



PRIVACY AND PERSONAL DATA PROCESSING POLICY

1. GENERAL PROVISIONS

1.1. This Privacy and Personal Data Processing Policy (the “Policy”) outlines the procedures for collecting, processing, storing, using, transferring, and protecting personal data of individuals by Limited Liability Company “APISFERA” (the “Company,” “Operator,” or “Organization”).

Operator’s Details:

Full legal name: APISFERA Limited Liability Company

Short name: APISFERA LLC

Legal address: 109052, Russian Federation, Moscow, Nizhegorodsky Municipal District, Nizhegorodskaya Street, 70, Building 1, Room 5/1

OGRN: 1257700254921

INN: 9722099651

KPP: 772201001

Email: info@apisfera.ru

Website: <http://apisfera.ru>

1.2. This Policy is developed in accordance with Federal Law No. 152-FZ “On Personal Data,” Federal Law No. 149-FZ “On Information, Information Technologies and Protection of Information,” and other applicable Russian regulations.

1.3. This Policy aims to protect individuals’ rights and freedoms related to their personal data, including privacy and family life, and to define the procedures and safeguards applied during data processing in connection with environmental and educational activities.

1.4. This Policy applies to all personal data processed by the Organization, whether automatically or manually, if manual processing is functionally equivalent to automated processing.

1.5. By providing personal data, individuals unconditionally consent to this Policy and its processing terms.

1.6. If a data subject disagrees with this Policy, they must refrain from providing personal data or using the Organization’s services.

1.7. The Organization may update this Policy. The current version is available at: https://apisfera.ru/en/privacy_policy.pdf. Updates become effective upon publication unless stated otherwise.

2. TERMS AND DEFINITIONS

- Personal data: Any information relating to an identified or identifiable natural person (“data subject”).
- Data subject: The individual to whom personal data relates.
- Operator: A legal entity or individual that determines the purposes and means of processing personal data.
- Processing: Any operation performed on personal data, with or without automation (e.g., collection, storage, use, transfer, deletion).
- Provision: Disclosure of personal data to a specific party.
- Dissemination: Disclosure to an indefinite number of persons.
- Blocking: Temporary suspension of processing.
- Destruction: Making data unrecoverable.
- Information system: Databases and tools used for processing personal data.
- Cookies: Small files stored on a device that help identify users and enhance website functionality.
- Confidentiality: The obligation to prevent unauthorized disclosure of personal data.
- Combined processing: Processing performed both manually and through automated means.

3. LEGAL GROUNDS FOR PROCESSING

3.1. The Organization processes personal data based on the data subject’s consent for participation in environmental and educational programs.

3.2. Processing may also occur to perform or enter into a contract with the data subject, such as agreements related to hive installation, expeditions, or training programs.

3.3. Processing may occur without consent if necessary to protect the data subject’s life, health, or vital interests during environmental expeditions.

3.4. Personal data may also be processed to protect the legitimate interests of the Organization or third parties or to achieve socially significant goals in environmental protection, provided this does not override the rights and freedoms of the data subject.

4. CATEGORIES OF DATA SUBJECTS & DATA PROCESSED

4.1. The Organization processes personal data of:

- Participants in bee conservation and ecosystem restoration programs;
- Students of natural beekeeping courses;
- Expedition members in reserves and national parks;
- Clients installing beehives on their land;
- Website users and communication correspondents;
- Newsletter subscribers;
- Partner organizations and institutions.

4.2. The Organization may process:

- Full name, date and place of birth, gender, citizenship;
- Passport or ID details;
- Residential and temporary addresses;
- Contact details (phone numbers, email addresses);
- Banking information;
- Technical data (IP address, browser, OS, visit history, time stamps);
- Cookies and similar identifiers;
- Other data as required for the purposes of processing.

4.3. The Organization does not process special categories of personal data (e.g., ethnicity, beliefs, private life) unless required by Russian law.

4.4. Biometric data is not processed except when mandated by law.

5. METHODS OF OBTAINING DATA

5.1. The Organization collects personal data:

- Directly from data subjects (in-person, forms);
- Via phone or email communication;
- Automatically through the website (including cookies);
- During contract execution;
- From public sources;
- From third parties, where permitted by law or with consent;
- By other lawful means.

5.2. Where legally required, the Organization informs data subjects of:

- The purposes and legal basis for processing;
- The methods and duration of processing;
- Their data rights.

6. PURPOSES OF PERSONAL DATA PROCESSING

6.1. Personal data is processed for the organization and implementation of environmental programs aimed at preserving honeybees and restoring natural ecosystems, including the creation and maintenance of “bee return points” in various regions of Russia.

6.2. Processing is carried out to provide educational services in the field of nature-based beekeeping, including five-day training programs with hands-on participation in nature reserves, training in the installation of bee hives, and creating sustainable conditions for wild bee survival.

