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OPERATOR'S PERSONAL DATA PROCESSING POLICY

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1. GENERAL CLAUSE

The present Policy defines the process of managing personal data and safety measures provided in «Wellness Digital Group» LLC (hereinafter – Operator) in order to protect personal rights of citizens while processing their personal data, including protection of the right to keep personal and family life private.

The Policy of the Operator in regards to personal data processing (hereinafter – Policy) has been developed in accordance with the Federal Law dated 27.07.2006 #152-FZ “On Personal Data” (hereinafter - FZ-152).

Personal data processing is carried out by the Operator lawfully and fairly and is limited by achieving particular goals that the parties have previously agreed upon, including the agreement on the mobile phone app “Welps”. We would like to draw your attention to the fact that the Operator is not responsible for inaccurate or incomplete information the personal data owner provides.

In the present Policy the following key terms are used:

Personal Data (PD) – any information directly or indirectly related to a particular person (personal data owner);

The Operator collects personal data entered by users into the mobile phone app including:

- data provided by the user themselves by means of the mobile phone app, other services provided by the Operator, including but not limited to: surname, first name, middle name, first name transcribed in English, last name transcribed in English, date of birth, gender, age, weight, height, physical characteristics, access to Phone Contacts on the mobile phone, email address, health data.
- Data which is transmitted automatically into the mobile phone app while using it by means of the software installed, including IP-address, cookies data, user’s browser (or any other software that allows the mobile phone use), date and time of access, URL of the page browsed. The user can amend (renew, add) the personal data (or part of it) provided, as well as the parameters of confidentiality, by using the function of editing personal data either in the settings section or in the mobile app personal setting section.

The user is responsible for updating the existing data, otherwise the Operator is not responsible for not receiving/receiving incomplete information on notifications, goods/services, etc. The user can delete the data provided, however, deleting the account may cause inability to use the app.

The user has the right to annul the permission for personal data processing by sending a written notification by courier post with the list of all the documents attached to the Operator's mailing address.

Information System for Personal Data (ISPD) – the entity of data stored in the data bases of Personal Data which provides its processing by information technology and technical means;

Automated Personal Data Processing – processing of personal data using IT;

Blocking of Personal Data – temporary blocking of processing of personal data (except for the cases when processing is required for clarifying the personal data);

Depersonalisation of Personal Data – actions which result in inability of identification of personal data in relation to a particular individual without other supplementary information;

Processing of Personal Data – any action (operation) or a sequence of actions (operations) on personal data conducted by means of IT and without the latter, including collection, record, saving, storing, reviewing (updating, addition, alteration), usage, transmission (distribution, providing, access), depersonalisation, blocking, removal/disposal of personal data;

Operator – legal company or an individual, independently or in collaboration with others arranging and (or) conducting personal data processing, and also defining the aims for personal data processing, actions (operations) with personal data;

Providing personal data – actions aimed at revealing personal data to a particular person/people;

Distribution of personal data – actions aimed at revealing personal data to an undefined number of people (transmission of personal data) or to familiarising an undefined number of people with the data, including revealing personal data in media, publishing on social media or providing access to personal data by any other means;

Cross-border transmission of personal data – transmission of personal data to a governing body of a foreign country, a foreign company or individual;

Disposal of personal data – actions resulting in inability to restore the content of personal data in ISPD and (or) resulting in physical destruction of medium.

2. PRINCIPLES AND CONDITIONS OF PERSONAL DATA PROCESSING

2.1. Principles of personal data processing

Personal data processing by the Operator is conducted on the following principles:

- Lawful and fair basis;
- Limitations of data processing by achieving particular lawful goals which are set before the process begins;
- Refusal to process personal data which does not comply with the aims of collecting that data;
- Refusal to merge the data bases containing personal data which contradict the goals of the analytical process;
- Processing the personal data in compliance with the processing aim only;
- Compliance of content and amount of the data processed to the processing aims;
- Refusal of excessive data processing in regard to the announced aims of processing;
- Providing accuracy, sufficiency and validity of personal data in regards to the processing aims;
- Disposal or depersonalisation of personal data after achieving the processing aims or in case of deprivation of achieving those aims, in case of Operator's inability to resolve the problem if not stated otherwise.

2.2. Aim and conditions of personal data processing

- Operator processes personal data when at least one of the following conditions is observed:
- Personal data processing is conducted when consent is received from the individual for their data to be processed;
- Personal data processing for achieving goals in compliance with international agreement of the Russian Federation or the law, for fulfilling and conducting lawful obligations of the Russian Federation for the Operator's functions and duties;
- Personal data processing is necessary to fulfil the justice, judicial acts, other acts or officials in compliance with the law of the Russian Federation;
- Personal data processing is necessary to fulfil an agreement in which one of the parties is the person whose personal data is being processed; and also for concluding an agreement initiated by the person whose personal data is processed when that initiator is either a beneficiary or guarantor;
- Personal data processing is essential for obtaining the rights and lawful interests of the Operator or the third parties, or for fulfilment socially important aims on the condition of not breaking the rights and freedom of the individual whose personal data is under processing;
- personal data processing is carried out by an unlimited number of people on the individual's request (hereinafter – publicly available data);
- processing personal data which is going to be published or revealed in accordance with the Federal Law.

