

PRIVACY AND PERSONAL DATA PROCESSING POLICY

1 GENERAL PROVISIONS

1.1 This Privacy and Personal Data Processing Policy (hereinafter - the Policy) of users of the <https://neo-tech.global> website (hereinafter - the Website) is designed to declare the provisions under which the limited liability company "NEOTECH" (INN 9703076320, OGRN 1227700121758) (hereinafter - the Rights Holder or Licensor) processes the personal data of users of the Website. The owner of the exclusive proprietary rights to the Website is the Right Holder.

1.2 Terms, definitions and concepts used in the Policy:

- Website means the website accessible at <https://neo-tech.global>.
- Personal Data (also – personal data) - any information relating to an identified or identifiable individual (the subject of personal data), including his or her surname, name, patronymic, year, month, date and place of birth, address, email address, phone number, marital, social, property status, education, profession, income, other information.
- Blocking of personal data - temporary termination of processing of personal data (except in cases where processing is necessary to clarify personal data);
- Protection of personal data - a set of technical, organizational and organizational-technical measures aimed at protecting information relating to a defined or determinable on the basis of such information, the subject of Personal Data;
- Operator - holder, alone or jointly with other persons organizing and (or) performing processing of personal data, as well as determining the processing of personal data, the composition of personal data to be processed, actions (operations) performed with personal data;
- Confidentiality of personal data – keeping confidentiality of personal data is an obligation of the operator or other person who has access to personal data, the requirement not to disclose personal data to third parties and their distribution for purposes other than those set forth in this Policy, without the consent of the personal data subject or the presence of any other legal basis;
- Depersonalization of personal data - any action that makes it impossible, without the use of additional information, to determine what personal data belongs to a particular subject of personal data;
- Processing of personal data - any action (operation) or set of actions (operations), performed with or without the use of automation with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data, unless otherwise expressly stated in this Policy;
- Responsible for the processing of personal data - an employee of the Rights Holder, who ensures the security, protection and compliance with the requirements of applicable law in the processing of personal data;
- Provision of personal data - actions aimed at disclosure of personal data to state authorities, which carry out verification of personal data;
- Destruction of personal data - actions, as a result of which it becomes impossible to restore the content of personal data in the information system of personal data and (or) as a result of which tangible media of personal data are destroyed;
- User - any natural person using the Website and its components, services specified on the Website, who has accepted the terms of this Policy;
- Publicly available personal data - personal data to which access is granted to the general public with the consent of the subject, or which, in accordance with federal law does not apply the requirement of confidentiality.

1.4 This Policy applies to both automated and non-automated processing of personal data. With automated processing of personal data, the Rights Holder is the controller with respect to such personal data.

1.7 The Policy is subject to revision and, if necessary, updating if the functionality of the Service changes. The User agrees to monitor and accept changes of this Policy from the date of the modification.

2 PRINCIPLES OF PERSONAL DATA PROCESSING

- 2.1 Personal data is collected and processed on the pri of fairness and expediency.
- 2.2 Personal data is stored for predetermined purposes and is not used in any other way that is incompatible with those purposes stated in this Policy.
- 2.3 Personal data is adequate, relevant and not excessive for the purpose of its retention.
- 2.4 No processing of personal data that is incompatible with the purposes for which such data is collected shall be permitted.
- 2.5 Databases containing personal data which are processed for purposes incompatible with each other shall not be combined.
- 2.6 Only those personal data may be processed that meet the purposes for which it is being processed.
- 2.7 The content and scope of personal data processed must be consistent with the stated processing purposes.
- 2.8 Processing of personal data that is excessive in relation to the stated processing purposes is not permitted.
- 2.9 Processing of personal data must ensure the accuracy of personal data, its sufficiency and, where necessary, relevance in relation to the purpose of personal data processing. Incomplete or inaccurate data must be deleted or clarified.
- 2.10 Personal data must be stored in a form which permits identification of the subject of personal data, for no longer than is required by the purposes of personal data processing, unless the period of storage of personal data is established by law, an agreement to which the subject of personal data is a party, a beneficiary or a guarantor.
- 2.11 Upon attainment of the purposes of processing or in case of loss of the need to attain those purposes, personal data must be destroyed or depersonalized at the legitimate request of the personal data subject or the competent judicial and executive authorities, unless otherwise provided by applicable law.

3 POSSIBLE TYPES OF PERSONAL DATA RECEIVED

3.1 The Service may access the following information, if applicable (in some cases, the User himself/herself provides the following data)

- Surname, first name, patronymic.
- Date of birth.
- Information about the project (business information).
- E-mail address.
- Phone number (home, cell phone).
- Name of the company / business, as well as other identifying information about the legal entities affiliated with the User.
- Record of electronic correspondence on the Website.

