

APPROVED BY:**President**

of the Foundation for the Support of Anti-Cancer Organizations
 "Together Against Cancer"
 _____ (B.Sh. Kamolov)

March 1, 2021

*Revised on June 1, 2021**Revised on August 25, 2021***L.S.****PRIVACY POLICY****of the Foundation for the Support of Anti-Cancer Organizations "Together Against Cancer"**

This Privacy Policy (hereinafter referred to as the Policy) defines the policy regarding the processing of personal data, contains information about the implemented requirements for the protection of personal data of the Operator.

1. TERMS AND DEFINITIONS

- 1.1. User** means an individual using the site of the "Together Against Cancer" Foundation for the Support of Anti-Cancer Organizations <https://protiv-raka.ru/> (hereinafter referred to as the site), ONCOTODAY project, represented by the ONCOTODAY mobile application (hereinafter – the mobile app) and the website <http://web.oncotoday.pro/> (hereinafter – the website).
- 1.2. Operator** means the Foundation for the Support of Anti-Cancer Organizations "Together Against Cancer", OGRN (Primary State Registration Number) 1097799007492, location address: 11, Ordzhonikidze Str., Bld. 11, prem. IV, room 2, Donskoy Intracity Municipality, 115419, Moscow (hereinafter – Operator or Foundation).
- 1.3. Cookies** means a piece of data in a HTTP request intended for storage on the User's terminal device and used by the Operator to authenticate the user, store personal preferences and user settings, track the status of the user's access session, and maintain statistics about the Users.
- 1.4. Registration Data** means a list of information specified by the Operator when registering on the site, in the mobile application and/or on the website, and in the future when they are changed during the execution of the contract.
- 1.5. ONCOTODAY Project** means a digital reference project on oncology for healthcare professionals involved in providing care to patients with malignant tumors. The ONCOTODAY Project is aimed at improving the medical, scientific, practical and legal knowledge of professionals working in the field of oncology. The ONCOTODAY Project is presented in two versions: mobile (ONCOTODAY mobile application) and desktop (website <http://web.oncotoday.pro/>). The mobile version is intended for use on mobile devices (phones) and tablets, while the desktop version is intended for use on PCs. The ONCOTODAY mobile application is available on the Android and iOS operating systems, which can be installed by downloading the application from Google Play and App Store, respectively. The website is available at <http://web.oncotoday.pro/>.
- 1.6. Depersonalization of Personal Data** means actions that make it impossible to determine the ownership of personal data to a specific personal data subject without using additional information.
- 1.7. Personal Data Processing** means any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including the collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data.

2. GENERAL PROVISIONS

- 2.1. The Policy regulates the processing of personal data in the course of the operator's business activities, including the granting of the right to use the site <https://protiv-raka.ru/>, the ONCOTODAY mobile application and/or the website <http://web.oncotoday.pro/> to Users.
- 2.2. The Policy is developed in accordance with the requirements of:
 - Constitution of the Russian Federation;
 - Labor Code of the Russian Federation;
 - Federal Law of the Russian Federation No. 152-FZ dated July 27, 2006 "On Personal Data";
 - Contracts concluded by the Operator;
 - Other regulatory documents, taking into account the current requirements in the field of personal data protection.
- 2.3. The User is responsible for providing accurate personal data. The agreements concluded with the User provide that the Operator has the right, but is not obliged to request copies of documents confirming the provided personal data.
- 2.4. This Policy applies to personal data received both before and after the entry into force of this Policy.
- 2.5. This Policy is published on the Operator's site at <https://protiv-raka.ru/>, on the Operator's website at <http://oncotoday.pro/>, in the mobile application in the registration form and the "Menu" section (the "About the App" subsection), in App Store and Google Play application stores, as well as at <http://web.oncotoday.pro/>.

3. CATEGORIES OF PERSONAL DATA SUBJECTS

- 3.1. The Operator processes the personal data of the following categories of personal data subjects:
 - 3.1.1. Employees of the Operator, dismissed employees, candidates for filling vacant positions;
 - 3.1.2. Users;
 - 3.1.3. Representatives of the Operator's counterparties.

