

## Personal Data Processing Policy

### 1. General provisions

1.1. The Regulation on working with personal data of clients, contractors and users of the website of Interizgroup LLC (hereinafter referred to as the Regulation) has been developed in accordance with the Constitution, Federal Law No. 152-FZ of 27.07.2006, Federal Law No. 519-FZ of 30.12.2020 and other regulatory legal acts in force in Russia.

1.2. The policy applies to all personal data processed by Interizgroup Limited Liability Company (Interizgroup LLC), OGRN: 1227700317437, TIN: 9709081581, (hereinafter referred to as the Operator), including personal data of users registered on the site: <https://www.interisegroup.com/> (hereinafter referred to as the Site), individuals users who access the site, as well as contact the Operator using possible communication methods.

1.3. This Regulation defines the procedure for collecting, recording, processing, accumulating, using, distributing and storing personal data of personal data subjects and guarantees the confidentiality of information about individuals:

clients and (or) representatives of client companies, counterparties and (or) representatives of counterparty companies and users of the website of Interizgroup LLC, who provided the Company with the following information:

Interizgroup provides its own personal data.

This agreement also applies to the websites of partner companies. In this case, the Operator monitors compliance with appropriate security measures.

1.4. The Policy applies to relations in the field of personal data processing that have arisen with the Operator both before and after the approval of this Policy.

1.5. In compliance with the requirements of Part 2 of Article 18.1 of the Law on Personal Data, this Policy is published in the information and telecommunications network on the Internet on the Operator's website at the following network address: <https://www.interisegroup.com/policy> and it is a publicly available document.

1.6. The purpose of this Regulation is to protect the personal data of customers, contractors and users of the website of Interizgroup LLC from unauthorized access and disclosure. The personal data of the above-mentioned persons is confidential, strictly protected information.

### 1.7. Concepts:

**Personal data** – any information related directly or indirectly to a specific or identifiable individual (hereinafter referred to as the Personal Data Subject), including information received from visitors and users (hereinafter referred to as the User) during the use of the Site. **Personal data operator (Operator)** – an individual or legal entity that independently or jointly with other persons organizes and / or performs the processing of personal data, as well as determines the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data;

**Processing of personal data** – any action (operation) or a set of actions (operations) with personal data performed with or without the use of automation tools. The processing of personal data includes, but is not limited to:

- collection;
- recording;
- systematization.
- accumulation;

- storage;
- clarification (update, change).
- extract;
- usage;
- transmission (distribution, provision, access);
- depersonalization.
- blocking;
- delete it.
- destruction.

**Automated processing of personal data** – processing of personal data using computer equipment and computer programs;

**Dissemination of personal data** – actions aimed at disclosing personal data to an indefinite group of persons;

**Provision of personal data** – actions aimed at disclosing personal data to a certain person or a certain group of persons;

**Blocking of personal data** – temporary termination of the processing of personal data (except in cases where the processing is necessary to clarify personal data); **Destruction of personal data** – actions that make it 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 that make it impossible to determine whether personal data belongs to a specific Personal Data Subject without using additional information;

**Personal data information system** – a set of personal data contained in databases and information technologies and technical means that ensure their processing;

**Material carrier of personal data (Material carrier)** – paper, electronic, machine and other information carriers used for reproduction (including copying, downloading, saving, recording) and/or storage of information containing personal data, processed in automated and non-automated form. **Destruction of personal data** – actions that make it impossible to restore the content of personal data in the personal data database and/or as a result of which the Material Carriers of personal data are destroyed.

**Cross-border transfer of personal data** – transfer of personal data on the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

The terms used in this Policy are given in the text of section 1 of this Policy. In the absence of the term used in section 1 of this Policy, the interpretation and application of the term, if necessary, is carried out in accordance with the provisions of applicable regulatory legal acts of the Russian Federation.

When using a certain term in the text of this Policy that is identical to that specified in section 1 of this Policy, but written with a small letter ("personal data",

"processing of personal data" and others), this term is given the corresponding meaning specified in section 1 of this Policy.