4 PURPOSES OF PERSONAL DATA PROCESSING

- The Rights Holder processes personal data for the purpose of enabling the User to use the Website to order the services of the Rights Holder through the Website, as well as
- rendering consulting, informational and intermediary services.
- Other transactions not prohibited by law, as well as a set of actions with personal data required to perform the above transactions.

- In order to fulfill the requirements of the legislation of the Russian Federation.
- Presentation of information of notifying or marketing character, including information about new services, ongoing promotions, events (subject to the User's prior consent to receive such information).
- processing of inquiries/complaints from Users.

5 ORDER AND CONDITIONS OF PROCESSING OF PERSONAL DATA

5.1 The Licensor processes personal data both with and without the use of automation tools (in case the User contacts the Licensor in abnormal situations).

5.2 The Rights Holder does not provide or disclose personal data to third parties without the consent of the data subject, except in cases provided by law.

5.3 The consent of the subject of personal data to the processing of his/her personal data may be given by the subject of personal data or his/her representative in any form that allows to confirm the fact of its receipt, in particular, by consent to the provisions of this Policy at the start of the use of the Service.

5.4 The Licensor shall take organizational and technical measures to protect personal data.

5.5 The condition for termination of the processing of personal data may be the achievement of the objectives of personal data processing and / or revocation of the consent of the subject of personal data for their processing.

5.6 The personal data (e.g. photos, correspondence or videos used by the User within the Service) will not be stored by the Rights Holder and will not be given to third parties.

6 DURATION OF STORAGE OF PERSONAL DATA

6.1 Personal Data shall be stored within the time limits defined by applicable law.

6.2 The data selected or entered by the User is stored in the Service.

7 INTERACTION WITH SUBJECTS OF PERSONAL DATA

7.1 The Subject of personal data is given the opportunity to: 1) know about the processing of his/her personal data by the Rights Holder, know the main purposes of their processing; 2) receive, within a reasonable time and without excessive delay or excessive costs, confirmation of the processing of his/her personal data by the Rights Holder, and receive personal data in an understandable form, if the Rights Holder has no legal obstacles to provide such information; 3) seek to correct inaccurate personal data and seek to destroy the

7.2 The subject of personal data may exercise these options by personal contact or by sending a request to: mail@neo-tech.global.

7.3 The request of the User (or its representative) must contain:
details of the User's identity document;
information confirming that the Right Holder is processing the User's personal data;
- user's request;
signature of the User or its representative.

8 RIGHTS OF SUBJECTS OF PERSONAL DATA

8.1 The subject of personal data has the right to receive information relating to the processing of their personal data, including:

confirmation of the fact of processing of personal data;
legal grounds and purposes of personal data processing;
methods of personal data processing used by the Rights Holder;

name and location of the Rights Holder, information about persons (except for employees) who have access to personal data or to whom personal data may be disclosed on the basis of a contract or on the basis of legal requirements;

processed personal data pertaining to the relevant personal data subject, the source of its obtaining, unless another procedure for presentation of such data is provided by the relevant law;

terms of processing of personal data, including the terms of their storage;

the procedure for exercising by the subject of personal data the rights provided by the relevant law;

information on trans-border transfer of personal data that has taken place or is expected to take place;

the name or surname, first name, patronymic and address of the person processing personal data on behalf of the Rights Holder, if the processing is or will be entrusted to such person;

other information required by the Federal Law "On Personal Data" or other applicable laws.

8.2 The subject of personal data has the right to demand from the Rights Holder, by sending a written request, that his/her personal data be clarified, blocked or destroyed if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated processing purpose, and to take measures provided by the relevant laws to protect his/her rights.

8.3 If the User believes that the Rights Holder is processing his/her personal data in violation of the requirements of applicable personal data legislation or otherwise violates his/her rights and freedoms, the User has the right to send a claim to the Rights Holder and, if the Rights Holder fails to act within a reasonable time, to appeal the actions or inaction of the Rights Holder to the relevant authority for the protection of personal data subjects or in court.

9 CONFIDENTIALITY OF PERSONAL DATA

9.1 Information related to personal data, which has become known to the Rights Holder, is confidential information and is protected by law.

9.2 Employees of the Rights Holder and other persons who have access to the processed personal data have signed an obligation on non-disclosure of confidential information, and they have been warned about possible disciplinary, administrative, civil and criminal responsibility in case of violation of norms and requirements of the current legislation in the field of processing of personal data.

