

POLICY REGARDING THE PROCESSING AND PROTECTION OF PERSONAL DATA AT NEUROSOFT LLC

1. General Provisions

1.1. This policy (hereinafter referred to as the Policy) regarding the processing and protection of personal data at LLC "Neurosoft" (hereinafter referred to as the LLC, the Operator) has been developed in accordance with the requirements of Part 2 of Article 18.1 of the Federal Law dated July 27, 2006, No. 152-FZ "On Personal Data" (hereinafter referred to as 152-FZ), other subordinate acts, and normative documents of regulatory and supervisory bodies of the Russian Federation.

1.2. This Policy determines the goals, content, procedure for processing, and measures aimed at protecting the personal data of individuals or their legal representatives (personal data subjects) in connection with the implementation of labor relations, conducting pre-contractual work, concluding contracts and fulfilling contractual obligations, information technology support of the LLC's activities, exercising the rights and legitimate interests of the LLC, exercising and performing functions, powers, and duties imposed by the legislation of the Russian Federation, and during the LLC's implementation of its statutory and economic activities.

1.3. Personal data belongs to the category of confidential information and must be protected from unauthorized, including accidental, access to it.

1.4. The LLC and other persons who have gained access to personal data are obliged not to disclose to third parties and not to distribute personal data without the consent of the personal data subject, unless otherwise provided by the current legislation of the Russian Federation.

1.5. The processing of personal data in the LLC is carried out in compliance with the principles and conditions provided for by this Policy and the legislation of the Russian Federation in the field of personal data.

1.6. The action of the Policy extends to all processes related to the processing of personal data.

1.7. The Policy is mandatory for familiarization and execution by all persons admitted to the processing of personal data.

1.8. Based on the order of the Federal Service for Supervision of Communications, Information Technology and Mass Media, the LLC is included in the register of operators carrying out the processing of personal data (hereinafter referred to as the Operator).

1.9. Revision and updating of this Policy are carried out upon changes in the current legislation of the Russian Federation in the field of personal data, upon changes in the purposes of processing or categories of personal data subjects, upon changes in the list of persons processing personal data on behalf of the LLC, and based on the results of an analysis of the relevance, sufficiency, and effectiveness of the measures used to ensure the security of personal data during their processing in personal data information systems.

1.10. Unlimited access to the current version of the Policy is provided to subjects by posting its electronic version on the official website of the LLC on the Internet network at the address: <https://neurosoft.com/en> (and other information resources and services of the LLC on the "Internet" network), as well as at security posts in paper form on the territory of the LLC.

1.11. In all other matters not provided for by this Policy, the LLC is guided by the provisions of the current legislation of the Russian Federation.

2. Terms and Definitions

2.1. **Personal data** – any information relating to a directly or indirectly determined or determinable natural person (personal data subject).

2.2. **Personal data permitted by the personal data subject for distribution** – personal data, access to which is provided to an unlimited number of persons by the personal data subject by giving consent to the processing of personal data permitted by the personal data subject for distribution in the manner provided for by this Federal Law.

2.3. **LLC (Operator)** – Limited Liability Company "Neurosoft", including structural subdivisions and their employees (TIN 37290024501, PSRN 1033700080721, located at the address: 153032, Russian Federation, Ivanovo, Voronina St., 5);

2.4. **Operator** – a state body, municipal body, legal entity or individual, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data subject to processing, and actions (operations) performed with personal data.

2.5. **Processing of personal data** – any action (operation) or set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.6. **Processor** – a state body, municipal body, legal entity or individual carrying out the processing of personal data on behalf of the operator on the basis of a concluded agreement, including a state or municipal contract, or the operator's assignment.

2.7. **Automated processing of personal data** – processing of personal data with the help of computer technology.

2.8. **Distribution of personal data** – actions aimed at disclosing personal data to an indefinite circle of persons.

2.9. **Provision of personal data** – actions aimed at disclosing personal data to a specific person or a specific circle of persons.

2.10. **Blocking of personal data** – temporary termination of the processing of personal data (except for cases where processing is necessary to clarify personal data).

2.11. **Destruction of personal data** – actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which material carriers of personal data are destroyed.

2.12. **Threat to the security of personal data** – a set of conditions and factors creating a danger of unauthorized, including accidental, access to personal data, which may result in the destruction, modification, blocking, copying, provision, distribution of personal data, as well as other illegal actions during their processing in the personal data information system.

2.13. **Level of protection of personal data** – a comprehensive indicator characterizing the requirements, the fulfillment of which ensures the neutralization of certain threats to the security of personal data during their processing in personal data information systems.

2.14. Depersonalization of personal data – actions as a result of which it becomes impossible to determine the ownership of personal data by a specific personal data subject without using additional information.

2.15. Personal data information system – a set of personal data contained in databases and information technologies and technical means ensuring their processing.

2.16. Cross-border transfer of personal data – transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual, or a foreign legal entity.

2.17. Person responsible for organizing the processing of personal data – an official appointed by the order of the president of the LLC, organizing the adoption of legal, organizational, and technical measures in order to ensure the proper performance of functions for organizing the processing of personal data in accordance with the provisions of the legislation of the Russian Federation in the field of personal data.

2.18. Confidentiality of personal data – a mandatory requirement for the LLC or other person who has gained access to personal data not to disclose to third parties and not to distribute personal data without the consent of the personal data subject or the presence of another legal basis provided for by federal law.

3. Purposes and Legal Grounds for Processing Personal Data

3.1. The processing of personal data is carried out by the LLC in fulfillment of the functions, powers, and duties imposed by the legislation of the Russian Federation on the LLC, including for the provision of personal data to state authorities, the Social Fund of Russia, the Federal Compulsory Medical Insurance Fund, the Federal Tax Service of the Russian Federation, as well as to other state bodies.