6.3. The data is used to organize environmental expeditions and educational tourism within APIDOM, including participant accommodation, safety measures, honey tasting events, and exploration of bee life in natural ecosystems.

6.4. Personal data is processed to maintain a registry of project participants, track hive installation outcomes, monitor wild bee population recovery at established “return points,” and compile reports on the Organization’s activities.

6.5. Processing is necessary to inform interested parties about the Organization’s activities, new environmental initiatives, educational programs, and opportunities to participate in ecosystem restoration projects via newsletters and publications.

6.6. The data is also used to ensure the functioning of the Organization’s website, personalize content in line with visitors’ interests in environmental topics, and analyze the effectiveness of informational materials related to beekeeping and conservation efforts.

7. COOKIE USAGE

7.1. The Organization’s website uses cookies to enable functionality, analyze traffic, personalize content, and improve user experience.

7.2. Users may control cookie usage via browser settings. Disabling cookies may reduce site functionality.

7.3. Cookies do not directly identify users but may contain device or browser-specific identifiers.

8. PROCESSING PROCEDURE

- 8.1. The Organization processes personal data lawfully and only for predefined purposes related to environmental and educational activities.
- 8.2. Only relevant data is processed, and its volume must correspond to the purposes of processing.
- 8.3. The Organization ensures accuracy, adequacy, and relevance of data.
- 8.4. Processing operations may include: collection, recording, systematization, accumulation, storage, updating, retrieval, use, transfer, blocking, deletion, and destruction.
- 8.5. Processing is performed both manually and with automation tools.

9. DATA TRANSFER TO THIRD PARTIES

- 9.1. Personal data may be shared with third parties only with consent or where permitted by law.
- 9.2. Transfers may occur:
 - With consent (e.g., for participation in joint environmental projects);
 - As required by Russian law (e.g., interaction with government agencies);
 - As part of collaboration with reserves and partners, provided they comply with this Policy.
- 9.3. Transfers may be made to protect the rights of the Organization or third parties, including in cases of contract breaches or project-related harm.

10. STORAGE TERMS

- 10.1. Personal data is retained only as long as necessary for the stated purposes unless otherwise provided by law, consent, or agreement.
- 10.2. Once the purpose is fulfilled or consent is withdrawn, processing ceases and data is deleted within 30 days unless otherwise required.
- 10.3. If data cannot be immediately deleted, it is blocked and then destroyed within six months or as prescribed by law.
- 10.4. Data is stored in an identifiable form no longer than required for processing.

11. DATA SECURITY MEASURES

- 11.1. The Organization implements legal, organizational, and technical safeguards to protect personal data against unauthorized access, destruction, alteration, or leakage.
- 11.2. Security measures include threat identification and modeling tailored to the processing of environmental program participants' data.
- 11.3. Organizational measures include:
 - Appointing a responsible officer;
 - Restricting access to authorized personnel;
 - Training personnel on legal requirements;
 - Maintaining access logs;
 - Monitoring data systems;
 - Responding to incidents;
 - Ensuring integrity and recovery of compromised data.
- 11.4. Technical measures include:
 - Preventing unauthorized access;
 - Intrusion detection and prevention;
 - Data integrity and confidentiality assurance;
 - System recovery capabilities;
 - Ongoing monitoring of data security.

12. DATA SUBJECT RIGHTS

- 12.1. Data subjects may request:
 - Confirmation of processing;
 - Legal basis, purposes, and methods used;
 - Operator identity and location;
 - Categories of data and recipients;
 - Retention periods and data sources;
 - How to exercise their rights.
- 12.2. Data subjects may request correction, blocking, or deletion of inaccurate, outdated, unlawfully obtained, or unnecessary data.
- 12.3. Consent may be withdrawn via written request to info@apisfera.ru or the Organization's postal address.
- 12.4. Data subjects may lodge complaints with the competent supervisory authority or a court.

13. OPERATOR OBLIGATIONS

- 13.1. The Organization must provide processing information to data subjects upon request as required by law.

- 13.2. Refusals to provide data must be justified and consider the nature of environmental processing.
- 13.3. The Organization must prove that valid consent was obtained if legally required.
- 13.4. The Organization must stop processing upon a lawful request unless otherwise permitted (e.g., long-term projects).
- 13.5. Violations must be corrected promptly, and the data subject informed.

14. LIABILITY

- 14.1. Individuals violating Russian data protection laws may face civil, administrative, criminal, or disciplinary responsibility.
- 14.2. The Organization is accountable for compliance with personal data legislation, including as applied to environmental and educational projects.

15. FINAL PROVISIONS

- 15.1. This Policy remains valid until replaced. Disputes shall be resolved through negotiation or by competent Russian courts.
- 15.2. If any provision is found invalid, the remaining provisions remain effective.
- 15.3. The Organization may amend this Policy to reflect changes in law or environmental project activities.