

# PERSONAL DATA PROCESSING POLICY

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FOR BRICS PAY SITE [WWW.BRICS-PAY.COM](http://WWW.BRICS-PAY.COM)

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## TABLE OF CONTENTS

1. GENERAL PROVISIONS.....	2
3. LEGAL BASIS FOR PERSONAL DATA PROCESSING.....	5
4. VOLUME AND CATEGORIES OF PROCESSED PERSONAL DATA, CATEGORIES OF PERSONAL DATA SUBJECTS.....	5
5. PERSONAL DATA PROCESSING TERMS AND CONDITIONS.....	6
6. BLOCKING, CLARIFICATION, AND DESTRUCTION OF PERSONAL DATA. RESPONSES TO USER REQUESTS FOR ACCESS TO PERSONAL DATA.....	8
7. LIABILITY OF THE PARTIES.....	9
8. DISPUTE RESOLUTION.....	10
9. FINAL PROVISIONS.....	10

## 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 BRICS Pay JSC website (hereinafter referred to as the Operator) on the website in the information and telecommunications network Internet at the address: [www.brics-pay.com](http://www.brics-pay.com) (hereinafter referred to as the Website).

1.2. This Policy has been developed based on Clause 2, Part 1, Article 18.1 of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data," as well as the Recommendations for Drafting a Document Defining the Operator's Policy Regarding the Processing of Personal Data, in the manner established by Federal Law No. 152-FZ of July 27, 2006 "On Personal Data."

1.3. In pursuance of the requirements of Part 2, Article In accordance with Article 18.1 of Federal Law No. 152-FZ of July 27, 2006, "On Personal Data," the Policy is publicly available on the Operator's Website at [www.brics-pay.com](http://www.brics-pay.com).

1.4. This Privacy Policy applies only to the Website. The Operator does not control and is not responsible for third-party websites to which the User may access links available on the Website.

1.5. The terms contained in Article 3 of Federal Law No. 152-FZ of July 27, 2006, "On Personal Data" are used in this Policy with the same meaning.

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

**User** - any person visiting the Website and using the information, materials, and services on the Website. The Website user is a subject of personal data within the meaning of Federal Law No. 152-FZ of July 27, 2006, "On Personal Data."

**The Website** is a collection of graphic and informational materials, as well as computer programs and databases, making them available online at the address [www.brics-pay.com](http://www.brics-pay.com).

1.7. Rights and Obligations of the Operator.

1.7.1. The Operator is obligated to:

- 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 July 27, 2006 "On Personal Data" and the regulatory legal acts adopted in accordance therewith;

- not 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 stipulated by Federal Law No. 152-FZ of July 27, 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 provide reasoned responses;
- provide the User (or their legal representative) with free access to their personal data;
- take measures to clarify, block, and destroy the User's personal data in cases established by Federal Law No. 152-FZ of July 27, 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 July 27, 2006 "On Personal Data" and regulatory legal acts adopted in accordance therewith, unless otherwise provided by Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" or other federal laws;
- entrust the processing of personal data to another person with the consent of the User, unless otherwise provided by federal law, on the basis of an agreement concluded with this person, including a state or municipal contract, or by the adoption of a corresponding act by a state or municipal body;
- in the event of the User's withdrawal of consent to the processing of personal data, continue the processing of personal data without the User's consent, provided that there are grounds specified in Federal Law No. 152-FZ of July 27, 2006 "On Personal Data";
- receive from the User reliable information and/or documents containing the User's personal data for the processing purposes specified in Section 2.2 of the Policy;
- require the User to promptly update the personal data provided.

#### 1.8. User Rights and Obligations.

##### 1.8.1. The User is obligated to:

- ensure the accuracy of the personal data provided to the Operator, as required for the processing purposes specified in Section 2.2 of the Policy;
- provide the Operator with information, if necessary, to clarify (update, amend) the personal data provided.

#### 1.8.2. The User has the right:

- to complete information regarding the processing of their personal data by the Operator, except in cases stipulated by the legislation of the Russian Federation;
- have their personal data clarified, blocked, or destroyed if the personal data is incomplete, outdated, inaccurate, illegally obtained, or is not necessary for the stated purpose of processing;
- revoke consent to the processing of personal data;
- take measures to protect their rights as provided by law;
- appeal to the authorized body for the protection of the rights of personal data subjects or in court against the illegal actions or inaction of the Operator in the processing of their personal data;
- providing prior consent to the processing of personal data for the purpose of receiving advertising.

