

# PERSONAL DATA POLICY

## 1. GENERAL

**The Personal Data Policy** (the “Policy”) has been developed in accordance with Federal Law No. 152-FZ "On Personal Data" of 27 July 2006 (the “Federal Law 152”).

The Policy sets out a procedure of processing personal data and outlines personal data security practices adopted in **OOO BPM PLATFORM**, INN/KPP 9715394455/771501001, located at 36 Bolshaya Novodmitrovskaya, bld. 12, Floor 1 (mezzanine), Area I, Office 1, Moscow 127015 (the “Operator”) to protect human and civil rights and freedoms in the course of personal data processing, including rights to privacy.

The Policy exploits the following key concepts:

- **“Operator”** means a government body, a municipal body, a legal entity or an individual that, independently or in cooperation with other entities, organises or conducts the processing of personal data. The Operator also determines the objective for processing personal data, the content of personal data to be processed and the operations to be performed on personal data.
- **“Personal Data”** means any information, directly or indirectly, relating to an identified or identifiable individual (data subject).
- **“Personal data processing”** means any action (operation) or a set of actions (operations) performed on personal data, whether or not by automated means, such as collection, recording, systematising, accumulation, storage, rectification (updating, alteration), retrieval, use, transmission (dissemination, making available, accessing), depersonalising, blocking, erasure or destruction of personal data.
- **“Provision of personal data”** means any action performed with the aim to disclose personal information to a certain person or a certain group of persons.
- **“Distribution of personal data”** means any action intended to disclose personal data to an indefinite group of persons (personal data transfer) or to expose personal data to the general public, including publishing personal data in mass media, disclosing personal data in information and telecommunications networks, as well as otherwise providing access to personal data.
- **“Cross-border transfer of personal data”** means transfer of personal data to the territory of a foreign country, to a foreign authority, foreign natural person or foreign legal entity.
- **“Personal data destruction”** means any action that makes it impossible to recover the content of personal data in personal data information system and/or that leads to destruction of physical media that store personal data.
- **“Depersonalisation of personal data”** means any action that makes it impossible to attribute personal data to a particular data subject without using supplementary information.
- **“Blocking of personal data”** means temporary suspension of personal data processing (unless the processing is required to verify personal data).
- **“Automated processing of personal data”** means computer-assisted processing of personal data.
- **“Personal data information system”** means the totality of personal data contained in databases, together with information technologies and tools that enable their processing.

The Company should publish or otherwise provide unlimited access to the Data Processing Policy in compliance with Article 18.1, Part 2 of Federal Law 152.

## **2. PRINCIPLES AND CONDITIONS OF PERSONAL DATA PROCESSING**

### **2.1 Personal data collection**

The Operator collects and processes personal data to provide information on services and advertising campaigns offered by the Operator, as well as to notify Personal Data Subjects (Users) about special offers and various events. Based on personal data, the Operator can improve its services, content and communications.

User's personal data may be requested at any time, including when the User contacts the Operator. The Operator may use such data in accordance with the Policy. The Operator can also combine such information with other data to provide and improve its products, services, content and communications,

The Operator may collect various data/information, including the following:

- Full name;
- Telephone number;
- Email address;
- Passport details;
- Registration address;
- Mail address;
- Organisation;
- Job position.

Personal data can also include additional information provided by the Users upon the Operator's request for the purpose of performing the Operator's contractual obligations to the Users. Specifically, the Operator may request from the User a copy of their personal identification documents or other documents containing their full name, User's photo, and other additional data the Operators deems required and sufficient for identification of the User to prevent abuse or violation of third party rights.

When the user involves other persons in the Operator's events and activities and invites them to take part in communications, the Operator may collect personal data of such persons provided by the User, such as full name, date of birth, mail address, email address and phone number.

The Operator may automatically collect the following User information during each session on sensei.plus (the "Website"):

- technical information, including IP (Internet Protocol) address used to connect the User's computer to the Internet, information about the type and version of the User's browser, time zone settings, types and versions of browser plug-ins, operating system and platform;
- information about the User's session, including IP (Internet Protocol) address, browser type and language, information about the internet provider, information about the operating system, browsing history with full Uniform Resource Locators (URL) during and after the Website session (including date and time), viewed or searched products, page response time, loading errors, time spent on particular pages, information about actions taken on a webpage (scrolling, clicks, cursor rollover) and about methods used to leave a page, as well as information about the phone number used to call the Customer Service.

