

DATA PROCESSING AND PROTECTION POLICY of Repinsky Resort, Limited Liability Company

1. GENERAL PROVISIONS

1.1. In order to comply with the legislation of the Russian Federation that governs relations related to the processing and security of personal data, as well as to maintain its business reputation, Repinsky Resort, Limited Liability Company (hereinafter referred to as the Company) shall set its objectives as compliance with the principles of legality, fairness and confidentiality in the processing of personal data, as well as ensuring the security of the processing processes.

1.2. This Data Processing and Protection Policy of Repinsky Resort, Limited Liability Company (hereinafter referred to as the Policy) will:

1.2.1. Disclose the main categories of personal data processed by the Company, the purposes, methods and principles of processing personal data, the rights and obligations of the Company when processing personal data, and the rights of data subjects.

1.2.2. Be a publicly available document declaring the conceptual foundations of the Company's activities in the processing of personal data.

1.3. The Company's most important purpose of, and condition for, its activities are to observe human and civil rights and freedoms when processing personal data, including the protection of rights to privacy.

1.4. The Company shall process personal data in compliance with the principles and conditions stipulated by this Policy and the legislation of the Russian Federation in the field of personal data.

2. TERMS AND DEFINITIONS USED IN THE POLICY

2.1. **Automated processing of personal data** means processing of personal data by means of computer technology.

2.2. **Blocking of personal data** means temporary termination of personal data processing (except when processing is necessary to clarify personal data).

2.3. **Access to information (access)** means reading and processing of information, in particular, copying, modification or destruction.

2.4. **Information system of personal data (hereinafter referred to as the ISPD)** means a set of personal data contained in databases of personal data, and providing information technology and technical means for its processing.

2.5. **Confidentiality of personal data** means the obligation not to disclose to any third party or distribute personal data without the consent from the Data Subject, unless otherwise provided by federal law.

2.6. **Unauthorized access (UA)** means access to information stored on various types of media (e.g., paper, magnetic, optical, etc.) in computer databases, file storage, archives, classified sections, etc. of various organizations by changing (increasing, falsifying) access rights.

2.7. **Information media** means any material object or medium used to store or transmit

information.

2.8. **Depersonalization of personal data** means actions that make it impossible to determine, without the use of additional information, whether the personal data belongs to a particular data subject.

2.9. **Personal data processing** means any action (operation) or a set of actions (operations) carried out with personal data with or without the automation tools, including collection, recording, systematization, accumulation, storage, clarification (update, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.10. **Operator** means a state body, municipal authority, legal entity or individual, independently or together with other persons organizing and (or) carrying out the processing of personal data, as well as defining the purpose of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data. **Repinsky Resort, LLC shall be the Operator.**

2.11. **Personal Data** shall mean any information relating directly or indirectly to a specific or identifiable individual (data subject).

2.12. **Personal data permitted for distribution by the Data Subject** means personal data access to which by an unlimited number of persons is granted by the Data Subject by giving consent to the processing of personal data permitted by the Data Subject for distribution in the manner prescribed by the Law on Personal Data (hereinafter referred to as personal data permitted for distribution).

2.13. **Provision of personal data** means actions aimed at the disclosure of personal data to a certain person or a certain circle of people.

2.14. **Distribution of personal data** means any action aimed at the disclosure of personal data to an indefinite range of persons (transfer of personal data) or to familiarize with personal data to an unlimited number of persons, including the publication of personal data in the media, placing in information and telecommunications networks or provide access to personal data in any other way.

2.15. **Special categories of personal data** mean categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, health status, and intimate life.

2.16. **Data Subject** means an individual to whom the Personal Data belongs and who can be identified through such Personal Data.

2.17. **Cross-border transfer of personal data** means the transfer of personal data to a foreign country to a foreign authority, a foreign individual or a foreign legal entity.

2.18. **Destruction of personal data** means any action resulting in the destruction of personal data irretrievably with the inability to further restore the content of personal data in the information system of personal data and (or) the destruction of the material media for personal data.

