

# Consent to the processing of personal data

## Text of the data processing agreement:

### 1. General provisions

1.1. The policy on processing personal data (hereinafter referred to as the Policy) is aimed at protecting the rights and freedoms of individuals whose personal data is processed by IP Trifanov D.A. (hereinafter referred to as the Operator).

1.2. The Policy is developed in accordance with Part 2 of Article 18.1 of the Federal Law No. 152-FZ dated July 27, 2006, "On Personal Data" (hereinafter referred to as the Federal Law "On Personal Data").

1.3. The Policy contains information that must be disclosed in accordance with Part 1 of Article 14 of the Federal Law on Personal Data and is a publicly available document.

### 2. Information about the operator

2.1. The Operator operates at 73A Malysheva str., Yekaterinburg, Sverdlovsk region.

2.2. Director Dmitry A. Trifanov (phone +7 (343) 271-90-09) is responsible for organizing the processing of personal data.

2.3. The database of information containing personal data of citizens of the Russian Federation is located at: Malysheva 73A.

### 3. Information about processing personal data

3.1. The Operator processes personal data on a lawful and fair basis in order to perform the functions, powers, and duties assigned by law, as well as to exercise the rights and legitimate interests of the Operator, its employees, and third parties.

3.2. The Operator obtains personal data directly from the subjects of personal data.

3.3. The Operator processes personal data in automated and non-automated ways, using and without using computer technology.

3.4. The actions of processing personal data include collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction.

3.5. The databases of information containing personal data of citizens of the Russian Federation are located in the territory of the Russian Federation.

### 4. Processing of employees ' personal data

4.1. The Operator processes personal data of employees of the Operator within the framework of legal relations regulated by the Labor Code of the Russian Federation No. 197-FZ of December 30, 2001 (hereinafter referred to as the Labor Code), including Chapter 14 of the Labor Code of the Russian Federation concerning the protection of personal data of employees.

4.2. The Operator processes personal data of employees in order to: - keep personnel records — - maintain accounting records; - perform functions, powers and duties assigned by the legislation of the Russian Federation to the Operator, including providing personal data to state authorities, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, and the Federal Fund of the Russian Federation. mandatory health insurance, as well as to other state bodies; - comply with the norms and requirements for labor protection and ensuring personal safety of employees of IP Trifanov D. A., property safety; - control the quantity and quality of work performed; - provide benefits and compensation provided for by the legislation of the Russian Federation — - publish on the website, in internal directories, address books, etc. the organization's books.

4.3. The Operator does not make decisions affecting the interests of employees based on their personal data obtained electronically or solely as a result of automated processing.

4.4. The Operator protects the personal data of employees at its own expense in accordance with the Labor Code of the Russian Federation, the Federal Law "On Personal Data," and other federal laws.

4.5. The Operator provides employees and their representatives with a signed copy of the documents establishing the procedure for processing the personal data of employees, as well as their rights and obligations in this area.

4.6. The Operator allows access to employees' personal data only to authorized individuals who have the right to receive only the data necessary for their functions.

4.7. The Operator obtains all employees' personal data from them. If an employee's data can only be obtained from a third party, the Operator notifies the employee in advance and obtains their written consent. The Operator informs the employee about the purposes, sources, methods of obtaining, and the nature of the data to be obtained, as well as the consequences of the employee's refusal to provide written consent.

4.8. The Operator processes the personal data of employees with their written consent, provided for the duration of the employment contract.

4.9. The Operator processes the personal data of employees during the duration of the employment contract. The Operator processes the personal data of dismissed employees within the period established by paragraph 5 of part 3 of Article 24 of the first part of the Tax Code of the Russian Federation dated July 31, 1998, No. 146-FZ, part 1 of Article 29 of the Federal Law "On Accounting" dated December 6, 2011, No. 402-FZ, and other regulatory legal acts.

4.10. The Operator may process special categories of employees' personal data (information about their health related to their ability to perform their work functions) in accordance with paragraph 2.3 of part 2 of Article 10 of the Federal Law "On Personal Data."

4.11. The Operator does not process employees' biometric personal data.

4.12. The Operator does not receive information about employees' membership in public associations or their trade union activities, except in cases specified in the Labor Code of the Russian Federation or other federal laws.

4.13. The operator processes the following personal data of employees: — Last name, first name, patronymic; — Type, series, and number of the identity document; — Date of issue of the identity document, and information about the issuing authority; — Address; — Income; — Position; — Year of birth; — Month of birth; — Date of birth; — Place of birth; — Taxpayer identification number; — State pension insurance certificate number; — Nationality; — Profession; — Pension insurance contributions; — Medical insurance contributions; — Tax deductions; — Retirement; — Employee number; — Work experience.

4.14. The Operator does not disclose the employee's personal data to a third party without the employee's written consent, except in cases where it is necessary to prevent a threat to the employee's life or health, or in other cases specified in the Labor Code of the Russian Federation, the Federal Law on Personal Data, or other federal laws.

4.15. The Operator does not disclose the employee's personal data for commercial purposes without the employee's written consent.

4.16. The Operator transfers the personal data of employees to their representatives in accordance with the procedure established by the Labor Code of the Russian Federation, the Federal Law "On Personal Data" and other federal laws, and limits this information to only those data that are necessary for the representatives to perform their functions.

4.17. The Operator warns the persons receiving the employee's personal data that these data can only be used for the purposes for which they were provided, and requires these persons to confirm that this rule has been followed.

