

Website Privacy Policy **Law Firm “Gorodissky & Partners” Ltd.**

PLEASE READ THIS POLICY CAREFULLY. THIS POLICY DESCRIBES THE TERMS AND CONDITIONS OF PROCESSING YOUR PERSONAL DATA ON THE WEBSITES WWW.GORODISSKY.RU AND/OR WWW.GORODISSKY.COM AND/OR WWW.GORODISSKYIPSECURITY.COM

1 General

- 1.1 This Website Privacy Policy is prepared in accordance with Article 18.1(1)(2) of the Federal Law of the Russian Federation No. 152-Φ3 “On Personal Data” dated 27 July 2006 and defines the position of Law Firm “Gorodissky & Partners” Ltd. with respect to the processing and protection of personal data, the observance of the rights and freedoms of every data subject, and in particular the right to private life, personal and family secrets, on the websites www.gorodissky.ru , www.gorodissky.com and www.gorodisskyipsecurity.com, as well as in cases where data subjects contact Law Firm “Gorodissky & Partners” Ltd. regarding the services or activities of the firm via the e-mail addresses, phone numbers, or feedback forms provided on the said websites.
- 1.2 Law Firm “Gorodissky & Partners” Ltd., incorporated under the laws of the Russian Federation (identification taxpayer’s number INN 7702195561, main state registration number OGRN 1027739045630) and registered at: Russia, 129090, Moscow, Bolshaya Spasskaya street 25, building 3, acts as the personal data operator.
- 1.3 The Policy of Law Firm “Gorodissky & Partners” Ltd. regarding personal data processing is based on the principle that personal data shall be processed only in the cases and in the manner established by applicable law on a lawful and fair basis. The observance and protection of the rights and legitimate interests of data subjects constitute the top priority of Law Firm “Gorodissky & Partners” Ltd.
- 1.4 For the purposes of this Website Privacy Policy, the following terms are used whether or not they are capitalized in the text hereof.
- Company* – Law Firm “Gorodissky & Partners” Ltd. acting as the operator of the Data.
- Confidentiality of Personal Data* – requirement not to disclose personal data to third parties without the operator’s permission that is applicable to any person having access to personal data.
- Data* – personal data processed by the Company in accordance with this Policy.
- Data Subject* – natural person to whom the personal data relate.
- Employees* – natural persons with whom the Company has employment relations.
- Event Participants* – natural persons intending to participate and/or participating in business events (conferences, seminars, receptions, etc.).
- Job Applicants* – natural persons proposing their candidacies for vacant positions in the Company.
- Operator* – state authority, municipal authority, legal entity, or natural person that, independently or jointly with other persons, organizes and/or conducts the processing of personal data, as well as determines the purposes of personal data processing, personal data categories to be processed, and the actions (operations) performed with personal data.
- PDL* – Federal Law “On Personal Data” No. 152-Φ3 dated 27 July 2006.
- Personal Data* – any information relating to a directly or indirectly identified or identifiable

natural person (data subject).

Personal Data Actualization – actions aimed at clarifying, updating, and amending personal data in order to ensure that personal data is actualized in relation to the purposes of their processing.

Personal Data Blockage – temporary suspension of personal data processing (except in cases where the processing is necessary for clarifying personal data).

Personal Data Collection – intended process of obtaining personal data from a data subject.

Personal data Cross-border Transfer – transfer of personal data to the territory of a foreign state to a foreign operator.

Personal Data Destruction – actions resulting in the impossibility of restoring the personal data within the ISPDn and/or resulting in the destruction of the tangible data media.

Personal Data Informational System, ISPDn – a set of personal data contained in databases, as well as information technologies and technical means used for the processing of such data.

Personal Data Provision – actions aimed at disclosing personal data to a specific person or to a specific group of persons.

Personal Data Storage – process of maintaining personal data in a structured form at the disposal of the Company.

Policy – this Website Privacy Policy.

Processing of Personal Data – any action (operation) or a set of actions (operations) performed, with or without the use of automation means, in relation to personal data, including collection, record, systematization, accumulation, storage, clarification (update, change), extraction, use, dissemination, transfer (provision, access), blockage, deletion, or destruction of personal data.

Roscomnadzor – Data Protection Authority.

Users – all data subjects whose Data are collected or otherwise processed via the Websites.

