

## Privacy Policy

### 1. General provisions

This policy of personal data processing is drawn up in accordance with the requirements of the Federal Law dated 27.07.2006. No152-FL "On Personal Data" and defines the order of personal data processing and measures to ensure personal data security taken by Studia-54 LLC (hereinafter referred to as the Operator).

1.1. The Operator sets as its most important goal and condition of its activity the observance of human and civil rights and freedoms during the processing of personal data, including the protection of the rights to privacy, personal and family secrecy.

1.2. This Operator's policy regarding the processing of personal data (hereinafter - the Policy) applies to all information that the Operator can obtain about the visitors of the website <https://www.studia-54.com>.

### 2. Basic concepts of the Policy

2.1. Automated processing of personal data - processing of personal data by means of computer equipment;

2.2. Blocking of personal data - temporary cessation of personal data processing (except for cases when processing is necessary to clarify personal data);

2.3. Website - a set of graphic and informational materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address <https://www.studia-54.com>;

2.4. Personal data information system - a set of personal data contained in databases and information technologies and technical means ensuring their processing;

2.5. Personal data depersonalization - actions, as a result of which it is impossible to determine without using additional information whether personal data belong to a particular User or other subject of personal data;

2.6. Processing of personal data - any action (operation) or set of actions (operations) performed with or without the use of automation means with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;

2.7. Operator - a state authority, municipal authority, legal entity or individual, independently or jointly with other individuals organizing and (or) carrying out processing of personal data, as well as determining the purposes of personal data processing, composition of personal data subject to processing, actions (operations) performed with personal data;

2.8. Personal data - any information relating directly or indirectly to a certain or defined User of <https://www.studia-54.com> website.

2.9. User - any visitor of the website <https://www.studia-54.com>;

2.10. Provision of personal data - actions aimed at disclosure of personal data to a certain person or a certain circle of individuals;

2.11. Disclosure of personal data - any actions aimed at disclosure of personal data to an indefinite number of persons (transfer of personal data) or familiarization of personal data to an unlimited number of individuals, including disclosure of personal data in mass media, placement in information and telecommunication networks or providing access to personal data in any other way;

2.12. Trans-border transfer of personal data - transfer of personal data to the territory of a foreign country to a foreign government authority, foreign individual or foreign legal entity;

2.13. Destruction of personal data - any actions, as a result of which personal data are irretrievably destroyed with the impossibility of further recovery of the content of personal data in the information system of personal data and (or) material carriers of personal data are destroyed.

3. The Operator may process the following personal data of the User

3.1. Surname, first name, middle name;

3.2. E-mail address;

3.3. Telephone numbers;

3.4. The site also collects and processes anonymized data about visitors (including cookies) using Internet statistics services (Yandex Metrica and Google Analytics and others).

3.5. The above mentioned data are hereinafter in the text of the Policy united by the general term Personal Data.

4. Purposes of personal data processing

4.1. The purpose of processing the User's personal data is informing the User by sending e-mails; providing the User with access to services, information and (or) materials, contained on the website.

4.2. The Operator also has the right to send the User notifications about new products and services, special offers and various events. The User can always refuse to receive informational messages by sending the Operator a letter to the e-mail address [partners@studia-54.com](mailto:partners@studia-54.com) with the note "Refusal of notifications about new products and services and special offers".

4.3. The anonymized data of Users collected through Internet statistics services are used to collect information about Users' actions on the website, to improve the quality of the website and its content.

5. Legal basis for processing personal data

5.1. The Operator processes the User's personal data only if it is filled in and (or) sent by the User himself/herself through special forms located on the website <https://www.studia-54.com>. By filling in the relevant forms and/or sending his/her personal data to the Operator, the User expresses his/her consent to this Policy.

5.2. The Operator processes anonymized data about the User if it is allowed in the User's browser settings (cookies and JavaScript technology enabled).

6. Procedure for collection, storage, transfer and other types of personal data processing

Security of personal data processed by the Operator is ensured by implementing legal, organizational and technical measures necessary for full compliance with the requirements of the applicable legislation in the field of personal data protection.

6.1. The Operator shall ensure safety of personal data and take all possible measures to exclude access to personal data by unauthorized individuals.

6.2. The User's personal data will never, under no circumstances, be transferred to third parties, except for cases related to the execution of the current legislation.

6.3. In case of identification of inaccuracies in personal data, the User may update them independently, by sending a notice to the Operator to the Operator's e-mail address [partners@studia-54.com](mailto:partners@studia-54.com) with the informing User by sending e-mails; providing access to services, information and/or materials contained on the website, contained on the website by marking "Updating of personal data".

6.4. The period of personal data processing is unlimited. The User may withdraw his/her consent to the processing of personal data at any time by sending a notice to the Operator by e-mail to the Operator's e-mail address [partners@studia-54.com](mailto:partners@studia-54.com) marked "Withdrawal of consent to the processing of personal data".

## 7. Trans-border transfer of personal data

7.1 Before commencing the trans-border transfer of personal data, the Operator is obliged to ensure that the foreign state, to the territory of which the transfer of personal data is supposed to be carried out, provides reliable protection of the rights of personal data subjects.

7.2. Trans-border transfer of personal data to the territory of foreign states that do not meet the above requirements may be carried out only in case of written consent of the personal data subject to trans-border transfer of his/her personal data and (or) fulfillment of the agreement to which the personal data subject is a party.

## 8. Final provisions

8.1. The User may obtain any clarifications on the issues of interest regarding the processing of his/her personal data by contacting the Operator via e-mail at [partners@studia-54.com](mailto:partners@studia-54.com).

8.2. This document will reflect any changes to the Operator's personal data processing policy. The Policy is valid indefinitely until it is replaced by a new version.

8.3. The current version of the Policy is available on the Internet at <https://www.studia-54.com/en/privacy/>.