**Personal Data Processing Policy**
**of Alpha-Ritm Limited Liability Company**

## 1. General Provisions

1.1. This Personal Data Processing Policy of RM Limited Liability Company (the "Policy") was developed in accordance with the requirements set out in Article 18.1(1)(2) of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" (the "Personal Data Law") to ensure the protection of the rights and freedoms of individuals and citizens when processing their personal data, including the protection of the rights to privacy, personal and family secrets.
1.2. The Policy shall apply to all personal data processed by Alpha-Ritm Limited Liability Company (the "Data Controller" or "Alpha-Ritm LLC").
1.3. The Policy shall apply to the Data Controller's relations arising from the processing of personal data whether before or after the approval of this Policy.
1.4. In pursuance of the requirements set out in Article 18.1(2) of the Personal Data Law, this Policy is published in the public domain in on the Data Controller's website on the Internet.
1.5. Main Terms Used in the Policy.
**personal data** shall mean any information relating directly or indirectly to a specific or identifiable individual (personal data owner);
**personal data controller (data controller)** shall mean a government authority, municipal body, legal entity or individual who organize and/or process personal data, whether independently or jointly with other persons, and determine the purposes of processing personal data, composition of processable personal data and actions (operations) performed with respect to personal data;
**personal data processing** shall mean any action (operation) or set of actions (operations) involving personal data done or made using or without using automation tools. Personal data processing shall include, but not limited to:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- clarification (updating, modifying);
- retrieval;
- use;
- provision (distribution, making available or accessible);
- depersonalization;
- blocking;
- deletion;
- destruction;

**automated processing of personal data** shall mean the processing of personal data using computer equipment;
**dissemination of personal data** shall mean actions aimed at disclosing personal data to general public;
**provision of personal data** shall mean actions aimed at disclosing personal data to a specific person or a certain range of persons;
**blocking of personal data** shall mean the temporary cessation of processing personal data (unless processing is required to clarify personal data);
**destruction of personal data** shall mean any actions as resulting in an inability to subsequently restore their contents in a personal data information system and/or physical data carriers containing the same being destroyed;

**depersonalization of personal data** shall mean actions resulting in the inability to determine whether the personal data belong to a specific personal data owner without using additional information;
**personal data information system** shall mean all personal data contained in databases and information technology and hardware enabling the processing thereof;
**cross-border provision of personal data** shall mean the provision of personal data to a foreign jurisdiction for a foreign government authority, foreign individual or foreign legal entity.

1.6. Data Controller's Basic Rights and Obligations

1.6.1. The Data Controller may:

1) independently determine the set and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the on Personal Data Law and regulations adopted in accordance therewith, unless otherwise provided by the Personal Data Law or other federal laws;
2) entrust the processing of personal data to another person subject to the consent of the personal data owner, unless otherwise provided by federal laws, under a contract executed with such person. A person who processes personal data on behalf of the Data Controller shall comply with the principles and rules for processing personal data provided for in the Personal Data Law;
3) if the personal data owner revokes his or her consent to the processing of his or her personal data, the Data Controller may continue processing the personal data without the consent of the personal data owner if there are grounds specified in the Personal Data Law.

1.6.2. The Data Controller shall:

1) organize the processing of personal data in accordance with the Personal Data Law;
2) respond to requests and inquiries from personal data owners or their legal representatives in accordance with the Personal Data Law;
3) report to the competent authority responsible for the protection of the rights of personal data owners (the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor)), upon request of such authority, the necessary information within 30 days from the date on which such request is received.

1.7. Main Rights of a Personal Data Owner. A personal data owner may:

1) receive information regarding the processing of his or her personal data unless otherwise provided for by federal laws. The information shall be provided to the personal data owner by the Data Controller in an accessible form and must not contain personal data relating to other personal data owners, unless there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining are set out in the Personal Data Law;
2) demand that the Data Controller clarify, block or destroy his or her personal data if the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing and also take steps provided for by laws to protect his or her rights;
3) put forth a condition for giving a prior consent to personal data being processed to promote goods, work or services in the market;
4) appeal to Roskomnadzor or in court against the Data Controller's unlawful actions or omissions associated with the processing of his or her personal data.

1.8. Compliance with the requirements set out in this Policy shall be monitored by the Data Controller's authorized person responsible for organizing the processing of personal data.

1.9. Liability for a failure to comply with the statutory requirements of the Russian Federation and the regulations of Alpha-Ritm LLC for processing and protecting personal data shall be as provided for by the laws of the Russian Federation.

## 2. Purposes of Collecting Personal Data

2.1. The processing of personal data shall be limited to the achievement of specific, predetermined and legitimate purposes. No personal data may be processed where the processing is incompatible with the purposes for which the personal data were collected.

