

POLICY ON THE PROCESSING AND PROTECTION OF PERSONAL DATA IN NEUROSOFT LLC

1. GENERAL PROVISIONS

1.1. This policy (hereinafter - the Policy) on the processing and protection of personal data in Neurosoft Limited Liability Company (hereinafter - the Company, the Operator) has been developed in accordance with the requirements of Part 2 of Article 18.1 of the Federal Law dated 27 July 2006 No. 152-FZ "On Personal Data" (hereinafter - 152-FZ), other subordinate regulations and regulatory documents of the regulating and supervisory authorities of the Russian Federation.

1.2. This Policy defines the purposes, content, procedure for processing, and measures aimed at the protection of personal data of individuals or their legal representatives (personal data subjects) in connection with the implementation of employment relations, the conclusion of agreements and performance of contractual obligations, and in the course of the Company's charter and business activities.

1.3. Personal data constitute confidential information and must be protected against unauthorized, including accidental, access thereto. The Company and other persons who have obtained access to personal data shall be 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 applicable legislation of the Russian Federation.

1.4. Processing of personal data in the Company is carried out in compliance with the principles and conditions stipulated by this Policy and the legislation of the Russian Federation in the field of personal data.

1.5. This Policy applies to all processes related to the processing of personal data.

1.6. This Policy shall be mandatory for review and compliance by all persons admitted to the processing of personal data.

1.7. Pursuant to an order of the Federal Service for Supervision of Communications, Information Technology and Mass Media, the Company is included in the register of operators processing personal data (hereinafter - the Operator).

1.8. This Policy is reviewed and updated in connection with changes in the legislation of the Russian Federation in the field of personal data, and based on the results of analysis of the relevance, sufficiency and effectiveness of the applied measures to ensure the security of personal data when processed in personal data information systems.

1.9. The current version of the Policy is published on the official website of the Company on the Internet at: <https://neurosoft.com/en> (and other information resources and services of the Company on the Internet) and enters into force from the moment of its publication, unless a different effective date of amendments is additionally determined.

1.10. In all other matters not provided for by this Policy, the Company shall be guided by the provisions of the applicable legislation of the Russian Federation.

2. TERMS AND DEFINITIONS

Personal data - any information relating to a directly or indirectly identified or identifiable individual (personal data subject).

Personal data permitted by the personal data subject for dissemination - personal data to which an unlimited number of persons are granted access by the personal data subject by giving consent to the processing of personal data permitted by the personal data subject for dissemination in the manner provided for by this Federal Law.

Operator - a state authority, municipal authority, legal entity or individual that independently or jointly with other persons organizes and/or carries out the processing of personal data, as well as determines the purposes of processing personal data, the composition of personal data to be processed, and actions (operations) performed with personal data.

Processing of personal data - any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, updating, modification, extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Processor - a state authority, municipal authority, legal entity or individual that processes personal data on behalf of the Operator on the basis of a concluded agreement, including a state or municipal contract, or an instruction of the Operator.

Automated processing of personal data - processing of personal data using computer equipment.

Dissemination of personal data - actions aimed at disclosure of personal data to an indefinite number of persons.

Provision of personal data - actions aimed at disclosure of personal data to a specific person or a specific group of persons.

Blocking of personal data - temporary cessation of processing of personal data (except where processing is necessary to update or modify personal data).

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 tangible media containing personal data are destroyed.

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

Level of protection of personal data - a comprehensive indicator characterizing requirements, the fulfillment of which ensures neutralization of certain threats to the security of personal data when processed in personal data information systems.

Depersonalization of personal data - actions as a result of which it becomes impossible, without using additional information, to determine the belonging of personal data to a specific personal data subject.

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

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.

Person responsible for organizing the processing of personal data - an official appointed by order of the President of the Company who organizes the adoption of legal, organizational and technical measures to ensure 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.

Confidentiality of personal data - a requirement mandatory for the Company or another person who has obtained access to personal data not to disclose to third parties and not to disseminate personal data without the consent of the personal data subject or other legal basis provided by federal law.

3. PURPOSES AND LEGAL GROUNDS FOR THE PROCESSING OF PERSONAL DATA

3.1. Processing of personal data is carried out by the Company in execution of functions, powers and duties imposed by the legislation of the Russian Federation on the Company, including for providing personal data to state authorities, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Mandatory Medical Insurance Fund, the Federal Tax Service of the Russian Federation, as well as other state authorities.