## **2. Purposes of personal data processing**

- 2.1. The processing of personal data of Personal Data Subjects is carried out by the Operator for pre-defined purposes:
- 2.1.1. Advising the User on the provision of services, maintaining links between the Operator and the User;
  - 2.1.2. Conclusion, execution and termination of contracts with the Subject, including provision of services to the Subject;
  - 2.1.3. Processing requests and requests from the User.  
Providing User access to services, information and / or materials contained on the site (including subdomains): <https://www.interisegroup.com>
  - 2.1.4. Providing and collecting feedback;
  - 2.1.5. The Operator organizes promotions, surveys, interviews, tests, and research on the Site.
  - 2.1.6. Fulfillment of obligations stipulated by the legislation of the Russian Federation;
  - 2.1.7. Settlement of disputes that have arisen between the Subject and the Operator, both judicial and non-judicial, including the transfer of personal data to third parties for the purpose of providing legal services to the Operator;
  - 2.1.8. Performing advertising activities with the User's consent, including providing the User with information about new services.
  - 2.1.9. Providing technical support for the use of the Site.
- 2.2. For each purpose of personal data processing, the following methods of personal data processing are provided: automated processing of personal data (using computer technology) and non-automated processing of personal data with recording of personal data on Tangible Media.
- 2.2.1. The processing of personal data by the Operator in these ways is carried out in compliance with the requirements of the legislation of the Russian Federation regulating the processing and protection of personal data.
  - 2.2.2. When processing personal data in an automated manner, Interizgroup LLC takes the necessary measures to ensure the security of the processed personal data.
  - 2.2.3. Processing of personal data in a non-automated manner, including storage of Tangible Personal Data carriers, is carried out in premises that ensure their safety, with the ability to determine the places of storage of personal data (Tangible Media) in accordance with the procedure provided for by the legislation of the Russian Federation.
- 2.3. Processing of personal data that is incompatible with the purposes of personal data collection is not allowed.

### **3. Legal grounds for processing personal data**

- 3.1. The legal basis for the processing of personal data is a set of regulatory legal acts in compliance with which and in accordance with which the Operator processes personal data, including:
- The Constitution of the Russian Federation;
  - The Civil Code of the Russian Federation;
  - The Tax Code of the Russian Federation;
  - other regulatory legal acts regulating relations related to the Operator's activities.
- 3.2. Personal data necessary for the Operator to fulfill the contract concluded with the Subject (including the provision of educational services, providing the Subject with access to training materials).

materials, etc.), are processed by the Operator on the appropriate basis provided for in clause 5, Part 1, Article 6 of the Federal Law "On Personal Data".

3.3. In other cases, the Operator processes personal data with the consent of the Subject.

3.4. Consent is granted at the time when the Subject performs actions expressing consent.

3.5. The moment when the Consent is accepted is when the Subject puts a mark in the box (check box) "I give my consent to the processing of my personal data" on the Site.

Consent is also considered to be the Subject's performance of other actions that express the Subject's will to grant consent (for example, the Subject's independent leaving of data and in other cases).

3.6. By consenting to the processing of personal data, the Subject:

3.6.1. Expresses consent to the processing of personal data without reservations and restrictions;

3.6.2. Confirms that all the data provided by him is accurate and belongs to him personally;

3.6.3. Agrees to receive information materials from the Operator in the form of SMS messages, by e-mail (e-mail), by phone number specified by the Operator via the web form on the Operator's Website;

3.6.4. Confirms that by giving Consent, he acts freely, of his own free will and in his own interest.

3.7. The subject provides consent to the processing of personal data, both without the use of automation tools, and with their use.

#### **4. Scope and categories of personal data processed, categories of personal data subjects**

4.1. The content and scope of the personal data processed must correspond to the stated purposes of processing provided for in sec. 2 of this Policy.

