

POLICY PROCESSING AND PROTECTION OF PERSONAL DATA

Terms and Definitions

access to personal data – means the possibility of obtaining and using personal data;

change of personal data – actions aimed at modifying the values of personal data;

accumulation of personal data – actions aimed at forming an initial, unsystematized array of personal data;

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);

clarification of personal data – actions aimed at updating or changing personal data;

collection of personal data – the stage at which the Personal Data Subject transfers his personal data;

Company, Operator – The personal data operator, as used herein, means Juicy Labs Limited Liability Company (Abbreviated business name: Juicy Labs LLC);

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;

deletion of personal data – removal of personal data from the PDIS while maintaining the subsequent possibility of their recovery;

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;

FZ-152 – Federal Law of the Russian Federation of 27.07.2006 No. 152-FZ "On Personal Data";

material carriers of personal data – are documents recorded on paper, documents on electronic media in which personal data is indicated;

mixed personal data processing – means a combination of automated and non-automated methods for personal data processing;

personal data extraction – actions aimed at constructing structured personal data from unstructured or semi-structured machine-readable documents;

Personal Data Information System (or PDIS) – means a set of personal data contained in databases, and the information technologies and technical resources that ensure their processing;

personal data – mean any information related to a directly or indirectly identified or identifiable individual (Personal Data Subject);

personal data 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;

personal data processing – means any action (operation) or set of actions (operations) performed with personal data, whether by automated means, such as collection, recording, systematization,

accumulation, storage, clarification (update, modification), extraction, use, transfer (dissemination, provision, access), blocking, deletion, destruction of personal data;

Personal Data Subject – is an individual who is directly or indirectly identified or determined by personal data;

provision of personal data – means any actions aimed at disclosing personal data to a specific person or a specific group of persons;

recording of personal data – input of personal data into an electronic computer and (or) recording of personal data on tangible personal data carriers;

Roskomnadzor – Federal Service for Supervision of Communications, Information Technology and Mass Communications;

storage of personal data actions – aimed at the immutability of the state of the material carrier of personal data;

systematization of personal data – actions aimed at combining and arranging personal data in a certain sequence;

transfer of personal data – provision and access to personal data;

update personal data – actions aimed at bringing recorded personal data into line with the state of displayed objects of the subject area;

use of personal data – actions (operations) with personal data performed for the purpose of making decisions or performing other actions that generate legal consequences in relation to the Personal Data Subject or other persons, or otherwise affect the rights and freedoms of the Personal Data Subject or other persons;

In the absence of a definition of the term or abbreviation used in the Policy, the interpretation and application of the term or abbreviation is carried out in accordance with the provisions of the applicable regulatory legal acts of the Russian Federation.

1. GENERAL PROVISIONS

1.1. The Policy has been developed in accordance with FZ-152 and the legislation of the Russian Federation in the field of personal data to implement the provisions of the legislation of the Russian Federation, which define the cases and features of personal data processing, as well as establish requirements for the processing of personal data.

1.2. The Policy is aimed at ensuring the protection of the rights and freedoms of the Personal Data Subject when processing his personal data by the Company, including the protection of the rights to privacy, personal and family secrets (The policy was developed, among other things, in accordance with the recommendations prepared by Roskomnadzor on drafting a document defining the operator's policy regarding the processing of personal data, in accordance with the procedure established by FZ-152. The structural and substantive content of the Policy was formed in accordance with the requirements of the articles 5, 6, 18, 18.1, 19, 22 FZ-152.).

1.3. The requirements of the Policy are mandatory for all employees of the Company. The Company's employees are familiarized with the terms, including changes to the terms of the Policy, under signature, taking into account the requirements provided for in the Company's local regulations. Compliance with the requirements of the Policy is monitored by the person responsible for organizing the processing of personal data in the Company (hereinafter referred to as the Person Responsible for organizing the processing of personal data).

1.4. Within the framework of its activities, the Company **does not carry out**: Dissemination of personal data; processing of special and biometric personal data; depersonalization of personal data; Cross-border transfer of personal data; activities for the purpose of promoting goods, works,

services on the market through direct contacts with the Personal Data Subject using means of communication.

