal data are permitted to process personal 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. The storage and placement of documents containing personal data in open electronic directories (file-sharing services) in ISPD is not allowed.
- 6.7. Personal data is stored in a form that allows determining the personal data subject no longer than required by the purposes of personal data processing.
- 6.8. The processing of biometric personal data and special categories of personal data related to race, nationality, political opinions, religious or philosophical beliefs, health, or sex life is not carried out on the Website/Platform.
- 6.9. The Operator does not process personal data for the purpose of political campaigning.
- 6.10. When processing personal data obtained through the Website/Platform, the Operator uses databases located on 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. If inaccurate personal data or unlawful processing is identified, personal data will be clarified and blocked in the manner and under the conditions established by the legislation of the Russian Federation.
- 6.13. The period for processing personal data 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 a notification to the Operator via email with the note "Withdrawal of consent to the processing of personal data."

7. Transfer of Personal Data to Third Parties

7.1. In order to achieve the purposes of personal data processing stated in Section 4 of the Policy, the Data Subject authorizes, 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, Municipal District Akademichesky, Vavilova St., 19, Floor 3, Room B.03.016;
- LLC "YANDEX" (TIN: 7736207543), Address: 119021, Moscow, Lev Tolstoy St., 16;
- LLC NCO "YooMoney," Address: 115035, Moscow, Sadovnicheskaya St., 82, Bldg. 2.

7.2. The transfer of personal data to the above entities is carried out based on the terms of the agreement (offer), consent to the processing of personal data of the data subjects, and a processing agreement concluded between the Operator and the parties processing personal data.

7.3. Parties processing personal data under such agreements are obliged to comply with the principles and rules for the processing and protection of personal data as established by law. Each such agreement specifies the list of personal data, the list of actions (operations) with personal data to be performed by the processing party, the purposes of processing, confidentiality obligations, data security measures during processing, and protection requirements in accordance with the law.

7.4. The Operator is entitled to transfer personal data to investigative and law enforcement authorities and other authorized bodies on the grounds provided for by the applicable 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 by implementing 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:

- appointment of persons responsible for organizing the processing and ensuring the security of personal data;
- defining the list of employees who have access to personal data;
- development and approval of organizational and administrative documents determining the procedure for processing personal data;
- determining the level of personal data protection when processed in personal data information systems;
- establishing rules for access control 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 recovery of personal data information systems and data modified or destroyed due to unauthorized access;
- establishing password complexity requirements for access to personal data information systems;

- implementing antivirus control, preventing the introduction of malicious software (viruses) and software bookmarks into the corporate network;
- ensuring timely updating of software used in personal data information systems and information protection tools;
- conducting regular assessments of the effectiveness of measures taken to ensure personal data security;
- detecting incidents of unauthorized access to personal data and taking measures to determine causes and eliminate possible consequences;
- controlling the measures taken to ensure the security of personal data and the levels of protection of personal data information systems.

9. Rights and Obligations of Personal Data Subjects

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

- confirmation of the processing of personal data by the Operator;
- legal grounds and purposes of personal data processing;
- purposes and methods of processing personal data used by the Operator;
- name and location of the Operator, information about persons (excluding the Operator's employees) who have access to personal data or to whom personal data may be disclosed under an agreement with the Operator or under federal law;
- processed personal data relating to the relevant data subject, the source of their receipt, unless otherwise provided by federal law;
- personal data processing periods, including storage periods;
- the procedure for exercising the rights of the personal data subject under the law;
- information on actual or intended cross-border data transfers;
- name or surname, first name, patronymic, and address of the person processing personal data on behalf of the Operator, if processing is or will be entrusted to such a person;
- other information as provided by law or other federal laws.

9.2. The User has the right to demand that the Operator clarify their personal data, block or destroy it if the data is incomplete, outdated, inaccurate, unlawfully obtained, or not necessary for the stated 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, subject to technical feasibility. In this case, the Operator is not responsible for the actions of the third party regarding the personal data.

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

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

9.6. All questions regarding the processing of personal data should be sent to: hello@fusionbrain.ai.

10. Final Provisions

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

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

- changes in the legislation of the Russian Federation regarding the processing and protection of personal data;
- receipt of orders to eliminate inconsistencies affecting the scope of this Policy;
- by decision of the Operator;
- changes in the purposes of personal data processing;
- the need to change the process of personal data processing related to the Operator's activities.

10.3. Control over compliance with this Policy is exercised by the person responsible for organizing the processing of personal data.

10.4. Persons guilty of violating the rules governing the processing and protection of personal data bear responsibility in accordance with the legislation of the Russian Federation.