## 2. PURPOSES OF PERSONAL DATA PROCESSING

2.1. The processing of personal data is limited to achieving specific, predetermined, and legitimate purposes. Processing of personal data incompatible with the purposes for which it was collected is prohibited. The processed personal data must not be excessive in relation to the stated purposes of its processing.

Only personal data that meets the purposes for which it is processed may be processed.

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

2.2.1. Establishing feedback with the User, including sending notifications and requests regarding the use of the Website, provision of services, performance of work, and processing requests and applications from the User.

2.2.2. Determining the User's location to ensure security and prevent fraud using the User's personal data on the Website.

2.2.3. Providing the User with effective technical support in the event of problems related to the use of the Website.

#### 2.2.4. Sending advertising to the User with their prior consent.

### 3. LEGAL BASIS FOR PERSONAL DATA PROCESSING

3.1. The legal basis for the processing of 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 July 27, 2006 "On Information, Information Technologies, and the Protection of Information";
- Federal Law No. 294-FZ of December 26, 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 March 6, 1997 "On Approval of the List of Confidential Information";
- Resolution of the Government of the Russian Federation No. 1119 of November 1, 2012 "On Approval of the Requirements for the Protection of Personal Data When Processing It in Personal Data Information Systems";
- Order of the Federal Service for Technical and Export Control of Russia dated February 18, 2013, No. 21 "On Approval of the Composition and Content of Organizational and Technical Measures to Ensure the Security of Personal Data When Processed in Personal Data Information Systems";
- Consent to the processing of personal data on the Website.

### 4. VOLUME AND CATEGORIES OF PROCESSED PERSONAL DATA, CATEGORIES OF PERSONAL DATA SUBJECTS

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

4.2. The personal data processed by the Operator includes:

- email address;
- data automatically transferred to the Website's services during their use via software installed on the User's device, namely: IP address, cookie data, information about the User's browser (or other program used to access the services), technical specifications of the equipment and software used by the User, date and time of access to services, addresses of requested pages, and history of requests and views on the Website and its services.

4.3. The Operator ensures that the content and volume of processed personal data comply with the stated processing purposes set out in Section 2 of the Policy.

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

## **5. PERSONAL DATA PROCESSING TERMS AND CONDITIONS**

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

- manual processing of personal data;
- automated processing of personal data, with or without the transmission of received information via information and telecommunications networks;
- mixed processing of personal data.

5.2. The list of actions performed by the Operator with the User's personal data for the purposes specified in Section 2.2 of the Policy: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, depersonalization, blocking, deletion, and destruction.

5.3. The Operator processes personal data subject to the User's consent (hereinafter referred to as "Consent"), obtained in accordance with the requirements of Federal Law No. 152-FZ of July 27, 2006, "On Personal Data," except in cases established by Russian legislation where personal data may be processed without such Consent.

5.4. The User decides to provide their personal data and gives Consent freely, of their own free will, and in their own interests.

5.5. The processing period for personal data is determined by the achievement of the purposes for which the personal data was collected, unless a different period is provided for in the agreement with the User or by applicable law.

The termination of personal data processing may be the achievement of the purposes for which the personal data was collected or the loss of the need to achieve these purposes, the expiration of the Consent or the revocation of the Consent by the User, or the detection of unlawful processing of personal data.

5.6. Consent may be revoked in the following manner: by sending a written request to the email address [support@brics-pay.com](mailto:support@brics-pay.com), while simultaneously sending a paper request to the following address: 109052, Moscow, Nizhegorodsky Municipal District, Ryazansky Prospekt, Bldg. 3B, Office 17/3

5.7. The Operator distributes personal data permitted for distribution by the User, i.e., carries out actions aimed at disclosing them to an indefinite number of persons, in compliance with the requirements, prohibitions, and conditions established by Part 9 of Article 9 and Article 10.1 of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data". Disclosure to third parties and distribution of personal data without the consent of the User is prohibited, unless otherwise provided by federal law. Consent to the processing of personal data authorized by the User for distribution is drawn up separately from other consents of the User for the processing of their personal data, taking into account the Requirements for the Content of Consent to the Processing of Personal Data Authorized for Distribution by the Personal Data Subject, approved by Order No. 18 of Roskomnadzor dated February 24, 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, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data.

