

POLICY REGARDING THE PROCESSING AND SECURITY OF PERSONAL DATA

1 General Provisions

1.1 Purpose of the document

This Policy on processing and ensuring personal data security (hereinafter referred to as the Policy) is developed on the basis of Art. 18.1 of the Federal Law No. 152-FL "About personal data", taking into account the requirements of the Constitution of the Russian Federation, federal laws, and other regulatory legal acts of the Russian Federation in the field of personal data. This Policy applies to relationships regarding the processing and security of restricted access information, which, in accordance with the legislation of the Russian Federation, is considered personal data (hereinafter referred to as PD), and also determines the responsibility of LLC SPECIALIZED DEVELOPER "IK" AVANGARDINVESTPROEKT" (hereinafter referred to as the Company) and its officials who have access to personal data, for non-compliance with the requirements of the norms of the legislation of the Russian Federation regulating the processing and protection of personal data. This Policy defines the principles, objectives, procedures, and conditions for processing the personal data of the Company's employees and other subjects whose personal data are processed by the Company. This Policy contains provisions regarding the responsibility of the Company and its employees in case of violations of the legislation of the Russian Federation in the processing of personal data. This Policy is a publicly available document and can be provided upon request by PD subjects addressed to the Company.

1.2 Scope of the Document

This Policy does not apply to relationships arising from: the organization of storage, compilation, accounting, and use of documents containing personal data that have the status of archival documents in accordance with the legislation on archival affairs in the Russian Federation; processing of personal data classified, according to the established procedure, as information constituting state secrets. The provisions of this Policy are mandatory for compliance by all employees and other individuals who have contractual relations with the Company.

2 Principles of Personal Data Processing

Personal data processing in the Company is based on the following principles.

1. Personal data processing is carried out on a lawful and fair basis.
2. Personal data processing is limited to achieving specific, predetermined, and lawful purposes.
3. The Company processes only personal data that meets the purposes of their processing.
4. The Company separates databases containing personal data, the processing of which is carried out for incompatible purposes.
5. The content and volume of processed personal data correspond to the stated purposes of processing.
6. The processed personal data is not excessive in relation to the stated purposes of their processing.
7. When processing personal data, accuracy, sufficiency, and, where necessary, relevance to the purposes of processing personal data are ensured.
8. Necessary measures are taken, or their adoption is ensured, to delete or clarify incomplete or inaccurate personal data.
9. Personal data is stored in a form that allows identifying the data subject for no longer than required by the purposes of processing personal data, unless the storage period for personal data is established by federal law, a contract, the party to which, the beneficiary, or the guarantor, is the data subject.
10. Processed personal data is destroyed or depersonalized upon achieving the purposes of processing or in case the need to achieve these purposes is lost, unless otherwise provided by federal law.

3 Purposes of personal data processing

The company processes personal data for the purpose of conducting its activities in accordance with the legislation of the Russian Federation and the Company's Charter.

4 Categories of personal data subjects and categories of processed personal data

4.1 Categories of personal data subjects processed by LLC SZ "IC" AVANGARDINVESTPROJECT

Categories of subjects whose personal data are processed in the Company using automation means or without using them:

1 Subjects whose data are processed within the framework of labor relations, including: - Job applicants to the Company (applicants); - Employees of the Company; - Family members of the Company's employees (spouses, children, and close relatives); - Individuals who have had previous employment relations with the Company.

2. Company's counterparties, including: - Managers, - Representatives of counterparties, - Legal entities and their employees, - Individual entrepreneurs and their employees (if applicable), - Individuals who have or had contractual relations with the Company, including those at the pre-contractual stage of establishing such relations.

3. Company's clients, including: - Individuals (buyers) and their representatives (persons acting under power of attorney, etc.) having contractual relations with the Company; - Visitors of the company's internet store and website; - Participants of the loyalty program.

4. Visitors of the Company

5. Other subjects of personal data not included in the above-mentioned categories, and the processing of personal data of which does not contradict the legislation of the Russian Federation and is necessary for LLC SPECIALIZED DEVELOPER "IC" AVANGARDINVESTPROJECT to achieve the purposes of processing personal data.

4.2 Categories of personal data processed in LLC SZ "IC" AVANGARDINVESTPROJECT.

The following categories of personal data are processed in the Company: - Other categories that cannot be attributed to special categories of personal data, biometric personal data, or publicly available personal data; - Publicly available personal data.

5 Composition of persons organizing and participating in the processing and ensuring the security of personal data

A person responsible for organizing the processing of personal data is appointed in the Company. A person responsible for ensuring the security of personal data in information systems of personal data (hereinafter - ISPD) is appointed in the Company. Employees participate in the processing of personal data in the Company within the framework of their job responsibilities.

6 Processing and ensuring the security of personal data

6.1 Processing and Termination of Personal Data Processing

Processing of Personal Data (PD) in the Company is permitted in the following cases:

- Processing of PD is carried out with the consent of the PD subject for the processing of their PD;
- Processing of PD is necessary for the performance of a contract, to which the PD subject is a party, a beneficiary, or a guarantor, including in cases where the operator exercises its right to assign rights (claims) under such a contract, as well as for concluding a contract at the initiative of the PD subject or a contract under which the PD subject will be a beneficiary or guarantor;
- Processing of PD is necessary for exercising the rights and legitimate interests of the operator or third parties, or for achieving socially significant objectives, provided that the rights and freedoms of the PD subject are not violated;
- Processing of PD is carried out for statistical or other research purposes, provided that PD is anonymized. An exception is the processing of PD for the purpose of promoting goods, works, services on the market by making direct contacts with potential consumers using communication means, as well as for political campaigning;
- Processing of PD is carried out for which an unrestricted circle of persons to whom the PD subject has provided access or at their request;
- Processing of PD is carried out for publication or mandatory disclosure in accordance with federal law;
- Additionally, processing of PD by the Company is possible in other cases provided for by federal legislation. Inclusion by the Company of PD subjects' PD in publicly available sources of PD is possible only if there are requirements of federal legislation or with the written consent of the PD subject. The Company collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts personal data of citizens of the Russian Federation, using databases located in the territory of the Russian Federation.
- The Company carries out cross-border transfer of PD of subjects for the purpose of fulfilling contractual obligations with counterparties only with the consent of the PD subject.
- The Company does not make decisions that generate legal consequences for the PD subject or otherwise affect their rights and legitimate interests solely on the basis of automated processing of PD. The Company may entrust the processing of PD to another

person only with the consent of the PD subject, unless otherwise provided by the legislation of the Russian Federation, based on a contract concluded with this person (hereinafter referred to as the operator's instruction). In this case, the Company obliges the person processing the PD on behalf of the Company to comply with the principles and rules of PD processing provided by the legislation of the Russian Federation. If the Company entrusts the processing of PD to another person, the Company bears responsibility to the PD subject for the actions of the specified person. The person processing the PD on behalf of the Company is responsible to the Company.

- The Company undertakes and obliges other persons who have access to PD not to disclose PD to third parties and not to distribute PD without the consent of the PD subject, unless otherwise provided by the legislation of the Russian Federation. The Company's processing of PD is terminated in the following cases:

- Achieving the purposes of PD processing; - Expiry of the period of PD processing provided for by the legislation of the Russian Federation, contract, or consent of the PD subject to the processing of their PD;

- Upon withdrawal by the PD subject of consent to the processing of their PD, in cases not contrary to the requirements of the legislation of the Russian Federation.

6.2 Information on Implemented Personal Data Protection Requirements

The company takes all necessary legal, organizational, and technical measures in processing personal data to protect it from unauthorized or accidental access, destruction, alteration, blocking, copying, provision, distribution, as well as from other unlawful actions regarding personal data.

Measures are implemented for organizing the processing and ensuring the security of personal data processed without automation means, including:

- For each category of personal data, storage locations (physical media) must be defined, and a list of individuals processing personal data and having access to them must be established.

- Separate storage of personal data (physical media) must be ensured, the processing of which is carried out for different purposes; conditions ensuring the integrity of personal data and excluding unauthorized access during the storage of physical media must be observed.

- Measures are implemented to protect personal data during their processing in personal data information systems, including: The level

of protection of personal data during their processing in information systems is determined. Requirements for protecting personal data in information systems are met in accordance with the defined levels of protection of personal data. Necessary information protection means are applied. The effectiveness of the security measures for personal data is assessed before putting the personal data information system into operation.

Accounting for machine-readable personal data carriers is carried out. Detection of facts of unauthorized access to personal data and taking necessary measures is carried out. Restoration of personal data modified or destroyed due to unauthorized access to them is carried out.

Access rules to personal data processed in personal data information systems are established, and registration and recording of actions performed with personal data in personal data information systems are ensured where necessary. Monitoring of security measures for personal data and the level of security of personal data information systems is carried out.

7 Rights of the personal data subject

The data subject has the right to receive information regarding the processing of their personal data, including:

- Confirmation of the fact of processing of their personal data by the Company.
- Legal grounds and purposes of processing personal data.
- Information on the methods of processing personal data applied by the Company.
- Name and location of the Company, information about individuals (excluding Company employees) who have access to personal data or to whom personal data may be disclosed based on an agreement with the Company or based on Russian Federation legislation.
- Processed personal data related to the respective data subject, the source of their acquisition.
- Terms of processing personal data, including storage periods. - Procedure for exercising the rights of the data subject provided by Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006.
- Information about carried out or planned cross-border transfer of personal data.
- Name or surname, first name, patronymic, and address of the person processing personal data on behalf of the operator if the processing is entrusted or will be entrusted to such person.
- Other information provided by the legislation of the Russian Federation. Information about the existence of personal data must be provided to the data subject by authorized employees of the Company in an accessible form, and it must not contain personal data related to other data subjects. The data subject has the right to request clarification of

their personal data, their blocking or destruction if the personal data are incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the stated purpose of processing, as well as to take measures provided by law to protect their rights. The data subject has the right to withdraw consent to the processing of their personal data, however, the Company may continue to process personal data without the consent of the data subject if there are legal grounds.

For questions related to the processing and protection of your personal data, you can contact the Company by sending a written request to the address: 123112, Moscow, Presnenskaya Naberezhnaya, building 12, office floor 32, room 6. If the data subject believes that the Company is processing their personal data in violation of the requirements of Russian Federation legislation or otherwise violating their rights and freedoms, the data subject has the right to appeal the actions or inaction of the Company to the authorized body for the protection of the rights of personal data subjects (Roskomnadzor).

8 Violation of Policy and Responsibility

The company is responsible for ensuring that the processing and security measures of personal data comply with the legislation of the Russian Federation.

All employees of the company involved in the processing of personal data are responsible for complying with this Policy and other local acts of the company regarding the processing and security of personal data. Any employee who becomes aware of a violation of this Policy or suspects the existence of such a violation must report it to the person responsible for organizing the processing of personal data, in accordance with the existing procedures within the company.

In the event of any violations of the requirements of this Policy, investigations will be conducted in accordance with the existing procedures within the company, and disciplinary measures may be applied in accordance with the labor legislation of the Russian Federation.

In cases where violations of the requirements of this Policy result in breaches of the provisions of the legislation of the Russian Federation, the company reserves the right to refer the matter to law enforcement agencies.