Web-Analytical Data – information concerning websites previously visited by Users, the versions and types of their browsers, operating systems and devices, language, time zone, display, and other device settings, the supported version of the Flash plug-in, the presence and support of JavaScript, the contents of cookies, the geographic regions from which Users access the Websites, the presumed interests of Users, page views, the time spent on the Websites, file downloads, and other similar data collected through the use of Web-Analytical Services.

Web-Analytical Services – web-analytical tools, online ratings, and other similar instruments used to assess website traffic, evaluate the popularity of the Website and its sections among the target audience, study the demand for services offered on the Website, and solve other similar tasks.

Website – a Website or any of the Websites depending on the context.

Websites – Company's websites accessible under the domain names www.gorodissky.ru , www.gorodissky.com и www.gorodisskiysecurity.com, as well as all their sections and subdomains, including but not limited to ipmobile.gorodissky.ru , franchise.gorodissky.ru , artlaw.gorodissky.ru.

1.5 Data subjects have the following basic rights:

- (a) right to obtain information regarding the processing of their Data;
- (b) right to request the clarification, blockage, or destruction of Data if they are incomplete, outdated, inaccurate, unlawfully obtained, or not necessary for the stated purpose of processing;
- (c) right to appeal against the actions (or inaction) of the Company before public authorities, including through judicial proceedings;
- (d) right to protect their rights and lawful interests, including the right to claim damages and/or compensation for moral harm through judicial proceedings or in accordance with another procedure established by applicable law;
- (e) right to request the termination of personal data processing in cases established by law; and
- (f) other rights established by applicable law.

- 1.6 The Company, as the Data operator, shall have the right to process the Data only in cases, for the purposes, and under the conditions established by the PDL.
- 1.7 The Company bears the following obligations:
- (a) when collecting the Data, the Company shall, upon request of the data subject, provide the information specified in Article 14(7) of the PDL;
 - (b) if the provision of the Data is mandatory the law, the Company shall explain to the data subject the legal consequences of refusing to provide their Data;
 - (c) the Company shall take the measures necessary and sufficient to ensure the fulfillment of obligations established by the PDL and regulatory legal acts adopted in accordance therewith;
 - (d) the Company shall publish this Policy and information about the implemented requirements for personal data protection on the Website pages used for collecting personal data and shall ensure access to the said document;
 - (e) the Company shall take, or ensure the involved processors take, the necessary legal, organizational, and technical measures to protect the Data from unlawful or accidental access, destruction, alteration, blockage, copying, provision, dissemination of the Data, as well as from other unlawful actions in relation to the Data;
 - (f) the Company shall notify Roscomnadzor in the event of unlawful or accidental transfer (provision, dissemination, access) of personal data resulting in the violation of data subjects' rights, in accordance with the procedure established by the PDL and the Company's internal regulations;
 - (g) the Company shall respond to requests from data subjects and inquiries from Roscomnadzor and provide them with information concerning the processing of Data in the manner prescribed by the PDL;
 - (h) the Company shall remedy violations of legislation committed during Data processing, as well as clarify, block, and destroy the Data (or ensure that such actions are performed by a processor);
 - (i) the Company shall, prior to commencing the processing of personal data, notify Roscomnadzor of its intention to process personal data, except in cases established by law;
 - (j) the Company shall appoint a Data Protection Officer;
 - (k) the Company shall bear other obligations established by law in connection with the processing of Data.

2 Data Collection Purposes

- 2.1 The Data processing shall be limited to achieving specific, pre-defined, and lawful purposes. The Data processing that is incompatible with the purposes of Data collection shall be prohibited.
- 2.2 The Company processes the Data for the purposes specified in Article 4.3 of this Policy.

3 Lawful Bases for Data Processing

- 3.1 The legal basis for personal data processing is the set of legal acts pursuant to and in accordance with which the operator carries out the processing of personal data.
- 3.2 The legal bases for Data processing are specified in Article 4.3 hereof.

4 Data Categories and Data Subjects

- 4.1 The scope of the processed Data shall correspond to the declared purposes of processing. The processed Data shall not be excessive in relation to the declared purposes of their processing.
- 4.2 The Company does not process any special categories of personal data (for example, information concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, or health status) on the Websites.
- 4.3 The main Data categories and the relevant purposes of processing are specified below.

