

PERSONAL DATA PROCESSING POLICY OF CFI

1. General Provisions

1.1. This Personal Data Processing Policy (hereinafter referred to as the “Policy”) establishes the principles and conditions for personal data processing that CFI (hereinafter referred to as the “Operator”) must adhere to.

1.2. The Policy is developed in compliance with applicable data protection laws and regulations, including international standards where relevant.

1.3. The purpose of this Policy is to ensure the protection of the rights and freedoms of individuals when processing their personal data, including the right to privacy, personal and family confidentiality.

2. Key Definitions

2.1. Personal data — any information related directly or indirectly to an identified or identifiable individual (the data subject).

2.2. Personal data processing — any action (operation) or set of actions performed with personal data, whether using automated tools or not.

2.3. Personal data confidentiality — a mandatory requirement for the Operator to prevent personal data dissemination without the consent of the data subject or other lawful grounds.

3. Purposes of Personal Data Processing

CFI processes personal data for the following purposes:

- Fulfilling contractual obligations with clients and partners;
- Complying with applicable legal requirements;
- Conducting marketing and promotional activities;
- Informing users about company news, products, and services;
- Organizing events and other activities to promote CFI’s products and services.

4. Types of Collected and Processed Data

4.1. Within its activities, CFI collects and processes the following categories of personal data:

- Basic identification data: full name, date of birth;
- Contact details: phone number, email address;
- Marketing information: client preferences and interaction history (inquiries, requests);
- Other information: data voluntarily provided by the data subject.

4.2. CFI does not process special categories of personal data related to race, nationality, political opinions, religious or philosophical beliefs, or health conditions, except as required by applicable laws.

5. Principles of Personal Data Processing

5.1. Personal data processing is carried out on a lawful and fair basis.

5.2. Processing is limited to achieving specific, predetermined, and legitimate purposes.

5.3. Combining databases containing personal data processed for incompatible purposes is not allowed.

5.4. Only personal data relevant to the purposes of processing is subject to processing.

6. Rights of the Data Subject

The data subject has the right to:

- Obtain information about the processing of their personal data;
- Request the rectification, blocking, or deletion of their personal data if it is incomplete, outdated, inaccurate, or obtained unlawfully;
- Withdraw consent for personal data processing.

7. Measures to Ensure Personal Data Security

CFI implements necessary organizational and technical measures to protect personal data from unlawful or accidental access, destruction, alteration, blocking, copying, dissemination, and other unlawful actions.

8. Final Provisions

8.1. This Policy takes effect upon approval.

8.2. The Policy is subject to review and updating in case of changes in applicable laws or in the operations of CFI related to personal data processing.

8.3. Data subjects are informed about this Policy through its publication on the CFI website.