3.2. Personal data is processed in the LLC for the following purposes:

- 3.2.1. Regulation of relations with employees (assistance in employment, maintenance of personnel (including electronic) document management, bookkeeping, training and promotion, ensuring personal safety, monitoring the quantity and quality of work performed, ensuring the safety of property, payment of wages and other deductions due to the employee, sending employees on business trips to conduct negotiations, participate in exhibitions, seminars, conferences, holding corporate events, forming reference materials, posting information on information resources and printed publications of the operator, issuing an electronic signature and a machine-readable power of attorney, providing access to resources and services);
- 3.2.2. Regulation of relations with clients and counterparties (conducting pre-contractual work, concluding and executing contracts, processing orders, payment and release of finished products, purchasing components, after-sales service, providing technical support, receiving feedback to improve the quality of manufactured products);
- 3.2.3. Conducting conferences, seminars, webinars, lectures, and training courses for clients (potential clients) on working with manufactured products at the LLC site or using video conferencing services via the "Internet" network;
- 3.2.4. Regulation of activities under civil law contracts (performance of work (services) in the interests of the LLC);
- 3.2.5. Regulation of relations with partners (dealers, agents) for the sale of manufactured products, provision of technical support and after-sales service;

- 3.2.6. Information technology support of the LLC's activities using the information and telecommunication network "Internet" (conducting marketing research, interaction in promoting goods, works, services on the market);
- 3.2.7. Provision of services to clients (client representatives) in electronic form for providing access to information resources and services of the LLC (granting non-exclusive rights to use computer programs and databases) via the information and telecommunication network "Internet", including by providing remote access to them;
- 3.2.8. Recruitment of personnel (applicants) to fill vacant positions;
- 3.2.9. Ensuring the passage of industrial or pre-diploma practice by students at the production base of the LLC in accordance with agreements concluded between the LLC and higher educational institutions;
- 3.2.10. Ensuring the access control regime to the territory of the LLC;
- 3.2.11. Interaction with representatives of state organizations and supervisory bodies, in the event of their appeal with requests to the address of the LLC, as well as during the implementation of planned (unscheduled) inspections or conducting audits of the LLC's compliance with current legislation, regulatory documents of regulatory and supervisory bodies of the Russian Federation.
- 3.2.12. Interaction with other persons (applicants) when processing requests.

3.3. The legal grounds for processing personal data in the LLC are:

- The Constitution of the Russian Federation.
- The Civil Code of the Russian Federation.
- The Tax Code of the Russian Federation.
- The Labor Code of the Russian Federation.
- Federal Law of 27.07.2006 No. 152 "On Personal Data".
- Federal Law of 27.07.2006 No. 149 "On Information, Information Technologies and Information Protection".
- Federal Law of 01.04.1996 No. 27-FZ "On Individual (Personified) Accounting in the Compulsory Pension Insurance System".
- Federal Law of 06.12.2011 No. 402-FZ "On Accounting".
- Federal Law of 28.03.1998 No. 53-FZ "On Military Duty and Military Service".
- Decree of the Government of the Russian Federation of 15.09.2008 N 687 "On Approval of the Regulation on the Specifics of Processing Personal Data Carried Out Without the Use of Automation Tools".
- Charter of the LLC.
- Other by-laws and normative legal documents of regulatory and supervisory bodies of the Russian Federation.

4. Principles and Conditions for Processing Personal Data

4.1. The processing of personal data in the LLC is carried out based on the following principles:

- Availability of legal grounds for processing personal data.

- Limitation of processing of personal data to the achievement of specific, predetermined, and legitimate goals.
- Inadmissibility of combining databases containing personal data, the processing of which is carried out for purposes incompatible with each other.
- Processing only those personal data that meet the purposes of their processing.
- Compliance of the content and volume (inadmissibility of redundancy) of processed personal data with the stated purposes of processing.
- Ensuring the accuracy of personal data, their sufficiency, and in necessary cases, relevance in relation to the purposes of processing personal data.
- Storage of personal data is carried out in a form that allows determining the subject of personal data, no longer than required by the purposes of processing personal data, if the storage period for personal data is not established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor.

4.2. Processing of personal data in the LLC may be carried out in the following cases:

- Processing of personal data is carried out with the consent of the personal data subject to the processing of his personal data;
- Processing of personal data is necessary to achieve the goals provided for by an international treaty of the Russian Federation or law, for the implementation and performance of functions, powers, and duties imposed by the legislation of the Russian Federation on the operator;
- Processing of personal data is carried out in connection with the participation of the personal data subject in constitutional, civil, administrative, criminal proceedings, proceedings in arbitration courts (for the execution of a judicial act in accordance with the legislation of the Russian Federation on enforcement proceedings);
- Processing of personal data is necessary for the exercise of powers of federal executive bodies, bodies of state extra-budgetary funds, executive bodies of state power of the constituent entities of the Russian Federation, local self-government bodies, and functions of organizations participating in the provision of state and municipal services respectively;
- Processing of personal data is necessary for the execution of an agreement, to which the personal data subject is a party or a beneficiary or guarantor, as well as for concluding an agreement on the initiative of the personal data subject or an agreement under which the personal data subject will be a beneficiary or guarantor. The agreement concluded with the personal data subject cannot contain provisions limiting the rights and freedoms of the personal data subject, establishing cases of processing personal data of minors, unless otherwise provided by the legislation of the Russian Federation, as well as provisions allowing inaction of the personal data subject as a condition for concluding the agreement;
- Processing of personal data is necessary to protect the life, health, or other vital interests of the personal data subject if obtaining the consent of the personal data subject is impossible;
- Processing of personal data is necessary for the exercise of the rights and legitimate interests of the Operator or third parties or for the achievement of socially significant goals, provided that the rights and freedoms of the personal data subject are not violated;

- Processing of personal data is necessary for carrying out scientific, literary, or other creative activities, provided that the rights and legitimate interests of the personal data subject are not violated;
- Processing of personal data is carried out for statistical or other research purposes, subject to mandatory depersonalization of personal data;
- Processing of personal data subject to publication or mandatory disclosure in accordance with the legislation of the Russian Federation is carried out.

