

Personal Data Processing Policy on the website

Moscow

" 08 " April 2026

1. GENERAL PROVISIONS

1.1. This document (hereinafter referred to as the Policy) defines the policy regarding the processing of personal data of users of the site of PLANET 9 LLC (TIN: 7703397289, OGRN: 1157746838810) (hereinafter referred to as the Operator) on the site in the information and telecommunications network of the Internet at: <https://planet9.art/> (hereinafter referred to as the Site) and applies to all information, which the Operator can get about Site Users.

1.2. This Policy is developed on the basis of Clause 2, Part 1, Article 18.1 of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data", as well as Recommendations for drawing up a document defining the operator's policy on personal data processing, in accordance with the procedure established by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data".

1.3. In compliance with the requirements of Part 2 of Article 18.1 of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data", the Policy is published freely in the information and telecommunications network of the Internet on the Operator's Site.

1.4. This Policy applies only to the Site. The Operator does not control and is not responsible for third-party sites to which the User can click on the links available on the Site.

1.5. The terms contained in Article 3 of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" are used in this Policy with the same meaning.

1.6. Planet 9 LLC sets as its most important goal and condition for carrying out its activities the observance of human and civil rights and freedoms when processing their personal data, including the protection of the rights to privacy, personal and family secrets.

1.7. The following terms are also used in this Policy:

User - any person who visits the Site and uses the information, materials and services of the Site. The Site User is a subject of personal data within the meaning of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data".

Site Services - interactive (interactive) software components on the Site pages that are used for integration with information systems and provide Site users with the opportunity to ask questions, write comments and suggestions to the Operator (hereinafter referred to as "Site Services").

Personal data — any information related directly or indirectly to a specific or identifiable User of the Site <https://planet9.ru/>;

Personal data information system — a set of personal data contained in databases and information technologies and technical means that ensure their processing;

Depersonalization of personal data — actions that make it impossible to determine whether personal data belongs to a specific User or other personal data subject without using additional information;

Automated processing of personal data — processing of personal data using computer technology;

Blocking of personal data — temporary termination of processing of personal data (except for cases when processing is necessary to clarify personal data);

Dissemination of personal data — any actions aimed at disclosing personal data to an indefinite group of persons (transfer of personal data) or at making personal data available to an unlimited number of persons, including publishing personal data in the mass media, posting it in information and telecommunications networks, or providing access to personal data in any other way;

Cross-border transfer of personal data — transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity;

Destruction of personal data — any actions, as a result of which personal data is permanently destroyed with the impossibility of further restoration of the content of personal data in the personal data information system and (or) as a result of which the material carriers of personal data are destroyed.

Cookies are a small piece of data that is sent Site the site's server and stored on your device. Cookies contain information about you (for example: language settings, data from forms, etc.).

1.7. Rights and obligations of the Operator.

1.7.1. The Operator must:

- process personal data exclusively for the purposes specified in the Policy, in accordance with the procedure established by the current legislation of the Russian Federation, and take measures necessary and sufficient to ensure the fulfillment of obligations stipulated by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" and regulatory legal acts adopted in accordance with it;

- not to distribute personal data without the User's consent, unless otherwise provided by the current legislation of the Russian Federation;

- process personal data in compliance with the principles and rules provided for by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data";

- organize the protection of personal data in accordance with the requirements of the legislation of the Russian Federation;

- consider requests from the User (their legal representative) regarding the processing of personal data and give reasoned answers;

- provide the User (their legal representative) with the possibility of free access to their personal data;

- take measures to clarify, block, or destroy the User's personal data in cases established by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data".

1.7.2. The Operator has the right to:

- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" and regulatory legal acts adopted in accordance with it, unless otherwise provided by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" or other federal laws. laws;

- entrust the processing of personal data to another person with the User's consent, unless otherwise provided by federal law, on the basis of a contract concluded with this person, including a state or municipal contract, or by adopting a corresponding act by a state body or municipal body;

- if the User withdraws consent to the processing of personal data, continue processing personal data without the User's consent, if there are grounds specified in Federal Law No. 152-FZ of 27.07.2006 "On Personal Data";

- receive reliable information and/or documents containing the User's personal data from the User for the purposes of processing specified in clause 2.2 of the Policy;

- require the User to update the provided personal data in a timely manner.

1.8. Rights and obligations of the User.

1.8.1. The User must:

- ensure the accuracy of the personal data provided to the Operator, which is necessary for the purposes of processing provided for in clause 2.2 of the Policy;

- provide the Operator, if necessary, with information to clarify (update, change) the personal data provided.