Data Subject Types	Data Categories	Data Processing Purposes	Processing Methods	Data Processing and Storage Periods	Data Destruction Procedure	Lawful Basis
Users The <i>Users</i> shall mean all data subjects whose Data are collected or otherwise processed via the Websites.	Personal data: – surname, name; – company name; – contact details (phone number, email address); – message.	Providing feedback	With the use of automation tools	Upon completing the correspondence (no longer than 90 days from the day when the last message was received)	Deleting the data from then ISPDn	Data subject's consent: art.6(1)(1) PDL; performing a contract concluded with the User (Terms of Use) (art.6(1)(5) PDL)
	Personal data: – email address; – subscription preferences; – subscription password.	Conducting Mailings	With the use of automation tools	Upon withdrawing data processing consent (by cancelling the mailing)	Deleting the data from then ISPDn	Data subject's consent: art.6(1)(1) PDL; performing a contract concluded with the User (Terms of Use) (art.6(1)(5) PDL)
	Personal data: – information contained in cookie files; – web-analytical data.	Ensuring website functioning	With the use of automation tools	Upon withdrawing data processing consent by a data subject	Deleting the data from then ISPDn	Data subject's consent: art.6(1)(1) PDL; performing a contract concluded with the User (Terms of Use) (art.6(1)(5) PDL)
	Personal data: – web-analytical data.	Performing marketing	With the use of automation tools	Upon withdrawing data processing consent by a data subject	Deleting the data from then ISPDn	Data subject's consent: art.6(1)(1) PDL; performing a contract concluded with the User (Terms of Use) (art.6(1)(5) PDL)
Event Participants The <i>Event Participants</i> shall mean natural persons	Personal data: – surname, name and patronymic; – position;	Conducting business negotiations	With the use of automation tools and without the use of automation tools	Until the end of an event or until the end of the limitation period	Deleting the data from then ISPDn and destroying paper documents	Data subject's consent: art.6(1)(1) PDL; performing a contract concluded with the User (Terms of Use) (art.6(1)(5) PDL)

intending to participate and/or participating in business events (conferences, seminars, receptions, etc.)	– company-employer; – contact details; – date and time of visit; – event name; – consumer preferences.			(3 years) calculated from the termination day of an event participation contract (if concluded)		PDL)
Job Applicants The <i>Job Applicants</i> shall mean natural persons proposing their candidacies for vacant positions in the Company	Personal data: – surname, name, and patronymic; – city; – contact details (phone number, email address); – CV content and attached documents; – cover letter content.	Considering job applicants	With the use of automation tools and without the use of automation tools	Upon making a final decision on employment or refusal of employment (but in any case no longer than 90 days)	Deleting the data from then ISPDn and destroying paper documents	Data subject's consent: art.6(1)(1) PDL
Employees The <i>Employees</i> shall mean natural persons with whom the Company has employment relations	Personal data: – surname, name and patronymic; – position; – patent attorney's status; – place of work; – employment with Law Firm "Goroditsky & Partners" Ltd.; – contact details; – information on education, specialization and profession; – information on	Business purposes (in particular, marketing)	With the use of automation tools	Until the end of employment with the Company	Deleting the data from then ISPDn	Data subject's consent: art.88(3) of the Labour Code; art.6(1)(1) and 10.1 PDL

	foreign language skills and level of proficiency; – information on professional courses and/or trainings; – employment (work) history information; – professional specialization; – professional certification and accreditation; – professional achievements; – publications; – speaking at events; – international organization membership; – honorary degrees and services; – rewards; – recommendations. Biometrical personal data: – photo.					
--	--	--	--	--	--	--

5 Data Processing Procedure and Conditions

- 5.1 The Company processes the Data using automated tools (including computers) and without the use of automated tools (including on paper). The Company may perform the following actions (operations) and/or a set of actions (operations) with the Data:
- collection;
 - recording;
 - systematization;
 - accumulation;
 - storage;
 - clarification (updating, changing);
 - extraction;
 - use;
 - transfer (provision, access);
 - blockage;
 - deletion;
 - destruction.

In addition to the aforementioned, the Company also disseminates Employees' Data by publishing such information in professional CVs on the Websites.

