

Moscow Developer Group Limited Liability Company	APPROVED BY Director General _____ / E.O. Nikitina August 29, 2022		
	PREPARED BY Chief Legal Officer _____ / M.A. Kozhina		
	Number: СМК.ДОС.03.ПО.05.СОП.07	Personal Data Processing Policy of Moscow Developer Group LLC	
	Unit:	Front Office, Sales Department	Number of Pages: Ten (10)
	Version: No. 2	Effective Date: 29.08.2022	

1. General Provisions and Purpose of Personal Data Processing

1.1. The Personal Data Processing Policy (hereinafter referred to as the “Policy”) has been issued and applied by Moscow Developer Group, Limited Liability Company (hereinafter referred to as the “Company”) in accordance with Clause 2 Part 1 Article 18.1 of Federal Law No. 152-ФЗ On Personal Data dated 27.07.2006.

This Policy determines the rules, procedures, and conditions of the Company related to Personal Data Processing and establishes procedures aimed at preventing and detecting violations of the law of the Russian Federation, as well as eliminating the consequences of such violations related to Personal Data Processing.

Any issues related to Personal Data Processing not regulated hereby shall be resolved in accordance with the applicable personal data laws of the Russian Federation.

1.2. The purpose of Personal Data Processing is:

- protection of human and civil rights and freedoms of individuals when processing their Personal Data, including protection of privacy rights and personal and family secrets.
- market promotion of goods, works, and services of the Company by contacting a potential consumer directly using communication means (allowed as prescribed by [Clause 1.13](#) hereof).

1.3. Terms and definitions used in the Policy:

- 1) *Personal Data* shall mean any information relating to a specific individual or an individual determined based on such information (Personal Data Subject), including his/her name, patronymic, surname, year, month, date and place of birth, address, and marital status.
- 2) *Personal Data permitted for dissemination by the Personal Data Subject* shall mean information on the Subject, access to which has been provided to the general public by the Subject by giving his/her consent to the processing of these Personal Data permitted by him/her for dissemination as prescribed by Law No. 152-ФЗ (Article 3 of Law No. 152-ФЗ).
- 3) *Operator* shall mean a company that organizes and performs the Personal Data Processing, as well as determines the purposes of Personal Data Processing and the composition of Personal Data to be processed;
- 4) *Personal Data Processing* shall mean any action (operation) with Personal Data, including collection, systematization, accumulation, storage, clarification (update, change), use, transfer (including dissemination), processing, blocking, and destruction of personal data;
- 5) *Personal Data Use* shall mean actions (operations) with Personal Data performed by the Operator to make decisions or perform other actions that entail legal consequences for the Personal Data Subject or other persons or have another effect on the rights and freedoms of the Personal Data Subject or other persons.
- 6) *Dissemination of Personal Data* shall mean actions aimed at disclosing personal data to a certain group of people (transfer of personal data);

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- 7) *Personal Data Blocking* shall mean suspending collection, systematization, accumulation, use, and dissemination of Personal Data, including transfer thereof;
- 8) *Personal Data Anonymization* shall mean actions resulting in the impossibility to attribute Personal Data to a specific Personal Data Subject;
- 9) *Automated Processing of Personal Data* shall mean computer-assisted processing of personal data;
- 10) *Personal Data Destruction* shall mean actions resulting in the impossibility to restore the contents of Personal Data in the Personal Data Information System or in the destruction of hard copies of Personal Data.

1.4. This Policy shall apply to all structural subdivisions of the Company.

1.5. This document is a local regulation of the Company and shall come into force from the moment of signing an order on its introduction by the Director General of Moscow Developer Group LLC.

2. Subjects and Categories of Personal Data. Personal Data List

2.1. The Company shall process Personal Data of the following categories of Personal Data Subjects:

- 1) Guests — individuals who intend to request or request and use the services provided by the Company solely for personal, family, household, and other needs not related to business activities;
- 2) Counterparties — individuals who have entered into contracts with the Company for the provision of services and gain access to the territory of the Company to fulfill their contractual obligations.

2.2. The Company Information Systems shall process the following categories of Personal Data:

Category 1: Personal Data identifying the Personal Data Subject and providing additional information about him/her;

Category 2: Personal Data permitted for dissemination by the Personal Data Subject.