4.2. The Operator may process personal data of the following categories of personal data subjects:

4.2.1. Site Users:

- last name, first name, patronymic;
- contact information, including your email address and phone numbers.
- other personal data provided by Users that is necessary for the conclusion and execution of contracts.

4.2.2. Customers and counterparties of the Operator (individuals):

- last name, first name, patronymic;
- date and place of birth.
- passport data;
- address of registration at the place of residence;
- contact information, including your email address and phone numbers.
- individual taxpayer number;
- current account number.
- other personal data provided by clients and contractors (individuals) that is necessary for the conclusion and execution of contracts.

4.2.3. Representatives of the Operator's counterparties (legal entities):

- last name, first name, patronymic;
- passport data;
- contact information, including your email address and phone numbers.
- current position;

- other personal data provided by representatives of counterparties that are necessary for the conclusion and execution of contracts.

4.3. The Operator does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, health status, except in cases provided for by the legislation of the Russian Federation, as well as biometric data of the User.

4.4. The Subject's device automatically transmits technical data: information stored in cookies, information about the browser and its settings, date and time of access to the site, addresses of requested pages, actions on the site or in the application, technical characteristics of the device, IP address, etc.

4.5. Disabling cookies may result in the inability to access parts of the Operator's Website that require authorization.

4.6. The operator can collect statistics about the IP addresses of its users.

This information is used to identify and solve technical problems, to control the legality of financial payments made, and to make it easier to leave requests on the Operator's Website.

## **5. Transfer of personal data to third parties**

5.1. The Operator may transfer personal data or entrust their processing to third parties.

5.2. The Operator has the right to transfer personal data of the Subject to partners involved in the provision of services, as well as to state bodies if there is an obligation in accordance with the law, including banks when making payments and using banking services, and companies that provide them.

5.3. The transfer of personal data to third parties specified in clause 5.2. of this Policy is subject to the following conditions:

- A third party processes personal data using databases located on the territory of the Russian Federation.
- A third party ensures the confidentiality of personal data during their processing and use;
- it undertakes not to disclose or distribute Users' personal data to other persons without their consent.

5.4. The Operator does not transfer personal data across borders.

## **6. Dissemination of personal data**

6.1. The Operator has the right to transfer (by means of distribution to an unlimited number of persons) personal data in the following cases:

- The user himself has allowed the free distribution of categories of personal data to an unlimited number of persons.

## **7. Basic rights and obligations**

7.1. The Operator has the right to:

7.1.1. Independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Law on Personal Data and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Law on Personal Data or other federal laws;

7.1.2. Assign the processing of personal data to another person with the consent of the Personal Data Subject, unless otherwise provided by federal law, on the basis of a contract concluded with this person.

A person who processes personal data on behalf of the Operator is obliged to comply with the principles and rules for processing personal data provided for in the Personal Data Law;

7.1.3. If the Personal Data Subject withdraws consent to the processing of personal data, the Operator has the right to continue processing personal data without the consent of the Personal Data Subject, if there are grounds specified in the Personal Data Law.

7.2. The Operator must:

7.2.1. Organize the processing of personal data in accordance with the requirements of the Law on Personal Data;

7.2.2. Respond to requests and requests from Personal data Subjects and their legal representatives in accordance with the requirements of the Personal Data Law;

7.2.3. Report to the authorized body for the protection of the rights of Personal data Subjects (Federal Service for Supervision of Communications, Information Technologies and Mass Communications (Roskomnadzor)) at the request of this body, the necessary information is provided within 30 (thirty) days from the date of receipt of such request.

7.3. The personal data subject has the right to:

7.3.1. Receive information related to the processing of their personal data, with the exception of cases stipulated by federal laws. Information is provided to the Personal Data Subject by the Operator in an accessible form, and it should not contain personal data related to other Personal Data Subjects, except in cases where there are legal grounds for disclosure of such personal data. The list of information and the procedure for obtaining it is established by the Law on Personal Data;

7.3.2. Require the Operator to clarify their personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as take measures provided for by law to protect their rights;

7.3.3. Set a condition for prior consent when processing personal data for the purpose of promoting goods, works and services on the market;

7.3.4. Appeal to Roskomnadzor or in court against illegal actions or omissions of the Operator when processing their personal data.

