Policy for processing personal data on the website

1. What does this document regulate?

1.1. This Policy (the "Policy") has been drawn up in accordance with Federal Law No. 152-FZ "On personal data" dated 27 July 2006. It determines the policy of the personal data operator, LLC PROEKTNYE RESHENIYA, with regard to the processing of personal data collected using the website <u>www.prlf.ru</u> (the "Website"). The Policy contains information concerning PROEKTNYE RESHENIYA's requirements for the protection of such personal data.

1.2. The legal grounds for the processing of personal data are as follows: legal acts of the Russian Federation, internal regulations of personal data operator, agreements with personal data subjects, and consents of personal data subjects to the processing of their personal data.

1.3. The definitions contained in article 3 of Federal Law No. 152-FZ "On personal data" dated 27 July 2006 are used in this Policy with the same meanings.

2. Rights and obligations of the Personal Data Operator and personal data subjects

2.1. Personal Data Operator, in its capacity as a personal data operator, has the right to:

- obtain from a personal data subject accurate information concerning the personal data they have provided;
- request a personal data subject to clarify in a timely manner personal data that has been provided; and
- post on the Website and other information resources the photographs of the participants of the events in order to inform the Website's visitors about an event that has been held.
- 2.2. Personal Data Operator, in its capacity as a personal data operator, shall:
 - process personal data under the procedure established by current Russian legislation;
 - consider communications from a personal data subject (or their lawful representative) in relation to issues concerning the processing of personal data and provide grounded answers within ten business days from the date when the relevant query was received;
 - grant to a personal data subject (or their lawful representative) the possibility of free access to their personal data;
 - take measures to clarify and destroy the personal data of a personal data subject in connection with this subject (or their lawful representative) raising lawful and

grounded claims, as well as when the purposes of the processing of personal data have been achieved; and

- arrange for the protection of personal data in compliance with Russian legislation.
- 2.3. Personal data subjects may:
 - obtain information concerning their personal data processed by Personal Data Operator, by sending a written request to the mailing or electronic address stated on the Website in the Contacts section;
 - receive access to their personal data except for cases provided for by law;
 - clarify their personal data, demand that it be blocked or destroyed where the personal data is incomplete, obsolete, inaccurate, has been illegally obtained or is not necessary for the stated purpose, by sending a written request to the mailing or electronic address stated on the Website in the Contacts section;
 - withdraw consents to the processing of their personal data, by sending a written request to the mailing or electronic address stated on the Website in the Contacts section; and
 - exercise other rights for which Russian legislation provides.

2.4. Personal data subjects shall:

- provide Personal Data Operator only with accurate data and information; and
- inform Personal Data Operator about any clarification (updates, or changes) of their personal data.
- 3. Whose data is processed and what are the types of such data?

3.1. Personal Data Operator processes personal data of the following categories of data subjects whose personal data can be collected by Personal Data Operator using the Website:

- unregistered users;
- registered users;
- participants of events (who are not registered users).

3.2. Personal Data Operator s processing of the personal data of other categories of personal data subjects shall be governed by other internal regulations of Personal Data Operator. The processed personal data of unregistered and registered users of the Website as well as of participants of events includes all information the users provide to

Personal Data Operator using the Website including by filling out the relevant data fields of personal data subjects on the Website, including:

- surname, name and patronymic;
- sex;
- country, city;
- mobile phone number;
- e-mail address;
- name of the company where the User works (if applicable);
- job position;
- postal address;
- legal address;
- the search and watch history on the Website and its services (for visitors of the Website);
- pictures and videos from events held by Personal Data Operator ;
- professional interests; and
- other information (this list may be reduced or extended depending on the specific case and the purposes of processing).

4. For what purposes is personal data processed?

4.1. Personal Data Operator will process the personal data of unregistered users to enable them to communicate with Personal Data Operator. The following personal data will be processed:

- surname, name and patronymic;
- sex;
- country, city;
- mobile phone number;
- e-mail address;
- name of the company where the User works (if applicable);
- job position;

- postal address;
- legal address;
- the search and watch history on the Website and its services (for visitors of the Website);
- pictures and videos from events held by Personal Data Operator;
- professional interests; and
- other information (this list may be reduced or extended depending on the specific case and the purposes of processing).

4.2. Personal Data Operator will process the personal data of registered users for the following purposes:

1) to enable them to use the Website, which involves:

- communicating with Personal Data Operator,
- providing users with reference information,
- advising users on the work we perform and services we supply as well as providing support to users,
- making the Website more user-friendly;
- 2) to promote Personal Data Operator 's work and services by contacting users directly;

3) to participate in events, which involves:

- providing users with information on upcoming events,
- registering for an event;
- providing users with materials for events that will be held as well as following events that have been held.

To achieve the above purposes, Personal Data Operator processes the following personal data of registered users:

- surname, name and patronymic;
- sex;
- country, city;

- mobile phone number;
- e-mail address;
- name of the company where the User works (if applicable);
- job position;
- postal address;
- legal address;
- the search and watch history on the Website and its services (for visitors of the Website);
- pictures and videos from events held by Personal Data Operator ;
- professional interests; and
- other information (this list may be reduced or extended depending on the specific case and the purposes of processing).

4.3. Personal Data Operator will process the personal data of participants of events to enable them to take part in such events, as well as to inform them about any past events, which involves:

- providing the participants of events with information on the upcoming events,
- registering for an event;
- providing participants of events with materials for events to be held as well as following events that have been held.

