

THE INTERNATIONAL PLATFORM OF OPPORTUNITIES

PRIVACY POLICY

1. Basic concepts and abbreviations

1.1. For the purposes of the Platform of Opportunities privacy policy, the following basic concepts and abbreviations are used:

– **Privacy policy (hereinafter referred to as the Policy)** – the document that defines the procedure and conditions for processing Users' personal data on the International Platform of Opportunities;

– **International platform of opportunities (hereinafter referred to as the Platform)** – the information resource of the Directorate, presented in the information and telecommunication network "Internet" at <https://wyffest.com>, which includes all of its web pages, subdomains, services, and functionality;

– **Directorate, Operator** – the "World Youth Festival Directorate" Autonomous non-profit organization, Primary State Registration Number (OGRN) 1237700328194, Taxpayer Identification Number (INN) 9704210995, address: 109028, Moscow, inner-city territory of the city of federal significance, Tagansky municipal district, Podkolokolny lane, 10A/2, building 1, which owns the rights to the Platform, which organizes and/or processes personal data, as well as determines the purposes of personal data processing, the composition of personal data to be processed, and the actions (operations) performed with personal data;

– **User, Personal data subject** – an individual who has access to the Platform via the Internet and uses its services to achieve personal or professional goals;

– **Personal data** – any information related directly or indirectly to a specific or identifiable individual (User);

– **Data privacy** – a mandatory requirement for the Operator to prevent personal data dissemination and not disclose data without the consent of the data subject, except in cases explicitly provided for by federal legislation of the Russian Federation.;

– **Personal data processing** – any action (transaction) or set of actions (transactions) made with use of the automation equipment or without use of such means with personal data including collection, record, systematization, accumulating, storage, refining (updating, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, removal, destruction of personal data;

– **Personal data processing using automation tools** – processing of personal data performed using computer technology;

– **Personal data distribution** – the actions directed to disclosure of personal data to the uncertain group of people;

– **Personal data provision** – the actions sent on disclosure of personal data to certain person or certain group of people;

– **Personal data blocking** – the temporary termination of processing of personal data (except as specified if processing is necessary for refining of personal data);

– **Personal data destruction** – the 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;

– **IP address** – the unique network address of a node in a computer network built using the Internet Protocol, which is assigned to the User's device when connected to the Internet;

– **Cookies** – a small piece of data sent by a web server and stored on the User's device, which the web client or web browser forwards to the web server in an HTTP request each time it tries to open the Platform page. Cookies are divided into "session cookies" (which are deleted after closing the browser) and "permanent cookies" (which are stored for a specified period of time).

2. General provisions

2.1. This Policy defines the procedure for processing and protecting the personal data of Users obtained by the Operator when using the Platform. The Policy applies to all User interactions with the Platform.

2.2. This policy of personal data processing is drawn up in accordance with the requirements of the Federal Law dated 27.07.2006 № 152-FZ "On Personal Data" (hereinafter referred to as the Law on Personal Data) and other regulatory legal acts of the Russian Federation in the field of personal data privacy, as well as internal regulations of the Directorate.

2.3. The use of the Platform by the User (including, but not limited to, registration and filling out web forms) constitutes their full and unqualified acceptance of the terms and conditions of this Policy, as well as their informed, specific, and deliberate consent to the processing of their personal data in accordance with the terms and extent specified in the Policy. Such consent is deemed to be granted by the Operator upon the User's performance of specific actions related to the use of the Platform's functionalities.

2.4. If Users do not agree with any of the terms of the Policy, they are obliged to immediately stop any use of the Platform. Continued use of the Platform after the Policy changes take effect means that the User agrees to these changes.

2.5. This Policy sets out the objectives, legal basis, principles, terms and conditions for the processing Users' personal data, as well as their rights and obligations in this regard. It also contains a description of measures implemented by the Operator to ensure the safety and confidentiality of personal data processed.

2.6. The Policy is limited to the relationship that arises in connection with the processing of personal data in the use of the Platform. The Directorate does not control or take responsibility for the processing of personal data carried out by third parties, such as websites and services that a User may click on links available within the Platform. Processing of personal data as part of other activities of the Directorate is governed by separate internal policies.

2.7. The Directorate is the Operator with respect to personal data received directly from Users during their interaction with the Platform. The basis for processing is the consent of the Personal Data Subject, expressed by performing unambiguous actions provided for by the Platform interface.