1.5. When storing personal data, the Company uses databases located on the territory of the Russian Federation in accordance with Part 5 of art. 18 FZ-152.

1.6. The Policy is approved by the order of the General Director. The Policy is reviewed at least once a year, and:

- in case of changes in the legislation of the Russian Federation in the field of personal data processing and protection;
- in cases of receiving requirements (instructions) from authorized bodies on the elimination of inconsistencies affecting the scope of the Policy;
- by decision of the General Director of the Company;
- if there is a need to change the purposes, principles and conditions of personal data processing in the Company.

1.7. The current hard copy version of the Policy is kept at the address: 5 A, Leninsky Avenue, Moscow, 119071, and is published for unlimited access in electronic format on the Company's website located at: <https://juicyscore.online/ru>. Access to the Policy is also provided on all pages of the Company's website, which are used to collect personal data of Personal Data Subjects.

1.8. Any requests and requests regarding the processing or protection of personal data are sent to the Company using the Company's contact information.

1.9. The Company has the right to entrust the processing of personal data of Personal Data Subjects to third parties if there are appropriate legal grounds and compliance with the requirements of FZ-152.

1.10. In case of changes in the legislation of the Russian Federation, the Policy is applied to the extent that it does not contradict the newly adopted acts of the legislation of the Russian Federation.

1.11. When processing personal data, the Company is guided by the principles, as well as the requirements for the procedure and conditions for processing personal data, established by the provisions of the legislation of the Russian Federation.

1.12. The collection and further actions (operations) for the processing of personal data are carried out in compliance with the rights and legitimate interests of Personal data Subjects, as well as in the presence of legal grounds for the processing of personal data.

1.13. The Company determines the list of positions that process personal data. Access to the personal data being processed is provided only to those employees of the Company who need it to perform specific functions within the framework of their official duties. The job descriptions of the Company's employees, as well as employment contracts with employees, include responsibilities to ensure the confidentiality and security of personal data and measures of responsibility for their non-fulfillment.

1.14. When processing personal data, the Company ensures timely clarification (updating, modification) of the personal data of the Personal Data Subject, which is carried out, in particular, in case of confirmation of the inaccuracy of personal data based on:

- appeals and requests to the Company of the Personal Data Subject, his representative (who has the authority to represent the interests of the Personal Data Subject), with documents confirming the fact of inaccuracy and modification of personal data;
- the establishment by the Company of discrepancies between the previously received personal data of the Personal Data Subject and the personal data provided by the Personal Data Subject along with supporting documents.

1.15. The Company does not disclose or provide personal data to third parties without a legal basis provided for by the legislation of the Russian Federation.

1.16. The Company's receipt of personal data from a third party or transfer (provision, access) of personal data to a third party, as well as the assignment of personal data processing to a third party, is permitted with the consent of the Personal Data Subject to the processing of personal data, or if there are other legal grounds provided for by the legislation of the Russian Federation. The Company is responsible to the Personal Data Subject for the actions of persons to whom the Company entrusts the processing of personal data of the Personal Data Subject.

1.17. The transfer of personal data to state authorities and institutions, municipal authorities, state extra-budgetary funds, as well as the receipt of personal data from state authorities and institutions, municipal authorities, and state extra-budgetary funds is permitted in the absence of the consent of the Personal Data Subject to the processing of his personal data in accordance with the procedure and in cases provided for by the legislation of the Russian Federation.

1.18. The processing of personal data is terminated upon achievement of the purposes of such processing, as well as upon expiration of the period provided for by the legislation of the Russian Federation, the contract or the consent of the Personal Data Subject to the processing of his personal data. If the Personal Data Subject withdraws consent to the processing of his personal data and/or demands the termination of personal data processing, the Company has the right to continue processing personal data without the consent of the Personal Data Subject, provided that there are legal grounds provided for by FZ-152.

1.19. If the Company does not have legal grounds for processing personal data, the Company, in accordance with the procedure established by FZ-152, destroys personal data or ensures their destruction (if the processing of personal data is carried out by a person acting on behalf of the Company).

1.20. Persons guilty of violating the procedure for processing and protecting personal data bear the responsibility provided for by the legislation of the Russian Federation.

