

Privacy and Processing Policy personal data of site users

General provisions

This Privacy Policy and Personal Data Processing Statement users of the site (hereinafter referred to as the Regulations) is an official document of the Company with limited liability of "i-Sys Labs", which is a legal entity, registered in accordance with the legislation of the Russian Federation, located at 443079, Samara, st. Avrory, 114A, building 6, office center "Leader", floor 3, (hereinafter referred to as the "Company" / "Operator"), and determines the procedure for processing and protection of information about individuals (hereinafter referred to as Users) using services, information, services, programs (including loyalty programs) and products of the site located at <http://doctrix.ru/> (hereinafter referred to as the Site).

Confidentiality is important to the Company because purpose of this Policy confidentiality is to ensure the protection of the rights and freedoms of man and citizen when processing his personal data, including the protection of the rights to inviolability privacy, personal and family secrets, from unauthorized access and disclosures.

The Privacy Policy describes how the processing of personal data - any actions (operations) or a set of actions (operations), committed with the use of automation tools or without the use of such 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.

Relationships related to the processing of personal data and information about users of the Site are governed by these Regulations, other official documents Operator and the current legislation of the Russian Federation. The processing of personal data is carried out on a legal and fair basis, reasonably and in good faith on the basis of the principles:

- legality of the purposes and methods of processing personal data;
- conscientiousness;
- compliance of the purposes of processing personal data with the purposes predetermined and declared during the collection of personal data, as well as the powers of the Company;

- compliance with the volume and nature of the processed personal data, methods processing of personal data for the purposes of processing personal data.

This Privacy Policy governs any kind of processing personal data and information of a personal nature (any information, personally identifiable information and any other related information) about individuals who are consumers of the Company's products or services.

This Policy applies to the processing of personal, personal data, collected by any means, both active and passive, both through the Internet and and without using it, from persons located anywhere in the world.

This Policy applies to all information posted on the Site Companies on the Internet, as well as in relation to any information about the User, which the Company can receive in the process of using the Site, its services, services and products or services of the Company.

The User's access to the Company's Website and/or the User's use of services The Site means the User's unconditional consent to the terms of this Regulation and the conditions for processing the User's personal data specified therein.

In case of disagreement with these conditions, the User must refrain from use of the Company's Website and its services.

Terms and Definitions

This Regulation uses the following terms and their definitions:

- Personal data - any information relating directly or indirectly to certain or identifiable natural person (subject of personal data);
- Operator - a state body, municipal body, legal and natural person, alone 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, as well as determining the purposes of processing personal data, the composition of personal data, subject to processing, actions (operations) performed with personal data;
- Processing of personal data - any action (operation) or aggregate actions (operations) performed using automation tools or without the use of such means, with personal data, including the collection, recording, systematization, accumulation, storage, clarification (updating, changing),

extraction, use, transfer (distribution, provision, access),
depersonalization, blocking, deletion, destruction of personal data;

- Automated processing of personal data - processing of personal data using computer technology;
- Dissemination of personal data - actions aimed at disclosure personal data to an indefinite circle of persons;
- Providing personal data - actions aimed at disclosure personal data to a certain person or a certain circle of persons;
- Blocking of personal data - suspension of processing personal data (unless the processing is necessary for clarification of personal data);
- Destruction of personal data - actions that result in it is impossible to restore the content of personal data in the information system of personal data and (or) as a result of which the material carriers of personal data;
- Depersonalization of personal data - actions that result in impossible to determine without the use of additional information belonging of personal data to a specific subject of personal data;
- Information system of personal data - a set of data contained in databases of personal data and ensuring their processing information technologies and technical means;
- Cross-border transfer of personal data - transfer of personal data to the territory of a foreign state to the authority of a foreign state, foreign individual or foreign legal entity

Collection of personal data

The purpose of personal data processing is:

- ensuring the protection of the rights and freedoms of a person and a citizen when processing it personal data, including the protection of the rights to privacy life, personal and family secrets;
- promotion of the Company's services on the market through direct contacts with potential clients;
- conclusion and execution of agreements between the Company and Users;
- fulfillment of the obligations of the Company to the Users in relation to the services of the Company, the use of the Site and its services.

The processing of personal data of users is carried out with the consent of the subject of personal data to the processing of his personal data.

Personal data refers to any information relating directly or indirectly identified or identifiable natural person (subject of personal data), which can be used to identify a specific person or contact him.

