

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

1. General Provisions

1.1. This policy (hereinafter – the “Policy”) on the processing and protection of personal data at Neurosoft LLC (hereinafter – the “LLC”, the “Operator”) has been developed in accordance with the requirements of Part 2 of Article 18.1 of Federal Law No. 152-FZ of 27 July 2006 “On Personal Data” (hereinafter – “Law 152-FZ”) and other regulations and normative documents of the regulatory and supervisory authorities of the Russian Federation.

1.2. This Policy defines the purposes, content and procedure of processing, as well as the measures aimed at protecting the personal data of individuals or their legal representatives (personal data subjects) in connection with employment relations, pre-contractual activities, the conclusion of contracts and the performance of contractual obligations, the information technology support of the LLC’s operations, the exercise of the LLC’s rights and legitimate interests, the exercise and performance of the functions, powers and obligations imposed on the LLC by the legislation of the Russian Federation, in the course of the LLC’s statutory and business activities.

1.3. Personal data constitutes confidential information and must be protected against unauthorized access, including accidental access. The LLC and any other persons who have obtained access to personal data are obliged not to disclose personal data to third parties and not to disseminate personal data without the consent of the personal data subject, unless otherwise provided by the applicable legislation of the Russian Federation.

1.4. Personal data is processed by the LLC in compliance with the principles and conditions set out in this Policy and in the legislation of the Russian Federation on personal data.

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

1.6. All persons authorized to process personal data are required to familiarize themselves with and comply with this Policy.

1.7. Pursuant to an order of the Federal Service for Supervision of Communications, Information Technology and Mass Media, the LLC has been entered in the register of operators carrying out the processing of personal data (hereinafter – the “Operator”).

1.8. This Policy is reviewed and updated in the event of changes to the applicable legislation of the Russian Federation on personal data, changes in the purposes of processing or in the categories of personal data subjects, 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 its processing in personal data information systems.

1.9. Unrestricted access to the current version of the Policy is provided to data subjects by publishing its electronic version on the LLC’s official website on the Internet at <https://neurosoft.com/en> (and on other online information resources and services of the LLC), as well as in hard copy at the security posts on the LLC’s premises.

1.10. In all other matters not covered by this Policy, the LLC is governed 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 natural person (personal data subject).

Personal data permitted by the personal data subject for dissemination – personal data to which access by an unlimited number of persons has been granted 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 prescribed by the Federal Law.

LLC (Operator) – Neurosoft, Limited Liability Company, including its structural units and their employees (INN (Taxpayer Identification Number) 37290024501, OGRN (Principal State Registration Number) 1033700080721, located at: 5 Voronina St., Ivanovo, 153032, Russian Federation);

Operator – a state authority, municipal authority, legal entity or natural person that, alone or jointly with other persons, organizes and/or carries out the processing of personal data and determines the purposes of the processing of personal data, the scope of personal data to be processed, and the actions (operations) performed with personal data.

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

Processor – a state authority, municipal authority, legal entity or natural person that processes personal data on behalf of the operator on the basis of a contract concluded with the operator, including a state or municipal contract, or on the basis of the operator's instruction.

Automated processing of personal data – processing of personal data by means of computer technology.

Dissemination of personal data – actions aimed at disclosing personal data to an indefinite number of persons.

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

Blocking of personal data – temporary suspension of the processing of personal data (except where processing is necessary to clarify the personal data).

Destruction of personal data – actions as a result of which it becomes impossible to restore the content of the personal data in the personal data information system and/or as a result of which the physical media containing the personal data are destroyed.

Personal data security threat – a set of conditions and factors creating a risk of unauthorized access, including accidental access, to personal data that may result in the destruction, modification, blocking, copying, provision or dissemination of personal data, or other unlawful actions during its processing in a personal data information system.

Personal data protection level – a composite indicator characterizing the requirements whose fulfilment ensures the neutralization of specific threats to the security of personal data during its processing in personal data information systems.

Depersonalization (anonymization) of personal data – actions as a result of which it becomes impossible, without the use of additional information, to attribute personal data to a specific personal data subject.

Personal data information system – a set of personal data contained in databases together with the information technologies and technical means ensuring its processing.

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

Person responsible for organizing the processing of personal data – an official ap-

pointed by order of the President of the LLC who organizes the adoption of legal, organizational and technical measures to ensure the proper performance of the functions related to organizing the processing of personal data in accordance with the provisions of the legislation of the Russian Federation on personal data.

Confidentiality of personal data – a requirement, binding on the LLC or any other person who has obtained access to personal data, not to disclose personal data to third parties and not to disseminate personal data without the consent of the personal data subject or another legal ground provided for by federal law.

3. Purposes and Legal Grounds for the Processing of Personal Data

3.1. The LLC processes personal data in performance of the functions, powers and obligations imposed on the LLC by the legislation of the Russian Federation, including 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, and other state bodies.

