

PERSONAL DATA PROCESSING POLICY
In the Limited Liability Company
"CENTICORE SOLUTIONS"

City of Moscow

2024

1. General Provisions

1.1. The Personal Data Processing Policy of LLC "Centicore Solutions" (hereinafter referred to as the "Policy") outlines the fundamental principles, objectives, conditions, and methods for processing personal data. It specifies the categories of subjects and personal data processed by LLC "Centicore Solutions" (hereinafter referred to as the "Operator" or "Company"), defines the functions related to personal data processing, details the rights of personal data subjects, and establishes the Operator's requirements for personal data protection.

1.2. This Policy is developed in accordance with the Constitution of the Russian Federation, as well as relevant legislative and regulatory acts of the Russian Federation concerning personal data.

1.3. The provisions of this Policy form the basis for the creation of internal regulatory documents that govern the processing of personal data of the Operator's employees and other personal data subjects.

1.4. In compliance with part 2 of article 18.1 of the Federal Law of July 27, 2006, No. 152-FZ "On Personal Data," this Policy is made available to the public on the Operator's website and through other means of dissemination in the information and telecommunication network, the Internet.

2. Legislative and Other Regulatory Legal Acts of the Russian Federation, According to Which the Policy is Determined

2.1. The Policy on personal data processing within the Company is governed by the following regulatory legal acts:

- The Labor Code of the Russian Federation
- Federal Law of July 27, 2006, No. 152-FZ "On Personal Data"

- Presidential Decree of the Russian Federation dated March 6, 1997, No. 188 "On Approving the List of Confidential Information"
- Resolution of the Government of the Russian Federation dated September 15, 2008, No. 687 "On Approving the Regulation on Specifics of Personal Data Processing without the Use of Automation Tools"
- Resolution of the Government of the Russian Federation dated July 6, 2008, No. 512 "On Approving Requirements for Material Carriers of Biometric Personal Data and Technologies for Storing Such Data Outside of Information Systems of Personal Data"
- Resolution of the Government of the Russian Federation dated November 1, 2012, No. 1119 "On Approving Requirements for Personal Data Protection During Their Processing in Personal Data Information Systems"
- Order of the Federal Technical and Export Control Service of Russia dated February 18, 2013, No. 21 "On Approving the Composition and Content of Organizational and Technical Measures to Ensure the Security of Personal Data During Their Processing in Personal Data Information Systems"
- Order of the Federal Service for Supervision of Communications, Information Technology, and Mass Media of September 5, 2013, No. 996 "On Approving Requirements and Methods for Anonymizing Personal Data"
- Other regulatory legal acts of the Russian Federation and regulatory documents of authorized government bodies

2.2. To implement the provisions of this Policy, the Company will develop and maintain the following internal regulatory documents:

- Regulations on Working with Personal Data of the Operator's Employees
- Other internal regulatory documents governing the Company's data processing issues

3. Key Terms and Definitions Used in the Operator's Internal Regulatory Documents Governing Personal Data Processing Issues

- **Personal Data:** Any information relating to an identified or identifiable individual (personal data subject).
- **Personal Data Allowed by the Subject for Distribution:** Personal data to which the subject has granted access to an unlimited number of persons by consenting to the processing of such data in accordance with current Russian Federation legislation.
- **Information:** Data (messages, information) regardless of its form or presentation.
- **Operator:** A state body, municipal body, legal entity, or individual that organizes and/or carries out personal data processing independently or jointly with others and determines the purposes of personal data processing, the types of personal data to be processed, and the actions (operations) performed with personal data.
- **Personal Data Processing:** Any action (operation) or set of actions (operations) performed with personal data using automated means or manually, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction.
- **Automated Personal Data Processing:** Processing of personal data using computer technology.
- **Provision of Personal Data:** Actions aimed at disclosing personal data to a specific person or a specific circle of persons.
- **Distribution of Personal Data:** Actions aimed at disclosing personal data to an indefinite circle of persons.

