

PERSONAL DATA PROTECTION POLICY OF IPQURUM LLC

1. General provisions

- 1.1. The present policy of personal data processing (hereinafter referred to as the Policy) of the Limited Liability Company "IPQURUM") was developed to protect the rights and freedoms of personal data subjects.
- 1.2. By personal data we understand any information which refers directly or indirectly to a specific or identifiable individual (subject of personal data) specified in clause 4.1. of this Policy.
- 1.3. The Company processes personal data in order to protect the rights and freedoms of individuals and citizens in the processing of their personal data, including the right to privacy, personal and family secrecy.

2. PRINCIPLES RELATING TO PERSONAL DATA PROCESSING

2.1 Personal data is processed by the Company in the cases listed below:

2.1.1. carrying out and performing the functions, powers and duties imposed on the Company by the legislation of the Russian Federation, in particular:

- fulfilling the requirements of labor and tax legislation;
- keeping current accounting and tax records, preparing, submitting, filing financial, tax and statistical reports in a timely manner;
- Complying with legal requirements to define data protection procedure of citizens, including employees, participants, clients, attorneys or counterparties of the Company (hereinafter referred to as "personal data subjects");

2.1.2. the Company's activities as provided for by its Charter, and other local regulatory acts of the Company.

3. LAWFUL BASIS FOR PERSONAL DATA PROCESSING

3.1 Personal data shall be processed on the grounds of:

4. The Constitution of the Russian Federation;
 5. The Labor Code of the Russian Federation;
 6. The Civil Code of the Russian Federation;
 7. Federal Law No. 149-FZ of July 27, 2006 "Law on Information, Information Technologies and Information Protection";
 8. The Bill of the Government of the Russian Federation dated September 15, 2008 № 687 "On the peculiarities of personal data processing performed without the use of automation equipment;
- Bill of the Government of the Russian Federation dated to November 1, 2012 № 1119 "On approving the requirements to the protection of personal data in the information systems of personal data;
 - Order of the Federal service for technical and export control dated to February 18, 2013 № 21 "On approving the structure of organization and technical measures to

provide safety of personal data during their processing in personal data information systems";

- Other normative law acts of the Russian Federation and normative documents of the authorized state bodies;
- Charter of the Society;
- Regulations on Personal Data Processing of the Society.

4. STRUCTURE OF PERSONAL DATA PROCESSING

4.1. The Company shall process personal data relating to the following subjects of personal data:

- Members of the Company;
- The Company's employees;
- The Company's counterparties, as well as individuals performing particular types of services (works) for the Company under civil law contracts, which personal data is processed by the Company without distribution and solely for the performance of such contracts;
- Individuals – participants of events organized and held by the Company (awards, contests, forums, conferences, etc.), who provide personal data by filling out the registration form.

4.2 The data subject decides to provide his personal data to the Company and gives consent to their processing freely, at his will and in his interest.

4.3. The Company shall ensure that the content and volume of processed personal data corresponds to the declared cases of data processing and, if necessary, takes measures to eliminate their redundancy.

4.4. The subject's personal data, that involves a transfer by the Company to third parties, includes:

- surname, first name, patronymic name;
- e-mail;
- contact phone number;
- name of the company that the subject represents or works for;
- job role of the subject in the company.

5. Personal data processing

5.1. Personal data is processed in the Company in the “mixed” personal data set.

5.2. Personal data processing is any action (operation) or a set of actions (operations) performed with or without the use of automation equipment with personal data (mixed processing), including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), anonymization, blocking, erasure, destruction of personal data, as well as the transfer in its sole discretion of personal data with respective documents that contain personal data, belonging to third parties.

5.3. We understand by third parties, to whom personal data may be transferred, partners/sponsors of the events, organized by the Company or in the organization of which the Company is directly involved. The list of such third parties is attached on the website of the respective event, to which the Company is immediately related, or by other publicly available means that allow to clearly identify the above mentioned third party.

5.4. All requirements, stated in the Policy and the Bill, are applicable to third parties, subjects of data transfer, including the requirements relating to protection of processed personal data, terms and methods of personal data processing.