3.2. The LLC processes personal data for the following purposes:

3.2.1. Managing relations with employees (assistance in employment, HR records management (including electronic records), accounting, training and career advancement, ensuring personal safety, monitoring the quantity and quality of work performed, safeguarding property, payment of wages and other amounts due to employees, sending employees on business trips for negotiations and participation in exhibitions, seminars and conferences, holding corporate events, compiling reference materials, publishing information on the Operator's information resources and in its printed publication, providing an online communication and information exchange service, issuing electronic signatures and machine-readable powers of attorney, providing access to resources and services);

3.2.2. Managing relations with customers and counterparties (pre-contractual activities, conclusion and performance of contracts, order processing, payment for and release of finished products, procurement of components, after-sales service, provision of technical support, obtaining feedback to improve the quality of manufactured products);

3.2.3. Holding conferences, seminars, webinars, lectures and training courses for customers (potential customers) on the use of the manufactured products at the LLC's premises or via Internet videoconferencing services;

3.2.4. Managing activities under civil-law contracts (performance of works (services) in the interests of the LLC);

3.2.5. Managing relations with partners (dealers, agents) for the sale of manufactured products, the provision of technical support and after-sales service;

3.2.6. Information technology support of the LLC's activities using the Internet information and communications network (conducting marketing research, interaction in the promotion of goods, works and services on the market, brand promotion and raising interest in the medical technology industry);

3.2.7. Providing customers (customer representatives) with electronic services granting access to the LLC's information resources and services (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. Recruiting personnel (job applicants) for vacant positions and maintaining a personnel reserve;

3.2.9. Enabling students to undertake practical or pre-graduation internships at the LLC's production facilities under agreements concluded between the LLC and higher education institutions;

3.2.10. Maintaining access control on the LLC's premises

- 3.2.11. Interacting with representatives of state organizations and supervisory authorities in the event of their requests to the LLC, as well as during scheduled (unscheduled) inspections or audits of the LLC's compliance with applicable legislation and the normative documents of the regulatory and supervisory authorities of the Russian Federation;
- 3.2.12. Interacting with other persons (applicants) when handling enquiries.
- 3.3. The legal grounds for the processing of personal data by the LLC 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 Labour Code of the Russian Federation.
 - 3.3.5. Federal Law No. 152 of 27.07.2006 "On Personal Data".
 - 3.3.6. Federal Law No. 149 of 27.07.2006 "On Information, Information Technologies and Information Protection".
 - 3.3.7. Federal Law No. 27-FZ of 01.04.1996 "On Individual (Personalized) Records in the Compulsory Pension Insurance System".
 - 3.3.8. Federal Law No. 402-FZ of 06.12.2011 "On Accounting".
 - 3.3.9. Federal Law No. 53-FZ of 28.03.1998 "On Military Duty and Military Service".
 - 3.3.10. Resolution of the Government of the Russian Federation No. 687 of 15.09.2008 "On Approval of the Regulation on the Specifics of Personal Data Processing Carried Out Without the Use of Automation Tools".
 - 3.3.11. The Articles of Association of the LLC.
 - 3.3.12. Other regulations and normative legal documents of the regulatory and supervisory authorities of the Russian Federation.

4. Principles and Conditions for the Processing of Personal Data

- 4.1. Personal data is processed by the LLC on the basis of the following principles:
 - 4.1.1. Existence of legal grounds for the processing of personal data.
 - 4.1.2. Limitation of the processing of personal data to the achievement of specific, predetermined and legitimate purposes.
 - 4.1.3. Prohibition of the combining of databases containing personal data processed for purposes that are incompatible with each other.
 - 4.1.4. Processing of only those personal data that meet the purposes of their processing.
 - 4.1.5. Correspondence of the content and scope of the personal data processed to the stated purposes of processing (avoidance of excessiveness).
 - 4.1.6. Ensuring the accuracy of personal data, its sufficiency and, where necessary, its relevance to the purposes of the processing of personal data.
 - 4.1.7. Personal data is stored in a form that makes it possible to identify the personal data subject for no longer than is required by the purposes of the processing of personal data, unless the retention period for the personal data is established by the legislation of the Russian Federation or by a contract to which the personal data subject is a party, beneficiary or guarantor.
- 4.2. Personal data may be processed by the LLC in the following cases:
 - 4.2.1. The processing of personal data is carried out with the consent of the personal data subject to the processing of their personal data;
 - 4.2.2. The processing of personal data is necessary to achieve the purposes provided for by an international treaty of the Russian Federation or by law, or to exercise and perform the functions, powers and obligations imposed on the operator by the legislation of the Russian Federation;
 - 4.2.3. The processing of personal data is carried out in connection with the personal data subject's participation in constitutional, civil, administrative or criminal proceedings, or proceedings in arbitrazh (commercial) courts (for the enforcement of a judicial act in accordance with the leg-

isolation of the Russian Federation on enforcement proceedings);

4.2.4. The processing of personal data is necessary for the exercise of the powers of federal executive authorities, bodies of state extra-budgetary funds, executive authorities of the constituent entities of the Russian Federation and local self-government bodies, and the functions of organizations involved in the provision of state and municipal services, respectively;

4.2.5. The processing of personal data is necessary for the performance of a contract to which the personal data subject is a party, beneficiary or guarantor, as well as for the conclusion of a contract at the initiative of the personal data subject or of a contract under which the personal data subject will be a beneficiary or guarantor. A contract concluded with a personal data subject may not contain provisions restricting the rights and freedoms of the personal data subject, provisions establishing cases of processing of the personal data of minors (unless otherwise provided by the legislation of the Russian Federation), or provisions allowing the personal data subject's inaction to serve as a condition for the conclusion of the contract;

4.2.6. The processing of personal data is necessary to protect the life, health or other vital interests of the personal data subject where obtaining the consent of the personal data subject is impossible;

4.2.7. The processing of personal data is necessary for the exercise of the rights and legitimate interests of the Operator or of third parties, or for the achievement of socially significant purposes, provided that the rights and freedoms of the personal data subject are not thereby violated;

4.2.8. The processing of personal data is necessary for the carrying out of scientific, literary or other creative activities, provided that the rights and legitimate interests of the personal data subject are not thereby violated;

4.2.9. The processing of personal data is carried out for statistical or other research purposes, subject to the mandatory depersonalization (anonymization) of the personal data;

4.2.10. The personal data processed is subject to publication or mandatory disclosure in accordance with the legislation of the Russian Federation.

