

POLICY

on Personal Data Processing

of LLC "UTG DOMODEDOVO"

1 GENERAL PROVISIONS

1.1 The policy on the processing of personal data of **LLC "UTG DOMODEDOVO"** (hereinafter, the "Company") is developed in accordance with the requirements of Part 2 Article 18.1 of Federal Law dated July 27, 2006 No. 152-FZ "On Personal Data" and is intended to provide unlimited access to information regarding the processing of personal data, as well as to information on the requirements implemented for the protection of personal data in the Company.

1.2 This Policy describes the procedure for processing and protecting personal data of individuals in connection with the implementation of labor relations, the conclusion of contracts and the fulfillment of contractual obligations of the Company, and the performance of the statutory activities of the organization.

1.3 Personal data are classified as confidential information and is protected from unauthorized access, including accidental.

1.4 The current version of the Policy is posted on the Company's website <https://utgtechنيq.ru/>

2 BASIC CONCEPTS IN THE FIELD OF PERSONAL DATA

Personal data: any information relating to a directly or indirectly identified or identifiable individual (personal data subject)

Operator: a state body, a municipal body, a legal entity or an individual, which, independently or jointly with other persons, organizes and/or carries out the processing of personal data, as well as determines the purposes of personal data processing, the composition of personal data subject to processing, actions (operations) performed with personal data

Personal data processing: any action (operation) or set of actions (operations) performed with the use of automation tools or without the use of such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion, destruction of personal data

Automated personal data processing: processing of personal data using computer technology

Dissemination of personal data: actions aimed at disclosing personal data to an indefinite number of persons

Provision of personal data: actions aimed at disclosing personal data to a specific person or a specific group of persons

Blocking of personal data: temporary suspension of personal data processing (except in cases where the 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 personal data information system and/or as a result of which the material carriers of personal data are destroyed

Depersonalization of personal data: actions as a result of which it becomes impossible to determine the ownership of personal data by a specific personal data subject without the use of additional information

Personal data information system: a set of personal data contained in databases and the information technologies and technical means that ensure their processing

Cross-border transfer of personal data: transfer of personal data to the territory of a foreign state to a foreign government body, a foreign individual or a foreign legal entity

Cookie files: small text files located on the user's device and designed to ensure the convenience of using the site and save time.

3 PRINCIPLES AND CONDITIONS OF PERSONAL DATA PROCESSING

3.1 Personal data processing in the Company is carried out on the basis of the following principles:

- the existence of legal grounds for personal data processing;
- limitation of personal data processing to the achievement of specific, predetermined and legitimate purposes;
- preventing the unification of databases containing personal data the processing of which is carried out for incompatible purposes;
- processing only those personal data that meet the purposes of their processing;
- compliance of the content and volume (avoidance of redundancy) of processed personal data with the stated purposes of processing;
- ensuring the accuracy of personal data, their sufficiency and, where necessary, relevance in relation to the purposes of personal data processing;
- the storage of personal data is carried out in a form that allows the identification of the personal data subject no longer than required by the purposes of processing personal data, unless the storage period of personal data is established by the laws of the Russian Federation, an agreement to which the personal data subject is a party, beneficiary or guarantor.

3.2 The Company may process personal data in the following cases:

- the consent of the subject to personal data processing has been obtained;
- personal data processing is necessary for the implementation and performance of the functions, powers and duties imposed on the operator by the laws of the Russian Federation;
- personal data processing is carried out in connection with the personal data subject's participation in civil and arbitration proceedings;
- personal data processing is necessary for the execution of a judicial act in accordance with the laws of the Russian Federation on enforcement proceedings;
- personal data processing is necessary for the performance of an agreement to which the personal data subject is a party, beneficiary or guarantor, as well as for the conclusion of an agreement at the initiative of the personal data subject;
- personal data processing is necessary to protect the life, health or other vital interests of the personal data subject, if obtaining the consent of the personal data subject is impossible;
- personal data processing is necessary for the exercise of the rights and legitimate

interests of the operator or third parties or for the achievement of socially significant goals, provided that this does not violate the rights and freedoms of the subject;

- personal data processing is carried out for statistical or other research purposes, subject to mandatory anonymization of personal data;
- personal data subject to publication or mandatory disclosure in accordance with the laws of the Russian Federation is processed.

