

Personal Data Processing Policy

1. General provisions

1.1. The Personal Data Processing Policy at Deeplay LLC (hereinafter referred to as the Policy) defines the fundamental principles, goals, conditions and methods of personal data processing, lists of subjects and personal data processed at Deeplay LLC, functions of Deeplay LLC in the processing of personal data, the rights of personal data subjects, as well as those requirements for the protection of personal data implemented at Deeplay LLC.

1.2. The Policy was developed in accordance with the requirements of the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation in the field of personal data, as well as the requirements of Regulation No. 2016/679 of the European Parliament and of the Council of the European Union on the protection of individuals in the processing of personal data and on the free circulation of such data, as well as the repeal of Directive 95/46/EC (hereinafter referred to as the EU Regulation).

1.3. The provisions of the Policy serve as the basis for the development of local regulations governing the processing of personal data of employees of Deeplay LLC and other personal data subjects in Deeplay LLC.

1.4. The Policy is the foundation for the development of local regulations defining the policy of processing personal data of these organizations by subsidiaries and organizations of Deeplay LLC.

2. Legislative and other regulatory legal acts of the Russian Federation, in accordance with which the Personal Data Processing Policy in Deeplay LLC is determined.

2.1. The Personal Data Processing Policy at Deeplay LLC is determined in accordance with the following regulatory legal acts:

- the RF Labor Code;
- Federal Law No. 152-FZ "On Personal Data" dated 27 July 2006;
- Decree of the President of the Russian Federation No. 188 "On Approval of the List of Confidential Information" dated 06 March 1997 ;
- Resolution of the Government of the Russian Federation No. 687 "On Approval of the Regulation on the Specifics of Personal Data Processing Conducted without the Use of Automation Tools" dated 15 September 2008;
- Resolution of the Government of the Russian Federation No. 512 "On Approval of Requirements for Material Carriers of Biometric Personal Data and Technologies for Storing Such Data Outside Personal Data Information Systems" dated 06 July 2008;
- Resolution of the Government of the Russian Federation No. 1119 "On Approval of Requirements for the Protection of Personal Data During Their Processing in Personal Data Information Systems" dated 01 November 2012;
- FSTEC (Federal Service for Technology and Export Control) Order No. 21 "On Approval of the Composition and Content of Organizational and Technical Measures to Ensure the Security of Personal Data During Their Processing in Personal Data Information Systems" dated 18 February 2013;

- Roskomnadzor (Federal Service for Supervision of Communications, Information Technology, and Mass Media) Order No. 996 "On Approval of Requirements and Methods for Depersonalization of Personal Data" dated 05 September 2013;
- other regulatory legal acts of the Russian Federation and regulatory documents of competent state authorities.

2.2. In order to implement the Policy provisions, Deeplay LLC develops relevant local regulations and other documents, including:

- regulation on the personal data processing in Deeplay LLC;
- other local regulations and documents governing the personal data processing in Deeplay LLC.

3. The main terms and definitions used in the local regulations of Deeplay LLC governing the personal data processing

Personal data should mean any information relating directly or indirectly to a specific or identifiable natural person (subject of personal data).

Personal data authorized by the subject of personal data for distribution should mean personal data, access to which is provided to an indefinite number of persons by the subject of personal data by giving consent to the processing of personal data authorized by the subject of personal data for distribution in accordance with the procedure provided for by the current legislation of the Russian Federation.

Information should mean details (messages, data) regardless of the form of their presentation.

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

Personal data processing should mean any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Automated personal data processing should mean the personal data processing by means of computer technology.

Personal data provision should mean actions aimed at disclosing personal data to a certain person or certain people.

Personal data dissemination should mean actions aimed at dissemination of personal data to the public.

Cross—border personal data transfer should mean the personal data transfer to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

Personal data blocking should mean the temporary termination of the personal data processing (except in cases where the processing is necessary to clarify personal data).

Personal data destruction should mean actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which the tangible carriers of personal data are destroyed.

Personal data depersonalization should mean actions, as a result of which it becomes impossible to determine the identity of personal data to a specific subject of personal data without the use of additional information.

Personal data information system should mean a set of personal data contained in databases and information technologies and technical means that ensure their processing.

4. Principles and purposes of personal data processing

4.1. Deeplay LLC processes the personal data of employees of Deeplay LLC and other personal data subjects who are not in an employer-employee relationship with Deeplay LLC.