The legal grounds for processing personal data, depending on the specific actions and goals, are the following:

a) the consent of the Personal data Subject to the processing of their personal data, expressed by performing unambiguous and specific actions provided for by the Platform interface (for the purposes specified in clauses 3.2.1 – 3.2.4, 3.2.6);

б) the need for processing to fulfill a contract to which the Personal data Subject is a party or beneficiary or guarantor, including to provide access to the Platform's functionality (art. 6, paragraph 5, Part 1 of the Federal Law "On Personal Data");

в) the need for processing in order to exercise the rights and legitimate interests of the Operator (art. 6, paragraph 9, Part 1 of the Federal Law "On Personal Data"), in particular, to ensure the safety

and technical operability of the Platform, prevent fraudulent actions (p. 3.2.5), as well as to process impersonal and technical data specified in paragraphs 2.13 – 2.17 of this Policy.

2.8. The Directorate does not verify the accuracy of the personal data provided by the User, as well as their rights in relation to such data. The Operator assumes the good faith of the User who has provided reliable, sufficient and up-to-date information. All responsibility for the consequences of knowingly providing false, incomplete or invalid personal data lies with the User.

2.9 By submitting their personal data, the User confirms that they are acting voluntarily, voluntarily and at their own will, has full legal capacity to perform this action, and the personal data provided by them is reliable and up-to-date. In the case of providing personal data of a minor, consent to their processing is given by their legal representative.

2.10. The processing of personal data of Users can be carried out by the Operator both with the use of automation tools and without their use, in strict accordance with the procedures and security requirements established by law.

2.11. The Policy processes personal data that is not classified by the legislation of the Russian Federation into special or biometric categories. The processing of the provided personal data is carried out within the time limits necessary to achieve the processing objectives specified in Section 3 of this Policy, unless another period is stipulated by the agreement with the User or the applicable legislation of the Russian Federation. Processing may be terminated upon the request of the Personal Data Subject to revoke consent to processing or by filling out a special form on the Platform.

2.12. The list of personal data that the User consents to be processed includes, but cannot be limited to:

- first name, last name, patronymic;
- sex;
- date and place of birth;
- citizenship and place of residence (country, region, city, address);
- identification document data (series, number, name of the issuing authority, date of issue, validity Term, scanned copy);
- information about the place of work (name of the organization, position);
- information about the place of study (institution name, status, specialty);
- contact information (phone, e-mail, social media accounts);
- last name, first name, patronymic and contact details of the parent or legal representative for minor Users (phone, e-mail);
- photo and video image of the User;
- data required for organizational and service support for participation in events, including information about clothing size, food preferences, and any special needs due to health restrictions;
- additional information voluntarily provided by the User when registering for Events, the processing of which is necessary to achieve the goals specified in clause 3.2.6 of this Policy (information about business and personal qualities, copies of documents confirming qualifications and professional achievements: diplomas, certificates, letters of appreciation, etc.).

2.13. During interaction with the Platform, depersonalized data is automatically collected and processed, including data obtained using cookies and similar technologies, such as:

- the IP address of the User's device;
- connection session parameters and information about visited pages;
- browser and device specifications.

2.14. The Directorate uses session cookies to ensure the technical functionality of the Platform, session management, and user behavior analysis on the Platform in an impersonal form.

2.15. The use of session cookies necessary for the functioning of the Platform is based on the legitimate interest of the Operator and does not require the User's separate consent.

2.16. The Platform can use persistent cookies in order to personalize interactions and analyze preferences. These files are stored on the User's device and allow the Platform to recognize it on subsequent visits. By using the Platform, after familiarization with this Policy, is considered consent to the use of such technologies.

2.17. The User has the right to manage cookies through the settings of their web browser, including the possibility of blocking them completely or partially. The Operator warns that disabling cookies necessary for the operation of the Platform may lead to limited or complete inability to use its functionality.

2.18. The data specified in paragraphs 2.12 and 2.13 of the Policy are recognized as personal data in the meaning defined in section 1 of this Policy only if the Directorate has the opportunity to identify a specific individual using them. Data collected in an impersonal form (including aggregated, statistical) and/or lost the property of identifiability is not personal data, and the provisions of the legislation on personal data do not apply to their processing.

3. Purposes of processing Users' personal data

3.1. The Directorate collects and processes Users' personal information to the minimum extent necessary and appropriate to achieve specific, predetermined legitimate objectives, except in instances where federal laws of the Russian Federation require the retention of personal data for a specified period.

3.2. The Directorate undertakes the processing of Users' personal information exclusively for the following legitimate purposes:

3.2.1. Identification of the User within the framework of the Platform, providing them with the opportunity to register (create an account) and authorization.