3.2. Personal data are processed in the Company for the following purposes:

3.2.1. Implementation of functions, powers and duties imposed by legislation on the Company as the Operator when regulating relations with employees (assistance in employment, training and promotion, ensuring personal safety, control of the

quantity and quality of work performed, ensuring the safety of property, payment of wages and other payments due to the employee, secondment of employees, participation in exhibitions, seminars, conferences, holding corporate events, creation of reference materials, publication of information on the Operator's information resources and printed publication, issuance of an electronic signature, granting access to resources and services);

3.2.2. Carrying out activities related to relations with clients when concluding and performing agreements, processing orders, payment and release of finished products, purchase of components, after-sales service, provision of technical support, obtaining feedback to improve the quality of manufactured products, conducting marketing research, and interaction in promoting goods, works and services on the market;

3.2.3. Holding conferences, seminars, webinars and training courses for clients (clients' representatives) on working with manufactured products (including using the Operator's resources (websites) in the Internet information and telecommunications network, including registration, authorization and use of personal accounts);

3.2.4. Regulation of activities under civil law contracts;

3.2.5. Regulation of activities related to recruitment for vacant positions, performance of contractual obligations providing for industrial practice of individuals (students) studying at educational institutions at the Company's production facilities;

3.2.6. Ensuring access control on the Company's premises;

3.2.7. Provision of electronic services to clients (clients' representatives) (granting non-exclusive rights to use computer programs and databases via the Internet information and communications network, including by providing remote access to them);

3.2.8. Interaction with state organizations and supervisory authorities, with personal data subjects in case of their requests, including for sending notifications and information when promoting goods (works, services), processing requests, applications, claims and other messages of personal data subjects.

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

3.3.1. The Constitution of the Russian Federation.

3.3.2. The Civil Code of the Russian Federation.

3.3.3. The Tax Code of the Russian Federation.

3.3.4. The Labor Code of the Russian Federation.

3.3.5. Federal Law dated 27.07.2006 No. 152 "On Personal Data".

3.3.6. Federal Law dated 27.07.2006 No. 149 "On Information, Information Technologies and Information Protection".

3.3.7. Federal Law dated 01.04.1996 No. 27-FZ "On Individual (Personalized) Registration in the

Mandatory Pension Insurance System".

3.3.8. Federal Law dated 06.12.2011 No. 402-FZ "On Accounting".

3.3.9. Federal Law dated 28.03.1998 No. 53-FZ "On Military Duty and Military Service".

3.3.10. Decree of the Government of the Russian Federation dated 15.09.2008 No. 687 "On Approval

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

3.3.11. The Charter of the Company.

3.3.12. Other subordinate regulations and normative legal documents of the regulating and supervisory authorities of the Russian Federation.

4. PRINCIPLES AND CONDITIONS FOR THE PROCESSING OF PERSONAL DATA

4.1. Processing of personal data in the Company is carried out on the basis of the following principles:

4.1.1. Existence of lawful grounds for processing personal data.

4.1.2. Limitation of processing of personal data to achieving specific, pre-determined and lawful purposes.

4.1.3. Prohibition on combining databases containing personal data processed for purposes incompatible with each other.

4.1.4. Processing only those personal data that correspond to the purposes of processing.

4.1.5. Compliance of the content and volume (non-excessiveness) of processed personal data with the stated purposes of processing.

4.1.6. Ensuring accuracy of personal data, their sufficiency and, where necessary, relevance in relation to the purposes of processing personal data.

4.1.7. Storage of personal data in a form enabling identification of the personal data subject, for no longer than required by the purposes of processing personal data, unless the retention period is established by the legislation of the Russian Federation, an agreement to which the personal data subject is a party, beneficiary or guarantor, or another agreement.

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

4.2.1. The consent of the personal data subject to processing of his/her personal data has been

obtained;

4.2.2. Processing of personal data is necessary for exercising and fulfilling functions, powers and

duties imposed by the legislation of the Russian Federation on the Company as the Operator;

4.2.3. Processing of personal data is carried out in connection with participation of the personal data subject as a person in constitutional, civil, administrative, criminal proceedings, or proceedings in arbitration courts (for enforcement of a judicial act in accordance with the legislation of the Russian Federation on enforcement proceedings);

4.2.4. Processing of personal data is necessary for performance of an agreement to which the personal data subject is a party or a beneficiary or guarantor, as well as for concluding an agreement at the initiative of the personal data subject or an agreement under which the personal data subject will be a beneficiary or guarantor. An agreement concluded with a personal data subject may not contain provisions restricting 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, as a condition for concluding an agreement, the inaction of the personal data subject;

4.2.5. Processing of personal data is necessary to protect the life, health or other vital interests of the personal data subject, if obtaining consent is impossible;

4.2.6. Processing of personal data is necessary for exercising the rights and legitimate interests of the Operator or third parties or for achieving socially significant goals, provided that the rights and freedoms of the subject are not violated;

4.2.7. Processing of personal data is carried out for statistical or other research purposes, subject to mandatory depersonalization of personal data;

4.2.8. Processing of personal data subject to publication or mandatory disclosure in accordance with the legislation of the Russian Federation is carried out.

4.3. 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 such party and an instruction of the Operator. In this case, the Processor shall comply with the principles and rules of processing personal data stipulated by 152-FZ, maintain confidentiality of personal data, and take necessary measures aimed at ensuring their security. The Operator's instruction shall specify:

4.3.1. The list of personal data;

4.3.2. The list of actions (operations) with personal data to be performed by the Processor;

4.3.3. The purposes of processing;

4.3.4. The Processor's obligation to maintain confidentiality of personal data, to comply with the requirements of Part 5 of Article 18, Article 18.1, Article 19 and Part 3 of Article 21 of 152-FZ, as well as the Operator's right to request and receive from the Processor documents and other information confirming the Processor's fulfillment of the established measures and requirements.