2. PERSONAL DATA PROCESSING PROCESSES

2.1. Labor relations:

The purpose of processing is to fulfill the Company's obligations under concluded employment contracts.

Composition (categories) of personal data:

corporate email address; address of the place of residence; registration address; email address; citizenship; data of the document confirming the right of a foreign citizen to temporary stay (residence), a residence permit in the territory of the Russian Federation; data of the document confirming the right of a foreign citizen to work; details of the identity document; date of birth; position; income; TIN; place of birth; mobile phone number; current account number; gender; information about the status of a tax resident; information about education; information about employment (including work experience, current employment data, indicating the name and current account of the organization); Insurance Number of Individual Ledger Account; service number; last name, first name, patronymic.

Categories of subjects whose personal data is processed: employees, dismissed employees.

Legal basis of personal data processing:

- the processing of personal data is necessary to achieve the goals stipulated by an international agreement of the Russian Federation or a law, to carry out and fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation;
- the processing of personal data is necessary for the execution of a judicial act, an act of another body or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;
- the processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator.

List of actions: collection, recording, systematization, accumulation, clarification (update, modification), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction.

Processing methods: mixed processing: with transmission over the Company's internal network, with transmission over the Internet.

Processing period: the term of the employment contract, as well as for 5 (five) years after termination of the employment contract in accordance with the legislation of the Russian Federation.

Storage period: for 5 (five) years after termination of the employment contract, for 50 years in accordance with the legislation of the Russian Federation.

2.2. Search and selection of personnel

The purpose of the processing is to search for and select candidates for employment to fill vacant positions.

Composition (categories) of personal data:

email address; citizenship; date of birth; position; knowledge of foreign languages (proficiency level); driver's license category; mobile phone number; gender; information about employment; information about education; marital status; country of work permit; last name, first name, patronymic; photo image.

Categories of subjects whose personal data is being processed: job seekers

Legal basis of personal data processing:

the processing of personal data is carried out with the consent of the Personal Data Subject to the processing of his personal data.

List of actions: collection, use, transfer (provision, access).

Processing methods: automated processing: without transmission over the Company's internal network, with transmission over the Internet.

Processing period: before the conclusion of an employment contract, or before a decision is made by the Company and/or the applicant not to conclude an employment contract, as well as within 3 (three) months after the relevant decision is made in accordance with the legislation of the Russian Federation.

Storage period: no storage is carried out.

2.3. Interaction with counterparties

The purpose of processing: conducting contractual work in the Company.

Composition (categories) of personal data:

email address; corporate email address; registration address; citizenship; details of the identity document; the data of the document on registration as a payer of professional income tax; date of birth; position; TIN; place of work; place of birth; mobile phone number; work phone number; current account number; gender; information about the status of a tax resident; Insurance Number of Individual Ledger Account; last name, first name, patronymic.

Categories of subjects whose personal data is processed: counterparties, representatives of counterparties, beneficiaries of contracts.

Legal basis of personal data processing:

- the processing of personal data is necessary to achieve the goals stipulated by an international agreement of the Russian Federation or a law, to carry out and fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation;
- the processing of personal data is necessary for the performance of an agreement to which the personal data subject is a party or beneficiary or guarantor, as well as for the conclusion of an agreement on the initiative of the personal data subject or an agreement under which the personal data subject will be the beneficiary or guarantor;
- the processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator.

List of actions: collection, recording, systematization, accumulation, clarification (update, modification), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction.

Processing methods: mixed processing: with transmission over the Company's internal network, with transmission over the Internet.

Processing period: the term of the agreement, as well as for 5 (five) years after termination of the agreement in accordance with the legislation of the Russian Federation.

Storage period: at least 5 (five) years after the termination of the contract, the final shelf life is determined depending on the type of contract in accordance with the legislation of the Russian Federation.

2.4. Bonuses, training and compensation

The purpose of processing is to provide bonuses, training, and compensation to the Company's employees.