- **Cross-Border Transfer of Personal Data:** Transfer of personal data to a foreign state, foreign state authority, foreign individual, or foreign legal entity.
- **Blocking of Personal Data:** Temporary suspension of personal data processing (except when processing is necessary for data clarification).
- **Destruction of Personal Data:** Actions resulting in the complete and irreversible removal of personal data from the information system and/or destruction of the data carriers.
- **Anonymization of Personal Data:** Actions that make it impossible to identify the personal data subject without additional information.
- **Personal Data Information System:** A collection of personal data contained in databases, along with the information technologies and technical means that ensure their processing.

4. Principles of Personal Data Processing

4.1. Scope of Processing The Company, as the operator of personal data, processes personal data of its employees, individuals who have left the Company, job candidates, and other personal data subjects.

4.2. Principles of Processing Personal data processing within the Company adheres to the following principles to ensure the protection of the rights and freedoms of individuals, including privacy and personal and family secrets:

- **Legal and Fair Processing:** Personal data processing is conducted on a lawful and fair basis.
- **Purpose Limitation:** Personal data processing is limited to achieving specific, pre-defined, and legitimate purposes.
- **Incompatibility Avoidance:** Personal data processing for purposes that are incompatible with the original purposes of collection is prohibited.

- **Database Segregation:** Combining databases containing personal data for incompatible purposes is not allowed.
- **Relevance:** Only personal data necessary for the declared purposes of processing is processed.
- **Adequacy and Accuracy:** The content and volume of processed personal data must align with the declared purposes. Excessive processing beyond these purposes is prohibited. The accuracy, sufficiency, and relevance of personal data are maintained, with measures taken to correct or delete incomplete or inaccurate data.
- **Storage Limitation:** Personal data is stored in a form that permits identification of the data subject only for as long as necessary to achieve the purposes of processing, unless a longer period is mandated by federal law, a contract involving the data subject, or other legal requirements.
- **Destruction or Anonymization:** Processed personal data is destroyed or anonymized once the purposes of processing are fulfilled or if there is no longer a need for processing, unless otherwise stipulated by Russian Federation legislation.

5. Objectives of Processing, Categories of Personal Data Subjects, Categories and List of Processed Personal Data, Methods, Periods of Processing and Storage, and Procedure for Destroying Personal Data upon Achieving the Objectives or upon the Occurrence of Other Lawful Grounds

5.1. Categories of Personal Data Subjects:

5.1.1. Individuals Employed by the Operator (Including Former Employees)

- **Purpose:** Personnel management, accounting of employees, regulation of labor relations, and compliance with labor, tax, military records, state statistical accounting, and other legal requirements.

- **Processed Personal Data:** Last name, first name, patronymic, phone number, email address, passport details (series, number, issuing authority, date), date of birth, place of birth, nationality, gender, TIN (Taxpayer Identification Number), SNILS (Insurance Number of Individual Ledger Account), education and qualifications, awards, incentives, honorary titles, employment history, marital status, name change documentation, military records, wage calculation data, health status, residential and/or registration address, photo, academic titles, driver's license information.
- **Method of Processing:** Mixed (automated and non-automated)
- **Periods of Processing and Storage:** As required by labor and tax laws.
- **Procedure for Destruction:** Personal data is destroyed by a responsible person, documented with an act of destruction.

5.1.2. Job Candidates

- **Purpose:** To attract and select candidates for employment.
- **Processed Personal Data:** Last name, first name, patronymic, phone number, email address, education, work experience, and other information provided in resumes or applications.
- **Method of Processing:** Mixed (automated and non-automated)
- **Periods of Processing and Storage:** Until a decision is made regarding employment or non-compliance with the vacancy.
- **Procedure for Destruction:** Personal data is destroyed by a responsible person, documented with an act of destruction.

5.1.3. Clients and Counterparties of the Operator (Individuals)

- **Purpose:** To conclude and execute contracts.
- **Processed Personal Data:** Last name, first name, patronymic, phone number, email address, passport details (series, number, issuing authority, date), TIN, SNILS, residential and/or registration address, bank details.
- **Method of Processing:** Mixed (automated and non-automated)
- **Periods of Processing and Storage:** As required by tax and accounting laws.