- operational and behavioural advertising cookies used to differentiate an individual User from other Website Users to facilitate information flow analysis, personalise advertising settings and measure advertising effectiveness. The User can disable cookies in web browser or mobile device settings. It should be taken into account that some website features can be unavailable when cookies are disabled.

User's personal data are stored on electronic media and/or in hard copy and processed by automated and non-automated systems.

## 2.2 Principles of personal data processing

The Operators processes personal data in accordance with the following principles:

- Legitimacy and equitable basis;
- Limiting the processing of personal data to certain predetermined and legally justified purposes;
- Excluding personal data processing in a manner that is inconsistent the purposes of personal data collection;
- Ensuring that databases containing personal data will not be merged if they are used to process data for mutually incompatible purposes;
- Processing only those personal data necessary for the particular operation at hand;
- Ensuring that the contents and the volume of processed personal data comply with the stated purposes of the processing;
- Excluding processing of personal data that are redundant as against the stated purposes of processing;
- Ensuring that personal data are accurate, sufficient and relevant for the particular operation at hand;
- Destroying or depersonalising personal data upon achieving the processing purposes or when it is no longer necessary to achieve such purposes, as well as when the Operator cannot eliminate personal data breaches, unless otherwise stipulated by federal law.

## 2.3 Conditions of personal data processing

The Operator processes personal data subject to meeting at least one of the following conditions:

- The personal data processing is performed with data subject's consent for their personal data processing;
- The personal data processing is required under an international treaty to which the Russian Federation is a party or under law, to discharge the operator's functions, exercise its powers and fulfil its duties vested therein by Russian law;
- The personal data processing is required to deliver justice, enforce a court order or a ruling of another authority or an official that are to be enforced in accordance with Russian law on enforcement proceedings;
- The personal data processing is required under a contract to which the data subject is a party or under which the data subject acts as a beneficiary or guarantor; as well as to sign a contract at the initiative of the data subject or a contract under which the data subject will act as a beneficiary or guarantor;

- The personal data processing is required to exercise the rights and legal interests of contractors or other third parties, or to create value for society, provided that it does not lead to a violation of the rights and freedoms of the data subject;
- The personal data processing is undertaken on personal information to which the data subject has provided public or otherwise explicit access (the “Publicly available personal data”);
- The personal data processing is required for complying with rules on publishing or obligatory disclosure, in accordance with federal law.

#### 2.4 Confidentiality of personal data

The Operator and other persons with access to personal data may not disclose the data to third parties or distribute the data without the personal data subject’s consent, unless otherwise stipulated by law.

#### 2.5 Public sources of personal data

The Operator may create public sources of personal data, including directories and address books, for information purposes. Public sources of personal data may include, subject to data subject’s written consent, full name, date and place of birth, job position, phone numbers, email address and other personal data provided by the personal data subject.

Information about the data subject should be excluded at any time from public sources of personal data upon data subject's request or by decision of the court or other relevant government authorities.

#### 2.6 Special categories of personal data

The Operator may process special categories of personal data, such as information about race, nationality, political views, religious or philosophical beliefs, state of health and intimate life, subject to the following:

- The data subject has given written consent to processing their personal data;
- The personal data have been made publicly available by the data subject;
- The personal data processing is performed in compliance with law on government social assistance, employment law, Russian law on state-provided pension and on occupational pension;
- The personal data processing is required to protect the life, health or other vital interests of the data subject or the life, health or other vital interests of other persons, where it is impossible to obtain the data subject’s consent;
- The personal data processing is performed for healthcare and prevention purposes, to make a medical diagnosis, to render medical and health and social services, given that the personal data processing is performed by a healthcare professional that must maintain medical confidentiality in accordance with Russian law;
- The personal data processing is required to establish and exercise rights of the data subject and third parties, as well as to execute justice;
- The personal data processing is performed in accordance with law on mandatory insurance and with insurance laws.

Processing of special categories of personal data should be immediately terminated upon removal of the processing reasons, unless otherwise stipulated by federal law.

The Operator may only process personal data on previous convictions to the extent set out by federal law.

