

## **PRIVACY POLICY OF INCAB GROUP**

### **1. GENERAL PROVISIONS**

This Policy defines the procedure for the processing of personal data and measures to ensure the security of personal data in Incab Group (hereinafter referred to as the Operator) in order to protect the rights and freedoms of a person and citizen in the processing of their personal data, including the protection of privacy rights, personal and family secrets.

The Policy uses the following basic concepts:

- automated processing of personal data – processing of personal data using computer equipment;
- blocking of personal data – temporary suspension of personal data processing (except the cases when processing is required to specify personal data);
- personal data information system – a set of personal data contained in databases and information technologies and technical means ensuring their processing
- depersonalization of personal data – actions that make it impossible to determine that personal data belong to a specific personal data subject without the use of additional information
- personal data processing – any action (operation) or a set of actions (operations) performed with the use of automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, specification (update, change), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;
- operator – a state body, municipal body, legal or natural person, independently or jointly with other persons organizing and (or) processing personal data, as well as determining the purposes of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data
- personal data – any information relating to a directly or indirectly determined or defined individual (subject of personal data);
- provision of personal data – actions aimed at disclosing personal data to a specific person or a particular group of persons;

- distribution (publication) of personal data – actions aimed at disclosing personal data to an indefinite number of persons (transfer of personal data) or to get acquainted with personal data of an unlimited number of persons, including public disclosure of personal data in the media, placement in information and telecommunication networks or providing access to personal data in some other way;
- destruction of personal data – actions, as a result of which it is impossible to restore the content of personal data in the information system of personal data and (or) as a result of which the material carriers of personal data are destroyed.

The Company is obliged to publish or otherwise provide unrestricted access to this Policy of personal data processing.

## **2. PRINCIPLES AND CONDITIONS OF PERSONAL DATA PROCESSING**

### **2.1. The processing of personal data by the Operator is carried out on the basis of the following principles:**

- legality and fair foundations;
- processing of personal data is restricted to the achievement of specific, predetermined and legitimate purposes;
- preventing the processing of personal data that is incompatible with the purposes of collecting personal data;
- preventing the merging of databases containing personal data that are processed for the purposes that are incompatible with each other;
- processing only those personal data that meet the purposes of their processing;
- compliance of the content and volume of personal data processed with the declared processing purposes;
- preventing the processing of personal data that are redundant in relation to the declared purposes of their processing;
- ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of personal data processing;
- destruction or depersonalization of personal data upon achieving the purposes of their processing or in case of loss of the need to achieve these purposes, if it is impossible for the Operator to eliminate the violations of personal data, unless otherwise provided by federal law.

### **2.2. Conditions for processing personal data**

The Operator processes personal data in the presence of at least one of the following conditions:

- the processing of personal data is carried out with the consent of the subject of personal data to the processing of his personal data;
- the processing of personal data is necessary for the execution of the contract the party to which or the beneficiary or the guarantor under which the subject of personal data is, and also for entering into a contract upon the initiative of the

subject of personal data or a contract under which the subject of personal data will be the beneficiary or the guarantor;

- the processing of personal data is necessary for the exercise of the rights and legitimate interests of the Operator or third parties, or for achieving socially significant goals, provided that this does not violate the rights and freedoms of the subject of personal data;
- processing of personal data the access of an unlimited range of persons to which is provided by the subject of personal data or at his request is carried out (hereinafter referred to as the generally accessible personal data).

### **2.3. Confidentiality of personal data**

The Operator and other persons who have obtained access to personal data shall not disclose personal data to third parties and distribute them without the consent of the subject of personal data.

### **2.4. Generally accessible sources of personal data**

For informational support, the Operator may create generally accessible sources of personal data of subjects, including reference books and address books. With the written consent of the subject, generally accessible sources of personal data may include his last name, first name, patronymic name, date and place of birth, position, contact telephone numbers, email address and other personal data provided by the subject of personal data. Information about the subject should be at any time excluded from generally accessible sources of personal data at the request of the subject, or by decision of a court or other authorized government bodies.

