

# Privacy Policy on the Processing of Personal Data

## 1. General Provisions

This Personal Data Processing Policy has been prepared in accordance with the requirements of Federal Law of 27.07.2006 No. 152-FZ “On Personal Data” (hereinafter referred to as the “Personal Data Law”) and defines the procedure for processing personal data and measures to ensure the security of personal data taken by Art of Events (hereinafter referred to as the “Operator”).

1.1. The Operator sets as its most important goal and condition for carrying out its activities the observance of human and civil rights and freedoms in the processing of personal data, including the protection of the rights to privacy, personal and family secrets.

1.2. This Policy of the Operator regarding the processing of personal data (hereinafter referred to as the “Policy”) applies to all information that the Operator may receive about visitors to the website <https://arteventsphuket.com>.

## 2. Basic Terms Used in the Policy

2.1. Automated processing of personal data – processing of personal data using computer technology.

2.2. Blocking of personal data – temporary termination of the processing of personal data (except when processing is necessary to clarify personal data).

2.3. Website – a set of graphic and information materials, as well as computer programs and databases that ensure their availability on the Internet at the network address <https://arteventsphuket.com>.

2.4. Personal data information system – a set of personal data contained in databases, as well as information technologies and technical means ensuring their processing.

2.5. Depersonalization of personal data – actions that make it impossible to determine, without additional information, whether personal data belongs to a specific User or another subject of personal data.

2.6. Processing of personal data – any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, updating (modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.7. Operator – a state authority, municipal authority, legal or natural person that, independently or jointly with others, organizes and/or carries out the processing of personal data, and also determines the purposes of processing, the composition of personal data to be processed, and the actions (operations) performed with personal data.

2.8. Personal data – any information directly or indirectly related to a specific or identifiable User of the website <https://arteventsphuket.com>.

2.9. Personal data permitted by the subject of personal data for dissemination – personal data to which an unlimited number of persons have access, granted by the subject of personal data by giving consent for the processing of such data in the manner provided for by the Personal Data Law.

2.10. User – any visitor to the website <https://arteventsphuket.com>.

2.11. Provision of personal data – actions aimed at disclosing personal data to a certain person or a certain group of persons.

2.12. Distribution of personal data – any actions aimed at disclosing personal data to an indefinite number of persons (transfer of personal data) or at familiarizing an unlimited number of persons with personal data, including the publication of personal data in the media, posting in information and telecommunication networks, or providing access to personal data in any other way.

2.13. Cross-border transfer of personal data – transfer of personal data to the territory of a foreign state, to the authority of a foreign state, a foreign natural or foreign legal person.

2.14. Destruction of personal data – any actions that result in the irreversible destruction of personal data with the impossibility of further restoration of the personal data content in the personal data information system and/or the destruction of physical media containing personal data.

### **3. Main Rights and Obligations of the Operator**

3.1. The Operator has the right to:

- receive reliable information and/or documents containing personal data from the subject of personal data;
- continue processing personal data without the consent of the subject of personal data in cases provided for by the Personal Data Law;
- independently determine the composition and list of measures necessary and sufficient to ensure compliance with the obligations under the Personal Data Law.

3.2. The Operator must:

- provide the subject of personal data, at their request, with information relating to the processing of their personal data;
- organize the processing of personal data in accordance with the current legislation of the Russian Federation;
- respond to inquiries from subjects of personal data and their legal representatives in accordance with the requirements of the Personal Data Law;
- notify the authorized body for the protection of the rights of subjects of personal data of necessary information at its request within 10 days from the date of such request;
- publish or otherwise provide unrestricted access to this Policy;
- take legal, organizational, and technical measures to protect personal data;
- cease the transfer, distribution, and destruction of personal data in cases provided for by the Personal Data Law.

### **4. Main Rights and Obligations of Personal Data Subjects**

4.1. Personal data subjects have the right to:

- receive information related to the processing of their personal data;
- demand clarification, blocking, or destruction of their personal data if it is incomplete, outdated, inaccurate, illegally obtained, or unnecessary for the stated purpose of processing;
- set a condition of prior consent for processing their personal data for marketing purposes;

- withdraw consent to the processing of personal data;
- file complaints about the Operator's actions with the authorized body or in court;
- exercise other rights provided by the legislation of the Russian Federation.

4.2. Personal data subjects must:

- provide the Operator with accurate information about themselves;
- inform the Operator of updates or changes to their personal data.

## **5. Principles of Personal Data Processing**

5.1. The processing of personal data is carried out on a lawful and fair basis.

5.2. The processing of personal data is limited to achieving specific, predetermined, and lawful purposes.

5.3. The processing of personal data that is incompatible with the purposes of collecting personal data is not permitted.

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

5.5. The content and scope of personal data processed correspond to the stated purposes of processing.

5.6. The processing of personal data ensures the accuracy of personal data, their sufficiency, and, where necessary, relevance in relation to the purposes of processing.

5.7. Storage of personal data is carried out in a form that makes it possible to identify the subject of personal data, no longer than is required for the purposes of processing.

## **6. Purposes of Personal Data Processing**

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

- to identify the User;
- to provide the User with access to personalized website resources;
- to establish feedback with the User, including sending notifications, requests, and information concerning the use of the website, and processing requests and applications from the User;
- to improve the quality of the website and services offered;
- to carry out advertising activities with the User's consent.

## **7. Conditions for Processing Personal Data**

7.1. The Operator processes the User's personal data only if they are filled in and/or sent by the User independently through special forms located on the website <https://arteventsphuket.com>.

7.2. By filling out the relevant forms and/or sending their personal data to the Operator, the User expresses their consent to this Policy.

7.3. The Operator processes depersonalized data about the User if it is allowed in the User's browser settings (cookies and use of JavaScript technology enabled).

## **8. Procedure for the Collection, Storage, Transfer, and Other Processing of Personal Data**

The security of personal data processed by the Operator is ensured by implementing legal, organizational, and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.

#### **9. Cross-Border Transfer of Personal Data**

Before starting the cross-border transfer of personal data, the Operator must ensure that the foreign state to whose territory personal data is intended to be transferred provides reliable protection of the rights of subjects of personal data.

#### **10. Confidentiality of Personal Data**

The Operator and other persons who have gained access to personal data must not disclose or distribute personal data to third parties without the consent of the subject of personal data, unless otherwise provided by federal law.

#### **11. Final Provisions**

11.1. The User can receive any clarifications on issues concerning the processing of their personal data by contacting the Operator via email: [info@arteventsphuket.com](mailto:info@arteventsphuket.com).

11.2. Any changes to the Operator's Policy regarding the processing of personal data will be reflected in this document. The Policy is valid indefinitely until replaced by a new version.

11.3. The current version of the Policy is freely available on the Internet at <https://arteventsphuket.com>.