3. RIGHTS OF DATA SUBJECTS AND MAIN RESPONSIBILITIES OF THE OPERATOR

3.1. **The Data Subject may** receive information about the processing of the personal data in the Company:

3.1.1. The Data Subject may demand that the Company confirms that it process and update their personal data, with the information about the source of their receipt, block or destroy the same if they are incomplete, outdated, inaccurate, illegally obtained or cannot be recognized as necessary for the stated purpose of processing, and also to take action as provided by law to protect their rights;

3.1.2. The Data Subject may request from the Company information on the legal grounds for processing their personal data, the purposes applied by the Operator, the methods and terms of processing

their personal data, including the storage periods;

3.1.3. The Data Subject may request from the Company information about persons to whom their personal data may be disclosed under an agreement with the Operator or in accordance with the legislation of the Russian Federation, as well as about persons who have access to their personal data or to whom their personal data may be disclosed under an agreement with the Company or a federal law;

3.1.4. The Data Subject may be aware of the name or last name, first name, patronymic and address of the person engaged in the processing on behalf of the Operator, if the processing is or will be entrusted to a third person;

3.1.5. The right of the Data Subject to access their personal data may be limited in accordance with federal laws;

3.1.6. In order to exercise their rights and protect their legitimate interests, the Data Subject may contact the Company. The Operator shall review any requests and complaints from data subjects, thoroughly investigate violations and take all necessary action to rectify the same immediately, punish the guilty parties and resolve disputes and conflict situations out of court;

3.1.7. The Data Subject shall be entitled to appeal any action or omission of the Company by contacting the authorized body for the protection of the rights of data subjects (i.e., a territorial body of the Federal Service for Supervision of Communications, Information Technology and Mass Media);

3.1.8. The Data Subject shall be entitled to protect their rights and legitimate interests, including to seek compensation for losses and/or moral damages in court.

3.2. Main Responsibilities of REPINSKY RESORT, LLC:

3.2.1. Organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;

3.2.2. Comply with the legislation of the Russian Federation in the field of processing and protection of personal data;

3.2.3. When collecting personal data, provide the Data Subject, at their request, with information regarding the processing of their personal data;

3.2.4. If the provision of personal data is required by a federal law, the Company's employees shall explain to the Data Subject the legal consequences of refusing to provide their personal data;

3.2.5. When collecting personal data, including through the Internet, ensure the recording, systematization, accumulation, storage, clarification (updating, modification), extraction of personal data of citizens of the Russian Federation using databases located in the Russian Federation;

3.2.6. Publish or otherwise provide unrestricted access to the effective document defining its policy regarding the processing of personal data, to information on the applicable requirements for the protection of personal data (i.e., this Policy);

3.2.7. Take or ensure that necessary legal, organizational and technical actions are taken to protect personal data against unauthorized or accidental access;

3.2.8. Inform the Data Subject or their representative of the availability of personal data related to the relevant Data Subject and also provide the opportunity to become familiar with such personal data upon request from the Data Subject or their representative;

3.2.9. Update, block or destroy personal data of Data Subjects, if they are incomplete, outdated, inaccurate, illegally obtained or cannot be recognized as necessary for the stated purpose of the processing;

3.2.10. Ensure that the processing of personal data is lawful. If it is impossible to ensure the

legality of the processing of personal data, the Operator, within a period not exceeding ten (10) business days from the date of detection that the processing of personal data is illegal, shall destroy or ensure the destruction of the Personal Data;

3.2.11. Terminate the processing of personal data in the event that the Data Subject revokes the consent to the processing of their personal data. The Company shall be entitled to continue processing personal data without the consent of the Data Subject, provided that there are grounds specified in Paragraphs 2–11 of Part 1 of Article 6, Part 2 of Article 10 and Part 2 of Article 11 of Federal Law No. 152-FZ On Personal Data, dated 27.07.2006.

4. PURPOSES OF COLLECTING PERSONAL DATA

4.1. The Company shall process personal data of the following categories of personal data subjects (hereinafter referred to as Data Subjects):

- 4.1.1. Employees;
- 4.1.2. Relatives of employees;
- 4.1.3. Fired employees;
- 4.1.4. Applicants;
- 4.1.5. Counterparties;
- 4.1.6. Representatives of counterparties;
- 4.1.7. Customers;
- 4.1.8. Beneficiaries under contracts;
- 4.1.9. Visitors to the Website.
- 4.1.10. Visitors to REPINSKY RESORT, LLC

4.2. The Company shall process personal data of employees exclusively for the following purposes:

4.2.1. Comply with the labor, tax and pension legislation of the Russian Federation and to maintain personnel and accounting records;

4.2.2. Ensure access control and delimitation of employee access to certain facilities on the site of the Company;

4.2.3. Comply with the legislation of the Russian Federation establishing the obligation for employees of certain professions, industries and organizations to undergo medical examinations.

4.3. The Company shall process personal data of employees' relatives solely for the purpose of complying with the labor legislation of the Russian Federation and maintaining personnel and accounting records.

