

# Personal Data Processing Policy

## 1. General Provisions

This personal data processing policy has been drawn up in accordance with the requirements of the Federal Law dated July 27, 2006 No. 152-FZ «On Personal Data» and determines the procedure for processing personal data and measures to ensure the security of personal data of Crypto Citadel (hereinafter referred to as the Operator).

- The operator sets as its most important goal and condition for the implementation of its activities the observance of the rights and freedoms of a person and a citizen in the processing of his personal data, including the protection of the rights to privacy, as well as personal and family secrets.
- This Operator's policy regarding the personal data processing (hereinafter referred to as the Policy) applies to all information that the Operator can receive about visitors to the <https://crypto-citadel.org> website

## 2. Basic Concepts Used in the Policy

- Automated personal data processing is the personal data processing using computer technology;
- Blocking of personal data is a temporary suspension of the personal data processing (unless the processing is necessary to clarify personal data);
- Website is a collection of graphic and informational materials, as well as computer programs and databases that ensure their availability on the Internet at the <https://crypto-citadel.org> network address;
- Personal data information system is a set of personal data contained in databases and information technologies and technical means that ensure their processing;
- Depersonalization of personal data - these are actions as a result of which it is impossible to determine, without the use of additional information, the ownership of personal data by a specific User or other subject of personal data;
- Processing of personal data is any action (operation) or a set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;
- Operator is a state body, municipal body, legal or natural person, independently or jointly with other persons organizing and (or) carrying out the personal data processing, as well as determining the purposes of the personal data processing, the composition of personal data to be processed, actions (operations) committed with personal data;
- Personal data is any information relating directly or indirectly to a particular or identifiable user of the <https://crypto-citadel.org> website;
- User is any visitor to the <https://crypto-citadel.org> website;
- Provision of personal data are actions aimed at disclosing personal data to a certain person or a certain circle of persons;

- Dissemination of personal data is any action aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or familiarizing with personal data of an unlimited number of persons, including the disclosure of personal data in the media, their placement in information and telecommunication networks or providing access to personal data in any other way;
- Cross-border transfer of personal data is the transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity;
- Destruction of personal data is any action as a result of which personal data is irretrievably destroyed with the impossibility of further restoration of the content of personal data in the information system of personal data and (or) as a result of which material carriers of personal data are destroyed.

### **3. The Operator May Process the Following User's Personal Data**

- Full Name;
- E-mail address;
- Phone numbers;
- Date and place of birth;
- The website also collects and processes anonymous data about visitors (including cookies) using Internet statistics services (Yandex Metrica, Google Analytics and others).
- The above data further in the text of this Policy are united by the general concept of Personal data.

### **4. Purposes of Personal Data Processing**

- The purpose of the User's personal data processing is to provide the User with access to the services, information and/or materials contained on the website.
- The Operator also has the right to send notifications to the User about new products and services, special offers and various events. The User can always opt out of receiving informational messages by sending an email to the Operator at [support@crypto-citadel.org](mailto:support@crypto-citadel.org) with the note "Opt out of notifications about new products, services and special offers."
- Depersonalized data of Users, collected with the help of Internet statistics services, serve to collect information about the actions of Users on the website, improve the quality of the website and its content.

### **5. Legal Grounds for the Personal Data Processing**

- The Operator processes the User's personal data only if they are filled in and/or sent by the User independently through special forms located on the <https://crypto-citadel.org> website. When the User fills out the relevant forms and / or sends his personal data to the Operator, he expresses his consent to this Policy.
- The Operator processes depersonalized data about the User, if it's allowed in the User's browser settings (saving cookies and using JavaScript technology is enabled).

### **6. Procedure for Collecting, Storing, Transferring and Other Types of Personal Data Processing**

- The security of personal data processed by the Operator is ensured through the implementation of

legal, organizational and technical measures necessary to fully comply with the requirements of the current legislation in the field of personal data protection.

- The operator ensures the safety of personal data and takes all possible measures to prevent access of unauthorized persons to personal data.
- The User's personal data will never and under no circumstances be transferred to third parties, except in cases related to the implementation of applicable law.
- If inaccuracies have been identified in personal data, the User can update them independently by sending a notification to the Operator at the Operator's e-mail address [support@crypto-citadel.org](mailto:support@crypto-citadel.org) marked «Updating personal data».
- The term of personal data processing is unlimited. The User may at any time withdraw his consent to the personal data processing by sending the Operator a notification by e-mail to the Operator's e-mail address [support@crypto-citadel.org](mailto:support@crypto-citadel.org) marked «Withdrawal of consent to the personal data processing».

## **7. Cross-Border Transfer of Personal Data**

- Prior to the start of the cross-border transfer of personal data, the Operator is obliged to make sure that the foreign state, to whose territory it is planned to transfer personal data, provides reliable protection of the rights of personal data subjects.
- Cross-border transfer of personal data on the territory of foreign states that don't meet the above requirements can be carried out only if there is a written consent of the personal data subject to the cross-border transfer of his personal data and/or execution of an agreement to which the personal data subject is a party.

## **8. Final Provisions**

- The User can receive any clarifications on his questions regarding the processing of his personal data by contacting the Operator via e-mail [support@crypto-citadel.org](mailto:support@crypto-citadel.org)
- This document will reflect any changes in the personal data processing policy by the Operator. The policy is valid indefinitely until it's replaced by a new version.