6. THE SECURITY OF PERSONAL DATA ENSURED BY THE COMPANY DURING THE PROCESSING

6.1. The Company shall be obliged to take the measures provided by the law to ensure fulfillment of its obligations in line with Federal law dated July 27, 2006 № 152-FZ “On personal data” (hereinafter referred to as “On personal data”) and adopted in accordance with the laws. The Company shall independently set out a managing structure and a list of measures necessary to offer sufficient efficacy to ensure compliance with the obligations under the regulations, according to list provided by Section 3 of these Regulations.

Such measures may include, in particular:

- The Company appoints a person responsible for personal data processing ;
- The Company publishes documents to define the Company's policy with regard to personal data processing, local acts on personal data processing;
- Application of legal, organizational and technical measures to ensure security of personal data;
- Internal control and (or) audit of compliance of personal data processing with the Federal Law "On Personal Data" and other regulatory legal acts adopted in accordance therewith, requirements to personal data protection, the policy of the Company regarding personal data processing, local acts of the Company;
- Assessment of damage which may be caused to personal data subjects in case of violation of the Federal Law "On Personal Data," relation of the above mentioned damage and the measures taken by the Company to ensure the fulfillment of the obligations laid down in the Federal Law "On Personal Data";
- Introducing the Company's employees directly engaged in personal data processing to the provisions of the personal data legislation of the Russian Federation, including the requirements for personal data protection, documents defining the Company's policy on personal data processing, local acts on personal data processing, and (or) training of these employees.

6.2 When processing personal data, the Company shall take necessary legal, organizational and technical measures or ensure their adoption to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution of personal data, as well as from other unlawful actions in relation to personal data.

7. THE RIGHT OF THE DATA SUBJECTS TO ACCESS TO THEIR PERSONAL DATA

7.1 The data subject has the right to demand from the Company the clarification of their personal data, their blocking or destruction, if personal data is incomplete, outdated, inaccurate, illegally obtained or unnecessary for the stated purpose of processing, as well as to take statutory measures to protect their rights.

7.2. Information shall be provided to the subject of personal data or their representative by the Company upon application or upon receipt of request of the subject of personal data or their representative. The request shall contain the number of the main identity document of the data subject or their representative, information on the date of issue of such document and the issuing authority, information confirming the participation of the subject of personal data in relations with the Company (contract number, contract conclusion date, conventional word designation and (or) other information), or information otherwise confirming the processing of personal data by the Company, the signature of the subject of personal data or his/her representative. The request may be sent in the form of an electronic document and signed by e-signature in accordance with the laws of the Russian Federation.

7.3. The Company has the right to refuse the subject of personal data to fulfill a repeated request. Such refusal must be motivated. The Company shall be obligated to provide evidence of the reasonableness of the refusal to comply with the repeated request.

7.4. The subject of personal data has the right to receive information relating to personal data processing, including listed below:

- confirmation of the fact of personal data processing by the Company;
- legal grounds and purposes of personal data processing;
- goals and methods of personal data processing applied by the Company;

- processed personal data relating to the respective personal data subject, their source, unless otherwise provided by the Federal Law "On Personal Data;"

- terms of processing of personal data, including terms of their storage, provided by the Federal Law "On Personal Data";

- procedure for the exercise of their rights by data subject, provided by the Federal Law "On Personal Data";

- information on the cross-border transfer of personal data, performed or expected;
- title or surname, first name, patronymic name and address of the appointed person acting on behalf of the Company to process personal data, if personal data processing is assigned or is to be assigned to such a person.

7.5. If the data subject believes that the Company is processing their personal data in violation of the requirements of the Federal Law "On Personal Data," or otherwise violates their rights and freedoms, the data subject has the right to apply to the Company with a request to cease the processing of personal data of the respective person. Upon receipt of such a request, the Company shall cease to use and process personal data of the respective person, and personal data held by the Company shall be destroyed within 30 (Thirty) calendar days from the date the receipt by the Company of the above-mentioned request of the data subject.

