



Limited Liability Company "CDN-Video"  
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of federal significance, municipal district Tagansky,  
Solyanka str., 13/3, building 1  
Phone/fax: (495) 782 17 32  
E-mail: [info@cdnvideo.com](mailto:info@cdnvideo.com)  
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**Approved  
by the Order of the General Director  
CDN-video LLC  
No. 2 dated "27" Nov. 2023.**

## **POLICY**

regarding the personal data processing on  
website

**(NEW EDITION dated "27" Nov. 2023).**

### **1. GENERAL PROVISIONS.**

1.1. This policy of personal data processing is drawn up in accordance with the requirements of the Federal Law of 27.07.2006. No. 152-FZ "On Personal Data" (hereinafter - the Personal Data Law) and defines the procedure for processing personal data and measures to ensure the security of personal data taken by Limited Liability Company "CDN-video" (hereinafter - the Operator).

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

1.3. This Operator's policy regarding the processing of personal data on the website (hereinafter - the Policy) applies to all information that the Operator may receive about visitors to the website <https://www.cdnvideo.com/>.

## 2. BASIC CONCEPTS USED IN POLICY.

2.1. Automated processing of personal data - processing of personal data by using computer facilities.

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.cdnvideo.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. Depersonalization of personal data - actions that make it 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 or individual entity, independently or jointly with other persons 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 specific or identifiable User of the website <https://www.cdnvideo.com/>.

2.9. Personal data authorized by the subject of personal data for dissemination - personal data, access to which is provided by the subject of personal data to an unlimited number of persons by giving consent to the processing of personal data authorized by the subject of personal data for dissemination in the manner prescribed by the Law on Personal Data (hereinafter - personal data authorized for dissemination).

2.10. User - any visitor to the website <https://www.cdnvideo.com/>.

2.11. Provision of personal data - actions aimed at disclosure of personal data to a certain person or a certain group of persons.

2.12. Dissemination 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 persons, including disclosure of personal data in mass media, placement in information and telecommunication networks or providing access to personal data in any other way.

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

2.14. 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 personal data information system and/or material carriers of personal data are destroyed.

### **3. BASIC RIGHTS AND OBLIGATIONS OF THE OPERATOR.**

3.1. The operator is entitled to:

- receive reliable information and/or documents containing personal data from the subject of personal data;
- continue personal data processing in case the personal data subject revokes his/her consent to personal data processing, as well as to submit a request to stop personal data processing without the consent of the personal data subject, if there are grounds specified in the Personal Data Law;
- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Personal Data Law and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws.

3.2. The operator is obliged to:

- provide the personal data subject, upon his/her request, with information regarding the processing of his/her personal data;
- organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;
- respond to appeals and requests of personal data subjects and their legal representatives in accordance with the requirements of the Law on personal data;
- inform the authorized authority for the protection of the rights of personal data subjects, upon request of this authority, the necessary information within 10 days from the date of receipt of such request;
- publish or otherwise provide unrestricted access to this Policy on personal data processing;
- take legal, organizational and technical measures to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions with regard to personal data;
- stop transfer (dissemination, provision, access) of personal data, stop processing and destroy personal data in the manner and cases stipulated by the Personal Data Law;
- fulfill other duties stipulated by the Personal Data Law.

### **4. BASIC RIGHTS AND OBLIGATIONS OF PERSONAL DATA SUBJECTS.**

4.1. Personal data subjects are entitled to:

- to receive information regarding the processing of his/her personal data, except in cases provided for by federal laws. Information shall be provided to the subject of personal data by the Operator in an accessible form and shall not contain personal data relating to other subjects of personal data, except in cases where there are legal grounds for disclosure of such personal data. The list of information and the procedure for obtaining it is established by the Law on Personal Data;

- demand from the operator to clarify his/her personal data, block or delete them if the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, as well as to take measures provided for by law to protect his/her rights;

- impose the condition of prior consent when processing personal data in order to market goods, works and services;

- revoke the consent to the processing of personal data, as well as to request the termination of personal data processing;

- appeal to the competent authority for the protection of the rights of personal data subjects or in court against illegal actions or inaction of the Operator in the processing of his/her personal data;

- fulfill other rights stipulated by the legislation of the Russian Federation.

4.2. Personal data subjects are obliged to:

- provide the Operator with accurate data about himself/herself;

- notify the Operator about clarification (update, change) of his/her personal data.

4.3. Persons who transferred to the Operator false information about themselves, or information about another subject of personal data without the consent of the latter, shall be liable in accordance with the legislation of the Russian Federation.