4 PURPOSES OF PERSONAL DATA PROCESSING IN THE COMPANY

4.1 Organization, provision and regulation of labor and directly related relations

To ensure compliance with the requirements of the Laws of the Russian Federation and other applicable laws and regulations, including fulfillment of the requirements for conducting an audit of the accounting (financial) statements of the Company, organizing and maintaining HR work, assisting the Company's Employees in employment, education, career advancement, ensuring the opportunity to use the Company's automated services necessary for training, adaptation, career development, managing key HR processes (hiring, transfer to another job, dismissal, etc.), organizing and/or conducting training events, organizing interaction channels (business cards, channels for exchanging news and other information, etc.), assessing competencies in the process of HR events, career development and planning, organizing and/or conducting educational programs for advanced training, professional retraining programs, other training programs, educational solutions, e-courses, other training events (including open format, including webinars, seminars, trainings, lectures, conferences), ensuring equal pay for work of equal value to the Company's Employees, fulfilling the obligations assumed by the Company in relation to the Employees, including in within the framework of employment contracts with Employees, ensuring the possibility of providing Employees with work stipulated by the employment contract, providing Employees with equipment, tools, technical documentation and other means necessary for the performance of their work duties, organizing business trips, ensuring the personal safety of Employees, monitoring the quantity and quality of work performed, ensuring the safety of the Company's property, conducting surveys and receiving feedback on work in the Company, conducting analytical/statistical research, as well as monitoring, including for the purpose of generating management and operational reporting, developing and making management decisions on existing and/or introducing new processes and services, the convenience of their use, identifying and forecasting new business needs and business risks necessary for making management decisions, and implementing other actions arising from the stated purpose of processing personal data and/or aimed at realizing the legitimate interests of the Company, the Company processes personal data of **Employees, dismissed Employees and relatives of Employees.**

4.1.1 In relation to the Company's Employees, in the presence of and taking into account the conditions (legal grounds) for personal data processing, the processing of the following personal data is permitted:

- Personal data included in the category "Other personal data":
 - surname, name, patronymic, sex, date of birth, year of birth and place of birth;
 - information on citizenship/residence;
 - information about education (including academic degree/title, educational institution, year of study, specialty);
 - information about children (including information from the child's birth certificate);
 - profession, qualification, position;
 - marital status, family composition;
 - passport details;
 - information contained in the birth certificate;
 - address (registration address at the place of residence/stay; residence address (actual

address);

- photo;
- phone number,
- information on military registration, military duty;
- information about awards, incentives, honorary titles;
- information about social status;
- pension and health insurance data;
- taxpayer identification number (INN), personal insurance number (SNILS);
- income, amounts of deductions;
- information about holidays;
- bank account details;
- bank card details;
- information about income from the previous place of work;
- information about disability;
- email address;
- information about the change of the identity document, as well as the details of the previously issued identity document;
- migration card details (if any);
- data on tax deductions;
- death certificate/record details;
- audio and video recording, including those carried out for the purpose of ensuring the security of premises;
- signature;
- information on tax status;
- marriage certificate details;
- information on writs of execution/court orders, including information on alimony payments;
- results of training, testing;
- information specified in the driver's license;
- information specified in the vehicle registration certificate;
- information on social and other benefits;
- link to an account on social networks (in case of subscription to the Employer's social networks);
- level of proficiency in foreign languages;
- personnel number;
- data on personnel activities (including dates of hiring/dismissal, transfers to other jobs);
- data on categories for bonuses, bonus coefficients and amounts;
- information on salary and other personal data necessary to achieve the purpose of personal data processing, the collection (receipt) of which is carried out in the presence of and taking into account the conditions (legal grounds) for personal data processing.

➤ Personal data included in the category "Special categories of personal data": information about health conditions.

➤ Personal data included in the category "Biometric personal data": not processed.

4.1.2 In relation to dismissed Employees of the Company:

- Personal data included in the category "Other personal data":
- surname, name, patronymic, sex, date of birth, year of birth and place of birth;
 - address (registration address at the place of residence/stay, residence address (actual address),
 - contact details (phone number, email address);

- citizenship/residence;
- data from identity documents (documents that, in accordance with applicable Russian laws, fall under the category of identity documents);
- information about the change of the previously issued identity document;
- migration card details (if any);
- taxpayer identification number;
- information about education (including education, academic degree/title, educational institution, year of study, specialty);
- signature;
- information on tax status;
- individual insurance account number (SNILS);
- information about children (including information from the child’s birth certificate);
- information about marital status;
- marriage certificate details;
- information on writs of execution/court orders, including information on alimony payments;
- level of proficiency in foreign languages;
- information on social and other benefits;
- link to an account on social networks (in case of subscription to the Employer’s social networks);
- information about work, including information about work experience and work activities (including places of work (name, organization, position, period/length of service));
- personnel number;
- position, business unit, profession;
- data on personnel activities (including dates of hiring, dismissal, transfers to other jobs);
- information on wages and other income received while performing work duties;
- data on categories for bonuses, bonus coefficients and amounts;
- training results, testing results, information on achievements, information on awards and bonuses.

other personal data necessary to achieve the purpose of personal data processing, the collection (receipt) of which is carried out in the presence of and taking into account the conditions (legal grounds) for personal data processing;

➤ Personal data included in the category "Special categories of personal data": not processed.

➤ Personal data included in the category "Biometric personal data": not processed.

