

Privacy Policy

Personal Data Processing Policy

1. General

This Personal Data Processing Policy is developed in compliance with the requirements of Federal Law on Personal Data No. 152-FZ dated 27.07.2006 and determines the procedure for personal data processing and the measures to ensure the security of personal data to be taken by Asoniya LLC (hereinafter, the Operator).

1.1. Processing of all personal data with due diligence to ensure protection of human rights and freedoms, including the right to personal and family privacy, is one of obligations and top priorities of the Operator.

1.2. This Personal Data Processing Policy (hereinafter, the Policy) shall be applicable to all information provided by the visitors of [http:// asoniya.org](http://asoniya.org).

2. Terms and Definitions

2.1. Automated Personal Data Processing: processing of personal data with the help of computer equipment.

2.2. Personal Data Blocking: temporary suspension of personal data processing (unless such processing is required for personal data updates).

2.3. Website: graphic and informative content, as well computer software and databases ensuring accessibility of such content at [http:// asoniya.org](http://asoniya.org).

2.4. Personal Data Information System: a set of personal data included into personal data databases, as well as the software and tools used for their processing.

2.5. Personal Data Depersonalisation: actions that render correlation of personal data to a specific User or another personal data subject impossible without obtaining additional information.

2.6. Personal Data Processing: any action or a set of actions performed in relation to personal data with or without using automation tools, including collection, recording, systematisation, accumulation, amendment (updating, modification), extraction, use, transmission (distribution, dissemination, provision of access), depersonalisation, blocking, deletion, and destruction of personal data.

2.7. Operator: a government authority, municipal authority, legal entity or individual, that arrange and/or perform processing of personal data, independently or together with other persons, and define the purposes of such personal data processing, the content of the personal data to be processed, and actions to be performed with the personal data.

2.8. Personal Data: any information related, directly or indirectly, to a specific or identifiable User of [http:// asoniya.org](http://asoniya.org).

2.9. User: any visitor of [http:// asoniya.org](http://asoniya.org).

2.10. Personal Data Provision: disclosure of personal data to a particular person or a certain group of persons.

2.11. Personal Data Distribution: disclosure of personal data to an indefinite group of persons (transfer of personal data) or making such data available to an unlimited group of persons, including publication of personal data in mass media, information and telecommunications networks, or otherwise.

2.12. Cross-Border Personal Data Transmission: transmission of personal data to the territory of a foreign country, to a foreign authority, to a foreign legal entity or a foreign individual.

2.13. Personal Data Destruction: destruction of personal data that renders its recovery in the personal data information system impossible and/or resulting in the destruction of the physical media where the personal data was stored.

3. The Operator shall have the right to process the following personal data of the User:

3.1. Full name

3.2. Email

3.3. Phone numbers

3.4. Delivery address

3.5. The Operator shall also have the right to collect and process depersonalised data on the website visitors, including cookie files, using services of web analytics (Yandex.Metrics, Google Analytics, etc.).

3.6. All types of data above are hereinafter referred to as Personal Data.

4. Purpose of Personal Data Processing

4.1. The Operator process personal data to inform the User by email, as well as for conclusion, execution, and termination of civil contracts.

4.2. The Operator shall also have the right to notify the User on new products and services, promotional offers, and events. The User shall have the right to unsubscribe by sending an email marked “Unsubscribing from information on new products and services and promotional offers” to info@asoniya.org.

4.3. Depersonalised data collected using web analytics services are used to monitor user activity, improve website quality and its contents.

5. Legitimacy of Personal Data Processing

5.1. The Operator shall process personal data only if the User provides such data by filling out and submitting dedicated forms at <http://asoniya.org>. By filling out such forms and/or submitting his/her personal data to the Operator, the User gives his/her consent with this Policy.

5.2. The Operator can process depersonalised data only if it is permitted in the settings of the User’s browser (cookies and JavaScript are enabled).

6. Collection, Storage, and Other Types of Personal Data Processing

The Operator shall use legal, organisational, and technical means to ensure security of the processed personal data in full accordance with the applicable laws on personal data protection.

6.1. The Operator shall ensure security of personal data and undertake all measures required to prevent unauthorised access to such data.

6.2. Under no circumstances can personal data be transferred to any third parties, except as required by the applicable legislation.

6.3. In case of inaccuracies in the personal data, the User can update such data by notifying the Operator by sending an email marked “Personal data update” to info@asoniya.org.

6.4. The consent to personal data processing is given for an indefinite period. The User shall have the right to revoke his/her consent to personal data processing by sending an email marked “Personal data processing consent withdrawal” at info@asoniya.org.

7. Cross-Border Personal Data Transmission

7.1. Before transmitting personal data across the border, the Operator shall make sure that the receiving state provides adequate protection of the rights of personal data subjects.

7.2. Cross-border personal data transmission to foreign states that do not meet the above requirements can be effected only in case of the User’s prior written consent to cross-border personal data transmission and/or execution of an agreement to which the data subject is a party.

8. Miscellaneous

8.1. The User shall have the right to get any clarifications with respect to processing of his/her personal data by sending an inquiry to info@asoniya.org.

8.2. This document will include all amendments and updates to this Personal Data Processing Policy. This Policy shall remain in effect for an indefinite period until it is replaced with a new revision.