4.4. A Processor processing personal data on behalf of the Operator is not obliged to obtain the subject's consent for processing of his/her personal data.

4.5. If the Operator entrusts processing of personal data to the Processor, the Operator shall be liable to the personal data subject for the Processor's actions, while the Processor processing personal data on behalf of the Operator shall be liable to the Operator.

4.6. If the Operator entrusts processing of personal data to a Processor that is a foreign individual or a foreign legal entity, both the Operator and the Processor shall be liable to the personal data subject for the actions of such Processor(s).

4.7. For information support purposes, the Company may create publicly available sources of personal data (including directories, address books). With the written consent of the personal data subject, such sources may include his/her surname, name, patronymic (if any), year and place of birth, address, subscriber number, information on profession and other personal data reported by the personal data subject.

4.8. Employees of the Company admitted to processing of personal data shall be obliged to:

4.8.1. Know and strictly comply with the provisions of the legislation of the Russian Federation in the

field of personal data, this Policy, and the Company's local acts on processing and ensuring the security of personal data;

4.8.2. Process personal data only within the scope of their job duties;

4.8.3. Ensure confidentiality and security of the processed personal data;

4.8.4. Not disclose to third parties and not disseminate personal data without the subject's consent, unless otherwise provided by federal law;

4.8.5. Report actions of other persons that may lead to violation of this Policy, or known facts of violation 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 Company processes personal data of the following categories of personal data subjects:

5.1.1. Individuals who are or were previously in employment and other civil-law relations with the Company and/or their legal representatives, in particular employees, former employees, close relatives of employees and/or former employees.

5.1.2. Individuals who are employees of clients and counterparties and/or their legal representatives.

5.1.3. Individuals who are candidates (applicants) for vacant positions, students of educational institutions undergoing practical training at the Company's facilities, on the basis of agreements concluded between the Company and educational institutions.

5.1.4. Individuals who are representatives of legal entities and individual entrepreneurs acting as representatives of the Company under concluded agreements (agents, dealers).

5.1.5. Individuals to whom one-time and temporary passes are issued when visiting the Company.

5.1.6. Individuals (clients' representatives and their employees) who are granted the right of access to and use of the Company's services and resources posted on the Internet information and telecommunications network, including a non-exclusive right to use computer programs and databases.

5.1.7. Individuals who are representatives of state and supervisory authorities, in the event of their requests to the Company, as well as during scheduled (unscheduled) inspections or audits of the Company's compliance with applicable legislation and regulatory documents of the regulating and supervisory authorities of the Russian Federation.

5.1.8. Other subjects (individuals) contacting the Company with requests (applicants).

5.2. The composition of processed personal data specified in clause 5.1.1 of this Policy includes the following categories of personal data:

- 1) Surname, name, patronymic (if any);
- 2) Date of birth;
- 3) Gender;
- 4) Citizenship;
- 5) Place of birth;
- 6) Marital status;
- 7) Social status;
- 8) Property status, income;
- 9) Registration address and residence address;
- 10) Telephone numbers, email addresses, identifiers in social networks and messengers;
- 11) SNILS;
- 12) INN;
- 13) Identity document data;
- 14) Identity document data for use outside the Russian Federation;
- 15) Driver's license data;
- 16) Military duty status, military registration information;
- 17) Marriage certificate;
- 18) Information on change of full name;
- 19) Information on children, including child's birth certificate;
- 20) Information on relatives who are dependents;
- 21) Pension and medical insurance data;
- 22) Information on social and other benefits;

- 23) Information on awards and incentives, honorary titles, state and departmental awards;
- 24) Information on disability;
- 25) Information on tax benefits;
- 26) Information on writs of execution and payment of alimony;
- 27) Information on wages and other income received in the course of performing employment duties;
- 28) Details for transfer of funds (bank card number, bank account number, personal account number);
- 29) Education information, name of educational institution;
- 30) Profession, position, department;
- 31) Information on employment activity (including length of service, data on current employment indicating the name and settlement account of the organization);
- 32) Information on hiring, transfer, dismissal;
- 33) Photo and video image;
- 34) Results of training, testing;
- 35) Results of special assessment of working conditions (SAWC);
- 36) Information on advanced training, completed trainings, confirming certificates;
- 37) Information on leaves;
- 38) Information on bonus categories, coefficients and bonus amounts;
- 39) Personnel number;
- 40) Date of assuming office;
- 41) Results of assessment activities conducted;
- 42) Information on presence/absence of a criminal record;
- 43) Information on previous places of work and work experience;
- 44) Other information that the subject wished to provide about himself/herself and that corresponds to the processing purposes specified in Section 3 of this Policy.