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 a contract concluded with that party and an instruction of the Operator. In doing so, the Processor is obliged to comply with the principles and rules for the processing of personal data set out in Law 152-FZ, to maintain the confidentiality of personal data and to take the necessary measures aimed at ensuring its security. The Operator's instruction must 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 the processing;

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

4.4. A Processor processing personal data on behalf of the Operator is not required to obtain the data subject's consent to the processing of their personal data.

4.5. Where the Operator entrusts the processing of personal data to a Processor, the Operator is liable to the personal data subject for the actions of the Processor, while the Processor processing personal data on behalf of the Operator is liable to the Operator.

4.6. Where the Operator entrusts the processing of personal data to a Processor that is a foreign natural person or a foreign legal entity, both the Operator and the Processor are liable to the personal data subject for the actions of such Processors.

4.7. For information support purposes, the LLC may create publicly available sources of per-

sonal data (including directories and address books). With the written consent of the personal data subject, such publicly available sources of personal data may include the subject's surname, first name, patronymic, year and place of birth, address, subscriber number, information about their profession, and other personal data provided by the personal data subject.

4.8. LLC employees authorized to process personal data are obliged to:

4.8.1. Know and strictly comply with the provisions of the legislation of the Russian Federation on personal data, this Policy, and the LLC's internal regulations on the processing and security of personal data;

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

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

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

4.8.5. Report to the Person responsible for organizing the processing of personal data any actions of other persons that may lead to a violation of the provisions of this Policy, as well as any known violations of the requirements of this Policy.

5. Categories of Data Subjects and Scope of Personal Data Processed

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

Category of subjects	Scope of data processed
Individuals who are or were previously in employment or other civil-law relations with the LLC, and/or their legal representatives (employees, former employees, close relatives of employees and/or former employees)	Surname, first name, patronymic (if any); date of birth; sex; citizenship; place of birth; marital status; social status; property status, income; registration and residential address; telephone numbers, e-mail addresses, identifiers in social networks and messengers; SNILS (individual insurance account number); INN (taxpayer identification number); identity document details; details of the document certifying identity outside the Russian Federation; driving licence details; military service status, military registration details; marriage certificate; information about change of full name; information about children, including a child's birth certificate; information about dependent relatives; pension and medical insurance details; information about social and other benefits; information about awards and incentives, honorary titles, state and departmental awards; disability information; information about tax relief; information about writs of execution and alimony payments; information about wages and other income received in the performance of work duties; bank details for the transfer of funds (bank card number, settlement account number, personal account number); information about education, name of educational institution; profession, position, department; information about work activity (including length of service and current employment details indicating the name and settlement account of the organization); information on hiring, transfer and dismissal; photo and video images; training and testing results; results of the special assessment of working conditions (SOUT); information on professional development and completed training, supporting

	certificates and credentials; information about vacations; information on bonus categories, bonus coefficients and amounts; personnel number; date of taking up the position; results of assessment activities; information on the presence/absence of a criminal record (where legal grounds exist); information on previous places of work and length of service; electronic signature and machine-readable power of attorney data; other information that the data subject has chosen to provide about themselves and that meets the processing purpose specified in clause 3.2.1 of this Policy
Individuals (employees of customers and counterparties) in the course of pre-contractual activities and for the conclusion and performance of contractual obligations	Surname, first name, patronymic (if any); e-mail address; telephone number; name of organization, profession, position; country, location address, postal address, organization details; other information that the data subject has chosen to provide about themselves and that meets the processing purpose specified in clause 3.2.2 of this Policy
Individuals attending lectures, seminars, webinars, conferences and training courses on the LLC's products held by the LLC	Surname, first name, patronymic (if any); e-mail address; telephone number; messenger nickname; name of organization, profession, position; country, location address, postal address, organization details; other information that the data subject has chosen to provide about themselves and that meets the processing purpose specified in clause 3.2.4 of this Policy
Individuals performing works (services) in the interests of the LLC under civil-law contracts	Surname, first name, patronymic (if any); passport details or other identity document; SNILS; INN; work permit or patent, when concluding a contract with a citizen of another state; other information that the data subject has chosen to provide about themselves and that meets the processing purpose specified in clause 3.2.3 of this Policy
Individuals (representatives of legal entities and individual entrepreneurs) acting as representatives of the LLC under concluded contracts (agents, dealers)	Surname, first name, patronymic (if any); e-mail address; telephone number; name of organization, profession, position; country, location address, postal address, organization details; identity document details; SNILS; INN; bank details for the transfer of funds (settlement account number; personal account number); other information that the data subject has chosen to provide about themselves and that meets the processing purpose specified in clause 3.2.5 of this Policy
Individuals visiting the LLC's website on the Internet information and telecommunications network	Cookies; information collected by means of web analytics (metric) programs; other information that the data subject provides in 'forms' on the websites and that meets the processing purpose specified in clause 3.2.6 of this Policy
Individuals (customer representatives and their employ-	Surname, first name, patronymic (if any); e-mail address; telephone number; name of organization, profession, posi-

