

# Policy for Personal Data Processing on <https://fusionbrain.ai>

## 1. General Provisions

1.1. This Personal Data Processing Policy (the Policy) of Artificial Intelligence Institute Non-Commercial Organization, located at (location): Suite 4.B.08, Building 1, 32 Kutuzovsky Avenue, Moscow, 121170 (the Operator, Company) is an official document outlining general principles, objectives and procedure for processing personal data on the web-site named <https://fusionbrain.ai> (the Website), as well as personal data protection means in use.

1.2. This Policy has been worked out in compliance with applicable Russian law on personal data protection.

1.3. This Policy shall be solely applicable to the Website. The Operator shall not supervise or be liable for the websites of third parties which the User can access via links available at the Website.

1.4. Processing of personal data belonging to Personal Data Subjects from other categories by the Operator shall be regulated by other by-laws of the Operator.

1.5. This Policy shall become effective from the time it is approved and shall remain in force indefinitely until it is replaced by a new Policy.

## 2. Basic Terms and Definitions

2.1. The following terms shall be referenced in the Policy:

**Personal data processing** shall mean any action (operation) or a set of actions (operations) performed in relation to personal data with or without automated means, including collection, logging, systematization, accumulation, storage, clarification (update, modification), retrieval, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion, and destruction of personal data.

**Personal data destruction** shall mean actions that result in impossibility of restoring the personal data content in the Personal Data Information System and/or in destruction of the Tangible Media of Personal Data.

**Personal Data Operator (the Operator)** shall mean a governmental authority, municipal authority, legal entity or an individual who independently or jointly with other persons arranges for and/or performs personal data processing, and determines the purposes of personal data processing, composition of personal data subject to processing, and actions (operations) to be performed with personal data.

**Personal Data Subject** shall mean an individual, Russian Federation national who is entitled for the protection of their rights and freedoms in the course of personal data processing, and protection of privacy, personal and family secrets.

**Personal data** shall mean any information relating to an individual identified or identifiable directly or indirectly (the Personal Data Subject.)

**Website User** shall mean any individual browsing the website and using its data, content and services.

**Website** shall mean a set of interconnected web pages accessible through Internet at a unique address (URL), as well as its sub-domains.

**Cookie** shall mean small blocks of data created by a web server while a user is browsing a website and placed on the user's computer. A web client or web browser send those blocks to a web server in an HTTP request each time a corresponding web page is opened.

**IP address** shall mean a unique network address of a node in a computer network used by the User to access the website.

**PDIS** shall mean the Personal Data Information System.

### **3. Legal Basis for Personal Data Processing**

3.1. The legal basis for personal data processing by the Operator shall include:

- Civil Code of the Russian Federation (CC) (Part 1) dated November 30, 1994 No. 51-FZ
- CC (Part 2) dated January 26, 1996 No. 14-FZ
- CC (Part 3) dated November 26, 2001 No. 146-FZ
- CC (Part 4) dated December 18, 2006 No. 230-FZ
- Terms of use (hyperlink: <https://fusionbrain.ai/static/fusion/docs/agreement.pdf>) placed on the Operator's website and accepted by the Personal Data Subject when using the website
- by-laws of the Operator
- federal laws and other regulatory acts applicable to personal data protection
- Users' consent for personal data processing and processing of personal data permitted for distribution.

### **4. Objectives of Personal Data Processing, Categories and List of Personal Data to be Processed, Categories of Personal Data Subjects, Methods and Terms of Data Processing**

4.1. The objectives of the personal data processing by the Operator shall include:

4.1.1. Signing up on the website:

Categories of personal data to be processed: publicly available personal data and other personal data.

The following list of personal data to be processed includes: E-mail, Data on User's location, Type, version, and language of the operating system and browser, Type of device and screen resolution, Pages opened by the User, IP address, Hash ID of the User, Time when a web-page was browsed, URL, HTTP referrer, User Agent, HTTP Cookie.

Categories of the personal data subjects: website users.

Methods of personal data processing: automated method.

Data processing and storage term: until the purpose of personal data processing is achieved or until the consent for personal data processing is withdrawn.

