PRIVACY POLICY

This Personal Data Privacy Policy (the “Privacy Policy”) is effective as of June 13, 2023 in relation to all information that the Open Nationwide Competition with international participation for the development of architectural, planning and urban solutions for the development of the future tourist area of the New Anapa Nationwide beach family resort (resort city of Anapa, Krasnodar region) (the “Nationwide competition”), located at the domain name novayaanapa.com, may receive about the User during the use of the site of the Nationwide competition.

1. DEFINITION OF TERMS

Site Administration of the Nationwide competition website (the “Site Administration”)—personnel authorized to manage the website, acting on behalf of Tourism.RF Corporation JSC, who organize and (or) process personal data, as well as determine the purpose of personal data processing, the composition of the personal data to be processed, and the actions (operations) performed with personal data.

Personal data—any information relating to a directly or indirectly identified or identifiable individual person (owner of personal data).

Personal data processing—any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including the collection, recording, systematization, acquisition, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, removal, or destruction of personal data.

Confidentiality of personal data—a mandatory requirement for the Site Administration or any other party who has access to personal data to comply with the requirement not to allow its distribution without the consent of the owner of personal data or other legal grounds.

User of the Nationwide competition website (a “User”)—a person who accesses the website through the Internet and uses the Nationwide competition site.

Cookie—a small piece of data sent by a web server and stored on the user’s computer and which the web client or web browser sends to the web server each time it tries to open a page of the corresponding website.

IP address—the unique network address of a node on an IP-based computer network.

2. GENERAL PROVISIONS

2.1 The User’s use of the Nationwide competition website constitutes consent to this Privacy Policy and the terms for the processing of the User’s personal data.

2.2 In the event of non-agreement to the terms of this Privacy Policy, use of the Nationwide competition website must cease.

2.3 This Privacy Policy applies only to the Nationwide competition website. The Nationwide competition does not control and is not responsible for the websites of third parties which the User can access by following links available on the Nationwide competition website.

2.4 The Site Administration does not verify the accuracy of the personal data provided by the User of the Nationwide competition website.

3. SUBJECT OF PRIVACY POLICY

3.1 This Privacy Policy establishes the obligations of the Site Administration for the Nationwide competition website for the non-disclosure and protection of the confidentiality of the personal information that the User provides at the request of the Site Administration of the Nationwide competition website during registration on the Nationwide competition website.
3.2 The personal data authorized to be processed under this Privacy Policy is provided by the User by completing the registration form on the Site of the Nationwide competition:
   • User’s full name;
   • User’s contact phone number;
   • email address;
   • User’s place of residence.

3.3 The Site Administration protects Data which is automatically transferred in the process of viewing ad units and when visiting pages on which the system statistical script ("pixel") is installed:
   • IP address;
   • information from cookies;
   • information about the browser (or other program that accesses advertising);
   • access time;
   • address of the page on which the ad unit is located;
   • referrer (address of the previous page).

3.4 Disabling cookies may result in the inability to access the parts of the Nationwide competition website that require authorization.

3.5 The Nationwide competition website collects statistics about the IP addresses of its visitors. This information is used to identify and solve technical problems and to monitor the legality of financial payments.

3.6 Any other personal information not specified above (purchase history, browsers and operating systems used, etc.) shall be securely stored and not disclosed except as provided in clauses 5.2. and 5.3. of this Privacy Policy.

4. PURPOSE OF COLLECTING USER’S PERSONAL INFORMATION

4.1 The User’s personal data may be used by the Site Administration of the Nationwide competition website for the following purposes:
   • identification of the User registered on the website of the Nationwide competition to submit an Application;
   • provision of the User with access to the personalized resources of the Nationwide competition Site;
   • making contact with the User, including by sending notices, requests regarding the use of the Site of the Nationwide competition, the provision of services, or the processing of requests and applications from the User;
   • determination of the User’s location to ensure security and for the prevention of fraud;
   • confirmation of the accuracy and completeness of the personal data provided by the User;
   • creation of an account if the User has agreed to create an account;
   • notification of the User of the Nationwide competition Site of the status of an Application;
   • provision of the User with effective client and technical support in the event of problems related to the use of the Site of the Nationwide competition;
   • provision of the User, with the User’s consent, with product updates, special offers, pricing information, newsletters, and other information on behalf of the Nationwide competition or on behalf of Nationwide competition partners.