4.1.3 In relation to individuals related to Employees, within the framework of the specified purpose, in the presence and taking into account the conditions (legal grounds) for processing personal data, the processing of the following personal data is permitted: in relation to Relatives of Employees:

➤ Personal data included in the category "Other personal data":

- surname, name, patronymic, sex, date of birth, year of birth;
- address (registration address at the place of residence/stay; residence address (actual address));
- citizenship/residence;
- contact details (phone number, email address);
- information from the marriage certificate, marital status, other personal data necessary to achieve the purpose of personal data processing, the collection (receipt) of which is carried out in the presence of and taking into account the conditions (legal grounds) for personal data processing.

➤ Personal data included in the category "Special categories of personal data": not

processed.

- Personal data included in the category "Biometric personal data": not processed.

Processing of information about the health status of employees may be carried out in certain cases strictly in accordance with the laws of the Russian Federation on state social assistance, labor laws, and pension laws of the Russian Federation.

Personal data processing is based on the Labor Code of the Russian Federation; the Tax Code of the Russian Federation; Federal Law dated April 1, 1996 No. 27-FZ "On Individual (Personalized) Accounting in the Compulsory Pension Insurance System"; Federal Law dated December 6, 2011 No. 402-FZ "On Accounting"; Federal Law dated March 28, 1998 No. 53-FZ "On Military Duty and Military Service"; Federal Law dated November 24, 1995 No. 181-FZ "On Social Protection of Disabled Persons in the Russian Federation"; Law of the Russian Federation dated April 19, 1991 No. 1032- "On Employment of the Population in the Russian Federation"; Air Code of the Russian Federation; Federal Law dated November 24, 1995 No. 181-FZ "On Social Protection of Disabled Persons in the Russian Federation"; Federal Law dated August 8, 2001 No. 129-FZ "On State Registration of Legal Entities and Individual Entrepreneurs"; Federal Law dated October 2, 2007 No. 229-FZ "On Enforcement Proceedings", Federal Law dated April 6, 2011 No. 63-FZ "On Electronic Signature", Civil Code of the Russian Federation, Agreement; Consent.

Processing of information on the criminal record of employees may be carried out in certain cases in accordance with the laws of the Russian Federation.

Personal data processing is carried out using automation tools or without the use of such tools.

The period of personal data processing is limited to achieving the stated purpose.

Storage period of personal data:

50 years: from the date of termination of employment / **75 years:** from the date of termination of employment, if recorded before 2023 (original personal documents of employees (work books, diplomas, certificates, certificates, certificates, personnel documents (employment contracts, personal cards of employees, personal cards, employee accounts, personal files (applications, copies of orders and extracts from them, personnel records, questionnaires, certification sheets, etc., orders, instructions on personnel, as well as additions to them (memoranda, certificates, applications, on hiring, transfer, relocation, rotation, combination, part-time work, dismissal, remuneration, certification, advanced training, assignment of class ranks, categories, titles, incentives, awards, changes in personal details and biographical data, parental leave, unpaid leave

5 years: on annually paid leave, leave in connection with training, duty shifts not related to the main (core) activity, on being sent on a business trip.

3 years: on disciplinary sanctions.

In other cases, if the storage period is not established by Russian laws and is not provided for in the Agreement, personal data are stored no longer than is necessary for the purpose of its processing.

The destruction of personal data is carried out within the time frames established by law upon expiration of the storage period or upon the arising of other legal grounds.

4.2 Carrying out personnel selection, forming a personnel reserve, attracting and selecting candidates to provide employment opportunities

For the purpose of attracting and selecting candidates for employment (including organizing interviews and testing to assess business qualities and competencies, forming a personnel reserve, and implementing other actions arising from the stated purpose of processing personal data and/or aimed at realizing the legitimate interests of the Company, the Company processes personal data of **applicants (job seekers) for vacancies**:

- Personal data included in the category "Other personal data":
 - surname, name, patronymic, sex, date of birth, year of birth;
 - photo;
 - contact details (phone number, email address);
 - address (including registration address at the place of residence/stay; residence address (actual address);
 - citizenship/residence;
 - information about employment, including place of work, work experience and work activity, profession;
 - information about education (including qualification, academic degree/title, educational institution, year of study, specialty);
 - information about hobbies, interests, identity;
 - the results of professional testing and testing of other business qualities, other personal data necessary to achieve the purpose of personal data processing, the collection (receipt) of which is carried out in the presence of and taking into account the conditions (legal grounds) for personal data processing.
- Personal data included in the category "Special categories of personal data": not processed.
- Personal data included in the category "Biometric personal data": not processed.

Personal data are processed on the grounds of the Labor Code of the Russian Federation; the Air Code of the Russian Federation; the Consent of the subject.

Personal data processing is carried out using automation tools or without the use of such tools.

The period of personal data processing is limited to achieving the stated purpose. The storage period for personal data of applicants included in the talent pool is 5 years (in case of inclusion in the talent pool) from the moment the relevant decision is made.