To achieve the above purposes, Personal Data Operator processes the following personal data of participants of events:

- surname, name and patronymic;
- sex;
- country, city;
- mobile phone number;
- e-mail address;
- name of the company where the User works (if applicable);
- job position;

- postal address;
- legal address;
- the search and watch history on the Website and its services (for visitors of the Website);
- pictures and videos from events held by Personal Data Operator;
- professional interests; and
- other information (this list may be reduced or extended depending on the specific case and the purposes of processing).

5. How is personal data processed?

5.1. Personal Data Operator may process personal data by using automated tools or without using such tools by collecting, recording, systematising, accumulating, storing, adjusting (updating or changing), extracting, using, transferring (making available or distributing), blocking, deleting and destroying the personal data.

5.2. Personal Data Operator may transfer personal data to third parties or instruct third parties to process personal data if this is required for the purpose of the processing of such data in accordance with this Policy as well as in the cases for which current Russian legislation on personal data provides.

5.3. Personal Data Operator will process personal data for no longer than is required for the purposes of such processing unless current Russian legislation on personal data provides for other timeframes.

6. How is personal data protected?

6.1. Personal Data Operator takes responsibility for protecting the personal data collected and meets the requirements for protecting it by taking a set of measures that are necessary and sufficient for ensuring the performance of the obligations set out in current Russian legislation on personal data.

6.2. However, Personal Data Operator is not responsible for third parties obtaining the personal data by obtaining access to registered users' personal accounts. The registered users of the Website must independently ensure the security of the data for accessing their personal accounts.

7. Consent to the processing of personal data and applicable clauses

7.1. A user of the Website, of his/her own free will and volition and on his/her own behalf, provides Personal Data Operator with his/her personal data and, on behalf of the participants of events, the personal data of such participants.

7.2. By accepting the terms of this Policy, the user of the Website hereby confirms that the personal data he/she has provided is accurate. Personal Data Operator proceeds on the basis that a user of the Website provides accurate personal data and maintains it in an accurate form.

7.3. By filling out the data fields on the Website the user of the Website accepts this Policy and grants his/her consent to the processing of his/her personal data in accordance with the procedure and on the conditions set out in this Policy.

7.4. By filling out the data fields with respect to the participants of events, the user of the Website warrants that the participants of events have granted their consent to the processing of their personal data in accordance with the procedure and on the conditions set out in this Policy. In such a case, the user of the Website also undertakes to notify such participants of events of the transfer of their personal data to Personal Data Operator and warrants that notice will be given to this effect.

7.5. By accepting the terms of this Policy the user of the Website confirms that he/she is aware of his/her rights and obligations set out in current Russian legislation on personal data, including the right to access his/her personal data and to revoke his/her consent.

7.6. A condition for the processing of personal data to be ceased is that the purposes of processing personal data have been achieved, that the period of the consent has expired or that the consent of the personal data subject to their personal data being processed has been withdrawn, as well as that unlawful processing of personal data has been identified. A personal data subject may withdraw their consent to the processing of their personal data, by sending a written notice to the electronic address stated on the Website in the Contacts section.

7.7. If the user of the Website does not intend to provide the personal data or does not accept this Policy, he/she must stop using the Website. In this case, Personal Data Operator will not be able to ensure that the user can use the Website.

8. What other personal data can be processed?

8.1. Personal Data Operator may collect information on users visiting the Website without the users providing the relevant information. Such information may be obtained by using various methods, means and online statistics and set-up tools (in particular, cookie files and service like Yandex.Metrics). Personal Data Operator may use such methods, means and tools to promote the work and services of Personal Data Operator, to provide information about upcoming events by using targeted advertising as well as to make the Website more user friendly by creating profiles of registered users. Such methods, means and tools are not used for identifying unregistered users.

8.2.If a user of the Website does not agree to cookie files being stored on his/her device, he/she can independently disable this option in the browser configurations. Stored cookie files can be deleted at any time in the browser system configurations. A user of the Website can change the browser configurations to be able to accept or reject by default all cookie files or cookie files from specific websites, including the Website. 8.3. Disabling specific cookie files may prevent the use of specific sections or functions of the Website.

8.4. If a user of the Website does not agree with Internet statistics and set-up methods, means and tools being used, he/ she should stop using the Website. In this case, Personal Data Operator will not be able to ensure that the user can use the Website.

9. Destroying personal data

9.1. When the purposes of processing personal data have achieved, the period of the consent for the processing of personal data has expired or the consent of the personal data subject to processing has been withdrawn, the personal data must be destroyed unless:

- an agreement to which the personal data subject is a party, a beneficiary or a guarantor provides otherwise;
- any other agreement between the operator and personal data subject provides otherwise.

9.2. If Personal Data Operator processes personal data without any automation tools, a certificate of the destruction of personal data will be the document supporting the destruction of data of personal data subjects.

9.3. If Personal Data Operator processes personal data using automation tools, a certificate of the destruction of personal data and a roll-out from the event log in the information system of personal data will be the documents supporting the destruction of data of personal data subjects.

9.4. If Personal Data Operator processes personal data both using automation tools as well as without any automation tools, a certificate of the destruction of personal data and a roll-out from the event log in the information system of personal data will be the documents supporting the destruction of data of personal data subjects.

9.5. The certificate of the destruction of personal data and the roll-out from the event log must be kept for three years after the personal data has been destroyed.

10. Final provisions

10.1. This Policy is to be amended or supplemented if the corresponding changes or additions are made to current Russian legislation on personal data. The Policy may also be amended at any time at the discretion of Personal Data Operator . The current version of Personal Data Operator 's Policy is always available for review by the public at large at its permanent address on the Website: <u>www.prlf.ru</u>.

10.2. All relationships involving Personal Data Operator relating to the processing and protection of personal data which are not expressly reflected in this Policy will be regulated in accordance with Russian legislation on personal data.