ees) using the LLC's services and resources hosted on the Internet information and telecommunications network	tion; country; cookies; information collected by means of web analytics (metric) programs; registration and authorization data (login, password), technical information about user devices, identifiers and other technical information; other information that the data subject has chosen to provide about themselves and that meets the processing purpose specified in clause 3.2.7 of this Policy
Individuals (job applicants), candidates for vacant positions	Surname, first name, patronymic (if any); date of birth; e-mail address, telephone number; profession; position; information about work activity (including length of service and current employment details indicating the name of the organization); information collected by means of web analytics (metric) programs (when visiting the LLC's website); information about education; speciality; other information that the subject has indicated in their CV and that meets the processing purpose specified in clause 3.2.8 of this Policy
Individuals (students of higher education institutions) undertaking practical internships at the LLC under agreements concluded between the LLC and higher education institutions	Surname, first name, patronymic (if any); e-mail address, telephone number; identity document details; name of educational institution, year of study, speciality (for students and learners); other information that the data subject has chosen to provide about themselves and that meets the processing purpose specified in clause 3.2.9 of this Policy
Individuals issued single-visit and temporary passes when visiting the LLC	Surname, first name, patronymic (if any); identity document details; other information that the data subject has chosen to provide about themselves and that meets the processing purpose specified in clause 3.2.10 of this Policy
Individuals who are representatives of state and supervisory authorities, in the event of their requests to the LLC, as well as during scheduled (unscheduled) inspections or audits of the LLC's compliance with applicable legislation and the normative documents of the regulatory and supervisory authorities of the Russian Federation	Surname, first name, patronymic (if any); name of the state or supervisory authority; department; position; identity document details; other information that the data subject has chosen to provide about themselves and that meets the processing purpose specified in clause 3.2.11 of this Policy
Individuals submitting enquiries to the LLC (applicants)	Surname, first name, patronymic (if any); identity document details; postal address; other information that the data subject has chosen to provide about themselves and that meets the processing purpose specified in clause 3.2.12 of this Policy

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

5.3. The LLC does not process biometric personal data or special categories of personal data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, or intimate life. Should the processing of the above categories of personal data become necessary, such processing is possible only with the written consent of the personal data subject, except in the cases provided for by the legislation of the Russian Federation.

5.4. Personal data permitted by the personal data subject for dissemination is processed by the LLC on the basis of the personal data subject's consent and in compliance with the prohibitions and conditions on the processing of personal data established by the personal data subject.

5.5. Depersonalized (anonymized) personal data (cookies, information collected by web analytics (metric) programs) of visitors to the LLC's websites and users of the LLC's online services is processed by the LLC with the consent of such website visitors and service users for the purposes of improving the quality of customer service, the usability of the LLC's websites and online services, analysing their traffic and ensuring their safe use. The processing of depersonalized personal data is governed by the LLC's internal documents published on the relevant website or service (rules, policies) and by the rules of our partners providing these services.

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 LLC may engage third parties and transfer personal data to them on the basis of an instruction for the purposes specified above in this Policy.

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

Third party, its location, link to Privacy Policy / website (if applicable)	Purpose of transfer	Address of the Third Party
Yandex LLC (Russia) Privacy Policy: https://yandex.ru/legal/confidential/ru/	Collection of web analytics in the interests of the LLC using the Yandex.Metrica service	16 Lva Tolstogo St., Moscow, 119021, Russian Federation
UniSender Rus LLC (Russia) Privacy Notice: https://www.unisender.com/ru/privacy-notice/	Sending of advertising and marketing communications	23 Bolshaya Novodmitrovskaya St., fl./prem. 2/46, Moscow, 127015, Russian Federation
Calltouch Solutions LLC (Russia) User Agreement: https://www.calltouch.ru/upload/documents/ Personal Data Processing Policy: https://www.calltouch.ru/privacy_policy.pdf Privacy Policy: https://www.calltouch.ru/privacy_policy_new.pdf	Use of the "Callback" service (service widget on the company's website)	1 Skladochnaya St., bldg. 9, premises 3/1, Butyrsky Municipal District, Moscow, 127018, Russian Federation

HeadHunter LLC (Russia) User Agreement: https://hh.ru/article/28949 Policy on the Processing and Security of Personal Data: https://hh.ru/article/personal_data Privacy Policy: https://talantix.ru/promo/confidential	Use of a CRM system for recruitment automation	48 2nd Brestskaya St., premises 25, Tverskoy Municipal District, Moscow, 125047, Russian Federation
Regional Network Information Center (RU-CENTER) (Russia) Policy on the Processing of Personal Data and Implementation of Personal Data Protection Requirements: https://www.nic.ru/help/	Provision of hosting services (hosting of the LLC's websites on the hosting provider's facilities)	2 3rd Khoroshevskaya St., bldg. 1, Moscow, 123308, Russian Federation
Yandex.Cloud LLC (Russia) Offer for the Use of the "Yandex.Cloud Platform" Services: https://yandex.ru/legal/cloud_oferta/ru/ Special Terms of Use of the "Yandex.Cloud Platform" Services: https://yandex.ru/legal/cloud_specialterms/ru/ User Agreement: https://yandex.ru/legal/rules/ru/ Privacy Policy: https://yandex.ru/legal/confidential/ru/ Data Processing Agreement: https://yandex.ru/legal/cloud_dpa/ru/	Provision of 152-FZ-certified cloud infrastructure for hosting the LLC's services (the collection and further processing of personal data on servers)	16 Lva Tolstogo St., room 528, Moscow, 119021, Russian Federation
1C-Online LLC (Russia) Policy on the Processing and Protection of Personal Data: https://online.1c.ru/privacy_policy/	Provision of access to the "1C:Cloud Platform" personal data information system when using the electronic HR document management (KEDO) service	26A Klary Tsetkin St., bldg. 2, fl./room 1/8, Moscow, 125130, Russian Federation
VK LLC (Russia) VK LLC legal documents: https://cloud.vk.com/docs/ru/start/legal/vk Privacy Policy of the "VK Cloud" platform: https://cloud.vk.com/docs/ru/start/legal/digital-cloud/policy-privacy	Provision of 152-FZ-certified cloud infrastructure when using the electronic HR document management (KEDO) service	39 Leningradsky Prospekt, bldg. 79, Moscow, 125167, Russian Federation