2.3. Personal Data of Guests shall be processed for the Company to run its core activities.

The composition of Personal Data of Guests shall be determined by the content of the registration form and confirmation of data by relevant documents, as well as the provision of related services to guests (visa support), and shall include:

- Surname, name, and patronymic;
- Date of birth;
- Place of birth;
- Passport details;
- Nationality;
- Actual residence address;
- Permanent residence address;
- Contact phone number;
- E-mail address;
- Data on documents permitting the stay in the Russian Federation (a migration card, residence permit, visa, temporary residence permit);
- Information on legal representatives (for minors);
- Bank account details;
- Surname, name, patronymic, dates of birth of family members.

2.4. Personal Data of Counterparties shall be processed within signed contracts to fulfill contractual obligations and ensure compliance with the law and other regulations. Personal Data of Counterparties shall include: surname, name, patronymic; passport data; actual residence address; contact phone number; e-mail address; taxpayer identification number.

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3. Rights of Personal Data Subjects.

3.1. A Personal Data Subject shall be entitled to receive the following information on the Company that processes his/her Personal Data: its location and the availability of Personal Data related to the relevant Personal Data Subject. The Personal Data Subject shall be entitled to get acquainted with such Personal Data.

3.2. The Company shall provide access to Personal Data to the Personal Data Subject or his/her legal representative upon application or request from the Personal Data Subject or his/her legal representative. The request shall contain the number of the primary identity document of the Personal Data Subject or his/her legal representative, information on the date of issue of the specified document and the issuing authority, and the handwritten signature of the Personal Data Subject or his/her legal representative. The request may be sent in electronic form and signed with an electronic digital signature in accordance with the law of the Russian Federation.

3.3. The Personal Data Subject shall be entitled to receive information regarding the processing of his/her Personal Data, including:

- Confirmation of the fact that Personal Data are processed by the Company, as well as the purpose of such processing;
- Personal Data processing methods used by the Company;
- Information on persons who have access to Personal Data or to whom such access can be provided; List of Personal Data being processed and the source of their receipt;
- Terms of Personal Data Processing, including terms of their storage;
- Information on the legal consequences for the Personal Data Subject which the processing of his/her Personal Data may entail.

3.4. The Personal Data Subject may require the Company to clarify, block, or destroy his/her Personal Data if Personal Data are incomplete, outdated, inaccurate, obtained illegally, or not required for the stated processing purpose as well as take measures provided for by the law to protect their rights.

4. Personal Data Processing.

4.1. In processing Personal Data, the Company shall follow the principles below:

- Legitimacy of purposes and methods of Personal Data Processing, integrity, and fairness in the Company's activities;
- Limitations of Personal Data Processing to the achievement of specific objectives which are predetermined and legitimate;
- Reliability of Personal Data, their sufficiency for processing, the inadmissibility of Personal Data Processing that is excessive in relation to the purposes stated when collecting Personal Data;
- Processing of only those Personal Data that meet the purposes of processing thereof; No processing of Personal Data incompatible with the purposes of collecting Personal Data shall be allowed.
- Conformity of the content and volume of the processed Personal Data to the stated processing purposes. The processed Personal Data shall not be excessive in relation to the stated purposes of processing thereof;
- Avoidance of database combination, where such databases contain Personal Data that may be processed for mutually incompatible purposes;
- Ensuring the Personal Data accuracy, adequacy, and where appropriate, relevance regarding the purposes of processing thereof; The Company shall take the necessary measures or ensure they are taken to remove or clarify incomplete or inaccurate data;

Personal Data storage in a form allowing identification of a Personal Data Subject for no longer

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than allowed in accordance with Personal Data Processing purposes, unless the storage period for Personal Data is established by federal law or an agreement to which he/she is a party. The processed Personal Data shall be destroyed or anonymized upon achievement of the processing purposes or in case there is no need to achieve those purposes anymore, unless otherwise provided for by federal law;

4.2. Personal Data shall be processed in compliance with the principles and rules provided for by Federal Law No. 152-ФЗ dated 27.07.2006 On Personal Data and hereby.

4.3. Methods of Personal Data Processing:

- Using automation tools;
- Without automation tools.

4.4. In accordance with the purposes and objectives set, the Company shall appoint a person responsible for organizing Personal Data Processing:

- Head of Front Service for Personal Data of Guests of the Company,
- Commercial Director for Personal Data of Counterparties (individuals),
- Manager of IT Department for the security of Personal Data Processing in information systems.

