

## **PERSONAL DATA PRIVACY POLICY**

This Personal Data Privacy Policy (hereinafter referred to as the Privacy Policy, Policy) is developed in accordance with requirements set forth in the Federal Law of the Russian Federation dated 27 July 2006 No. 152-ФЗ (152-FZ) "On Personal Data", as well as in the Regulation (EU) 2016/679 of the European Parliament and of the Council dated 27 April 2016 No. 2016/679 "On the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, GDPR)". The Policy specifies the procedure for Processing of Personal Data received by the Operator from Users when they use Websites, and measures to ensure the security of Personal Data taken by the Operator to protect human and civil rights and freedoms while using Personal Data.

### **1. Definition of Terms**

1.1. This Privacy Policy includes the following terms:

1.1.1 "Operator" means Sberbank (OGRN 1027700132195. Registered office address: 19, Vavilova Street, Moscow, Russia, 117997), a legal entity, independently or jointly with others, organizing and/or carrying out the Processing of Personal Data, as well as determining the purposes of Personal Data Processing, the composition of Personal Data to be Processed, actions (operations) to be performed with Personal Data;

1.1.2 "Event" means the Artificial Intelligence International Junior Contest 2021 organized by the Operator and AI Alliance Russia (OGRN 1207700257643. Registered office address: 18, Andropova Prospekt, Bld. 9, Room 21, Moscow, Russia, 115432);

1.1.3. "Personal Data" means any information related to a directly or indirectly identified or identifiable individual (personal data subject);

1.1.4. "Personal Data Processing" means any action (operation) or a combination of actions (operations) performed with Personal Data with the use of automation tools or without them, including collection, recording, systematization, accumulation, storage, refinement (updating, modification), extraction, use, transfer (dissemination, provision, access), anonymization, blocking, deletion, destruction of Personal Data;

1.1.5. "Personal Data Privacy" means a requirement to prevent Personal Data disclosure or dissemination without User's consent or other legitimate grounds, which is binding upon the Operator, User or other person having access to such data;

1.1.6. "Websites" means a combination of interrelated web pages on the Internet, with the following unique addresses (URLs): AIJC.RU, AIJC.COM;

1.1.7. "User" means a person registered at the Websites and/or having details for access to the Websites (login and password). For purposes of this document, User shall also mean a legal representative of such person, as well as a person visiting the Websites, if his/her Personal Data are processed.

1.1.8. "Cookies" means small data fragments requested by the website from the browser used on User's computer or mobile device. Cookies allow the website to 'remember' User's actions or preferences. Cookies are stored locally on your computer or mobile device. Users can delete saved cookies at their own discretion;

1.1.9. "IP address" is a unique network address of the computer network node, through which the User gains access to the Websites.

Any other terms and definitions used in this Privacy Policy and not mentioned in this section shall be interpreted in a consistent manner, in relation to other terms, individual terms and conditions, as well as in accordance with the meaning implied in the Policy text. If it is impossible to define a term or concept based on the Policy text, such term or concept shall be defined in accordance with applicable laws in force or based on law enforcement practice.

### **2. General Provisions**

2.1. Use of the Websites by the User shall mean the consent with this Privacy Policy and Personal Data Processing terms and conditions specified therein.

2.2. In case of disagreement with terms and conditions of the Privacy Policy, the User must stop using the Websites.

2.3. This Privacy Policy shall be applied only to Personal Data received by the Operator with the use of Websites mentioned in Section 3. The Operator shall not control and shall not be responsible for third-party websites (and their content), where the User may go using links available on the Websites.

2.4. The Operator shall not verify and shall not guarantee the validity of Personal Data provided by the Users.

### **3. Processed Personal Data**

3.1. The list of processed Personal Data may contain the following categories:

3.2.1 Basic User information: for the User being the Event participant - in particular, login; email address; country, region of residence; full name; sex; date of birth; team name (if any); school name; class; city of residence; mobile phone number; social network contacts; birth certificate information (date of issue, number), copy of the User's ID, and - in case if the User wins at the Event - information on individual's registration with a tax authority at the place of residence (if any), bank details; for legal representatives – in particular, full name, email address, phone number, copy of ID, information on a document confirming the authority as a legal representative (type, date of issue, number);

3.2.2 Information on actions taken by the User on the Websites, on devices used by the User (including IP address), other information indicated in Clause 3.3.

3.3. Use of cookies:

3.3.1. Cookies, information on the User's actions on the Websites, information on the User's equipment, session date and time shall be processed with a view to ensure the correct work of the Websites, convenience of their use by the User, information on actions of the Website Users shall also be processed to determine the Users' preferences while working with the Websites and subsequent improvement of the Website features.

3.3.2. The User can disable cookies, but in this case the User may find that some sections of the Websites do not work in a proper manner.

Instructions on cookie management in the browser may usually be found in the reference service (Help function) or in the browser settings.

### **4. Purposes, grounds, procedures of Personal Data Processing**

4.1. User's Personal Data mentioned in Section 3 may be processed for the following purposes:

4.1.1. To identify the User, to create an account on the Websites for him/her and to grant access to the Website content and features in order to ensure the User's participation in the Event (including sending of information messages related to participation in the Event (for example, on place and time of its individual stages, published competitive tasks, other similar information), to provide the Event prize, if the User wins at the Event, to provide services related to the Event (in particular, to arrange and pay for flights, accommodation and meals, if the User takes part in the live final stage of the Event held in Moscow, to create and print badges, to issue an entry pass, to book a location for the live final stage of the Event, to take other similar actions needed to hold the Event in a proper manner), as well as to grant the User access to the location where the live final stage of the Event is held);

4.1.2. To send the User newsletters about events similar to the Event held by the Operator.

4.2. The User's Personal Data shall be processed, without limitation, if the User's legal representative gives his/her consent to Personal Data Processing for one or more of the above-mentioned purposes.

