

Personal Data Processing Policy

1. General Provisions

This Personal Data Processing Policy is prepared in accordance with the requirements of the Federal Law of July 27, 2006, No. 152-FZ "On Personal Data" (hereinafter referred to as the "Personal Data Law") and determines the procedure for processing personal data and measures to ensure the security of personal data undertaken by LLC "CPI" (hereinafter referred to as the "Operator").

1.1. The Operator's most important goal and condition for its activities is the observance of human and citizen's rights and freedoms when processing their personal data, including the protection of the rights to privacy, personal and family secrets.

1.2. This Operator's policy regarding the processing of personal data (hereinafter referred to as the "Policy") applies to all information that the Operator may obtain about visitors to the website <https://geointellect.net/>.

1.3. The Operator is a person who independently processes personal data.

2. Basic Concepts Used in the Policy

2.1. Automated processing of personal data – processing of personal data using computer technology.

2.2. Blocking of personal data – temporary cessation of personal data processing (except for cases where processing is necessary to clarify personal data).

2.3. Website – a set of graphical and informational materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address <https://geointellect.net/>.

2.4. Personal data information system — a set of personal data contained in databases and information technologies and technical means ensuring their processing.

2.5. Depersonalization of personal data — actions as a result of which it is impossible to determine, without the use of additional information, the belonging of personal data to a specific User or other subject of personal data.

2.6. Processing of personal data – any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.7. Operator – a state body, municipal body, legal or natural person, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as determining the purposes of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data.

2.8. Personal data – any information relating directly or indirectly to a specific or identifiable User of the website <https://geointellect.net/>.

2.9. Personal data permitted by the subject of personal data for dissemination – personal data, access to which is provided to an unlimited number of persons by the subject of personal data by giving consent to the processing of personal data permitted by the subject for dissemination in the manner prescribed by the Personal Data Law (hereinafter referred to as "personal data permitted for dissemination").

2.10. User – any visitor to the website <https://geointellect.net/>.

2.11. Provision of personal data – actions aimed at disclosing personal data to a specific person or a specific circle of persons.

2.12. Dissemination of personal data – any actions aimed at disclosing personal data to an

indefinite circle of persons (transfer of personal data) or at familiarizing an unlimited number of persons with personal data, including the publication of personal data in the mass media, posting in information and telecommunication networks, or providing access to personal data in any other way.

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

2.14. Destruction of personal data – any actions as a result of which personal data are irretrievably destroyed with no possibility of further restoration of the content of personal data in the personal data information system and (or) material carriers of personal data are destroyed.

3. Basic Rights and Obligations of the Operator

3.1. The Operator has the right:

- To receive from the subject of personal data reliable information and/or documents containing personal data;
- In case the subject of personal data withdraws consent to the processing of personal data, the Operator has the right to continue processing personal data without the subject's consent if there are grounds specified in the Personal Data Law;
- Independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations provided for by the Personal Data Law and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws.

3.2. The Operator is obliged:

- To provide the subject of personal data, upon his/her request, with information regarding the processing of his/her personal data;
- To organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;
- To respond to appeals and requests from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
- To report to the authorized body for the protection of the rights of personal data subjects, upon the request of this body, the necessary information within 10 days from the date of receipt of such request;
- To publish or otherwise provide unrestricted access to this Policy regarding the processing of personal data;
- To take legal, organizational, and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data;
- To cease the transfer (distribution, provision, access) of personal data, cease processing, and destroy personal data in the manner and cases provided for by the Personal Data Law;
- To perform other duties provided for by the Personal Data Law.
- In case of incidents (identified leaks): a) within 24 hours, notify Roskomnadzor of the causes and harm of the leak, b) within 72 hours, conduct an investigation of the incident and report its results.
- Not to transfer personal data abroad, including to Uzbekistan, Kazakhstan, Kyrgyzstan, Belarus, Armenia.

4. Basic Rights and Obligations of Personal Data Subjects

4.1. Personal data subjects have the right:

- To receive information regarding the processing of their personal data, except in cases provided for by federal laws. The information is provided to the personal data subject by the Operator in an accessible form and shall not contain personal data relating to other personal data subjects, except in cases where there are legal grounds for disclosing such personal data. The list of

information and the procedure for obtaining it are established by the Personal Data Law;

- To require the operator to clarify their personal data, block or destroy them if the personal data are incomplete, outdated, inaccurate, illegally obtained, or are not necessary for the stated purpose of processing, and to take statutory measures to protect their rights;
- To set a condition of prior consent when processing personal data for the purpose of promoting goods, works, and services on the market;
- To withdraw consent to the processing of personal data;
- To appeal to the authorized body for the protection of the rights of personal data subjects or in court against unlawful actions or inaction of the Operator when processing their personal data;
- To exercise other rights provided for by the legislation of the Russian Federation.