4.3. The processing of personal data may be entrusted to a third party (hereinafter – the Processor), with the consent of the personal data subject, unless otherwise provided by the legislation of the Russian Federation, on the basis of an agreement concluded with this person and the assignment of the Operator.

4.4. At the same time, the Processor is obliged to comply with the principles and rules for processing personal data provided for by 152-FZ, maintain the confidentiality of personal data, and take necessary measures aimed at ensuring their security.

4.5. The Operator's assignment must define:

- List of personal data;
- List of actions (operations) with personal data that will be performed by the Processor;
- Purposes of processing;
- The obligation of the Processor to comply with the confidentiality of personal data, requirements provided for by Part 5 of Article 18, Article 18.1, Article 19, and Part 3 of Article 21 of 152-FZ, as well as the right of the Operator to request and receive from the Processor documents and other information confirming the Processor's fulfillment of the established measures and requirements.

4.6. The Processor carrying out the processing of personal data on behalf of the Operator is not required to obtain the consent of the subject for the processing of his personal data.

4.7. In the event that the Operator entrusts the processing of personal data to a Processor, the Operator bears responsibility to the personal data subject for the actions of the Processor, and the Processor carrying out the processing of personal data on behalf of the Operator bears responsibility to the Operator.

4.8. In the event that the Operator entrusts the processing of personal data to a Processor who is a foreign individual or a foreign legal entity, the Operator and the Processor bear responsibility to the personal data subject for the actions of such Processors.

4.9. For the purposes of information support, publicly available sources of personal data (including directories, address books) may be created in the LLC.

4.10. With the written consent of the personal data subject, his surname, first name, patronymic, year and place of birth, address, subscriber number, information about the profession, and other personal data reported by the personal data subject may be included in publicly available sources of personal data.

4.11. Employees of the LLC admitted to the processing of personal data are obliged to:

- Know and strictly strictly comply with the provisions of the legislation of the Russian Federation in the field of personal data, this Policy, local acts of the LLC regarding the processing and security of personal data;

- Process personal data only within the framework of performing their official duties;
- Ensure the confidentiality and security of processed personal data;
- Not disclose to third parties and not distribute personal data without the consent of the personal data subject, unless otherwise provided by federal legislation;
- Report actions of other persons that may lead to a violation of the provisions of this Policy or known facts of violation of the requirements of this Policy to the Person responsible for organizing the processing of personal data.

5. Categories of Subjects and Composition of Processed Personal Data

5.1. The LLC processes personal data of the following categories of personal data subjects:

Category of subjects	Composition of processed data
Individuals currently or previously in labor and other civil-law relations with the LLC, and (or) their legal representatives (employees, dismissed employees, close relatives of employees and (or) dismissed employees)	Surname, first name, patronymic (if any); date of birth; gender; citizenship; place of birth; marital status; social status; property status, income; registration address and place of residence; phone numbers, email addresses, identifiers in social networks and messengers; SNILS; TIN; identity document data; data of a document proving identity outside the Russian Federation; driver's license data; attitude to military duty, military registration information; marriage certificate; information on name change; information about children, including the child's birth certificate; information about dependent relatives; pension and medical insurance data; information about social and other benefits; information about awards and incentives, honorary titles, state and departmental awards; information about disability; information about tax benefits; information about writs of execution and alimony payments; information about wages and other income received in the performance of labor duties; details for transferring funds (bank card number, settlement account number, personal account number); information about education, name of the educational institution; profession, position, department; information about labor

Category of subjects	Composition of processed data
	<p>activity (including length of service, data on current employment indicating the name and settlement account of the organization); information about hiring, transfer, dismissal; photo and video image; training results, testing; SAWC results; information about advanced training, completed training, confirming certificates and identifiers; information about vacations; information about categories for bonuses, coefficients and amounts of bonuses; personnel number; date of taking office; results of conducted assessment activities; information about the presence/absence of a criminal record (if there are legal grounds); information about previous places of work and length of service; electronic signature and machine-readable power of attorney data; other information that the subject wished to report about himself and which meets the purpose of processing indicated in clause 3.2.1 of this Policy</p>
<p>Individuals (employees of clients and counterparties) during pre-contractual work, for the conclusion and fulfillment of contractual obligations</p>	<p>Surname, first name, patronymic (if any); email address; phone number; name of the organization, profession, position; country, location address, postal address, organization details; other information that the subject wished to report about himself and which meets the purpose of processing indicated in clause 3.2.2. of this Policy</p>
<p>Individuals performing works (services) in the interests of the LLC under GPC contracts</p>	<p>Surname, first name, patronymic (if any); passport data or other identity document; SNILS; TIN; work permit or patent, when concluding an agreement with a citizen of another state; other information that the subject wished to report about himself and</p>

Category of subjects	Composition of processed data
	which meets the purpose of processing indicated in clause 3.2.3. of this Policy
Individuals, listeners of lectures, seminars, webinars, conferences, training courses conducted by the LLC on working with LLC products	Surname, first name, patronymic (if any); email address; phone number; nickname in messenger; name of the organization, profession, position; country, location address, postal address, organization details; other information that the subject wished to report about himself and which meets the purpose of processing indicated in clause 3.2.4. of this Policy
Individuals (representatives of legal entities and individual entrepreneurs) who are representatives of the LLC on the basis of concluded agreements (agents, dealers)	Surname, first name, patronymic (if any); email address; phone number; name of the organization, profession, position; country, location address, postal address, organization details; identity document data; SNILS; TIN; details for transferring funds (settlement account number; personal account number); other information that the subject wished to report about himself and which meets the purpose of processing indicated in clause 3.2.5. of this Policy
Individuals, visitors to the LLC website on the information-telecommunication network "Internet"	Cookies; information collected through metric programs; other information that the subject fills in "feedback forms", meeting the purpose of processing indicated in clause 3.2.6. of this Policy
Individuals (representatives of clients and their employees), users of LLC services and resources located on the information-telecommunication network "Internet"	Surname, first name, patronymic (if any); email address; phone number; name of the organization, profession, position; country; cookies; information collected through metric programs; registration and authorization data (login, password), technical information about user devices, identifiers and other technical information;

