

Privacy policy

1. General provisions

This policy of personal data processing is compiled in accordance with the requirements of the Law of Ukraine "On Personal Data Protection" (hereinafter the Law on Personal Data) and determines the procedure for personal data processing and measures to ensure the security of personal data used by FOP Larin SA). 1.1. The Operator sets the most important goal and condition of its activities to respect the rights and freedoms of man and citizen in the processing of personal data, including protection of privacy, personal and family secrets. 1.2. This policy of the Operator on the processing of personal data (hereinafter - the Policy) applies to all information that the Operator may receive about visitors to the website <https://sensei.ua>.

2. Basic concepts used in Politics

2.1. Automated processing of personal data - processing of personal data by means of computer technology. 2.2. Blocking of personal data - temporary cessation of personal data processing (except in cases where processing requires clarification of personal data) . 2.3. Website - a set of graphics and information materials, as well as computer programs and databases that ensure their availability on the Internet at the network address <https://sensei.ua>. 2.4. Information system of personal data - a set of personal data contained in databases, and provide their processing of information technology and technical means. 2.5. Impersonal data - actions in which it is impossible to determine without the use of additional information the ownership of personal data object of personal data. 2.6. Processing of personal data - any action (operation) or set of actions (operations) carried out with or without the use of automation means with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change) , removal, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data. 2.7. Operator - a state body, municipal body, legal or natural person who independently or jointly with other persons organize and (or) process personal data, as well as determine the purposes of personal data processing, the composition of personal data to be processed, actions (operations) carried out with personal data. 2.8. Personal data - any information relating directly or indirectly to a specific or specific User of the website <https://sensei.ua>. 2.9. Personal data allowed by the subject of personal data for distribution, personal data, access to an unlimited number of persons to which the personal data subject has provided by giving consent to the processing of personal data permitted by the personal data subject for distribution in the manner prescribed by the Personal Data Act (hereinafter personal data permitted for dissemination) . 2.10. User - any visitor to the site <https://sensei.ua>. 2.11. Provision of personal data - actions created to disclose personal data to a certain person or a certain group of persons. 2.12. Dissemination of personal data - any action aimed at disclosing personal data to an indefinite number of persons (transfer of personal data) or accessing personal data of an unlimited number of persons, including disclosure of personal data in the media, placement in information and telecommunications 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 a foreign authority, foreign natural or foreign legal entity. 2.14. Destruction of personal data - any actions as a result of which personal data are irreversibly destroyed with the impossibility of further restoration of the content of personal data in the personal data information system and (or) material carriers of personal data are destroyed.

3. Basic rights and responsibilities of the Operator

3.1. The Operator has the right to: - receive from the personal data subject reliable information and / or documents containing personal data; - in case of withdrawal of personal data subject's consent to personal data processing, the Operator has the right to continue personal data processing without the consent of the personal data subject if there are grounds specified in the Personal Data Act; - independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations under the Law on Personal Data and regulations adopted in accordance with it, unless otherwise provided by the Law on Personal Data or other laws of Ukraine. 3.2. related: - to provide the subject of personal data at his request information on the processing of his

personal data; - organize the processing of personal data in the manner prescribed by current legislation of Ukraine; - respond to requests and inquiries of personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Act; - to notify the authorized body for the protection of the rights of personal data subjects at the request of this body of the necessary information within 30 days from the date of receipt of such a request; - publish or otherwise provide unrestricted access to this Privacy Policy; - take legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, alteration, blocking, copying, providing, disseminating personal data, as well as other illegal actions against personnel - stop the transfer (dissemination, provision, access) personal data, stop processing and destroy personal data in the manner and cases provided by the Law on Personal Data; - perform other duties provided by the Law on Personal Data.

4. Basic rights and responsibilities of personal data subjects

4.1. Personal data subjects have the right to: receive information on the processing of his personal data, except as provided by the laws of Ukraine. Information is provided to the personal data subject by the Operator in an accessible form and should not contain personal data belonging to other subjects. personal data, except where there are legitimate grounds for disclosing such personal data. The list of information and the procedure for obtaining it is established by the Law on Personal Data; - require the operator to clarify his personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, and take legal measures to protect their rights; - to set the condition of prior consent in the processing of personal data in order to promote goods, works and services on the market; - to revoke consent to the processing of personal data; - to appeal to the authorized body for protection of the rights of personal data subjects or in court against illegal actions or inaction of the Operator in the processing of his personal data; to exercise other rights provided by the legislation of Ukraine.4.2. Subjects of personal data are obliged to: provide the Operator with reliable data about themselves; notify the Operator about the clarification (update, change) of their personal data. 4.3. Persons who provided the Operator with inaccurate information about themselves or information about another personal data subject without the latter's consent shall be liable in accordance with the legislation of Ukraine.