1.8.2. The User has the right to:

- full information regarding the processing of his / her personal data by the Operator, with the exception of cases stipulated by the legislation of the Russian Federation;

- clarification of their personal data, their blocking or destruction in cases where the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;

- withdrawal of consent to the processing of personal data;

- taking legal measures to protect their rights;

- appeal to the authorized body for the protection of the rights of personal data subjects or in court against illegal actions or omissions of the Operator when processing their personal data;

The Operator and Users also have other rights and bear other obligations stipulated by the legislation of the Russian Federation.

2. PURPOSES OF PERSONAL DATA PROCESSING

2.1. The processing of personal data is limited to the achievement of specific, pre-defined and legitimate purposes. Processing of personal data that is incompatible with the purposes of personal data collection is not allowed. The personal data processed should not be redundant in relation to the stated purposes of their processing.

Only personal data that meets the purposes of their processing are subject to processing.

2.2. The Operator processes the User's personal data for the following purposes:

2.2.1. Identification of the User for interaction with the User on the topic of questions, suggestions

and comments of the User.

2.2.2. Informing about the operation of the Site(Services), monitoring and improving the quality of the Site (Services).

2.2.3. Providing the User with access to personalized Site resources.

2.2.4. Establishing feedback with the User, including sending notifications, requests regarding the use of the Site, rendering services, performing works, processing requests and requests from the User.

2.2.5. Providing the User with effective customer and technical support in case of problems related to the use of the Site.

2.2.6. Providing the User with information about the Operator's activities.

3. LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

3.1. The legal grounds for processing personal data by the Operator are:

- The Constitution of the Russian Federation;
- The Civil Code of the Russian Federation;
- Federal Law No. 149-FZ of 27.07.2006 "On Information, Information Technologies and Information Protection";
- Federal Law No. 294-FZ of 26.12.2008 "On the Protection of the Rights of Legal Entities and Individual Entrepreneurs in the Exercise of State Control (Supervision) and Municipal Control";
- Decree of the President of the Russian Federation No. 188 of 06.03.1997 "On Approval of the List of Confidential Information";
- Decree of the Government of the Russian Federation No. 1119 of 01.11.2012 "On Approval of Requirements for the Protection of Personal data when Processing them in Personal Data Information Systems";
- FSTEC Order No. 21 of 18.02.2013 "On Approval of the Composition and Content of Organizational and technical measures to ensure the security of personal data when Processing them in Personal Data Information systems";
- consent to the processing of personal data on the Site.

4. SCOPE AND CATEGORIES OF PERSONAL DATA PROCESSED, CATEGORIES OF PERSONAL DATA SUBJECTS

4.1. The Operator may process personal data of the following Users: visitors to the Operator's website.

4.2. Personal data processed by the Operator includes (select the appropriate one):

- The User's last name, first name.
- e-mail address.

- data that is automatically transmitted to the Site Services during their use using the software installed on the User's device, namely: IP address, cookie data, information about the User's browser (or other program that accesses the Services), technical characteristics of the equipment and software used by the User, date and time of access to the Services, addresses of the requested pages, and the history of requests and pageviews on the Site and its Services.

4.3. The Operator ensures that the content and scope of the processed personal data comply with the stated processing purposes provided for in sec. 2 Policies.

4.4. The Operator does not process biometric personal data, special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, or intimate life.

4.5. The following cookies may be collected and processed as part of the Cookie's operation:

Category

- Strictly necessary cookies

These cookies are necessary for the operation of the Site and cannot be disabled in our systems. They are usually set only in response to actions that are equivalent to a request for services, such as setting privacy settings, logging in, or filling out forms. You can configure your browser to block or warn you about these cookies, but some parts of the site will not work. These cookies do not store any personal information.

- Performance cookies

These cookies allow us to count visits and traffic sources so that we can measure and improve Site performance. They help us find out which pages are most and least popular, and see how Users navigate the Site. All information collected by these cookies, is aggregated anonymously. If the User does not allow the use of these cookies, we will not know when you visited the Site and will not be able to track its operation.

- Functional cookies

These cookies allow the Site to provide enhanced functionality and personalization. They can be installed by us or by a third-party provider whose services we have added to our pages. If the User does not allow the use of these cookies, some services may not work properly.

- Target cookies

Targeted cookies can be set through the Site by our partners. They can use them to create a profile of a User's interests based on the browsing information they collect from the User, including the unique identification of the browser and terminal hardware.