5.3. The composition of processed personal data specified in clause 5.1.2 of this Policy includes the following categories of personal data:

- 1) Surname, name, patronymic (if any);
- 2) Email address;
- 3) Telephone number;
- 4) INN;
- 5) Identity document data;
- 6) Personal account number;
- 7) Name of organization, profession, position;
- 8) Country, location address, postal address, details of the organization;
- 9) Other information about potential clients and counterparties obtained from open sources;
- 10) Other information that the subject wished to provide about

himself/herself and that corresponds to the processing purposes specified in Section 3 of this Policy.

5.4. The composition of processed personal data specified in clause 5.1.3 of this Policy includes the following categories of personal data:

- 1) Surname, name, patronymic (if any);
- 2) Date of birth;
- 3) Marital status;
- 4) Email address, telephone number;
- 5) Registration address and residence address;
- 6) Identity document data;
- 7) Driver's license data;
- 8) Profession; position;
- 9) Information on employment activity (including length of service, data on current employment indicating the name and settlement account of the organization);
- 10) Military duty status, military registration information;
- 11) Information collected via metrics programs (when visiting the Company's website);
- 12) Education information;
- 13) Name of educational institution, year/course, specialty (for students and pupils);
- 14) Details of the education document (series, number, date of issuance), specialty obtained;
- 15) Other information that the subject wished to provide about himself/herself and that corresponds to the processing purposes specified in Section 3 of this Policy.

5.5. The composition of processed personal data specified in clause 5.1.4 of this Policy includes the following categories of personal data:

- 1) Surname, name, patronymic (if any);
- 3) Identity document data;
- 4) Contact telephone numbers;
- 5) Email address;
- 6) Residence address, registration address;
- 7) SNILS; 8) INN;
- 9) Details for transfer of funds (settlement account number; personal account number);
- 10) Country, location address, postal address, details of the organization;
- 11) Other information obtained from open sources;
- 12) Other information that the subject wished to provide about himself/herself and that corresponds to the processing purposes specified in Section 3 of this Policy.

5.6. The composition of processed personal data specified in clause 5.1.5 of this Policy includes the following categories of personal data:

- 1) Surname, name, patronymic (if any);

2) Identity document data;
3) Driver's license data (if access by vehicle to the Company's premises is required);

4) Photo on the pass (for the Company's employees), name of educational institution (for pupils and students).

5) Other information that the subject wished to provide about himself/herself and that corresponds to the processing purposes specified in Section 3 of this Policy.

5.7. The composition of processed personal data specified in clause 5.1.6 of this Policy includes the following categories of personal data:

1) Surname, name, patronymic (if any);

2) Email address;

3) Telephone number;

4) Profession, position;

5) Region;

6) Name of organization, INN, KPP;

7) Information collected via metrics programs;

8) Other information that the subject wished to provide about himself/herself and that corresponds to the processing purposes specified in Section 3 of this Policy.

5.8. The composition of processed personal data specified in clause 5.1.7 of this Policy includes the following categories of personal data:

1) Surname, name, patronymic (if any);

2) Email address;

3) Telephone number;

4) Identity document data;

5) Name of state organization, supervisory authority;

6) Department, position;

7) Postal address (for applicants);

8) Other information that the subject wished to provide about himself/herself and that corresponds to the processing purposes specified in Section 3 of this Policy.

5.9. The composition of processed personal data specified in clause 5.1.8 of this Policy includes the following categories of personal data:

1) Surname, name, patronymic (if any);

2) Email address;

3) Telephone number;

4) Identity document data;

5) Postal address;

6) Other information that the subject wished to provide about himself/herself and that corresponds to the processing purposes specified in Section 3 of this Policy.

5.10. Special categories of employees' personal data concerning health status or presence (absence) of a criminal record are processed by the Company in accordance with the standards of the applicable legislation of the Russian Federation.

5.11. The Company 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. If processing of the above categories of personal data is necessary, such processing is possible only with the written consent of the personal data subject, except for cases provided by the legislation of the Russian Federation.

5.12. Processing of personal data permitted by the personal data subject for dissemination is carried out in the Company on the basis of the consent of the personal data subject, with observance of prohibitions and conditions for processing personal data established by the personal data subject.

5.13. In order to improve the quality of customer service, usability of the Company's website on the Internet and analysis of website traffic, in addition to personal data provided by subjects (users) when completing forms posted on the website, the Company (using metrics programs or scripts of partners "Yandex.Metrica", Calltouch) collects other personal data about user actions, namely: IP address; country of registration; the domain name from which the transition to the website was made; information about transitions of the user from one page of the website to another; information provided by the browser used by the user ("cookie" files - small data files that the user's browser saves at the request of the website, allowing the website to "remember" actions or preferences for a long time). In particular, the Company's website(s) use(s) the following cookies: 1) Session cookies (stored during the website visit session and deleted by the browser when it is closed); 2) Persistent cookies (not deleted when the browser is closed and stored for the specified period); 3) Third-party cookies (provided by third-party partner services, e.g., analytics services such as "Yandex.Metrica" or video playback services such as "YouTube"). The user may prohibit the sending of cookies independently by disabling them in the settings of the browser used (for more information about cookies and settings of different browsers, the user may refer to the websites of the browser developer).