5.9. Personal data is stored in a form that allows identification of the User, for a period no longer than required for the purposes of processing the personal data, except in cases where the storage period of personal data is established by federal law, an agreement 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 July 27, 2006, "On Personal Data."

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

5.12. The Operator does not carry out cross-border transfers of personal data.

5.13. In the event of unauthorized or accidental transfer (provision, distribution, access) of personal data, the Operator will inform the User thereof within 5 (five) business days.

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



## **6. BLOCKING, CLARIFICATION, AND DESTRUCTION OF PERSONAL DATA. RESPONSES TO USER REQUESTS FOR ACCESS TO PERSONAL DATA**

6.1. If unlawful processing of personal data is detected upon a request from the User (their representative) or at the request of the User (their representative) or the authorized body for the protection of the rights of personal data subjects, the Operator will block the unlawfully processed personal data related to the relevant User or ensure its blocking from the moment of such request or upon receipt of the User's specified request for the verification period.

If inaccurate personal data is detected upon a request from the User or their 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 will block the personal data related to that User or ensure its blocking from the moment of such request or upon receipt of the specified request for the verification period, provided that blocking the personal data does not violate the rights and legitimate interests of the User or third parties.

6.2. In the event of confirmation of the fact of inaccuracy of personal data, 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 the unlawful processing of personal data is detected, the Operator shall, within a period not exceeding three business days from the date of such detection, cease the unlawful processing of personal data or ensure that the unlawful processing of personal data is terminated. If the lawfulness of the processing of personal data cannot be ensured, the Operator shall destroy such personal data or ensure that it is destroyed within a period not exceeding ten business days from the date of detection of the unlawful processing of personal data.

6.4. If the purpose of processing personal data is achieved, the Operator shall destroy the personal data or ensure that it is destroyed within a period not exceeding thirty days from the date of achieving the purpose of processing the personal data, unless otherwise provided by an agreement to which the User is a party, beneficiary, or guarantor, or by another agreement between the Operator and the User, or if the Operator is not entitled to process personal data without the consent of the User on the grounds stipulated by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" or other federal laws.

6.5. If the User revokes their consent to the processing of their personal data and if the storage of the personal data is no longer required for the purposes of processing the



personal data, the Operator shall destroy the personal data or ensure its destruction within a period not exceeding thirty days from the date of receipt of such revocation, unless otherwise provided by an agreement to which the User is a party, beneficiary, or guarantor, or another agreement between the Operator and the User, or unless the Operator is not entitled to process personal data without the User's consent on the grounds stipulated 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 business days from the date the User (their representative) provides information confirming that such personal data was obtained illegally or is not necessary for the stated purpose of processing, the Operator shall destroy such personal data.

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

6.8. The Operator responds to requests and inquiries from the User (their representative) regarding the processing of their personal data as follows: within 20 (twenty) business days from the date of receipt of the request, by sending a response from the email address specified in this Policy.

## **7. LIABILITY OF THE PARTIES**

7.1. The Operator is liable for violation of the requirements of Federal Law No. 152-FZ of July 27, 2006, "On Personal Data," in accordance with the legislation of the Russian Federation.

7.2. The User has the right to seek compensation for damages and/or moral damages through legal proceedings.

Moral damages caused to the User as a result of the violation of their rights, the violation of personal data processing rules, or the personal data protection requirements established in accordance with Federal Law No. 152-FZ of July 27, 2006, "On Personal Data," as well as the provisions of this Policy, are subject to compensation in accordance with the legislation of the Russian Federation. Compensation for moral damages is provided regardless of compensation for property damage and losses incurred by the User.

## 8. DISPUTE RESOLUTION

8.1. In the event of disputes and/or disagreements arising from the relationship between the User and the Operator, such matters shall be resolved in accordance with the current legislation of the Russian Federation.

8.2. The current legislation of the Russian Federation shall apply to the Policy and the relationship between the User and the Operator.

## 9. FINAL PROVISIONS

9.1. The Operator reserves the right to amend the Policy without the User's consent.

9.2. The new version of the Policy shall take effect upon its posting on the Website, unless otherwise provided in the new version of the Policy.

The new version of the Policy shall apply to relations arising after its entry into force.

9.3. Any suggestions or questions regarding the Policy should be sent to: [support@brics-pay.com](mailto:support@brics-pay.com).

