

APPENDIX 1

to Order No. 25-ОП/25 dated 28 April 2025
Juicy Labs LLC

APPROVED by

Order No. 25-ОП/25 dated 28 April 2025
Juicy Labs LLC

JUICY LABS LIMITED LIABILITY COMPANY**PERSONAL DATA PROCESSING
POLICY**

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TERMS AND DEFINITIONS

Access to Personal Data means the possibility of obtaining and using Personal Data.

Anonymisation of Personal Data means actions making it impossible to determine, without the use of additional information, the belonging of Personal Data to a specific Data Subject.

Automated Personal Data Processing means Personal Data Processing using computer technology.

Blocking of Personal Data means temporary suspension of Personal Data Processing (except where processing is necessary for clarification of Personal Data).

Cross-Border Transfer of Personal Data means any transfer of Personal Data to the territory of a foreign state, to a governmental authority of a foreign state, a foreign individual, or a foreign legal entity.

Destruction of Personal Data means any actions making it impossible to restore the content of Personal Data in the Personal Data Information System and/or leading to the destruction of the tangible media with Personal Data.

Dissemination of Personal Data means actions aimed at disclosing Personal Data to the general public.

Mixed Personal Data Processing means a combination of automated and non-automated methods for Personal Data Processing.

Non-Automated Personal Data Processing means Personal Data Processing without using computer technology.

Personal Data mean any information related to a directly or indirectly identified or identifiable individual (Personal Data Subject or Data Subject).

Personal Data Information System means a set of Personal Data contained in databases, and the information technologies and technical resources that ensure their processing.

Personal Data Operator (or Operator) means a governmental authority, municipal authority, legal entity or individual who independently or jointly with other persons organises and/or carries out the Personal Data Processing, and determines the purposes of the Personal Data Processing, the composition of the Personal Data to be processed, and the actions (operations) performed with Personal Data. The Personal Data Operator, as used herein, means Juicy Labs Limited Liability Company (hereinafter referred to as Juicy Labs LLC).

Personal Data Permitted by the Data Subject for Dissemination mean any Personal Data, access to which is granted to the general public by the Data Subject by giving consent to the Personal Data Processing permitted by the Data Subject for dissemination in the manner provided for by Federal Law of the Russian Federation No. 152-FZ On Personal Data of 27 July 2006.

Personal Data Processing means any action (operation) or set of actions (operations) performed with Personal Data, whether or not by automated means, such as collection, recording, structuring, accumulation, storage, clarification (update, modification), retrieval, use, transfer (dissemination, provision, access), anonymisation, blocking, deletion, destruction of Personal Data.

Provision of Personal Data means any actions aimed at disclosing Personal Data to a specific person or a specific group of persons.

1 GENERAL PROVISIONS

1.1 Purpose

This document “Juicy Labs Limited Liability Company. Personal Data Processing Policy” (hereinafter referred to as the Policy) defines the basic principles, purposes, conditions, and methods for Personal Data Processing, categories of Personal Data Subjects and the composition of Personal Data being processed at Juicy Labs LLC, the actions (operations) performed with Personal Data, the rights of Personal Data Subjects, and contains information on the requirements being implemented to ensure the security of Personal Data.

This Policy has been developed in accordance with the Constitution of the Russian Federation, the Labour Code of the Russian Federation, Federal Law No. 152-FZ On Personal Data of 27 July 2006 and other regulations of the Russian Federation in the field of Personal Data.

This Policy has been developed for the purpose of complying with the requirements of Article 18.1 of Federal Law of the Russian Federation No. 152-FZ On Personal Data of 27 July 2006.

Local regulations and other documents regulating the Personal Data Processing at Juicy Labs LLC and ensuring the security of Personal Data at Juicy Labs LLC, including their processing in the Personal Data Information Systems, shall be developed taking into account the provisions of this Policy.