## **5. PRINCIPLES OF PERSONAL DATA PROCESSING.**

5.1. Personal data processing is carried out on a lawful and fair basis.

5.2. Personal data processing is limited to the achievement of specific, predetermined and legitimate purposes. Personal data processing incompatible with the purposes of personal data collection is not allowed.

5.3. Databases containing personal data processed for incompatible purposes may not be merged.

5.4. Only personal data that meet the purposes of their processing shall be processed.

5.5. The content and scope of processed personal data correspond to the stated purposes of processing. The redundancy of processed personal data in relation to the stated purposes of their processing is not allowed.

5.6. When personal data are processed, the accuracy of personal data, their sufficiency and, where necessary, relevance in relation to the purposes of personal data processing are ensured. The Operator takes necessary measures and/or ensures that they are taken to delete or clarify incomplete or inaccurate data.

5.7. Storage of personal data is carried out in a form that allows to identify the subject of personal data, not longer than required by the purposes of personal data processing, unless the period of storage of personal data is not established by federal law, contract to which the subject of personal data is a party, beneficiary or guarantor. Processed personal data are deleted or depersonalized when the purposes of processing are achieved or when it is no longer necessary to achieve these purposes, unless otherwise provided for by federal law.

## 6. PURPOSES OF PERSONAL DATA PROCESSING.

<p>6.1. Purpose of processing</p>	<p>The Operator collects and stores only that personal information which is necessary for provision of the Operator's services or fulfillment of agreements and contracts.</p> <p>The Operator processes personal data for the following purposes:</p> <ul style="list-style-type: none"> <li>- Identification of the party within the framework of services, agreements and contracts;</li> <li>- Provision of personalized services and execution of agreements and contracts;</li> <li>- Communication with Users, including sending notifications, requests and information regarding the use of services, fulfillment of agreements and contracts, as well as processing requests and applications from Users;</li> <li>- Improvement of the quality of services, convenience of their use, development of new services;</li> <li>- Targeting of advertising materials;</li> <li>- Carrying out statistical and other research on the basis of anonymized data;</li> <li>- Responding to inquiries and claims sent to the support service;</li> <li>- Administration of the User's account.</li> </ul>
<p>6.2. Personal data</p>	<p>Personal data provided by the User during registration (account creation) or in the process of using the services:</p> <ul style="list-style-type: none"> <li>- contact data (surname, name, patronymic, telephone and fax number, residential address and e-mail);</li> <li>- payment data (card number, expiration date and type, billing address);</li> <li>- demographic data (position, nature of work performed, name and type of company);</li> <li>- profile data, including username and password.</li> </ul>

	<p>Mandatory data for the provision of the Services is marked in a special way.</p> <p>Other details are provided by the User at his/her discretion.</p> <p>Data that is automatically transmitted to the Operator's services in the process of their use using the software installed on the User's device, including IP-address, cookie data, information about the User's browser (or other program with the help of which the services are accessed), technical specifications of equipment and software, date and time of access to the services, addresses of requested pages and other similar information.</p>
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6.3. The Operator doesn't control and isn't responsible for the processing of information by third party websites, which the User can access through links via the Operator's services.

6.4. The Operator doesn't verify the reliability of the personal information provided by the User and has no possibility to assess the User's legal capacity. However, the Operator assumes that the User provides true and sufficient personal information and keeps this information up to date.

6.5. The User's agreement to the processing of personal data is valid during the period of the service use or until the User revokes it.

6.6. This agreement applies to the implementation by the Operator of any necessary actions in relation to Personal Data, including actions necessary to achieve the specified purposes, including without limitation: collection, systematization, accumulation, storage, clarification (update, change), use, transfer (distribution, provision and access), depersonalization, blocking, destruction) with the use of automation tools and/or without the use of such tools, as well as the implementation of any other actions with personal data with the use of the following methods (but not limited to: storage, recording on electronic media and their storage, compilation of lists of personal data). Personal data may be processed by the Operator using the following main methods (but not limited to them): storage, recording on electronic media and their storage, compilation of lists.

## **7. LEGAL BASIS FOR OF PERSONAL DATA PROCESSING.**

7.1. The legal ground for processing of personal data by the Operator are:

- Operator's statutory (founding) documents;
- contracts concluded between the Operator and the subject of personal data;
- federal laws, other regulatory legal acts in the field of personal data protection;

- Users' consent to the processing of their personal data, to the processing of personal data authorized for dissemination.