4.2. Personal data subjects are obliged:

- To provide the Operator with reliable data about themselves, including if they are in the countries Uzbekistan, Kazakhstan, Kyrgyzstan, Belarus, Armenia, Azerbaijan, Tajikistan, Turkmenistan;
- To inform the Operator about the clarification (updating, change) of their personal data.

4.3. Persons who provided the Operator with inaccurate information about themselves or information about another personal data subject without the latter's consent shall be liable in accordance with the legislation of the Russian Federation.

5. The Operator May Process the Following User Personal Data

5.1. Last name, first name, patronymic.

5.2. Email address.

5.3. Phone numbers.

5.4. The site also collects and processes depersonalized data about visitors (including "cookies") using internet statistics services (Yandex Metrica, Google Analytics, and others).

5.5. The above data hereinafter in the Policy are collectively referred to as Personal Data.

5.6. The Operator does not process special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, intimate life.

5.7. Processing of personal data permitted for dissemination, from the special categories of personal data specified in Part 1 of Article 10 of the Personal Data Law, is allowed if the prohibitions and conditions provided for in Article 10.1 of the Personal Data Law are observed.

5.8. The User's consent to the processing of personal data permitted for dissemination is executed separately from other consents to the processing of their personal data. In this case, the conditions provided for, in particular, by Article 10.1 of the Personal Data Law are observed. The requirements for the content of such consent are established by the authorized body for the protection of the rights of personal data subjects.

5.8.1 The User provides consent to the processing of personal data permitted for dissemination directly to the Operator.

5.8.2 The Operator is obliged to publish, no later than three business days from the moment of receiving the specified User consent, information on the processing conditions, prohibitions, and conditions for the processing of personal data permitted for dissemination by an unlimited number of persons.

5.8.3 The transfer (distribution, provision, access) of personal data permitted by the personal data subject for dissemination must be terminated at any time at the request of the personal data subject. This request must include the last name, first name, patronymic (if any), contact information (phone number, email address, or postal address) of the personal data subject, as well as a list of personal data whose processing is to be terminated. The personal data specified in this request can be processed only by the Operator to whom it is sent.

5.8.4 Consent to the processing of personal data permitted for dissemination ceases to be effective from the moment the Operator receives the request specified in clause 5.8.3 of this Policy regarding the processing of personal data.

6. Principles of Personal Data Processing

- 6.1. The processing of personal data is carried out on a lawful and fair basis.
- 6.2. The processing of personal data is limited to the achievement of specific, predetermined, and lawful purposes. Processing of personal data incompatible with the purposes of collecting personal data is not allowed.
- 6.3. It is not allowed to combine databases containing personal data processed for incompatible purposes.
- 6.4. Only personal data that meet the purposes of their processing are subject to processing.
- 6.5. The content and volume of processed personal data correspond to the stated purposes of processing. Redundancy of processed personal data in relation to the stated purposes of their processing is not allowed.
- 6.6. When processing personal data, the accuracy of personal data, their sufficiency, and, where necessary, relevance in relation to the purposes of personal data processing are ensured. The Operator takes necessary measures and/or ensures their taking to delete or clarify incomplete or inaccurate data.
- 6.7. The storage of personal data is carried out in a form that allows identification of the personal data subject, for no longer than required by the purposes of personal data processing, unless the storage period for personal data is established by federal law, an agreement to which the personal data subject is a party, beneficiary, or guarantor. Processed personal data are destroyed or depersonalized upon achieving the processing purposes or in case of loss of necessity to achieve these purposes, unless otherwise provided by federal law.

7. Purposes of Personal Data Processing

- 7.1. The purpose of processing the User's personal data:
 - Informing the User by sending emails;
 - Providing the User with access to services, information, and/or materials contained on the website <https://geointellect.net/>.
- 7.2. The Operator also has the right to send the User notifications about new products and services, special offers, and various events. The User can always refuse to receive informational messages by sending the Operator an email to csr@geointellect.com with the note "Refusal of notifications about new products and services and special offers."
- 7.3. Depersonalized User data collected using internet statistics services are used to collect information about User actions on the site, improve the quality of the site and its content.