The destruction of personal data is carried out within the time frames established by law upon expiration of the storage period, upon the withdrawal of the subject's consent or upon the arising of other legal grounds.

4.3 Ensuring and implementing interaction with third parties on issues related to concluding contracts and within the framework of fulfilling obligations under contracts

To comply with the requirements of the laws of the Russian Federation in the field of tax and accounting, including settlements with personal data subjects, preparation of primary accounting documents, exercise of due diligence, interaction with third parties to conclude contracts or within the framework of fulfilling obligations under concluded contracts, fulfilling the duties stipulated by the applicable laws of the Russian Federation in terms of submitting reports (accounting, tax, other reports) to competent government agencies, institutions, state extra-budgetary funds and other duties, functions, requirements stipulated by the applicable laws of the Russian Federation, performance of other actions arising from the stated purpose of personal data

processing and/or aimed at realizing the legitimate interests of the Company, the Company processes personal data **of third parties** (individual entrepreneurs; persons applying a special tax regime, persons engaged in private practice, persons authorized by legal entities to sign contracts, acting on the basis of a power of attorney or agreement, representatives in accordance with the requirements of the applicable laws of the Russian Federation (lawyer, court-appointed receiver, etc.), employees of third parties, members of the governing body of third parties, etc.):

- Personal data included in the category "Other personal data":
 - surname, name, patronymic, sex, date of birth, year of birth;
 - registration address;
 - citizenship/residence;
 - contact details (phone number, email address);
 - data from identity documents (passport and other documents that, in accordance with applicable Russian laws, fall under the category of identity documents);
 - information about employment, including information about the place of work, position;
 - taxpayer identification number;
 - information on tax status;
 - individual insurance account number (SNILS);
 - signature;
 - agreement number, account number,
 - data from documents confirming the authority of the representative and other personal data necessary to achieve the purpose of personal data processing, the collection (receipt) of which is carried out in the presence of and taking into account the conditions (legal grounds) for personal data processing.
- Personal data included in the category "Special categories of personal data": not processed.
- Personal data included in the category "Biometric personal data": not processed.

Personal data are processed on the grounds of the Tax Code of the Russian Federation; Federal Law dated December 6, 2011 No. 402-FZ "On Accounting"; Civil Code of the Russian Federation, Agreement; Consent of the subject.

Personal data processing is carried out using automation tools or without the use of such tools.

The period of personal data processing is limited to achieving the stated purpose. The storage period for personal data is 5 years from the date of registration of the primary accounting document.

The destruction of personal data is carried out within the time frames established by law upon expiration of the storage period or upon the arising of other legal grounds.

4.4 Provision of services. Establishing communication with personal data subjects

For the purpose of providing paid and free services to personal data subjects; improving the quality of services provided, communicating with personal data subjects to send notices, information and requests related to the Company's activities, as well as processing requests, applications, claims, applications and other messages from personal data subjects, providing personal data subjects with access to the Company's website and its functionality, and performing other actions arising from the stated purpose of processing personal data and/or aimed at realizing the legitimate interests of the Company, the Company may process personal data **of clients and their representatives**:

- Personal data included in the category "Other personal data":

- surname, name, patronymic, date of birth, year of birth;
- address (registration address at the place of residence/stay; residence address (actual address));
- contact details (phone number, email address);
- data from identity documents (passport and other documents that, in accordance with applicable Russian laws, fall under the category of identity documents);
- agreement number;
- signature;
- cookies;
- bank details;
- data from documents confirming the authority of the representative and other personal data necessary to achieve the purpose of personal data processing, the collection (receipt) of which is carried out in the presence of and taking into account the conditions (legal grounds) for personal data processing.

➤ Personal data included in the category "Special categories of personal data": not processed.

➤ Personal data included in the category "Biometric personal data": not processed.

Personal data are processed on the grounds of the Agreement and the Consent of the subject.

Personal data processing is carried out using automation tools or without the use of such tools.

The period of personal data processing is limited to achieving the stated purpose. In case of loss of necessity to achieve the stated goal, personal data is subject to destruction. The destruction of personal data is carried out within the time frames established by law, upon the withdrawal of the subject's consent or upon the arising of other legal grounds.