The request for the User's personal data can be made at any time, including when the User contacts the Company. The Company may use such data in accordance with this Privacy Policy. It may also combine such information with other information for the purposes of providing and improving its products, services, content and communications.

The following are some examples of the types of personal data that the Company may collect and how such information may be used.

The Company may process (collect, systematize, accumulate, store, clarify (update, change), use, distribute (transfer), depersonalize, block and destroy) the following personal data:

- name and surname,
- date of birth;
- sex, marital status;
- postal address;
- phone number;
- email address;
- information about selected contacts;
- information about bank cards;
- passport details;
- information about citizenship;
- family, social status;
- information about education;
- information about professional activity;
- monetary and other liabilities

Personal data may also include additionally provided by the Users at the request of the Operator in order to fulfill the obligations of the Operator to the Users arising from the service agreement. The Operator has the right, in particular, to request from the User a copy of an identity document or other document containing the name, surname, photograph of the User, as well as other additional data that, at the discretion of the Operator, will be necessary and sufficient to identify such a User and allow exclude abuse and violation of the rights of third parties.

When the User invites other persons to the events and activities of the Company or invites them to communicate, the Company may collect personal data provided by the User about these persons, such as: name, surname, date of birth, postal address, e-mail address and telephone number.

When processing personal data, the Company ensures the accuracy of personal data, their sufficiency, and, if necessary, relevance in relation to the purposes of processing personal data.

Storage and use of personal data

Users' personal data is stored on electronic and/or paper media and processed using automated and non-automated systems. The collected personal data allows you to send notifications to the User about new products, special offers and various events. They also help the Company improve its services, content and communications. If the User does not wish to be included in the mailing list, he can unsubscribe at any time by informing the specified contacts for feedback, as well as making changes in the settings of his profile on the site.

From time to time, the Company may use the User's personal data to send important notices containing information about changes in terms, conditions and policies, as well as confirming orders placed / purchases made / services ordered. Since such information is important for the relationship with the Company, the User cannot refuse to receive such messages.

The Company may also use personal information for internal purposes, such as: conducting audits, analyzing data and various studies in order to improve the Company's products and services, as well as interacting with consumers.

If the User participates in a prize draw, contest or similar promotional event, the Company reserves the right to use the personal data provided to manage such programs.

Also, the Company may collect personal data that is not personal - data that does not allow direct association with any specific person. The Company may collect, use, transfer and disclose non-personal information for any purpose. The following are examples of the non-personal information the Company collects and how it may use it:

The Company may collect personal data such as: occupation, language, zip code, unique device identifier, location and time zone in which a particular product is used in order to better understand consumer behavior and improve their products, services and communications.

The Company may collect personal data/information about what the user is interested in on the Company's website when using other products and services. Such personal data/information is collected and used in order to help the Company provide more useful information to its customers and to understand which elements of the site, products and services are most interesting. For the purposes of this Privacy Policy, aggregate data is treated as non-personal data/information.

If non-personal information is combined with personal information, such combined information will be treated as personal information for as long as such information is combined.

Transfer of personal data

Users' personal data is not transferred to any third parties, except as expressly provided for by these Rules.

The processing of the User's personal data is carried out without time limit, in any legal way, including in personal data information systems using automation tools or without using such tools.

The User agrees that the Operator has the right to transfer personal data to third parties, in particular, courier services, postal organizations, telecommunications operators, etc., solely for the purposes specified in the "Personal Data Collection" section of this Privacy Policy.

When specifying the user or with the consent of the user, it is possible to transfer the User's personal data to third parties that are the Operator's counterparties, provided that such counterparties undertake obligations to ensure the confidentiality of the information received, in particular, when using applications.

Applications used by Users on the Site are hosted and maintained by third parties (developers) who act independently of the Operator and do not act on behalf of or on behalf of the Operator. Users are obliged to independently familiarize themselves with the rules for the provision of services and the personal data protection policy of such third parties (developers) before using the respective applications.

The User's personal data may be transferred at the request of the authorized state authorities of the Russian Federation only on the grounds and in the manner established by the legislation of the Russian Federation.

The Operator blocks personal data relating to the relevant User from the moment the User or his legal representative or authorized body for the protection of the rights of personal data subjects applies or requests for the period of verification, in case of revealing inaccurate personal data or illegal actions.