- Personal data processing of the User is carried out in accordance with the Law of the Russian Federation. The Operator processes data for:
- identification of the party in agreements and contacts concluded with the Operator and/or partners;
- providing the User goods/services, nonexclusive licence, access to services and the Operator's mobile app;
- contacting the User, sending transactional letters at the instant of receiving registration applications from the User, occasionally, if the User acts on their own, sending notifications and requests to the User;
- sending advertising and/or informative messages to the User;
- checking, examining and analysing the data that allows to support and improve services and the mobile app, as well as to develop new services and sections of the mobile app;
- carrying out statistical and other research based on depersonalised data.
- Processing of the abovementioned personal data can be carried out by means of mixed-method processing, and can include collection, systemising, saving, storing, updating, depersonalising, blocking, removing/disposal of personal data.
- Personal data can be transferred to third parties by means of common networks and international information exchange, using cross-border data transmission to the territory of foreign states, for the User to receive goods/services.

Terms and conditions of Mobile App use and Operator's services:

Using the Mobile App, the User confirms that they :

- own all necessary rights that allow them to register (create an account) and use Services of the Mobile App;
- provide true data about themselves in amount needed for the use of the Mobile App; the compulsory boxes that need to be filled in are marked with a special sign, all other information is provided at the user's discretion.
- realise that personal data provided in the Mobile App can be accessible to third parties not mentioned in the present policy and can be copied and distributed by them;
- have read the present Policy, express the agreement with it and take all the responsibilities listed. Familiarising with the Policy and ticking the box below the link to the present Policy is a written agreement for collection, saving, processing and transmission of personal data provided by the User to third parties.

Operator does not verify credibility of the users' information received (collected), except for the cases when such credibility check is required in order to fulfil obligations to the User.

2.3. Confidentiality of personal data

Operator and other parties who have access to personal data are obliged not to reveal data to third parties and not to distribute personal data without the data owner's consent, if otherwise is not required by the Federal Law.

2.4. Commonly accessible sources/data base

In order to collect data the Operator might create commonly accessible sources of data. Having a written consent from the User, their data provided to the Operator, such as surname, given name, paternal name, date and place of birth, phone number, email address and other personal data, can be included into the Operator's data base.

Such data should be immediately removed from the commonly accessed data base by the User's requirement, User's official representative's requirement or by the court order.

2.5. Special categories of personal data

Data processing conducted by the Operator for specific cases, including such categories of data as race, nationality, political, religious and philosophical views, health condition and personal life, is allowed if:

- there is a written consent from the data owner for personal data processing;
- personal data has been made accessible to public;
- personal data processing is carried out in compliance with the current regulations on social support, labour legislation, Federal Law of the Russian Federation on pensions, retirement pensions;
- personal data processing is needed to protect life, health or other conditions of vital importance for other people and it is impossible to receive a written consent from the data owner;
- personal data processing is conducted to establish the medical diagnosis, providing medical services data processing is carried out by a medical professional who has to keep doctor-patient confidentiality in accordance with the Federal Law of the Russian Federation;
- personal data processing is needed to establish and proceed the property rights of the data owner or the third party, also for establishing justice;
- personal data processing is conducted in accordance with Law.

2.6. Biometrical personal data

Data characterising physiological and biological specific features of a person which can help establish their personality – biometrical personal data – may be processed by the Operator only if there is a consent from the data holder.

2.7. Entrusting personal data processing to the third party

Operator can entrust personal data processing to the third party, given a written consent is provided by the data holder, if otherwise is not stated by the Federal Law, based on the specific agreement. The entrusted party conducting personal data processing must comply with the principles and rules of personal data processing according to the Federal Law 152 and the present Policy.

