Personal data processing policy

1. General Provisions

This personal data processing policy has been drawn up under the requirements of the Federal Act № 152 of July 27, 2006 "On personal data" and determines the procedure for processing personal data and measures to ensure the security of personal data SP Medvedev Dmitry Alexandrovich (hereinafter referred to as the Operator).

- 1. The operator sets as his most important goal and condition for the implementation of his activities the observance of human and civil rights and freedoms when processing their personal data, including the protection of the rights to privacy and family.
- 2. This Operator's policy applies to all information that the Operator can obtain about visitors of the atma.company website, regarding the processing of personal data (hereinafter referred to as the Policy).

2. Basic concepts used in the Policy

- 1. Automated personal data processing processing of personal data using means of computer technology;
- 2. Blocking of personal data temporary termination of the processing of personal data (except in cases where processing is necessary to clarify personal data);
- 3. Website a set of graphic and information materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address atma.company or atmapro.ru;
- 4. Information system of personal data a set of personal data contained in databases, and ensuring their processing of information technologies and technical means;
- 5. Anonymization of personal data actions as a result of which it is impossible to determine without the use of additional information the ownership of personal data to a specific User or other subjects of personal data;

- 6. Processing of personal data 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 (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;
- 7. Operator a state body, a municipal body, a legal entity, or an individual, independently or jointly with other persons organizing and (or) processing personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) committed with personal data;
- 8. Personal data —any information relating directly or indirectly to a specific or identifiable User of the website atma.company or atmapro.ru;
- 9. User any visitor to the website atma.company or atmapro.ru;
- 10. Provision of personal data actions aimed at disclosing personal data to a certain person or a certain circle of persons;
- 11. Dissemination of personal data any actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or at acquaintance with the personal data of an unlimited number of persons, including the disclosure of personal data in the media, posting in information and telecommunication networks or providing access to personal data in any other way;
- 12. Cross-border transfer of personal data transfer of personal data to the territory of a foreign state to the authority of a foreign state, to a foreign individual or foreign legal entity;
- 13. Destruction of personal data any actions as a result of which personal data are destroyed irrevocably with the impossibility of further restoring the content of personal data in the personal data information system and (or) as a result of which material carriers of personal data are destroyed.
- 3. The operator can process the following personal data of the User
- 1. Surname, Name, or Patronymic
- 2. E-mail
- 3. Phone number

4. The operator uses the following forms of processing User data

- 1. Feedback form
- 2. Web-analytics counter (for example, Yandex.Metrica)
- 3. Online consultant widget, where it is possible to leave your contacts

5. The operator provides the following types of services

Access to information about the Product and/or service or information about purchasing the Product on a paid/free basis

6. The operator has the following rights

The Operator 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 email address post@atmapro.ru marked "Waiver of notice about new products and services and special offers."

7. Legal basis for the processing of personal data

- 1. The Operator processes the User's data only if it is filled in and/or sent by the User independently through special forms located on the website atma.company or atmapro.ru. By filling out the corresponding forms and/or sending his personal data to the Operator, the User agrees with this Policy.
- 2. The Operator processes anonymized data about the User if it is allowed in the settings of the User's browser (the storage of cookies and the use of JavaScript technology are enabled).

8. Purposes for which the information provided on the site can be used

- 1. For personal non-commercial purposes
- 2. For commercial purposes with the permission of the copyright holders

9. Purpose of data processing

1. Targeting advertising materials

2. Communication with the user, including sending notifications, requests, and information regarding the use of the site, the provision of services, processing requests and applications from the user

10. The procedure for collecting, storing, transferring, and other types of processing of personal data

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.

- 1. The operator ensures the safety of personal data and takes all possible measures to exclude access to the personal data of unauthorized persons.
- 2. The personal data of the User will never, under any circumstances, be transferred to any third parties, except in cases related to the implementation of the current legislation.
- 3. In case of revealing inaccuracies in personal data, the User can update them independently by sending a notification to the Operator to the Operator's e-mail address post@atmapro.ru marked "Updating personal data".
- 4. The term for processing personal data is unlimited. The user can at any time revoke his consent to the processing of personal data by sending a notification to the Operator via e-mail to the Operator's email address post@atmapro.ru with the note "Revocation of consent to the processing of personal data".

11. Final provisions

- 1. The user can receive any clarifications on issues of interest regarding the processing of his personal data by contacting the Operator via e-mail post@atmapro.ru.
- 2. This document will reflect any changes in the personal data processing policy by the Operator. The policy is valid indefinitely until it is replaced by a new version.
- 3. The current version of the Policy is freely available on the Internet at atma.company/policy_personal_data_ru.pdf