

**APPROVED BY**

KIRA & ROCK LLC

August 1<sup>st</sup>, 2021

**PERSONAL DATA PROCESSING POLICY**

Kazan, 2021

## **What is this document about?**

This Personal Data Processing Policy (hereinafter referred to as the Policy and the Personal Data respectively) has been developed in accordance with Federal Law No. 152-ФЗ "On Personal Data" (hereinafter referred to as the Law) dated July 27, 2006, and determines the Personal Data processing principles established at kirarock.team represented by KIRA & ROCK LLC (hereinafter referred to as KIRA & ROCK or We), and is considered to be an approved local act of KIRA & ROCK.

## **Where is the Policy applied?**

The Policy is applied directly in the business activities of KIRA & ROCK, on the websites that are owned and/or administered by KIRA & ROCK, and in other cases where KIRA & ROCK has to process the Personal Data of third parties.

This Policy establishes the obligations of KIRA & ROCK with respect to the Personal Data processing and security, including confidentiality protection of the Personal Data submitted to KIRA & ROCK by the User while completing a work request form and submitting a request by email, as well as

We collect information which has been deliberately submitted by the User to KIRA & ROCK while using the Website.

The Personal Data are submitted by the User while submitting a work request form to KIRA & ROCK and include the following information:

- Name;
- Name of the company being represented;
- Contact details (email address, Skype login, phone number).

Technical information automatically collected by the Website software during its visit by the User includes:

- IP address;
- Cookies;
- Browser information;
- Information about the device type (mobile or PC);
- Access time.

## **What terms are used in the Policy?**

The Policy uses the terms established by Federal Law "On Personal Data", as well as others, including commonly used terms that can be applied to the Policy.

## **What are the general principles of the Personal Data processing?**

- The Personal Data processing is limited to achievement of specific, predefined and legitimate purposes. We do not process the Personal Data incompatible with the Personal Data collection purposes.
- We prevent integration of the databases containing the Personal Data processed for incompatible purposes.

- We process only those Personal Data that meet the purposes of their processing.
- Content and amount of the processed Personal Data meet the specified purposes of processing. The processed Personal Data are not redundant in relation to the specified purposes of their processing.
- Accuracy, adequacy and, if necessary, relevance of the Personal Data in relation to the Personal Data processing purposes are ensured during their processing. We use all reasonable efforts to remove or clarify the incomplete or inaccurate Personal Data.
- We retain the Personal Data in the form which makes it possible to determine the Personal Data subject for no longer than it is required by the Personal Data processing purposes, unless the Personal Data retention period is set by a federal law or a contract to which the

Personal Data subject is a party, beneficiary or guarantor.

- Unless otherwise stipulated by the Law, we destroy or depersonalize the Personal Data when the processing purposes are achieved or achievement of these purposes is no longer required.

### **What are the grounds for the Personal Data processing?**

We process the Personal Data only:

- If there is a consent of the Personal Data subject;
- In cases where the Personal Data processing is required to:
  - ■ Achieve the purposes stipulated by an international treaty of the Russian Federation or a law, to exercise and perform functions, powers and obligations imposed by the legislation of the Russian Federation on KIRA & ROCK;
  - ■ Execute a contract to which the Personal Data subject is a party (beneficiary or guarantor), and to conclude a contract on the initiative of the Personal Data subject or a contract under which the Personal Data subject will be a beneficiary or guarantor;
  - ■ Exercise rights and legitimate interests of KIRA & ROCK or third parties provided that the rights and freedoms of the Personal Data subject are not violated.

### **What are the Personal Data processing purposes and the Personal Data list?**

The specific Personal Data list, as well as processing purposes and conditions are established in the Personal Data processing consent and shall not contradict this Policy and the Law. Each Personal Data processing consent given on behalf of KIRA & ROCK is an integral part of this Policy.

### **How are the Personal Data processed?**

While processing the Personal Data, we can perform any and all actions with automated facilities or without them, including collection, recording, systematization, accumulation, retention, clarification (updating, modification),

extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction.

KIRA & ROCK does not process the Personal Data in a fully automated way, and does not deal with special categories of the Personal Data and biometric Personal Data.

Sometimes we can obtain the Personal Data cross-border transfer consent. Such transfer of the Personal Data is carried out only to the countries that provide adequate protection of the rights of the Personal Data subjects and/or to organizations specified in the corresponding Personal Data processing consent.

In addition, we shall be entitled, at our own discretion, to transfer the User's Personal Data to any third parties for performance of the work in accordance with received requests.

### **What are the retention periods and requirements to the Personal Data destruction?**

The Personal Data retention periods depend on the processed data composition and are specified in the corresponding Personal Data processing consent.

In any case, the processed Personal Data shall be destroyed upon:

- Achievement of the processing purposes (or if such achievement is no longer required);
- Receipt of a corresponding inquiry from the Personal Data subject in accordance with the procedure established by the Law;
- Receipt of a legitimate claim from the authorized body;
- Expiration of the established Personal Data retention periods.

### **What measures are taken to process and protect the Personal Data?**

- We appoint employees responsible for the Personal Data processing arrangement;
- We define, publish and update the Personal Data Processing Policy, and, if necessary, issue and adopt local acts to ensure safe processing of the Personal Data or eliminate negative

consequences of such processing.

- If necessary, we implement legal, organizational and technical measures to provide the Personal Data security, as well as take other steps aimed at ensuring the Personal Data processing in accordance with the Law and the Policy.

### **What are the rights of the Personal Data subject?**

KIRA & ROCK guarantees observance of the rights of the Personal Data subjects established by the Law and the Policy. The Personal Data subject can obtain comprehensive information about the Personal Data processing and security by sending an official inquiry to KIRA & ROCK in accordance with the Law.