

FOUNDER'S POLICY
PERSONAL DATA PROCESSING POLICY dated 10.10.24

Moscow

10.10.2024

This Policy of the Limited Liability Company Apicenna regarding the personal data processing (hereinafter - the Policy) is developed in compliance with the requirements of clause 2 part 1 of Article 18.1 of the Federal Law dated 27.07.2006 No. 152-ФЗ "On Personal Data" (hereinafter - the Personal Data Law) in order to ensure the protection of human and civil rights and freedoms in the processing of personal data, including the protection of the right to privacy, personal and family secrecy.

The Policy applies to all personal data processed by Limited Liability Company Apicenna (hereinafter - the Operator, the Website Administrator). This policy is divided into two parts for the convenience of all subjects handled by the Operator:

1. Policy of processing personal data of Applicants;
2. Policy of processing personal data of website users (Potential clients, Operator's clients and other users)

The Policy applies to the relations in the field of personal data processing incurred by the Operator both before and after the approval of this Policy.

Pursuant to the requirements of part 2 of Article 18.1 of the Personal Data Law, this Policy is published in free access in the information and telecommunication network Internet on the Operator's website.

TERMS

1.1. The following terms are used in this Privacy Policy:

1.1.1. "Personal data" - any information relating directly or indirectly to a specific or identifiable individual (personal data owner).

1.1.2. "User" - an individual who has access to the Website via the Internet and uses the Website and/or its Services in accordance with their functionality.

1.1.3. "Website Administration" - Personal Data Operator (Limited Liability Company Apicenna, address (location): 105066, Moscow, Nizhnyaya Krasnoselskaya ul., house 35, building 5, room 2, premises I, ground floor.

1.1.4. "Applicant" - any individual who visits the Website and provides information about themselves to the Operator by completing and submitting a response form on the Website and/or submitting a CV for job openings on the Website, and/or sending a CV via the Website or directly to the Operator's email regardless of the Jobs posted on the Website.

1.1.5. "Potential Clients" - any person who intends to receive information about the Company's services and who has left their personal data on the Company's website.

1.1.6. "Client" - a person who is the Company's counterparty under the contract

1.1.7. "Service" - a section of the Website available to the User that has a certain functionality.

1.1.8. "Company's Website" - a set of software, information and media tools logically linked together, of which the Company is the owner or user (on the basis of a contract/agreement concluded by the Company with the owner of the website).

1.1.9. "Personal Data Processing" - any action (operation) or a set of actions (operations) performed using automation tools or without using such tools in relation to personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data.

- **Automated personal data processing** - personal data processing with the help of computing equipment.
- **Dissemination of personal data** - actions aimed at disclosure of personal data to an indefinite number of persons.
- **Provision of personal data** - actions aimed at disclosure of personal data to a definite person or a definite number of persons.
- **Blocking of personal data** - temporary suspension of personal data processing (except for cases when processing is necessary to clarify personal data).
- **Destruction of personal data** - actions, as a result of which it becomes impossible to restore the content of personal data in the information system of personal data and (or) as a result of which physical carriers of personal data are destroyed.
- **Anonymization of personal data** - actions, as a result of which it becomes impossible to determine the belonging of personal data to a particular subject of personal data without using additional information.
- **Personal data information system** - a set of personal data contained in databases and ensuring their processing, information technologies and technical means.
- **Cross-border transfer of personal data** - transfer of personal data to the territory of a foreign country, to a foreign government authority, a foreign individual or a foreign legal entity.

1.1.10. "Confidentiality of personal data" - a requirement mandatory for observance by the Website Administration or any other person who has obtained access to personal data not to allow their dissemination without the consent of the subject of personal data or the presence of another legal basis.

1.1.11. "Cookies" - a piece of data sent by a web-server and stored on the User's computer, which a web-client or web-browser sends to a web-server in an HTTP request each time it tries to open a page of the Website.

1.1.12. "IP-address" - a unique network address of a node in a computer network built using the IP protocol.