Within the framework of this Regulation, the Company does not carry out cross-border transfer of personal data of Users.

Disclosure to third parties

In some cases, the Company may provide certain personal information and data to strategic partners who work with the Company to provide products and services, or to those who help the Company sell products and services to consumers. The Company provides third parties with the minimum amount of personal data necessary only to provide the required service or conduct the necessary transaction.

Personal information will be provided by the Company only for the purpose of providing consumers with products and services, as well as to improve these products and services, related communications. Such information will not be provided to third parties for their marketing purposes.

To use personal data for any other purpose, the Company asks the User for Consent to the processing of his personal data.

The Company provides personal data/information to Companies providing such services as: information processing, provision of loans, execution of consumer orders, delivery, other types of customer service, determination of the User's interest in products and services, conducting surveys aimed at studying consumers or satisfaction with the quality of service . Such companies undertake to protect the User's information regardless of the country of their location.

The Company may be required by law, court order, legal proceedings and / or based on public requests or requests from government agencies in or outside the User's country of residence to disclose personal data. The Company may disclose personal data / information about the User if it determines that such disclosure is necessary or appropriate for national security, law enforcement or other publicly important cases.

The Company may also disclose personal data / information about the User if it determines that disclosure is necessary to enforce the terms and conditions of

the Company or for the purposes of protecting activities and users. Additionally, in the event of a reorganization, merger or sale, the Company may transfer any or all of the personal information it collects to the relevant third party.

Destruction of personal data

The user's personal data is destroyed when:

- self-deletion by the User of data from his personal page (if such pages are provided by the functionality of the site) using the "delete account" functionality available to the User using the profile settings;
- removal by the Operator of information posted by the User, as well as the User's personal page in cases established by the contract of sale (offer);
- when the subject of personal data withdraws consent to the processing of personal data.

Identification files (cookies) and other technologies

The website, interactive services and applications, e-mail messages and any other communications on behalf of the Company may use cookies and other technologies such as pixel tags, web beacons. Such technologies help the Company to better understand user behavior, report which parts of the site users have visited, and measure the effectiveness of advertising and online searches. The Company treats information collected by cookies and other technologies as non-personal information. The goal of the Company in such cases is to provide a more convenient and personal interaction with the Company. For example, knowing the User's name, the Company can use it in its communications. Knowing that someone, using the User's computer or device, has purchased a certain product or used a certain service, the Company can ensure that advertising messages and e-mail messages are more fully tailored to the interests of the User. Ultimately, all this knowledge helps to provide Users with the highest quality service.

A cookie is a small text file that a web server places on your computer's hard drive. A distinction is made between "session" and "persistent" cookies. The Company may use session cookies to assign a unique identification number to your computer each time a User visits the Site. Session cookies are deleted after the browser is closed. They are used to maintain the functionality of our websites.

When allowed, the Company may use persistent cookies, which are not deleted immediately after the web browser is closed, but remain on the computer for a certain period of time or until the User deletes them. Each time the User visits the Site, the Company's web server recognizes persistent cookies stored on the hard drive of the User's computer. By assigning a unique identifier to the User's device, the Company can create a database of the User's actions and preferences. At the same time, cookies do not contain personal data, but only record actions on the User's computer. If the User accesses the Site through a link that was sent to his email, or creates a "user ID" during one of his visits, the information provided by cookies may be linked to information in the records of the Company, which will make it possible to identify the User.

Session cookies do not require the prior consent of the User, as they are necessary for the operation of the Site and will be deleted after the web browser is closed.

Persistent cookies that track past actions and preferences of the User, but are not necessary for the operation of the Site, require the User's prior consent.

By visiting the Site, the User expresses his consent to the use of persistent cookies, unless he changes his computer settings so that these cookies are not saved. The same applies to third party cookies.

The user can disable cookies in the settings of the web browser or mobile device he uses. However, please note that some functions of the website may not be available after disabling cookies.

