

Public Personal Data Processing Policy

1. General Provisions

1.1. The data processing policy (hereinafter – the Policy) has been developed in accordance with the Federal Law “On Personal Data” No.152-FZ.

The Policy determines the goals and general principles of personal data processing, as well as the measures for protection of personal data processed by the state budgetary institution Moscow Agency of Innovations (hereinafter – the Operator).

In accordance with the Policy, the Operator collects, uses and protects the personal data that personal data subjects provide to the Operator when using the website/websites owned/administered by the Operator from any device and in any form of communication.

The policy contains the following terms and definitions:

Personal data – any information relating directly or indirectly to a specific or identifiable physical person (personal data subject).

Processing of personal data – the implementation of any action or set of actions in relation to personal data, including gathering, recording, systematizing, accumulating, storing, updating (renewing and altering), retrieving, using, transmitting (disseminating, providing and accessing), blocking, deleting and destroying of personal data both with and without the use of automated personal data processing systems.

Personal data subject – an individual whose personal data is subject to protection in accordance with the current legislation of the Russian Federation.

This Policy is a public document of the Operator and is publicly accessible at the Operator's website/websites for review by all persons in accordance with Part 2 of Art. 18.1. Federal Law No. 152-FZ.

2. Procedure and Scope of Personal Data Processing

The processing of personal data by the Operator is based on the following principles:

- legality and fairness;
- restrictions on the processing of personal data by achieving specific, predetermined and legitimate purposes;
- preventing the processing of personal data that is incompatible with the purposes of their collecting;
- prevention of combining the databases containing personal data, the processing of which is performed for purposes incompatible with each other;
- processing only those personal data that meet the purposes of their processing;
- compliance of the content and volume of processed personal data with the stated purposes of their processing;
- preventing the processing of excessive personal data concerning the stated purposes of their processing;
- ensuring the accuracy, sufficiency and relevance of personal data concerning the stated purposes of their processing;
- elimination or depersonalization of personal data upon the achievement of the purposes of processing or in case of loss of necessity to achieve these purposes, if it is impossible to eliminate the committed

violations of personal data by the Operator, unless otherwise provided by Federal Law.

The operator processes the following personal data:

- personal data provided by the personal data subject when filling out forms on the Operator's website/websites, including filling out contact forms, signing up for a newsletter, and registering for events;
- personal data and other information contained in messages that the personal data subject sends/addresses directly to the Operator;
- personal data provided by the personal data subject through the Operator's website/websites in response to information on vacancies and internships;
- technical data automatically transmitted by the device with which the website/websites are accessed, including the device's technical characteristics, IP address, cookies, browser information, date and time of access to the website, addresses of requested pages and other similar information;
- other data about the personal data subject that he or she left on the Operator's website/websites.

The operator processes personal data exclusively for the purposes for which they were provided, including:

- registration of the personal data subject on the Operator's website/websites to provide access to its/their individual sections;
- providing the personal data subject with information about the Operator, its services and activities;
- communication with the personal data subject when he/she contacts the Operator;
- organizing the participation of the personal data subject in events and surveys conducted by the Operator;
- sending the Operator's news publications to the personal data subject ;
- fulfillment of powers and duties assigned to the Operator by the legislation of the Russian Federation;
- for other purposes, with the consent of the personal data subject, indicating the purposes of processing upon the receipt of consent.

The Operator processes technical data in order to:

- ensure the functioning and security of the website/websites owned or administered by the Operator;
- improve the quality of the website/websites owned or administered by the Operator.

3. Cookies

The Operator may use cookies, which are automatically downloaded to the subject's device and store information about the user interface settings in accordance with the preferences of the personal data subject. The subject has the right to change settings of the devices belonging to him/her in order to disable the storage of cookies or delete them.

4. Confidentiality of Personal Data

The Operator and other persons who have gained access to personal data are required not to disclose to third parties and not to distribute personal data without the consent of the personal data subject , unless otherwise provided by Federal Law.

The Operator does not store personal data in publicly accessible sources. The Operator does not make decisions that cause legal consequences for personal data subjects or otherwise affect their rights and legitimate interests based on automated processing of their personal data.

5. Processing of Personal Data by Third Parties

The Operator has the right to entrust the processing of personal data to another party with the consent

of the subject of personal data, unless otherwise provided by Federal Law, on the basis of an agreement concluded with this party. The party that processes personal data on behalf of the Operator is required to comply with the principles and rules for the processing of personal data provided for in Federal Law No. 152 and this Policy.

6. Cross-Border Transfer of Personal Data

The Operator is obliged to make sure that the foreign state into whose territory the personal data is expected to be transferred provides adequate protection of the rights of the subjects of personal data before such a transfer begins.