Personal data destruction procedure is given in section 4.2.

4.1.2. Data exchange with users (including sending information messages, processing of incoming queries, information materials of any type and response thereto.)

Categories of personal data to be processed: publicly available personal data and other personal data.

The following list of personal data to be processed includes: E-mail, Data on User's location, Type, version, and language of the operating system and browser, Type of device and screen resolution, Pages opened by the User, IP address, Hash ID of the User, Time when a web-page was browsed, URL, HTTP referrer, User Agent, HTTP Cookie.

Categories of the personal data subjects: website users.

Methods of personal data processing: automated method.

Data processing and storage term: until the purpose of personal data processing is achieved or until the consent for personal data processing is withdrawn.

Personal data destruction procedure is given in section 4.2.

#### 4.1.3. Subscription to marketing/ads news-letters

Categories of personal data to be processed: other personal data.

A list of the personal data to be processed: E-mail.

Categories of the personal data subjects: website users.

Methods of personal data processing: automated method.

Data processing and storage term: until the purpose of personal data processing is achieved or until the consent for personal data processing is withdrawn.

Personal data destruction procedure is given in section 4.2.

4.1.4. Collecting statistics and analysis of the website operation including software placed on the website, website performance improvement, and website adaptation to the users' needs, preferences and interests.

Categories of personal data to be processed: publicly available personal data and other personal data.

The following list of personal data to be processed includes: E-mail, Data on User's location, Type, version, and language of the operating system and browser, Type of device and screen resolution, Pages opened by the User, IP address, Hash ID of the User, Time when a web-page was browsed, URL, HTTP referrer, User Agent, HTTP Cookie.

Categories of the personal data subjects: website users.

Methods of personal data processing: automated method.

Data processing and storage term: until the purpose of personal data processing is achieved or until the consent for personal data processing is withdrawn.

Personal data destruction procedure is given in section 4.2.

#### 4.1.5. Arrangement of marketing/ads events, statistical and analytical polls and surveys

Categories of personal data to be processed: publicly available personal data and other personal data.

The following list of personal data to be processed includes: E-mail, Data on User's location, Type, version, and language of the operating system and browser, Type of device and screen

resolution, Pages opened by the User, IP address, Hash ID of the User, Time when a web-page was browsed, URL, HTTP referrer, User Agent, HTTP Cookie.

Categories of the personal data subjects: website users.

Methods of personal data processing: automated method.

Data processing and storage term: until the purpose of personal data processing is achieved or until the consent for personal data processing is withdrawn.

Personal data destruction procedure is given in section 4.2.

4.1.6. Marketing/advertising activities in the form of monitoring the behavior of the target audience, enrichment of data thereon (including data segmentation and scoring) and targeting such audience, including by demonstration of personalized and non-personalized ads.

Categories of personal data to be processed: publicly available personal data and other personal data.

The following list of personal data to be processed includes: E-mail, Data on User's location, Type, version, and language of the operating system and browser, Type of device and screen resolution, Pages opened by the User, IP address, Hash ID of the User, Time when a web-page was browsed, URL, HTTP referrer, User Agent, HTTP Cookie.

Categories of the personal data subjects: website users.

Methods of personal data processing: automated method.

Data processing and storage term: until the purpose of personal data processing is achieved or until the consent for personal data processing is withdrawn.

Personal data destruction procedure is given in section 4.2.

#### 4.2. Data Destruction and Destruction Procedure:

4.2.1. The Operator shall cease processing personal data, destroy personal data storage media and delete personal data from information systems in the following cases:

- the objective of personal data processing has been achieved or maximum storage term expired: to be done within 30 days
- no further need to pursue personal data processing objective: to be done within 30 days
- provision of information by the Personal Data Subject or their duly authorized representative confirming that the personal data have been received illegally and shall not be required for the stated objective: to be done within 7 days
- failure to ensure the legitimacy of the personal data processing: to be done within 10 days
- withdrawal by a Personal Data Subject of their consent for personal data processing: to be done within 30 days
- expired limitation period for the legal relations which imply or implied personal data processing.

