Regulation on personal data handling

1. General Provisions

- 1.1 This Regulation on Personal Data Handling (hereinafter the Regulation) is aimed at protecting the rights and freedoms of individuals whose personal data is processed by RusMedSoft LLC, represented by director Denis Gennadievich Bugrov, acting on the basis of the Charter. (TIN 5047244940, OGRNIP 1205000096950) (hereinafter referred to as the Operator).
- 1.2 The Regulation is developed in accordance with paragraph 2, part 1, art. 1 part 1 of Article 18.1 of the Federal Law dated 27.07.2006 N 152-FZ "On Personal Data" (hereinafter the Federal Law "On Personal Data").
 - 1.3 The Regulation contains information subject to disclosure in accordance with Part 1 of Article 14 of the Federal Law

"On Personal Data" and is a publicly available document available on the Operator's website - https://mitra.tools.

- 1.4 The Operator operates at the following address: <u>630003</u>, <u>Novosibirsk</u>, <u>Chernyshevskiy Spusk</u>, <u>d. 7A</u>, <u>office</u>. <u>6</u>.
- 1.5 <u>Nikita Sergeevich Olshevsky</u> was appointed as the person responsible for organization of personal data processing.
 - 1.6 Operator contact information:
 - Website address: https://mitra.tools
- 1.7 These Regulations apply to all information posted on the website at https://mitra.tools (hereinafter referred to as the Website), information about the User, as well as personal data of the Operator's employees, its contractors and other subjects of personal data, information about which is processed by the Operator.
- 1.8 Any use of the Site means the User's unconditional <u>consent</u> to this Regulation and the terms of processing his/her personal data specified therein. In case of disagreement with these conditions, the User shall refrain from using the Site and in no case provide the Operator with his/her personal data.

2. Terms and definitions used

- 2.1 **personal data** any information relating directly or indirectly to a certain or definable natural person (subject of personal data);
- 2.2 **operator** a natural person, alone or together with other persons organizing and (or) carrying out processing of personal data, as well as determining the purposes of personal data processing, composition of personal data subject to processing, actions (operations) performed with personal data;
- 2.3 **processing of personal data** any action (operation) or set of actions (operations) performed with or without the use of automation means with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer

(dissemination, provision, access), depersonalization, blocking, deletion, destruction of personal data;

- 2.4 **provision of personal data** actions aimed at disclosure of personal data to a certain person or a certain circle of persons;
- 2.5 **destruction of personal data** 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 material carriers of personal data are destroyed;
- 2.6 **blocking of personal data** temporary cessation of personal data processing (except for cases when processing is necessary to clarify personal data);
- 2.7. **user** any physical person who is on the Website and performs any actions on it, including filling out a feedback form or otherwise entering into a relationship with the Operator (e-mail, etc.). The User is the subject of personal data.

3. Purposes of personal data processing

- 3.1 The Operator processes personal data for the following purposes:
- 3.1.1 for the execution of a contract to which the personal data subject is a party, beneficiary or guarantor;
- 3.1.2 to conclude a contract at the initiative of the personal data subject or the contract, for which the subject personal data data will personal data subject will be beneficiary or guarantor;
 - 3.1.3 for the operation of the Site:
- 3.1.4 to keep statistics of the Site visits, to maintain and improve services and sections of the Site, as well as to develop new services and sections of the Site;
- 3.1.5 to achieve the goals stipulated by the international treaty of the Russian Federation Federation or by law, for implementation and fulfillment of the functions, powers and duties assigned to the Operator by the legislation of the Russian Federation.

4. Legal basis of personal data processing

- 4.1 The legal basis for the processing of personal data is:
- 4.1.1 The legislation of the Russian Federation in the field of personal data is based on the Constitution of the Russian Federation and international treaties of the Russian Federation and consists of the Federal Law "On Personal Data" and other federal laws determining the cases and peculiarities of personal data processing;
- 4.1.2 <u>Consent to the processing of personal data</u>, which the User provides by accepting this Regulation or signing it in writing when entering into contracts with the Operator;
 - 4.1.3 These Regulations.

5. Categories of personal data subjects and composition of personal data

- 5.1 The categories of personal data subjects data subjects, whose personal whose personal data are processed by the Operator include:
 - 5.1.1 individuals having labor and civil law relations with the Operator;

- 5.1.2 individuals having labor and civil law relations with the Operator's counterparties;
- 5.1.3 personal data subjects using the feedback form on the Operator's website www.easycleaning.ru;
- 5.2 For all categories of personal data subjects, personal data are processed by the Operator within the framework of legal relations with the Operator regulated by the Civil Code of the Russian Federation and the Labor Code of the Russian Federation
- 5.3 For all categories of personal data subjects, personal data is processed by the Operator with the consent of the personal data subjects, provided either in writing or by performing conclusory actions on the Website.
 - 5.4 The Operator processes the following personal data of personal data subjects:
 - 5.4.1 Last name, first name, middle name;
 - 5.4.2 Contact phone number;
 - 5.4.3 Email;
- 5.4.4 Data automatically transmitted to the Operator in the process of visiting and using the Website **https://mitra.tools** using the software installed on the User's device, including: IP address, cookie information, information about the User's browser (or other program with which the site is accessed), access time, address of the requested page and others.
- 5.5 The Operator may process other personal data directly necessary to fulfill the purposes of personal data processing.