2 PRINCIPLES, PURPOSES AND LEGAL GROUNDS FOR THE PERSONAL DATA PROCESSING

2.1 Principles of Personal Data Processing

Juicy Labs LLC, being a Personal Data Operator, shall process the Personal Data of Data Subjects in accordance with the following principles:

- The Personal Data Processing at Juicy Labs LLC shall be lawful and fair.
- The Personal Data Processing at Juicy Labs LLC shall be limited to achieving specific, predetermined and legitimate purposes.
- Juicy Labs LLC shall not process Personal Data that are incompatible with the purpose of Personal Data collection.
- Juicy Labs LLC shall not merge the databases containing Personal Data for which processing purposes are incompatible with each other.
- Juicy Labs LLC may process only the Personal Data that meet the purposes of their processing.
- The content and scope of the Personal Data processed at Juicy Labs LLC shall correspond to the stated purposes of processing. The Personal Data processed at Juicy Labs LLC shall not be excessive in relation to the stated purposes of their processing.
- When processing Personal Data at Juicy Labs LLC, the accuracy of Personal Data, their sufficiency, and, where necessary, their relevance in relation to the purposes of Personal Data Processing shall be ensured. Juicy Labs LLC shall take the necessary measures (or ensure that such measures are taken) to delete or clarify incomplete or inaccurate Personal Data.
- Juicy Labs LLC shall store Personal Data in a form that allows to identify the Data Subject, no longer than required by the purposes of Personal Data Processing, unless the period of storage of Personal Data is not established by a federal law or a contract to which the Personal Data Subject is a party, beneficiary, or guarantor.
- The Personal Data being processed at Juicy Labs LLC shall be destroyed or anonymised when the processing purposes are achieved or when it is no longer necessary to achieve such purposes, unless otherwise envisaged by a federal law.

2.2 Purposes of Personal Data Processing

Personal Data shall be processed at Juicy Labs LLC for the following purposes:

- Recruitment and selection of staff.
- Formation of a candidate pool.
- Conclusion of an employment contract and fulfilment of obligations arising out in connection therewith.
- Practical training of students of Juicy Labs LLC.
- Conclusion of a civil law contract (hereinafter referred to as CLC) with an individual and fulfilment of obligations arising out in connection therewith.

- Conclusion of a contract with a counterparty and fulfilment of obligations arising out in connection therewith.
- Implementation of the Company's corporate governance procedures.
- Handling of appeals, requests, complaints, and documents related to the cases considered in court.

2.3 Grounds for Personal Data Processing

Juicy Labs LLC, being a Personal Data Operator, shall process the Personal Data of Data Subjects taking into account the following possible legal grounds:

- Consent of the Data Subject to the processing of their Personal Data.
- Achievement of the purposes envisaged by an international treaty of the Russian Federation or a law of the Russian Federation.
- A judicial act, an act of another authority or official that is enforceable in accordance with the enforcement laws of the Russian Federation.
- A contract to which the Personal Data Subject is a party, beneficiary or guarantor, and a contract entered into on the initiative of the Personal Data Subject or a contract under which the Personal Data Subject is a beneficiary or guarantor.
- Protection of the life, health or other vital interests of the Personal Data Subject, if it is impossible to obtain the consent of the Personal Data Subject.
- Rights and legitimate interests of the Operator or third parties, or socially significant purposes, provided that this does not violate the rights and freedoms of the Personal Data Subject.

2.4 Conditions for Termination of Personal Data Processing

A condition for termination of Personal Data Processing by Juicy Labs LLC may be:

- The purposes of Personal Data Processing are achieved or it is no longer necessary to achieve such purposes.
- Expiry of the validity term or withdrawal of the Data Subject's consent to the processing of their Personal Data.
- Detection of unlawful Personal Data Processing.

2.5 Procedure for the Deletion and Destruction of Personal Data

The Personal Data processed by Juicy Labs LLC shall be destroyed in the following cases:

- The purposes of processing are achieved or it is no longer necessary to achieve such purposes.
- Expiry of the established period of storage of Personal Data.
- At the request of the Data Subject, if the Personal Data processed by Juicy Labs LLC are incomplete, outdated, inaccurate, unlawfully obtained or are not necessary for the stated purpose of processing.
- Detection of unlawful Personal Data Processing, if it is impossible to ensure the lawfulness of the Personal Data Processing.

- Withdrawal by the Personal Data Subject of the consent to the processing of their Personal Data (if the Personal Data are processed by Juicy Labs LLC on the basis of the consent of the Personal Data Subject).