2.8. Personal data processing for the citizens of the Russian Federation

In accordance with part 2 of the Federal Law dated June 21, 2014 # 242-FZ “On making changes in separate acts of law of the Russian Federation in establishing procedure of personal data processing in the information and telecommunications technology” while collecting personal data, including Internet data collection, Operator is obliged to provide record, systemising, saving, storage, refinement (update, change), extraction of personal data of the citizens of the Russian Federation by using data bases, located in the Russian Federation, except for the cases when:

- personal data processing for achieving the goals is outlined by international agreement of the Russian Federation or the Law for fulfilling lawful obligations of the Russian Federation is laid upon the Operator;
- personal data processing is needed for establishing justice, executing the court act, acts of other authorities or people in charge, that are to be fulfilled in accordance with the Law of the Russian Federation on executive processes (hereinafter – execution of course act);
- personal data processing is needed to execute the jurisdiction of the authorities of federal entities, non-governmental funds, local authorities and organisations participating in providing federal and regional services listed in the Federal Law dated July 27, 2010 #210 –FZ “On providing federal and regional services to citizens and (or) regional portals of federal and regional services” including registration of personal data holder at the united portal of state and municipal services and (or) regional portals of state and municipal services;
- personal data processing is needed for professional journalist activity and (or) lawful media activity in scientific, literature or other creative areas on condition that the rights of the personal data holder(s) are not breached.

2.9. Cross-border personal data processing

Operator is obliged to make sure that the foreign state where the personal data is transmitted has a capability for adequate personal data protection, before the data transmission has been implemented.

Cross-border personal data transmission to foreign states not providing adequate protection of the data holders' rights can be implemented in case if:

- there is a written consent from the data holder for their cross-border data transmission;
- there is an agreement, and the data holder is one of the parties in this agreement.

3. PERSONAL DATA HOLDER'S RIGHTS

3.1. Agreement of the data holder for their data processing

The personal data holder makes a decision to provide personal data and its processing freely, at their own will and in their best interest. Agreement for processing can be given by the data holder or their representative in any form that allows to confirm its reception, if otherwise is not stated in the federal law.

3.2. Personal data holder's rights

The personal data holder has the right to obtain the information from the Operator related to their personal data processing, if the abovementioned right is not limited by the federal law. The personal data holder can request that the Operator updates, blocks or disposes their personal data in case if the personal data is considered incomplete, out-of-date, inaccurate, unlawfully received or are used for purposes other than stated initially; the data holder can also undertake steps for their personal data protection prescribed in the federal law.

Personal data processing aiming to promote goods and services in the market by means of direct contacts with the personal data holder (potential consumer) using various means of communication, as well as for political agitation, is allowed only upon a prior agreement with the data holder.

The Operator is obliged to immediately cease personal data processing for the above mentioned purposes upon the data holder's request.

Decision making based solely on automated personal data processing causing legal consequences for the personal data holder or in any other way breaching their rights, except for the cases established within the federal law or in case of a received holder's consent, is forbidden.

If the personal data holder considers the Operator processes their personal data breaching FZ-152 requirements or in any other way breaches their rights and freedoms, the data holder has a right to appeal to an authorised body in order to protect their rights both as pre-trial and in court.

Personal data holder has a right to protect their rights and lawful interest, including reimbursement of their expenses and (or) compensation for moral.

4. PROVIDING PERSONAL DATA SAFETY

Personal data safety processed by the Operator is provided by implementing lawful, organisational and technical measures required for protecting personal data in accordance with the federal law in part of data safety.

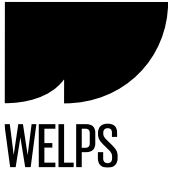
To prevent unauthorised access to the personal data, the Operator implements the following measures:

- appointment of people responsible for organising processing and protection of personal data;
- limitation of the number of people with access to process the personal data;
- familiarising of the personal data holders with the requirement of the federal law and Operator's regulations and acts on processing and protecting data;
- organisation of mainstreaming, storage and turnover of the mediums containing personal data;
- defining potential threats for personal data protection while processing and modelling data protection techniques to confront those threats;
- development of a protection system for personal data using the models;
- continuous checks of efficiency of the means of protection of personal data;
- clear division of the level of users' access to information and hardware involved in data processing;
- registration and mainstreaming the users of the personal data systems;
- implementing antivirus software;
- if needed, implementation of necessary gateways when hacker attacks are detected, analysis of current level of data protection and cryptographic protection of the data;

organisation of permit system for Operator's office/territory, guarding the premises where the technical means of processing personal data are located.

5. CONCLUDING CLAUSES

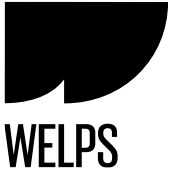
Other rights and obligations of the Operator in regards to personal data processing are defined by the Federal Law of the Russian Federation on personal data processing.



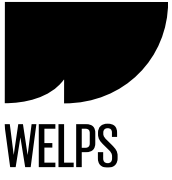
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Operator's employees declared guilty in breaching the norms that regulate processing and protection of the personal data incur monetary, disciplinary, administrative, civil law and criminal responsibility in the order defined by federal laws.

Operator has a right to make changes to the present Policy of Confidentiality. When changes are made, the date of the latest update must be mentioned. New edition of the Policy come into force from the moment of its publication, if otherwise is not stated in the updated version of the Policy. The current version is located on the following page .



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