4.2. The personal data processing at Deeplay LLC is performed taking into account the need to ensure the protection of the rights and freedoms of employees of Deeplay LLC and other personal data subjects, including the protection of the right to privacy, personal and family secrets, based on the following principles:

- personal data processing is performed at Deeplay LLC on a legal and fair basis;
- personal data processing is limited to the attainment of specific, predetermined and legitimate goals;
- personal data processing incompatible with the purposes of personal data collection is not allowed;
- combining databases containing personal data, the processing of which is carried out for purposes incompatible with each other, is not allowed;
- only personal data that meets the purposes of their processing is subject to processing;
- content and volume of the processed personal data correspond to the declared purposes of processing. Redundancy of the processed personal data in relation to the declared purposes of their processing is not allowed;
- when processing personal data, the accuracy of personal data, their sufficiency, and, if necessary, relevance in relation to the purposes of personal data processing are ensured. Deeplay LLC takes the necessary measures or ensures that they are taken to delete or clarify incomplete or inaccurate personal data;
- personal data is stored in a form that allows to identify the subject of personal data no longer than the purposes of personal data processing require, unless the period of personal data storage is established by a federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor;
- the processed personal data is destroyed or depersonalized upon attainment of the processing goals or in case of loss of the need to achieve these goals, unless otherwise provided by a federal law.

4.3. Deeplay LLC processes personal data for the following purposes:

- enforcement of the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation, local regulations of Deeplay LLC;
- exercise of functions, powers and duties assigned by the legislation of the Russian Federation to Deeplay LLC, including the provision of personal data to public authorities, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Compulsory Medical Insurance Fund, as well as other government agencies;
- regulation of labor relations with employees of Deeplay LLC (assistance in employment, training and promotion, personal safety, control of the quantity and quality of work performed, ensuring the safety of property);
- protection of life, health or other vital interests of personal data subjects;
- preparation, conclusion, execution and termination of contracts with contractors;
- provision of access and internal security policies at Deeplay LLC;
- formation of reference materials for the internal information support of the activities of Deeplay LLC;
- execution of judicial acts, acts of other bodies or officials subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;
- execution of the rights and legitimate interests of Deeplay LLC within the framework of the activities provided for by the Articles of Association and other local regulations of Deeplay LLC, or third parties, or the achievement of socially meaningful goals;
- for other legitimate purposes.

5. List of subjects whose personal data are processed at Deeplay LLC

Deeplay LLC processes personal data of the following categories of subjects:

- employees of Deeplay LLC and its standalone divisions;
- other subjects of personal data (to ensure the implementation of the processing purposes specified in Section 4 of the Policy).

6. List of personal data processed by Deeplay LLC

6.1. The list of personal data processed by Deeplay LLC is determined in accordance with the legislation of the Russian Federation, the EU Regulations and local regulations of Deeplay LLC, taking into account the purposes of personal data processing specified in Section 4 of the Policy.

6.2. The processing of special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, and intimate life is not performed at Deeplay LLC.

6.3. The processing of biometric personal data in Deeplay LLC is allowed only with the written consent of the subject of personal data, except in cases provided for by the legislation of the Russian Federation.

6.4. The processing of personal data authorized by the subject of personal data for distribution is performed at Deeplay LLC on the basis of the consent of the subject of personal data for

distribution in compliance with the prohibitions and conditions for processing personal data established by the subject of personal data.

7. Functions of Deeplay LLC in the personal data processing

During the personal data processing, Deeplay LLC:

- takes measures required and sufficient to ensure compliance with the requirements of the legislation of the Russian Federation, the EU Regulations and local regulations of Deeplay LLC in the area of personal data;
- takes legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions in relation to personal data;
- appoints the person responsible for organizing the processing of personal data at Deeplay LLC;
- issues local regulations defining the policy and matters of processing and protection of personal data at Deeplay LLC;
- provides familiarization of employees of Deeplay LLC, who directly process personal data, with the provisions of the legislation of the Russian Federation and local regulations of Deeplay LLC in the area of personal data, including requirements for the protection of personal data, and training of these employees;
- publishes or otherwise provides unrestricted access to this Policy;
- informs subjects of personal data or their representatives in accordance with the established procedure about the availability of personal data related to the relevant subjects, provides an opportunity to familiarize with these personal data when contacting and (or) receiving requests from these subjects of personal data or their representatives, unless otherwise established by the legislation of the Russian Federation;
- terminates the processing and destroys personal data in cases provided for by the legislation of the Russian Federation in the field of personal data and the EU Regulation;
- performs other actions provided for by the legislation of the Russian Federation in the field of personal data and the EU Regulations.

8. Terms of personal data processing at Deeplay LLC

8.1. The personal data processing at Deeplay LLC is performed with the consent of the personal data subject to the processing of his personal data, unless otherwise provided for by the legislation of the Russian Federation in the area of personal data.