4.2.2. As per Art. 21, Part 5 of Federal Law No.152-FZ 'On Personal Data' dated July 27, 2006, the Operator shall not cease personal data processing or destroy the same in the following cases:

- set by an agreement otherwise the Personal Data Subject is a party thereto

- the Operator may process personal data pending a consent of a Personal Data Subject basing on the grounds set forth in Russian law
- the terms for processing personal data of the Personal Data Subject set forth in Russian law have not expired yet.

4.2.3. Personal data processed by automated methods shall be destructed by a Commission for personal data processing including employees working for the Operator and formed by a relevant order. Personal data shall be destroyed by the operating system means and /or data base management systems. The documents confirming the destruction of personal data of Personal Data Subjects processed by automated means shall be a personal data destruction report and data exported from the event log in the Personal Data Information System.

4.2.4. The personal data destruction report and data exported from the event log shall be stored for 3 years from the date of personal data destruction.

## **5. Use of Cookies**

5.1. For the statistical purpose and analysis of the Website operation, the Operator shall process personal data of the Website Users with the help of Cookies, where it is allowed by the browser settings of the User (Saving Cookies enabled). The following personal data of the Website Users shall be processed:

- User Agent of the User (type of device (e.g. tablet, laptop, smartphone), make and model, type of the operating system, and type of browser)
- Country, city, populated locality, urban or rural district (based on User's IP)
- Location (if the settings of the User's device and browser allow for location tracking)
- Website navigation history of the User.

5.2. The data processing term shall depend upon the type of Cookies. This information shall be given in the Cookie Usage Rules accessible at <https://fusionbrain.ai/static/fusion/docs/personal.pdf>.

5.3. If the User rejects processing Cookies, the User shall stop using the Website or disable using Cookies in their browser settings. With that, certain Website functions can become unavailable.

## **6. Personal Data Processing Procedure and Conditions**

6.1. The Operator shall process personal data as per the requirements of Russian law.

6.2. Personal data shall be processed with consent of Personal Data Subjects for personal data processing as well as without such consent as set forth in Russian law.

6.2.1. The Operator shall process User's personal data only in case they are filled and sent by the User via special forms which can be accessed at <https://fusionbrain.ai> or emailed to the Operator. By filling the relevant forms and/or sending their personal data to the Operator, the User shall agree with this Policy.

6.2.2. A Personal Data Subject shall independently decide on the provision of their personal data and freely provide their consent following their own will and interests.

6.3. The consent for processing of personal data allowed for distribution by a Personal Data Subject shall be complied separately from other consents from the Personal Data Subject for their personal data processing.

6.4. The consent for processing personal data allowed for distribution from the Personal Data Subject can be submitted to the Operator:

- directly
- via an information system of a duly authorized authority for the protection of Personal Data Subjects' rights.

6.5. The Operator shall process personal data with the use of automation tools.

6.6. Personal data shall be processed by employees working for the Operator duly authorized for personal data processing.

6.7. Personal data processing shall include:

- receipt of personal data in a written form upon a consent of a Personal Data Subject for personal data processing and distribution
- personal data logged, registered and put in data systems of the Operator
- and other means of personal data processing.

6.8. The Operator shall do the following in terms of personal data: collect, log, systemize, accumulate, store, clarify (update, modify), retrieve, use, transfer (provide, access), block, delete, and destroy.

6.9. The personal data of Personal Data Subjects which are processed with the use of automation tools with various purposes shall be stored in different folders.

6.10. Documents containing personal data may not be stored or allocated in public electronic catalogues (file-sharing services) in PDIS.

6.11. Personal data shall be stored in the form which allows users to identify the Personal Data Subject within the time prescribed by the personal data processing objective.

6.12. No processing of biometric personal data and special categories of personal data regarding race, ethnic origin, political views, religion, philosophy, state of health, and intimacy is accomplished on the Website.

6.13. The Operator shall not process personal data with the political agitation purpose.

6.14. The Operator shall process personal data received via the Website with the use of data bases which are located in the Russian Federation.

