# PERSONAL DATA PROCESSING POLICY

### 1. GENERAL PROVISIONS

- 1.1.This Personal data processing policy (hereinafter referred to as the Policy) has been compiled in accordance with the Russian Federation Federal Law of July 27, 2006 No. 152-FZ "On Personal Data", and it defines the procedure of personal data processing and the measures aimed at ensuring personal data safety of Applied Technologies Private Limited Company (Applied Technologies, Ltd, hereinafter referred to as the Operator).
- 1.2. The Operator shall process personal data according to the principles and rules established by the Russian Federation Federal Law of July 27, 2006 No. 152-FZ "On Personal Data". The key condition of the personal data processing by the Operator is the observance of rights and freedoms of the person and of the citizen.
- 1.3. This Policy shall cover all information that may be received by the Operator about the visitors of Applied Technologies, Ltd website (hereinafter the Users, the Website).
- 1.4. This Policy shall cover all the processes related to collection, recording, classification, accumulation, storage, improvement (updating, modification), retrieval, use, transmission (provision, access), blocking, deletion, destruction of personal data with the use of automation means.
- 1.5. The Operator shall not control and shall not be responsible for the third parties' websites that might be visited by the User by following the links available at the Operator's Website. The third parties' websites may be covered by their own personal data processing policies, and other personal data may be requested or collected.
- 1.6.By using the Website and providing the Operator with the information necessary for initiating further interaction, you grant your full consent to use this information in accordance with this Policy.
- 2. BASIC TERMS USED IN THE POLICY
- 2.1.Automated processing of personal data personal data processing by means of computing tools.
- 2.2.Personal data blocking temporary termination of personal data processing (except for cases when the processing is required to specify personal data).
- 2.3.Website a complex of graphic and information materials, as well as software applications for electronic computer machines and databases, ensuring accessibility thereof on the Internet at the network address registered by the Operator.
- 2.4.Personal data information system a complex of personal data stored in databases, as well as information technologies and technical means ensuring the processing thereof.
- 2.5.Anonymization of personal data operations resulting in the impossibility to associate personal data with a particular User or other personal data subject without additional information.
- 2.6.Personal data processing any activity (operation) or a complex of activities (operations) performed either with the use of automation means or without them in relation to personal data, including collection, recording, classification, accumulation, storage, improvement (updating, modification), retrieval, use, transmission (distribution, provision, access), anonymization, blocking, deletion, and destruction of personal data.
- 2.7.Operator a state agency, municipal authority, legal entity, or individual who independently or in cooperation with other entities organizes and/or processes personal data, determines the purposes of personal data processing, the body of personal data that shall be processed, and actions (operations) that are taken in regard to personal data.

- 2.8.Personal data any information that refers either directly or indirectly to a particular User of the Website, or to a User that is being identified.
- 2.9.User any visitor of the Website.
- 2.10. Provision of personal data actions aimed at making the data available to a certain person or a certain group of persons.
- 2.11. Distribution of personal data actions aimed at making the data available to indefinite range of persons (transmission of personal data) or at getting acquainted with personal data of unlimited range of persons, including the public disclosure of personal data in mass media, publication in telecommunication networks or providing access to personal data in any other way.
- 2.12. Trans-border transfer of personal data a transfer of personal data abroad to a foreign state to either a foreign state's government authority, foreign individual, or foreign legal entity.
- 2.13. Destruction of personal data any actions aimed at destructing personal data stored in the database completely and without a possibility to restore this personal data's contents, and (or) actions aimed at the physical destruction of the physical media on which personal data is stored.
- 3. USERS' PERSONAL DATA RECEIVED AND PROCESSED BY THE OPERATOR
- 3.1.In terms of this Policy the term "User's personal data" shall mean personal data provided by the User regarding himself/herself when using the Website and initiating interaction with Applied Technologies, Ltd by means of the Website resources (the information mandatory for interaction is clearly defined):
- 3.1.1. For the Website visitors persons browsing the Website and initiating any interaction by means of the Website resources, except for initiating the consideration of employment issues, such data shall include: name, information on the represented company, contact phone number, email address.
- 3.1.2. For applicants for vacant positions persons looking for a job and initiating consideration of possible employment, such data shall include: surname, first name, patronymic name, date of birth, residence address, home phone number, office phone number, mobile phone number, email address, marital status, children record, information about education/professional upgrade (training period, education institution, division/area of specialty, acquired profession according to diploma, mode of study), information regarding certificates, work experience (period of employment, corporate profile of organization, position, basic duties), information on software products and programming languages knowledge, foreign language skills, information on professional skills and personal attributes, city of residence, job of interest, preferred work schedule, compensation rate, form of payment for labor, hobbies.
- 3.1.3. Other User-related information, collection and/or submitting of which is required by Applied Technologies, Ltd for a specific interaction. This information shall be additionally specified by Users in their messages in any format.
- 3.2.Also the collection and processing of anonymized data about users is performed at the Website (including the usage of "cookie" files) by means of the Internet statistics services (Yandex.Metrika, Google Analytics, and others).
- 3.3. If the User's personal data is incorrect, the User can update the data by sending a corresponding notification to the Operator at <u>info@appliedtech.ru</u> marked with the text "Personal data update".
- 4. PURPOSES OF PERSONAL DATA PROCESSING
- 4.1. The Operator shall process only the personal data that is required to ensure interaction with the Website Users and to improve the interaction quality.

