

Personal Data Processing Policy

Please read this policy carefully. This policy contains general information about how personal data is processed using the <https://vipservice.ru> website, as well as subdomains and other online resources hosted in the vipservice.ru domain zone and administered by JSC Vipservice.

The website <https://vipservice.ru> is available in several languages. Regardless of the selected language version of the website, personal data is processed by JSC Vipservice in accordance with this Policy.

You are a user of the website <https://vipservice.ru>. By continuing to use this website, you consent to the processing of your personal data under the terms and conditions set forth in this policy. If you do not agree, do not use this website.

1. General Provisions

1.1. This Personal Data Processing Policy has been adopted by Vipservice Joint-Stock Company in accordance with paragraph 2, part 1, article 18.1 of Federal Law No. 152-FZ of July 27, 2006, "On Personal Data." The purpose of this Policy is to define the fundamental terms of processing and protecting personal data using the website <https://vipservice.ru>, as well as to communicate them to all personal data subjects.

1.2. In this Policy, the following terms are used with regard to the processing of personal data (with a capital or lowercase letter):

"Updating" means actions to clarify, update, and amend personal data, aimed at ensuring the relevance of personal data in relation to the purposes of their processing.

"Blocking" is a temporary cessation of the processing of personal data (except in cases where processing is necessary to clarify personal data).

"User Data" — personal data of Users processed using the website.

"Employee Data" — personal data of Employees processed using the website.

“Data” — personal data of Users processed using the website.

“Law” — Federal Law No. 152-FZ of July 27, 2006 “On Personal Data” in its current version.

“Information system” is a set of personal data contained in databases and the information technologies and technical means that ensure their processing.

“Company” — Joint-Stock Company “Vipservice”, a legal entity under the laws of the Russian Federation, OGRN 1027700215840, INN 7731205077, which is the administrator of the site.

“Data Confidentiality” is a mandatory requirement for a person who has access to Data not to transfer such information to third parties without the consent of its owner.

“Depersonalization” is an action that makes it impossible to determine the ownership of personal data by a specific personal data subject without the use of additional information.

“Processing” means any action (operation) or set of actions (operations) performed with or without the use of automated means with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), depersonalization, blocking, deletion, destruction of personal data.

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

“Personal Data Processor” — a Company employee appointed as the Person Responsible for organizing the processing of personal data in the Company.

“Personal data” means any information relating to a directly or indirectly identified or identifiable natural person (subject of personal data).

“Policy” — this Policy regarding the processing of personal data.

“Users” are individuals (subjects of personal data) who visit the website and use its functionality.

“Provision” — actions aimed at disclosing personal data to a specific person or a specific group of persons.

Roskomnadzor is the authorized body for the protection of the rights of personal data subjects.

"Website" — a website on the Internet accessible via the domain name vipservice.ru, as well as all subdomains and other Internet resources located in the vipservice.ru domain zone and administered by JSC "Vipservice".

"Collection" is the purposeful process of obtaining personal data from a personal data subject.

“Personal data subject” is the individual to whom the personal data relates.

“Cross-border transfer” is the transfer of personal data to the territory of a foreign state to a foreign operator.

“Destruction” — actions that make it impossible to restore the contents of personal data in an information system and/or that result in the destruction of tangible media containing personal data.

“Storage” is a process that involves keeping personal data in a systematized form at the disposal of the Company.

1.3. The Company is the Data Controller. The Company's Data Processing Policy states that Data shall be processed only in cases and according to the procedure established by applicable law. Furthermore, respecting and protecting the rights and legitimate interests of personal data subjects is the Company's top priority. Data shall be processed solely on a lawful and fair basis.

1.4. This Policy does not apply to cases of personal data processing outside the Website. Such processing is governed by the Company's internal regulations.

1.5. The Website may contain links to other web resources owned by the Company or other parties. This Policy does not apply to such web resources. Users who follow links to other websites are advised to familiarize themselves with the personal data processing policies posted on such websites.

1.6. This Policy does not apply to software, payment services, personal accounts, and other information systems of the Company, for which separate documents governing the processing of personal data may apply.