Tilda Publishing JSC (Russia) User Agreement: https://tilda.ru/ru/terms/#personal-data Policy on the Processing of Personal Data: https://tilda.ru/ru/dpa/ Privacy Policy: https://tilda.ru/ru/privacy/	The collection and further processing of personal data on servers	2 Petrovskie Linii Street, room 4/1, Moscow, 107031, Russian Federation
Selectel JSC (Russia) User Agreement: https://selectel.ru/about/documents/user-agreement/ Policy on the Processing of Personal Data: https://files.selectel.ru/docs/ru/personal-data-processing-and-protection-policy.pdf Terms and Conditions of Use: https://files.selectel.ru/docs/ru/terms-of-use-for-services.pdf	Provision of cloud infrastructure certified in accordance with Federal Law No. 152-FZ for hosting the limited liability company's website (collection and further processing of personal data on the servers).	21 Tsvetochnaya Street, Block A, St. Petersburg, 196006, Russian Federation
Yandex 360 for Business LLC (Russia) User Agreement for Yandex Services: https://yandex.ru/legal/rules/ru/ Privacy Policy: https://yandex.ru/legal/confidential/ru/ Licence Agreement for the "Yandex Telemost" application: https://yandex.ru/legal/telemost_mobile_agreement/ru/ Licence Agreement for the "Yandex Messenger" program: https://yandex.ru/legal/messenger_termsofuse/ru/	Provision of a videoconferencing service and of an online communication and information exchange service	11 Timura Frunze St., bldg. 44, Moscow, 119021, Russian Federation

7. Procedure and Conditions for the Processing of Personal Data

7.1. Personal data is processed by the LLC by mixed means, both with and without the use of automation tools. Personal data is processed both on physical (paper) media and in electronic form (in personal data information systems and on machine-readable media), with transmission over the internal network and/or via the Internet information and telecommunications network. When processing personal data without the use of automation tools, the LLC follows the rules established by Resolution of the Government of the Russian Federation No. 687 of 15.09.2008 "On Approval of the Regulation on the Specifics of Personal Data Processing Carried Out Without the Use of Automation Tools".

7.2. The following actions are performed in the course of the processing of personal data: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (dissemination, provision, access), blocking, deletion, destruction.

7.3. Personal data is processed under the conditions established by Article 6 of Law 152-FZ, in compliance with the personal data confidentiality requirements established by Article 7 of Law 152-FZ, and with the adoption of measures aimed at ensuring the fulfilment of the obligations relating to the processing and protection of personal data. In doing so:

7.3.1. The processing of special categories of personal data and biometric personal data, and the cross-border transfer of personal data, may be carried out only with the written consent of the

personal data subject executed in accordance with Paragraph 4 of Article 9 of Law 152-FZ, or on another legal ground;

7.3.2. The personal data subject decides whether to provide their personal data and gives consent to its processing freely, of their own free will and in their own interest. Consent to the processing of personal data must be specific, substantive, informed, conscious and unambiguous. Consent to the processing of personal data must be executed separately from any 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 their legal representative in any form that makes it possible to confirm the fact of its receipt, unless otherwise established by Law 152-FZ. Where consent to the processing of personal data is obtained from the legal representative of the personal data subject, the Operator verifies that representative's authority to give consent on behalf of the personal data subject;

7.3.3. The burden of providing proof that the personal data subject's consent to the processing of their personal data has been obtained, or proof 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 Law 152-FZ, rests with the LLC as the Operator.

7.4. The written consent of the personal data subject to the processing of their personal data must include, in particular: 1) the surname, first name, patronymic and address of the personal data subject, the number of their primary identity document, and information on the date of issue of that document and the authority that issued it; 2) the surname, first name, patronymic and address of the representative of the personal data subject, the number of their primary identity document, information on the date of issue of that document and the authority that issued it, and the details of the power of attorney or other document confirming that representative's authority (where consent is obtained from the representative of the personal data subject); 3) the name, or the surname, first name, patronymic, and the address of the Operator obtaining the consent of the personal data subject; 4) the purpose of the processing of personal data; 5) the list of personal data to whose processing the personal data subject consents; 6) the name, or the surname, first name, patronymic, and the address of the person processing personal data on the Operator's behalf, if the processing will be entrusted to such a person; 7) the list of actions with personal data to which consent is given, and a general description of the processing methods used by the Operator; 8) the period for which the consent of the personal data subject is valid and the method of its withdrawal, unless otherwise established by federal law; 9) the signature of the personal data subject.

7.5. Personal data permitted by the personal data subject for dissemination is processed on the basis of a consent that is executed separately from the 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 No. 18 of 24.02.2021 "On Approval of the Requirements for the Content of Consent to the Processing of Personal Data Permitted by the Personal Data Subject for Dissemination". In this consent, the subject has the right to define the list of personal data for each category of personal data specified in the consent to the processing of personal data permitted by the personal data subject for dissemination, as well as to establish prohibitions on the transfer (except for the granting of access) of such personal data by the operator to an unlimited number of persons, and prohibitions on the processing, or conditions for the processing (except for obtaining access), of such personal data by an unlimited number of persons.

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

7.7. Under no circumstances may the silence or inaction of the personal data subject be deemed to constitute consent to the processing of personal data permitted by the personal data subject for dissemination.