In the event the purpose of Personal Data Processing is achieved, or it is no longer necessary to achieve it, or the established period of storage of Personal Data expires, Juicy Labs LLC shall cease the Personal Data Processing and/or ensure its cessation (if the Personal Data Processing is carried out by another person or entity acting on behalf of Juicy Labs LLC), destroy the Personal Data and/or ensure their destruction within a period not exceeding thirty (30) calendar days from the date when the processing purpose is achieved, or when it is no longer necessary to achieve it, or when the established period of storage of Personal Data expires, unless otherwise stated in a contract to which the Data Subject is a party, beneficiary or guarantor, or another agreement, provided that there are no other legal grounds for the Personal Data Processing.

In the event of a request from the Data Subject, if the Personal Data processed by Juicy Labs LLC are incomplete, outdated, inaccurate, unlawfully obtained or are not necessary for the stated purpose of processing, and in the event of detection of unlawful Personal Data Processing carried out by Juicy Labs LLC and/or a person or entity acting on behalf of Juicy Labs LLC, and the impossibility of ensuring the lawfulness of the processing of such Personal Data, Juicy Labs LLC shall cease the Personal Data Processing and/or ensure its cessation (if the Personal Data Processing is carried out by another person or entity acting on behalf of Juicy Labs LLC), destroy the Personal Data and/or ensure their destruction within a period not exceeding ten (10) business days from the date of receipt of the corresponding request. The specified period may be extended, but not by more than five (5) business days, in the event that Juicy Labs LLC sends a reasoned notification to the Personal Data Subject indicating the reasons for extending the period for providing the requested information.

In the event of withdrawal by the Data Subject of the consent to the processing of their Personal Data, Juicy Labs LLC shall cease their processing and/or ensure its cessation (if the Personal Data Processing is carried out by another person or entity acting on behalf of Juicy Labs LLC) and, if the retention of Personal Data is no longer required for the purposes of Personal Data Processing, destroy the Personal Data and/or ensure their destruction within a period not exceeding thirty (30) calendar days from the date of receipt of the specified letter of withdrawal, unless otherwise envisaged by a contract to which the Personal Data Subject is a party, beneficiary or guarantor, or another agreement, or if Juicy Labs LLC is not entitled to process Personal Data without the consent of the Personal Data Subject.

In the event that it is impossible to destroy Personal Data within the specified periods, Juicy Labs LLC shall block such Personal Data and/or ensure their blocking (if the Personal Data Processing is carried out by another person or entity acting on behalf of Juicy Labs LLC) and/or ensure the destruction of Personal Data within a period not exceeding six (6) months, unless another period is established by federal laws.

3 CATEGORIES OF PERSONAL DATA SUBJECTS, COMPOSITION OF PROCESSED PERSONAL DATA AND ACTIONS (OPERATIONS) PERFORMED WITH PERSONAL DATA

3.1 Categories of Personal Data Subjects

Juicy Labs LLC shall process the Personal Data of the following categories of Personal Data Subjects:

- Candidate for a vacant position.
- Employee, including former employees of Juicy Labs LLC.
- Close relative of an employee.
- Student.
- Individual providing services (performing work) under a CLC.
- Counterparty (individual entrepreneur or self-employed person).
- Representative of a corporate counterparty, individual entrepreneur or self-employed person (representatives acting on the basis of a power of attorney).
- Member of the company.
- Other affiliates (individuals) related to the members of the company.
- Applicants, persons involved in the case.

3.2 Composition of Processed Personal Data

The composition of Personal Data of other categories of Personal Data Subjects processed at Juicy Labs LLC shall be determined in accordance with the legislation of the Russian Federation and the document titled “Juicy Labs Limited Liability Company. The list of Personal Data, purposes, periods and legal grounds for the Personal Data Processing”, taking into account the purposes of Personal Data Processing specified in Section 2.2 of this Policy.

Juicy Labs LLC shall not process any Personal Data concerning racial, ethnic origin, political views, religious or philosophical beliefs, or personal relationships.

3.3 Actions (Operations) Performed with Personal Data

Juicy Labs LLC shall ensure the collection, recording, structuring, accumulation, storage, clarification (update, modification), retrieval, use, transfer (dissemination, provision, access), anonymisation, blocking, deletion, destruction of Personal Data.