4.5 Providing access to social and medical services, providing benefits and other corporate privileges

To organize the provision of corporate benefits and privileges to the Company's Employees, including voluntary medical insurance, accident and serious illness insurance, as well as other projects within the framework of corporate health management programs, provision of corporate taxis, holding corporate events, fulfilling the duties stipulated by the applicable laws of the Russian Federation in terms of submitting reports (accounting, tax, other) to competent government agencies, institutions, state extra-budgetary funds and other duties, functions, requirements stipulated by the applicable laws of the Russian Federation, performing other actions arising from the stated purpose of processing personal data and/or aimed at realizing the legitimate interests of the Company, the following personal data are processed in the Company:

➤ Personal data included in the category "Other personal data":

- surname, name, patronymic, sex, date of birth, year of birth;
- address (including registration address at the place of residence/stay; residence address (actual address));
- contact details (phone number, email address, including personal email address/corporate email address);
- citizenship/residence;
- data from identity documents (documents that, in accordance with applicable Russian laws, fall under the category of identity documents);
- information about the change of the identity document, as well as the details of the previously issued identity document;
- migration card details (if any);

- death certificate/record details;
- information about work, including information about work experience and work activities (including places of work (name, organization, position, period/length of service));
- personnel number, place of work, structural division, data on personnel activities (including dates of hiring, dismissal, transfers to other jobs);
- taxpayer identification number;
- signature;
- individual insurance account number (SNILS), information on salary and other personal data necessary to achieve the purpose of personal data processing, the collection (receipt) of which is carried out in the presence of and taking into account the conditions (legal grounds) for personal data processing.

➤ Personal data included in the category "Special categories of personal data": not processed.

➤ Personal data included in the category "Biometric personal data": not processed.

Personal data are processed on the grounds of the Tax Code of the Russian Federation; Federal Law of 06.12.2011 No. 402-FZ "On Accounting"; Civil Code of the Russian Federation, Agreement, Consent of the subject.

Personal data processing is carried out using automation tools or without the use of such tools.

The period of personal data processing is limited to achieving the stated purpose. The destruction of personal data is carried out within the time frames established by law upon expiration of the storage period or upon the arising of other legal grounds.

4.6 Ensuring the effectiveness of business communications

For the purpose of posting personal data in information sources (including directories, address books) of the Company, accessible exclusively on the Company's network (internal and external), to ensure effective information interaction and maintain business communication between the Company's Employees, and to carry out other actions arising from the stated purpose of processing personal data and/or aimed at realizing the legitimate interests of the Company, the following personal data of **Employees** are processed in the Company:

➤ Personal data included in the category "Other personal data":

- surname, name, patronymic, sex, date of birth, year of birth;
- information about work, including position, business unit, personnel number, contact information (phone number, email address);
- information about absence from work, information about achievements, identifiers in automated systems;
- location of the workplace;
- a link to social networks (if such information is posted by the personal data subject in the Company's internal communication channels),
- photo and other personal data necessary to achieve the purpose of personal data processing, the collection (receipt) of which is carried out in the presence of and taking into account the conditions (legal grounds) for personal data processing.

➤ Personal data included in the category "Special categories of personal data": not processed.

➤ Personal data included in the category "Biometric personal data": not processed.

Personal data are processed on the grounds of the Agreement and the Consent of the subject.

Personal data processing is carried out using automation tools or without the use of such tools.

The period of personal data processing is limited to achieving the stated purpose. The destruction of personal data is carried out within the time frames established by law upon expiration of the storage period or upon the arising of other legal grounds.

4.7 Organization of educational, pre-graduation, and industrial practice

To organize the provision of opportunities for students to undergo industrial, educational, pre-graduation practice, and to carry out other actions arising from the stated purpose of processing personal data and/or aimed at realizing the legitimate interests of the Company, the Company processes the personal data of **students**:

➤ Personal data included in the category "Other personal data":

- surname, name, patronymic, sex, date of birth, year of birth;
- contact details (phone number, email address),
- information about education, information about the educational institution, passport data and other personal data necessary to achieve the purpose of processing personal data, which is carried out in the presence of and taking into account the conditions (legal grounds) for processing personal data.

➤ Personal data included in the category "Special categories of personal data": not processed.

➤ Personal data included in the category "Biometric personal data": not processed.

Personal data are processed on the grounds of the Agreement and the Consent of the subject.

Personal data processing is carried out using automation tools or without the use of such tools.

The period of personal data processing is limited to achieving the stated purpose. The destruction of personal data is carried out within the time frames established by law upon expiration of the storage period or upon the arising of other legal grounds.

4.8 Organization of access to the territory and premises of the Company

For the purposes of processing applications for access to the Company's premises and issuing passes, performing actions necessary for holding corporate events (meetings, negotiations, etc.), including providing access to such events, fulfilling duties stipulated by the laws of the Russian Federation, and performing other actions arising from the stated purpose of processing personal data and/or aimed at implementing the legitimate interests of the Company, the Company processes personal data **of the Company's Employees, Employees of the Company's counterparties, candidates applying for vacant positions in the Company; individuals associated with the Company's Employees; representatives of government agencies, government institutions, state extra-budgetary funds, municipal authorities and other visitors** who require access to the Company's premises:

➤ Personal data included in the category "Other personal data":

- name, patronymic, surname;
- information about work (position, business unit, name of business unit);
- registration number of a personal vehicle and other personal data necessary to achieve the purpose of personal data processing, the collection (receipt) of which is carried out in the presence of and taking into account the conditions (legal grounds) for personal data processing.