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

7.9. The transfer (dissemination, provision, access) of personal data permitted by the personal data subject for dissemination must be discontinued at any time at the demand of the personal data subject. The validity of the personal data subject's consent to the processing of personal data permitted for dissemination ceases from the moment the Operator receives such demand.

7.10. The 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 Law 152-FZ.

7.11. Grounds for terminating the processing of personal data may include the achievement of the purposes of the processing of personal data or the loss of the need to achieve those purposes, the expiry or withdrawal of the personal data subject's consent to the processing of their personal data, and the discovery of unlawful processing of personal data.

7.12. Upon achievement of the purposes of the processing of personal data, or where the need to achieve the purposes of processing is lost, as well as where unlawful processing of personal data is discovered or the personal data subject withdraws consent to the processing of their personal data, the personal data is subject to destruction within the time limits established by the legislation of the Russian Federation, if:

7.12.1. Not otherwise provided by a contract to which the personal data subject is a party, beneficiary or guarantor;

7.12.2. The LLC is not entitled to carry out processing without the consent of the personal data subject on the grounds provided for by Law 152-FZ or other federal laws;

7.12.3. Not otherwise provided by another agreement between the LLC and the personal data subject.

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

7.14. The retention periods for personal data processed in personal data information systems correspond to the retention periods 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 the processing of their personal data, including information containing:

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

8.1.2. The legal grounds for and purposes of the processing of personal data;

8.1.3. The purposes of the processing and the processing methods used by the LLC;

8.1.4. The name and location of the LLC, and information about persons (other than employees of the LLC) who have access to the personal data or to whom personal data may be transferred or disclosed on the basis of a contract with the LLC or on the basis of federal law;

8.1.5. The list and categories of the personal data processed relating to the relevant personal data subject, and the source of its receipt, unless a different procedure for the provision of such data is provided for by federal law;

8.1.6. The processing periods for the personal data, including its retention periods;

8.1.7. The procedure for the exercise by the personal data subject of the rights provided for by Law 152-FZ;

- 8.1.8. Information about any completed or intended cross-border transfer of personal data;
- 8.1.9. The name, or the surname, first name, patronymic, and the address of the person processing personal data on behalf of the LLC, if the processing has been or will be entrusted to such a person;
- 8.1.10. The existence of an exclusively automated decision-making process applied by the LLC to the processing of personal data;
- 8.1.11. Information on the ways in which the LLC fulfils the obligations established by Article 18.1 of Law 152-FZ;
- 8.1.12. Other information provided for by Law 152-FZ or other federal laws.
- 8.2. The personal data subject's right to receive information concerning the processing of their personal data may be restricted in the cases established by Part 8 of Article 14 of Law 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 where there is an application or request from the personal data subject.
- 8.4. A request sent to the Operator must contain the number of the primary identity document of the personal data subject or their representative, information on the date of issue of that document and the authority that issued it, information confirming the personal data subject's relationship with the Operator (contract number, date of conclusion of the contract, a conventional verbal designation (code word) and/or other information), or information otherwise confirming the fact of the processing of personal data by the Operator, and the signature of the personal data subject or their representative. The request may be sent in the form of an electronic document signed with an electronic signature in accordance with the legislation of the Russian Federation. The Operator provides the information to the personal data subject or their representative in the same form in which the relevant application or request was sent, unless otherwise indicated in the application or request.
- 8.5. The personal data subject may re-apply to the Operator, or send the Operator 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 the sending of the initial request, unless a shorter period is established by federal law, by a regulatory legal act adopted in accordance therewith, or by a contract to which the personal data subject is a party, beneficiary or guarantor.
- 8.6. The personal data subject has the right to demand the rectification of their personal data where inaccuracies are discovered in the personal data processed by the Operator or by a Processor acting on the Operator's instruction, and to have the personal data supplemented, including by submitting an additional statement.
- 8.7. The personal data subject has the right to withdraw their consent to the processing of personal data and to demand the deletion of their personal data from the systems of the Operator or the Processor if the personal data is no longer required for the purposes for which it was collected and the LLC or the Processor has no legal grounds for processing their data.
- 8.8. The personal data subject has the right to demand that the processing of their personal data for the purposes of the LLC's advertising offers be restricted.
- 8.9. The personal data subject has the right to apply to the Operator with a demand to cease the transfer (dissemination, provision, access) of their 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. Applications by the personal data subject or their representative for the purpose of exercising the rights established by Law 152-FZ are made in writing upon presentation of the 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 their representative may submit a complaint to the LLC on matters relating to the processing of personal data using the contact details specified in Section 13 of this Policy or published on the LLC's official website on the Internet at <https://neurosoft.com/en/contacts>.

9. Obligations of the LLC as Operator

9.1. In the cases established by the legislation of the Russian Federation on personal data, the LLC is obliged to provide, free of charge, to the personal data subject or their legal representative (upon application) the information specified in clause 8.1 of this Policy.

9.2. When collecting personal data, including via the Internet information and telecommunications network, the LLC ensures the recording, systematization, accumulation, storage, clarification (updating, modification) and retrieval of the personal data of citizens of the Russian Federation using databases located within 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 the measures necessary and sufficient to ensure the fulfilment of the obligations provided for by Law 152-FZ and the regulatory legal acts adopted in accordance therewith, unless otherwise provided by Law 152-FZ or other federal laws.

9.5. The LLC provides access to this Policy to an unrestricted range of persons, including through the LLC's official online resources.