PERSONAL DATA PROCESSING OF WEBSITE USERS' PERSONAL DATA (POTENTIAL CLIENTS, CLIENTS AND OTHER USERS)

2. Basic rights of the Website Users

2.1. For the purposes of this Policy, the User's personal information shall mean:

2.1.1. Personal information that the User provides about themselves when registering (creating an account) or while using the Services, including

the User's personal data. Information mandatory for the provision of the Services is specifically marked. Other information is provided by the User at their discretion.

2.1.2. Data that are automatically transmitted to the Website Services in the process of their use by means of the software installed on the User's device, including IP-address, cookie data, information about the User's browser (or other program by means of which the Services are accessed), technical characteristics of equipment and software used by the User, date and time of access to the Services, addresses of requested pages and other similar information.

2.1.3. Other information about the User, which may be processed on the Website.

2.1.4. This Privacy Policy applies only to the Website www.apicenna.ru.

The Website www.apicenna.ru does not control and is not responsible for the websites of third parties that the User can access through the links available on the Website www.apicenna.ru.

3. PURPOSES AND METHODS OF PROCESSING USERS' PERSONAL INFORMATION

The Operator processes personal data of users of the Operator's website (hereinafter - the user) for the following purposes:

- identification of the user registered on the website for personalization of information materials (size of client discount, terms and conditions of cooperation) and delivery of ordered goods;
- providing the user with access to personalized resources of the website;
- establishing feedback with the user, including sending notifications, requests regarding the use of the website, the provision of services, processing requests and applications from the user.
- determining the location of the user to ensure security, prevent fraud.
- confirmation of the accuracy and completeness of personal data provided by the user.
- creating an account on the website, if the user has consented to the creation of an account;
- notifying the user of the website about the availability of goods that were previously out of stock;
- providing the user with effective client and technical support in case of problems related to the use of the website.

3.1. The website collects and stores only the personal information that is necessary for the provision of Services or fulfillment of agreements and contracts with the User, except in cases where the legislation provides for mandatory storage of personal information for a period of time specified by law.

3.2. The Website processes the User's personal information for the following purposes:

3.2.1. Identification of the User registered on the Website;

3.2.2. Providing the User with access to personalized resources of the Website;

- 3.2.3. Establishing feedback with the User, including sending notifications, requests regarding the use of the Website, the provision of services, processing requests and applications from the User.
- 3.2.4. Determining the location of the User to ensure security, prevent fraud.
- 3.2.5. Confirmation of the accuracy and completeness of personal data provided by the User.
- 3.2.6. Notifying the Website User about news;
- 3.2.7. Providing the user with effective client and technical support in case of problems related to the use of the Website.
- 3.2.8. Implementation of advertising activities upon the consent of the User.
- 3.2.9. Conducting statistical and other studies based on anonymized data.

3.3. Processing of personal information of the User by the Website Administration is performed by all legal methods, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal information both with the use of automation tools and without them.

4. TERMS AND CONDITIONS OF PROCESSING USER'S PERSONAL INFORMATION AND ITS TRANSFER TO THIRD PARTIES

4.1. The Website stores the User's personal information in accordance with the internal regulations of specific Services.

4.2. The User's personal information is kept confidential, except for cases when the User voluntarily provides information about themselves.

4.3. The Website has the right to transfer the User's personal information to third parties in the following cases:

4.3.1. The User has consented to such actions.

4.3.2. The transfer is necessary for the User's use of a certain Service or for the fulfillment of a certain agreement or contract with the User.

4.3.4. The transfer is provided for by Russian or other applicable legislation under a procedure established by legislation.

4.3.5. In case of the Website sale, the acquirer shall be transferred all obligations to comply with the terms and conditions of this Policy in relation to the personal information received by them.

4.4. Processing of the User's personal data is carried out until the User's revocation by any lawful method.

4.5. The Website Administration processes the User's personal data with the use of automation tools and without automation with transfer over the internal network of the Website Administration and over the Internet, including cross-border transfer of the User's personal data. Processing of Users' personal data is carried out in accordance with the Federal Law dated 27.07.2006 No. 152-ФЗ "On Personal Data".

