

## **Privacy Notice for RuDALLE website**

This Privacy Notice (Notice) tells you what to expect us to do with your personal information when you attend RuDALLE website (thereafter: site, website, our site, this site).

This Notice is layered. So, if you wish, you can easily select the particular point and see what we do with your data.

### **1. Personal data controller details**

1.1. This website is owned by Sberbank. Sberbank defines purposes and measures of data processing regarding this website and, therefore, acts as data controller.

1.2. Personal data processing at Sberbank is regulated by Bank's Privacy Policy. The present Notice intends to provide brief and plain explanation relevant solely for this site.

1.3. In case we rely on third parties' services to collect and process your personal data (such as cookies and similar technologies), these third parties store your personal data in accordance with their own policies.

1.4. All your queries about your data processing regarding this website you can address to Sber AI DPO [dpoai@sberbank.ru](mailto:dpoai@sberbank.ru). We try to provide you with response timely, as soon as possible, but in any case, within 30 days.

You can find more information about the role of the DPO [here](#) from the EDPB (WP29), [here](#) from the ICO or [here](#) from la CNIL.

### **2. What's your personal data?**

2.1. Generally, your personal data are any data connected to you (art. 2 Convention CE 108, art. 4(1) GDPR, s. 3(2) UK Data Protection Act 2018, art. 3(1) Federal Law N 152, art. 4 PIPL, Schedule I(3) DIFC Data Protection Law N 5 2020, s. 68 ADGM Data Protection Regulation 2021).

### **3. Does this site collect your personal data?**

3.1. This site itself does not collect personal data, but we use cookies and similar technologies. Third parties provide us with such technologies. These parties collect and process your data in accordance with their own policies.

3.2. More about cookies and similar technologies, their providers and ways in which we use such technologies: our Cookie Policy for RuDALLE (website name) website.

3.3. When you browse this site, we receive following information about you:

- Your User Agent (browser peculiarities, such as: device type (e.g. tablet, laptop, smartphone), device mark and model, OS type, browser type);
- Information about quantity of unique or repetitive visitors of this site;
- Your age;
- Your gender;
- Your country, city, town, urban or rural area (based on your IP);
- Location (if your device and browser settings allow to track your location);
- History of your navigation on our site, including address from which you come to our site.

3.3.1. We receive this information as aggregated statistics; Normally, it is impossible for us to identify you directly (by name, phone number, ID, etc.); Although, we are able to single out your data from other users' data (indirect identification), we normally do not pursue the purpose to identify you, track you or link any data with you.

3.3.2. Subsequently we store and process anonymised aggregated statistics in the form which is technically impossible to link with you as well as single out your information from dataset. Hence, this subsequent information cannot be any more considered as personal data.

3.4. In a case you send us any queries, we receive your personal data directly from you. In such a case we also can ask you to provide us with some additional information which may be necessary to perform your query. We do not process or

store this information longer than it is necessary to perform your request. When the request is completed, we immediately and irrevocably delete all information about you connected with this query.

3.5. We do not collect and process any sensitive personal data or personal data of any special categories, such as genetic or biometric data, data concerning health or data concerning a natural person's sex life or sexual orientation, information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, or criminal convictions or offences.

#### **4. Why do we collect and process personal data?**

4.1. Information mentioned in the p. 3.3. of this Notice is necessary for us to:

- enable core functionality of the site such as security, network management, and accessibility;

- improve our website by collecting and reporting information on how you use it;

- collect and analyse statistics of visiting our site and analyse our audience to improve our content and provide you with content you are interested in.

4.2. Information mentioned in the p. 3.4. of this Notice is necessary for us to:

- process your request and response you promptly;

- exercise your rights as data subject properly in accordance with law and in timely manner.

4.3. We do not pursue any marketing or advertising purposes or targeting or profiling users.

#### **5. What are the legal grounds we rely on processing your personal data?**

5.1. We collect and process information mentioned in the p. 3.3. via analytical cookies and similar technologies on the ground of your prior explicit informed and freely given consent (art. 6(1)(a) GDPR, art. 6(1)(1) Federal Law N 152, art. 13(1) PIPL, art. 10(1)(a) DIFC Data Protection Law N 5 2020, s. 5(1)(a) ADGM Data Protection Regulation 2021).

5.1.1. When you visit this site for the first time, we provide you with the choice via a pop-up. You can reject all cookies, except essential ones, or allow us to use analytical cookies. If you reject analytical cookies, a pop-up appears every further time you visit our website, and, therefore, you have to make your choice every time. If you allow analytical cookies, our site memorises you and your choice, so you do not have to see a pop-up again.

5.1.2. If you want to change your preferences about cookies, you can do it anytime here.

5. We process information mentioned in the p. 3.4. based on the ground of performance of legal duty imposed on us as data controller by applicable law (art. 6(1)(c) GDPR, art. 6(1)(2) Federal Law N 152, art. 13(3) PIPL, art. 10(1)(c) DIFC Data Protection Law N 5 2020, s. 5(1)(c) ADGM Data Protection Regulation 2021).