7.4. Control over the implementation of the requirements of this Policy is carried out by an authorized person responsible for organizing the processing of personal data by the Operator.

7.5. Liability for violation of the requirements of the legislation of the Russian Federation in the field of personal data processing and protection is determined in accordance with the legislation of the Russian Federation.

7.6. This Policy applies to all information that the Operator can obtain about Site visitors.

## **8. Safety**

8.1. To protect personal data, the Operator takes the necessary legal, organizational and technical measures:

8.1.1. This Personal Data Processing Policy has been issued, and local acts on personal data processing and protection have been approved;

8.1.2. The Operator's processes and documents are regularly checked for compliance with the law.

8.1.3. Create the necessary conditions for working with personal data;

8.1.4. Records of documents containing personal data are organized.

8.1.5. Work with information systems that process personal data is organized;

8.1.6. Personal data is stored under conditions that ensure their safety and prevent unauthorized access to them;

8.1.7. Assessment of the risk and harm that may be caused in case of violation of the legislation on personal data is made;

8.1.8. Effective data protection measures are applied to neutralize cyber threats.

8.1.9. Performs operation of authorized software and / or its components, as well as provides control over its installation and updating;

8.1.10. Access to personal data is not granted to unauthorized persons;

8.1.11. Legal, organizational and technical measures are applied to ensure the security of personal data.

8.2. If the Operator, Roskomnadzor or any other interested party identifies the fact of illegal or accidental transfer (provision, distribution) of personal data (access to personal data), which resulted in a violation of the rights of personal data subjects, the Operator:

- within 24 hours – notifies Roskomnadzor of the incident that occurred, the alleged causes that led to the violation of the rights of Personal Data Subjects, the alleged harm caused to the rights of Personal Data Subjects, and the measures taken to eliminate the consequences of the incident, as well as provides information about the person authorized by the Operator to interact with Roskomnadzor on issues related to the incident;

- within 72 hours – notifies Roskomnadzor of the results of an internal investigation of the identified incident and provides information about the persons whose actions caused it (if any).

8.3. The security and protection of User information also depends on the User. The Operator strongly recommends making sure that the User's device is properly protected, including with a password, security technologies, and is under the User's control.

## **9. Storage of personal data**

9.1. The Operator records, systematizes, accumulates, stores, clarifies (updates, changes) personal data of Subjects using databases located on the territory of Russia.

9.2. Data processing centers located on the territory of Moscow are used for data storage.

9.3. The Operator stores data in accordance with the data processing periods necessary to achieve the processing objectives specified in section 2 of this Policy.

## **10. Terms of personal data processing**

10.1. The terms of processing, including storage of personal data for each purpose of personal data processing, are established taking into account compliance with the requirements, including the conditions for processing personal data, defined by the legislation of the Russian Federation, and/or taking into account the provisions of the contract, the party to which the Personal Data Subject acts, and/or the consent of the Personal Data Subject to personal data.

10.2. The Operator terminates the processing of personal data within the time limits established by law:

10.2.1. When the processing objectives specified in section 3 of this Policy are achieved, or when it is no longer necessary to achieve them (if there are no other grounds for processing provided for by law).

10.2.2. Upon expiration of the consent period or upon withdrawal of consent (if there are no other grounds for processing provided for by law).