9.6. The LLC takes the following measures to ensure the fulfilment of the obligations provided for by Law 152-FZ in the field of personal data processing:

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

9.6.2. Internal regulations are issued on matters of personal data processing, defining, for each purpose of personal data processing, the categories and list of the personal data processed, their processing and retention periods, and the procedure for their destruction upon achievement of the processing purposes or upon the occurrence of other legal grounds, as well as internal regulations aimed at preventing and detecting violations of the legislation of the Russian Federation and at remedying the consequences of such violations;

9.6.3. 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 the current threats to the security of personal data during its processing in the LLC's information systems and services;

9.6.4. An assessment is carried out of the harm that may be caused to personal data subjects in the event of a violation of Law 152-FZ, and of the relationship between such harm and the measures taken by the LLC to ensure the fulfilment of the obligations provided for by Law 152-FZ;

9.6.5. Internal control and/or audit is carried out of the compliance of personal data processing with Law 152-FZ and the regulatory legal acts adopted in accordance therewith, with the personal data protection requirements, with the LLC's policy on the processing of personal data, and with the internal regulations in the field of the processing and security of personal data;

9.6.6. The products (items) and processes created by the LLC are analysed for the proper handling of personal data;

9.6.7. Employees directly involved in the processing of personal data are familiarized with the provisions of the legislation of the Russian Federation on personal data, including the personal data protection requirements, with the documents defining the LLC's policy on the processing of personal data and the LLC's internal regulations on matters of personal data processing, and/or such employees receive training.

9.7. Upon application by a personal data subject, the LLC provides the personal data subject or their legal representative with information concerning the processing of their personal data (in response to the relevant application or request) in an accessible form that does not contain the personal data of other persons.

9.8. The LLC considers the application of the personal data subject and provides the personal data subject or their representative with the information specified in clause 8.1 of this Policy within ten working days from the application or from the receipt of the request of the personal data subject or their representative. This period may be extended, but by no more than five working days, provided that the LLC sends the personal data subject a reasoned notification stating the reasons for the extension of the period for providing the requested information. In doing so, the LLC provides the information to the personal data subject or their representative in the same form in which the relevant application or request was sent, unless otherwise indicated in the application or request.

9.9. In the event of a refusal to provide information about the existence of personal data relating to the relevant personal data subject, or to provide the personal data itself, to the personal data subject or their representative upon their application or upon receipt of their request, the LLC is obliged to give a reasoned response in writing, containing a reference to the provision of Part 8 of Article 14 of Law 152-FZ or of another federal law serving as the basis for such refusal, within a period not exceeding ten working days from the day of the application of the personal data subject or their representative, or from the date of receipt of their request. This period may be extended, but by no more than five working days, where the operator sends the personal data subject a reasoned notification stating the reasons for the extension of the period for providing the requested information.

9.10. The LLC is obliged to provide the authorized body for the protection of the rights of personal data subjects, at that body's request, with the necessary information within ten working days from the date of receipt of such request. This period may be extended, but by no more than five working days, where the operator sends the authorized body for the protection of the rights of personal data subjects a reasoned notification stating the reasons for the extension of the period for providing the requested information.

9.11. Where unlawful processing of personal data is discovered upon the application of the personal data subject or their representative, or upon the request of the personal data subject or their representative or of 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 that personal data subject, or to ensure its blocking (if the processing of personal data is carried out by a Processor acting on the Operator's instruction), from the moment of such application or receipt of such request, for the duration of the verification.

9.12. Where inaccurate personal data is discovered upon the application of the personal data subject or their representative, or upon their request or the request of the authorized body for the protection of the rights of personal data subjects, the Operator is obliged to block the personal data relating to that personal data subject, or to ensure its blocking (if the processing of personal data is carried out by a Processor acting on the Operator's instruction), from the moment of such application or receipt of such request, for the duration of the verification, provided that the blocking of the personal data does not violate the rights and legitimate interests of the personal data subject or of third parties.

9.13. Where the fact of the inaccuracy of personal data is confirmed, the Operator, on the basis of the information provided by the personal data subject or their representative or by the authorized body for the protection of the rights of personal data subjects, or of other necessary documents, is obliged to rectify the personal data or to ensure its rectification (if the processing of personal data is carried out by a Processor acting on the Operator's instruction) within seven working days from the day such information is provided, and to lift the blocking of the personal data.

9.14. Where the fact of an unlawful or accidental transfer (provision, dissemination, access) of personal data resulting in a violation of the rights of personal data subjects is established, the Operator is obliged, from the moment such incident is identified by the Operator, by the authorized body for the protection of the rights of personal data subjects, or by another interested party, to notify the authorized body of the Russian Federation for the protection of the rights of personal data subjects (Roskomnadzor):

9.14.1. Within twenty-four hours – of the incident that has occurred, of the presumed causes that led to the violation of the rights of personal data subjects and the presumed harm caused to the rights of personal data subjects, and of the measures taken to remedy the consequences of the relevant incident, and to provide details of the person authorized by the operator to interact with the authorized body for the protection of the rights of personal data subjects on matters relating to the identified incident;

9.14.2. Within seventy-two hours – of the results of the internal investigation into the identified incident, and to provide details of the persons whose actions caused the identified incident (if any).

9.15. Where the purpose of the processing of personal data is achieved, the Operator is obliged to cease the processing of the personal data or to ensure its cessation (if the processing of personal data is carried out by a Processor acting on the Operator's instruction) and to destroy the personal data or to ensure its destruction (if the processing of personal data is carried out by a Processor acting on the Operator's instruction) within a period not exceeding thirty days from the date the purpose of the processing of personal data was achieved, unless otherwise provided by a contract to which the personal data subject is a party, beneficiary or guarantor, or by another agreement between the Operator and the personal data subject, or unless the Operator is not entitled to process the personal data without the consent of the personal data subject on the grounds provided for by Law 152-FZ or other federal laws.