4.5.1. It is not allowed to collect and process these categories of cookies without the User's cookie, with the exception of the category "Strictly necessary cookies" due to its necessity for the operation of the Site.

4.5.2. The Site User may at any time revoke the previously given consent to the collection and processing of cookies, except for the category "Strictly necessary cookies" for the previously specified reason, by changing the cookie settings.

5. PROCEDURE AND CONDITIONS FOR PROCESSING PERSONAL DATA

5.1. The Operator processes personal data in accordance with the requirements of the legislation of the Russian Federation in the following ways:

- non-automated processing of personal data;
- automated processing of personal data with or without transmission of the received information via information and telecommunication networks;
- mixed processing of personal data.

5.2. List of actions performed by the Operator with the User's personal data for the purposes stipulated in clause 2.2 of the Policy (select the appropriate one): collection, recording, systematization, accumulation, storage, refinement (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction.

5.3. The processing of personal data is carried out by the Operator subject to obtaining the User's consent (hereinafter referred to as Consent) obtained in accordance with the requirements of Federal Law No. 152 - FZ of 27.07.2006 "On Personal Data", with the exception of cases established by the legislation of the Russian Federation when personal data may be processed without such Consent.

5.4. The User decides to provide his / her personal data and gives Consent freely, voluntarily and in his / her own interest.

5.5. The term of personal data processing is determined by the achievement of the purposes for which personal data was collected, unless another term is provided for by the agreement with the User or the current legislation.

Termination of personal data processing may be conditional on the achievement of the purposes of personal data processing or the loss of the need to achieve these goals, the expiration of the Consent period or the withdrawal of Consent by the User, as well as the identification of illegal processing of personal data.

5.6. Consent may be revoked in the following way: by sending an e-mail notification to the Operator hello@planet9.ru about the intention to withdraw consent with the note "Withdrawal of consent to the processing of personal data". If the User does not specify the above marks, the risk of non-receipt of the notification by the Operator passes to the User, i.e. The Operator is not responsible for failure to perform the actions specified in such notification.

5.7. The Operator distributes personal data authorized by the User for distribution, that is, performs actions aimed at their disclosure to an indefinite circle of persons, in compliance with the requirements, prohibitions and conditions established by Part 9 of Article 9, Article 10.1 of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data". It is not allowed to disclose or distribute personal data to third parties without the User's consent, unless otherwise provided by federal law. Consent to the processing of personal data authorized by the User for distribution is issued separately from other User consents to the processing of his personal data, taking into account the Requirements for the content of consent to the processing of personal data authorized by the subject of personal data for distribution, approved by Roskomnadzor Order No. 18 of 24.02.2021.

5.8. When processing personal data, the Operator takes or ensures the adoption of the necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access to it, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions in relation to personal data.

5.8.1. Ensuring the security of personal data is achieved, in particular:

- 1) Identification of threats to the security of personal data when processing them in personal data information systems;
- 2) Applying organizational and technical measures to ensure the security of personal data when processing them in personal data information systems necessary to meet the requirements for personal data protection, the implementation of which ensures the levels of personal data security established by the Government of the Russian Federation;
- 3) Application of information security tools that have passed the conformity assessment procedure in accordance with the established procedure;
- 4) Assessment of the effectiveness of measures taken to ensure the security of personal data prior to commissioning of the personal data information system.
- 5) Taking into account machine-generated personal data carriers;
- 6) Detection of unauthorized access to personal data and taking measures;
- 7) Restoration of personal data modified or destroyed as a result of unauthorized access to them;
- 8) Establishing rules for access to personal data processed in the personal data information system, as well as ensuring registration and accounting of all actions performed with personal data in the personal data information system;
- 9) Training of the Operator's personnel involved in the processing of personal data on ensuring the security of personal data;
- 10) Control over the measures taken to ensure the security of personal data and the level of security of personal data information systems.

5.9. Storage of personal data is carried out in a form that allows you to identify the User, for a period not longer than the purposes of processing personal data require, except in cases where the period of storage of personal data is established by federal law, an agreement поручителем to which the User is a party, beneficiary or guarantor.

5.10. When processing personal data, the Operator complies with the requirements of Article 18 of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data".

5.11. When processing personal data, the Operator undertakes to respect the confidentiality of personal data.

5.12. The Operator does not transfer personal data across borders.

5.13. In case of illegal or accidental transfer (provision, distribution, access) of personal data, the Operator informs the User about this within ten working days.

5.14. The Operator, together with the User, takes all necessary measures to prevent losses or other negative consequences caused by illegal or accidental transfer (provision, distribution, access) of the User's personal data.