1.7. The user has the following basic rights as a personal data subject:

- the right to receive information regarding the processing of User Data;
- the right to request clarification of the User's Data, its blocking or destruction if it is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing;
- the right to appeal the actions (inaction) of the Company to government authorities, including in court;
- the right to protection of rights and legitimate interests, including compensation for losses and (or) compensation for moral damages in court or in accordance with another procedure provided for by applicable legislation; other rights established by applicable legislation.

1.8. If the User wishes to provide their personal data for processing by the Company, they are obligated to ensure that it is up-to-date and accurate. The User is obligated to refrain from providing the Company with data relating to other individuals. The Company always assumes that the User is acting on their own behalf.

1.9. The Company has the right to process Data only in cases where it is necessary to achieve the purposes and in compliance with other conditions established by the Law.

1.10. The Company has the following main responsibilities:

- when collecting Data, the Company is obliged to provide the subject of personal data, at his request, with the information provided for in Part 7 of Article 14 of the Law;
- if the provision of Data is mandatory in accordance with the law, the Company is obliged to explain to the personal data subject the legal consequences of refusing to provide his Data;
- The Company is obliged to take measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Law and regulatory legal acts adopted in accordance with it;
- The Company is obliged to publish this Policy on the Internet, information about the implemented requirements for the protection of personal data,

and also to ensure the possibility of access to this document using the Internet;

- When processing Data, the Company is obliged to take the necessary legal, organizational and technical measures or ensure their adoption to protect the Data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of Data, as well as from other illegal actions in relation to the Data;
- The Company is obliged to respond to requests from personal data subjects and inquiries from Roskomnadzor and provide them with information regarding the processing of Data in accordance with the procedure established by Law;
- The Company is obliged to eliminate violations of the law committed during the processing of Data, clarify, block and destroy Data (or ensure that these actions are carried out by a person acting on behalf of the Company);
- The Company is obliged to notify Roskomnadzor of its intention to process personal data before commencing the processing of personal data, except in cases established by law;
- The Company is obliged to appoint a Person Responsible for the processing of personal data;
- The Company bears other obligations provided by law in connection with the processing of Data.

2. Purposes of collecting User Data

2.1. Data processing must be limited to achieving specific, predetermined, and legitimate purposes. Data processing that is incompatible with the purposes for which personal data was collected is prohibited.

2.2. The Company processes User Data using the website for the following purposes:

- business communication with Users;
- processing requests related to the organization of business trips, events and other services of the Company;
- informing about the Company's services and their advertising;

- additional purposes may be specified in the User's consent to the processing of his/her Data, posted on the website in a clear form (for example, in a web form designed to collect Data).

3. Legal basis for data processing

3.1. The legal basis for the processing of personal data is the set of legal acts, pursuant to which and in accordance with which the operator processes personal data.

3.2. The legal grounds for processing Data using the website are specified in paragraphs 4.3 and 4.4 of this Policy.

4. Volume and categories of processed Data, categories of Data subjects

4.1. The content and volume of processed Data must correspond to the stated purposes of processing. Processed Data must not be excessive in relation to the stated purposes of processing.

4.2. The website does not process special categories of personal data (e.g. information about race, nationality, political views, religious or philosophical beliefs, health status), or biometric personal data.

4.3. The table below provides information on the main categories, volume of processed User Data and their compliance with the purposes, legal grounds and processing periods.

User Data Categories	Purposes of processing	Legal basis	Processing times
- Last name, first name, patronymic; - contact information (phone, email address); - information about the company; - information about business trips;	Business communication with Users	Consent to processing personal data (provided for in subparagraph 1 of part 1 of Article 6 of the Law)	Until the end correspondence with the User

- information about events; - other information voluntarily indicated by the User in the request form.			
- Last name, first name, patronymic; - contact information (phone, email address); - information about the company; - information about business trips; - information about events; - other information voluntarily indicated by the User in the request form.	Processing requests related to the organization of business trips, events and other Company services	Consent to the processing of personal data (provided for in subparagraph 1 of part 1 of Article 6 of the Law)	Until the completion of processing of the relevant User request
- Last name, first name, patronymic; - contact information (phone, email address); - information about the company; - information about business trips; - information about events; - other information voluntarily indicated by the User in the request form.	Informing about the Company's services and their advertising	Consent to the processing of personal data (provided for in subparagraph 1 of part 1 of Article 6 of the Law)	Before the User's consent is revoked

Other categories of Data may be processed through the use of the website. In such cases, the User is explicitly informed of the collection of Data (e.g., by including the appropriate field in a web form), consents to such

collection, and all terms of this Policy apply without limitation.