4. PURPOSES AND GROUNDS FOR PROCESSING PERSONAL DATA

- 4.1. Personal data of employees, dismissed employees, candidates for vacant positions of the Operator are processed in accordance with subclause 2 of Clause 1 of Article 6 of Federal Law No. 152-FZ dated 27.07.2006 "On Personal Data", as well as the Labor Code of the Russian Federation in order to comply with the provisions of the employment contract, the Labor Code of the Russian Federation, as well as related regulatory legal acts.
- 4.2. Personal data of the Users regarding the use of the site, the mobile application and/or the website is processed in accordance with subclause 5 of Clause 1 of Article 6 of Federal Law dated 27.07.2006 No. 152-FZ "On Personal Data" for the purpose of concluding and executing the User Agreement for the use of the protiv-raka.ru site, the User Agreement on the use of the mobile application and the ONCOTODAY website, as well as for the following purposes:
 - identification of the User when entering the site, mobile application and/or the website; compliance with the requirements established by the legislation of the Russian Federation; marketing, information and advertising mailings;
 - the User's participation as a listener in events organized by the Foundation (round tables, conferences, symposia, lectures, etc.);
 - identification of the User when logging into the mobile application and/or the website via the social networks Facebook and Vkontakte;

- conducting statistical research;
 - proper functioning of the site, mobile application and/or the website, elimination of technical and/or other malfunctions in the operation of the site, application and/or the website; improvement of the quality of functioning of the site, mobile application and/or the website, ease of use of the site, mobile application and/or the website; providing access to the User to certain functionality (services) of the site, the mobile application and/or the website;
 - authentication of the User of the site, website, including storing personal preferences and settings, tracking the status of the access session, maintaining statistics regarding Users of the site, website;
 - for other purposes with the consent of the User.
- 4.3. Personal data of representatives of counterparties is processed in accordance with subclause 5 of Clause 1 of Article 6 of Federal Law No. 152-FZ dated 27.07.2006 "On Personal Data" for the purpose of concluding and executing the contract concluded between the counterparty and the Operator.
- 4.4. Personal data may be used for other purposes, if this is mandatory in accordance with the provisions of the legislation of the Russian Federation.
- 4.5. The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. The processing of personal data that is incompatible with the purposes of collecting personal data is not allowed.

5. COMPOSITION OF USER INFORMATION

- 5.1. The Operator processes the following personal data of the Users:
- for the purposes of concluding and executing the user agreement on the use of the ONCOTODAY mobile application and website; identifying the User when entering the mobile application and/or the website; complying with the requirements established by the legislation of the Russian Federation; marketing, information and advertising mailings: *last name, first name, patronymic (if any), email, phone number, date of birth, profession/specialization, position.*
 - for the purposes of entering into and executing a User Agreement for the use of the site; identification of the Subject when entering the site (authorization); participation as a listener in events held by the Foundation; compliance with the requirements established by Russian legislation; marketing, information and advertising mailings: *last name, first name, middle name (if any), email address, telephone number, date of birth, specialty, position.*
 - for the purposes of identifying the User when entering the mobile application and/or the website through the social networks Facebook and Vkontakte: for Facebook: *ID, firstName, last_name, email;* for Vkontakte: *ID, firstName, lastName, email.*
 - for the purpose of conducting statistical research: *country, city, place of work.*
 - for the purposes of proper functioning of the mobile application and/or the website, eliminating technical and/or other malfunctions in the operation of the application and/or the website; improving the quality of functioning of the mobile application and/or the website, ease of use; providing the User with access to certain functionality (services) of the mobile application and/or the website: *operating system, IP address, APPLICATION_ID, application version, access time, browser information.*
 - for the purposes of the proper functioning of the site, eliminating technical and (or) other malfunctions in the operation of the site; improving the quality of the site, the convenience of use; providing access to the User to the individual functionalities (services) of the site: *operating system, IP address, access time, information about the browser.*

- for the purposes of authenticating the Users of the site, of the website, including storing personal preferences and settings, tracking the status of the access session, and maintaining statistics regarding users of the site, website: *data from cookies*.
- The User also has the right to provide other data, namely: *photos and other profile data, as well as other data in agreement with the User and necessary to resolve the User's issues, depending on the circumstances*.

5.2. The term of storage of personal data is determined by the contract or the purpose of providing consent to the processing.

6. SPECIAL CATEGORIES OF PERSONAL DATA

6.1. The Operator does not process special personal data.

7. RIGHTS OF THE SUBJECT

7.1. The Subject of personal data has the right to:

- 7.1.1. Independently make changes to the provided personal data, and delete them;
- 7.1.2. Require notification of all persons who have previously been informed of incorrect or incomplete personal data;
- 7.1.3. Receive from the Operator any information concerning the processing of its personal data within the scope of the Operator's authority.