## 2.7 Biometric personal data

The Operator may only process individual physiological and biological information that can be used to identify a person (biometric personal data) subject to data subject's written consent.

## 2.8 Instructing third parties on processing personal data

The Operator may instruct a third party to process personal data with consent of the data subject under an agreement with the third party, unless otherwise stipulated by federal law. Any third party that processes personal data on behalf of the Operator must comply with principles and rules of personal data processing as set out by Federal Law 152.

## 2.9 Cross-border transfer of personal data

The Operator must verify that any foreign country to which personal data is to be transferred provides an adequate level of protection for the rights of data subjects before completing any personal data transfers.

The cross-border transfer of personal data to foreign countries that do not provide an adequate level of protection for the rights of data subjects may take place under the following circumstances:

- The data subject gives their written consent to the cross-border transfer of their personal data;
- The transfer is required to execute a contract to which the data subject is a party.

# 3. RIGHTS OF PERSONAL DATA SUBJECTS

## 3.1 Consent of personal data subjects to processing of their personal data

Personal data subjects shall decide whether or not to provide their personal data and shall give consent to processing thereof freely, of their own will and in their own interest. Consent to processing of personal data may be given by the personal data subject or their representative in any form which provides evidence for its acceptance, unless otherwise stipulated by federal law.

The Operator is liable for providing evidence of having received data subject's consent to processing their personal data or evidence of relevant grounds as set out in Federal Law 152.

## 3.2 Rights of personal data subjects

A personal data subject may receive from the Operator information about processing of their personal data, unless the right is limited by federal law. A personal data subject may request the Operator to update, block or destroy their personal data if such data are incomplete, obsolete, inaccurate, illegally obtained or unnecessary for the stated purposes of processing, as well as take actions to protect their rights as set out by law.

Personal data processing for the purpose of goods, services, work promotion in the market through direct contacts with potential buyers via communication means, and for political solicitation purposes is subject to preliminary consent of the personal data subject. Such processing of personal data is deemed to be performed without preliminary consent of the

personal data subject if the Company fails to provide evidence of having obtained such a consent.

The Operator must immediately terminate processing of personal data for the above purposes upon data subject's request.

No decision shall be made solely based on automated processing of personal data when such decisions have legal implications for the personal data subject or otherwise affect their rights and legitimate interests, unless otherwise provided by federal law or if a written consent of the personal data subject has been obtained.

If a personal data subject believes that the Operator processes their personal data in violation of Federal Law 152 or otherwise violates their rights and freedoms, the personal data subject may file a complaint against actions (or omissions) of the Operator with a relevant authority for the protection of the rights of data subjects or appeal to a court.

A personal data subject may protect their rights and legal interests, including the right to claim damages and/or compensation of moral injuries through legal proceedings.

#### **4. PERSONAL DATA SECURITY**

Security of personal data processed by the Operator is ensured through legal, organisational and technical measures required to comply with federal laws on personal data protection.

The Operator takes the following organisational and technical measures to prevent unauthorised access to personal data:

- Appoints data processing and data protection officers;
- Limits access of third parties to personal data;
- Familiarises subjects with requirements set out by federal law and Operator's regulations on personal data processing and protection;
- Arranges for data media accounting, storage and circulations;
- Identifies personal data security threats inherent to their processing and builds threat models;
- Develops personal data protection frameworks based on the threat model;
- Checks readiness and effectiveness of data protection means;
- Assigns access privileges for information resources, software and hardware for data processing;
- Logs and takes account of user operations on personal data information systems;
- Employs antivirus tools and recovery tools for the personal data protection system;
- Applies firewalling, penetration detection, vulnerability analysis and cryptographic protection tools as required;
- Controls access to the Operator's premises, ensures protection of sites where personal data processing facilities are located.

When the User uses particular products, services or applications of the Operator or posts to forums, chats or social media, the personal data provided by the User are visible to other users and can be viewed, collected or used by them. The User is responsible for personal data provided by them in such cases. For example, when the User specifies their name and email address in a forum post, such information becomes public. Please be cautious of using such features.

### **Third party websites and services**

The Operator's websites, products, applications and services may contain links to third party websites, products and services. The Operator's products and services may also use or offer third party products and services. Personal data and information collected by third parties, including location, contact information and other data, are subject to confidentiality rules adopted by such third parties. The Operator urges the User to examine confidentiality rules of such third parties.