5. Procedure and conditions for processing Data

5.1. For all of the above processing purposes, the Company processes Data using automated means (including computers) and without the use of automated means (including paper-based data). The Company may perform the following actions (operations) and/or a set of actions (operations) with the Data:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- clarification (update, change);
- extraction;
- usage;
- transfer (provision, access);
- distribution (in terms of Employee Data)
- depersonalization;
- blocking;
- removal;
- destruction of Data.

5.2. When collecting User Data using web forms, the Company always takes the following into account:

- all Data belongs personally to the User who filled out the web form;
- The user followed the instructions for filling out the web form, including entering information into the sections specifically designated for them;
- The user is legally competent and of legal age;

- The User has provided accurate and current Data.

5.3. Business communication with Users is carried out through web forms located on the website, in which the User provides their personal data and other information necessary to process requests related to the Company's services, business trips, events, and other inquiries. The Company considers the correspondence to be complete when it sends the User a final message that does not require a further response from the User. If the User wishes to resume the correspondence after the end of the conversation and writes to the Company again, the Company reserves the right to request their personal data again.

5.4. Information about the Company's services and their advertising is provided by communicating information (including advertising) to Users using the contact information provided by the User. These actions may be performed on a one-time basis or periodically, at the User's discretion.

5.5. Users' data is processed until the purpose of its processing is achieved (clause 4.4 of the Policy) or until the User revokes consent to the processing of his/her personal data, unless there are other legally established grounds for continuing processing.

5.6. The procedure and conditions for processing Employee Data are determined by the legislation of the Russian Federation and local regulations of the Company.

5.7. The Company may entrust the processing of Data to third parties by concluding a personal data processing agreement with them. Subject to the conditions established by law, the Company also has the right to transfer Data to third parties for further independent processing. Third parties are obligated to comply with the data protection requirements.

5.8. The Company transfers data processed from analytics services (Google Analytics) across borders. You can find information on how to opt out of this transfer in the "Web Analytics and Cookie Policy."

5.9. The Company transfers Data or provides access to it to inquiry and investigative bodies, courts, law enforcement, supervisory agencies, and other authorized government bodies and officials if there are grounds provided for by applicable law.

5.10. The Company considers the Data to be strictly confidential. The Company and other persons who have access to the Data will not disclose or

distribute the Data to third parties without the consent of the relevant personal data subject, unless otherwise provided by federal law. The Company will not disclose personal data collected through the Website, except in cases where the personal data subject specifically requests (in writing) that the information about them be made publicly available.

5.11. Information on the implemented requirements for data protection is provided in Appendix No. 1 to the Policy.

5.12. The Company shall take or ensure the necessary legal, organizational, and technical measures to protect Data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, or distribution of Data, as well as from other illegal actions in relation to Data. Data security is ensured, in particular:

- identification of threats to the security of Data when processing it in personal data information systems;
- the application of organizational and technical measures to ensure the security of Data when processed in personal data information systems, necessary to meet the requirements for the protection of Data, the implementation of which ensures the levels of protection of personal data established by the Government of the Russian Federation;
- the use of information security tools that have undergone the established procedure for assessing the conformity of information;
- assessment of the effectiveness of measures taken to ensure the security of Data before the commissioning of the personal data information system;
- taking into account machine-readable media of Data;
- detection of facts of unauthorized access to Data and taking measures;
- restoration of Data modified or destroyed due to unauthorized access to it;
- establishing rules for access to Data processed in the personal data information system, as well as ensuring the registration and accounting of all actions performed with Data in the personal data information system;
- control over the measures taken to ensure the security of Data and the level of protection of personal data information systems.