Composition (categories) of personal data:

corporate email address; registration address; citizenship; details of the identity document; data of an identity document outside the Russian Federation; document data contained in the birth certificate; the document data contained in the child's birth certificate; the document data contained in the marriage certificate; the document data contained in the death certificate and death certificate; date of birth; position; TIN; place of work; place of birth; mobile phone number; current account number; gender; information about education; Insurance Number of Individual Ledger Account; last name, first name, patronymic;

Categories of subjects whose personal data is processed: employees

Legal basis of personal data processing:

- the processing of personal data is necessary to achieve the goals stipulated by an international agreement of the Russian Federation or a law, to carry out and fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation;
- the processing of personal data is necessary for the performance of an agreement to which the personal data subject is a party or beneficiary or guarantor, as well as for the conclusion of an agreement on the initiative of the personal data subject or an agreement under which the personal data subject will be the beneficiary or guarantor.

List of actions: collection, recording, systematization, accumulation, clarification (update, modification), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction.

Processing methods: mixed processing: with transmission over the Company's internal network, with transmission over the Internet.

Processing period: the term of the employment contract, as well as for 5 (five) years after termination of the employment contract in accordance with the legislation of the Russian Federation.

Storage period: within 5 (five) years after termination of the employment contract, in accordance with the legislation of the Russian Federation.

2.5. Management of the Company

The purpose of the processing is to manage the Company.

Composition (categories) of personal data:

email address; corporate email address; registration address; address of the place of residence; citizenship; details of the identity document; date of birth; position; TIN; place of birth; place of work; mobile phone number; current account number; gender; information about the status of a tax resident; Insurance Number of Individual Ledger Account; last name, first name, patronymic.

Categories of subjects whose personal data is processed: members of the company, affiliated persons.

Legal basis of personal data processing:

- the processing of personal data is necessary to achieve the goals stipulated by an international agreement of the Russian Federation or a law, to carry out and fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation;
- the processing of personal data is necessary for the performance of an agreement to which the personal data subject is a party or beneficiary or guarantor, as well as for the conclusion of an agreement on the initiative of the personal data subject or an agreement under which the personal data subject will be the beneficiary or guarantor;
- the processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator.

List of actions: collection, recording, systematization, accumulation, clarification (update, modification), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction.

Processing methods: mixed processing: with transmission over the Company's internal network, with transmission over the Internet.

Processing period: the period of ownership of a share by a member of the company, the period of participation of an affiliated person in the company's activities, as well as for 5 (five) years after in accordance with the legislation of the Russian Federation.

Storage period: permanently in accordance with the legislation of the Russian Federation.

2.6. Issuing powers of attorney

The purpose of processing is to issue powers of attorney to represent the interests of the Company.

Composition (categories) of personal data:

corporate email address; registration address; citizenship; details of the identity document; date of birth; position; TIN; place of work; place of birth; gender; Insurance Number of Individual Ledger Account; last name, first name, patronymic.

Categories of subjects whose personal data is processed: legal representatives.

Legal basis of personal data processing: personal data processing is necessary to achieve the goals stipulated by an international agreement of the Russian Federation or a law, to carry out and fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation.

List of actions: collection, use, transfer (provision, access), storage, blocking, deletion, destruction.

Processing methods: mixed processing: with transmission over the Company's internal network, with transmission over the Internet.

Processing period: the validity period of the power of attorney.

Storage period: at least 5 (five) years from the expiration date of the power of attorney, in accordance with the legislation of the Russian Federation.

2.7. Feedback form

The purpose of processing: sending through the feedback form on the Company's website, contact information and messages to the Company for further interaction between the parties.

Composition (categories) of personal data:

e-mail address (mail); company; phone number; country; last name, first name, patronymic.

Categories of subjects whose personal data is being processed: site visitors.

Legal basis for the processing of personal data: the processing of personal data is carried out with the consent of the personal data subject to the processing of his personal data.

List of actions: collection, use, transfer (provision, access), blocking, storage, deletion, destruction.

Processing methods: automated processing: with transmission over the Company's internal network, with transmission over the Internet.

Processing period: 1 (one) one year from the date of sending the message via the feedback form.

Storage period: storage for 3 (three) years after the end of the processing period.