- 4.2. The Users' personal data shall be used by Applied Technologies, Ltd for the following purposes:
- 4.2.1. Party identification within the frame of interaction.
- 4.2.2. CVs collection and selection of candidates for vacant positions.
- 4.2.3. Improvement of existing services and development of new ones.
- 4.2.4. Granting access to the Website services.
- 4.2.5. Processing of the Website users' queries. Informing users by sending emails.
- 4.2.6. Performance and/or fulfillment of functions, authorities and liabilities, entrusted to Applied Technologies, Ltd by the Russian Federation legislation.
- 4.3.Your consent has an unlimited period of validity; however, the User shall be entitled to withdraw his/her consent by sending a notification to the Operator at info@appliedtech.ru marked with the text "Personal data processing consent withdrawal", or by sending a written notification to the address: 1-2 floor, building A9, Komsomolsky avenue, 29, Chelyabinsk, 454112, the Russian Federation, marked with the text "Personal data processing consent withdrawal"; the withdrawal of your consent to process personal data shall result in destruction of all the records that contain your personal data from the personal data processing systems of the Operator, which may make interaction with Applied Technologies, Ltd impossible. Your personal data shall be deleted by the Operator within 10 (Ten) days from the date of the notification receipt.
- 4.4. The Operator shall be entitled to send information about new vacancies, services, special offers, and events to the User. The User shall be entitled to waive to receive such messages by sending a notification to the Operator at <u>info@appliedtech.ru</u> marked with the text "Waiver of notice", or by sending a written notification to the address: 1-2 floor, building A9, Komsomolsky avenue, 29, Chelyabinsk, 454112, the Russian Federation, to Applied Technologies, Ltd, marked with the text "Waiver of notice".
- 4.5. Anonymized personal data that is collected by means of the Internet statistics services shall be used for collecting information regarding users' actions on the Website, and for improving the Website's quality and content.
- 4.6.The Operator shall not make decisions causing legal consequences in relation to the Users or otherwise impacting their rights and legal interests, based exclusively on automated processing of personal data.

# 5. LEGISLATIVE GROUNDS FOR PERSONAL DATA PROCESSING

- 5.1. The Operator shall process the User's personal data only if such data is provided and/or sent by the User himself/herself via dedicated forms on the Website, or by sending emails at <u>info@appliedtech.ru</u>. By filling a respective form and/or by sending one's personal data to the Operator, the User acknowledges the consent with this Policy.
- 5.2. The Operator shall process anonymized data regarding the User in cases when it is allowed in the User's browser settings (the "cookie" files saving and the JavaSscript technology are enabled).
- 5.3. The User's personal data provided to the Operator shall be considered unreliable and may be blocked until the receipt of the User's consent to process personal data from the User or his/her legal representative in any form, defined by the Operator in addition to the form on the Website.
- 5.4. The Operator shall ensure recording, classification, accumulation, storage, improvement (updating, modification), retrieval of personal data with the use of databases located on the territory of the Russian Federation.
- 6. USER'S PERSONAL DATA TRANSFER TO THIRD PARTIES
- 6.1. The Operator shall not assign any operations related to personal data processing to third parties.

- 6.2. The User's personal data shall be kept confidential, except for the cases when the access to the processed personal data is granted to unlimited number of persons by the User or upon the User's request.
- 6.3. The User's personal data, obtained via the Website resources, shall never be transmitted to any third parties, except for cases related to execution of the applicable legislation.
- 6.4. The Operator shall not perform trans-border transfer of the Users' personal data based exclusively on automated processing of personal data.

### 7. MEASURES TO ENSURE USERS' PERSONAL DATA PROTECTION

- 7.1. The security of personal data, processed by the Operator, shall be ensured by the implementation of legal, organizational, and technical measures, required to fulfill the requirements of the current personal data protection legislation, in particular:
- 7.1.1. The person responsible for the personal data processing organization is assigned.
- 7.1.2. The rules of personal data processing and security, as well as the procedures aimed at prevention and detection of the violations of the legislation of the Russian Federation, and the corresponding elimination of such violations are established.
- 7.1.3. The technical measures on ensuring the personal data security are applied.
- 7.1.4. The rules of access to personal data that is processed in the personal data information systems are established.
- 7.1.5. The rules of backup and personal data recovery are established.
- 7.2. The User shall be entitled to obtain information regarding the processing of his/her personal data by Applied Technologies, Ltd. For this purpose, the User shall send a written request to the address: 1-2 floor, building A9, Komsomolsky avenue, 29, Chelyabinsk, 454112, the Russian Federation, marked with the text "Request for information on personal data processing procedure".

### 8. FINAL PROVISIONS

- 8.1.For some particular activities the Operator shall be entitled to publish additional provisions to this Policy.
- 8.2. This Policy shall be updated if any changes are introduced in the Russian Federation personal data legislation.
- 8.3. This Policy shall be mandatory read and observed by all persons having access to personal data processing within Applied Technologies, Ltd, as well as by persons participating in personal data processing and safety assurance processes within Applied Technologies, Ltd.
- 8.4.All suggestions or questions regarding this Policy shall be delivered to Applied Technologies, Ltd by phone +7 (351) 225-29-53 or by sending an mail at info@appliedtech.ru.