

Personal Data Handling Statement

General Provisions

1.1 This Regulation on Work with Personal Data (hereinafter referred to as the Regulation) is aimed at protecting the rights and freedoms of individuals whose personal data is processed by RusMedSoft Limited Liability Company (TIN: 5047244940, OGRN: 1205000096950) (hereinafter referred to as the Operator).

1.2 The Regulation was developed in accordance with paragraph 2 of part 1 of Article 18.1 of the Federal Law of 27.07.2006 N 152-FZ "On Personal Data" (hereinafter referred to as 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 posted on the Operator's website – <https://mitra.tools/en/> (hereinafter referred to as the Website).

1.4 The operator operates at the address: 141700, Moscow Region, Dolgoprudny, Novy Boulevard, 15, apt. 563.

1.5 Denis Gennadievich Bugrov has been appointed responsible for organizing the processing of personal data (contact details are specified in clause 1.6.).

1.6 Contact details of the operator:

- Phone: +7 (499) 399-35-19

- Email: info@mitra.tools

- Website address: <https://mitra.tools/en/>

1.7 This Regulation applies to all information posted on the Website, information about the User, as well as to personal data of the Operator's employees, its counterparties and other personal data subjects, information about which is processed by the Operator.

1.8 Any use of the Website means the User's unconditional Consent to this Regulation and the terms of processing of his personal data specified therein.

In case of disagreement with these conditions, the User must refrain from using the Website in any form and in no case provide the Operator with his personal data.

2. Terms and definitions used

2.1 **personal data** - any information relating directly or indirectly to a specific or identifiable individual (personal data subject);

2.2 **Operator** – an individual who, independently or jointly with other persons, organizes and (or) carries out the processing of personal data, as well as determines the purposes of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data;

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

2.4 **provision of personal data** - actions aimed at disclosing personal data to a certain person or a certain group 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 tangible media of personal data are destroyed;

2.6 **blocking of personal data** - temporary suspension of personal data processing (except for cases where processing is necessary to clarify personal data);

2.7 **User** – any individual who is on the Website and performs any actions on it, including filling out a feedback form or otherwise entering into relations 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 performance of a contract to which the personal data subject is a party or beneficiary or guarantor;
- 3.1.2 to conclude an agreement at the initiative of the personal data subject or an agreement under which the personal data subject will be a beneficiary or guarantor;
- 3.1.3 for the functioning of the Website;
- 3.1.4 to maintain statistics of visits to the Website, to maintain the performance and improve the services and sections of the Website, as well as to develop new services and sections of the Website;
- 3.1.5 to achieve the goals provided for by an international treaty of the Russian Federation or the law, to exercise and perform the functions, powers and obligations assigned to the Operator by the legislation of the Russian Federation.
- 3.1.6 to process incoming requests from individuals for the purpose of providing services (performing work) by the Operator;
- 3.1.7 to promote the Operator's works and services by making direct contacts with the User using means of communication.

4. Legal basis for the processing of personal data

- 4.1 The legal basis for the processing of personal data is:
 - 4.1.1 Legislation of the Russian Federation in the field of personal data, based on the Constitution of the Russian Federation and international treaties of the Russian Federation and consisting of the Federal Law "On Personal Data" and other federal laws defining the cases and features of personal data processing;
 - 4.1.2 Consent to the processing of personal data that the User provides when using the Website, feedback forms on the Website;
 - 4.1.3 Consent to the processing of personal data, which the User provides by sending written correspondence to the postal addresses of the Operator, phone numbers, e-mail addresses specified on the Website, personally, as well as by any other means;
 - 4.1.4 Civil law contracts concluded by the Operator with counterparties, annexes to these contracts.

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

- 5.1 The categories of personal data subjects whose personal data are processed by the Operator include:
 - 5.1.1 individuals who are in labor and civil law relations with the Operator;
 - 5.1.2 individuals who are in 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;
- 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 are processed by the Operator, with the consent of personal data subjects, provided either in writing or when performing implicative actions on the Website.
- 5.4 The personal data processed by the operator is not special or biometric, and is not publicly available.
- 5.5 The Operator processes the following personal data of the User:
 - 5.5.1 Last name, first name, patronymic;
 - 5.5.2 Contact phone number;
 - 5.5.3 E-mail;
 - 5.5.4 Data automatically transmitted to the Operator in the process of visiting and using the Website – cookies. The procedure for processing such data is established in the Cookie Policy (Appendix No2 to the Regulation).
 - 5.5.5 Data of metric systems (statistical data). In relation to such data, the User provides a separate consent to the processing of his personal data in accordance with Appendix No3 to the Regulation.
- 5.6 The Operator may process other personal data that are directly necessary to fulfill the purposes of personal data processing.
- 5.7 Personal data of persons who are in labor and civil law relations and are not Users are processed in accordance with the applicable local regulations of the Operator.