4.5. Persons responsible for Personal Data Processing receive instructions directly from the Director General of the Company.

4.6. When processing Personal Data, the following conditions shall be met:

4.6.1. Obtaining the consent of the Personal Data Subject;

4.6.2. Personal Data shall be processed by the Company with the consent of Personal Data Subjects, except when:

- Personal Data are processed under the federal law that establishes its purpose, the conditions for obtaining Personal Data, and the range of subjects whose personal data shall be processed, as well as determines the powers of the Operator (Company);
- Personal Data are processed to fulfill a contract one of the parties to which is the Personal Data Subject;
- Personal Data are processed for statistical or other scientific purposes, subject to the mandatory Personal Data Anonymization;
- Personal Data Processing is required to protect the life, health, or other vital interests of the Personal Data Subject while obtaining the consent of the Personal Data Subject is impossible;
- Personal Data Processing is required for the delivery of postal items by postal organizations, the settlements between telecommunication operators and users of communication services for communication services rendered, as well as the examination of claims from communication services users.

4.7. The information systems of the Company shall be prohibited from processing special categories of Personal Data relating to race, ethnic nationality, political views, religious or philosophical beliefs, health status, intimate life, and criminal record, except where:

- the Personal Data Subject has provided written consent to the processing of his/her Personal Data;
- Personal Data are permitted for dissemination by the Personal Data Subject;
- Personal Data refer to the state of health of the Personal Data Subject, and their processing is required to protect his/her life, health, or other vital interests or the life, health, or other vital interests of other persons while obtaining the consent of the Personal Data Subject is impossible;
- Personal Data are processed for medical and preventive purposes, for medical diagnostics, providing medical, clinical, and social services, provided that Personal Data are processed by a person professionally engaged in medical activities and obliged to maintain medical secrecy in accordance with the law of the Russian Federation;
- Personal Data Processing is required for the administration of justice;

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- Personal Data are processed in accordance with the law of the Russian Federation on security and operational and investigative activities, as well as in accordance with the penitentiary law of the Russian Federation;a

- Personal Data are processed for compulsory social insurance in accordance with federal laws on specific types of compulsory social insurance,

The processing of special categories of Personal Data in the above cases shall be terminated immediately if the reasons for which the processing was performed have been eliminated unless otherwise stipulated by federal law.

4.8. Conditions for delegating Personal Data Processing to a third party.

If the Company delegates Personal Data Processing to another person under an agreement, an essential condition thereof shall be the condition on the obligation of the specified person to ensure the confidentiality of Personal Data and the security of Personal Data during their processing.

4.9. Conditions for Personal Data Processing for the promotion of goods, works, and services.

Personal Data Processing for the market promotion of goods, works, and services by contacting a potential consumer directly using communication means shall be allowed only with the prior consent of the Personal Data Subject.

The Company shall immediately terminate the processing of Personal Data of the Personal Data Subject for the market promotion of goods, works and services by contacting a potential consumer directly using communication means under the request of the Personal Data Subject.

4.10. The Personal Data Subject shall decide to provide his/her Personal Data to the Company and agree to their processing by his/her own will and in his/her own interests, except in cases where the provision of Personal Data by the Personal Data Subject is required by law, for the protection of the foundations of the constitutional system, morality, health, rights and legitimate interests of other persons, the defense of the country and the security of the state.

Written consent of the Personal Data Subject to the processing of his/her Personal Data shall include:

- Surname, name, patronymic, address of the Personal Data Subject, number of the primary identity document, information on the date of issue of the specified document, and the issuing authority;
- Name (surname, first name, patronymic) and address of the Operator (Company) which seeks the consent of the Personal Data Subject;
- Purpose of Personal Data Processing;
- List of the pieces of Personal Data to the processing of which the consent of the Personal Data Subject is given;
- List of the actions involving Personal Data to the commission of which the consent is given and a general description of the personal data processing techniques used by the Operator (Company);
- Effective term of the consent, as well as the manner in which it may be revoked; - Handwritten signature of the Personal Data Subject.

If the Personal Data Subject lacks capacity, written consent to the processing his/her Personal Data shall be given by a legal representative of the Personal Data Subject.

In the event of the death of the Personal Data Subject, written consent to the processing his/her Personal Data shall be given by the heirs of the Personal Data Subject, unless such consent has been given by the Personal Data Subject in his/her life.

