

PRIVACY POLICY FOR MOBILE APPLICATION

"RUT (MIIT)"

1. DEFINITION OF CONCEPTS

“Law” means the Federal Law of the Russian Federation “On Personal Data” with all amendments and additions, as well as other legislative acts of the Russian Federation.

“Controller” means the person who is responsible for the processing and protection of Personal Data of Users located in the EU within the meaning of the General Data Protection Regulation of April 27, 2016 (“GDPR”).

"Mobile application" is software (with all existing additions and improvements) designed to run on smartphones, tablets, watches and other mobile devices, and developed for a specific platform (iOS, Android, Windows Phone, etc.). For the purposes of this Policy, the Mobile Application means the following software: RUT (MIIT).

“Personal data” means a set of personal data and/or non-personalized information about the User provided by the User himself to the Copyright Holder and/or automatically collected by the Copyright Holder and/or third parties.

“Policy” means this Mobile Application Privacy Policy (with all existing additions and changes).

“User” means a legal entity or individual who has downloaded the Mobile Application to a smartphone, tablet, watch or any other mobile device and/or activated such a Mobile Application on one of the specified devices.

“User Agreement” means an agreement concluded between the Copyright Holder and the User regarding the procedure, rules and features of the User’s use of the Mobile Application. The user accedes to such an agreement and does not have the right to make and/or demand any changes or additions to it. The user can read the terms of the User Agreement at the following link: <https://rut-miit.ru/mobile-app/terms-of-use-pdf>.

"Copyright Holder" means the following person who has exclusive ownership rights to the Mobile Application

Federal State Autonomous Educational Institution of Higher Education "Russian University of Transport"

Phone: +7 495 681-13-40 (fax); +7 495 684-23-96 (correspondence registration)

E-mail: info@rut-miit.ru; tu@miit.ru (correspondence registration)

Location: GUK-1: 1222

Address: 127994, GSP-4, Moscow, Obraztsova str., 9, building 9

“Processor” means a person who, within the meaning of the GDPR, on behalf of the Controller, carries out the storage and/or processing of Personal Data received from Users.

“Cookies” means small files sent to any mobile application or site and placed on the User’s smartphones, tablets, watches and other mobile devices to improve the

performance of such applications or sites, as well as the quality of the content contained therein.

2. RELATIONS COVERED BY THE POLICY

General provisions

This Policy is used and applies exclusively to Personal Data received from the User in connection with his use of the Mobile Application. The provisions of this Policy are aimed at:

- (1) determination of the types and types of Personal Data received, directions and purposes of use (processing) of Personal Data, as well as sources of obtaining such Personal Data; And
- (2) determination of the User's rights regarding the protection of the confidentiality of Personal Data transmitted by him; And
- (3) identification of persons responsible for the processing and storage of Personal Data, as well as third parties to whom such data is disclosed (in whole or in part).

The rules of this Policy do not apply in case of processing by third parties of Personal Data that is voluntarily provided by the User.

By installing and/or activating the Mobile Application on a smartphone, tablet, watch or other mobile device, the User agrees to the terms of this Policy and gives his consent to the Copyright Holder to collect, process, retain and store Personal Data in the manner and under the conditions provided for in this Policy.

If the User does not agree with the terms of the Policy and/or certain terms of the Policy are not clear to him, in this case the User is obliged to immediately stop using the Mobile Application.

User rights to protect personal data

In connection with the provision of Personal Data, the User automatically receives the following rights:

- (1) receive data relating to their processing (grounds and purposes of such processing, applied methods of processing, information about persons who have access to them or to whom they can be disclosed on the basis of a contract or Law).
- (2) receive data on the location and identification data of the persons processing Personal Data.
- (3) receive information about the storage periods of Personal Data.
- (4) receive information about completed or intended cross-border transfers of Personal Data.

(5) appeal the actions or inaction of the Copyright Holder to the authorized body for the protection of the rights of personal data subjects or in court.

(6) receive compensation for losses and/or compensation for moral damage in court as a result of violations of the User's rights to the protection and protection of his Personal Data by the Copyright Holder and/or third parties.

(7) exercise other rights in the field of personal data protection provided for by the Law or the provisions of this Policy.

3. LIST OF PERSONAL DATA COLLECTED

Non-personal information about users

In connection with the use of the Mobile Application, the Copyright Holder can automatically collect and process the following non-personal information about the User:

(1) information about traffic, the possible number of clicks, logs and other data.

(2) information about the device (identification number, mobile operator network) from which you are logging in, operating system, platform, browser type and other information about the browser, IP address.

Personal data about users

The User provides the Copyright Holder with the following personal information about himself:

(1) full last name, first name and patronymic.

(2) date of birth and age.

(3) address of permanent residence.

(4) email address.

(5) mobile phone number.

(6) User's gender.

(7) citizenship of the User.

(8) a photograph depicting the User.

(9) data contained in the User's personal account (profile), all internal correspondence of the User (if any), as well as other activity of the User's personal account (profile).