The Personal Data Processing by Juicy Labs LLC shall be carried out as follows:

- Without using computer technology (non-automated Personal Data Processing).
- Automated Personal Data Processing with or without the transfer of the obtained information via information and telecommunication networks.
- Mixed Personal Data Processing (a combination of automated and non-automated methods).

When collecting Personal Data, Juicy Labs LLC shall ensure the recording, structuring, accumulation, storage, clarification (update, modification), retrieval of Personal Data of

citizens of the Russian Federation when collected using the databases located in the Russian Federation.

4 RIGHTS OF PERSONAL DATA SUBJECTS

Personal Data Subjects shall have the right:

- To receive the following information regarding the processing of their Personal Data by Juicy Labs LLC:
 - Confirmation of the fact of the processing of their Personal Data by Juicy Labs LLC.
 - Legal grounds and purposes of the processing of their Personal Data.
 - Purposes and methods of processing their Personal Data used by the Operator.
 - Composition of the processed Personal Data related to the Data Subject, their source, unless a different procedure for the provision of such data is envisaged by a federal law.
 - Business name and place of registration of Juicy Labs LLC (the Operator), details of the persons (with the exception of employees of Juicy Labs LLC) who have access to their Personal Data or to whom their Personal Data may be disclosed on the basis of a contract with Juicy Labs LLC or on the basis of a federal law.
 - Business name or full name and address of the entity or person processing their Personal Data on behalf of the Operator, if the processing is entrusted or will be entrusted to such entity or person.
 - Details of the completed or intended cross-border transfer of their Personal Data.
 - Periods for the processing of their Personal Data, including the storage periods.
 - Procedure for the exercise by the Data Subject of the rights envisaged by Federal Law No. 152-FZ On Personal Data of 27 July 2006.
 - Other information envisaged by Federal Law No. 152-FZ On Personal Data of 27 July 2006 or other federal laws.
- Clarification of their Personal Data, their blocking or destruction if the Personal Data are incomplete, outdated, inaccurate, unlawfully obtained, or are not necessary for the stated purpose of processing.
- Withdrawal of the consent to the Personal Data Processing.
- Adoption of statutory measures to protect their rights.
- Appeal against the action or omission of Juicy Labs LLC carried out or admitted in violation of the requirements of the legislation of the Russian Federation in the field of Personal Data, to the competent authority in charge of the protection of the rights of Personal Data Subjects or to a court.
- Exercise of other rights envisaged by the legislation of the Russian Federation.

The right of a Personal Data Subject to receive information concerning the processing of their Personal Data by Juicy Labs LLC may be limited in accordance with the legislation of the Russian Federation.

5 INFORMATION ON THE IMPLEMENTED REQUIREMENTS FOR ENSURING THE SECURITY OF PERSONAL DATA

When processing Personal Data, Juicy Labs LLC shall take all necessary legal, organisational and technical measures sufficient to ensure the fulfilment of the obligations envisaged by Federal Law No. 152-FZ On Personal Data of 27 July 2006 and the regulations adopted in accordance therewith. Such measures shall include, in particular:

- Appointment by Juicy Labs LLC of a person responsible for the organisation of Personal Data Processing.
- Issuance by Juicy Labs LLC of this Policy, local regulations on the Personal Data Processing, and local regulations establishing the procedures aimed at preventing and detecting violations of the legislation of the Russian Federation in the field of organisation of processing and ensuring the security of Personal Data.
- Elimination by Juicy Labs LLC of the consequences of violations of the legislation of the Russian Federation in the field of organisation of processing and ensuring the security of Personal Data, in the event of their detection during inspections carried out by competent authorities, or in the event of their detection as part of internal control and/or audit.
- Implementation of internal controls and/or audit of conformity of the Personal Data Processing to Federal Law No. 152-FZ On Personal Data dated 27 July 2006 and the regulations adopted in accordance therewith, the requirements for the protection of Personal Data, this Policy, and local regulations of Juicy Labs LLC.
- Assessment of the harm that may be caused to Personal Data Subjects in the event of a violation of Federal Law No. 152-FZ On Personal Data dated 27 July 2006, the correlation of such harm and the measures taken by Juicy Labs LLC to ensure the fulfilment of the obligations envisaged by Federal Law No. 152-FZ On Personal Data of 27 July 2006.
- Ensuring that the employees of Juicy Labs LLC directly involved in the Personal Data Processing are aware of the provisions of the legislation of the Russian Federation on Personal Data, including the requirements for the protection of Personal Data, this Policy, local acts on the Personal Data Processing, and/or the training of the specified employees by Juicy Labs LLC.
- Inclusion of the obligations of third parties to comply with the confidentiality rules and ensure the security of Personal Data into the contracts with third parties providing for the need to transfer Personal Data.
- Inclusion of the following into the contracts with third parties entrusting the Personal Data Processing to a third party:
 - Obligations of third parties to comply with the principles and rules of Personal Data Processing envisaged by Federal Law No. 152-FZ On Personal Data dated 27 July 2006.
 - List of actions (operations) with Personal Data that will be performed by third parties.
 - Purposes of Personal Data Processing.