7.2. The Operator processes the User's personal data only if it's filled in and/or sent by the User himself/herself through special forms located on the website: <https://www.cdnvideo.ru>. Filling in the relevant forms and/or sending their personal data to the Operator, the User expresses their consent to this Policy.

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

7.4. The personal data subject independently decides whether to provide his/her personal data and gives consent freely, of his/her own free will and in his/her own interest.

## **8. PROCEDURE FOR COLLECTION, STORAGE, TRANSFER AND OTHER TYPES OF PERSONAL DATA PROCESSING.**

8.1. The 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.

8.2. The Operator ensures the safety of personal data and takes all possible measures to prevent unauthorized persons from accessing personal data.

8.3. The User's personal data will never, under no circumstances be transferred to third parties, except in cases related to the execution of the applicable law or if the subject of personal data has given consent to the Operator to transfer the data to a third party for the fulfillment of obligations under a civil law contract.

8.4. The period of personal data processing is determined by the achievement of the purposes for which the personal data were collected, unless another period is provided for by the contract or applicable law.

The User may revoke their consent to the processing of personal data at any time.

8.5. All information collected by third-party services, including payment systems, means of communication and other service providers, is stored and processed by these persons (Operators) in accordance with their User Agreement and Privacy Policy. The Operator is not responsible for the actions of third parties, including the service providers mentioned in this paragraph.

8.6. Personal data subject's established prohibitions on transfer (except granting access), as well as processing or conditions of personal data processing (except obtaining access) authorized for dissemination shall not apply in cases of personal data processing in the state, social and other public interest as defined by the legislation of the Russian Federation.

8.7. The Operator ensures confidentiality of personal data during its processing.

8.8. The Operator stores personal data in a form that allows to identify the subject of personal data for no longer than required by the purposes of personal data processing, unless the period of personal data storage is established by federal law, contract to which the subject of personal data is a party, beneficiary or guarantor.



8.9. The conditions for termination of personal data processing may be the achievement of the purposes of personal data processing, expiration of the personal data subject's consent, revocation of consent by the personal data subject or the requirement to terminate personal data processing, as well as the detection of unlawful processing of personal data.

## **9. LIST OF ACTIONS PERFORMED BY THE OPERATOR WITH THE RECEIVED PERSONAL DATA.**

9.1. The Operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (disseminates, provides, accesses), depersonalizes, blocks, deletes and destroys personal data.

9.2. The Operator carries out automated processing of personal data with or without receiving and/or transmitting the received information by information and telecommunication networks.

## **10. CONDITIONS FOR PROCESSING USERS' PERSONAL DATA AND ITS TRANSFER TO THIRD PARTIES.**

10.1. Personal data is kept confidential, except in cases where you voluntarily provide information about yourself for public access to an unlimited range of people.

10.2. The Operator is entitled to transfer personal information to third parties in the following cases:

10.2.1. The User has consented to such actions;

10.2.2. The transmission is necessary for the User to use a certain service or for the fulfillment of a certain agreement or contract;

10.2.3. The transfer is stipulated by Russian or other applicable law within the framework of the procedure established by law;

10.2.4. Such a transfer occurs as part of a sale or other transfer of a business (in whole or in part), and the transferee assumes all obligations to comply with the terms of this Policy with respect to the personal information it receives;

10.2.5. In order to ensure the possibility to protect the rights and legal interests of the Operator or third parties in cases when the User violates the Agreement on the use of the Operator's services.

10.2.6. Personal data processing by depersonalization results in anonymized statistical data, which are transferred to a third party for research, work or services on behalf of the Operator.

## **11. CROSS-BORDER TRANSFER OF PERSONAL DATA**

11.1. The operator is obliged to notify the competent authority for the protection of the rights of personal data subjects of its intention to carry out transborder transfer of personal



data (such notification is sent separately from the notification on the intention to carry out personal data processing) prior to the commencement of transborder personal data transfer activity.

11.2. Before submitting the above-mentioned notification, the Operator is obliged to obtain relevant information from the authorities of a foreign state, foreign individuals, foreign legal entities to whom cross-border transfer of personal data is planned.

## **12. PERSONAL DATA PROCESSING USING COOKIES AND COUNTERS.**

12.1. Cookies transmitted by the Operator to the User's equipment and the User's equipment may be used by the Operator to provide personalized services to the User, to target ads, for statistical and research purposes, as well as to improve services.

12.2. The User's hardware and software may have the function of refusing cookie operations (for any site or for certain sites), as well as deleting previously received cookies.