4.18. In accordance with the procedures established by law and in accordance with Article 7 of the Federal Law "On Personal Data," in order to achieve the goals of processing personal data and with the consent of employees, the Operator provides personal data of employees or entrusts their processing to the following persons: — Government agencies (PFR, FTS, FSS, etc.); — Bank (as part of the salary project).

4.19. An employee can freely and for free access information about their personal data and the processing of this data. An employee may obtain a copy of any record containing their personal data, except as otherwise provided

by federal law.

4.20. The employee can access medical records reflecting their health status through a medical professional of their choice.

4.21. The employee can designate a representative to protect their personal data.

4.22. The employee can request the deletion or correction of their incorrect or incomplete personal data, as well as data that has been processed in violation of the requirements of the Labor Code of the Russian Federation, the Federal Law on Personal Data, or another federal law. If the Operator refuses to exclude or correct the employee's personal data, the employee may express their disagreement in writing and provide a reason for their disagreement. The employee may also add a statement expressing their own opinion to the employee's personal data.

4.23. The employee may request that all individuals who have previously been provided with inaccurate or incomplete personal data be informed about any changes, corrections, or additions made to the data.

4.24. The Employee may appeal to a court against any unlawful actions or inaction by the Operator in the processing and protection of their personal data.

## **5. Processing of personal data of clients**

5.1. The Operator processes personal data of customers within the framework of legal relations with the Operator, regulated by Part Two of the Civil Code of the Russian Federation dated January 26, 1996, No. 14-FZ, (hereinafter referred to as "customers").

5.2. The Operator processes personal data of customers in order to comply with the laws of the Russian Federation, as well as in order to: — conclude and fulfill obligations under contracts with customers; — carry out activities specified in the constituent documents of Individual Entrepreneur Trifanov D.A.; — inform about new products, special promotions and offers.

5.3. The Operator processes customers' personal data with their consent, which is granted for the duration of the contracts concluded with them. In cases specified by the Federal Law "On Personal Data", consent is granted in writing. In other cases, consent is considered to have been granted upon conclusion of the contract or upon performance of conclusive actions.

5.4. The Operator processes the personal data of customers during the validity period of the contracts concluded with them. The Operator may process the personal data of customers after the expiration of the validity period of the contracts concluded with them during the period established by paragraph 5 of part 3 of Article 24 of the first part of the Tax Code of the Russian Federation, part 1 of Article 29 of the Federal Law on Accounting, and other regulatory legal acts. 5.5. The Operator processes special categories of personal data of minor clients with the written consent of their legal representatives, in accordance with Part 1 of Article 9 and Part 2 of Article 10 of the Federal Law on Personal Data.

5.6. The Operator processes the following personal data of customers: — Surname, name, patronymic; — Type, series and number of the identity document; — Date of issue of the identity document and information about the issuing authority; — Year of birth; — Date of birth; — Place of birth; — Address; — Contact phone number; — Month of birth; — Taxpayer identification number; — Number of the state pension insurance certificate; — Nationality; — Profession; — Income; — Insurance contributions for Pension Insurance; — Mandatory health insurance contributions; — Tax deductions; — Retirement; — Position; — Employee number; — Work experience.

## **6. Information about personal data security**

6.1. The Operator appoints a person responsible for organizing the processing of personal data in order to fulfill the obligations provided for by the Federal Law on Personal Data and the regulations adopted in accordance with it.

6.2. The Operator applies a set of legal, organizational, and technical measures to ensure the security of personal data in order to ensure the confidentiality of personal data and protect it from unauthorized actions: — provides unlimited access to the Policy, a copy of which is available at the Operator's location and may also be available on

the Operator's website (if available); — in accordance with the Policy, approves and implements the document "Regulation on the Processing of Personal Data" (hereinafter referred to as the Regulation) and other local acts; — familiarizes employees with the provisions of the legislation on personal data, as well as with the Policy and the Regulation; — allows employees to access personal data processed in the Operator's information system, as well as their physical media, only for the purpose of performing their work duties; — establishes rules for accessing personal data processed in the Operator's information system, and ensures the registration and accounting of all actions performed with such data; — assesses the potential harm that may be caused to personal data subjects in the event of a violation of the Federal Law on Personal Data; — identifies threats to the security of personal data when processing them in the Operator's information system; - applies organizational and technical measures and uses information protection tools necessary to achieve the established level of personal data security; — detects facts of unauthorized access to personal data and takes measures to respond, including the restoration of personal data modified or destroyed as a result of - assesses the effectiveness of measures taken to ensure the security of personal data before putting the Operator's information system into operation; - performs internal control over the compliance of personal data processing with the Federal Law "On Personal Data", regulatory legal acts adopted in accordance with it, requirements for personal data protection, Policies, Regulations and other local requirements. This includes monitoring the measures taken to ensure the security of personal data and their level of security when processed in the Operator's information system.

## **7. Rights of personal data subjects**

7.1. The personal data subject has the right: — to receive personal data related to this subject and information related to their processing — - to clarify, block or destroy his / her personal data if they are incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing; — to withdraw their consent to the processing of personal data; - to protect their rights and legitimate interests, including compensation for damages and compensation for moral damage in court; — to appeal against the actions or omissions of the Operator to the authorized body for the protection of the rights of personal data subjects or in court.

7.2. To exercise their rights and legitimate interests, personal data subjects have the right to contact the Operator or submit a request in person or through a representative. The request must contain the information specified in Part 3 of Article 14 of the Federal Law on Personal Data.