4.4. The Company shall process personal data of fired employees solely for the purpose of complying with the labor and pension legislation of the Russian Federation and maintaining personnel records.

4.5. The Company shall process personal data of applicants solely for the purpose of making a decision on the employment with the Company and of maintaining personnel records.

4.6. The Company shall process personal data of counterparties, their representatives, customers and beneficiaries under contracts solely for the purposes of concluding and fulfilling obligations under contracts with the counterparties, promoting the Company's services, organizing and ensuring access control at Repinsky Resort, LLC and ensuring proper accounting at the Company.

4.7. Repinsky Resort, LLC shall process personal data of the Website's visitors solely for the purpose of promoting the Company's services and providing information and reference support, including

for establishing feedback with potential customers.

4.8. Repinsky Resort, LLC shall process personal data of visitors to the Company's site solely for the purpose of organizing and implementing access control to the Operator's site.

5. LEGAL GROUNDS FOR PERSONAL DATA PROCESSING

5.1. The legal grounds for the processing of personal data is the set of legal acts pursuant to and in accordance with which the Company processes personal data.

5.2. Personal data shall be processed by the Company in accordance with the following legal grounds:

5.2.1. the Constitution of the Russian Federation;

5.2.2. the Labor Code of the Russian Federation;

5.2.3. the Civil Code of the Russian Federation;

5.2.4. the Criminal Code of the Russian Federation;

5.2.5. the Code of Administrative Offenses of the Russian Federation;

5.2.6. the Tax Code of the Russian Federation;

5.2.7. Federal Law No. 160-FZ On Ratification of the Council of Europe Convention for the Protection of Individuals with Regard to Automatic Processing of Personal Data, dated 19.12.2005;

5.2.8. Federal Law No. 149-FZ On Information, Information Technology and Information Security, dated 27.07.2006;

5.2.9. Decree of the Government of the Russian Federation No. 1119 On Approval of Requirements to the Protection of Personal Data during their Processing in Personal Data Information Systems, dated 01.11.2012;

5.2.10. Decree of the Government of the Russian Federation No. 687 On approval of the Regulation on the Processing of Personal Data without the Use of Automation Tools, dated 15.09.2008;

5.2.11. Resolution of the Board of the Russian Pension Fund No. 192p On the Personalized Accounting Forms in Compulsory Pension Insurance and Filling-Out Guidelines, dated 31.07.2006;

5.2.12. Federal Law No. 402-FZ On Accounting, dated 06.12.2011;

5.2.13. Law of the Russian Federation No. 1032-1 On Employment of the Population in the Russian Federation, dated 19.04.1991;

5.2.14. Resolution of the Russian Government No. 1853 On Approval of the Rules for Provision of Hotel Services in the Russian Federation, dated 18.11.2020;

5.2.15. Resolution of the Russian Government No. 713 On Approval of the Rules for Registration and Deregistration of Citizens of the Russian Federation at the Place of Stay and at the Place of Residence within the Russian Federation and the List of Persons Responsible for the Acceptance and Filing with the Registration Authorities of Documents for Registration and Deregistration of Citizens of the Russian Federation at the Place of Stay and at the Place of Residence within the Russian Federation, dated 17.07.1995;

5.2.16. Articles of Association of Repinsky Resort, LLC;

5.2.17. Employment contracts of Repinsky Resort, LLC with employees of the Company;

5.2.18. Agreements between Repinsky Resort, LLC and Data Subjects;

5.2.19. Agreements between REPINSKY RESORT, LLC and persons / entities providing services for medical examinations of the Company's employees;