- Obligations of third parties to maintain confidentiality and ensure the security of Personal Data, and the requirements for their protection.
- Application by Juicy Labs LLC of the necessary legal, organisational and technical measures to ensure the security of Personal Data and the protection of Personal Data from unlawful or accidental access thereto, destruction, alteration, blocking, copying, provision, dissemination of Personal Data, and from other unlawful actions in relation to Personal Data, in particular:
 - Determination of threats to the security of Personal Data during their processing in the Personal Data Information Systems.
 - Application of organisational and technical measures to ensure the security of Personal Data during their processing in the Personal Data Information Systems, necessary for the fulfilment of the requirements for protection of Personal Data, the implementation of which ensures the levels of protection of Personal Data established by the Government of the Russian Federation.
 - Use of information security tools that have undergone the conformity assessment procedure in accordance with the established procedure.
 - Assessment of the efficiency of the measures taken to ensure the security of Personal Data before the commissioning of the Personal Data Information System.
 - Keeping records of machine-readable media containing Personal Data.
 - Detection of facts of unauthorised access to Personal Data.
 - Restoration of Personal Data modified or destroyed as a result of unauthorised access thereto.
 - Establishment of rules for access to Personal Data processed in the Personal Data Information System, and ensuring the registration and keeping records of all actions performed with Personal Data in the Personal Data Information System.
 - Control over the measures taken to ensure the security of Personal Data and the level of security of the Personal Data Information Systems.

6 FINAL PROVISIONS

Juicy Labs LLC shall ensure unrestricted access to this Policy by publishing this Policy on the websites belonging to Juicy Labs LLC on the Internet, which are used for the collection of Personal Data.

Other rights and obligations of Juicy Labs LLC shall be determined by the legislation of the Russian Federation in the field of organisation of processing and ensuring the security of Personal Data.

Any amendments and supplements to this Policy shall be made by introducing amendments or approving a new version of this Policy in accordance with the procedure applicable at Juicy Labs LLC.

In the event of any changes in the legislation of the Russian Federation and internal documents of Juicy Labs LLC this Policy shall apply to the extent that it does not contradict the amendments made.

Changes in the names of organisational units of Juicy Labs LLC, positions and roles of employees of Juicy Labs LLC listed in this Policy, without a significant change in the actual functionality of the organisational units, shall not entail the need to update this Policy.

As regards any issues not regulated by this Policy, employees of Juicy Labs LLC shall be guided by the legislation of the Russian Federation and the internal documents of Juicy Labs LLC.

Amendments shall be made to this Policy in the following events:

- By decision of the management of Juicy Labs LLC based on periodic verification measures carried out by the Person Responsible for the Organisation of Personal Data Processing.
- In the event of changes in the legislation of the Russian Federation regulating the relations in the relevant field.
- In the event of changes in the regulations of regulators.

This Policy shall become effective on the date of approval hereof by the head of Juicy Labs LLC (or another authorised person) and shall remain in effect until the approval of a new version of this Policy.

7 DETAILS OF THE PERSONAL DATA OPERATOR

Full business name: Juicy Labs Limited Liability Company.

Abbreviated business name: Juicy Labs LLC.

Registered address: 15 A, Leninsky Avenue, Moscow, 119071.

TIN (Taxpayer Identification Number) / TRRC (Tax Registration Reason Code):
7717294300 / 772501001.

You can contact the following addresses for inquiries related to the processing and protection of Personal Data:

- For written inquiries: 15 A, Leninsky Avenue, Moscow, 119071.
- E-mail: privacy@juicyscore.com.