- **Procedure for Destruction:** Personal data is destroyed by a responsible person, documented with an act of destruction.

5.1.4. Representatives/Employees of Clients and Counterparties of the Operator (Legal Entities)

- **Purpose:** To execute contracts involving legal entities.
- **Processed Personal Data:** Last name, first name, patronymic, phone number, email address.
- **Method of Processing:** Mixed (automated and non-automated)
- **Periods of Processing and Storage:** Until the contract expires or representatives/employees change.
- **Procedure for Destruction:** Personal data is destroyed by a responsible person, documented with an act of destruction.

5.1.5. Registered Users of the Operator's Website

- **Purpose:** To provide personalized services and features.
- **Processed Personal Data:** First name, email address.
- **Method of Processing:** Mixed (automated and non-automated)
- **Periods of Processing and Storage:** Until consent for processing is revoked.
- **Procedure for Destruction:** Personal data is destroyed by a responsible person, documented with an act of destruction.

5.1.6. Clients, Potential Clients

- **Purpose:** To inform about products, services, promotions, and offers via telephone, SMS, and email.
- **Processed Personal Data:** Last name, first name, patronymic, phone number, email address, region/city, profession/position.
- **Method of Processing:** Mixed (automated and non-automated)
- **Periods of Processing and Storage:** Until consent for processing is revoked.
- **Procedure for Destruction:** Personal data is destroyed by a responsible person, documented with an act of destruction.

5.1.7. Other Personal Data Subjects

- **Purpose:** To implement processing objectives specified in section 4 of the Policy.
- **Processed Personal Data:** Categories and lists of personal data, processing periods, and destruction procedures are determined by Russian Federation legislation and local regulatory acts of the Operator, considering the purposes of processing.

5.2. Special Categories of Personal Data

- Processing of personal data related to race, nationality, political views, religious or philosophical beliefs, or intimate life is not carried out.

5.3. Cross-Border Data Transfer

- The Operator does not perform cross-border data transfers.

5.4. Biometric Data

- Processing of biometric personal data is not allowed.

5.5. Personal Data Allowed for Distribution

- Processing of personal data allowed by the subject for distribution is based on the subject's consent and complies with restrictions and conditions set by the subject.

6. Functions of the Operator in Personal Data Processing

While processing personal data, the Operator:

- Takes necessary and sufficient measures to ensure compliance with Russian Federation legislation and the Operator's local regulatory acts regarding personal data.
- Implements legal, organizational, and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, dissemination, and other unlawful actions.
- Appoints a person responsible for organizing personal data processing within the Company.
- Issues local regulatory acts that address personal data processing and protection within the Company.
- Ensures that employees directly involved in personal data processing are familiar with the relevant legislation and local regulatory acts, including requirements for personal data protection.
- Publishes or otherwise ensures unrestricted access to this Policy.
- Informs personal data subjects or their representatives about the existence of personal data concerning them and provides the opportunity to access this data upon request, unless otherwise specified by legislation.
- Terminates the processing and destroys personal data in accordance with Russian Federation legislation.
- Performs any other actions required by Russian Federation legislation in the field of personal data.

7. Conditions for Processing Personal Data by the Operator

7.1. Personal data processing in the Company is permitted in the following cases:

- **With Consent:** Processing is carried out with the consent of the personal data subject, unless otherwise provided by Russian Federation legislation in the field of personal data.
- **Contract Execution:** Processing is necessary for the execution of a contract to which the personal data subject is a party, for concluding a contract at the initiative of the personal data subject, or a contract under which the personal data subject will be a beneficiary or guarantor.
- **Vital Interests:** Processing is necessary for the protection of the life, health, or other vital interests of the personal data subject if obtaining consent is impossible.
- **Statistical or Research Purposes:** Processing is conducted for statistical or other research purposes, except for purposes specified in Article 15 of the Federal Law of July 27, 2006, No. 152-FZ "On Personal Data," provided that personal data is mandatory anonymized.
- **Legal Requirements:** Processing is required for personal data that is subject to publication or mandatory disclosure under Russian Federation legislation.
- **Other Cases:** Any other cases as provided for by Russian Federation legislation.