The Operator shall not be liable for actions of third parties that have obtained access to User information resulting from using the Internet or Website Services, or for implications of using such data and information that are available to any Internet user due to the Website nature.

### **Confidentiality questions**

Should the User have questions about the Operator's Personal Data Policy or about data processing by the Operator, the User can contact the Operator at the Operator's contact details.

## **5. TRANSFER OF PERSONAL DATA**

Personal data of Users shall not be transferred to third parties, unless explicitly stipulated by the Policy.

Processing of User's personal data is performed for an unlimited time, in any lawful way, including in personal data information systems with or without automated tools.

The User agrees that the Operator may only transfer personal data to third parties, specifically to courier services, postal organisations, telecom operators, etc., for purposes set out in section "Personal data collection" herein.

When instructed by the User or when User's consent is available, User's personal data may be transferred to third parties (Operator's counterparties) provided that such counterparties have assumed confidentiality obligations in regard to the received information.

User's personal data may only be transferred upon requests from relevant government authorities of the Russian Federation on the grounds and according to the procedure stipulated by Russian law.

The Operator blocks personal data about the relevant User from the date when the User or their representative in law or the relevant authority for the protection of the rights of data subjects make a relevant application or request, for the review period in case of identification of inaccurate data or unlawful actions.

### **Disclosures to third parties**

In some cases, the Operator may provide particular personal information and data to strategic partners who collaborate with the Operator to deliver goods and services or to those partners who help the Operator sell goods and services to consumers. The Operator provides personal data to third parties in the minimum amount required for delivery of a given service and performance of a given transaction.

The Operator will only provide personal data to deliver goods and services to the User, as well as to improve such goods and services and related communications. Such data will not be provided to third parties for their marketing purposes.

To use personal data for any other purpose, the Operator requests the User's Consent to their personal data processing.

### **Service providers**

The Operator provides personal data/information to providers of such services as information processing, lending, customer order fulfilment, delivery, other consumer services, identification of User's interest in goods and services, consumer analysis and satisfaction surveys.

Such providers must protect the User's information irrespective of their location.

### **Other parties**

The Operator might have to disclose personal data in compliance with law, legal process, legal proceedings and/or public requests or requests from government authorities within or outside the territory of the User's location. The Operator may disclose personal data/information about the User if the Operator finds such a disclose required or appropriate for the purpose of national security, law enforcement or in other cases vital for the public.

The Operator may also disclose personal data/information about the User if the Operator finds such a disclose required to execute the Operator's terms and conditions or to protect its business and users. Additionally, in case of reorganisation, merger or sale, the Operator may transfer any or all collected personal data to the relevant third party.

## **6. DESTROYING PERSONAL DATA**

User's personal data shall be destroyed in the following cases:

- the User deletes their data from their personal page (when such pages are provided by the website features) by deleting the account in their profile settings;
- the personal data subject withdraws their consent for personal data processing.

## **7. WITHDRAWAL OF A CONSENT FOR PERSONAL DATA PROCESSING**

Any User may ask the Operator not to process their personal data for marketing campaigns. The Operator informs the user about the intent to use the data for the specified purpose before collecting their personal data.

The User may withdraw their consent for personal data processing. To do so, the User should send an email to the Operator to [bpmplatform.llc@gmail.com](mailto:bpmplatform.llc@gmail.com) or call at +7(499) 647-85-31 or send a request to: 36 Bolshaya Novodmitrovskaya, bld. 12, Floor 1 (mezzanine), Area I, Office 1.

## **8. AMENDMENTS TO THE PERSONAL DATA POLICY**

Any amendments to the Policy will be published on the Website and, where required, sent to Users by email or otherwise. Amendments come into force upon their publication. Using the Website upon publication of Policy amendments is viewed as consent to the amendments.



## **9. FINAL PROVISIONS**

Other rights and obligations of the Operator as a personal data operator are set out by Russian law on personal data.

The Operator's officials guilty of violation of personal data processing and protection regulations are financially, administratively, civilly and criminally liable and subject to disciplinary action as stipulated by federal law.

The Policy does not apply to operations of third party internet resources.