Cross-border transfer of personal data on the territory of foreign states that do not provide adequate protection of the rights of personal data subjects may be performed:

- with the written consent of the personal data subject authorizing the cross-border transfer of his/her personal data;
- as part of an agreement to which the personal data subject is a Party.

7. Rights of the Personal Data Subject

7.1. In order to protect the rights and freedoms of the personal data subject, the Operator, at the request of the personal data subject in writing:

- confirms the processing of personal data of the subject requesting information in relation to him/herself;
- provides the personal data subject an opportunity to get acquainted with his/her personal data held by the Operator within 30 days from the date of the receipt of a written request;
- informs the personal data subject about the source and content of his/her personal data, which the Operator processes;
- informs the personal data subject about the legal grounds, goals, terms and methods of processing his personal data;
- makes necessary changes to personal data if the personal data subject confirms that they are incomplete, inaccurate or outdated, within 7 business days from the date of the receipt of confirmation, and notifies the personal data subject of the changes;
- provides the personal data subject with the names and addresses of organizations who have access to his/her personal data (if the Operator has such information) and to whom personal data may be disclosed with the consent of the personal data subject;
- provides the personal data subject with the full names and job titles of persons who, with the consent of the personal data subject, may be entrusted with the processing of his/her personal data;
- notifies the personal data subject on the procedure for exercising his/her rights when the Operator processes his/her personal data;
- excludes the personal data subject from the Operator's newsletters or other mass emails;
- terminates the processing of personal data within 30 days from the date of receipt of the withdrawal of consent, if there are no other legal grounds for the processing of personal data provided for by the legislation of the Russian Federation;
- terminates the processing of personal data if it is confirmed that the Operator is processing them unlawfully, and notifies the personal data subject about the measures taken;
- destroys personal data if it is confirmed that they were illegally obtained or do not meet the declared processing goals, within 7 business days from the date of receipt of the corresponding confirmation, and notifies the data subject about the measures taken;
- answers other questions regarding personal processed by the Operator.

The Operator does not process personal data in order to promote goods on the market through direct

contacts with the personal data subject (potential consumer) or engage him/her in a political campaign.

If the personal data subject believes that the Operator is processing his/her personal data in violation of the requirements of Federal Law No. 152 or otherwise violates his/her rights and freedoms, the personal data subject has the right to appeal the actions or omissions of the Operator through a relevant authority or in court.

7.2. Terminating the processing of personal data.

The operator stops processing personal data:

- upon the occurrence of conditions for the termination of the processing of personal data or after the expiration of established periods;
- upon reaching the goals of their processing or in case of loss of the need to achieve these goals;
- at the request of the personal data subject, if the processed personal data is illegally obtained or is not necessary for the stated purpose of processing;
- in case of revealing illegal processing of personal data, if it is impossible to ensure the legitimacy of processing;
- upon the expiration of the personal data subject's consent to the processing of his/her personal data or in the event of a withdrawal of such consent, if there are no other legal grounds for the processing of personal data provided for by the legislation of the Russian Federation;
- in case of the liquidation of the Operator.

8. Personal Data Security

The security of personal data processed by the Operator is ensured by the implementation of legal, organizational and technical measures necessary to ensure the requirements of the federal legislation in the field of personal data protection.

To prevent unauthorized access to personal data, the following organizational and technical measures are applied by the Operator:

- assigning employees responsible for organizing the processing and protection of personal data;
- limiting the number of persons admitted to the processing of personal data;
- providing subjects with the requirements of the federal legislation and the Operator's regulations for the processing and protection of personal data;
- differentiating user access to information resources and data processing tools;
- registering and tracking the actions of users of personal data information systems;
- using antivirus and recovery tools for the protection of personal data;
- using, if necessary, firewalls and intrusion detection tools;
- controlling access to the Operator's territory and guarding premises hosting equipment for processing personal data.

The Operator takes necessary and sufficient legal, organizational and technical measures to protect personal data from illegal or accidental access, destruction, alteration, blocking, copying, provision, distribution, as well as from other illegal actions in relation to personal data.

9. Final Provisions

Other rights and obligations of the Operator in connection with the processing of personal data are determined by the relevant legislation of the Russian Federation.

The Operator's employees guilty of violating the rules governing the processing and protection of personal data bear material, disciplinary, administrative, civil or criminal liability in the manner

prescribed by federal laws.

The website/websites owned or administered by the Operator may contain links to third-party websites and services that the Operator does not control.

The operator is not responsible for the security or confidentiality of any information collected by third-party websites or services.

The operator may update the Policy regarding personal data as necessary (including due to changes in the legislation on personal data).

The use/continued use of the Operator's website/websites by the personal data subject after this Policy has been updated means that the subject agrees to the changes.