5. The Operator may process such personal data of the User

5.1. Surname, name, patronymic.5.2. Email address.5.3. Phone numbers.5.4. Address of actual place of residence and registration at the place of residence and (or) at the place of stay.5.5. The site also collects and processes impersonal data about visitors (including cookies) using Internet statistics services (Yandex Metrics and Google Analytics and others) .5.6. The data listed below in the text of the Policy are united by the general concept of Personal Data.5.7. The Operator does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, or intimate life. 5.8. Processing of personal data allowed for distribution, among the special categories of personal data specified in Part 1 of Art. 10 of the Law on Personal Data, is allowed if the prohibitions and conditions provided for in Art. 10.1 of the Law on Personal Data.5.9. The User's consent to the processing of personal data permitted for distribution is issued separately from other consents to the processing of personal data. At the same time the conditions provided, in particular, Art. 10.1 of the Law on Personal Data. Requirements for the content of such consent shall be established by the authorized body for the protection of the rights of personal data subjects. 5.9.1 Consent to the processing of personal data permitted for distribution, the User provides to the Operator directly. The user to publish information about the conditions of processing, the existence of prohibitions and conditions for the processing of an unlimited number of personal data permitted for distribution. time at the request of the personal data subject. This requirement should include the surname, first name, patronymic (if any), contact information (telephone number, e-mail address or postal address) of the personal data subject, as well as a list of personal data subject to termination.5.9.4 Consent to the processing of personal data permitted for dissemination shall cease to be valid upon receipt by the Operator of the requirement specified in

paragraph 5.9.3 of this Policy on the processing of personal data. data.

6. Principles of personal data processing

6.1. The processing of personal data is carried out on a lawful and fair basis.6.2. The processing of personal data is limited to the achievement of specific, predetermined and legitimate goals.

Processing of personal data incompatible for the purpose of collecting personal data is not

allowed.6.3. 6.4. It is not allowed to combine databases containing personal data, the processing of

which is carried out for purposes incompatible with each other. Only personal data that meet the

purposes of their processing are subject to processing.6.5. The content and volume of processed

personal data correspond to the stated purposes of processing. Excessive processing of personal data

in relation to the stated purposes of their processing is not allowed.6.6. The processing of personal

data ensures the accuracy of personal data, their sufficiency, and, if necessary, the relevance of the

purposes of personal data processing. The operator takes the necessary measures and / or ensures

their adoption by deleting or clarifying incomplete or inaccurate data.6.7. Storage of personal data

is carried out in a form that allows to identify the subject of personal data, no longer than required

by the purpose of personal data processing, if storage of personal data is not established by the law

of Ukraine, the contract to which the beneficiary or guarantor of which is the subject of personal

data. The processed personal data shall be destroyed or depersonalized after the achievement of the

purposes of processing or in case of loss of the need to achieve these purposes, unless otherwise

provided by the law of Ukraine.

7. Purposes of personal data processing

7.1. The purpose of processing personal data of the User: - informing the User by sending e-mails; -

conclusion, execution and termination of civil law contracts.7.2. The Operator also has the right to

send the User notifications about new products and services, special offers and various events. The

User can always refuse to receive informational messages by sending a letter to the Operator to the

e-mail address (hidden) marked "Refusal of notifications about new products and services and

special offers" .7.3. Impersonal data of Users, which are collected through Internet statistics

services, are used to collect information about the actions of Users on the site, improve the quality

of the site and its content.

8. Legal basis of personal data processing

8.1. The legal grounds for the processing of personal data by the Operator are: - agreements

concluded between the operator and the personal data subject; - Law of Ukraine on Personal Data

Protection; - laws of Ukraine, other regulations in the field of personal data protection; - consent of

Users to the processing of their personal data, to the processing of personal data permitted for

distribution.8.2. 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://sensei.ua> or sent

to the Operator by e-mail. By filling in the appropriate forms and / or sending their personal data to

the Operator, the User agrees with this Policy.8.3. The Operator processes impersonal data about the

User if this is allowed in the settings of the User's browser (saving cookies and JavaScript

technology is enabled). 8.4. The personal data subject independently decides on the provision of his

personal data and gives consent freely, of his own free will and in his own interest.