5.13. The condition for termination of the processing of Data may be the achievement of the purposes of processing the Data, the expiration of the consent or the revocation of the consent of the personal data subject to the

processing of his Data, as well as the detection of unlawful processing of Data.

5.14. Data is stored in a form that allows the identification of the personal data subject for no longer than is required by the purposes of processing the Data, except in cases where the Data storage period is not established by federal law, an agreement to which the personal data subject is a party, beneficiary, or guarantor.

5.15. When collecting Data, the Company is obliged to ensure the recording, systematization, accumulation, storage, clarification (updating, modification), and extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except in cases established by Law.

5.16. The Company pays due attention to the handling and protection of personal data in its daily operations. The Company ensures data storage conditions that prevent unauthorized or accidental access by implementing physical data security measures and conducting appropriate organizational measures. The Company allows only employees with appropriate job responsibilities to handle personal data, provided that access rights are properly established and they have been properly briefed.

5.17. The Website User may revoke their consent to the processing of Data at any time by sending an electronic or written message in free form to the addresses specified in paragraph 8.14 of this Policy.

6. Updating, correcting, deleting and destroying Data, responding to requests from personal data subjects for access to Data

6.1. In the event that the inaccuracy of the Data or the illegality of its processing is confirmed, the Data shall be updated by the Company, and the processing shall be terminated accordingly.

6.2. Upon achieving the purposes of processing the Data, as well as in the event of the personal data subject's withdrawal of consent to their processing, the Data shall be subject to destruction if:

- unless otherwise provided by an agreement to which the subject of personal data is a party, beneficiary or guarantor;
- The Company does not have the right to process personal data without the consent of the subject on the grounds provided for by the Law or other federal laws;

- unless otherwise provided by another agreement between the Company and the personal data subject.

6.3. The Company is obliged to inform the subject of personal data or his representative of information about the processing of personal data of such subject carried out by him upon the latter's request.

7. Processing statistical data on website visits and use

7.1. The Company may use web analytics services on the website, as well as cookies and other similar technologies, in accordance with the Web Analytics and Cookies Policy.

8. Regulations for responding to requests/appeals from personal data subjects and their representatives, authorized bodies regarding the inaccuracy of personal data, the illegality of their processing, revocation of consent and access of the personal data subject to their data

8.1. Users, as subjects of personal data, have the right to receive information regarding the processing of their Data, including:

- confirmation of the fact of processing of Data by the Company;
- legal grounds and purposes of data processing;
- methods of data processing used by the Company;
- the name and location of the Company, information about persons who have access to the Data or to whom the Data may be disclosed on the basis of an agreement with the Company or on the basis of federal law;
- processed Data related to the relevant personal data subject, the source of their receipt, unless another procedure for submitting such data is provided for by federal law;
- the terms of processing the Data, including the terms of its storage;
- the procedure for the exercise by the subject of personal data of the rights provided for by the legislation of the Russian Federation in the field of personal data;
- information on the completed or intended cross-border transfer of Data;

- the name of the organization or the last name, first name, patronymic and address of the person processing the Data on behalf of the Company, if the processing is or will be entrusted to such an organization or person;
- other information provided for by the legislation of the Russian Federation in the field of personal data.

To obtain this information, Users have the right to contact the Company using the contact information specified in paragraph 8.14 below.

8.2. Personal data subjects have the right to request that the Company clarify their Data, block it, or destroy it if the Data is incomplete, outdated, inaccurate, illegally obtained, or is not necessary for the stated purpose of processing, and to take measures provided by law to protect their rights.

8.3. The above information must be provided to the personal data subject by the Company in an accessible form, and it must not contain Data related to other personal data subjects, unless there are legal grounds for disclosure of such Data.

8.4. The information specified in this section is communicated to the personal data subject or his representative, and they are also given the opportunity to familiarize themselves with the relevant Data upon request or within 30 days from the date of receipt of the request from the personal data subject or his representative.