3.2.2. Providing the User with personalized Platform functionality, including access to resources and content tailored to their needs and settings.

3.2.3. Providing User feedback, sending notifications, information messages, requests related to the use of the Platform, as well as processing requests, applications and messages received from the User.

3.2.4. Providing customer and technical support to the User, including reviewing complaints, troubleshooting, and solving problems that arise when using the Platform.

3.2.5. Ensuring the security, integrity, and smooth operation of the Platform; confirming User actions; preventing, detecting, and investigating fraudulent activities, computer attacks, unauthorized access, and other illegal actions against the Platform.

3.2.6. If the User participates or potentially participates in events organized by the Directorate (hereinafter referred to as Events), personal data is additionally processed for the following purposes:

- identification and verification of the User as an Event participant;
- organizational interaction with the User, including informing about the procedure, program and conditions of participation in Events;
- sending information and news materials related to Events;

- registration of all necessary documentation related to the User's participation in Events (official invitation, visa invitation, etc.);
- compliance with the requirements of the current legislation of the Russian Federation, compliance with the instructions and requests of authorized state bodies, local governments, as well as judicial acts;
- ensuring the necessary level of security, including verification of user information by the competent authorities, compliance with the security clearance and control of its compliance, including registration of a document for access to the event venue, video surveillance and video recording on the territory and in buildings / premises / event venues;
- conducting statistical and analytical analysis of data on participants of Events (by territorial, age, professional and other characteristics) for the purposes of reporting and improving the organization of Events;
- achieving other legitimate goals directly related to the specifics of the Events and the requirements for their implementation.

4. Terms for the personal data processing and the transfer thereof to third parties

4.1. The storage of Users' personal data is carried out by the Operator in accordance with internal regulations and security policies developed for individual services and data processing systems, in compliance with the requirements of the legislation of the Russian Federation.

4.2. The Operator ensures the confidentiality of the User's personal data being processed, except the following cases:

- When the User has explicitly and voluntarily provided access to their personal data to an unlimited number of people using the functionality of the Platform;
- When individual personal data, due to its nature or the functional purpose of a particular Platform service, is publicly available by default (for example, the username for posting reviews on the Platform).

4.3. The transfer of the User's personal data to third parties is carried out by the Operator only if there is one of the following legal grounds:

- 4.3.1. The user of the Platform has consented to the processing and transfer of personal data;
- 4.3.2. The transfer is necessary to fulfill the agreement to which the User is a party, or to perform actions at their request prior to the conclusion of the agreement.
- 4.3.3. The transfer is provided for by the current legislation of the Russian Federation (in order to comply with the requirements of authorized state bodies, as part of procedural actions, etc.).
- 4.3.4. The transfer is necessary to achieve the legitimate processing purposes specified in section 3 of this Policy, and is carried out strictly to the minimum extent necessary to perform the tasks listed below, in particular, to the following categories of recipients:

- official partners, co-organizers, contractors and service providers involved in organizing Events, providing service and information support to Users. The transfer of data to such recipients is regulated by relevant regulatory documents on the conduct of events and agreements on the processing of personal data, obliging them to ensure the security and confidentiality of data, as well as to use them exclusively to fulfill specific contractual obligations and functions within the framework of such Events.;

- official partners who register for their Events on the Operator's Platform, who, in turn, can transfer the personal data of their registered participants to the contracting organizations they have engaged. Such transfer is carried out strictly to the extent necessary for the provision of services for the

organization of relevant Events, on the basis of personal data processing agreements and in full compliance with the requirements of the legislation of the Russian Federation.

4.3.5. When transferring personal data to such recipients, the Directorate takes all measures provided for by law to ensure their confidentiality and security, and also requires these third parties to comply with the requirements of the Federal Law "On Personal Data", including in terms of ensuring an appropriate level of protection of the transferred data.

4.4. The user, as a Subject of personal data, has all the rights provided for in Chapter 3 of the Federal Law "On Personal Data", including the right to:

- obtain information related to the processing of their personal data provided for in Article 14 of the Federal Law "On Personal Data";
- access to, clarification of, blocking or destruction of personal data in cases provided for by law;
- revoke consent to the processing of personal data;
- take measures stipulated by law to protect their rights;
- appeal against the actions or omissions of the Operator. The exercise of these rights is carried out by sending a corresponding request to the Operator at the address specified in section 1 or by e-mail: help@wyffest.com.