10.2.3. If illegal processing is detected, if it is impossible to ensure its legality.

10.2.4. When the Operator is liquidated as a legal entity.

## **11. Revocation of consent to the processing of personal data**

11.1. To withdraw your consent to the processing of personal data or to receive information on personal data issues, please contact the Operator via email: [request@interisegroup.com](mailto:request@interisegroup.com) or by sending a written review to the address: 109316, Moscow, Volgogradsky ave., 1 building 1, sq. 47

11.2. The deadline for responding to a request to delete the Subject's personal data is 10 (ten) days.

## **12. Updating, correcting, deleting and destroying personal data, responding to requests from subjects for access to personal data**

12.1. Confirmation of the fact of personal data processing by the Operator, legal grounds and purposes of personal data processing, as well as other information specified in Part 7 of Article 14 of the Personal Data Law, are provided by the Operator to the Personal Data Subject or his representative when applying or receiving a request from the Personal Data Subject or his representative.

The information provided does not include personal data related to other Personal Data Subjects, except in cases where there are legal grounds for disclosure of such personal data.

The request must contain:

- number of the main identity document of the Personal Data Subject or his representative, information about the date of issue of the specified document and the issuing authority;
- information confirming the Personal Data Subject's participation in relations with the Operator (contract number, date of conclusion of the contract, conditional word designation and /or other information), or information otherwise confirming the fact of personal data processing by the Operator;
- signature of the Personal Data Subject or their representative.

The request can be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

If the request (request) of the Personal Data Subject does not reflect all the necessary information in accordance with the requirements of the Law on Personal Data, or the subject does not have access rights to the requested information, then a reasoned refusal is sent to him.

The right of a personal data Subject to access their personal data may be restricted in accordance with part 8 of Article 14 of the Law on Personal Data, including if access to personal data is restricted.



Access of the personal data subject to their personal data violates the rights and legitimate interests of third parties.

12.2. If inaccurate personal data is identified when a Personal Data Subject or his representative applies, or at their request or at the request of Roskomnadzor, the Operator blocks personal data related to this Personal Data Subject from the moment of such request or receipt of the specified request for the verification period, if blocking personal data does not violate the rights and legitimate interests of the personal data subject or third parties.

If the fact of inaccuracy of personal data is confirmed, the Operator must, based on the information provided by the Personal Data Subject or his representative or Roskomnadzor, or other necessary documents, clarify the personal data within 7 (seven) business days from the date of submission of such information and remove the blocking of personal data.

12.3. In case of detection of illegal processing of personal data when applying (requesting) a Personal Data Subject or his representative or Roskomnadzor, the Operator blocks illegally processed personal data related to this Personal Data Subject from the moment of such request or receipt of the request.

12.4. When the purposes of personal data processing are achieved, as well as if the Personal Data Subject withdraws consent to their processing, personal data is subject to destruction if:

- otherwise is not provided for in the contract to which the Personal Data Subject is a party, beneficiary or guarantor;
- the Operator does not have the right to process personal data without the consent of the Subject on the grounds provided for by the Law on Personal Data or other federal laws;
- no other agreement between the Operator and the Personal Data Subject provides otherwise.

### **13.1. Consent to receive advertising newsletters**

13.1. The Operator has the right to carry out advertising newsletters and process personal data of Site visitors for the specified purpose. By registering and giving separate consent to receive advertising newsletters, the Site user agrees to receive advertising newsletters in the following ways:

- a) sms-mailings; b) push-messages;
- c) by e-mail;
- d) through telecommunication networks, including through the use of telephone, facsimile, mobile radiotelephone communication;
- e) messages in social networks (Vkontakte and Odnoklassniki (Mail.<url>")) and messengers WhatsApp, Telegram, MAX, etc.

13.2. The User can always refuse to receive informational messages by sending an email to the Operator's email address [request@interisegroup.com](mailto:request@interisegroup.com)

### **14. Final provisions**

14.1. The Policy may be changed at any time at the Operator's discretion.

14.2. If, for any reason, one or more provisions of the Policy are found to be invalid or unenforceable, these circumstances do not affect the validity or applicability of the remaining provisions of the Policy.

14.3. All suggestions or questions regarding this Privacy Policy, as well as requests for information about the processing of personal data, should be sent to the following email address [request@interisegroup.com](mailto:request@interisegroup.com)

14.4. The deadline for responding to a User's request for processing personal data is 10 days.