(10) data on all publications made by the User in the Mobile Application, including, but not limited to, comments, ratings, reviews, publication of reports, videos and photographs, liking, ratings and/or any other forms of activity available to the User in Mobile application and/or content created.

(11) data and information obtained as a result of combining certain Personal Data of a particular User, as well as data and information obtained about the User received from third parties (partners, marketers, researchers).

The user is the only responsible person for the completeness of the personal data provided and is obliged to change it in a timely manner (updating, checking, adjusting) on a regular basis.

The Copyright Holder assumes that all personal data provided by the User is reliable and that the User keeps such information up to date.

Use of cookies

The mobile application does not use cookies.

4. PURPOSES OF COLLECTION AND PROCESSING OF PERSONAL DATA

Determination of processing purposes

The collection and processing of Personal Data is carried out for the following purposes:

- (1) to analyze the User's behavior, as well as identify the User's preferences for a certain type of content.
- (2) for the prompt and correct operation of the Mobile Application, improving the functioning of the Mobile Application, improving the content of the Mobile Application, improving the internal architecture and functionality of the Mobile Application.
- (3) to identify the User.
- (4) to comply with the requirements of the Law.
- (5) for technical support of the Mobile application, identifying problems in its operation and eliminating them.
- (6) to maintain contact with the User (communication).
- (7) to fulfill other obligations of the Copyright Holder that have arisen to the User.
- (8) for any other purposes, subject to separate consent from the User.

The processing of Personal Data is carried out on the basis of the following principles:

(1) the legality of the purposes and methods of processing; and (2) integrity; and (3) compliance of the purposes of processing of Personal Data with the purposes previously determined and stated when collecting such Personal Data; and (4) compliance of the volume and nature of the Personal Data processed with the stated purposes of their processing.

Conditions for processing personal data

Processing of Personal Data is carried out in the following cases: (1) obtaining consent from the User; or (2) achievement by the Copyright Holder of the goals provided for by an international treaty or Law; or (3) the User provides his Personal Data to an unlimited number of persons; or (4) fulfilling other obligations of the Copyright Holder to the User, including, but not limited to, providing certain content to the User; or (5) saving the life or health of the User when consent to the processing of his Personal Data cannot be obtained in advance.

In the event of depersonalization of Personal Data, which does not allow direct or indirect identification of the User, subsequent use and disclosure of such data to third parties is permitted and the rules of this Policy no longer apply to them.

The Copyright Holder takes all possible measures to protect the confidentiality of the received Personal Data, except in cases where the User has made such data publicly available.

Processing of Personal Data is carried out using automation tools and without the use of such automation tools.

5. ACCESS OF THIRD PARTIES TO PERSONAL DATA

Disclosure of personal data to third parties

The copyright holder has the right to disclose Personal Data (1) to its affiliates, branches and representative offices opened both on the territory of the Russian Federation and on the territory of other states; (2) successors of the Copyright Holder who arose as a result of its liquidation, reorganization or bankruptcy, and who received exclusive rights to own the Mobile Application; (3) to third parties solely for the purpose of providing the User with or access to certain content; (4) to third parties when the User has given consent to the disclosure, transfer or processing of his Personal Data, as well as in other cases expressly provided for by the Law or this Policy.

The Copyright Holder discloses Personal Data only if (1) it is confident that third parties will comply with the terms of this Policy and take the same measures to protect the confidentiality of Personal Data that the Copyright Holder itself takes, and (2) consent to such disclosure has been previously expressed by the User and/or permitted on the basis of the Law.

6. ADVERTISING

Advertising in a mobile application

The Copyright Holder does not place advertising in the Mobile Application.

7. DIRECTION OF COMPLAINTS AND QUESTIONS TO THE COPYRIGHT HOLDER

Request to stop processing personal data

Each User has the right to express his objection to the Copyright Holder against the processing and/or storage of his Personal Data. Such an objection can be expressed as follows:

Send a request to the official email info@rut-miit.ru

Request for information about personal data

If the User has questions related to the procedure for applying or using this Policy, the procedure and/or method of processing Personal Data, the User can ask such a question as follows:

The request must be sent to the Copyright Holder at the following address: support@rut-miit.ru

Change (update, addition, correction) or deletion of personal data

The user has the right to independently change or delete his Personal Data at any time, except in cases where such change or deletion may lead to (1) a violation of the rules of this Policy; or (2) to violate the Law; (3) the nature of such Personal Data is evidence in any litigation arising between the Copyright Holder and the User. To do this, the User needs to delete his personal account (profile) in the Mobile Application.

The Copyright Holder has the right to delete the User's personal account/profile at any time, as well as all Personal Data about the User if he has violated the terms of this Policy and/or the User Agreement.

If Personal Data about the User is deleted, all publications made by such User (comments, ratings, reviews, publication of reports, videos and photographs, liking, ratings) and/or any other forms of activity available to the User in Mobile application.