5.2.20. Consents to the personal data processing from Data Subjects.

6. AMOUNTS AND CATEGORIES OF PROCESSED PERSONAL DATA, CATEGORIES OF DATA SUBJECTS

6.1. The content and amount of processed personal data of Data Subjects meets the purposes of the processing.

6.2. In processing personal data of employees, the following categories of personal data shall be processed:

- 6.2.1. Name, patronymic, surname;
- 6.2.2. Year of birth;
- 6.2.3. Month of birth;
- 6.2.4. Date of birth;
- 6.2.5. Place of birth;
- 6.2.6. Marital status;
- 6.2.7. Social status (i.e., information about social benefits to which the employee is entitled in accordance with the law i.e., benefit, document number and date of issue, reasons));
- 6.2.8. Income (including wage rate / salary and allowances);
- 6.2.9. Sex;
- 6.2.10. Email address;
- 6.2.11. Actual residential address;
- 6.2.12. Registration address;
- 6.2.13. Phone number;
- 6.2.14. TIN;
- 6.2.15. Personal insurance policy number (SNILS);
- 6.2.16. Identity document details (i.e., type, series, number, date of issue, and issuing authority);
- 6.2.17. Citizenship;
- 6.2.18. Bank card details;
- 6.2.19. Settlement account number;
- 6.2.20. Current account number;
- 6.2.21. Profession (including code according to the classifier of professions, positions and wage grades, or OKPDTR);
- 6.2.22. Position (including specialty, profession, rank, class, previously held position);
- 6.2.23. Information about employment history (including length of service, current employment data, indicating company name and bank account);
- 6.2.24. Information related to military duty and military registration;
- 6.2.25. Information on education;
- 6.2.26. Information about health status;
- 6.2.27. Document data contained in the birth certificate;
- 6.2.28. Information about the employee's work experience at the previous place of work (i.e., name of employer, position and period);
- 6.2.29. Personal signature of the employee.

6.3. In processing personal data of employees, the following categories of personal data belonging to employees' family members shall be processed:

- 6.3.1. Name, patronymic, surname;
- 6.3.2. Degree of kinship;

6.3.3. Year of birth.

6.4. In processing personal data of fired employees, the following categories of personal data shall be processed:

6.4.1. Name, patronymic, surname;

6.4.2. TIN;

6.4.3. Personal insurance policy number (SNILS);

6.4.4. Sex;

6.4.5. Number and date of employment contract;

6.4.6. Date of birth;

6.4.7. Place of birth;

6.4.8. Citizenship;

6.4.9. Identity document details (i.e., type, series, number, date of issue, and issuing authority);

6.4.10. Registered address and date of registration;

6.4.11. Information about employment history (including length of service, date of employment, nature of work).

6.5. In processing personal data of candidates for vacant positions (applicants), the following categories of personal data shall be processed:

6.5.1. Name, patronymic, surname;

6.5.2. Month of birth;

6.5.3. Year of birth;

6.5.4. Place of birth;

6.5.5. Marital status;

6.5.6. Social status;

6.5.7. Income;

6.5.8. Residential address;

6.5.9. Personal ID details;

6.5.10. Registration address;

6.5.11. Personal insurance policy number (SNILS);

6.5.12. TIN;

6.5.13. Citizenship;

6.5.14. Settlement account number;

6.5.15. Current account number;

6.5.16. Information on military duty and military registration;

6.5.17. Information about employment history (including length of service, current employment data, indicating company name and bank account);

6.5.18. Sex;

6.5.19. Date of birth;

6.5.20. Information on education;

6.5.21. Profession;

6.5.22. Position;

6.5.23. Phone number;

6.5.24. Email address;

6.5.25. Information about health status.

6.6. In processing personal data of counterparties, counterparty representatives, customers and

beneficiaries under contracts, the following categories of personal data shall be processed:

- 6.6.1. Name, patronymic, surname;
- 6.6.2. Date of birth;
- 6.6.3. Year of birth;
- 6.6.4. Month of birth;
- 6.6.5. Place of birth;
- 6.6.6. Residential address;
- 6.6.7. Identity document details (i.e., type, series, number, date of issue, and issuing authority);
- 6.6.8. Position;
- 6.6.9. Phone number;
- 6.6.10. Email address;
- 6.6.11. Citizenship;
- 6.6.12. Registration address;
- 6.6.13. Personal signature of the counterparty or representative of the counterparty;
- 6.6.14. Settlement account number;
- 6.6.15. Current account number;
- 6.6.16. Sex;
- 6.6.17. Details of the identity document applicable outside the Russian Federation;
- 6.6.18. Personal insurance policy number (SNILS);
- 6.6.19. TIN;
- 6.6.20. Copy of the identity document (i.e., type, series, number, date of issue, and issuing authority);
- 6.6.21. Copy of the identity document applicable outside the Russian Federation;
- 6.6.22. Bank card details;
- 6.6.23. Power of attorney;
- 6.6.24. Primary state registration number of individual entrepreneur (OGRNIP);
- 6.6.25. Copy of a document confirming the legality of stay in the Russian Federation.

6.7. In processing personal data of visitors to the Website of REPINSKY RESORT, LLC, the minimum required categories of personal data shall be processed:

- 6.7.1. Name, patronymic, surname;
- 6.7.2. Email address;
- 6.7.3. Phone number;
- 6.7.4. Data collected by the operator's website automatically using metrics software.