2.2. Only personal data that are consistent with the purposes for which they are to be processed shall be processed.

2.3. Personal data shall be processed by the Data Controller for the following purposes:

- ensuring compliance with the Constitution of the Russian Federation, federal laws and other regulations of the Russian Federation;
- carrying out business activities in accordance with the Charter of Alpha-Ritm LLC;
- keeping HR records;
- providing employment, education and job promotion support for employees, ensuring the personal safety of employees, monitoring the quantity and quality of job responsibilities, ensuring the safety of property;
- recruiting and short-listing candidates seeking employment with the Data Controller;
- arranging the individual (personalized) registration of employees in the compulsory pension insurance scheme;
- filling in and submitting the required reporting forms to executive authorities and other authorized organizations;
- handling civil law relations;
- maintaining accounting records;
- maintaining access control arrangements.

2.4. Personal data of employees may be processed for the purpose of ensuring compliance with laws and other regulations.

## 3. Legal Basis for Personal Data Processing

3.1. The legal basis for the processing of personal data is constituted a set of regulations, pursuant to and in accordance with which the Data Controller processes personal data, including:

- The Constitution of the Russian Federation;
- The Civil Code of the Russian Federation;
- The Labor Code of the Russian Federation;
- The Tax Code of the Russian Federation;
- Federal Law No. 14-FZ dated February 08, 1998 “On Limited Liability Companies”;
- Federal Law No. 402-FZ dated December 06, 2011 "On Accounting";
- Federal Law No.167-FZ dated December 15, 2001 "On Compulsory Pension Insurance in the Russian Federation";
- other regulations governing relations relating to the activities of the Data Controller.

3.2. The legal basis underlying the processing of personal data is also constituted by:

- the Charter of Alpha-Ritm LLC;
- contracts entered into between the Data Controller and personal data owners;
- personal data owners’ consents to their personal data being processed.

## 4. Scope of Personal Data Being Processed and Categories of Personal Data Owners

4.1. The content and scope of personal data to be processed shall correspond to the stated purposes of processing referred to in Section 2 of this Policy. Personal data to be processed shall not be excessive in relation to the stated purposes for which they are processed.

4.2. The Data Controller shall process personal data of the following categories of personal data owners:

4.2.1. Candidates seeking employment with the Data Controller:

- full name;
- sex;
- citizenship;
- date and place of birth;
- contact Information;
- information on education, employment history, qualifications;
- other personal data specified by job seekers in CVs or cover letters.

4.2.2. Employees and former employees of the Data Controller:

- full name;
- sex;
- citizenship;
- date and place of birth;
- image (photo);
- passport details;
- registered residential address:
- actual residential address;
- contact Information;
- taxpayer identification number;
- personal pension account number (SNILS);
- information on education, qualification, vocational and advanced training;
- marital status, children, family ties;
- employment information, including incentives, awards and/or disciplinary sanctions;
- marriage registration data;
- military registration data;
- physical disability information;
- alimony withholding information;
- information on earnings from the previous employment;
- other personal data required to be provided by employees in accordance with labor legislation.

4.2.3. Family members of the Data Controller's employees:

- full name;
- degree of relationship;
- year of birth;
- other personal data required to be provided by employees in accordance with labor legislation.

4.2.4. Customers and counterparties of the Data Controller (individuals):

- full name;
- date and place of birth;
- passport details;
- registered residential address:
- contact Information;
- position held;
- taxpayer identification number;
- bank account number;
- other personal data to be provided by customers and counterparties (individuals) as necessary for entering into and implementing contracts.

4.2.5. Representatives (employees) of the Data Controller's customers and counterparties (legal entities):

- full name;
- passport details;
- contact Information;
- position held;
- other personal data to be provided by representatives (employees) of customers and counterparties as necessary for entering into and implementing contracts.

4.3. The Data Controller shall process biometric personal data (information that characterizes the physiological and biological peculiarities of a person based on which it is possible to establish his or her identity) in accordance with the legislation of the Russian Federation.
4.4. The Data Controller shall not process special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, health status, intimate life unless otherwise provided for by the legislation of the Russian Federation.

## 5. Procedure and Conditions for Processing Personal Data

5.1. Personal data shall be processed by the Data Controller in accordance with the laws of the Russian Federation.
5.2. Personal data shall be processed subject to the consent of personal data owners to their personal data being processed or without such consent where so provided for by the legislation of the Russian Federation.
5.3. The Data Controller shall process personnel data on an automated or non-automated basis.
5.4. The Data Controller's employees whose official duties include the processing of personal data shall be allowed to process personal data.
5.5. Personal data shall be processed by:

- receiving personal data in verbal form or in writing directly from personal data owners;
- sourcing personal data from publicly available sources;
- recording personal data into the Data Controller's logs, registers and information systems;
- using other methods of processing personal data.

