

# Personal data processing policy

Marillion takes the security of data and our legal responsibilities around your personal information seriously. This document defines Marillion's policy regarding the processing of personal data collected via this website.

The policy was developed subject to the requirements of the Federal Law "On Personal Data" dated 27.07.2006 № 152-FZ (hereinafter - the "Law on Personal Data"), other laws and regulations of the Russian Federation on personal data.

## What personal data do we process?

The personal data we process as a result of your visit to our website depends on the data you provide to us. If you access our site but do not interact further with us, we will only process the data contained in cookies which are necessary to run our site (see 'Cookies' for more info). Should you decide to interact with us by, for example, submitting a request form, we will process the data you provide for the purposes stated on the form. Some fields (for example, your contact details) are mandatory as without them we will be unable to make further contact with you to answer your request.

## Use of personal data

We may process your personal data collected through our website for the purposes outlined below:

- **Contract entry and performance:** should you indicate an interest in becoming a client of Marillion we will use the personal data in order to take steps to enter into a contract for services with you. We may continue to use the data provided through our website in order to perform our duties under a contract with you.
- **Our legitimate interests:** we process personal data in order to run the business, including managing our relationship with you and fulfilling the duties imposed on us by federal laws,
- **Recruitment and personnel administration:** if you apply for a job through our website, we collect personal data from job applicants in order to recruit new employees.
- **Security, quality and risk management:** personal data may be processed in the context of maintaining security and within the scope of internal quality and risk analysis.
- **Direct marketing:** we may process personal data for direct marketing purposes to promote and develop our services and to provide you with information we think will be of interest to you. In all cases we will give you the opportunity to opt-out of our direct-marketing activities. Opt-out can be achieved by responding using the unsubscribe options contained within the information you have received or by contacting us.
- **Complying with legal requirements, regulations or a professional body of which we are a member of:** we are subject to legal, regulatory and professional obligations. We need to keep certain records to demonstrate that our services are provided in compliance with those obligations and those records may contain personal data.

All personal data submitted through this site may be used by us in an anonymised form to assess and improve the services delivered herein and for our wider business development activities.

## Who do we disclose personal data to?

From time to time, we may transfer or disclose your personal data to other entities of Marillion or to third parties for any of the purposes listed above, including to governmental and professional agencies and third parties who perform services on our behalf, such as web hosting providers, IT-providers, payment providers, customer relationship management providers.

When we disclose your personal data to third parties who perform services on our behalf, we ensure that such service providers use your data only in accordance with our instructions.

We may also disclose your personal data to third parties where we are required to do so by law, regulators or for the purposes of, or in connection with any legal proceedings, or otherwise for the purpose of establishing, exercising or defending our legal rights.

We do not sell or rent your personal data for any purpose.

## Data Subject Rights

You may exercise a number of rights over your data including:

- Accessing the personal data we hold about you
- Asking us to correct any of your personal data we hold which are inaccurate
- Request to have your personal data deleted
- Withdraw consent to our processing of your personal data (where we process your personal data based on consent)
- Put in place restrictions on our processing of your personal data
- Objecting to our processing of your personal data

We will handle all exercise of your data subject rights in accordance with the requirements of applicable privacy law. Should you wish to exercise any of your data subject rights or have any questions about this statement please contact us using our contact form.

If you are dissatisfied with the way we have handled your personal data and we are unable to resolve the issue for you and you are an EU citizen you may take the matter to your local supervisory authority responsible for data protection matters. The European Commission maintains a list of data protection supervisory authorities which can be found [here](#). In all other circumstances you may take the matter to the Roskomnadzor.

## Duration of Processing

We will hold your personal data on our systems for the longest of the following periods: (i) as long as is necessary for the purpose of which it was collected; (ii) any retention period that is required by law; or (iii) limitation period in which litigation or investigations might arise in respect of our services.

After the applicable retention period(s) have expired, personal data will be deleted or anonymized.

## Data Security

We ensure appropriate technical and organisational controls are in place to protect your personal data from loss, misuse, alteration and unintentional destruction, such as the use of anti-virus, firewalls, secure servers, password protection, physical access controls, two-factor authentication, detection of malfunctions and unauthorized data access.

Our personnel who have access to your personal data have been trained to maintain the confidentiality of such data. They will only be granted access to your personal data to the extent that they need this information to perform their duties properly. The persons who can consult your data are also bound by strict professional discretion.

Conditions to protect data to at least the same standard as we do are cascaded to all our contractors and suppliers.

Regular monitoring and testing of our security defences is carried out to ensure they continue to be effective against the latest threats.

Data transferred over the internet by us and through this website are protected using encryption technologies. No transaction carried out over the internet can ever be guaranteed to be secure.

## Children and our website

Marillion understands the importance of protecting children's privacy, especially in an online environment. Our sites are not intentionally designed for or directed at children. We do not knowingly collect or maintain information about anyone under the age of 18 through our website. If you are under 18 years of age you must obtain the consent of a parent or guardian to submit information via our website. Please ask them to review this information before you communicate with us.

## Cookies

Navigation on our website will result in cookies being placed on your computer. Cookies are small text files that are placed on your computer by the websites that you visit.

For further details, please consult our [Cookie Policy](#).

## Changes to this privacy statement

This privacy statement was last updated in 2022. We may amend it from time to time. Any changes will be published on this page, and we recommend you check here regularly to ensure you remain in agreement with our data processing activities.