6.15. The Operator shall not check the validity of information submitted by the User and shall assume the User submits reliable and complete information and ensures its relevance.

6.16. In case of inaccurate data processing or improper processing, the data shall be updated or blocked, respectively.

6.17. The term for the personal data processing shall be limited by the time the personal data processing objectives are achieved. The User may at any time withdraw their consent for personal data processing by sending a relevant notice to the e-mail of the Operator with its subject saying "Withdrawal of Consent for Personal Data Processing."

## **7. Personal Data Transfer to Third Parties**

7.1. In order to achieve the personal data processing objectives set forth in sections 4 and 5 herein, the Operator may transfer personal data to third parties, namely:

- Cloud technology Limited (Ltd.), located at: 23 Vavilova Street, Moscow, Russian Federation, 117312.

7.2. Personal data shall be transferred to the abovementioned party basing on provisions of a relevant contract (offer), consent for personal data processing and under an agreement (mandate/transfer agreement) to be executed with such a party.

7.3. The parties entitled for personal data processing by such an agreement (mandate/transfer agreement) shall act in compliance with the principles and rules set for personal data processing in Federal Law No. 152-FZ. Such an agreement shall include a list of personal data to be processed by such a party, a set of actions (operations) in respect of such personal data which shall be performed by the party in charge of personal data processing, objectives of personal data processing and obligations of such a party for keeping personal data confidential and secure in the course of data processing, as well as requirements for the protection of the personal data subject to processing as per Federal Law No. 152-FZ.

7.4. The Operator may transfer personal data to inquiry and investigation agencies and other duly authorized institutions on the grounds set forth in applicable Russian law.

## **8. Measures to Ensure Personal Data Confidentiality and Security in the Course of Data Processing**

8.1. The security of personal data processed by the Operator shall be ensured by the use of relevant legal, organizational, technical and software tools required and sufficient for the compliance with applicable Russian law.

8.2. The Operator shall take the following measures to protect personal data:

- appoint specialists in charge of the arrangement and security of personal data processing
- make a list of specialists who may access personal data
- develop and approve documented procedures for determination of a personal data processing sequence
- determine the security level of personal data when processed in the Personal Data Information Systems
- assign user rights for access to personal data to be processed in the Personal Data Information Systems and ensure logging and accounting of all actions performed with the personal data
- restrict access to the premises housing key hardware and software and Personal Data Information Systems
- provide for backing up and restoration of Personal Data Information Systems and personal data modified or destructed via unauthorized access
- set password complexity requirements to access Personal Data Information Systems
- ensure antivirus monitoring and protection of corporate networks from malware (software viruses) and software bugs
- timely update software used in Personal Data Information Systems and data protection tools
- regularly arrange and conduct performance assessment of the activities which are performed to ensure personal data protection
- reveal unauthorized access to personal data and take measures to determine the root causes and eliminate possible consequences
- manage the measures taken to ensure personal data protection and security level of the Personal Data Information System.

## **9. Rights and Obligations of the Personal Data Subjects**

9.1. The Website user may receive information regarding processing of its personal data, unless set forth by federal laws, including information containing the following:

- confirmation of personal data processing by the Operator
- legal basis and objectives for personal data processing
- objectives and methods of personal data processing used by the Operator
- name and location of the Operator, data on parties (except for the Operator's employees) who may access personal data or personal data can be disclosed to under an agreement with the Operator or basing on the federal law
- personal data processed in relation to the relevant Personal Data Subject and the source such data has been received from, unless any other submission procedure is set forth by the federal law
- terms for personal data processing including data storage time
- procedure for exercising the rights set forth in the Federal Law 'On Personal Data' by the Personal Data Subject
- information regarding the completed or assumed trans-border transfer of personal data
- official name or full name (last name, first name and patronymic name) and address of the party or individual in charge of the personal data processing under the instructions of the Operator in case personal data processing has been or will be delegated to such a party or an individual
- and other data set forth by the Federal Law 'On Personal Data' or other federal laws.