Setting your web browser is a free and effective way to manage cookies. You can make one of the following decisions:

- allow the use of all cookies integrated into the pages. Note: on the one hand, only their publishers will have access to these cookies; on the other hand, this process is not irreversible and you can always delete these cookies later (the procedure for managing cookies differs depending on the browser you use; please refer to the relevant instructions)
- block cookies on your device. In this case, we are obliged to warn that the navigation of the site will be difficult. Some features require the use of cookies (for example, to recognize your operating system and preferred language). Therefore, we are not responsible for any inconvenience caused by our services not working properly due to disabling cookies
- enable the use of cookies on request on a case-by-case basis
- accept or reject cookies depending on their publisher

The procedure for managing cookies varies depending on the browser used. More detailed instructions are available at the links below:

- [Internet Explorer](#)
- [Chrome](#)
- [Safari](#)
- [Firefox](#)
- [Opera](#)

As with most websites, the Company collects some information automatically and stores it in statistics files. Such information includes Internet Protocol (IP) address, browser type and language, ISP information, referral and exit pages, operating system information, date and time stamp, and visit history. The Company uses such information to understand and analyze trends, administer the site, study user behavior on the site, and collect demographic information about the general population of users. The Company may use such information for its own marketing purposes.

In some e-mail messages, the Company may use interactive links to information posted on the Company's website. When users click on such links before they reach the destination page on the Company's website, their requests go through a separate registration. A company can track such "pass-through" data to help it determine interest in particular topics and measure the effectiveness of communications with consumers. If the User prefers that hits not be tracked in this way, the User should not follow text or image links in email messages.

Pixel tags allow the Company to send email messages in a consumer-readable format and indicate whether such messages have been read. The Company may use such information to limit the number of messages sent to consumers or stop sending them.

Protection of personal information

The Company takes precautions - including legal, organizational, administrative, technical and physical - to ensure the protection of the User's personal data in accordance with Art. 19 of the Federal Law of July 27, 2006 N 152-FZ "On Personal Data" in order to ensure the protection of the User's personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

When a User uses certain products, services or applications of the Company or posts on forums, chat rooms or social networks, the personal data provided is visible to other users and can be read, collected or used by them. The user is responsible for the personal data that you choose to provide, in such cases yourself. For example, if a User enters their name and email address in a forum post, such information is public. Please take precautions when using such functions.

Integrity and preservation of personal information

By interacting with the Company, the User can easily keep his personal data and information up to date. The Company will store the User's personal data and information for the period necessary to fulfill the purposes described in this Privacy Policy, except when a longer period of data and information storage is required in accordance with the law or permitted by it.

In order to make sure that the User's personal data is safe, the Company communicates confidentiality and security standards to the Company's employees and strictly monitors the implementation of confidentiality measures within the Company.

Third Party Sites and Services

The Company's websites, products, applications and services may contain links to websites, products and services of third parties. The Company's products and services may also use or offer products or services from third parties. Personal data and information collected by third parties, which may include information such as location data or contact information, is subject to the privacy practices of such third parties. The Company encourages the User to study the privacy practices of such third parties.

The Operator is not responsible for the actions of third parties who, as a result of using the Internet or the Site Services, have access to information about the User and for the consequences of using data and information that, due to the nature of the Site, are available to any Internet user.

Questions and appeals of Users to the Company

If the User has any questions regarding the Company's Privacy Policy or the processing of data by the Company, the User may contact the Company using the contacts for feedback.

Users have the right to send their requests to the Operator, including requests regarding the use of their personal data, sending a withdrawal of consent to the processing of personal data in writing to the address specified in the General Provisions section of this provision, or in the form of an electronic document signed with a qualified electronic signature in accordance with legislation of the Russian Federation, and sent to the contacts for feedback.

The request sent by the User must comply with the requirements established by the Rules for submitting applications to the Service and Support Service, namely, contain:

- number of the main identity document of the user or his representative;
- information about the date of issue of the specified document and the authority that issued it;
- information confirming the user's participation in relations with the Operator (in particular, the user's id serial number or a short (subdomain) name that replaces the id serial number (if such is provided for by the functionality of the website));
- signature of the User or his representative;
- E-mail address;
- contact number

The Operator undertakes to consider and send a response to the User's request within 30 days from the date of receipt of the request.

Other conditions

The current legislation of the Russian Federation applies to this Privacy Policy and the relationship between the User and the Operator.

In everything that is not directly reflected in the Privacy Policy, the Company undertakes to be guided by the norms and provisions of the Federal Law of July 27, 2006 N 152-FZ "On Personal Data".

The Company reserves the right to make any changes to the Policy at any time at its discretion in order to further improve the system of protection against unauthorized access to personal data reported by Users without the consent of

the User. When the Company makes material changes to the Privacy Policy, a notice is posted on the site along with the updated version of the Privacy Policy.