- 5.2 The Company always proceeds from the following assumptions:
- (a) all Data belong personally to the data subject or to the person specified in the relevant inquiry or web form;
 - (b) each data subject visiting the Websites is legally capable and of full age;
 - (c) the data subject provides accurate and up-to-date Data.
- 5.3 Data are processed until the purpose of their processing is achieved or until the data subject withdraws their consent to the processing of their Data, unless there are other grounds established by legislation for continuing the Data processing.
- 5.4 The Company transfers Data to courts, law enforcement bodies, supervisory authorities, and other competent public authorities and officials when there are grounds established by applicable law.
- 5.5 The Company recognizes the Data as strictly confidential information. The Company and other persons who have gained access to the Data shall not disclose or disseminate the Data to third parties without the consent of the respective data subject, unless otherwise provided for by federal law.
- 5.6 In accordance with Article 18.1(2) of the PDL, the Company publishes this Policy, as well as information on the implemented requirements for the Data protection (Schedule 1 hereto), on the Websites and ensures continuous, free, and unrestricted access thereto for all data subjects.
- 5.7 The Company takes, or ensures the adoption of, the necessary legal, organizational, and technical measures to protect the Data from unlawful or accidental access, destruction, alteration, blockage, copying, provision, and dissemination, as well as from other unlawful

actions in relation to the Data. The protection of Data shall be ensured, in particular, through the following means:

- (a) identifying threats to the Data security during their processing within personal data informational systems;
- (b) applying organizational and technical measures to ensure the security of the Data during their processing within personal data informational systems, necessary to meet the Data protection requirements that ensure the levels of data security established by the Government of the Russian Federation;
- (c) using information security tools that comply with the applicable conformity assessment;
- (d) using, for the destruction of Data, information security tools that comply with the applicable conformity assessment and that include a data destruction function;
- (e) assessing the effectiveness of the performed security measures before putting into operation a personal data informational system;
- (f) keeping records of computer media containing the Data;
- (g) detecting unauthorized access to the Data and taking measures, including detecting, preventing, and eliminating the consequences of computer attacks on the ISPDn and responding to computer incidents;
- (h) restoring the Data that have been modified or destroyed as a result of unauthorized access;
- (i) establishing rules for access to the Data processed within the personal data informational system and ensuring the registration and accounting of all actions performed with the Data within the personal data informational system;
- (j) monitoring the Data security measures and the security level of personal data informational systems.

- 5.8 Data processing may be terminated upon the achievement of its purposes, the expiration of the consent validity period, the withdrawal of the data subject's consent (where applicable), or the detection of unlawful Data processing.
- 5.9 Data shall be stored in a form that allows the identification of the data subject for no longer than required to achieve the purposes of Data processing, except where the retention period is established by federal law or by a contract to which the data subject is a party, beneficiary, or surety.
- 5.10 While collecting the Data, it is not allowed to record, systematize, accumulate, store, clarify (update, change), and retrieve of personal data of the Russian Federation citizens with the use of databases located outside the territory of the Russian Federation.
- 5.11 For feedback purposes, the Company collects the Data through feedback and call request forms on the Websites, as well as during communication with the User via the telephone numbers indicated on the Websites and upon receiving emails sent to the email addresses specified on the Websites. In such cases, the Company carries out Data processing and ensures confidentiality in accordance with this Policy. The purpose of Data processing shall be considered achieved if no further messages and/or calls are received from the User within 90 days following the last communication with the User on any matter by any of the aforementioned means. If the User orders services from the Company as a result of such communication, the Company shall treat he/she as a client, and the Data processing from that moment shall be governed by other documents defining the Company's policy on

processing client data.