Category of subjects	Composition of processed data
	other information that the subject wished to report about himself and which meets the purpose of processing indicated in clause 3.2.7. of this Policy
Individuals (applicants), candidates for filling vacant positions	Surname, first name, patronymic (if any); date of birth; marital status; email address, phone number; registration address and place of residence; identity document data; profession; position; information about labor activity (including length of service, data on current employment indicating the name and settlement account of the organization); attitude to military duty, military registration information; information collected through metric programs (when visiting the LLC website); information about education; details of the document on education (series, number, date of issue), received specialty; other information that the subject wished to report about himself and which meets the purpose of processing indicated in clause 3.2.8. of this Policy
Individuals (students of higher educational institutions) undergoing industrial practice at the LLC on the basis of agreements concluded between the LLC and higher educational institutions	Surname, first name, patronymic (if any); email address, phone number; identity document data; name of the educational institution, course, specialty (for students and pupils); other information that the subject wished to report about himself and which meets the purpose of processing indicated in clause 3.2.9 of this Policy
Individuals to whom one-time and temporary passes are issued when visiting the LLC	Surname, first name, patronymic (if any); identity document data; other information that the subject wished to report about himself and which meets the purpose of processing indicated in clause 3.2.10 of this Policy

Category of subjects	Composition of processed data
Individuals, representatives of state and supervisory bodies, in the event of their appeal with requests to the address of the LLC, as well as during the implementation of planned (unscheduled) inspections or conducting audits of the LLC's compliance with current legislation, regulatory documents of regulatory and supervisory bodies of the Russian Federation	Surname, first name, patronymic (if any); name of the state or supervisory body; subdivision; position, identity document data; other information that the subject wished to report about himself and which meets the purpose of processing indicated in clause 3.2.11 of this Policy
Individuals contacting the LLC with requests (applicants)	Surname, first name, patronymic (if any); identity document data; postal address; other information that the subject wished to report about himself and which meets the purpose of processing indicated in clause 3.2.12. of this Policy

5.2. Special categories of personal data of employees concerning health status or the presence (absence) of a criminal record are processed by the LLC in accordance with the norms of the current legislation of the Russian Federation.

5.3. The LLC does not process biometric personal data and special categories of personal data concerning racial and national origin, political views, religious and philosophical beliefs, and intimate life.

5.4. If necessary to process the above categories of personal data, their processing is possible only with the written consent of the personal data subject, except for cases provided for by the legislation of the Russian Federation.

5.5. Processing of personal data permitted by the personal data subject for distribution is carried out in the LLC on the basis of the consent of the personal data subject, in compliance with the prohibitions and conditions on the processing of personal data established by the personal data subject.

5.6. Processing of depersonalized personal data (cookies, information collected by metric programs) of visitors to websites and users of LLC services on the "Internet" network is processed by the LLC with the consent of website visitors and service users in order to improve the quality of customer service, usability of LLC websites and services on the "Internet" network, analysis of their attendance, and safe use.

5.7. The processing of depersonalized personal data is governed by the internal documents of the LLC posted on the website or service (rules, policies) and the rules of our partners providing these services.

6. Third parties to whom personal data may be transferred

6.1. In order to provide services and improve the quality of customer service, the LLC has the right to involve third parties and transfer personal data to them on the basis of an assignment for the purposes indicated above in this Policy.

6.2. Third parties processing personal data in accordance with clause 6.1. of this Policy:

Third parties, their location, link to Privacy Policy/website (if applicable)	Purpose of transfer	Address of the Third Party
LLC "Yandex" (Russia), Privacy Policy	Collection of web analytics in the interests of the LLC using the "Yandex. Metrika" service	Russian Federation, 119021, Moscow, Lev Tolstoy St., 16
LLC "UniSender Rus" (Russia), Privacy Policy	Implementation of advertising and marketing messages	Russian Federation, 127015, Moscow, Bolshaya Novodmitrovskaya St., 23, floor/premise 2/46
LLC "Calltouch Solutions" (Russia), User Agreement, Personal Data Processing Policy, Privacy Policy	Use of the "Callback" service (service widget on the company's website)	Russian Federation, 127018, Moscow, intracity municipal district Butyrsky, Skladochnaya St., 1 bldg. 9, premise 3/1
"Regional Network Information Center" (Russia), Policy regarding personal data processing and implementation of requirements for personal data protection	Provision of hosting services (storage of LLC sites on the hosting provider's platform)	Russian Federation, 123308, Moscow, 3rd Khoroshevskaya St., house 2, building 1
LLC "MVS Cloud Solutions" (Russia), Agreement on the provision of cloud services, User Agreement, Personal Data Processing Policy	Provision of cloud infrastructure certified under 152-FZ for hosting LLC services	Russian Federation, 199178, St. Petersburg, Maly Prospect V.O., 54, bldg. 4, litera V, premise 1-H, premise 72