3. GENERAL RULES FOR THE DESTRUCTION OF PERSONAL DATA

3.1. The destruction of personal data processed by the Company is carried out in the following cases (Personal data stored in accordance with the legislation of the Russian Federation is not subject to destruction.):

- the personal data being processed is subject to destruction upon achievement of the processing objectives or in case of loss of the need to achieve these objectives;
- if the personal data is illegally obtained or is not necessary for the stated purpose of processing;
- in case of detection of unlawful processing of personal data, if it is impossible to ensure the legality of such processing;
- if the personal data subject withdraws his consent to the processing of personal data and if the storage of personal data is no longer required for the purposes of personal data processing in accordance with the legislation of the Russian Federation;
- upon expiration of the personal data storage period, if the storage of personal data is no longer required for the purposes of personal data processing;
- in the case of a request from a personal data subject to terminate the processing of personal data, if the processing of personal data is not established by the legislation of the Russian Federation.

3.2. When personal data is destroyed, the following methods are used:

- for paper carriers of personal data - shredding in a paper cutting machine;
- for media on optical disks – physical destruction (destruction), including using paper-cutting machines with the function of destroying optical media;
- for information carriers on hard magnetic disks (internal disks and microcircuits are subject to destruction), SSD disks, flash memory-based drives - physical destruction of parts of

information carriers (destruction or severe deformation). It is also possible to destroy media using electromagnetic devices.;

- for individual documents (files) on electronic media – erasure using software tools for destroying information that has passed the conformity assessment procedure in accordance with the established procedure.

3.3. The destruction of copies, excess copies, defective sheets, etc. is carried out in a simplified manner using a paper shredder (paper cutting machine). In this case, an act of destruction is not drawn up.

3.4. Unauthorized destruction of personal data is prohibited in the Company.

3.5. The destruction of personal data in the Company is carried out through the implementation of actions, as a result of which it becomes impossible to restore the content of personal data in the PDIS, or on other media, and / or as a result of which media containing personal data are destroyed.

3.6. The destruction of personal data is carried out under the supervision of the Commission for Internal Control of Personal Data Processing, formed in accordance with the procedure established in the local regulations of the Company.

3.7. The fact of destruction of personal data is confirmed by the act of destruction of personal data, as well as in the case of deletion of personal data from the PDIS by uploading from the event log in the PDIS.

4. PRINCIPLES AND LEGAL BASES OF PERSONAL DATA PROCESSING

4.1. The organization of personal data processing and protection in the Company is carried out taking into account the general principles of personal data processing, which are the basis for compliance with the requirements of the legislation of the Russian Federation, ensuring the confidentiality and security of personal data of Personal Data Subject, as well as protecting the rights of Personal Data Subject. Among such principles are:

- processing of personal data on a lawful and fair basis;
- ensuring that the processing of personal data is limited to pre-determined and legitimate purposes of personal data processing, including preventing the processing of personal data that is incompatible with the purposes of personal data collection;
- preventing the consolidation of databases containing personal data, the processing of which is carried out for purposes incompatible with each other;
- processing exclusively of those personal data that meet the purposes of personal data processing;
- ensuring that the content and volume of personal data being processed correspond to the stated purposes of personal data processing, including preventing the processing of personal data that is excessive in relation to the stated purposes of their processing;
- ensuring the accuracy of personal data, their sufficiency and, where appropriate, relevance to the purposes of personal data processing;
- the storage of personal data in a form that allows determining the personal data subject for no longer than the purposes of their processing require, unless another period of storage of personal data is established by the legislation of the Russian Federation, an agreement to which the personal data subject is a party, beneficiary or guarantor;
- destruction or ensuring the destruction of personal data (if the processing of personal data is carried out by a person acting on behalf of the Company), upon achieving the goals of their

processing or in the event of loss of the need to achieve these goals, unless otherwise provided by the legislation of the Russian Federation.

4.2. The legal grounds for processing personal data of Personal Data Subject are established taking into account certain conditions of personal data processing. The legal grounds for the processing of personal data, on the basis of which the processing of personal data in the Company is permitted, are:

- consent of the Personal Data Subject to the processing of his personal data;
- achieving the goals stipulated by the legislation of the Russian Federation for the Company to carry out the functions, powers and duties assigned to it by the legislation of the Russian Federation, as well as by the Company's charter;
- execution of a judicial act, an act of a state body or an official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;
- execution of an agreement to which the Personal Data Subject is a party or beneficiary or guarantor, as well as to conclude an agreement on the initiative of the Personal Data Subject or an agreement under which the Personal Data Subject will be the beneficiary or guarantor;
- exercising the rights and legitimate interests of the Operator.

