

PERSONAL DATA PROCESSING AND PROTECTION POLICY

This document is an informational English translation of the Russian Personal Data Processing Policy.

In case of discrepancies, the Russian version shall prevail.

Approved: 20.12.2025)

Individual Entrepreneur Ekaterina Sergeevna Bondareva

1. **GENERAL PROVISIONS** 1.1. This Personal Data Processing and Protection Policy (hereinafter, the “Policy”) is adopted by the Individual Entrepreneur Ekaterina Sergeevna Bondareva (hereinafter, the “Operator”) in accordance with Federal Law No. 152-FZ “On Personal Data” dated 27 July 2006 and other applicable legislation governing the processing and protection of personal data. 1.2. The purpose of this Policy is to ensure the protection of the rights and freedoms of individuals when their personal data is processed, including the protection of the right to privacy, personal and family confidentiality. 1.3. This Policy applies to all personal data processed by the Operator in connection with: • the provision of consulting, educational, informational, professional or related services; • communication with clients, website visitors and other subjects of personal data; • the operation of online resources, digital materials and communication tools used by the Operator. 1.4. The Operator ensures compliance with the principles and requirements established by the legislation of the Russian Federation, including ensuring the lawful and fair processing of personal data, confidentiality, data accuracy, relevance, minimization and adequacy in relation to the purposes for which personal data is processed.
2. **PURPOSES OF PERSONAL DATA PROCESSING** 2.1. Personal data is processed for the following purposes: • provision of information and consulting services; • communication with data subjects who voluntarily contact the Operator, including answers to inquiries and other service-related communications; • execution and performance of civil law contracts; • compliance with applicable legal requirements. • improvement of the Operator’s services, quality control, and enhancement of the user experience; 2.2. The Operator processes personal data exclusively for legitimate, specific and predefined purposes.
3. **LEGAL GROUNDS FOR PROCESSING** 3.1. The Operator processes personal data on the following legal grounds: • the data subject’s consent to personal data processing; • the necessity of processing for the performance of a contract to which the data subject is a party; • the necessity to take steps at the request of the data subject prior to entering into a contract; • compliance with obligations established by Russian legislation; • article 6 of Federal Law No. 152-FZ “On Personal Data”. 3.2. If special categories of personal data

are processed, the Operator obtains separate explicit consent from the data subject, unless processing is otherwise permitted by law.

4. CATEGORIES OF PERSONAL DATA PROCESSED 4.1. The Operator may process the following categories of personal data: • identification data (full name); • contact information (telephone number, email address, communication details); • data submitted by the client during consultations, questionnaires or written communication; • any additional information voluntarily submitted by the data subject. 4.2. In certain cases related to contractual relations, additional identification data may be processed as required by law. 4.3. Payment card details and other payment instrument data are processed independently by the credit institution (bank) providing internet acquiring services and are not transferred to or accessed by the Operator. The Operator only provides the data subject with a payment link. 4.4. The Operator does not intentionally collect or process personal data of minors without the lawful consent of their legal representatives.
5. CONDITIONS AND PROCEDURE OF PROCESSING 5.1. Personal data is processed by automated and non-automated means. 5.2. Processing is carried out in accordance with the principles of legality, fairness, confidentiality, accuracy, minimization and integrity. 5.3. The Operator does not disclose personal data to third parties unless: • such disclosure is required by law; • it is necessary for the execution of a contract with the data subject; • the data subject has given explicit consent. 5.4. The Operator ensures that any third parties involved in processing comply with confidentiality obligations and implement appropriate data protection measures. 5.5. Personal data may also be provided voluntarily by the data subject during communication with the Operator, including written correspondence and consultations. 5.6. The Operator does not use built-in data collection forms on the website and does not perform automatic collection of personal data. Personal data is processed only if the data subject voluntarily contacts the Operator via the contact details provided. 5.7. The Operator does not carry out cross-border transfer of personal data. All personal data is processed and stored within the territory of the Russian Federation. 5.8. The Operator ensures the recording, systematization, accumulation, storage, updating and retrieval of personal data of citizens of the Russian Federation using databases located within the territory of the Russian Federation, in accordance with applicable law.”
6. RIGHTS OF THE PERSONAL DATA SUBJECT 6.1. The data subject has the following rights: • the right to receive information regarding the processing of their personal data; • the right to request access to their personal data; • the right to request correction or updating of inaccurate or outdated data; • the right to request the deletion of personal data when legally applicable; • the right to restrict processing in specified cases; • the right to object to processing when permitted by law; • the right to withdraw consent at any time, without affecting the lawfulness of processing prior to withdrawal; • the right to appeal unlawful actions or omissions of the Operator to the competent authority or court. 6.2.

These rights are exercised in accordance with applicable Russian legislation.

7. **OBLIGATIONS OF THE OPERATOR** 7.1. The Operator undertakes to: • process personal data strictly in accordance with applicable legislation; • ensure the confidentiality and security of personal data; • take necessary legal, organizational and technical measures to protect personal data from unauthorized access, alteration, destruction, distribution, and other unlawful acts; • respond to data subject requests in accordance with statutory timeframes; • maintain an internal system of data protection policies and practices. 7.2. Third parties involved in personal data processing may act as processors under the instructions of the Operator and are bound by confidentiality and data protection obligations.
8. **DATA SECURITY MEASURES** 8.1. The Operator implements organizational and technical measures necessary to ensure the security of personal data in accordance with applicable legal requirements. 8.2. Data security measures comply with applicable regulatory requirements.
9. **DATA RETENTION** 9.1. Personal data is stored only for the period necessary to achieve the purposes for which it was collected, unless a longer retention period is required by law. 9.2. Upon expiration of the retention period, personal data is subject to deletion, anonymization or blocking, unless continued storage is legally justified. 9.3. Personal data is destroyed in a manner that prevents its recovery, including deletion from electronic media and physical destruction of paper records, where applicable.
10. **FINAL PROVISIONS** 10.1. This Policy is publicly available and may be updated by the Operator to reflect legislative changes or modifications in processing activities. 10.2. The Operator recommends that data subjects periodically review this Policy. 10.3. Continued use of the Operator's services constitutes acceptance of the terms of this Policy.

This English version is provided for informational purposes only and does not create independent legal obligations separate from the Russian version of the Policy.

Issues related to data destruction, record-keeping, operator details and internal procedures are governed by the Russian version of this Policy.