8.2. Deeplay LLC does not disclose or distribute personal data to third parties without the consent of the personal data subject, unless otherwise provided by federal law.

8.3. Deeplay LLC has the right to assign the processing of personal data to another person with the consent of the personal data subject on the basis of an agreement concluded with this person. The agreement must contain a list of actions (operations) with personal data that would be performed by the person processing personal data, the purposes of processing, the obligation of

such a person to respect the confidentiality of personal data and ensure the security of personal data during their processing, as well as requirements for the protection of processed personal data in accordance with Article 19 of the Federal Law "On Personal Data".

8.4. For the purposes of internal information support, Deeplay LLC may create guides, address books and other sources in which, with the written consent of the subject of personal data, unless otherwise provided for by the legislation of the Russian Federation, their personal data may be included.

8.5. Access to personal data processed by Deeplay LLC is allowed only to employees of Deeplay LLC who hold positions where personal data is processed when they are replaced.

9. List of actions with personal data and methods of their processing

9.1. Deeplay LLC collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes and destroys personal data.

9.2. The personal data processing at Deeplay LLC is performed in the following ways:

- non-automated personal data processing;
- automated processing of personal data with or without transmission of the received information via information and telecommunication networks;
- mixed personal data processing.

10. Rights of subjects of personal data

The subjects of personal data have the following rights:

- to full information about their personal data processed by Deeplay LLC;
- to access their personal data, including the right to receive a copy of any record containing their personal data, except in cases provided for by federal law;
- to clarify their personal data, block it or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing;
- to revoke consent to the personal data processing;
- to take measures provided for by law to protect their rights;
- to appeal against the actions or omissions of Deeplay LLC, performed in violation of the requirements of the legislation of the Russian Federation in the field of personal data, to the authorized body for the protection of the rights of personal data subjects or to the court;
- to exercise other rights provided for by law.

11. Measures taken by Deeplay LLC to ensure the fulfillment of the operator's duties in the personal data processing

11.1. The measures necessary and sufficient to ensure that Deeplay LLC fulfills the operator's obligations provided for by the legislation of the Russian Federation in the field of personal data include:

- the appointment of the person responsible for the organization of personal data processing at Deeplay LLC;
- the adoption of local regulations and other documents in the field of personal data processing and protection;
- the organization of training and conducting methodological work with employees of Deeplay LLC, who hold positions where personal data is processed when they are substituted;
- the consent of the subjects of personal data to the processing of their personal data, except in cases provided for by the legislation of the Russian Federation;
- the separation of personal data processed without the use of automation tools from other information, in particular by fixing them on separate material carriers of personal data, in special sections;
- the provision of separate storage of personal data and their tangible media, the processing of which is carried out for different purposes and which contain different categories of personal data;
- the security of personal data when they are transmitted through open communication channels;
- the storage of material carriers of personal data in compliance with the conditions that ensure the safety of personal data and exclude unauthorized access to them;
- the implementation of internal control over the compliance of personal data processing with the Federal Law "On Personal Data" and regulatory legal acts adopted in accordance with it, requirements for the protection of personal data, the present Policy, local regulations of Deeplay LLC;
- other measures provided for by the legislation of the Russian Federation in the field of personal data and the EU Regulation.

12. Control over compliance with the legislation of the Russian Federation and local regulations of Deeplay LLC in the field of personal data, including requirements for personal data protection

12.1. Control over compliance by the structural divisions of the administration of Deeplay LLC with the legislation of the Russian Federation and local regulations of Deeplay LLC in the field of personal data, including requirements for personal data protection, is performed in order to verify compliance of personal data processing in Deeplay LLC with the legislation of the Russian Federation and local regulations of Deeplay LLC in the field of personal data, including the requirements for the personal data protection, as well as the measures taken, aimed at preventing and detecting violations of the legislation of the Russian Federation in the field of personal data, identifying possible channels of leakage and unauthorized access to personal data, and eliminating the consequences of such violations.

12.2. Internal control over compliance by Deeplay LLC with the legislation of the Russian Federation and local regulations of Deeplay LLC in the field of personal data, including requirements for personal data protection, is carried out by the person responsible for organizing the processing of personal data by Deeplay LLC.

12.3. Personal responsibility for compliance with the requirements of the legislation of the Russian Federation and local regulations of Deeplay LLC in the field of personal data in Deeplay LLC, as well as for ensuring the confidentiality and security of personal data in these divisions of Deeplay LLC encumbers upon its CEO.