## **6. How long do we store your personal data?**

6.1. Normally, we do not retain information about you in the form that allow link this information with you or single out information regarding you from dataset.

6.2. In a case you send us any queries (p. 3.4.), we process the information linked to your request no longer than it is necessary to perform your request. When the request is completed, we immediately and irrevocably delete all information about you connected with this query.

6.3. In case we rely on third parties' services to collect and process your personal data (such as cookies) these third parties store your personal data in accordance with their own policies.

## **7. Do we disclose your personal data to third parties?**

7.1. Normally, we do not disclose your personal data to third parties.

7.2. In case we rely on third parties' services to collect and process your personal data (such as cookies) these third parties store your personal data in accordance with their own policies.

7.3. We will not share your information with any third parties for the purposes of direct marketing.

7.4. In some circumstances we are legally obliged to share information with state authorities. Normally we can provide authorities only with anonymised statistics because it is technically impossible to find your data in anonymised aggregated dataset. In any case we share information with state authorities only being sure of lawfulness and validity of the request. We do not execute unlawful requests. We minimise information provided to state authorities and limit it to only strictly prescribed by law degree.

7.5. If we provide links to websites of other organisations, this Privacy Notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on other websites you visit.

## **8. Do we transfer your personal data abroad?**

8.1. We don't transfer your personal data abroad. All processing takes place in Russia. All our servers as well as other equipment and all our staff are located in Russia. According to Russian law (art. 18(5) Federal Law N 152) your data are localised in Russia.

## **9. What are your rights?**

9.1. As data subject you have a number of rights under data protection law. The rights available to you depend on our reason for processing your information and applicable law:

9.1.1. Your right to access your data

(art. 15 GDPR, art. 14 Federal Law N 152, art. 44 and 45 PIPL, art. 33(1) DIFC Data Protection Law N 5 2020, s. 13 ADGM Data Protection Regulation 2021)

You have the right to ask us for copies of your personal information. Normally we cannot provide you with copy of your data we process because it is technically impossible to single out your data from an anonymised aggregated dataset.

You can read more about this right here from the [ICO](#) and [here](#).

### 9.1.2. Your right to rectification your data

(art. 16 GDPR, art. 14 Federal Law N 152, art. 46 PIPL, art. 33(1) DIFC Data Protection Law N 5 2020, s. 14 ADGM Data Protection Regulation 2021)

You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete. Normally we cannot rectify your data we process because it is technically impossible to single out your data from an anonymised aggregated dataset.

You can read more about this right here from the [ICO](#).

### 9.1.3. Your right to withdraw consent

(art. 7(3) GDPR, art. 14 Federal Law N 152, art. 15 PIPL, art. 32 DIFC Data Protection Law N 5 2020, s. 6(7) ADGM Data Protection Regulation 2021)

You have the right to withdraw your consent to processing your data if such a processing is based on your consent. You can manage your consent any time here.

You can read more about this right here from the .

### 9.1.4. Your right to erasure (“right to be forgotten”)

(art. 17 GDPR, art. 14 Federal Law N 152, art. 47 PIPL, art. 33(2) DIFC Data Protection Law N 5 2020, s. 15 ADGM Data Protection Regulation 2021)

You have the right to ask us to erase your personal information in certain circumstances, such as, if data are no longer needed for our purposes, or we process your data without any valid legal grounds or anyway unlawfully, or you have withdrawn your consent (if processing was based on your consent), or we obtained your data when you were a child, or in other circumstances according to applicable law. Normally we cannot delete your data because it is technically impossible to single out your data from an anonymised aggregated dataset.

You can read more about this right here from the [ICO](#) and here from the .

### 9.1.5. Your right to restriction of processing

(art. 18 GDPR, art. 14 Federal Law N 152, art. 44 PIPL, art. 35 DIFC Data Protection Law N 5 2020, s. 16 ADGM Data Protection Regulation 2021)

You have the right to ask us to restrict the processing of your information in certain circumstances.

[You can read more about this right here](#) from the [ICO](#).

#### 9.1.6. Your right to object to processing

(art. 21 GDPR, art. 44 PIPL, art. 34 DIFC Data Protection Law N 5 2020, s. 19 ADGM Data Protection Regulation 2021)

You have the right to object to processing if we process your information based on our legitimate interests. We do not rely on legitimate interest for processing your personal data regarding this site.

[You can read more about this right here](#) from the [ICO](#).

#### 1.9.7. Your right to data portability

(art. 20 GDPR, art. 45 PIPL, art. 37 DIFC Data Protection Law N 5 2020, s. 18 ADGM Data Protection Regulation 2021)

This right is unapplicable in the context of this website.

[You can read more about this right here](#) from the [ICO](#) and [here](#) from the .