Third parties, their location, link to Privacy Policy/website (if applicable)	Purpose of transfer	Address of the Third Party
Limited Liability Company "Yandex.Cloud" (Russia), Offer for the use of "Yandex.Cloud Platform" services, Special conditions for the use of "Yandex.Cloud Platform" services, User Agreement, Privacy Policy, Data Processing Agreement	Provision of cloud infrastructure certified under 152-FZ for hosting LLC services	Russian Federation, 119021, Moscow, Lev Tolstoy St., 16, room 528
LLC "1C-Online" (Russia), Policy regarding the processing and protection of personal data	Provision of access to ISPDn "1C:Cloud Platform" when using the HR EDM service	Russian Federation, 125130, Moscow, Klara Tsetkin St., 26A, bldg. 2, fl./room 1/8
LLC "VK" (Russia), Legal documents of LLC "VK", Privacy Policy of the "VK Cloud" platform	Provision of cloud infrastructure certified under 152-FZ when using the HR EDM service	Russian Federation, 125167, Moscow, Leningradsky Prospect, house No. 39, building 79
LLC "YANDEX 360 FOR BUSINESS" (Russia), User Agreement of Yandex services, Privacy Policy, License Agreement for the use of the "Yandex Telemost" application	Provision of video conferencing service	Russian Federation, 119021, Moscow, Timur Frunze St., 11 bldg. 44

7. Procedure and Conditions for Processing Personal Data

7.1. The processing of personal data is carried out by the LLC in a mixed way, both using automation tools and without using such.

7.2. Personal data is processed both on material (paper) carriers and in electronic form (in personal data information systems, on machine carriers) with transmission via the internal network and (or) using the information and telecommunication network "Internet".

7.3. When processing personal data without the use of automation tools, the LLC is guided by the rules established by the Decree of the Government of the Russian Federation of 15.09.2008

N 687 "On Approval of the Regulation on the Specifics of Processing Personal Data Carried Out Without the Use of Automation Tools".

7.4. When processing personal data, the following actions are performed: collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), blocking, deletion, destruction.

7.5. The processing of personal data is carried out on the conditions established by Article 6 of 152-FZ, complying with the requirements of personal data confidentiality established by Article 7 of 152-FZ, as well as taking measures aimed at ensuring the fulfillment of duties for the processing and protection of personal data.

7.6. Herewith:

- Processing of special categories of personal data, biometric personal data, and cross-border transfer of personal data may be carried out only with the consent in writing of the personal data subject, executed in accordance with paragraph 4 of Article 9 of 152-FZ or another legal basis;
- The personal data subject makes a decision on the provision of his personal data and gives consent to their processing freely, by his own will and in his own interest.
- Consent to the processing of personal data must be specific, subject-matter, informed, conscious, and unambiguous.
- Consent to the processing of personal data must be executed separately from other information and (or) documents that the personal data subject confirms and (or) signs.
- Consent to the processing of personal data may be given by the personal data subject or his legal representative in any form allowing to confirm the fact of its receipt, unless otherwise established by 152-FZ.
- In case of receiving consent to the processing of personal data from the legal representative of the personal data subject, the authority of this representative to give consent on behalf of the personal data subject is checked by the Operator.
- The obligation to provide proof of obtaining the consent of the personal data subject to the processing of his personal data or proof of the existence of grounds indicated in clauses 2 - 11 of Part 1 of Article 6, Part 2 of Article 10, and Part 2 of Article 11 of 152-FZ rests with the LLC, as the Operator.

7.7. Consent in writing of the personal data subject to the processing of his personal data must include, in particular: 1) surname, first name, patronymic, address of the personal data subject, number of the main document proving his identity, information on the date of issue of the specified document and the issuing authority; 2) surname, first name, patronymic, address of the representative of the personal data subject, number of the main document proving his identity, information on the date of issue of the specified document and the issuing authority, details of the power of attorney or other document confirming the authority of this representative (when receiving consent from the representative of the personal data subject); 3) name or surname, first name, patronymic, and address of the Operator receiving the consent of the personal data subject; 4) purpose of processing personal data; 5) list of personal data for the processing of

which the consent of the personal data subject is given; 6) name or surname, first name, patronymic, and address of the person processing personal data on behalf of the Operator, if the processing is entrusted to such a person; 7) list of actions with personal data for the performance of which consent is given, general description of the methods of processing personal data used by the Operator; 8) the period during which the consent of the personal data subject is valid, as well as the method of its revocation, unless otherwise established by federal law; 9) signature of the personal data subject.

7.8. Processing of personal data permitted by the personal data subject for distribution is carried out on the basis of consent, which is executed separately from other consents of the personal data subject in the form approved by the Order of the Federal Service for Supervision of Communications, Information Technology and Mass Media of 24.02.2021 N 18 "On approval of requirements for the content of consent to the processing of personal data permitted by the personal data subject for distribution".

7.9. In this consent, the subject has the right to determine the list of personal data for each category of personal data indicated in the consent to the processing of personal data permitted by the personal data subject for distribution, as well as to establish prohibitions on the transfer (except for granting access) of these personal data by the operator to an unlimited number of persons, as well as prohibitions on processing or conditions of processing (except for gaining access) of these personal data by an unlimited number of persons.

7.10. Consent to the processing of personal data permitted by the personal data subject for distribution may be provided to the Operator directly or using the information system of the authorized body for the protection of the rights of personal data subjects.

7.11. Silence or inaction of the personal data subject can under no circumstances be considered consent to the processing of personal data permitted by the personal data subject for distribution.

7.12. The Operator is obliged, within a period not exceeding three working days from the moment of receipt of the corresponding consent of the personal data subject, to publish information on the conditions of processing and on the existence of prohibitions and conditions on the processing by an unlimited number of persons of personal data permitted by the personal data subject for distribution.

7.13. Transfer (distribution, provision, access) of personal data permitted by the personal data subject for distribution must be terminated at any time at the request of the personal data subject.

7.14. The validity of the consent of the personal data subject to the processing of personal data permitted by the personal data subject for distribution terminates from the moment the Operator receives the request.