- 5.12 The Company carries out Data processing to the minimum extent necessary for sending informational and marketing communications, provided that the User has given prior consent. The Company ensures that the User may, at any time, update his/her preferences regarding the topics of information received or unsubscribe from the mailing list.
- 5.13 The Company provides for the registration of Event Participants through relevant web forms on the Websites to organize business events held in person or online. At the Company's discretion, registration may also be carried out by the Event Participant contacting the Company via the telephone numbers or email addresses indicated on the Websites. The Company may also receive information about Event Participants from other event organizers, provided that the Event Participants have given their consent or other lawful bases exist for obtaining and further processing their Data.
- 5.14 The Company provides the possibility to submit CVs through the Websites for the purpose of considering Job Applicants. After a CV is submitted via the relevant web form, authorized Employees of the Company contact the Job Applicant using the contact details provided by him/her. Further communication with the Job Applicant is conducted without the use of the Websites.
- 5.15 Matters relating to the Data processing of Event Participants and Job Applicants that fall outside the scope established in Section 1.1 hereof may be regulated by other documents defining the Company's policy on personal data processing. The Company ensures that relevant Event Participants and Job Applicants have unrestricted access to and the ability to review such documents in accordance with Article 18.1(2) of the PDL.
- 5.16 The Data of the Company's management, lawyers, patent attorneys, and other Employees are published on the Websites for business (marketing) purposes based on the Employees' written consent obtained under Article 88(3) of the Labour Code of the Russian Federation and on the Employees' consent to the data dissemination obtained under Article 10.1 of the PDL.
- 5.17 In the consent to the personal data dissemination, each Employee may set restrictions on the transfer (except for access provision) of Data by the Company to the public, as well as restrictions or conditions for Data processing by the public(except for access provision). The Company may not refuse to implement the restrictions and conditions established by the Employee according to Article 10.1 of the PDL.
- 5.18 The Company shall publish information on the Data processing conditions and on the existence of any restrictions or conditions for Data processing by the public with respect to the disseminated Data within three business days from the date of receipt of the relevant consent of the Employees.

- 5.19 According to the preceding paragraph, as of the date of this Policy adoption the Company hereby informs that all Employees whose Data are published on the Websites
- have not established any restrictions on the transfer of their Data by the Company to the public, nor any prohibitions on the processing of their Data by the public;
 - have not established any conditions for the processing of their Data by the public;
 - have not established any conditions under which the obtained Data may be transferred by the Company only through its internal network (providing access solely to specifically authorized Employees), through information and telecommunication networks, or without any transfer of the obtained Data.

6 Special Conditions On Processing Web-Analytical Data and Cookie Files

- 6.1 The connection of the Websites to Web-Analytical Services is organized strictly in the standard manner prescribed by the rules of the respective Web-Analytical Service. In most cases, this involves adding a software code (script) provided by the Web-Analytical Service into the Websites' source code. The script enables the Web-Analytical Service to directly collect the information necessary for its operation. The Company does not independently collect or transfer information for processing to Web-Analytical Services in any manner.
- 6.2 The Web-Analytical Services collect information about visits to the Websites and Users' activities.
- 6.3 Web-analytical data shall be collected only in a depersonalized form and processed in an aggregated (generalized) manner. Such data cannot be attributed to an identified or identifiable natural person. To exclude the possibility of identifying Users as specific individuals, the Company never discloses to Web-Analytical Services any personal data of Users that may be known to the Company.
- 6.4 The Company may access Web-Analytical Data through personal accounts provided by the Web-Analytical Services. In this case, the Web-Analytical Data are provided to the Company in processed and aggregated (generalized) form as reports.
- 6.5 Web-Analytical Services may use various technical means to collect Web-Analytical Data, including cookies and other similar technologies (web beacons, IP addresses, Java scripts, etc.). Cookies are small text files stored on the device used by the User to access the relevant Website (personal computer, smartphone, tablet, etc.). These files may contain information necessary for the operation of Web-Analytical Services or the Websites, such as browser settings, visited pages, or interface preferences of the Websites. Web-Analytical Services typically use cookies for technical purposes (ensuring the functionality of the Web-Analytical Service) and analytical purposes (studying the behavior and interests of Website audiences, as well as other metrics characterizing the Websites' market performance). More detailed reference information about cookies is available here: <https://yandex.ru/support/browser/personal-data-protection/cookies.html>.
- 6.6 Below is the information about the main cookies that may be accepted by the User's device when visiting the Websites:

Cookie type	Description	Owner	How to reject a cookie
Analytical	Yandex Metrica cookies. Description: https://yandex.ru/support/metrica/general/cookie-usage.html	OOO YANDEX	Use Yandex Metrica opt-out add-on. For more details, see: https://yandex.ru/support/metrica/en/general/opt-out.html
Technical	bx_user_id - cookie file installed by Bitrix and used for retaining a unique ID of the chat function	OOO 1S-Bitrix	See Section 6.7 hereof
Technical	PHPSESSID – cookie file used to store and identify the User’s unique session ID for the purpose of managing his/her session on the website. The cookie is deleted when all browser windows are closed.	Law Firm “Gorodissky & Partners” Ltd.	See Section 6.7 hereof
Technical	Cookie file YandexSmartCaptcha	OOO YANDEX	See Section 6.7 hereof