6.8. In processing personal data of visitors to the site of REPINSKY RESORT, LLC, the minimum required categories of personal data shall be processed:

- 6.8.1. Name, patronymic, surname;
- 6.8.2. Date of birth;
- 6.8.3. Phone number;
- 6.8.4. State registration number of the visitor's vehicle.

6.9. The Company shall not process personal biometric data (i.e., information that characterizes the physiological and biological features of a person, on the basis of which it is possible to establish their identity and which is used to establish the identity of the Data Subject;

6.10. The Company shall process information about the health status of employees and job applicants solely for the purpose of complying with the legislation of the Russian Federation regarding

mandatory preliminary and periodic medical examinations for all employees at organizations providing public utilities and household services. Repinsky Resort, LLC shall not process any other special categories of personal data related to race, ethnicity, political views, religious or philosophical beliefs, or intimate life.

6.11. The Company shall not engage in cross-border transfer of personal data (i.e., to a foreign country to a foreign authority, a foreign individual or a foreign legal entity).

7. PROCEDURE AND CONDITIONS FOR PROCESSING PERSONAL DATA

7.1. The Company shall process personal data of Data Subjects for the purposes as specified in Section 4 hereof.

7.2. The Company shall process the categories of personal data as specified in Section 6 hereof.

7.3. Personal data of the Company's employees shall not be processed unless upon receipt of the consent of the said persons. The consent of the Data Subject shall be given in writing, unless otherwise provided for by the Federal Law on Personal Data.

7.4. The processing of personal data belonging to Data Subjects shall include the following actions: collection, recording, systematization, accumulation, storage, clarification (updating or modification), extraction, use, transfer (distribution, provision and access), depersonalization, blocking, deletion, and destruction.

7.5. Collection, recording, systematization, accumulation and clarification (updating or modification) of personal data shall be carried out by obtaining personal data directly from the Data Subjects (their legal representatives).

7.6. The Company and the Company's employees who have gained access to personal data shall refrain from disclosing to any third party or distributing personal data without the consent from the Data Subject, unless otherwise provided by federal law.

7.7. The Company may transfer personal data to the bodies of inquiry and investigation, or and other competent authorities on the grounds provided for by the current legislation of the Russian Federation.

7.8. If the provision of personal data is required by a federal law, the Company's employee who collects (receives) personal data directly from a Data Subject shall explain to the Data Subject the legal consequences of refusing to provide their personal data.

7.9. In its activities, the Company shall comply with the rules for personal data processing as specified in Article 5 of Federal Law 152-FZ On Personal Data.

7.10. In its activities, the Company shall take actions as provided for in Part 2 of Article 18.1, Part 1 of Article 19 of Federal Law 152-FZ On Personal Data.

7.11. The Company shall not use databases located outside the Russian Federation to process personal data.

7.12. The Company shall discontinue to process personal data in the event that:

7.12.1. It has achieved the purposes of personal data processing;

7.12.2. The consent from the Data Subject to the processing of their personal data is expired or revoked;

7.12.3. Personal data are found to be processed illegally;

7.12.4. The legal grounds for personal data processing cease to exist.

7.13. The designated persons of the Company shall exercise control over the storage and use of

tangible media containing personal data, preventing any unauthorized use, update, distribution and destruction of personal data on such media.

7.14. The storage period of personal data in a form that makes it possible to identify the Data Subject shall be no longer than that required by the purposes of the personal data processing, except in cases where the storage period of personal data is not established by a federal law or by an agreement to which the Data Subject is a party, beneficiary or guarantor.

7.15. In order to comply with the legislation of the Russian Federation, achieve the purposes of processing, as well as in the interests and with the consent of Data Subjects, in the course of its activities, the Company shall provide the personal data to the following organizations:

7.15.1. Federal Tax Service;

7.15.2. Pension Fund of Russia;

7.15.3. Bodies of the Ministry of Internal Affairs of Russia;

7.15.4. Regulatory authorities of state power and local self-government;

7.15.5. Marshal Medical Center, LLC.

8. UPDATING, CORRECTION, DELETION AND DESTRUCTION OF PERSONAL DATA, RESPONSES TO REQUESTS FROM DATA SUBJECTS FOR ACCESS TO THEIR PERSONAL DATA

8.1. In the event that personal data are found to be processed illegally, the Company shall block the unlawfully processed personal data.