6. Terms of processing and storage of personal data

- 6.1 The Operator processes and stores personal data until the Operator achieves the purposes of personal data processing or until it is no longer necessary to achieve these goals.

7. Information on the processing of personal data

7.1 The Operator processes personal data on a legal and fair basis to perform the functions, powers and obligations assigned by law, to exercise the rights and legitimate interests of the Operator, the Operator's employees and third parties.

7.2 The Operator receives personal data directly from personal data subjects.

7.3 The Operator processes personal data in automated and non-automated ways, with and without the use of computer technology.

7.4 Actions for the processing of personal data include collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, 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.

7.6 Storage of personal data recorded on paper is carried out in accordance with Federal Law No125-FZ "On Archiving in the Russian Federation" and other regulatory legal acts in the field of archiving and archival storage.

7.7 If the User or his representative withdraws consent to the processing of personal data, the Operator has the right to continue processing personal data without the consent of the User if there are grounds specified in the Federal Law "On Personal Data".

8. Information on the security of personal data

8.1 The Operator appoints a person responsible for organizing the processing of personal data to perform the duties provided for by the Federal Law "On Personal Data" and the regulations 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 illegal actions:

8.2.1 provides unrestricted access to the Regulations, which are permanently posted on the Website: <https://mitra.tools/media/policy-en.pdf>;

8.2.2 in pursuance of the Regulation, develops local acts;

8.2.3 familiarize 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;

8.2.4 admits employees to personal data processed in the Operator's information system, as well as to their material carriers only for the performance of work duties;

8.2.5 establishes the rules for access to personal data processed in the Operator's information system, as well as ensures the registration and accounting of all actions with them;

8.2.6 assesses the damage that may be caused to personal data subjects in the event of a violation of the Federal Law "On Personal Data", the ratio of this damage and the measures taken by the Operator aimed at ensuring the fulfillment of the obligations provided for by the said federal law;

8.2.7 identify threats to the security of personal data when they are processed in the Operator's information system;

8.2.8 applies organizational and technical measures and uses information protection tools necessary to achieve the established level of protection of personal data;

8.2.9 detects unauthorized access to personal data and takes response measures, including the recovery of personal data modified or destroyed as a result of unauthorized access to them;

8.2.10 assesses the effectiveness of measures taken to ensure the security of personal data before the commissioning of the Operator's information system;

8.2.11 carries out internal control over the compliance of personal data processing with the Federal Law "On Personal Data", regulations adopted in accordance with them, the requirements for the protection of personal data, the Regulation and other local acts, including control over the measures taken to ensure the security of personal data and their level of protection when processed in the Operator's information system.

9. Rights of personal data subjects

9.1 The personal data subject has the right to:

9.1.1 to receive personal data relating to this subject and information regarding their processing;

9.1.2 to clarify, block or destroy his/her personal data if they are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing;

- 9.1.3 to withdraw 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 damage in court;
- 9.1.5 to appeal against the actions or inactions of the Operator to the authorized body for the 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 must contain the information specified in Parts 3, 7 of Article 14 of the Federal Law "On Personal Data" and must be sent to the address specified in paragraph 1.4 of the Regulation, or to the e-mail address specified in paragraph 1.6. of the Regulation.

10. Final provisions

- 10.1 The Operator has the right to make changes to this Statement without the consent or separate notice of the User.
- 10.2 The new version of the Regulation comes into force from the moment of its publication on the Website, unless otherwise provided by the new version of the Regulation.
- 10.3 All suggestions or questions regarding this Regulation should be sent to the e-mail address specified in clause 1.6. of the Regulations.
- 10.4 The current Regulations are posted on the Website page: <https://mitra.tools/media/policy-en.pdf>.
- 10.5 An integral part of this Regulation is:
 - 10.5.1 Appendix No1 - Consent to the processing of personal data posted on the Website: <https://mitra.tools/media/agreement-en.pdf>.
 - 10.5.2 Appendix No2 - Cookie Policy posted on the Website: <https://mitra.tools/media/cookies-en.pdf>.
 - 10.5.3 Appendix No3 - Consent to the processing of personal data collected by metric programs, posted on the Website: <https://mitra.tools/media/metrika-en.pdf>.