➤ Personal data included in the category "Special categories of personal data": not processed.

- Personal data included in the category "Biometric personal data": not processed. Personal data are processed on the grounds of the Agreement and the Consent of the subject. Personal data processing is carried out using automation tools or without the use of such tools.

The period of personal data processing is limited to achieving the stated purpose.

The destruction of personal data is carried out within the time frames established by law upon expiration of the storage period or upon the arising of other legal grounds.

4.9 Implementation of corporate governance procedures

To ensure and control the implementation of corporate governance procedures, fulfillment of obligations to the Company's participants, performance of duties stipulated by the applicable laws of the Russian Federation, performance of other actions arising from the stated purpose of processing personal data and/or aimed at realizing the legitimate interests of the Company, the Company processes personal data **of the Participants in corporate governance procedures and their representatives:**

- Personal data included in the category "Other personal data":
 - surname, name, patronymic; year of birth, date of birth;
 - registration address;
 - data from identity documents (documents that, in accordance with applicable Russian laws, fall under the category of identity documents);
 - information about work (job title, business unit, name of the business unit) and other personal data necessary to achieve the purpose of personal data processing, the collection (receipt) of which is carried out in the presence of and taking into account the conditions (legal grounds) for personal data processing.

- Personal data included in the category "Special categories of personal data": not processed.

- Personal data included in the category "Biometric personal data": not processed.

Personal data are processed on the grounds of the Civil Code of the Russian Federation, Federal Law of 08.02.1998 N 14-FZ "On Limited Liability Companies".

Personal data processing is carried out using automation tools or without the use of such tools.

The period of personal data processing is limited to achieving the stated purpose. The destruction of personal data is carried out within the time frames established by law upon expiration of the storage period or upon the arising of other legal grounds.

5 PERSONAL DATA COLLECTION

5.1 The collection of personal data is carried out directly from the subject of personal data. If the provision of personal data and/or the receipt by the operator of consent to the processing of personal data are mandatory in accordance with the laws of the Russian Federation, the personal data subject shall be informed of the legal consequences of refusing to provide such data and/or consent to their processing.

5.2 Obtaining personal data from other persons is only possible if there are legal grounds. When receiving personal data from other persons, except in cases where the personal data is received within the framework of an order for the processing of personal data or when consent is obtained by the transferring party, it is necessary to notify the subject of this.

5.3 When collecting personal data, including through the Internet, the recording, systematization, accumulation, storage, clarification (updating, modification), and extraction of personal data of citizens of the Russian Federation are ensured using databases located on the territory of the Russian Federation.

5.4 The technological features of the Company's website require the collection of cookies, which are transient (temporary) in nature and are not aimed at collecting personal information exclusively about the personal data subject. The storage period of such files ranges from several minutes to several years, depending on the browser settings and the type of cookie files:

- **temporary cookies**, the storage period of which expires after the Internet browser is closed;
- **permanent cookies**, which, if necessary, can be deleted by the user from his computer;
- **mandatory cookies**, necessary for the functionality of the Company's website ;
- **functional cookie**, which allow to apply user settings to the site;
- **analytical cookies**, which allow the collection of information about the user's use of the website and improve the website.

Upon the first visit of the Company's website using a new browser or in the private browsing mode, the request for consent to the processing of cookies in accordance with the requirements of the law is carried out in the form of a banner. By clicking the "Accept" button or continuing to use the Company's website, the personal data subject agrees to the placement of cookies.

Third parties do not have access to the cookie files of the Company's website. Third-party organizations (e.g. Microsoft, Google, Yandex, etc.) that place their own cookies, including the browser of the personal data subject, have their own policies for the use of cookies.

6 PERSONAL DATA PROCESSING

6.1 When processing personal data, the Company carries out the following actions: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (dissemination, provision, access), blocking, deletion, destruction.

6.2 Personal data processing may be entrusted to a third party with the consent of the personal data subject or on the grounds provided for by the laws of the Russian Federation. A person processing personal data under instructions is not required to obtain the consent of the subject to the processing of personal data.

6.3 In case of confirmation of inaccuracy of personal data, such personal data is subject to updating within seven business days.

6.4 In the event that it is discovered that personal data have been processed illegally, such personal data shall be destroyed within three days.

7 PERSONAL DATA STORAGE

7.1 The storage of personal data is carried out in a form that allows the identification of the personal data subject no longer than required by the purposes of processing personal data, unless the storage period of personal data is established by the laws of the Russian Federation, or an agreement to which the personal data subject is a party.

7.2 Personal data storage is carried out taking into account the provision of their

confidentiality.

7.3 Personal data are transferred for archival storage in accordance with the laws of the Russian Federation on archival affairs, destroyed or depersonalized upon achievement of the processing purposes or in the event of loss of the need to achieve these purposes, unless otherwise provided by the laws of the Russian Federation or an agreement to which the personal data subject is a party.