8.2. In the event that personal data are found to be inaccurate, the Company shall block the relevant personal data for the duration of the verification. In the event that personal data are proved to be inaccurate, on the basis of information provided by the Data Subject or the representative or the authorized body for the protection of the rights of data subjects, or other necessary documents, the Company shall update and unblock the personal data.

8.3. The Company shall inform the Data Subject or their representative of the processing of personal data belonging to such Data Subject upon their request.

8.4. Information concerning the personal data processing shall be provided to the Data Subject or their representative upon request from the Data Subject or their representative. The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

8.5. Review of requests from Data Subjects or their representative and from the authorized body for the protection of the rights of data subjects:

8.5.1. Data Subjects shall be entitled to receive information regarding the processing of their personal data, including:

8.5.1.1. Confirmation of the processing of their personal data in the Company;

8.5.1.2. Legal grounds and purposes of processing personal data;

8.5.1.3. Methods of processing personal data used in the Company;

8.5.1.4. Processed personal data related to the relevant Data Subject and the source of their receipt, unless any other procedure for submitting such data is provided for by a federal law;

8.5.1.5. Terms of the personal data processing, including the terms of their storage in the Company;

8.5.1.6. The procedure for the Data Subject to exercise their rights as provided for by the legislation of the Russian Federation in the field of personal data;

8.5.1.7. Other information provided for by the legislation of the Russian Federation in the field of

personal data.

8.5.2. Upon request from the Data Subject or their representative, or from the authorized body for the protection of the rights of data subjects, the Company shall provide information within the timeframes as required by Article 20 of Federal Law No. 152-FZ On Personal Data, dated 27.07.2006.

8.6. Data Subjects may demand that the Company updates, blocks or destroys their personal data if such personal data are incomplete, outdated, inaccurate, illegally obtained or unnecessary for the stated purpose of processing, and also to take action as provided by law to protect their rights;

8.7. The right of the Data Subject to access their personal data may be restricted in accordance with federal laws, including where the Data Subject's access to their personal data violates the rights and legitimate interests of any third party.

8.8. In order to obtain the necessary information regarding personal data processing described in Paragraph 8.5.1 hereof, the Data Subject (or their legal representative) shall mail a request from the Data Subject for information regarding the processing of their personal data or hand it over in person to employees of the Company who are responsible for receiving requests.

8.9. In order to update certain personal data, the Data Subject (or their legal representative) shall mail a request from the Data Subject for information regarding the processing of their personal data or hand it over in person to employees of the Company who are responsible for receiving requests.

8.10. In order to avoid the illegal processing of personal data, the Data Subject (or their legal representative) shall mail the relevant request from the Data Subject or hand it over in person to employees of the Company who are responsible for receiving requests.

8.11. In order to revoke the Data Subject's consent to the processing of their personal data, the Data Subject (or their legal representative) shall mail the relevant request to revoke the Data Subject's consent to the processing of their personal data or hand it over in person to employees of the Company who are responsible for receiving requests. In the event that the Data Subject withdraws their consent to processing their personal data, the Company shall be entitled to continue processing personal data without the consent of the Data Subject, provided that there are grounds specified in Paragraphs 2–11 of Part 1 of Article 6, Part 2 of Article 10 and Part 2 of Article 11 of Federal Law No. 152-FZ On Personal Data, dated 27.07.2006.

8.12. Where the purposes of personal data processing are achieved, or in the event that the Data Subject withdraws their consent to processing their personal data, the personal data shall be destroyed, unless:

8.12.1. Otherwise provided for by an agreement to which the Data Subject is a party, beneficiary or guarantor;

8.12.2. Otherwise provided for by another agreement between the Company and the Data Subject.

8.13. Upon receipt of a request from the Data Subject or their representative, or from the authorized body for the protection of the rights of data subjects to eliminate violations of the law committed during personal data processing, or to clarify, block or destroy the personal data, the Company shall take the appropriate actions and shall notify of the actions taken within the timeframes as required by Article 21 of Federal Law No. 152-FZ On Personal Data, dated 27.07.2006.

9. FINAL PROVISIONS

9.1. This Policy shall be an internal document of the Company and shall be publicly available and

published on the Company's official website.

9.2. This Policy may be changed or supplemented in the event that there are new legislative acts and special regulatory documents on the processing and protection of personal data, but not less than once every three years.

9.3. Compliance with this Policy shall be monitored by the person responsible for organizing the processing of personal data in the Company.

9.4. The liability of the Company's officials with access to personal data for failure to comply with the regulations governing the processing and protection of personal data shall be determined in accordance with the legislation of the Russian Federation and internal documents of the Company.