9. Terms of personal data processing

9.1. 9.2. The processing of personal data is carried out with the consent of the subject of personal

data for the processing of his personal data.9.3. The processing of personal data is necessary to

achieve the objectives set out in an international agreement of Ukraine or the law, to perform the

functions, powers and responsibilities assigned to the operator by the legislation of Ukraine. 9.4.

The processing of personal data is necessary for the administration of justice, the execution of a

judicial act, an act of another body or official, which are subject to execution in accordance with the

legislation of Ukraine on enforcement proceedings. 9.5. The processing of personal data is

necessary for the performance of a contract to which either the beneficiary or guarantor is a party to

the personal data subject, as well as for the conclusion of a contract on the initiative of the personal

data subject or a contract under which the personal data subject will be the beneficiary or guarantor. 9.6. The processing of personal data is necessary to exercise the rights and legitimate interests of the operator or third parties or to achieve socially significant goals, provided that the rights and freedoms of the personal data subject are not violated. The processing of personal data is carried out, access of an unlimited number of persons to which the subject of personal data is provided or at his request (hereinafter - publicly available personal data) .9.7. The processing of personal data subject to publication or mandatory disclosure in accordance with the law of Ukraine is carried out.

10. Procedure for collection, storage, transfer and other types of personal data processing

The security of personal data processed by the Operator is ensured by implementing the legal, organizational and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.10.1. The Operator ensures the preservation of personal data and takes all possible measures to exclude access to personal data of unauthorized persons.10.2. Under no circumstances will the User's personal data be transferred to third parties, except in cases related to the implementation of applicable law or if the personal data subject has given consent to the Operator to transfer data to a third party to fulfill civil obligations. -legal agreement.10.3. In case of inaccuracies in personal data, the User can update them independently by sending a message to the Operator to the e-mail address of the Operator (hidden) marked "Update of personal data" .10.4. The term of personal data processing is determined by the achievement of the purposes for which personal data were collected, unless otherwise provided by contract or applicable law.) marked "Withdrawal of consent to the processing of personal data" .10.5.All information collected by third-party services, including payment systems, communications and other service providers, is stored and processed by these persons (Operators) in accordance with their User Agreement and Privacy Policy. The subject of personal data and / or the User is obliged to get acquainted with the specified documents independently. The Operator is not responsible for the actions of third parties, including the service providers specified in this paragraph. 10.6. Prohibitions imposed by the personal data subject on the transfer (except for granting access), as well as on the processing or processing conditions (other than access) of personal data permitted for distribution do not apply in cases of personal data processing in state, public and other public interests, defined by the legislation of Ukraine.10.7. The operator during the processing of personal data ensures the confidentiality of personal data.10.8. The operator stores personal data in a form that allows to determine the subject of personal data, no longer than required by the purposes of personal data processing, if the period of personal data storage is not established by law of Ukraine, the contract to which the beneficiary or guarantor personal data object. 10.9. The condition for termination of personal data processing may be the achievement of personal data processing goals, expiration of the consent of the personal data subject or revocation of the consent of the personal data subject, as well as detection of illegal personal data processing.

11. List of actions performed by the Operator with the received personal data

11.1. The Operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), removes, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes and destroys personal data. 11.2. The operator carries out automated processing of personal data with or without the receipt and transmission of information received over information and telecommunications networks.

12. Cross-border transfer of personal data

12.1. At the beginning of the cross-border transfer of personal data, the operator is obliged to make sure that the foreign state, the territory of which is supposed to transfer personal data, provides reliable protection of the rights of personal data subjects.12.2. Cross-border transfer of personal data in foreign countries that do not meet the above requirements may be carried out only with the written consent of the personal data subject to cross-border transfer of personal data and / or performance of a contract to which the personal data subject is a party .

13. Confidentiality of personal data

The Operator and other persons who have gained access to personal data are obliged not to disclose to third parties and not to disseminate personal data without the consent of the personal data subject, unless otherwise provided by the law of Ukraine.

14. Final provisions

14.1. The User may receive any clarifications on issues of interest related to the processing of his personal data by contacting the Operator by e-mail manager@sensei-cond.com.ua. 14.2. This document will reflect any changes in the policy of personal data processing by the Operator. The policy is valid indefinitely until it is replaced by a new version. 14.3. The current version of the Free Access Policy is available on the Internet at <https://sensei.ua/>

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