5. MEASURES TO ENSURE THE SECURITY OF PERSONAL DATA

5.1. The protection of personal data in the Company is provided within the framework of a single set of organizational, technical and legal measures, taking into account the requirements of the legislation of the Russian Federation.

5.2. When processing personal data, the Company takes all possible legal, organizational and technical measures to protect personal data from unlawful or accidental access to it, destruction, modification, blocking, copying, provision, Dissemination of personal data, as well as from other unlawful actions with respect to personal data, including in the following ways:

- appointment of the Person responsible for the organization of personal data processing;
- by issuing local regulations defining the Company's policy regarding the processing and protection of personal data, on personal data processing, as well as establishing procedures aimed at preventing and detecting violations of the legislation of the Russian Federation, and eliminating the consequences of such violations;
- implementation of internal control and (or) audit of compliance of personal data processing with the legislation of the Russian Federation and local regulations adopted in accordance with it;
- by conducting an assessment of the damage in accordance with the requirements established by the legislation of the Russian Federation, which may be caused to Personal Data Subjects in case of violation of FZ-152, the ratio of the specified harm and the measures taken to ensure the fulfillment of the Company's obligations provided for by the legislation of the Russian Federation;
- familiarization of the Company's employees who directly process personal data with the provisions of the legislation of the Russian Federation on personal data, including the requirements for personal data protection, local regulations on personal data processing, and (or) training of these employees;
- publication of the Policy for unrestricted access on the Company 's website;
- development of private threat models of personal data during their processing in PDIS;

- determination of the levels of protection of personal data established by the legislation of the Russian Federation during their processing in the PDIS;
- the use of organizational and technical measures based on private threat models and security levels to ensure the security of personal data during their processing in the PDIS;
- the use of information security tools within the framework of security systems that have passed the compliance assessment procedure in accordance with the established procedure;
- carrying out an assessment of the effectiveness of measures taken to ensure the security of personal data during their processing in the PDIS;
- taking into account the material carriers of personal data;
- by detecting the facts of unauthorized access to personal data and taking appropriate response measures;
- recovery of personal data modified or destroyed due to unauthorized access to them;
- by establishing rules for access to personal data processed in the PDIS, as well as ensuring registration and accounting of all actions performed with personal data in the PDIS;
- by setting rules for access to the premises where personal data is processed;
- the separation of personal data during their processing in the Company, carried out without the use of automation tools, from other information by recording them on separate material carriers of personal data, in special sections and in the fields of forms (forms);
- preventing the fixation of personal data, the purposes of processing which are obviously incompatible, on a single tangible personal data carrier (for processing various categories of personal data carried out without the use of automation tools, a separate tangible personal data carrier is used for each category of personal data in the Company);
- ensuring separate storage of material media from personal data, which is processed for various purposes;
- by clarifying personal data when processing them in the Company without using automation tools by updating or changing data on a tangible personal data carrier, and if this is not allowed by the technical features of the tangible personal data carrier, by fixing information about changes made to them on the same tangible personal data carrier, or by manufacturing a new tangible personal data carrier. data with updated personal data;
- storage of personal data of physical carriers of personal data in lockable cabinets, safes, excluding unauthorized access to them;
- storage of personal data, regardless of the type of media, in a round-the-clock locked and guarded room equipped with a security and fire alarm system.

6. RESPONSIBLE FOR THE ORGANIZATION OF PERSONAL DATA PROCESSING

6.1. The person responsible for the organization of personal data processing is appointed by the General Director of the Company.

6.2. The main functions of the Person responsible for the organization of personal data processing:

- to organize and carry out internal control over the Company 's compliance with the legislation of the Russian Federation on personal data, including requirements for personal data protection;

- to bring to the attention of the Company's employees the provisions of the legislation of the Russian Federation on personal data, local regulations on the processing and protection of personal data, and requirements for the protection of personal data;
- organize the reception and processing of requests and requests from Personal Data Subjects or their representatives and (or) monitor the reception and processing of such requests and requests.