7.2. The Operator does not disclose or distribute personal data to third parties without the consent of the personal data subject, unless otherwise provided by Russian Federation legislation.

7.3. The Company may entrust the processing of personal data to another entity with the consent of the personal data subject, based on a contract with that entity. The contract must specify the list of actions (operations) with personal data to be performed, the purposes of the processing, the obligation to maintain confidentiality, and ensure the security of personal data during processing, in compliance with Article 19 of the Federal Law of July 27, 2006, No. 152-FZ "On Personal Data."

7.4. For internal information management, the Company may create directories, address books, and other records. With the written consent of the personal data subject, unless otherwise specified by Russian Federation legislation, these records may include their personal data.

7.5. Access to personal data processed by the Company is restricted to authorized employees who are designated to handle personal data, including through information systems.

8. List of Actions with Personal Data, Methods of Processing, Storage, and Destruction

8.1. The Operator performs the following actions with personal data: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction.

8.2. Personal data may be obtained, further processed, and stored both in paper and electronic formats.

8.3. Personal data processing within the Company is carried out in the following ways:

- **Non-automated processing:** Manual handling of personal data.
- **Automated processing:** Using computer technology, with or without the transmission of information via information and telecommunication networks.
- **Mixed processing:** A combination of automated and non-automated methods.

8.4. Personal data recorded on paper is stored in lockable cabinets or rooms with restricted access.

8.5. Personal data processed using automated tools for various purposes are organized into separate folders.

8.6. Storing and placing documents containing personal data in open electronic folders (such as file-sharing services or cloud storage) within the personal data information system is prohibited.

8.7. Upon expiration of the standard storage period for paper documents containing personal data, these documents are destroyed. The responsible employee (or employees) of the Operator performs the physical destruction of paper records.

8.8. Upon expiration of the standard storage period for personal data in electronic form, the responsible employee (or employees) destroys the data from information carriers either by erasing the formatting or physically destroying the carriers.

8.9. The destruction of personal data on both paper and electronic media is documented by an act of destruction.

9. Main Rights of Personal Data Subjects

Personal data subjects have the following rights:

- **Full Information:** To receive complete information about their data processed by the Operator.
- **Access:** To access their data, including the right to obtain a copy of any record containing their data, except as otherwise provided by the legislation of the Russian Federation.
- **Clarification:** To request the clarification, blocking, or destruction of their data if it is incomplete, outdated, inaccurate, illegally obtained, or no longer necessary for the declared purpose of processing.
- **Revocation of Consent:** To revoke their consent to the processing of personal data at any time.
- **Legal Protection:** To take measures provided by law to protect their rights.
- **Appeal:** To appeal actions or inactions of the Operator that violate the requirements of the legislation of the Russian Federation on personal data to the authorized body for the protection of personal data subjects' rights or to the court.
- **Additional Rights:** To exercise any other rights provided by the legislation of the Russian Federation.

10. Measures Taken by the Operator to Ensure the Protection of Personal Data

10.1. The Operator implements the following measures to ensure compliance with obligations under the legislation of the Russian Federation regarding personal data protection:

- **Responsible Person:** Appointing an individual responsible for organizing personal data processing within the Company.