6. BLOCK, REFINE, AND DESTROY PERSONAL DATA. RESPONSES TO USER REQUESTS RIGHT TO ACCESS PERSONAL DATA

6.1. In case of detection of illegal processing of personal data at the request of the User (his representative) or at the request of the User (his representative) or the authorized body for the protection of the rights of personal data subjects, the Operator blocks the unlawfully processed personal data related to the relevant User, or ensures their blocking from the moment of such request or receipt of the specified request of the User on verification period.

In case of detection of inaccurate personal data when contacting the User or his representative, or at their request or at the request of the authorized body for the protection of the rights of personal data subjects, the Operator blocks personal data related to this User, or ensures their blocking from the moment of such request or receipt of the specified request for the verification period, rights and legitimate interests of the User or third parties.

6.2. If the fact of inaccuracy of personal data is confirmed, the Operator, on the basis of information provided by the User (his representative) or the authorized body for the protection of the rights of personal data subjects, or other necessary documents, clarifies the personal data or ensures their clarification within seven working days from the date of submission of such information.

6.3. If illegal processing of personal data is detected, the Operator shall terminate the illegal processing of personal data or ensure the termination of the illegal processing of personal data within a period not exceeding three working days from the date of such detection, and if it is impossible to ensure the legality of personal data processing, within a period not exceeding ten working days from the date of detection of the illegal processing of personal data. processing of personal data, destroys such personal data or ensures their destruction.

6.4. If the purpose of personal data processing is achieved, the Operator destroys the personal data or ensures their destruction within a period not exceeding thirty days from the date of achievement of the purpose of personal data processing, unless otherwise provided by the contract to which the User is a party, beneficiary or guarantor, another agreement between the Operator and the User, or if the Operator process personal data without the User's consent on the grounds provided for by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" or other federal laws.

6.5. If the User withdraws consent to the processing of their personal data and if the storage of personal data is no longer required for the purposes of personal data processing, the Operator destroys the personal data or ensures their destruction within a period not exceeding thirty days from the date of receipt of the said withdrawal, unless otherwise provided by the agreement to which the beneficiary or the User is a guarantor, by another agreement between the Operator and the User, or if the Operator does not have the right to process personal data without the User's consent on the grounds provided for by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" or other federal laws.

6.6. Within a period not exceeding seven working days from the date of submission by the User (his representative) of information confirming that such personal data is illegally obtained or is not necessary for the stated purpose of processing, the Operator destroys such personal data.

6.7. The processed personal data is subject to destruction if it is no longer necessary to achieve the purposes of processing, unless otherwise provided by federal law.

7. LIABILITY OF THE PARTIES

7.1. The Operator is responsible for violating the requirements of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" in accordance with the legislation of the Russian Federation.

7.2. The User has the right to demand compensation for damages or compensation for non-pecuniary damage in court.

Moral damage caused to the User as a result of violation of his rights, violation of the rules for processing personal data, as well as requirements for the protection of personal data established in accordance with Federal Law No. 152-FZ of 27.07.2006 "On Personal Data", as well as the provisions of the Policy, is subject to compensation in accordance with the legislation of the Russian Federation. Compensation for non-pecuniary damage is carried out independently of compensation for property damage and losses incurred by the User.

8. DISPUTE RESOLUTION

8.1. In case of disputes and / or disagreements arising from the relationship between the User and the Operator, such issues are resolved in accordance with the current legislation of the Russian Federation.

8.2. In case of disputes, the pre-trial procedure for their settlement is mandatory. Claims are considered within 10 (ten) business days from the date of their receipt. If the dispute is not resolved, it is subject to consideration in the competent court at the location of the Operator.

8.3. The current legislation of the Russian Federation applies to the Policy and relations between the User and the Operator.

9. FINAL PROVISIONS

9.1. The Operator has the right to make changes to the Policy without the User's consent.

9.2. The new version of the Policy comes into force from the moment it is posted on the Site, unless otherwise provided by the new version of the Policy.

The new version of the Policy applies to relationships that have arisen since its introduction.

9.3. All suggestions or questions about the Policy should be sent to the following email address: hello@planet9.ru.

9.4. The User can also send an email to the Operator at the following address: Moscow, ext.ter.g. Presnensky Municipal District, Bolshaya Nikitskaya str., 31, floor 4, office 1, office 3,4,5,6,7,8,9

9.5. The current version of the Policy is freely available on the Internet at https://planet9.art/docs/personal_data.pdf.