8. Legal Grounds for Processing Personal Data

- 8.1. The legal grounds for the processing of personal data by the Operator are:
 - Contracts concluded between the operator and the subject of personal data;
 - Federal laws, other regulatory legal acts in the field of personal data protection;
 - Users' consents to the processing of their personal data, to the processing of personal data permitted for dissemination.
- 8.2. The Operator processes the User's personal data only if they are filled in and/or sent by the User independently through special forms located on the site <https://geointellect.net/> or sent to the Operator via email. By filling out the relevant forms and/or sending their personal data to the Operator, the User expresses their consent to this Policy.
- 8.3. The Operator processes depersonalized data about the User if this is allowed in the User's browser settings (saving "cookies" and using JavaScript technology are enabled).
- 8.4. The subject of personal data independently decides on the provision of their personal data and gives consent freely, by their own will, and in their own interest.

9. Conditions for Processing Personal Data

- 9.1. The processing of personal data is carried out with the consent of the subject of personal data to the processing of their personal data.
- 9.2. The processing of personal data is necessary to achieve the purposes provided for by an international treaty of the Russian Federation or law, for the performance of functions, powers, and duties imposed on the operator by the legislation of the Russian Federation.
- 9.3. The processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another body or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings.
- 9.4. The processing of personal data is necessary for the performance of a contract to which the personal data subject is a party, or a contract under which the personal data subject will be a beneficiary or guarantor, as well as for concluding a contract on the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor.
- 9.5. The processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator or third parties or for the achievement of socially significant purposes, provided that the rights and freedoms of the personal data subject are not violated.
- 9.6. The processing of personal data is carried, access to which is provided to an unlimited number of persons by the personal data subject or at their request (hereinafter referred to as "publicly available personal data").
- 9.7. The processing of personal data subject to publication or mandatory disclosure in accordance with federal law is carried out.

10. Procedure for Collection, Storage, Transfer, and Other Types of Personal Data Processing

The security of personal data processed by the Operator is ensured through the implementation of legal, organizational, and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.

- 10.1. The Operator ensures the security of personal data and takes all possible measures to prevent access to personal data by unauthorized persons.
- 10.2. The User's personal data will under no circumstances be transferred to third parties, except in cases related to the execution of current legislation or if the personal data subject has given consent to the Operator for the transfer of data to a third party to fulfill obligations under a civil law contract.
- 10.3. In case of inaccuracies in personal data, the User can update them independently by sending a notification to the Operator's email address csr@geointellect.com with the note "Updating personal data."
- 10.4. The period for processing personal data is determined by the achievement of the purposes for which the personal data were collected, unless a different period is provided for by the contract or current legislation.

The User may at any time withdraw their consent to the processing of personal data by sending a notification to the Operator via email to the Operator's email address csr@geointellect.com with the note "Withdrawal of consent to the processing of personal data."

10.5. All information collected by third-party services, including payment systems, communication means, and other service providers, is stored and processed by these persons (Operators) in accordance with their User Agreement and Privacy Policy. The personal data subject and/or User is obliged to independently familiarize themselves with these documents in a timely manner. The Operator is not responsible for the actions of third parties, including the service providers mentioned in this clause.

10.6. The prohibitions established by the personal data subject on the transfer (except for granting access), as well as on the processing or conditions of processing (except for obtaining access) of personal data permitted for dissemination, do not apply in cases of processing personal data in state, public, and other public interests defined by the legislation of the Russian Federation.

10.7. The Operator, when processing personal data, ensures the confidentiality of personal data.

10.8. The Operator stores personal data in a form that allows identification of the personal data subject for no longer than required by the purposes of personal data processing, unless the storage period for personal data is established by federal law, a contract to which the personal data subject is a party, beneficiary, or guarantor.

10.9. The condition for terminating the processing of personal data may be the achievement of the purposes of processing personal data, the expiration of the consent of the personal data subject, or the withdrawal of consent by the personal data subject, as well as the identification of unlawful processing of personal data.

11. List of Actions Performed by the Operator with the Received Personal Data

11.1. The Operator performs collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data.

11.2. The Operator performs automated processing of personal data with the receipt and/or transmission of the received information via information and telecommunication networks or without it.

12. Cross-Border Transfer of Personal Data

12.1. The Operator does not transfer personal data outside the Russian Federation, including to the countries Uzbekistan, Kazakhstan, Kyrgyzstan, Belarus, Armenia, Tajikistan, and others.

13. Confidentiality of Personal Data

The Operator and other persons who have gained access to personal data are obliged not to disclose to third parties and not to distribute personal data without the consent of the personal data subject, unless otherwise provided by federal law.

14. Final Provisions

14.1. The User can receive any clarifications on questions of interest regarding the processing of their personal data by contacting the Operator via email at csr@geointellect.com.

14.2. This document will reflect any changes to the Operator's personal data processing policy. The Policy is valid indefinitely until replaced by a new version.

14.3. The current version of the Policy is freely available on the Internet at https://geointellect.com/files/privacy_policy.pdf.