5.6. No personal data may be disclosed to third parties or disseminated without the consent of the owner of such personal data, unless otherwise provided for by federal laws. Consent of a personal data owner to his or her personal data being disseminated shall be drawn up separately from other consents of the personal data owner authorizing the processing of his or her personal data.
The requirements for the content of a personal data owner's consent to the processing of personal data authorizing their dissemination were approved by Order No. 18 issued by Roskomnadzor on February 24, 2021.
5.7. Personal data shall be provided to bodies of inquiry, investigation authorities, the Federal Tax Service, the Pension Fund of the Russian Federation, the Social Insurance Fund or other competent executive authorities or organizations in accordance with statutory requirements of the Russian Federation.
5.8. The Data Controller shall implement the necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, distribution and other unauthorized actions, including:

- identifying threats to the security of personal data during their processing;
- adopting local regulations and other documents regulating relations associated with the processing and protection of personal data;
- appointing persons responsible for ensuring the security of personal data in the Data Controller's business units and information systems;
- creating the necessary conditions for handling personal data;
- organize the keeping of records of documents containing personal data;
- organize the handling of information systems where personal data are processed;
- store personal data under conditions that ensure their safety and rule out any unauthorized access thereto;
- make arrangements to train the Data Controller's employees engaged in the processing of personal data.

5.9. The Data Controller shall store personal data in a form that enables the identification of the relevant personal data owner not longer than required for the purposes for which the personal data are processed unless a different period during which they must be stored is required by federal laws or a contract.

5.10. When collecting personal data, including via the Internet, the Data Controller shall ensure that personal data of citizens of the Russian Federation are recorded, systematized, accumulated, stored, clarified (updated, changed) and retrieved using databases located within the Russian Federation unless otherwise provided for in the Personal Data Law.

## 6. Updating, Correcting, Deleting and Destroying Personal Data; Responding to Personal Data Owners' Requests for Accessing Personal Data

6.1. Confirmation of the fact that personal data are processed by the Data Controller, legal grounds for and purposes of processing personal data and other information referred to in Article 14(7) of the Personal Data Law shall be provided by the Data Controller to a personal data owner or his or her representative at the request of the personal data owner or his or her representative.

The information to be so provided shall not include personal data relating to other personal data owners unless there are legal grounds for disclosing such personal data.

The request must contain:

- the number of the main identity document of the personal data owner or of his or her representative, as the case may be, the date on which it was issued and the issuing authority;
- information confirming that the personal data owner is a party to relations with the Data Controller (contract number, date of the contract, conditional verbal designation and/or other details) or information otherwise confirming the fact that the personal data are processed by the Data Controller;
- signature of the personal data owner or of his or her representative.

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

If the application (request) of a personal data owner does not specify all the necessary information required by the Personal Data Law or the personal data owner does not have the rights authorizing his or her access to the requested information, then a reasoned letter of rejection shall be sent to him or her.

The right of a personal data owner to access his or her personal data may be restricted in accordance with Article 14(8) of the Personal Data Law, including where the access of the personal data owner to his or her personal data infringes upon the rights or legitimate interests of third parties.

6.2. In the event that inaccurate personal data are detected following the submission of a request by a personal data owner, his or her representative or Roskomnadzor, the Data Controller shall block personal data relating to that personal data owner for the verification period once such request is received, unless the blocking of the personal data would infringe upon the rights or legitimate interests of the personal data owner or of third parties.

In the event that the inaccuracy of personal data is confirmed, the Data Controller shall, based on information provided by the personal data owner or his or her representative or Roskomnadzor or based on other necessary documents, clarify the personal data within seven business days from the date on which such information is provided and de-block the personal data.

6.3. In the event that any unlawful processing of personal is discovered following the submission of a request by a personal data owner or his or her representative or Roskomnadzor, the Data Controller shall block the unlawfully processed personal data relating to that personal data owner once the request is received.

6.4. Upon the achievement of the purposes for which personal data are processed or if the personal data owner revokes his or her consent to the processing thereof, the personal data shall be destroyed:

- unless otherwise provided for by the contract, to which the personal data owner is a party, beneficiary or guarantor;
- if the Data Controller is not authorized to process the same without the consent of the personal data owner on the grounds provided for by the Personal Data Law or other federal laws;
- unless otherwise provided for by any other agreement between the Data Controller and the personal data owner.