6. THIRD PARTIES TO WHOM PERSONAL DATA MAY BE TRANSFERRED

6.1. For the purposes of providing services and improving the quality of customer service, the

Company has the right to engage third parties and transfer to them personal data on the basis of an instruction for the purposes specified in this Policy.

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

Processing purpose	Third party / location / privacy	Transfer purpose	Third party address policy link (if
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			applicable)
Collection of web analytics	Yandex LLC (Russia)	Web analytics services provider (Yandex.Metrica)	16 Leo Tolstoy St., Moscow, 119021
Sending advertising and Performing mailings	UniSender Rus LLC (Russia)	Marketing messages	Novodmitrovskaya St., bldg. 23, floor/room 2/46, Moscow, 127015
Provision of hosting	"Regional Network Information Storage of the Company's 2, bldg. 1, 3rd services Center" (Russia)	Storage of the Company's websites on the hosting	2, bldg. 1, 3rd Khoroshevskaya St., Moscow, 123308
Providing access to the Public Joint Stock Company Use of virtual infrastructure	the Public Joint Stock Company Use of virtual infrastructure 4, bldg. 1, Marksistskaya cloud service "Virtual "Mobile TeleSystems" (Russia)	Use of virtual infrastructure for hosting and providing access to the Company's cloud services	4, bldg. 1, Marksistskaya St., Moscow, 109147

7. PROCEDURE AND CONDITIONS FOR THE PROCESSING OF PERSONAL DATA

7.1. Processing of personal data is carried out by the Company using a mixed method, both with and without the use of automation tools. Personal data are processed both on tangible (paper) media and electronically (in personal data information systems, on machine media) with transfer via the internal network and/or using the Internet information and telecommunications network. When processing personal data without using automation tools, the Company is guided by the rules established by Decree of the Government of the Russian Federation dated 15.09.2008 No. 687 "On Approval of the Regulation on the Specifics of Processing Personal Data Carried Out Without the Use of Automation Tools".

7.2. When processing personal data, the following actions are performed: collection, recording, systematization, accumulation, storage, updating (modification),

extraction, use, transfer (distribution, provision, access), blocking, deletion, destruction.

7.3. Processing of personal data is carried out with the consent of the personal data subject, except for cases established by the legislation of the Russian Federation, with observance of the requirements of confidentiality of personal data established by Article 7 of 152-FZ, as well as by taking measures aimed at ensuring fulfillment of duties for processing and protection of personal data established by the legislation of the Russian Federation. In doing so:

7.3.1. Processing of special categories of personal data, biometric personal data and cross-border transfer of personal data may be carried out only with the written consent of the Personal Data Subject executed in accordance with clause 4 of Article 9 of 152-FZ, or on another lawful basis;

7.3.2. The personal data subject decides to provide his/her personal data and gives consent to their processing freely, by his/her own will and in his/her own interest. Consent to processing of personal data must be specific, purpose-bound, informed, conscious and unambiguous. Consent to processing of personal data may be given by the personal data subject or his/her legal representative in any form that allows confirming the fact of its receipt, unless otherwise established by 152-FZ. If consent is received from the legal representative of the personal data subject, the Operator verifies the authority of such representative to give consent on behalf of the personal data subject.

7.3.3. The obligation to provide evidence of obtaining the consent of the personal data subject for processing of his/her personal data or evidence of the existence of the grounds specified in items 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 Operator.

7.4. The written consent of the personal data subject to processing of his/her personal data must include, in particular: 1) surname, name, patronymic, address of the personal data subject, number of the main identity document, information on the date of issuance of such document and the issuing authority; 2) surname, name, patronymic, address of the representative of the personal data subject, number of the main identity document, information on the date of issuance of such document and the issuing authority, details of the power of attorney or other document confirming the authority of such representative (when obtaining consent from the representative of the personal data subject); 3) name or surname, name, patronymic and address of the Operator receiving the consent; 4) purpose of processing personal data; 5) list of personal data for processing of which consent is given; 6) name or surname, name, patronymic and address of the person processing personal data on behalf of the Operator, if processing will be entrusted to such person; 7) list of actions with personal data for which consent is given, a general description of the methods of processing personal data used by the Operator; 8) period for which the consent is

valid, as well as the method of its withdrawal, unless otherwise established by federal law; 9) signature of the personal data subject.

7.5. Consent to processing of personal data permitted by the personal data subject for dissemination is executed separately from other consents of the personal data subject, in the form approved by Order of the Federal Service for Supervision of Communications, Information Technology and Mass Media dated 24.02.2021 No. 18 "On Approval of Requirements for the Content of Consent to Processing of Personal Data Permitted by the Personal Data Subject for Dissemination". In such consent, the subject has the right to determine the list of personal data for each category of personal data specified in the consent, as well as to establish prohibitions on transfer (except for granting access) of such personal data by the operator to an unlimited number of persons, and prohibitions on processing or conditions of processing (except for obtaining access) of such personal data by an unlimited number of persons.

