

## PERSONAL DATA PRIVACY POLICY

### 1. General Provisions

1.1. This Personal Data Processing Policy (the "Policy") developed and applied by Formika Event Limited Liability Company, abbreviated name of Formika Event LLC (hereinafter also - "Operator") in accordance with the Federal Law of 27.07.2006 N 152-FZ "On Personal Data" (as amended), Federal Law of 13.03.2006 N 38-FZ "On Advertising" (with amendments and additions), and other regulations in the field of personal data protection applicable in the territory of the Russian Federation.

1.2. This Policy is part of the general policy regarding processing of personal data of Formika Event LLC.

1.3. This Policy shall apply to all personal data that may be obtained from individuals by the Operator through the <https://expo.innoprom.com> website (the "Site"), by filling in registration forms, at events held by the Operator, and which may be unambiguously correlated with a specific individual and his personal data. This Policy does not apply to relations:

- arising when processing personal data of the Operator's employees, since such relations are regulated by a separate local act of Formika Event LLC;
- arising when processing personal data when registering participants at the INNOPROM International Trade Fair in Yekaterinburg;
- relations to which Federal Law N 152-FZ "On Personal Data" does not apply (item 2, Article 1).

1.4. The Policy defines the behavior of the Operator with respect to processing of personal data accepted for processing, procedure and conditions for processing personal data of individuals who have transferred their personal data for processing to the Operator (hereinafter also - "Personal Data Subject," "Subject") using and without the use of automation tools, establishes procedures aimed at preventing violations of the legislation of the Russian Federation, eliminating the consequences of such violations related to the processing of personal data.

1.5. The Policy is developed to ensure protection of rights and freedoms of Personal Data Subjects when processing their personal data, as well as to establish liability of Operator's officials having access to personal data of Personal Data Subjects for non-compliance with requirements and standards governing personal data processing.

1.6. The Operator shall process the following personal data:

- last name, first name;
- position;
- telephone number;
- e-mail address;

1.7. When using the services of the Site, the Operator also processes other impersonal data that are automatically transmitted during the use of the Site through the software installed on the computer:

- Information about the browser used (or other program used to access the site);
- IP address;
- Cookie data.

The Operator guarantees that organizations external to the Operator do not have access to such data that may be used by the Operator, except for cases explicitly stipulated by the current legislation of the Russian Federation and this Policy. Upon receipt of personal data not specified in this section, such data shall be immediately destroyed.

1.8. The Operator shall process personal data of Personal Data Subjects by maintaining databases by automated, mechanical, manual methods in order to:

1.8.1. in case of express consent of the Personal Data Subject, in order to process applications for the Operator's services, maintenance of communication, notification of actions, events, marketing campaigns of the Operator.

1.8.2. for other purposes, if the relevant actions of the Operator do not contradict the current legislation, the Operator's activities, and the consent of the Personal Data Subject is obtained to carry out the specified processing.

1.8.3. data specified in item 1.7. This Policy is processed for the purpose of analyzing the Site, tracking and understanding the principles of using the Site by visitors, improving the functioning of the Site, solving technical problems of the Site, developing new products, expanding services, identifying the popularity of events and determining the effectiveness of advertising campaigns; security and fraud prevention.

1.9. The Operator shall process personal data by performing any action (operation) or set of actions (operations), including the following:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- clarification (update, change);
- extraction;
- use;
- transmission (distribution, provision, access);
- depersonalization;
- blocking;
- deletion;
- destruction.

## 2. Acquisition, use and disclosure of personal data

2.1. The Operator shall receive and begin processing personal data of the Subject from the moment of obtaining its consent.

Consent to personal data processing may be given by the Personal Data Subject in any form that allows to confirm the fact of obtaining consent, unless otherwise established by federal law: in written, oral or other form provided for by the current legislation, including by performing implicative actions by the

Personal Data Subject. If the Personal Data Subject does not agree to processing his/her personal data, such processing shall not be performed.

2.2. Personal data of Personal Data Subjects shall be obtained by the Operator:

- by personal transfer of personal data by the Subject when entering information into the accounting forms in writing on paper when registering at the Operator's events;
- by personal transfer of personal data by the Subject when entering information into accounting forms in electronic form on the Site;
- in other ways that do not contradict the legislation of the Russian Federation and the requirements of international legislation on personal data protection.

2.3. Consent to personal data processing shall be deemed to be provided by performing any action or combination of the following actions by the Personal Data Subject:

- complete the document in hard copy when registering at the Operator's events;
- order on the Operator's Website;
- Mark on the Site in the appropriate form consent to processing of personal data to the extent, for the purposes and in the manner provided for in the proposed text before obtaining consent for information.