8 PERSONAL DATA TRANSFER

8.1 The transfer of personal data to a third party is carried out only with the consent of the personal data subject or in cases expressly provided for by the laws of the Russian Federation.

8.2 The transfer of personal data to a government agency, a local government agency, a security and law enforcement agency, a state institution and fund, as well as another authorized body is permitted on the grounds stipulated by the laws of the Russian Federation.

8.3 Disclosure of personal data to a third party without the consent of the relevant subject is not permitted, except in cases where this is necessary to protect the life, health or other vital interests of the personal data subject.

8.4 Disclosure of personal data to a third party for commercial purposes without the consent of the relevant subject is prohibited. Personal data processing for the purpose of promoting goods, works, services on the market, as well as for the purposes of political campaigning, is carried out only with the prior consent of the subject.

8.5 Cross-border transfer of personal data on the territory of foreign states may be carried out for the purpose of concluding agreements with foreign organizations and fulfilling contractual obligations.

9 PERSONAL DATA DISSEMINATION

9.1 The processing of personal data permitted by the personal data subject for dissemination is carried out taking into account the fulfillment of the requirements stipulated by the laws of the Russian Federation on personal data.

9.2 The subject gives consent to the processing of personal data permitted for dissemination, separately from other consents of the personal data subject to the processing of his/her personal data.

9.3 If the subject autonomously discloses his/her personal data to an indefinite number of persons using the functionality of the Company's website or service without providing the appropriate consent, further dissemination by other operators of personal data is possible only on the basis of the consent of the relevant subject to the processing of personal data permitted for dissemination.

9.4 In consent to the processing of personal data permitted by the personal data subject for dissemination, the personal data subject has the right to establish prohibitions on the transfer (except for providing access) of such personal data by the operator to an unlimited number of persons, as well as prohibitions on the processing or conditions for the processing (except for obtaining access) of these personal data by an unlimited number of persons.

10 TERMS AND PROCEDURE FOR TERMINATION OF PERSONAL DATA PROCESSING

10.1 In the event that the purpose of processing personal data is achieved, the

processing of such personal data must be terminated, and the personal data must be destroyed within thirty days from the date of achieving the purpose of processing the personal data, unless otherwise provided by an agreement to which the personal data subject is a party, beneficiary or guarantor, or another agreement between the operator and the subject of personal data, or if the operator does not have the right to process personal data without the consent of the personal data subject on the grounds provided for by the laws of the Russian Federation.

10.2 In the event of the subject's withdrawal of consent to the processing of his personal data, the processing of such personal data must be terminated, and if the storage of personal data is no longer required for the purposes of personal data processing, such personal data are subject to destruction within thirty days from the date of receipt of the said withdrawal, unless otherwise provided by an agreement to which the personal data subject is a party, beneficiary or guarantor, or another agreement between the operator and the subject of personal data, or if the operator does not have the right to process personal data without the consent of the personal data subject on the grounds provided for by the laws of the Russian Federation.

10.3 In the event of detection of unlawful personal data processing, the processing of such personal data must be terminated within three business days. If it is impossible to ensure the legality of personal data processing, the personal data shall be destroyed within ten business days from the date of detection of unlawful processing.

10.4 If it is not possible to destroy personal data within the period specified in Clauses 10.1-10.3, such personal data shall be blocked and destroyed within a term not exceeding six months, unless another term is established by the laws of the Russian Federation.

11 ACCESS TO PERSONAL DATA

11.1 The following persons shall have the right to access personal data processed in the Company:

- The General Director of the Company;
- Employees of the Company for whom the processing of personal data is necessary in connection with the performance of their official duties;
- third parties processing personal data on behalf of the Company, on the basis of an agreement (instructions) concluded with this person.

11.2 The Company's employees access personal data in accordance with the list of officials approved by the General Director of the Company.

12 PROCEDURE FOR INTERACTION WITH PERSONAL DATA SUBJECTS

12.1 Any subject whose personal data are processed by the Company has the right to access his/her personal data, including the following information:

- confirmation of personal data processing;
- legal grounds and purposes of personal data processing;
- purposes and methods of personal data processing;
- name and location of the operator, information about persons (except for the operator's employees) who have access to personal data or to whom personal data may be disclosed on the basis of an agreement with the operator or on the basis of the laws of the Russian Federation;
- a list of processed personal data relating to the relevant subject and the source of their obtainment;
- terms of personal data processing and time frames for their storage;

- the procedure for the exercise by the subject of the rights provided for by the laws of the Russian Federation;
- information on the completed or intended cross-border transfer of data;
- name of the person processing personal data on behalf of the operator, if the processing is entrusted to a third party;
- information on the methods of fulfilling the operator's obligations established by Article 18.1 of Federal Law No. 152-FZ "On Personal Data".