1.9.8. Your right not to be subject of automated decision-making, including profiling

(art. 22 GDPR, art. 16 Federal Law N 152, art. 38 DIFC Data Protection Law N 5 2020, s. 20 ADGM Data Protection Regulation 2021)

You have the right not to be subject of automated decision-making, including profiling. We do not pursue automated decision-making, including profiling.

[You can read more about this right here](#) from the [ICO](#) and [here](#) from the .

#### 1.9.9. Your right to lodge a complaint

(art. 77 GDPR, art. 17 Federal Law N 152, art. 50 PIPL, art. 60 DIFC Data Protection Law N 5 2020, s. 57 ADGM Data Protection Regulation 2021)

You have the right to lodge a complaint with the supervising authority [Roskomnadzor](#).

You can address any questions about your rights as data subject to our DPO via [dpoi@sberbank.ru](mailto:dpoi@sberbank.ru). We try to provide you with response timely, as soon as possible, but in any case, within 30 days.





## **Cookie (and Similar Technologies) Policy**

### **for RuDALLE website**

Utilising cookies and similar technologies at [Sberbank](#) is regulated by Bank's [Cookie Policy](#).

This Cookie (and Similar Technologies) Policy (Policy) tells you what to expect us to use cookies and similar technologies when you attend [ruDALLE] (website name) website (hereafter: site, website, our site, this site).

This Policy is layered. So, if you wish, you can easily select the particular point and see what we do with your data.

Cookies are small text files that are placed on your device by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site.

Similar technologies is an umbrella term used for fingerprinting (using certain characteristics to identify devices), scripts, tracking pixels, plugins and other trackers. More about cookies and similar technologies from [ICO](#) and [CNIL](#).

### **1. What cookie and similar technologies do we use?**

The table below explains what cookies and similar technologies we use and why.

	<b>Cookie</b>	<b>Purpose</b>
1.1.	Cookie preference	This cookie is used to remember a user's choice about cookies on the website. Where users have previously indicated a preference, that user's preference will be stored in this cookie.
1.2.	Language selection	This cookie is used to remember any selection a user has made about language on the website, using the language selector, so that the site will be shown in their chosen language when returning to the site.
1.3.	Universal Analytics ( <a href="#">Yandex Metrika</a> )	These cookies are used to collect information about how visitors use our website. We use the information to compile reports and help us improve the website. The cookies collect information in a way that does not directly identify anyone, including the number of visitors of the website, where visitors came to the website from, and the pages they visited. <a href="#">Read more about these cookies.</a>

### **2. Why are we able to use cookies and similar technologies?**

2.1. The cookies and similar technologies mentioned in p. 1.1.,1.2. are essential cookies. These are strictly necessary to maintain correct and safe functioning of this site.

2.1.1. Essential cookies and similar technologies do not collect your personal information, because cannot identify you as well as do not store any information about you. When you leave our site, all essential cookies and similar technologies are immediately automatically and irrevocably erased from your browser.

2.1.2. We do not need your consent to run essential cookies and similar technologies and process information which they collect.

2.1.3. Essential cookies and similar technologies enable core functionality of our website such as security, network management, and accessibility. You may disable these by changing your browser settings, but this may affect the website functions.

2.2. Analytical cookies.

The cookies mentioned in p. 1.3. are analytical cookies.

2.2.1. Analytical cookies help us improve our website by collecting and reporting information on how you use it.

2.2.2. Analytical cookies provide us with the following information:

- Your User Agent (browser peculiarities, such as: device type (e.g. tablet, laptop, smartphone), device mark and model, OS type, browser type);
- Information about quantity of unique or repetitive visitors of this site;
- Your age;
- Your gender;
- Your country, city, town, urban or rural area (based on your IP);
- Location (if your device and browser settings allow to track your location);
- History of your navigation on our site, including address from which you come to our site.

2.2.3. We receive this information as aggregated statistics; Normally, it is impossible for us to identify you directly (by name, phone number, ID, etc.); Although, we are able to single out your data from other users' data (indirect

identification), we normally do not pursue the purpose to identify you, track you or link any data with you.

2.2.4. Subsequently we store and process anonymised aggregated statistics in the form which is technically impossible to link with you as well as single out your information from dataset. Hence, this subsequent information cannot be any more considered as personal data.

2.2.5. We collect and process information mentioned in the p. 2.2.2. via analytical cookies on the ground of your prior explicit informed and freely given consent.

2.2.6. When you visit this site for the first time, we provide you with the choice via a pop-up. You can reject all cookies, except essential ones, or allow us to use analytical cookies. If you reject analytical cookies, a pop-up appears every further time you visit our website, and, therefore, you have to make your choice every time. If you allow analytical cookies, our site memorises you and your choice, so you do not have to see a pop-up again.

2.2.7. If you want to change your preferences about cookies, you can do it anytime here.