The request must contain:

- the number of the main document certifying the identity of the personal data subject or his representative, information on the date of issue of the specified document and the authority that issued it;
- information confirming the personal data subject's participation in legal relations with the Company, or information otherwise confirming the processing of personal data by the Company, and the signature of the personal data subject or their representative. The request may be submitted in the form of an electronic document and signed with an electronic signature in accordance with Russian legislation.

8.5. If the information specified in this section, as well as the processed Data, were provided for review to the personal data subject at his request, the personal data subject has the right to re-apply to the Company or send a repeat request in order to receive the specified information and review such Data no earlier than thirty days after the initial request or sending of the

initial request, unless a shorter period is established by federal law, a regulatory legal act adopted in accordance with it, or an agreement to which the personal data subject is a party, beneficiary, or guarantor.

8.6. The personal data subject has the right to reapply to the Company or submit a follow-up request to obtain the above information, as well as to review the processed Data, before the expiration of the period specified in the previous paragraph, if such information and/or the processed Data were not provided to them for review in full following the review of the initial request. The follow-up request must include a justification for the follow-up request.

8.7. The Company reserves the right to refuse a personal data subject's repeated request if it does not meet the conditions established by law. Such refusal must be reasoned.

8.8. The right of the personal data subject to access his/her Data may be limited in accordance with federal laws, including if the personal data subject's access to his/her Data violates the rights and legitimate interests of third parties.

8.9. The Company shall notify Roskomnadzor, at the request of this body, of the necessary information within thirty days from the date of receipt of such request.

8.10. All incoming requests and inquiries are registered as incoming correspondence and are also recorded in the relevant registers of the Company.

8.11. Requests and inquiries are reviewed by the Person Responsible for Personal Data Processing. If questions arise or the content of the request needs clarification, the Person Responsible for Personal Data Processing will contact the person who submitted the request/inquiry using the contact information provided in it.

8.12. The response to a request/appeal is drawn up in the same form in which the corresponding request/appeal was received (for example, by email or in writing), unless otherwise expressly established by the legislation of the Russian Federation or another request is not contained in the request/appeal.

8.13. A response to a personal data subject's request may be signed by the Person Responsible for Personal Data Processing or the Company's CEO. A response to a Roskomnadzor request is signed by the Company's CEO or a

person acting on their behalf under a power of attorney issued on behalf of the Company.

8.14. The Company strives to ensure the most prompt and effective interaction with personal data subjects in order to prevent violations of their rights and legitimate interests. Requests/inquiries should be sent to the following address:

JSC "Vipservice"

Postal address: 123308, Moscow, inner territory of the Khoroshevo-Mnevniki Municipal District, 2nd Silikatny Prospekt, 14

Email: dpo@vipservice.ru

Phone: +7 (495) 626-48-88

Working hours: Monday through Friday from 9:00 a.m. to 7:00 p.m., except public holidays in Russia.

Requests are accepted in free form, except in cases where the form and/or content of the request is determined by applicable law or this Policy.

Appendix. Information on the implemented requirements for the protection of personal data

1. The Company is constantly improving its personal data protection system and takes all necessary organizational, legal, and technical measures to this end, and also takes into account existing international standards.

2. As necessary and taking into account the threats relevant to the information systems that ensure the functioning of the Internet site and the processing of personal data, the Company implements the following requirements for the protection of personal data or ensures their implementation by persons engaged in data processing:

- organizes a security regime for the premises in which information systems are located that process personal data collected through the website, preventing the possibility of uncontrolled entry or presence in these premises of persons who do not have the right of access to these premises;
- ensures the safety of personal data carriers;
- approves the list of persons who have access to personal data in the context of performing their work duties;

- uses information security tools that have undergone the procedure for assessing compliance with the requirements of applicable legislation in the field of information security, in cases where the use of such tools is necessary to neutralize current threats;
- appointed an employee (or structural unit) responsible for organizing the processing of personal data;
- ensures automatic registration in the electronic security log of changes in access rights to personal data;
- provides access to the contents of the electronic message log exclusively to employees or authorized persons who need the information contained in the said log to perform their work duties;
- implements other requirements.