9.16. Where the personal data subject withdraws consent to the processing of their personal data, the Operator is obliged to cease their processing or to ensure the cessation of such processing (if the processing of personal data is carried out by a Processor acting on the Operator's instruction) and, where the retention of the personal data is no longer required for the purposes of the processing of personal data, to destroy the personal data or to ensure its destruction (if the processing of personal data is carried out by a Processor acting on the Operator's instruction) within a period not exceeding thirty days from the date of receipt of the said withdrawal, unless otherwise provided by a contract to which the personal data subject is a party, beneficiary or guarantor, or by another agreement between the Operator and the personal data subject, or unless the Operator is not entitled to process the personal data without the consent of the personal data subject on the grounds provided for by Law 152-FZ or other federal laws.

9.17. Where the personal data subject applies to the Operator with a demand to cease 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 relevant demand, to cease their processing or to ensure the cessation of such processing (where such processing is carried out by a person processing personal data), except in the cases provided for by items 2–11 of Part 1 of Article 6, Part 2 of Article 10 and Part 2 of Article 11 of the said Federal Law. This period may be extended, but by no more than five working days, where the operator sends the personal data subject a reasoned notification stating the reasons for the extension of the period for providing the requested information.

9.18. Where it is impossible to destroy the personal data within the periods specified in clauses

9.8–9.11 of this Policy, the LLC blocks such personal data or ensures its blocking (if the processing of personal data is carried out by another person acting on the Operator's instruction) and ensures the destruction of the personal data within a period of no more than six months, unless a different period is established by federal laws.

9.19. The destruction of personal data recorded on paper media may be carried out by the Opera-

tor by any available means (blacking out, incineration, the use of paper-cutting equipment (shredders)); the destruction of personal data recorded in electronic form on any physical media and/or in personal data information systems may be carried out by means of physical impact on the physical media (breaking, crushing, etc.), by using information protection tools that have passed the conformity assessment procedure in the established manner and that incorporate an information destruction function, or by using the built-in functionality of the information systems themselves.

9.20. Where, in accordance with federal law, the provision of personal data and/or the obtaining by the Operator of consent to the processing of personal data is mandatory, the Operator is obliged to explain to the personal data subject the legal consequences of a refusal to provide their personal data and/or to give consent to its processing.

10. Measures Aimed at Protecting Personal Data

10.1. The LLC's personal data protection system comprises a set of legal, organizational and technical measures aimed at neutralizing the current threats to the security of personal data during its processing in personal data information systems, taking into account the specific characteristics of the information infrastructure, the architecture of the personal data information systems and the information technologies used, in accordance with the personal data protection requirements for each of the protection levels established by the federal executive authority responsible for security (the FSB of Russia) and the federal executive authority responsible for countering technical intelligence and for the technical protection of information (FSTEC of Russia), within the limits of their respective powers.

10.2. The selection and implementation of personal data protection tools and systems for the processing of personal data in personal data information systems may be carried out by the LLC itself or with the involvement of third-party organizations holding a licence for the technical protection of confidential information not containing information constituting a state secret.

10.3. The protection of personal data during its processing in personal data information systems against unlawful or accidental access to it, destruction, modification, blocking, copying, provision and dissemination, as well as against other unlawful actions in relation to personal data, is ensured by the application of an interconnected set of protective measures and tools, in particular:

10.3.1. Threats to the security of personal data during its processing in personal data information systems are identified and kept up to date;

10.3.2. Organizational and technical measures are applied to ensure the security of personal data during its processing in personal data information systems, aimed at neutralizing the current threats to the security of personal data in accordance with the legislation of the Russian Federation;

10.3.3. Information protection tools that have passed the conformity assessment procedure in the established manner and that are intended to neutralize current security threats are used;

10.3.4. The effectiveness of the measures taken to ensure the security of personal data is assessed before the personal data information system is put into operation;

10.3.5. Machine-readable personal data media are recorded and tracked;

10.3.6. Measures are taken to detect facts of unauthorized access to personal data and to take appropriate action, including measures to detect, prevent and remedy the consequences of computer attacks on personal data information systems and to respond to computer incidents in them;

10.3.7. The possibility of restoring personal data modified or destroyed as a result of unauthorized access to it is ensured;

10.3.8. Rules are established for access to the personal data processed in the personal data information system, and the registration and recording of the actions performed with personal data in

the personal data information system is ensured;

10.3.9. Control is exercised over the measures taken to ensure the security of personal data.

10.4. In the event of information security incidents related to the processing of personal data that have resulted in the unlawful transfer (provision, dissemination, access) of personal data, the LLC must, in the manner determined by the FSB of Russia, ensure interaction with the State System for the Detection, Prevention and Elimination of the Consequences of Computer Attacks on the Information Resources of the Russian Federation, including informing it of computer incidents, in order to minimize the consequences of incidents for personal data subjects and to prevent them in the future.

11. Liability

11.1. Persons guilty of violating the norms and rules governing the processing of personal data, its protection and the maintenance of its confidentiality bear full liability as provided for by the applicable legislation of the Russian Federation.

12. Final Provisions

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

12.2. This Policy enters into force upon its approval and remains in effect indefinitely. Where amendments to the current Policy are required, the Policy is approved in a new version.

13. Company Details and Contact Information

Name: Neurosoft, Limited Liability Company (Neurosoft LLC) INN (Taxpayer Identification Number): 3729002450

KPP (Tax Registration Reason Code): 370201001

OGRN (Principal State Registration Number): 1033700080721

Registered address: 5 Voronina St., Ivanovo, Ivanovo Region, 153032, Russian Federation

E-mail: info@neurosoft.com