4.6. If the Website Administration, Roskomnadzor or any other interested party reveals the fact of unlawful or accidental transfer (provision, distribution) of personal data (access to personal data) resulting in violation of the User's rights, the Website Administration:

- within 24 hours - notifies Roskomnadzor about the incident, the alleged reasons that led to the violation of the rights of personal data subjects, the alleged harm caused to the rights of personal data subjects, and the measures taken to eliminate the consequences of the incident, as well as provides information about the person authorized by the Operator to interact with Roskomnadzor on issues related to the incident;
- within 72 hours - notifies Roskomnadzor of the results of the internal investigation of the identified incident and provides information on the persons whose actions caused the incident (if any).

4.7. The Website Administration shall take the necessary organizational and technical measures to protect the User's personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

4.8. The Website Administration, together with the User, shall take all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the User's personal data.

4.9. The Website Administration does not verify the accuracy of the personal data provided by the User. Thus, the Website Administration proceeds from the fact that the User provides reliable personal data and keeps them up to date.

5. OBLIGATIONS OF THE PARTIES

5.1. The User is obliged to:

5.1.1. Provide personal data necessary to use the Website.

5.1.2. Update, supplement the provided personal data in case of changes in such information.

5.2. The User has the right to:

5.2.1. At any time, demand from the Website Administration to stop processing of their personal data by sending a request to the e-mail address: info@apicenna.ru.

5.2.2. Receive information regarding the processing of their Personal data, including that provided for in part 7 of Article 14 of the Federal Law dated 27.07.2006 No. 152-ФЗ "On Personal Data".

5.3. The Website Administration is obliged to:

5.3.1. Use the information obtained solely for the purposes specified in this Privacy Policy.

5.3.2. Ensure that confidential information is kept in secret, not disclosed without prior written authorization of the User, as well as not to sell, exchange, publish or disclose by other possible means the transferred personal data of the User, except as provided for in this Privacy Policy.

5.3.3. Take precautions to protect the User's personal data confidentiality in accordance with the procedure usually used to protect this kind of information in the existing business practices.

5.3.4. Block personal data related to the respective User from the moment of application or request of the User or their legal representative

or the authorized body for the protection of the rights of personal data subjects for the period of verification in case of identification of inaccurate personal data or unlawful actions.

5.3.5. Provide the User, at their request, with information regarding the processing of their personal data, including that provided for in part 7 of Article 14 of the Federal Law of 27.07.2006 No. 152-ФЗ "On Personal Data".

5.3.6. If the User appeals to the Website Administration with a request to stop personal data processing within a period not exceeding 10 working days from the date of receipt by the Website Administration of the relevant request, the personal data processing shall be stopped, except for cases provided for by the Personal Data Law. This period may be extended, but not more than five working days. For this purpose, the Website Administration should send to the User a motivated notification indicating the reasons for the extension of the period.

6. LIABILITY OF THE PARTIES

6.1. The Website Administration, which has not fulfilled its obligations, shall be liable for losses incurred by the User in connection with the unauthorized use of personal data, in accordance with the legislation of the Russian Federation.

6.2. In case of loss or disclosure of confidential information the Website Administration is not responsible if this confidential information:

6.2.1. Became public domain before its loss or disclosure.

6.2.2. Was received from a third party before it was received by the Website Administration.

6.2.3. Was disclosed with the consent of the User.

7. DISPUTE RESOLUTION

7.1. Before starting a lawsuit in respect of disputes arising from the relationship between the website User and the Website Administration, it is mandatory to submit a claim (a written proposal for a voluntary dispute settlement).

7.2. The recipient of the claim, within 30 calendar days from the date of receipt of the claim, shall notify the claimant in writing about the results of the claim review.

7.3. If an agreement is not reached, the dispute will be referred to the court in accordance with the applicable law of the Russian Federation.

7.4. The applicable law of the Russian Federation applies to this Privacy Policy and the relationship between the User and the Website Administration.

8. ADDITIONAL TERMS AND CONDITIONS

8.1. The Website Administration shall have the right to amend this Privacy Policy without the consent of the User.

8.2. The new Privacy Policy shall come into force from the moment it is posted on the Website, unless otherwise provided by the new edition of the Privacy Policy.

8.3. Any suggestions or questions about this Privacy Policy should be directed to info@apicenna.ru.

8.4. The current Privacy Policy is available on the page at: www.apicenna.ru.