- 6.7 The User has the right to refuse the acceptance of cookies and other web-analytics tools on his/her device at his/her own discretion. The User may either refrain from using the Websites or adjust the relevant settings in his/her browser. Most modern browsers and internet security software allow full, partial, or selective blocking of cookies and other technical means used to obtain Web-Analytical Data, as well as the deletion of previously stored cookies. The User is advised to review the security settings on his/her device and select the preferred options. The configuration process may vary depending on the browser. The User should refer to the *Help* or *Support* section of his/her browser and, if applicable, check the settings of his/her firewall (if any). If the User refuses to accept cookies or use other technical tools, the Company cannot guarantee that he/she will have unimpeded access to all features of the Websites for technical reasons.

Descriptions of the settings for the most popular browsers are available here:

Google Chrome: <https://support.google.com/chrome/answer/95647>

Microsoft Edge: <https://support.microsoft.com/ru-ru/help/4468242/microsoft-edge-browsing-data-and-privacy-microsoft-privacy>

Yandex Browser: <https://browser.yandex.ru/help/personal-data-protection/personal-data-protection.html>

The User may find information on how to opt out from Yandex.Metrica here: <https://yandex.ru/support/metrica/general/opt-out.html>.

- 6.8 To achieve its marketing objectives, the Company may configure advertising tools on social networks and other web resources using Web-Analytical Data, in compliance with the terms of use and privacy policies established by the respective Web-Analytical Services. This allows the User to see advertising banners related to the Company's services. The Company never processes Web-Analytical Data for the purpose of promoting goods, works, or services on the market through direct communication with potential clients by means of communication. Subject to the User's consent, the Company may transfer Web-Analytical Data to the owners of the relevant social networks and other web resources for their independent processing in accordance with the personal data processing (privacy) policies established by such entities.

7 Personal Data Actualization, Amendment, Deletion, and Destruction. Responses to Data Access Requests of Data Subjects

- 7.1 If the inaccuracy of the Data or the unlawfulness of their processing is confirmed, the Company shall update the Data, and the Data processing shall be terminated accordingly.
- 7.2 Upon achieving the Data processing purposes or in the event that the data subject withdraws his/her consent to such processing, the Data shall be destroyed, unless:
- (a) otherwise provided by a contract to which the data subject is a party, beneficiary, or surety;
 - (b) the Company is entitled to carry out Data processing without the data subject's consent on the grounds provided by the PDL or other federal laws; or
 - (c) otherwise provided by another agreement between the Company and the data subject.
- 7.3 The Company shall provide a data subject or his/her representative with information on the processing of the personal data belonging to such data subject upon his/her request.

8 Procedure for Responding to Requests or Inquiries from Data Subjects, Their Representatives,

and Competent Authorities Regarding Inaccurate Personal Data, Unlawful Data Processing, Withdrawal of Consent, and Data Subjects' Access to Their Data

- 8.1 Data subjects have the right to obtain information concerning the processing of their Data, including the following:
- (a) confirmation of the fact that their Data are processed by the Company;
 - (b) lawful bases and purposes of Data processing;
 - (c) purposes and methods of Data processing applied by the Company;
 - (d) name and location of the Company, as well as information on persons (other than the Company's Employees) who have access to the Data or to whom the Data may be disclosed under a contract with the Company or pursuant to a federal law;
 - (e) Data being processed relating to the respective data subject and the source of their receipt, unless another procedure for providing such data is established by a federal law;
 - (f) periods of Data processing, including the retention periods;
 - (g) procedure for exercising the rights of a data subject as provided by the Russian personal data laws;
 - (h) information on any completed or intended cross-border transfer of Data;
 - (i) name of the organization or surname, name and patronymic and address of the person carrying out Data processing on behalf of the Company, if the processing has been or will be entrusted to such organization or person;
 - (j) information on the methods by which the Company fulfills the obligations established by Article 18.1 of the PDL; and
 - (k) other information provided by the Russian data privacy laws.