5. METHODS AND TERMS OF PERSONAL DATA PROCESSING

5.1 The processing of the User’s personal data shall be performed without limitation of time and by any legal method, including in information systems of personal data with or without the use of automation tools.

5.2 The User agrees that the Site Administration has the right to transfer personal data to third parties, in particular, to courier services, postal organizations, or telecommunications operators, solely for the purpose of an order that the User executes on the Site of the Nationwide competition.
5.3 The User’s personal data may be transferred to authorized state bodies of the Russian Federation only on the grounds and in the manner prescribed by the legislation of the Russian Federation.

5.4 If personal data is lost or disclosed, the Site Administration shall inform the User of the loss or disclosure of personal data.

5.5 The Site Administration takes the necessary organizational and technical measures to protect the User’s personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, or other illegal actions by third parties.

5.6 The Site Administration, together with the User, shall take all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of personal data of the User.

6. OBLIGATIONS OF THE PARTIES

6.1 The user shall:
   • provide information about personal data necessary to use the Site of the Nationwide competition;
   • update or supplement the information on personal data provided in the event of changes to this information.

6.2 The Site Administration shall:
   • use the information received solely for the purposes specified in clause 4 of this Privacy Policy;
   • ensure that confidential information remains secret, not disclose without the prior written consent of the User, nor sell, exchange, publish, or disclose by any other possible method the personal data transferred by the User, except for in the circumstance outlined in clauses 5.2, and 5.3. of this Privacy Policy;
   • take precautions to protect the confidentiality of the User’s personal data in accordance with the procedure usually used to protect this kind of information in existing business transactions;
   • block personal data relating to the relevant user, from the date of application or request by the User, by his/her legal representative, or by the authorized body for the protection of the rights of owners of personal data for the period of verification, in the event of unreliable personal data or unlawful actions.

7. LIABILITIES OF THE PARTIES

7.1 In not meeting its obligations, the Site Administration shall bear responsibility for losses incurred by the User due to the unlawful use of personal data in accordance with the legislation of the Russian Federation, except as stipulated by Clauses 5.2, 5.3, and 7.2 of this Privacy Policy.

7.2 The Site Administration is not responsible in the event of the loss or disclosure of Confidential Information if this confidential information:
   • enters the public domain before it is lost or disclosed;
   • is received from a third party prior to its receipt by the Site Administration;
   • is disclosed with the User’s consent.

8. DISPUTE RESOLUTION

8.1 Prior to judicial proceedings on claims for disputes arising from the relationship between the User of the Nationwide competition website and the Site Administration, it is mandatory to submit a claim (a written proposal for a voluntary settlement of the dispute).

8.2 The recipient of the claim shall, within 30 calendar days of receipt of the claim, notify the claimant in writing of the results of consideration of the claim.

8.3 If no agreement is reached, the dispute will be referred to a judicial authority in accordance with the applicable legislation of the Russian Federation.
8.4 This Privacy Policy and the relationship between the User and the Site Administration are governed by the applicable legislation of the Russian Federation.

9. ADDITIONAL CONDITIONS

9.1 The Site Administration has the right to make changes to this Privacy Policy without the consent of the User.

9.2 The new Privacy Policy will be effective from the moment it is posted on the Nationwide competition Site, unless otherwise provided for in the new Privacy Policy.

9.3 Any suggestions or questions about this Privacy Policy may be submitted to the Nationwide competition Site at info@novayaanapa.com.

9.4 The current Privacy Policy is available at novayaanapa.com.