- **Regulatory Documents:** Adopting local regulatory acts and other documents related to the processing and protection of personal data.
- **Safety Conditions:** Ensuring conditions that guarantee the safety of personal data and prevent unauthorized access.
- **Incident Detection:** Detecting incidents of unauthorized access to personal data and taking appropriate measures.
- **Employee Training:** Organizing training and methodological work for employees authorized to handle personal data, including those working with information systems.
- **Consent:** Obtaining consent from personal data subjects to process their data, except where otherwise required by legislation.
- **Data Separation:** Separating personal data processed manually from other information, particularly by storing them on separate physical carriers in designated sections.
- **Storage Separation:** Ensuring separate storage of personal data and their physical carriers that are processed for different purposes and contain different categories of data.
- **Transmission Security:** Ensuring the security of personal data during transmission over open communication channels.
- **Threat Identification:** Identifying current threats to the security of personal data in processing systems and developing protective measures.
- **Password Protection:** Setting individual passwords for employees to access information systems based on their job duties.
- **Antivirus Software:** Using certified antivirus software with regularly updated databases.
- **Material Carrier Storage:** Storing physical carriers of personal data under conditions that ensure safety and prevent unauthorized access.
- **Internal Control:** Conducting internal audits to ensure compliance with the Federal Law of July 27, 2006, No. 152-FZ "On Personal Data," related regulations, this Policy, and the Company's local regulatory acts.

- **Other Measures:** Implementing additional measures as required by the legislation of the Russian Federation.

10.2. Measures to ensure the security of personal data during processing in information systems are defined by the Company's local regulatory acts concerning data security within its information systems.

11. Updating, Correcting, Deleting, and Destroying Personal Data, Responding to Requests for Access to Personal Data

11.1. Upon request, the Operator will provide confirmation of the processing of personal data, including the legal grounds and purposes of processing, as well as other information specified in part 7 of Article 14 of the Federal Law of July 27, 2006, No. 152-FZ "On Personal Data". This information will be provided to the personal data subject or their representative, except when it involves personal data of other individuals, unless legally required.

Requests must include:

- The primary identity document number of the personal data subject or their representative, details of the issuance, and the issuing authority.
- Information confirming the personal data subject's relationship with the Company (such as contract number, contract date, or other relevant details) or other evidence of processing.
- The signature of the personal data subject or their representative.

Requests can be submitted electronically, signed with an enhanced electronic signature as per Russian Federation legislation.

If a request does not meet the requirements of the Federal Law or if the requester lacks access rights, a reasoned refusal will be provided.

The Operator is obligated to allow access to personal data within ten working days from receipt of the request. This period may be extended by up to five additional working days if the Operator notifies the personal data subject with reasons for the extension.

The information will be provided in the form specified in the request unless otherwise indicated. Access to personal data may be restricted in accordance with part 8 of Article 14 of the Federal Law, especially if it would violate the rights and interests of third parties.

11.2. Upon request by the personal data subject, their representative, or Roskomnadzor, if inaccurate personal data is identified, the Operator will block the personal data from the moment of the request until verification is completed, unless blocking would violate the rights of the subject or third parties.

If the inaccuracy is confirmed, the Operator will correct the personal data within seven working days of receiving the necessary documents and will remove the block.

11.3. If unlawful processing is detected upon request by the personal data subject, their representative, or Roskomnadzor, the Operator will block the unlawfully processed data from the moment of the request.

11.4. Personal data will be destroyed upon achieving the purposes of processing or if consent is revoked, unless otherwise stipulated by:

- A contract involving the personal data subject as a party, beneficiary, or guarantor.
- Provisions allowing processing without consent under the Federal Law or other federal laws.
- Another agreement between the Operator and the personal data subject.

12. Control over Compliance with the Legislation of the Russian Federation and Local Regulatory Acts of the Operator in the Field of Personal Data, Including Requirements for Personal Data Protection

- **12.1.** Control over compliance by the Operator's structural units with Russian Federation legislation and local regulatory acts related to personal data protection is conducted to ensure adherence to legal and internal requirements. This includes verifying compliance with personal data processing regulations, preventing and detecting violations, identifying potential data breaches or unauthorized access, and addressing any consequences of such violations.
- **12.2.** Internal control over compliance with personal data protection legislation and local regulatory acts is overseen by the person responsible for organizing personal data processing within the Company.
- **12.3.** The same responsible person ensures compliance with the Federal Law of July 27, 2006, No. 152-FZ "On Personal Data," related normative legal acts, this Policy, and the Operator's local regulatory acts. Personal responsibility for adhering to these requirements, as well as for maintaining the confidentiality and security of personal data within the structural units, is assigned to individuals authorized to handle personal data, including those working with information systems.