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

7.7. Silence or inaction of the personal data subject under no circumstances may be considered consent to processing of personal data permitted by the personal data subject for dissemination.

7.8. The Operator shall, no later than three business days from the date of receipt of the relevant consent of the personal data subject, publish information on the conditions of processing and on the existence of prohibitions and conditions for processing personal data permitted for dissemination by an unlimited number of persons.

7.9. Transfer (dissemination, provision, access) of personal data permitted by the personal data subject for dissemination must be terminated at any time at the request of the personal data subject. The consent of the personal data subject to processing of personal data permitted by the personal data subject for dissemination terminates from the moment the Operator receives the request.

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

7.11. The condition for termination of processing of personal data may be achievement of the purposes of processing of personal data, loss of necessity to achieve such purposes, expiration of the consent period, withdrawal of consent by the personal data subject for processing of his/her personal data, as well as detection of unlawful processing of personal data.

7.12. Upon achievement of the purposes of processing personal data or in case of loss of necessity to achieve the purposes of processing, as well as in case of detection of unlawful processing of personal data or withdrawal of consent by the

personal data subject for processing of his/her personal data, personal data shall be destroyed within the time limits established by the legislation of the Russian Federation, if:

7.12.1. Otherwise is not provided by an agreement to which the personal data subject is a party,

beneficiary or guarantor;

7.12.2. The Company is not entitled to process without the consent of the personal data subject on the grounds provided by 152-FZ or other federal laws;

7.12.3. Otherwise is not provided by another agreement between the Company and the personal data subject.

7.13. Retention periods for personal data on paper media, upon achievement of the purposes of their processing, are determined in accordance with the "List of Standard Administrative Archival Documents Generated in the Course of Activities of State Authorities, Local Self-Government Bodies and Organizations, with Indication of Their Retention Periods", approved by Order of the Federal Archival Agency dated 20 December 2019 No. 236.

7.14. Retention periods for personal data processed in personal data information systems correspond to the retention period for personal data on paper media.

8. RIGHTS OF THE PERSONAL DATA SUBJECT

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

8.1.1. Confirmation of the fact of processing of personal data by the Company;

8.1.2. Legal grounds and purposes of processing personal data;

8.1.3. Purposes and methods of processing personal data used by the Company;

8.1.4. Name and location of the Company, information on persons (except employees of the Company) who have access to personal data or to whom personal data may be transferred or disclosed on the basis of an agreement with the Company or on the basis of a federal law;

8.1.5. List and categories of processed personal data relating to the relevant subject, the source of their receipt, unless another procedure is provided by federal law;

8.1.6. Time limits for processing personal data, including retention periods;

8.1.7. Procedure for exercising the rights provided by 152-FZ;

8.1.8. Information on cross-border transfer of personal data carried out or intended;

8.1.9. Name or surname, name, patronymic and address of the person processing personal data on behalf of the Company, if processing is or will be entrusted;

8.1.10. Existence of an exclusively automated decision-making process by the Company regarding processing of personal data;

8.1.11. Information on methods of fulfillment by the Company of obligations established by Article

18.1 of 152-FZ;

8.1.12. Other information provided by 152-FZ or other federal laws.

8.2. The right of the personal data subject to receive information concerning processing of their personal data may be restricted in cases established by 152-FZ.

8.3. The information specified in clause 8.1 of this Policy is provided by the Operator to the personal data subject or their representative upon receipt of a request or inquiry of the personal data subject.

8.4. A request sent to the Operator must contain the number of the main identity document of the personal data subject or his/her representative, information on the date of issuance of such document and the issuing authority, information confirming the participation of the personal data subject in relations with the Operator (agreement number, date of conclusion, conditional verbal designation and/or other information), or information otherwise confirming the fact of processing of personal data by the Operator, as well as the signature of the personal data subject or his/her representative. The request may be sent as an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation. The Operator provides information to the personal data subject or his/her representative in the same form in which the relevant request was sent, unless otherwise specified in the request.

8.5. The personal data subject has the right to re-apply to the Operator or send a repeated request in order to obtain the information specified in clause 8.1 of this Policy no earlier than thirty days after the initial application or initial request, unless a shorter period is established by federal law, a normative legal act adopted in accordance therewith, or an agreement to which the personal data subject is a party, beneficiary or guarantor.

8.6. The personal data subject has the right to require correction of his/her personal data in case inaccuracies are discovered in the composition of personal data processed by the Operator or the Processor on behalf of the Operator, and also to make additions to personal data, including by providing an additional statement.

8.7. The personal data subject has the right to withdraw his/her consent to processing of personal data and to require deletion of his/her personal data from the Operator's or Processor's systems if personal data are no longer required for the purposes for which they were obtained and the Company or Processor has no lawful grounds for processing his/her data.