7.15. Cross-border transfer of personal data to the territories of foreign states may be carried out by the Operator subject to compliance with the conditions established by Article 12 of 152-FZ.

7.16. A condition for terminating the processing of personal data may be the achievement of the goals of processing personal data or the loss of the need to achieve the goals, the expiration of the consent of the personal data subject to the processing of his personal data or the revocation of the consent of the personal data subject to the processing of his personal data, as well as the detection of unlawful processing of personal data.

7.17. Upon achievement of the goals of processing personal data or in case of loss of the need to achieve the goals of processing, as well as in case of detection of the fact of unlawful processing of personal data or revocation by the personal data subject of consent to their processing of personal data, personal data are subject to destruction within the time limits established by the legislation of the Russian Federation, if:

- Otherwise is not provided by the agreement, to which the personal data subject is a party, beneficiary, or guarantor;
- The LLC is not entitled to carry out processing without the consent of the personal data subject on the grounds provided for by 152-FZ or other federal laws;
- Otherwise is not provided by another agreement between the LLC and the personal data subject.

7.18. Storage periods for personal data on paper carriers, upon achievement of the goals of their processing, are determined in accordance with the "List of typical managerial archival documents generated in the process of activities of state bodies, local self-government bodies and organizations, indicating their storage periods", approved by the order of the Federal Archival Agency dated December 20, 2019, No. 236.

7.19. Storage periods for personal data processed in personal data information systems correspond to the storage period for personal data on paper carriers.

8. Rights of the Personal Data Subject

8.1. The personal data subject has the right to receive information regarding the processing of his personal data, including containing:

- Confirmation of the fact of personal data processing by the LLC;
- Legal grounds and purposes of personal data processing;
- Purposes and methods of personal data processing used by the LLC;
- Name and location of the LLC, information about persons (excluding LLC employees) who have access to personal data or to whom personal data may be transferred or disclosed on the basis of an agreement with the LLC or on the basis of federal law;
- List and categories of processed personal data relating to the corresponding personal data subject, the source of their receipt, unless another procedure for submitting such data is provided by federal law;
- Terms of personal data processing, including their storage periods;
- Procedure for the exercise by the personal data subject of rights provided for by 152-FZ;
- Information on the carried out or intended cross-border transfer of personal data;
- Name or surname, first name, patronymic, and address of the person processing personal data on behalf of the LLC, if the processing is entrusted or will be entrusted to such a person;

- Information on purely automated decision-making by the LLC on the processing of personal data;
- Information on the ways the LLC fulfills the duties established by Article 18.1 of 152-FZ;
- Other information provided for by 152-FZ or other federal laws.

8.2. The right of the personal data subject to receive information regarding the processing of his personal data may be limited in cases established by Part 8 of Article 14 of 152-FZ.

8.3. Information indicated in clause 8.1 of this Policy is provided by the Operator to the personal data subject or his representative upon request or inquiry of the personal data subject.

8.4. The request sent to the Operator must contain the number of the main document proving the identity of the personal data subject or his representative, information on the date of issue of the specified document and the issuing authority, information confirming the participation of the personal data subject in relations with the Operator (contract number, date of conclusion of the contract, conventional verbal designation and (or) other information), or information otherwise confirming the fact of personal data processing by the Operator, signature of the personal data subject or his representative.

8.5. The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

8.6. The Operator provides information to the personal data subject or his representative in the form in which the corresponding appeal or request was sent, unless otherwise indicated in the appeal or request.

8.7. The personal data subject has the right to contact the Operator again or send him a repeated request in order to obtain the information indicated in clause 8.1 of this Policy not earlier than thirty days after the initial appeal or sending the initial request, unless a shorter period is established by federal law, a regulatory legal act adopted in accordance with it, or an agreement to which the personal data subject is a party or a beneficiary or guarantor.

8.8. The personal data subject has the right to demand correction of his personal data in case of detection of inaccuracies in the composition of personal data processed by the Operator or Processor on behalf of the Operator, as well as to make additions to personal data, including by providing an additional statement.

8.9. The personal data subject has the right to revoke his consent to the processing of personal data and demand the deletion of his personal data from the systems of the Operator or Processor if the personal data is no longer required for the purposes for which it was obtained, and the LLC or Processor lacks valid legal grounds for processing his data.

8.10. The personal data subject has the right to demand limitation of the processing of his personal data for the purposes of advertising offers of the LLC.

8.11. The personal data subject has the right to contact the Operator with a requirement to terminate the transfer (distribution, provision, access) of his personal data previously permitted by the personal data subject for distribution.

8.12. The personal data subject also has other rights established by the legislation of the Russian Federation.

8.13. An appeal of the personal data subject or his representative for the purpose of exercising his rights established by 152-FZ is carried out in writing with the presentation of a document proving the identity of the personal data subject (except when the appeal is carried out in the form of an electronic document signed with an electronic signature in accordance with the legislation of the Russian Federation), and in the case of an appeal by a representative – with the presentation of the representative's passport and a power of attorney or other document confirming the authority of the representative of the personal data subject.

8.14. The personal data subject or his representative has the right to contact the LLC with a claim regarding the processing of personal data using the details indicated in Section 13 of this Policy or posted on the official website of the LLC on the "Internet" network at the address <https://neurosoft.com/ru/contacts>.

9. Obligations of the LLC as Operator

9.1. In cases established by the legislation of the Russian Federation in the field of personal data, the LLC is obliged to provide gratuitously to the personal data subject or his legal representative (upon appeal) the information provided for by clause 8.1 of this Policy.

9.2. When collecting personal data, including through the information and telecommunication network "Internet", the LLC ensures the recording, systematization, accumulation, storage, clarification (updating, changing), extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation.

9.3. The LLC bears other obligations established by the legislation of the Russian Federation.

9.4. The LLC independently determines the composition and list of measures necessary and sufficient to ensure the fulfillment of duties provided for by 152-FZ and regulatory legal acts adopted in accordance with it, unless otherwise provided by 152-FZ or other federal laws.