4.5. The Operator is obliged to stop processing and ensure the destruction of personal data within a period not exceeding 30 (thirty) days from the date of receipt of the revocation of consent, established by the legislation of the Russian Federation upon receipt from the User of the revocation of consent to processing or by filling out a special form on the Platform. If a special form for revocation of consent is not implemented on the Platform, the right to revocation is exercised by sending a request to the contacts specified in clause 9.4 of these Rules.

5. Obligation of parties

5.1. The User is obliged to:

5.1.1. Provide the Operator with reliable, complete and up-to-date information about their personal data necessary to use the Platform's functionality and achieve the processing objectives set out in Section 3 of this Policy;

5.1.2. Update the provided personal data in a timely manner by making changes and additions to them using the Platform's functionality or by sending a corresponding request in accordance with paragraph 4.4 of this Policy, in case of changes.

5.2. The Directorate (Operator) undertakes to:

5.2.1. Process the User's personal data solely for the purpose of achieving the legitimate and specific purposes provided for in Section 3 of this Policy.

5.2.2. Ensure the confidentiality of the personal data being processed, not to disclose or distribute them without the User's prior consent, except in cases expressly provided for by this Policy or the federal legislation of the Russian Federation.

5.2.3. Block unlawfully processed personal data related to the User upon receipt of a reasoned request from:

- the User or their legal representative;
- the authorized body for the protection of the rights of personal data Subjects.

The blocking of personal data is carried out for the period of verification of the legality and reliability of the grounds for processing specified in such a request.

6. Responsibility of the parties

6.1. The Directorate (Operator) is responsible, as established by the legislation of the Russian Federation, for unauthorized access to personal data, their intentional disclosure, loss or other violations of the requirements of the Federal Law "On Personal Data" and this Policy, with the exception of cases explicitly specified in this section.

6.2. The Directorate shall be relieved of liability for the loss or unauthorized disclosure of the User's personal information if it can be proven that:

6.2.1. The relevant data was already publicly available at the time of its loss or disclosure.

6.2.2. The data was lawfully received by the Directorate from a third party until it was received directly from the User.

6.2.3. The disclosure occurred with the direct, specific and documented consent of the User themselves.

6.2.4. The loss or disclosure was the result of illegal actions by third parties aimed at overcoming the information protection measures implemented by the Operator (unauthorized access), despite the Operator's compliance with all technical and organizational security measures established by law.

6.3. The User is solely responsible for ensuring that the personal data they provide is legal, reliable, complete, and up-to-date, as well as any consequences that may arise from providing false, incomplete, or outdated information. This includes any losses that may result to the Company or third parties as a result of such information.

7. Personal data protection

7.1. During the processing of personal data, the Directorate (Operator) shall take all necessary and appropriate legal, organizational, and technical measures to ensure their protection from unlawful or accidental access, destruction, modification, blocking, copying, distribution, and other unlawful acts in accordance with the provisions of Article 19 of the Federal Law "On Personal Data" and other relevant regulatory legal acts in the field of information security.

8. Dispute settlement procedure

8.1. The claims procedure for the settlement of disputes arising out of questions related to the handling of personal data and use of the Platform is mandatory. Any dispute must be submitted in writing by the affected party to the address provided in section 1 of this Policy.

8.2. The Party receiving the claim is obliged to consider it on its merits and send a reasoned response to the applicant within 30 (thirty) calendar days from the date of its receipt.

8.3. If the dispute has not been settled in a pre-trial (claim) procedure, it is subject to consideration in court at the Operator's location in accordance with the current procedural legislation of the Russian Federation.

8.4. This Policy and any legal relations arising from the processing of personal data and the use of the Platform are subject to the laws of the Russian Federation.

9. Final provisions

9.1. The Directorate reserves the right to make unilateral amendments to the text of this Policy to bring it into line with changes in the legislation of the Russian Federation or to optimize internal data processing procedures. Amendments made to bring the Policy into line with changed legislation of the Russian Federation shall come into effect immediately upon publication. Other amendments shall come into force 10 calendar days after publication of the updated version on the Platform. No consent from the User is required for such amendments.

9.2. The new version of the Policy will take effect from the moment it is published (posted in an updated form) on the Platform, unless otherwise specified in the text of the new version.

9.3. The User agrees to independently and regularly review the current version of this Policy. The Provider is not responsible for notifying each individual User of changes to the Policy. By continuing to use the Platform after a new version of the Policy has been published, the User acknowledges and agrees to be bound by its terms and conditions.

9.4. All questions related to the processing of personal data and the exercise of the Personal Data Subjects rights can be addressed to the following email address: help@wyffest.com or to the postal address of the Directorate specified in section 1 of this Policy, marked "On personal data protection issues".