8.8. The personal data subject has the right to require restriction of processing of his/her personal data for the purposes of the Company's advertising offers.

8.9. The personal data subject has the right to submit to the Operator a request to terminate the transfer (dissemination, provision, access) of his/her personal data previously permitted by the personal data subject for dissemination.

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

8.11. An application by the personal data subject or his/her representative for the purpose of exercising their rights established by 152-FZ is made in writing upon presentation of an identity document of the personal data subject (except where the application is made 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 application by a representative - upon 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.

8.12. The personal data subject or his/her representative has the right to submit a claim to the Company on issues of processing personal data using the details specified in Section 13 of this Policy or published on the official website of the Company on the Internet at <https://neurosoft.com/ru/contacts>.

9. OBLIGATIONS OF THE COMPANY AS THE OPERATOR

9.1. In cases established by the legislation of the Russian Federation in the field of personal data, the Company shall, free of charge, provide to the personal data subject or his/her legal representative (upon request) the information provided in clause 8.1 of this Policy.

9.2. When collecting personal data, including via the Internet information and telecommunications network, the Company ensures the recording, systematization, accumulation, storage, updating (modification), extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation.

9.3. The Company has other obligations established by the legislation of the Russian Federation.

9.4. The Company independently determines the composition and list of measures necessary and sufficient to ensure fulfillment of obligations provided by 152-FZ and normative legal acts adopted thereunder, unless otherwise provided by 152-FZ or other federal laws.

9.5. The Company provides access to this Policy to an indefinite number of persons, including via the official website of the Company on the Internet at <https://neurosoft.com/en> (and other information resources and services of the Company on the Internet).

9.6. The Company takes the following measures to ensure fulfillment of obligations provided by 152-FZ in the field of processing personal data:

9.6.1. A person responsible for organizing processing of personal data has been appointed;

9.6.2. Local acts on processing personal data are issued, defining for each purpose of processing personal data the categories and list of processed personal data,

time limits for processing and retention, the procedure for destruction upon achievement of processing purposes or upon other lawful grounds, as well as local acts aimed at preventing and detecting violations of the legislation of the Russian Federation and eliminating consequences of such violations;

9.6.3. A set of legal, organizational and technical measures to ensure the security of personal data is applied in accordance with Article 19 of the Federal Law, aimed at neutralizing relevant threats to the security of personal data when processed in the Company's personal data information systems;

9.6.4. An assessment is conducted of the harm that may be caused to personal data subjects in case of violation of 152-FZ, and the correlation between such harm and the measures taken by the Company to ensure fulfillment of obligations provided by 152-FZ;

9.6.5. Internal control and/or audit is carried out to verify compliance of processing personal data with 152-FZ and normative legal acts adopted thereunder, requirements for protection of personal data, the Company's policy on processing personal data, local acts in the field of processing and ensuring the security of personal data;

9.6.6. Analysis of products and processes being created in the Company is carried out to ensure proper processing of personal data;

9.6.7. Employees directly processing personal data are familiarized with the provisions of the legislation of the Russian Federation on personal data, including requirements for protection of personal data, documents defining the Company's policy on processing personal data, the Company's local acts on processing personal data, and/or such employees are trained.

9.7. Upon request of a personal data subject, the Company provides to the personal data subject or his/her legal representative information regarding processing of his/her personal data (upon the relevant request or inquiry) in an accessible form that does not contain personal data of other persons.

9.8. The Company considers an application of a personal data subject and provides to the personal data subject or his/her representative the information specified in clause 8.1 of this Policy within ten business days from the date of application or receipt of the request of the personal data subject or his/her representative. Such period may be extended, but not more than by five business days, if the Company sends to the personal data subject a reasoned notice indicating the reasons for extending the period for providing the requested information. The Company provides information to the personal data subject or his/her representative in the same form in which the relevant application or request was sent, unless otherwise specified therein.

9.9. In case of refusal to provide information on the existence of personal data relating to the relevant subject, or to provide personal data to the personal data subject or his/her representative upon their application or request, the Company shall provide

a reasoned written response with reference to the provision of Part 8 of Article 14 of 152-FZ or another federal law constituting the basis for such refusal, within a period not exceeding ten business days from the date of application or from the date of receipt of the request. Such period may be extended, but not more than by five business days, if the Operator sends to the personal data subject a reasoned notice indicating the reasons for extending the period for providing the requested information.

9.10. The Company shall provide to the authorized body for protection of the rights of personal data subjects, upon request of such body, necessary information within ten business days from the date of receipt of such request. Such period may be extended, but not more than by five business days, if the Operator sends to the authorized body a reasoned notice indicating the reasons for extending the period for providing the requested information.

9.11. If unlawful processing of personal data is revealed upon application/request of the personal data subject or his/her representative, or upon request of the authorized body for protection of the rights of personal data subjects, the Operator shall block unlawfully processed personal data relating to such subject or ensure their blocking (if processing is carried out by a Processor acting on behalf of the Operator) from the moment of such application/request for the period of verification.