4.11. Features of the processing of Personal Data permitted for dissemination by the Personal Data Subject.

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Consent to the processing of Personal Data permitted for dissemination by the Personal Data Subject shall be issued separately from other consents of the Personal Data Subject to the processing of his/her Personal Data. Such consent shall be issued in accordance with the requirements approved by Order of the Federal Service for Supervision of Communications, Information Technology, and Mass Media No. 18 dated 24.02.2021.

5. Measures to Protect Personal Data.

5.1. Measures to ensure the security of Personal Data during their Processing;

5.1.1. When processing Personal Data, the Company shall take the necessary legal, organizational, and technical measures or ensure their adoption 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.

5.1.2. The security of Personal Data shall be achieved specifically with:

- Identifying the threats to the security of Personal Data during processing in personal data information systems;
- Applying organizational, and technical measures to ensure the security of Personal Data during their processing in personal data information systems necessary to fulfill the requirements for the protection of Personal Data;
- Applying information protection means that have passed the conformity assessment procedure in an established manner;
- Assessing the effectiveness of measures taken to ensure the security of Personal Data before commissioning the personal data information system;
- Accounting the personal data media;
- Detecting facts of unauthorized access to Personal Data and taking measures.
- Recovering the Personal Data modified or destroyed due to unauthorized access thereto;
- Establishing rules of access to the Personal Data processed in the personal data information system, as well as ensuring registration and account of all actions made with Personal Data in the personal data information system;
- Controlling the measures taken to ensure personal data security and the level of security of personal data information systems;

5.1.3. For the purposes of the Policy, threats to the security of Personal Data shall mean a set of conditions and factors that create the danger of unauthorized or accidental access to personal data which may result in destruction, modification, blocking, copying, provision, dissemination of personal data, as well as other illegal actions during their processing in the personal data information system. The level of personal data security shall mean a complex indicator that characterizes the requirements, the fulfillment of which ensures the neutralization of certain threats to the security of personal data during their processing in the personal data information system.

5.2. Protected information about the Personal Data Subject.

Protected information about the Personal Data Subject on the Website shall include data identifying the Personal Data Subject and/or providing additional information about him/her stipulated by the law and the Policy.

5.3. Protected Personal Data Objects.

5.3.1. Protected Personal Data Objects on the Website shall include:

- Objects of informatization and technical means of automated processing of information containing Personal Data;
- Information resources (databases, files, etc.) containing details on information and telecommunication systems on which Personal Data circulates, events which occurred with the

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personal objects, plans for ensuring uninterrupted operation, and procedures for transition to emergency management;

- Communication channels that are used to transmit Personal Data as informative electrical signals and physical fields;
- Removable information media using magnetic, magnetic-optical, and other means, used for the processing of Personal Data.

5.3.2. Technical information on information systems and elements of the personal data protection system to be protected shall include:

- Details on the access control system to informatization objects on which Personal Data are processed;
- Control information (configuration files, routing tables, security system settings, etc.);
- Technological information on the means of access to control systems (authentication information, access keys, and attributes, etc.)
- Characteristics of communication channels that are used to transmit Personal Data as informative electrical signals and physical fields;
- Information on the means of protection of Personal Data, their composition and structure, and the principles and technical solutions for protection;
- Service data (metadata) appearing during the operation of software, messages, and interworking protocols, as a result of processing Personal Data.

5.4. Requirements for the personal data protection system.

The personal data protection system shall comply with the requirements of Government Decree No. 1119 dated 01.11.2012 On the Approval of the Requirements for the Protection of Personal Data When Processing Them in Personal Data Information Systems.

5.4.1. The personal data protection system shall provide:

- Timely detection and prevention of unauthorized access to Personal Data and/or their transfer to persons who do not have the right to access such information;
- Prevention of influence on technical means of automated processing of Personal Data, as a result of which their functioning may be disrupted;
- Possibility of immediate recovery of Personal Data modified or destroyed due to unauthorized access to them;
- Continuous control over the level of personal data security.

5.4.2. Information protection means used in information systems shall pass the conformity assessment procedure in accordance with the established procedure.