6. Periods of personal data processing and storage

6.1 The operator processes and stores personal data until the operator achieves the objectives of personal data processing or until it is no longer necessary to achieve these objectives.

7. Information on personal data processing

- 7.1 The Operator shall process personal data on a lawful and fair basis in order to fulfill the functions, powers and duties assigned by the legislation, exercise the rights and legitimate interests of the Operator, the Operator's employees and third parties.
 - 7.2 The Operator obtains personal data directly from the subjects of personal data.
- 7.3 The Operator processes personal data by automated and non-automated methods, with or without the use of computer facilities.
- 7.4 Personal data processing activities include collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion and destruction.
- 7.5 Databases of information containing personal data of citizens of the Russian Federation are located on the territory of the Russian Federation.

8. Information on personal data security

- 8.1 The Operator shall appoint a person responsible for the organization of personal data processing to perform the duties stipulated by the Federal Law "On Personal Data" and regulatory legal acts adopted in accordance with it.
- 8.2 The Operator applies a set of legal, organizational and technical measures to ensure the security of personal data to ensure the confidentiality of personal data and their protection from unlawful actions:

provides unrestricted access to the Regulations, a copy of which is available on the Operator's website at https://mitra.tools/media/files/4cd2621f-a75b-4a33-bd51-d5878f1d34ac.pdf;

- 8.2.1 develops local acts in pursuance of the Regulations;
- 8.2.2 familiarizes its employees with the provisions of the legislation on personal data, as well as with the Regulation and other local acts that are adopted for its implementation;
- 8.2.3 allows employees to access personal data processed in the Operator's information system, as well as their tangible carriers only for the performance of labor duties;
- 8.2.4 establishes rules of access to personal data processed in the Operator's information system, as well as ensures registration and record keeping of all actions with them;
- 8.2.5 assesses the harm that may be caused to personal data subjects in case of violation of the Federal Law "On Personal Data", the correlation between the said harm and the measures taken by the Operator to ensure fulfillment of obligations stipulated by the said federal law;
- 8.2.6 determines security threats to personal data during their processing in the Operator's information system;
- 8.2.7 applies organizational and technical measures and uses information protection means necessary to achieve the established level of personal data protection;
- 8.2.8 performs detection of facts of unauthorized access to personal data and takes response measures, including recovery of personal data modified or destroyed due to unauthorized access to them;
- 8.2.9 assesses the effectiveness of the measures taken to ensure personal data security before the Operator's information system is put into operation;
- 8.2.10 performs internal control over compliance of personal data processing with the Federal Law "On Personal Data", regulatory legal acts adopted in accordance with them, personal data protection requirements, the Regulation and other local acts, including control over measures taken to ensure personal data security and their level of protection during processing in the Operator's information system.

9. Rights of personal data subjects

- 9.1 The subject of personal data has the right to:
- 9.1.1 to receive personal data relating to the subject and information concerning their processing;
- 9.1.2 to clarify, block or destroy his/her personal data if they are incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;

- 9.1.3 to revoke his/her consent to the processing of personal data;
- 9.1.4 to protect their rights and legitimate interests, including compensation for losses and compensation for moral harm in court;
- 9.1.5 to appeal against actions or omissions of the Operator to the authorized body on protection of the rights of personal data subjects or in court.
- 9.2 To exercise their rights and legitimate interests, personal data subjects have the right to contact the Operator or send a request in person or with the help of a representative, including by e-mail.
- 9.3 The request shall contain the information specified in paragraphs 3, 7 of Article 14 of the Federal Law "On Personal Data" and shall be sent to the address specified in clause 1.4 of the Regulation or to the e-mail address specified in clause 1.6 of the Regulation.

10. Final provisions

- 10.1. The Operator has the right to make changes to these Regulations without the User's consent.
 - 10.2. The new edition of the Regulations shall come into force from the moment of its publication on the Website,

unless otherwise provided for in the new version of the Regulations.

- 10.3. All suggestions or questions regarding these Regulations should be sent to the e-mail address specified in clause 1.6. of the Regulations.
- 10.4. The current Regulations are available at on the Website page at the address: https://mitra.tools/media/files/4cd2621f-a75b-4a33-bd51-d5878f1d34ac.pdf
 An integral part of this Regulation is the Consent to the Processing of Personal Data posted on the Website at: https://mitra.tools/media/files/4cd2621f-a75b-4a33-bd51-d5878f1d34ac.pdf
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