9.12. If inaccurate personal data are revealed upon application/request of the personal data subject or his/her representative, or upon request of the authorized body, the Operator shall block personal data relating to such subject or ensure their blocking (if processing is carried out by a Processor acting on behalf of the Operator) from the moment of such application/request for the period of verification, if blocking does not violate the rights and legitimate interests of the personal data subject or third parties.

9.13. If the fact of inaccuracy of personal data is confirmed, the Operator, based on information provided by the personal data subject or his/her representative, the authorized body, or other necessary documents, shall update personal data or ensure their updating (if processing is carried out by a Processor acting on behalf of the Operator) within seven business days from the date of submission of such information and remove blocking.

9.14. If the fact of unlawful or accidental transfer (provision, dissemination, access) of personal data resulting in violation of the rights of personal data subjects is established, the Operator shall, from the moment the incident is identified by the Operator, the authorized body, or another interested person, notify the authorized body for protection of the rights of personal data subjects:

9.14.1. Within twenty-four hours - about the incident, the alleged causes that led to violation of the rights of personal data subjects, the alleged harm caused, the measures taken to eliminate the consequences of the incident, as well as provide

information about the person authorized by the operator to interact with the authorized body on issues related to the identified incident;

9.14.2. Within seventy-two hours - about the results of the internal investigation of the identified incident, and also provide information about persons whose actions caused the incident (if any).

9.15. Upon achievement of the purpose of processing personal data, the Operator shall terminate processing of personal data or ensure its termination (if processing is carried out by a Processor acting on behalf of the Operator) and destroy personal data or ensure their destruction (if processing is carried out by a Processor acting on behalf of the Operator) within a period not exceeding thirty days from the date of achievement of the purpose, unless otherwise provided by an 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 process personal data without consent on the grounds provided by 152-FZ or other federal laws.

9.16. Upon withdrawal by the personal data subject of consent to processing of his/her personal data, the Operator shall terminate processing or ensure termination (if processing is carried out by a Processor acting on behalf of the Operator) and, if retention is no longer required for the purposes of processing, destroy personal data or ensure their destruction (if processing 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 such withdrawal, unless otherwise provided by an 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 process personal data without consent on the grounds provided by 152-FZ or other federal laws.

9.17. If the personal data subject submits to the Operator a request to terminate processing of personal data, the Operator shall, within a period not exceeding ten business days from the date of receipt of such request, terminate processing or ensure termination (if processing is carried out by a person processing personal data), except for cases provided by items 2-11 of Part 1 of Article 6, Part 2 of Article 10 and Part 2 of Article 11 of this Federal Law. Such period may be extended, but not more than by five business days, if the Operator sends to the personal data subject a reasoned notice indicating the reasons for extending the period for providing the requested information.

9.18. If it is impossible to destroy personal data within the periods specified in clauses 9.8-9.11 of this Policy, the Company blocks such personal data or ensures their blocking (if processing is carried out by another person acting on behalf of the Operator) and ensures destruction of personal data within a period not exceeding six months, unless another period is established by federal laws.

10.3.3. Information security tools that have passed the established conformity assessment procedure are applied and are intended to neutralize relevant security threats;

10.3.4. Effectiveness of measures taken to ensure the security of personal data is assessed prior to commissioning a personal data information system;

10.3.5. Machine media containing personal data are accounted for;

10.3.6. Measures are carried out to detect facts of unauthorized access to personal data and to take appropriate measures, including measures to detect, prevent and eliminate consequences of computer attacks on personal data information systems and to respond to computer incidents therein;

10.3.7. The ability to restore personal data modified or destroyed as a result of unauthorized access is ensured;

10.3.8. Rules of access to personal data processed in a personal data information system are established, and registration and accounting of actions performed with personal data in such system are ensured;

10.3.9. 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 processing of personal data that resulted in unlawful transfer (provision, dissemination, access) of personal data, the Company, in the manner determined by the FSB of Russia, shall ensure interaction with the state system for detection, prevention and elimination of consequences of computer attacks on the information resources of the Russian Federation, including notification thereof about computer incidents in order to minimize consequences of incidents for personal data subjects and prevent them in the future.

11. LIABILITY

11.1. Control over compliance with the requirements of this Policy is carried out by the person responsible for organizing the processing of personal data.

11.2. Persons guilty of violating the rules regulating processing and protection of personal data processed in the Company bear full liability provided by the applicable legislation of the Russian Federation.

12. FINAL PROVISIONS

12.1. Unlimited access to this Policy is ensured for all interested persons, including personal data subjects and state authorities performing control and supervision functions in the field of personal data.

12.2. This Policy enters into force from the moment of its approval and is valid indefinitely. All amendments to the Policy are made by separate acts of the Company.

13. DETAILS AND CONTACT INFORMATION

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INN: 3729002450.

KPP: 370201001.

OGRN: 1033700080721.

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E-mail: info@neurosoft.com