4.3. Personal Data may be processed both with the use of automation tools (automated Processing) and without them (non-automated Processing) and may include the following actions: collection, recording, systematization, accumulation, storage, refinement (updating, modification), extraction, use, transfer (dissemination, provision, access), anonymization, blocking, deletion, destruction of Personal Data, as well as granting access to such data to third persons providing technical support to the Websites and their features.

## **5. Time limits for Personal Data Processing**

5.1. The User's Personal Data mentioned in Section 3 shall be processed for as long as needed to achieve purposes mentioned in Section 4 or to comply with requirements set forth in applicable laws.

5.2. In cases when such Processing is based on the consent given by the User for the respective Processing purpose, Personal Data shall be processed until the User withdraws his/her consent or until expiration of such consent.

5.3. The User's personal data may be processed after deletion of the User's account on the Websites in cases provided for in applicable laws.

## **6. Rights and obligations of the User and the Operator**

### **6.1. The User may:**

6.1.1. Give his/her free consent to Personal Data Processing, willingly and for his/her own benefit, while registering at the Websites, and to withdraw such consent at any time by sending a respective writing request in any format to addresses given in Clause 9.1.

6.1.2. Request the confirmation of Personal Data Processing. In case of such Processing, the User shall have the right to get acquainted with processed Personal Data and with information on Processing purposes, categories of processed data, actions with data, data receivers and guarantees given while transferring data to third persons, time limits for Processing, sources of data, exclusively automated decision-making process, inclusion of the User in the Operator's mailing lists. The User shall also have the right to receive a list of Personal Data processed by the Operator.

6.1.3. Require to correct the Personal Data if there are any mistakes found in the composition of Personal Data processed by the Operator. Taking into account the Processing purposes, the User shall have the right to make additions to the Personal Data, including by providing an additional application.

6.1.4. Initiate the limitation of Personal Data Processing, if one of the following terms and conditions is applied:

- accuracy of Personal Data is disputed by the User (limitation for a period needed for the Operator to confirm the correctness of Personal Data);
- unauthorized Personal Data Processing is detected, but the User is opposed to deletion of the Personal Data and requires to limit its use instead;
- the Operator does not need the Personal Data anymore for the processing purposes, but they are needed for the User for substantiation, execution or defense of claims;
- the User is opposed to Personal Data Processing (limitation for a period needed for the Operator to find out whether the Operator's legitimate grounds for Personal Data Processing prevail over the User's legitimate grounds).

6.1.5. Require to delete his/her Personal Data from the Websites or other existing physical sources, if one of the following terms and conditions is applied:

- Personal Data are not needed anymore for purposes, for which they have been received;

- the User withdraws his/her consent to Processing, if there is no other legal ground for Processing;
- Personal Data are being processed illegally;
- Personal Data must be destroyed with a view to discharge a legal obligation placed upon the Operator by applicable laws;
- Personal Data have been received as part of providing information society services.

6.1.6. The User shall have the right to request a structured, universal and machine-readable list of Personal Data made available to the Operator, and to entrust the Operator with transferring the Personal Data to a third person, to the extent technically feasible for the Operator. In this case, the Operator shall not be responsible for actions of the third party taken with regard to the Personal Data later on.

6.1.7. The User shall have the right to object to Processing of a part or a full list of Personal Data for purposes mentioned when making the Personal Data available to the Operator, unless legitimate grounds for Processing prevail over the User's interests, rights and freedoms or Processing is needed for substantiation, execution or defense of claims.

6.1.8. The User shall have the right to file a complaint to a supervisory authority, if the Operator infringes his/her rights while processing Personal Data.

#### **6.2. The User shall be obliged:**

6.2.1. To take measures needed to ensure the privacy of credentials (login and password) used to access the User's personal area, and ensure that the password is not saved in the browser, in case of possible use of the User's device by other persons;

6.2.2. Not to publish materials, where other persons are captured, or Personal Data of such persons without proper legitimate grounds, unless such grounds are not needed in accordance with applicable laws.

#### **6.3. The Operator shall be obliged:**

6.3.1. To use the received Personal Data of Users exclusively for purposes mentioned in Section 4 of this Privacy Policy.

6.3.2. To ensure that the Personal Data of Users are kept confidential, not to disclose them without the User's consent, and not to sell, exchange, publish, or otherwise disclose the User's Personal Data, unless they are made available to authorized executive government agencies and only on the grounds and in the manner provided in applicable laws.

6.3.3. To process the User's Personal Data, and to ensure the Privacy and protection of processed Personal Data in accordance with requirements set forth in the Federal Law of the Russian Federation dated 27 July 2006 No. 152-ФЗ (152-FZ) "On Personal Data", as well as GDPR. To take necessary legal, organizational and technical measures, while processing the Personal Data, aimed at protecting the Personal Data received from the User from unauthorized or accidental access, destruction, modification, blocking, copying, provision, dissemination, as well as from other illegal actions with regard to the Personal Data received from the User.

### **7. Additional Terms and Conditions**

8.1. The operator shall have the right to amend this Privacy Policy.

8.2. The Privacy Policy shall come into effect on the date when it is published on the Website, unless otherwise provided by the new version of the Privacy Policy.

### **8. Contact details**

9.1. In case of any questions, proposals, or an intent to exercise one or more User's rights with regard to Personal Data Processing, the User may contact the Operator using the following contact details:

**Sberbank**

Address: 19, Vavilova Street, Moscow, Russia, 117997, email: [sberbank@sberbank.ru](mailto:sberbank@sberbank.ru)