12.2 The Company shall provide the information specified in Clause 12.1 within ten business days from the date of receipt of the request from the subject or his/her legal representative in the form in which the relevant request was received (unless otherwise specified in the request). The response to the request must not contain personal data relating to other personal data subjects, unless there are legal grounds for disclosing such personal data. The response period to a request may be extended, but by no more than five business days, if the operator sends a reasoned notice to the subject indicating the reasons for extending the period for providing the requested information.

12.3 The request of the subject or his/her representative shall contain:

- the number of the main identity document of the subject or his/her representative;
- information about the date of issue of the specified document and the issuing authority;
- information confirming the subject's participation in relations with the Company (agreement number, date of conclusion of the agreement or other information), or information otherwise confirming the fact of personal data processing by the Company;
- signature of the personal data subject or his/her representative.

12.4 The subject has the right to re-apply to the Company with a request for information specified in Clause 12.1 no earlier than thirty days after the initial contact or sending of the initial request.

12.5 The subject has the right to demand clarification of his/her personal data, their blocking or destruction if the personal data processed by the Company are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the purpose of processing declared by the Company.

12.6 The subject has the right to revoke his/her consent to the personal data processing, if such was given. The revocation of consent shall be sent by the subject to the Company and must contain the information specified in Clause 12.3. In the event of the subject's withdrawal of consent to the processing of personal data, the Company has the right to continue processing personal data without the consent of the subject if there are grounds provided for by the legislation of the Russian Federation or an agreement to which the personal data subject is a party, beneficiary or guarantor.

13 FULFILLMENT OF STATUTORY DUTIES

13.1 For the Company to fulfill its obligations stipulated by the laws of the Russian Federation on personal data, the following measures are taken:

- appointment of a person responsible for organizing personal data processing;
- issuance of documents defining the policy regarding personal data processing, internal documents on issues of personal data processing, as well as internal documents establishing procedures aimed at preventing and identifying violations of the laws of the Russian Federation and eliminating the consequences of such violations;
- taking of legal, organizational and technical measures to ensure the security of personal data;

- implementation of internal control over the compliance of personal processing with the requirements of the laws of the Russian Federation;
- assessment of the harm that may be caused to personal data subjects in the event of a violation of the laws of the Russian Federation;
- familiarization of the Company's employees with the provisions of the laws of the Russian Federation and internal documents of the Company.

13.2 In the event of detection of an unlawful or accidental transfer (provision, dissemination, access) of personal data, resulting in a violation of the rights of personal data subjects, the Company shall notify Roskomnadzor:

- within 24 hours from the moment of detection of the incident that occurred, the alleged reasons that led to the violation of the rights of personal data subjects, and the alleged harm caused to the rights of personal data subjects, the measures taken to eliminate the consequences of the relevant incident, including information about the person authorized to interact on issues related to the identified incident;
- within 72 hours from the moment of discovery of the results of the internal investigation of the incident, as well as of the persons whose actions caused the incident (if any).

14 PERSONAL DATA PROTECTION

14.1 When processing personal data, the necessary legal, organizational and technical measures shall be taken to protect personal data from unauthorized or accidental access to them, destruction, alteration, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions in relation to personal data.

14.2 To ensure the security of personal data, the Company carries out the following activities:

- determining threats to personal data security during their processing in information systems;
- implementing organizational and technical measures to ensure the security of personal data when processing them in information systems that ensure compliance with the requirements for the established levels of security;
- assessing the effectiveness of measures taken to ensure the security of personal data processed in the personal data information systems;
- registering personal data media;
- detecting unauthorized access to personal data and responding to such incidents;
- restoring personal data modified or destroyed due to unauthorized access;
- establishing rules for access to personal data processed in personal data information systems;
- registering and accounting of actions performed with personal data in personal data information systems;
- control over the measures taken to ensure the security of personal data in accordance with the established level of personal data protection.

15 LIABILITY

For violation of the requirements established by the laws of the Russian Federation, the Regulation on the processing and protection of personal data and other local acts of the Company, employees and other persons who have gained access to personal data bear disciplinary, administrative, civil and criminal liability in accordance with the Federal Laws of the Russian Federation.

16 FINAL PROVISIONS

16.1 All interested persons, including subjects of personal data and authorities exercising control and supervisory functions in the field of personal data, shall have unrestricted access to this Policy.

16.2 This Policy shall become effective upon its approval and shall remain in effect indefinitely. Amendments to the Policy shall be made by separate documents of the Company. The current version of the Policy, as well as notices of amendments to the Policy, are posted on the official website of the Company.

17 DETAILS AND CONTACT INFORMATION

Name: Limited Liability Company "UTG DOMODEDOVO"

Abbreviated name: LLC "UTG DOMODEDOVO"

Taxpayer Identification Number (INN): 7728894317

Tax Registration Reason Code (KPP): 772701001

Primary State Registration Number (OGRN): 5147746271569

Registered office: Room 38, 18th Floor, 2 Odesskaya Street, intra-city territory Zyuzino Municipal District, Moscow, 117638

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