9.5. The LLC provides access to this Policy to an indefinite circle of persons, including using the official resources of the LLC on the "Internet" network.

9.6. The following measures are taken in the LLC to ensure the fulfillment of duties provided for by 152-FZ in the field of personal data processing:

- A person responsible for organizing the processing of personal data has been appointed;
- Local acts on personal data processing issues are issued, defining for each purpose of personal data processing the categories and list of processed personal data, terms of their processing and storage, the procedure for destruction upon achievement of processing goals or upon the occurrence of other legal grounds, as well as local acts aimed at preventing and detecting violations of the legislation of the Russian Federation, eliminating the consequences of such violations;
- A set of legal, organizational, and technical measures is applied to ensure the security of personal data in accordance with Article 19 of the Federal Law, aimed at neutralizing

actual threats to the security of personal data during their processing in the information systems and services of the LLC;

- An assessment is made of the harm that may be caused to personal data subjects in case of violation of 152-FZ, the ratio of the specified harm and the measures taken by the LLC aimed at ensuring the fulfillment of duties provided for by 152-FZ;
- Internal control and (or) audit of compliance of personal data processing with 152-FZ and regulatory legal acts adopted in accordance with it, requirements for personal data protection, the LLC policy regarding personal data processing, local acts in the field of processing and ensuring the security of personal data is carried out;
- An analysis of products (items) and processes created in the LLC is conducted for proper processing of personal data;
- Familiarization of employees directly carrying out personal data processing with the provisions of the legislation of the Russian Federation on personal data, including requirements for personal data protection, documents defining the LLC Policy regarding personal data processing, local acts of the LLC on personal data processing issues, and (or) training of said employees is carried out.

9.7. Upon the appeal of the personal data subject, the LLC provides the personal data subject or his legal representative with information regarding the processing of his personal data (upon appropriate appeal or request) in an accessible form and not containing personal data of other persons.

9.8. The LLC considers the appeal of the personal data subject and provides the personal data subject or his representative with the information indicated in clause 8.1 of this Policy within ten working days from the moment of the appeal or receipt of the request of the personal data subject or his representative.

9.9. The specified period may be extended, but not more than by five working days in case the LLC sends a motivated notification to the address of the personal data subject indicating the reasons for extending the period for providing the requested information.

9.10. At the same time, the LLC provides the personal data subject or his representative with information in the form in which the corresponding appeal or request was sent, unless otherwise indicated in the appeal or request.

9.11. In case of refusal to provide information on the existence of personal data about the corresponding personal data subject or personal data to the personal data subject or his representative upon their appeal or upon receipt of a request from the personal data subject or his representative, the LLC is obliged to give a motivated answer in writing containing a reference to the provision of Part 8 of Article 14 of 152-FZ or another federal law, which is the basis for such refusal, within a period not exceeding ten working days from the date of the appeal of the personal data subject or his representative or from the date of receipt of the request of the personal data subject or his representative.

9.12. The specified period may be extended, but not more than by five working days in case the operator sends a motivated notification to the address of the personal data subject indicating the reasons for extending the period for providing the requested information.

9.13. The LLC is obliged to report to the authorized body for the protection of the rights of personal data subjects at the request of this body the necessary information within ten working days from the date of receipt of such request.

9.14. The specified period may be extended, but not more than by five working days in case the operator sends a motivated notification to the address of the authorized body for the protection of the rights of personal data subjects indicating the reasons for extending the period for providing the requested information.

9.15. In case of detection of unlawful processing of personal data upon appeal of the personal data subject or his representative or upon request of the personal data subject or his representative or the authorized body for the protection of the rights of personal data subjects, the Operator is obliged to block the unlawfully processed personal data relating to this personal data subject, or ensure their blocking (if the processing of personal data is carried out by a Processor acting on behalf of the Operator) from the moment of such appeal or receipt of the specified request for the verification period.

9.16. In case of detection of inaccurate personal data upon appeal of the personal data subject or his representative or upon their request or upon request of the authorized body for the protection of the rights of personal data subjects, the Operator is obliged to block personal data relating to this personal data subject, or ensure their blocking (if the processing of personal data is carried out by a Processor acting on behalf of the Operator) from the moment of such appeal or receipt of the specified request for the verification period, if blocking personal data does not violate the rights and legitimate interests of the personal data subject or third parties.

9.17. In case of confirmation of the fact of inaccuracy of personal data, the Operator, on the basis of information provided by the personal data subject or his representative or the authorized body for the protection of the rights of personal data subjects, or other necessary documents, is obliged to clarify personal data or ensure their clarification (if the processing of personal data is carried out by a Processor acting on behalf of the Operator) within seven working days from the day of submission of such information and remove the blocking of personal data.

9.18. In case of establishing the fact of unlawful or accidental transfer (provision, distribution, access) of personal data, entailing a violation of the rights of personal data subjects, the Operator is obliged from the moment of detection of such an incident by the Operator, the authorized body for the protection of the rights of personal data subjects, or another interested person, to notify the authorized body of the Russian Federation for the protection of the rights of personal data subjects (Roskomnadzor):

- Within twenty-four hours about the occurred incident, about the alleged reasons entailing the violation of the rights of personal data subjects, and the alleged harm caused to the rights of personal data subjects, about the measures taken to eliminate the consequences of the corresponding incident, as well as provide information about the person authorized by the operator to interact with the authorized body for the protection of the rights of personal data subjects on issues related to the detected incident.

- Within seventy-two hours about the results of the internal investigation of the detected incident, as well as provide information about persons whose actions became the cause of the detected incident (if any).