To receive this information, data subjects may contact the Company using the contact details specified in Section 8.14 below.

- 8.2 Data subjects have the right to request that the Company clarify, block, or destroy their Data if such Data are incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the stated purpose of processing, as well as to take measures provided by law to protect their rights.
- 8.3 The information specified above shall be provided in an accessible form to the data subject by the Company and shall not contain Data relating to other data subjects, unless there are lawful grounds for disclosing such Data.
- 8.4 The information specified in this Section shall be communicated to the data subject or his/her representative, and they shall be provided with the opportunity to review the relevant Data either at the time of the request or within ten business days from the date of submission or receipt by the Company of the request from the data subject or his/her representative. This period may be extended for no more than five business days if the Company sends the data subject a reasoned notice specifying the reasons for the extension of the response period. The request must contain the following:
- (a) number of the primary identification document of the data subject or his/her representative, the date of its issue, and the name of the issuing authority;
 - (b) information confirming the participation of the data subject in legal relations with the Company or other information confirming the fact of personal data processing by the Company, as well as the signature of the data subject or his/her representative. The request may be submitted in the form of an electronic document and signed with an electronic signature according to the Russian laws.

- 8.5 If the information specified in this Section, as well as the processed Data, has been provided to the data subject for review upon his/her request, the data subject may submit a repeated request to the Company to obtain such information and review such Data no earlier than thirty days after the initial request or submission, unless a shorter period is established by a federal law, a regulatory enactment adopted in accordance therewith, or a contract to which the data subject is a party, beneficiary, or surety.
- 8.6 The data subject may repeatedly contact the Company or submit a repeated request to the Company to receive the information specified above and to review the processed Data before the expiration of the period specified in the preceding clause if the information and/or Data were not provided to him/her in full as a result of the initial request. A repeated request shall contain justification for its submission.
- 8.7 The Company may refuse to satisfy a repeated request from a data subject that does not meet the requirements established by law. Such refusal shall be reasoned.
- 8.8 The right of a data subject to access his/her Data may be restricted in accordance with federal laws, including where granting such access would violate the rights and legitimate interests of third parties.
- 8.9 The Company shall provide Roscomnadzor with the necessary information upon its request within the time limits established by the Russian laws.
- 8.10 All incoming requests and inquiries shall be registered as incoming correspondence and recorded in the relevant Company logs.
- 8.11 Requests and inquiries shall be reviewed by the Data Protection Officer. If any questions arise or clarification of the request content is required, the Data Protection Officer shall contact the person who submitted the request or inquiry using the contact details provided therein.
- 8.12 A response to a request or inquiry shall be provided in the same form in which the respective request or inquiry was received (for example, by email or in writing), unless otherwise expressly required by the Russian laws or another form is specifically requested in the submission.
- 8.13 A response to a data subject's inquiry may be signed by the Data Protection Officer or the Managing Partner. A response to a Roscomnadzor's request shall be signed by the Managing Partner or by a person acting on his behalf under a power of attorney issued in the name of the Company. All responses to requests and inquiries shall be recorded in the relevant Company's logs.
- 8.14 A request or inquiry may be submitted in any form to the following address:
Law Firm "Gorodissky & Partners" Ltd.
Attn: Data Protection Officer
Postal address: Russia, 129090, Moscow, Bolshaya Spasskaya street, 25, building 3.

Schedule. Information on the Implemented Personal Data Protection Requirements

Where necessary and taking into account the threats relevant to the ISPDn used by the Company for the Data processing, the Company implements the Data protection requirements listed below corresponding

to the third level of personal data security and/or ensures their implementation by the persons engaged for Data processing:

1. establishing a security regime for the premises where the ISPDn is located to prevent unauthorized entry or presence of persons without access rights;
2. ensuring the safekeeping of personal data media;
3. approval by the Company's head of a document defining the list of persons whose access to the personal data processed within the ISPDn is required for the performance of their official (employment) duties;
4. use of information security tools that have undergone conformity assessment in accordance with the requirements of the Russian laws on information security, where the use of such tools is necessary to neutralize existing threats; and
5. appointment of an employee responsible for ensuring the security of personal data within the ISPDn.