5.5. Ways and methods of information protection in the personal data information systems of the Company shall comply with the requirements of Decree of the Federal Service for Technical and Export Control No. 21 dated 18.02.2013 On the 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;

5.6. Measures to protect information constituting Personal Data

5.6.1. Measures to protect databases containing Personal Data accepted by the Company shall include:

- Determining a list of information constituting Personal Data;
- Restricting access to information containing Personal Data by establishing procedures for handling this information and monitoring compliance with such procedure.

5.6.2. Measures to protect the confidentiality of information shall be considered reasonably sufficient if:

- Any third parties shall be prevented from accessing Personal Data without the Company's consent;

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- The use of information containing Personal Data shall be provided without violating the law on Personal Data;
 - When dealing with the User, the Operator's plan of actions shall be organized to ensure the security of information containing the User's Personal Data.
- 5.7. Personal Data may not be used for purposes contrary to the requirements of the Federal Law, the protection of the foundations of the constitutional system, morality, health, rights, and legitimate interests of others, the defense of the country, and the security of the state.

6. Procedure for Registration, Storage, and Destruction of Personal Data Media to Ensure the Security of Personal Data.

6.1. Personal data media shall be stored in a form allowing identification of a Personal Data Subject for no longer than required by the purposes of their processing.

6.2. Personal data media shall be stored under conditions that ensure safety and exclude unauthorized access to these media.

6.3. Machine-readable media that provide for the storage of Personal Data shall be issued to users a written acknowledgment of receipt (except for personal data information systems for which this requirement is not provided). Copying Personal Data to media that are not intended to store Personal Data and are not duly registered shall not be allowed.

6.4. Physical media containing Personal Data processed in the Company's personal data information systems shall be stored in the premises of the Company. If the premises where media are stored can be accessed by persons unauthorized for access to Personal Data, media shall be stored in specially equipped lockable cabinets. These premises shall be locked after employees leave them.

Premises, where personal data media are stored, shall be equipped with fire and security alarms.

6.5. Documents containing Personal Data shall be subject to destruction in the following cases:

- upon achieving the objectives of their processing or in case of loss of the need to achieve these objectives in the cases provided for in Part 4 of Article 21 of the Law on Personal Data;
- upon request of the Personal Data Subject in established cases (Part 1 of Article 14, Part 3 of Article 20 of the Law on Personal Data);
- when Personal Data have been unlawfully processed by the Operator or a person acting on behalf of the Operator, if it is impossible to ensure the legality of data processing (Part 3 of Article 21 of the Law on Personal Data);
- when the Personal Data Subject withdraws consent to their processing in cases provided for in Part 5 of Article 21 of the Law on Personal Data.

6.6. For destroying personal data media, an expert commission that takes measures to destroy personal data media shall be formed by the relevant order of the Director General of the Company.

The composition of the expert commission shall include the Chairman, the Person responsible for the processing of Personal Data, as well as members of the commission from among the employees of the Company. The number of members of the commission shall be determined based on the need, quantity, format of personal data media, the characteristics of the processing of Personal Data on these media, and other factors requiring a specialist of a certain profile in the expert commission.

The expert commission shall form a list of personal data media that are subject to destruction.

6.7. Method of destruction of documents that are not subject to storage:

- Shredding for the physical destruction of paper documents;
- Information erasure and/or physical destruction of information media for documents in electronic form;

6.8. The fact of physical destruction of documents shall be certified by the Document Destruction Act (Appendix No. 1 hereto).

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7. Control and Supervision over the Fulfillment of the Requirements of This Policy.

7.1. The fulfillment of the requirements hereof shall be controlled and supervised in accordance with the internal audit program for the state of personal data protection.

7.2. Control shall include checking compliance with the requirements of regulations on information protection, as well as assessing the validity and effectiveness of the measures taken. Control may be performed by an official responsible for ensuring the security of Personal Data, or on a contractual basis by third-party organizations that have licenses for the technical protection of confidential information.

8. Liability for Violation of the Requirements of This Policy.

8.1. An employee of the Company who has gained access to Personal Data shall keep Personal Data confidential, not transfer Personal Data to other persons, and comply with the Russian law on Personal Data.

8.2. Employees of the Company guilty of violating the procedure for handling Personal Data shall bear disciplinary, administrative, civil, or criminal liability in accordance with federal laws.

8.3. The Company may impose a disciplinary sanction on an employee guilty of violating the Personal Data handling procedure in accordance with the Labor Code of the Russian Federation.