9.2. The Website Users may request that the Operator updates their personal data, blocks or destroys the data in case the personal data are incomplete, outdated, inaccurate, illegally obtained or not required for the stated purpose of data processing, and shall take measures provided by law to protect their rights.

9.3. The Website User may request a list of their personal data in a structured, unified and machine-readable format submitted to the Operator for processing and may authorize the Operator to transfer their personal data to a third party where technically possible. If this is the case, the Operator shall not be liable for further actions of such a third party in relation to personal data.

9.4. The Website User shall submit to the Operator accurate personal data and advise about clarification (update, modification) of their personal data.

9.5. Any questions arising in respect of personal data processing shall be emailed to: [privacy@airi.net](mailto:privacy@airi.net).

## **10. Final Provisions**

10.1. This Policy shall be made publicly available and accessible at <https://fusionbrain.ai>.

10.2. The Operator may unilaterally modify the Policy in the following cases:

- changes in Russian law on personal data processing and protection
- receipt of instructions for elimination of non-conformances interfering with the application of the Policy
- upon a decision made by the Company's executives
- changes in the personal data processing objectives
- necessary changes to the personal data processing procedure connected to the Operator's activities.

10.3. A person in charge of personal data processing shall be responsible for checking compliance with the requirements of the Policy.



10.4. People violating the personal data processing and protection regulations shall be held liable as per the procedure set forth by Russian law.

# Cookies Policy for fusionbrain.ai

This Cookies Policy (the Policy) shall describe how Artificial Intelligence Institute Non-Commercial Organization and/or a third party authorized to process your personal data pursuant to the Policy for Personal Data Processing on Website <https://fusionbrain.ai> accessible at <https://fusionbrain.ai/static/fusion/docs/personal.pdf> shall use cookies for browsing fusionbrain.ai (the site, website, our site, this site.)

By pressing the Agree button and continuing to use this site, you consent to processing of your Cookies. You may also refuse processing of Cookies, although such denial can impact the correct using of our site.

## What is a Cookie?

Cookies are small blocks of data created by a web server while you are browsing a website with a browser installed on your computer or mobile device. Cookies reflect your preferences or actions taken on a website, as well as track user's equipment, data and time of their session. Cookies are placed on your computer or mobile device by your web browser. If you wish, you can delete the saved Cookies using your browser settings.

## Which types of Cookies do we use?

- Session Cookies

They exist in scratchpad RAM only for a period the User is browsing the website page. Browsers usually delete session Cookies once the User closes a website tab. Session Cookies enable the website to remember the choices made at the previous site to avoid having to re-enter the data.

- Persistent Cookies

These are Cookies that are placed by a browser on the User's computer and are not deleted once the browser is closed. Persistent Cookies can preserve user settings for a specific website enabling the use of such preferences for future browsing sessions.

Such Cookies enable identification of a User as a unique user of the website and help to recall information about the User and actions previously taken by such a User when returning to the website.

- Statistical Cookies

Such Cookies include information on the way the User uses the website. For instance, which pages such a User visits and which links they follow. The main purpose of such Cookies is making site functioning better.

- Essential cookies

A minimum set of Cookies required for correct operation of the site.

## How do we use your Cookies?

Cookies shall be used for the following:

- Improve site quality
- Show the information of higher priority
- Save settings

- Analyze statistical data on using a site.

### **How do we process your Cookies?**

Our site processes the data it obtains. The obtained data are handled to develop the most useful functions, make statistical and marketing surveys, remedy errors and test new functions.

### **How much does it take to process Cookies?**

Your Cookies shall be processed according to the abovementioned purposes of processing and shall be erased once the purpose is achieved or if no need exists any more to achieve such a purpose.

### **How shall I refuse processing of Cookies?**

You may refuse processing of your Cookies in your browser settings. If this is the case, our site will only use the Cookies strictly required for browsing the site and services offered.

### **What shall I do if I have any questions?**

Shall you have any questions related to processing of your personal data or exercising rights of a personal data subject, please contact us using one of the methods below:

E-mail: [privacy@airi.net](mailto:privacy@airi.net)

It takes Ten (10) business days to respond to your queries (queries of personal data subjects) once you email.