9.19. In case of achieving the goal of processing personal data, the Operator is obliged to terminate the processing of personal data or ensure its termination (if the processing of personal data is carried out by a Processor acting on behalf of the Operator) and destroy personal data or ensure their destruction (if the processing of personal data is carried out by a Processor acting on behalf of the Operator) within a period not exceeding thirty days from the date of achieving the goal of processing personal data, unless otherwise provided by the agreement, to which the personal data subject is a party, beneficiary, or guarantor, another agreement between the Operator and the personal data subject, or if the Operator is not entitled to carry out the processing of personal data without the consent of the personal data subject on the grounds provided for by 152-FZ or other federal laws.

9.20. In case of revocation by the personal data subject of consent to the processing of his personal data, the Operator is obliged to terminate their processing or ensure the termination of such processing (if the processing of personal data is carried out by a Processor acting on behalf of the Operator) and, in case the preservation of personal data is no longer required for the purposes of processing personal data, destroy personal data or ensure their destruction (if the processing of personal data is carried out by a Processor acting on behalf of the Operator) within a period not exceeding thirty days from the date of receipt of the specified revocation, unless otherwise provided by the agreement, to which the personal data subject is a party, beneficiary, or guarantor, another agreement between the Operator and the personal data subject, or if the Operator is not entitled to carry out the processing of personal data without the consent of the personal data subject on the grounds provided for by 152-FZ or other federal laws.

9.21. In case of appeal of the personal data subject to the Operator with a demand to terminate the processing of personal data, the operator is obliged, within a period not exceeding ten working days from the date of receipt by the operator of the corresponding demand, to terminate their processing or ensure the termination of such processing (if such processing is carried out by a person carrying out the processing of personal data), except for cases provided for by clauses 2 - 11 of Part 1 of Article 6, Part 2 of Article 10, and Part 2 of Article 11 of this Federal Law.

9.22. The specified period may be extended, but not more than by five working days in case the operator sends a motivated notification to the address of the personal data subject indicating the reasons for extending the period for providing the requested information.

9.23. In case of absence of the possibility of destroying personal data within the periods indicated in clauses 9.19-9.20 of this Policy, the LLC carries out blocking of such personal data or ensures their blocking (if the processing of personal data is carried out by another person acting on behalf of the Operator) and ensures the destruction of personal data within a period of no more than six months, unless another period is established by federal laws.

9.24. Destruction of personal data recorded on paper carriers may be carried out by the Operator in any available way (blacking out, burning, using paper-cutting technical means (shredders)); destruction of personal data recorded in electronic form on any material carriers and (or) in personal data information systems may be carried out using physical impact on material carriers

(smashing, shredding, etc.), using information protection means that have passed the conformity assessment procedure in the established order, which include the function of destroying information, or using the built-in functionality of the information systems themselves.

9.25. If, in accordance with federal law, the provision of personal data and (or) obtaining by the Operator of consent to the processing of personal data are mandatory, the Operator is obliged to explain to the personal data subject the legal consequences of refusal to provide his personal data and (or) give consent to their processing.

10. Measures Aimed at Protecting Personal Data

10.1. The personal data protection system in the LLC includes a set of legal, organizational, and technical measures aimed at neutralizing actual threats to the security of personal data during their processing in personal data information systems, taking into account the specifics of the information infrastructure, the architecture of personal data information systems, and the used information technologies, in accordance with the requirements for personal data protection for each of the levels of protection established by the federal executive body authorized in the field of security (FSB of Russia), and the federal executive body authorized in the field of countering technical intelligence and technical protection of information (FSTEC of Russia), within their powers.

10.2. Selection and implementation of means and systems for protecting personal data during their processing in personal data information systems can be carried out by the LLC's own forces or with the involvement of third-party organizations having a license for technical protection of confidential information not containing information constituting a state secret.

10.3. Protection of personal data during their processing in personal data information systems from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, and distribution, as well as from other unlawful actions regarding personal data, is ensured by the application of an interconnected set of measures and means of protection, in particular:

- Threats to the security of personal data during their processing in personal data information systems are determined and updated;
- Organizational and technical measures are applied to ensure the security of personal data during their processing in personal data information systems, aimed at neutralizing actual threats to the security of personal data in accordance with the legislation of the Russian Federation;
- Information protection means that have passed the conformity assessment procedure in the established order, intended for neutralizing actual security threats, are applied;
- An assessment of the effectiveness of the measures taken to ensure the security of personal data is carried out before the commissioning of the personal data information system;
- Accounting of machine carriers of personal data is carried out;
- Measures are taken to detect facts of unauthorized access to personal data and to take appropriate measures, including measures to detect, prevent, and eliminate the

consequences of computer attacks on personal data information systems and to respond to computer incidents in them;

- The possibility of restoring personal data modified or destroyed due to unauthorized access to them is ensured;
- Rules for access to personal data processed in the personal data information system are established, and registration and accounting of actions performed with personal data in the personal data information system are ensured;
- Control over the measures taken to ensure the security of personal data is carried out.

10.4. In the event of information security incidents related to the processing of personal data and entailing unlawful transfer (provision, distribution, access) of personal data, the LLC, in the manner determined by the FSB of Russia, must ensure interaction with the state system for detection, prevention, and elimination of the consequences of computer attacks on information resources of the Russian Federation, including informing it about computer incidents in order to minimize the consequences of incidents for personal data subjects and prevent them in the future.

11. Responsibility

11.1. Persons guilty of violating the norms and rules regulating the processing of personal data, their protection, and ensuring confidentiality, bear full responsibility provided for by the current legislation of the Russian Federation.

12. Final Provisions

12.1. Unlimited access of all interested parties, including personal data subjects and authorities exercising control and supervisory functions in the field of personal data, is provided to this Policy.

12.2. This Policy comes into force from the moment of its approval and is valid indefinitely.

12.3. If it is necessary to make changes to the current Policy, the Policy is approved in a new edition.

13. Requisites and Contact Information

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