8. INFORMATION ON THE IMPLEMENTED REQUIREMENTS FOR THE PROTECTION OF PERSONAL DATA

8.1. When processing personal data, the Operator takes the necessary legal, organizational and technical measures and ensures that they are taken to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions with respect to personal data, which are, in particular (but not limited to):

- 8.1.1. Appointment of the person responsible for the processing of personal data;
- 8.1.2. Restriction of the number of employees who have access to personal data;
- 8.1.3. Implementation of anti-virus control and other measures of protection against malicious software and mathematical impact;
- 8.1.4. Use of information backup and recovery tools;
- 8.1.5. Update the software if there are security patches from the manufacturers;
- 8.1.6. Implementation of encryption when transferring personal data on the Internet;
- 8.1.7. Adoption of measures related to the admission of appropriate persons only in the places of installation of technical means;
- 8.1.8. Use of technical means of protection of premises in which the technical means of personal data information systems are located, and places of storage of material carriers of personal data.

9. CONFIDENTIALITY

9.1. The Operator and other persons who have obtained access to personal data are obliged not to disclose or distribute personal data to third parties without observing the principle based on the consent of the personal data subject, except in cases provided for by applicable law.

10. DESTRUCTION (DEPERSONALIZATION) OF PERSONAL DATA

- 10.1.** The destruction (depersonalization) of personal data is performed in the following cases:
- 10.1.1. upon reaching the purposes of their processing or in case of loss of the need to achieve them within a period not exceeding thirty days from the moment of achieving the purpose of personal data processing, unless otherwise provided for by the contract to which the personal data subject is a party, or by another agreement between the Operator and the personal data subject (its representative, employer);
 - 10.1.2. in the case of detection of illegal processing of personal data or lawful revocation of personal data within a period not exceeding ten working days from the moment of detection of such a case;
 - 10.1.3. in the case of the expiration of the period of storage of personal data, determined in accordance with the legislation of the Russian Federation and the organizational and administrative documents of the Operator;
 - 10.1.4. in the case of an order of the authorized body for the protection of the rights of personal data subjects, the Prosecutor's Office of Russia or a court decision.
- 10.2.** The withdrawal of the Users' personal data is carried out in writing by sending an application by e-mail to the Operator.

11. TRANSFER AND ASSIGNMENT TO THIRD PARTIES

- 11.1. The Operator does not process personal data across borders. When storing personal data, the Operator uses databases located on the territory of the Russian Federation. The personal data of the Subjects of personal data is stored exclusively on electronic media.
- 11.2. The Operator may transfer personal data to other persons, such as payment agents, hosting providers, and other persons for the purpose of fulfilling the contract concluded with the User.
- 11.3. The Operator guarantees the conclusion of an adequate order for the processing of personal data in the event of involvement of third parties in accordance with the contractual authority of the Operator.
- 11.4. The Operator has the right to transfer personal data to the bodies of inquiry and investigation, other authorized bodies on the grounds provided for by the current legislation of the Russian Federation.
- 11.5. The Operator has the right to entrust the processing to third parties if such processing is necessary for the performance of the contract with the User or the User has provided the appropriate consent.

12. FINAL PROVISIONS

- 12.1. The term of processing of personal data processed by the Operator is determined by the organizational and administrative documents of the Operator in accordance with the provisions of the Federal Law "On Personal Data".
- 12.2. This Policy is subject to change, addition in the event of new legislative acts and special regulations on the processing and protection of personal data, as well as by the decision of the Operator.
- 12.3. Control over the implementation of the requirements of this Policy is carried out by the person responsible for organizing the processing of personal data.
- 12.4. Issues not regulated by this Policy are regulated by the current legislation of the Russian Federation.

13. BANK DETAILS OF THE OPERATOR

Full name	Foundation for the Support of Anti-Cancer Organizations "Together Against Cancer"
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The name in English	Together Against Cancer Fund
Legal address	11, Ordzhonikidze Str., Bld. 11, prem. IV, room 2, Donskoy Intracity Municipality, 115419, Moscow
Actual location address	11, Ordzhonikidze Str., Bld. 11, floor 2, office 220, 115419, Moscow
INN (Taxpayer Identification Number)/KPP (Registration Reason Code)	7704275879/772501001
OGRN (Primary State Registration Number)	1097799007492
OKPO (All-Russian Classifier of Enterprises and Organizations) code	61721825
Telephone	+7 (495) 419-07-96
Email	info@protiv-raka.ru , fond@protiv-raka.ru oncotoday@protiv-raka.ru
President of the Foundation	Bakhodur Sharifovich Kamolov