6.3. The Company has also appointed a person responsible for ensuring the security of personal data processed in PDIS, and a Commission for Internal Control of Personal Data Processing has been established.

7. RIGHTS OF THE PERSONAL DATA SUBJECT

7.1. The Personal Data Processing has the right to:

- freely, voluntarily and in their own interest, provide consent to the processing of personal data, taking into account the requirements of FZ-152 on the form and content of consent to the processing of personal data;
- send requests and requests, including repeated ones, and receive information on the processing of personal data belonging to the Personal Data Subject in the manner, form, volume and within the time limits established by the legislation of the Russian Federation;
- to require the Company to clarify their personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as to take measures provided for by the legislation of the Russian Federation to protect their rights, taking into account the exceptions established by FZ-152;
- to request the Company to stop processing their personal data, as well as to revoke their consent to the processing of personal data; to exercise other rights provided for by the legislation of the Russian Federation.

8. THE PROCEDURE FOR RECEIVING REQUESTS AND REQUESTS FROM PERSONAL DATA SUBJECTS OR THEIR REPRESENTATIVES

8.1. In order to exercise and protect their rights and legitimate interests, the Personal Data Subject or his representatives must contact the Company's current contact information.

8.2. When considering applications and requests from Personal Data Subjects, the Company is guided by the provisions of the legislation of the Russian Federation, according to which an application and request sent by a Personal Data Subject must contain information provided for by FZ-152, namely:

- last name, first name, patronymic of the Personal Data Subjects or his representative;
- the series, number of the identity document of the Personal Data Subject or his representative, information about the date of issue of the specified document and the issuing authority;
- information confirming the Personal Data Subject's participation in relations with the Company (contract number, date of conclusion of the contract, conditional designation and (or) other information), or other information otherwise confirming the fact of personal data processing by the Company;
- signature of the Personal Data Subject or his representative;
- if the request is sent by a representative of the Personal Data Subject, it must contain a copy of the document confirming the authority of such representative.

- 8.3. If the request and the request are sent in the form of an electronic document, the document is signed with an electronic signature in accordance with the legislation of the Russian Federation.
- 8.4. The Company provides information and/or takes other measures in connection with the receipt of requests and requests from Personal Data Subjects in the amount and within the time limits stipulated by the legislation of the Russian Federation.
- 8.5. The deadline established by the legislation of the Russian Federation for responding to a Personal Data Subject's request and request for information related to the processing of his personal data may be extended based on the restrictions established by FZ-152, with a reasoned notification addressed to the Personal Data Subject containing information on the reasons for extending the deadline for providing the requested information.
- 8.6. Upon receiving the request and the request of the Personal Data Subject and being convinced of its legality, the Company provides the Personal Data Subject and/or his representative, who has the authority to represent the interests of the Personal Data Subject, with the information specified in the request and the request in the form in which the relevant request and the request are sent, unless otherwise specified in the appeal and request, and / or takes other measures depending on the specifics (features) of the appeal and request.
- 8.7. The information provided by the Company may not contain personal data belonging to other Subjects of personal data, except in cases where there are legitimate grounds for the disclosure of such personal data.
- 8.8. The Company has the right to refuse to satisfy the Personal Data Subject's requirements specified in the request by sending a reasoned refusal to the Personal Data Subject or his representative, if the Company has legitimate grounds to refuse to fulfill/satisfy the received requirements in accordance with the legislation of the Russian Federation.
- 8.9. To ensure compliance with the rights and legitimate interests of Personal Data Subjects, the Company monitors the reception and processing of requests and requests from Personal Data Subjects.
- 8.10. The Company considers any appeals, requests and complaints from Personal Data Subjects, thoroughly investigates the facts of violations and takes all necessary measures to eliminate them immediately, punish the perpetrators and resolve disputes and conflict situations in a pre-trial manner.

INFORMATION ABOUT THE PERSONAL DATA OPERATOR, CONTACT INFORMATION

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. PSRN (Primary State Registration Number) 1157746624826

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.