12.3. Counters placed by the Operator in the services may be used to analyze cookies, to collect and process statistical information on the use of the services, as well as to ensure the operability of the services in general or their individual functions in particular.

## **13. PERSONAL DATA PRIVACY**

13.1. The Operator and other persons who have access to personal data are obliged not to disclose to third parties and not to disseminate personal data without the consent of the subject of personal data, unless otherwise provided by federal law.

## **14. MEASURES TAKEN TO PROTECT USER'S PERSONAL DATA.**

14.1. The Operator takes necessary and sufficient organizational and technical measures to protect the User's personal information from illegal or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions with it by third parties.

14.2. Personal data privacy is ensured by, in particular:

14.2.1. determination of threats to the security of personal data during their processing in personal data information systems;

14.2.2. application of organizational and technical measures to ensure the security of personal data during their processing in personal data information systems, necessary to meet the requirements for personal data protection, the implementation of which ensures the levels of personal data protection established by the Government of the Russian Federation;

14.2.3. using of data protection tools that have passed the compliance assessment procedure in accordance with the established procedure;

14.2.4. assessment of the effectiveness of the measures taken to ensure personal data security before putting into operation of the personal data information system;

14.2.5. accounting of machine-readable personal data carriers;

14.2.6. detecting the facts of unauthorized access to personal data and taking measures, including measures to detect, prevent and eliminate the consequences of computer attacks on personal data information systems and to respond to computer incidents therein;

14.2.7. recovery of personal data modified or destroyed due to unauthorized access to them;

14.2.8. establishing the rules of access to personal data processed in the personal data information system, as well as ensuring the registration and recording of all actions performed with personal data in the personal data information system;

14.2.9. monitoring the measures taken to ensure personal data security and the level of protection of personal data information systems.

14.3. The personal data that the User has provided is protected in several ways. The User's account is accessed by entering a password and a unique customer identifier chosen by the User. This password is encrypted. We recommend using a strong password consisting of alphanumeric characters, which should not be shared with anyone. The User's personal information is stored on secure servers. During the registration process, the User's personal information is encrypted. The Operator makes every effort to protect personal information sent by the User.

## **15. CHANGING AND DELETION OF PERSONAL DATA. MANDATORY DATA STORAGE.**

15.1. The User is entitled at any time to change (update, supplement) the provided personal information or its part, using the function of editing personal data in the personal section of the service.

15.2. The user can also delete the personal information provided by using the "Delete Account" function.

15.3. The rights stipulated by paragraphs 15.1. and 15.2. of this Policy may be restricted in accordance with legal requirements. In particular, such restrictions may stipulate the obligation of the Operator to retain the changed or deleted information for the period of time established by the legislation and to transfer such information in accordance with the legally established procedure to the government authority.

15.4. The User may revoke the consent to the personal data processing at any time on the basis of a written application.

## **16. CONCLUDING STATEMENTS**

16.1. The User may obtain any clarifications on any questions concerning the processing of their personal data by contacting the Operator by e-mail: [info@cdnvideo.com](mailto:info@cdnvideo.com), [support@cdnvideo.com](mailto:support@cdnvideo.com) or by mail: 109028, Moscow, Solyanka Street, 13/3, building 1, 3rd floor.

The Operator is obliged to consider and send a reply to the received request regarding the User's personal data within 10 days from the moment of receipt of the request.

16.2. 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.

16.3. The current version of the Policy is freely available on the Internet at the following website <https://www.cdnvideo.com/privacy-policy-en.pdf>.

16.4. **Data about the Operator:**

**LLC "CDN-video"**

**Taxpayer Identification Number (INN) 7733728241,**

**Tax Registration Reason Code (KPP) 773401001,**

**Primary State Registration Number (OGRN) 1107746205841**

**Location / Mailing address: 13/3 building 1, Solyanka St., 3rd floor, Tagansky Municipal District, Moscow, urban municipal entity of federal significance, 109028.**

**General Director - Gorodetsky Yaroslav Igorevich.**

Signing up for CDN-video LLC services on the website <https://www.cdnvideo.com/privacy-policy-en.pdf>:

- The User agrees that by specifying a phone number or e-mail address in the account settings, the Operator will be entitled to send the User information by short SMS or e-mail about services, news and terms of use of the service, as well as other information, including advertising.
- The User is entitled to refuse to receive such information by independently disabling the function of receiving newsletters by clicking on the special link specified in the e-mail or sending an e-mail to the Operator to the e-mail: [info@cdnvideo.com](mailto:info@cdnvideo.com).
- The User agrees to the provisions of this document and grants the Operator the rights set forth herein.