### **2.5. Special categories of personal data**

The processing of special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, health status, or intimate life by the Operator is allowed if:

- the subject of personal data has given a written consent to the processing of his personal data;
- personal data have been made generally accessible by the subject of personal data;
- the processing of personal data is necessary to protect the life, health or other vital interests of the subject of personal data or the life, health or other vital interests of other persons, and obtaining the consent of the subject of personal data is impossible;
- the processing of personal data is carried out for medical and preventive purposes, in order to establish a medical diagnosis or provide medical and medical and social services, provided that the processing of personal data is carried out by a person who is professionally engaged in medical activities and statutorily required to keep medical secrecy;

- the processing of personal data is necessary to establish or exercise the rights of the subject of personal data or third parties, as well as in connection with the administration of justice;
- the processing of personal data is carried out under the legislation on mandatory types of insurance and the insurance legislation.

The processing of special categories of personal data shall be immediately terminated if the reasons for processing them have been eliminated, unless otherwise provided by law. The processing of personal data on criminal record can be carried out by the Operator only in cases and in the manner determined in accordance with the laws.

## **2.6. Assignment of the processing of personal data to another person**

The Operator is entitled to entrust the processing of personal data to another person with the consent of the subject of personal data, unless otherwise provided by law, on the basis of an agreement with this person. The person who processes personal data on behalf of the Operator is obliged to comply with the principles and rules for the processing of personal data.

## **2.7. Cross-border transfer of personal data**

The operator shall ensure that a foreign state to the territory of which it is intended to transfer personal data provides adequate protection of the rights of the subjects of personal data before such transfer is carried out.

The cross-border transfer of personal data on the territory of foreign states that do not provide adequate protection of the rights of the subjects of personal data may be carried out in the following cases:

- there is the written consent of the subject of personal data to the cross-border transfer of his personal data;
- execution of the contract to which the subject of personal data is a party.

## **3. RIGHTS OF THE SUBJECT OF PERSONAL DATA**

### **3.1. Consent of the subject of personal data to the processing of his personal data**

The subject of personal data decides on the submission of his personal data and gives consent to their processing on his own free will and for his own benefit. The subject of personal data or his representative may give a consent to the processing of personal data in any form allowing to confirm the fact of its receipt, unless otherwise provided by law. The obligation to provide evidence of obtaining the consent of the subject of personal data to the processing of his personal data or proof of the availability of the grounds remains with the Operator.

### **3.2. Rights of the subject of personal data**

The subject of personal data has the right to receive information regarding the processing of his personal data from the Operator, if such a right is not restricted by the laws. The subject of personal data is entitled to require from the Operator to clarify his personal data, to block or

destroy them if the personal data are incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as to take measures provided by law to protect his rights. The processing of personal data in order to promote goods, works, services on the market by making direct contacts with a potential customer using means of communication, as well as for political campaigns, is allowed only with the prior consent of the subject of personal data. This processing of personal data shall be deemed to be carried out without the prior consent of the subject of personal data, unless the Company proves that such consent has been obtained. The Operator shall immediately cease, at the request of the subject of personal data, the processing of his personal data for the above purposes. It is forbidden to make decisions based solely on the automated processing of personal data that give rise to legal consequences in relation to the subject of personal data or otherwise affect his rights and legitimate interests, except in cases provided for by federal laws, or if there is a written consent of the subject of personal data. If the subject of personal data believes that the Operator processes its personal data in breach of the law or otherwise violates its rights and freedoms, the subject of personal data is entitled to appeal against the Operator's actions or inactions to an Authorized Body for the Protection of Subjects of Personal Data or a court of law. The subject of personal data has the right to protect his rights and legitimate interests, including compensation of damages and (or) compensation for moral damage in court.

#### **4. PROVISION OF THE SECURITY OF PERSONAL DATA**

The security of personal data processed by the Operator is ensured by the implementation of legal, organizational and technical measures required to meet the legal requirements in the field of personal data protection. To prevent unauthorized access to personal data, the Operator applies the following organizational and technical measures:

- appointment of officials responsible for organizing the processing and protection of personal data;
- limitation of the number of persons who have access to personal data;
- familiarization of the subjects with the requirements of the legislation and regulatory documents of the Operator concerning the processing and protection of personal data;
- organization of recording, storage and circulation of media;
- identification of threats to the security of personal data during their processing, the formation of threat models on their basis;
- development of the personal data protection system based on a threat model;
- verification of the readiness and effectiveness of the use of information security tools;
- control of user access to information resources and software and hardware for information processing;
- registration and recording of actions of users of personal data information systems;
- use of antivirus tools and recovery tools for personal data protection system;
- use of firewalling, intrusion detection, security analysis and cryptographic information protection if necessary;
- organization of access control on the territory of the Operator, protection of premises with technical means for processing personal data.