8. TERMS AND PROCEDURE FOR STORING PERSONAL DATA

Storage is carried out independently by the Copyright Holder.

Storage is carried out for the entire period necessary to achieve the stated purposes of processing Personal Data.

The Copyright Holder undertakes to immediately destroy or depersonalize the Personal Data immediately after achieving the purposes of processing Personal Data.

9. ACCESS OF MINORS TO THE MOBILE APPLICATION

Users in the Russian Federation

The mobile application can be used by persons under the age of 18.

The mobile application collects personal data about Users, therefore the use of this application by minor Users is permitted only upon receipt of prior consent from the legal representative (guardian) for the processing of Personal Data. Such consent must be provided in the following way:

Consent is transferred at the time of registration of relations with the university in accordance with the legislation of the Russian Federation

If a minor User cannot provide consent to the processing of his Personal Data from his legal representative (guardian), in this case such User is obliged to immediately stop using the Mobile Application.

Users in the European Union

The mobile application and/or its content is intended for persons under 16 years of age.

Since the Mobile Application collects personal data about Users, the use of this application by Users under the age of 16 (unless a lower threshold is established by the national legislation of the Member State of the European Union in whose territory access to the Mobile Application is provided) is permitted only with the prior consent of legal representative (guardian) for the processing of Personal Data, which must be provided in the following way:

Consent is obtained at the time of formalizing the relationship with the university in accordance with the legislation of the Russian Federation

10. PROCEDURE FOR PROTECTING PERSONAL DATA

Protecting the confidentiality of Personal Data is a primary and important task for the Copyright Holder. The Copyright Holder adheres to all required international standards, rules and recommendations for the protection of Personal Data.

The Copyright Holder has implemented a number of technical and organizational methods aimed at protecting Personal Data from disclosure or unauthorized access to it by third parties.

11. USERS LOCATED IN THE EUROPEAN UNION

General provisions

Since the Mobile Application is available to users from the European Union, the Copyright Holder undertakes to additionally adhere to the provisions of the GDPR.

The Controller for the purposes of this Policy is the Copyright Holder.

The Copyright Holder stores Personal Data for a reasonable period of time necessary to achieve the purposes of processing, but not less than the period established by the local legislation of the Member State of the European Union in which the Mobile Application is available for storing one or another type of Personal Data. Upon expiration of the period established for storage, the Copyright Holder undertakes to immediately destroy or depersonalize such data.

User rights in the field of personal data protection

According to Chapter 3 of the GDPR, Users located in the European Union have the following rights in the field of Personal Data protection: (1) the right to receive information about their Personal Data (“the right to be informed”); and (2) the right to access your Personal Data (“the right of access”); and (3) the right to rectification of Personal Data; and (4) the right to erasure of Personal Data (“the right to erasure”); and (5) the right to restrict processing of Personal Data; and (6) the right to transfer Personal Data to third parties (“the right to data portability”); and (7) the right to object.

Appointment of a data protection officer

The Controller appoints the following person: ANDREY VIKTOROVICH RODIONOV to the position of a special personal data protection officer, whose main purpose is to

comply with personal data protection legislation, including GDPR (hereinafter referred to as the "Officer"). Officer contact details:

Tel: 8(495)662-99-43 ext.102, e-mail: it@miit.ru, opening hours: from 9.00 to 18.00

12. FINAL PROVISIONS

Availability of the policy text for review

Users can familiarize themselves with the terms of this Policy at the following link: <https://rut-miit.ru/mobile-app/privacy-pdf>.

This Policy may be translated into a foreign language for those Users who access the Mobile Application outside the Russian Federation. In case of discrepancy between the original text (Russian language) and its translation, the original language shall prevail.

This version of the Policy is effective November 7, 2022.

Changes and additions to the policy

This Policy may be changed from time to time. The Copyright Holder does not bear any responsibility to the User for changing the terms of this Policy without the permission and/or consent of the User.

The User undertakes to regularly check the provisions of this Policy for possible changes or additions.

Applicable Law

This Policy has been developed in accordance with the current legislation on the protection of personal data of the Russian Federation, in particular, with the norms of the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data" (with all additions and changes), the Federal Law of July 21, 2014 No. 242-FZ "On amendments to certain legislative acts of the Russian Federation in terms of clarifying the procedure for processing personal data in information and telecommunication networks" (with all additions and changes), as well as the provisions of the General Data Protection Regulation dated April 27, 2016 GDPR.

Risk of disclosure

Regardless of the measures taken by the Copyright Holder to protect the confidentiality of the received personal data, the User is hereby considered to be properly aware that any transfer of Personal data on the Internet cannot be guaranteed secure, and therefore the User carries out such transfer at his own risk.

Public information

Within the Mobile Application, the User has the right to publish and post any content at his own discretion and in any of the available forms (photo, video, comment, article, rating, blog, etc.). Such publications and content are publicly available to other users of the Mobile Application, and therefore the Copyright Holder does not undertake any obligations to protect Personal Data that may be made public or published as part of such publication and/or content.