9.3 Contracts of the Rights Holder with counterparties contain conditions of confidentiality of personal data transferred and received, including persons engaged for processing of personal data.

10 MEASURES TO ENSURE SECURITY OF PROCESSED PERSONAL DATA

10.1 To ensure the security of the processed personal data, the Licensor shall take the necessary legal, organizational, and technical protection measures.

10.2 The system of protection of personal data of the Rights Holder is based on the principles:

- centrality - the data protection system must be centrally managed;
- timeliness - the measures to ensure the security of personal data applied within the protection system must be timely;
- purposefulness - personal data security measures applied within the protection system must have clear objectives to which they are aimed;
- comprehensiveness - the protection system must include a set of measures aimed at ensuring the security of personal data, complementing and supporting each other;
- preventiveness - personal data security measures applied within the protection system must be preventive in nature;
- reliability - the system of protection of personal data must provide sufficient guarantees to the Right holder that the processed personal data are adequately protected.

10.3 In order to exercise internal control over the compliance of personal data processing with the requirements established by the Rights Holder, periodic inspections of the conditions of personal data processing are organized.

10.4 The Organization takes all necessary organizational, administrative, legal and technical measures when protecting personal data of Users, including:

- Encryption (cryptographic) means.
- Antivirus protection.
- Security analysis.
- Intrusion detection and prevention.
- Access control.
- Registration and accounting.
- Ensuring Integrity.
- Organization of normative and methodical local acts, regulating protection of personal data of Users.

10.5 The procedure of registration of access to the User's personal data includes:

- acquaintance of the employee against signature with this Regulation. If there are other regulations (orders, instructions, etc.) governing the processing and protection of the User's personal data, the employee shall also become acquainted with these acts against his/her signature.
- Requesting a written commitment from the employee (with the exception of the General Director) to respect the confidentiality of the Users' personal data and comply with the rules of its processing in accordance with the internal local acts of the Rights Holder, governing the security of confidential information.

10.6 Organization's employee who has access to personal data of Users in connection with the performance of employment duties:

- Provides storage of information containing personal data of Users, excluding access to them by third parties.
- In the absence of an employee, there shall be no documents containing personal data of Users at his/her workplace.
- When going on vacation, on business trips and in other cases of prolonged absence of an employee from his/her workplace, he/she shall hand over documents and other media containing personal data of Users to a person who will be assigned to perform his/her employment duties by the local act of the Rights Holder (order, instruction).
- If no such person is appointed, documents and other media containing personal data of Users shall be transferred to another employee with access to personal data of Users by order of the General Director of the Rights Holder.
- When an employee having access to personal data of Users is dismissed, documents and other media containing personal data of Users shall be transferred to another employee having access to personal data of Users as directed by the General Director.
- In order to perform the assigned task and on the basis of an official note with a positive resolution of the General Director, access to the User personal data may be granted to another employee. Access to the User's personal data by other employees of the Licensor who do not have duly authorized access is prohibited.

10.7 The person responsible for the processing of personal data shall ensure:

- Familiarizing employees against signature with this Policy.
- Demanding from employees a written commitment to respect the confidentiality of the Users' personal data and to comply with the rules of its processing.
- General control over the compliance of the Employees of the Rights Holder with the measures for the protection of the User's personal data.

10.8 The protection of personal data of Users, stored in electronic databases of the Organization, from unauthorized access, distortion and destruction of information, as well as from other unlawful actions, is provided by the system administrator.

11 LOCATION OF DATABASES OF INFORMATION CONTAINING PERSONAL DATA

11.1 Databases of information containing personal data are located in the Russian Federation.

12 CROSS-BORDER TRANSFER OF PERSONAL DATA

12.1 Personal data shall not be transferred to any legal entities or individuals, but may be transferred subject to compliance with applicable law and this Policy.

13 LIABILITY FOR VIOLATION OF REGULATIONS GOVERNING THE PROCESSING AND PROTECTION OF PERSONAL DATA

13.1 Employees of the Organization, guilty of violation of the rules governing the receipt, processing and protection of personal data shall bear disciplinary, administrative, civil or criminal liability in accordance with applicable laws of the Russian Federation and internal local acts of the Organization.

14 ADDITIONAL PROVISIONS

13.1 This Policy, as well as all amendments hereto shall be approved by the Licensor and shall become effective on the date of its publication on the Website, as specified in this Policy.

13.2 As of the entry into force of this Policy, the previous version of this Policy shall be considered invalid.

BY USING THE WEBSITE I CONFIRM THAT I HAVE READ, AGREE AND ACCEPT THE TERMS OF THIS POLICY

Version as of 19.01.2023