2.4. The Consent shall be deemed to have been received in accordance with the established procedure and shall be valid until the Personal Data Subject sends the relevant application on termination of personal data processing at the Operator's location.

2.5. The personal data subject may at any time withdraw his consent to personal data processing provided that such procedure does not violate the requirements of the legislation of the Russian Federation.

In order to withdraw consent to personal data processing, the Personal Data Subject shall send a written notice to the postal address: 5, p. 1, Tessinsky Lane, Moscow, 109028, Russian Federation, or by e-mail [info@innoprom.com](mailto:info@innoprom.com)

If the Personal Data Subject withdraws its consent to processing of its personal data, the Operator shall stop processing them or ensure termination of such processing (if processing is carried out by another person acting on behalf of the Operator) and if the preservation of personal data is no longer required for the purposes of processing, destroy personal data or ensure its destruction (if personal data is processed by another person acting on behalf of the Operator) within a period not exceeding thirty (30) days from the date of receipt of said withdrawal, unless otherwise provided by the agreement to which the Personal Data Subject is a party, beneficiary or guarantor, any other agreement between the Operator and the Personal Data Subject, or if the Operator is not entitled to process personal data without the consent of the Personal Data Subject on the grounds; provided by Federal Law N 152-FZ "On Personal Data" of 27.07.2006 or other federal laws.

### 3. Rules and Procedure for Personal Data Processing

3.1. In order to achieve the objectives of this Policy, only those employees of the Operator who are assigned such duty in accordance with their official (employment) duties are allowed to process personal data. The Operator requires its employees to observe confidentiality and security of personal data when processing them.

3.2. In accordance with this Policy, the Operator may process personal data independently, as well as with the involvement of third parties, who are engaged by the Operator and carry out processing for the purposes specified in this Policy.

3.3. In case of an order to process personal data to a third party, the amount of personal data transferred to a third party for processing personal data and the number of processing methods used by such person shall be minimum necessary to perform their duties to the Operator. With regard to the processing of personal data by a third party, the obligation of such person to observe the confidentiality of personal data and ensure the security of personal data during its processing is established.

The Operator shall store personal information of Personal Data Subjects in accordance with the effective legislation of the Russian Federation.

3.4. In relation to personal information of the Personal Data Subject, confidentiality shall be retained, except in cases of voluntary provision by the Subject of information about itself for general access to an unlimited circle of persons. In this case, the Personal Data Subject agrees that a certain part of his personal information becomes publicly available.

#### 4. Information on Personal Data Protection Requirements to be Implemented

4.1. The Operator's personal data processing activities are inextricably connected with the Operator's protection of confidentiality of the received information.

4.2. The Operator shall require other persons who have gained access to personal data 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.

4.3. All employees of the Operator shall ensure confidentiality of personal data, as well as other information established by the Operator, if this does not contradict the current legislation of the Russian Federation.

4.4. In order to ensure security of personal data during processing, the Operator shall take necessary and sufficient legal, organizational and technical measures to protect personal data from illegal or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in respect of them. The Operator shall ensure that all implemented measures for organizational and technical protection of personal data are carried out legally, including in accordance with the requirements of the legislation of the Russian Federation on personal data processing.

4.5. The Operator shall apply necessary and sufficient legal, organizational and technical measures to ensure personal data security, including:

- identification of personal data security threats during their processing in personal data information systems;
- application of organizational and technical measures to ensure personal data security during processing in personal data information systems, necessary for fulfillment of requirements to personal data protection, execution of which ensures levels of personal data protection established by the Government of the Russian Federation;
- Use of information protection tools that have passed the procedure for assessment of compliance with the established procedure;

- assessment of effectiveness of measures taken to ensure personal data security prior to commissioning of personal data information system;
- accounting of personal data media;
- detection of unauthorized access to personal data and taking measures;
- restoration of personal data modified or destroyed due to unauthorized access to them;
- carrying out measures aimed at preventing unauthorized access to personal data and (or) transferring them to persons without the right of access to such information;
- timely detection of unauthorized access to personal data and taking necessary measures;
- prevention of influence on technical means of automated processing of personal data, as a result of which their functioning may be disrupted;
- establishment of rules of access to personal data processed in the personal data information system, as well as ensuring registration and accounting of all actions performed with personal data in the personal data information system;
- monitoring of measures taken to ensure personal data security and level of protection of personal data information systems.

Measures to ensure personal data security implemented by the Operator within the framework of personal data protection system taking into account current threats to personal data security and used information technologies include:

- identification and authentication of access subjects and access objects;
- control of access of access subjects to access objects;
- limitation of the software environment;
- protection of machine storage media where personal data is stored and/or processed;
- recording of safety events;
- antivirus protection;
- intrusion detection (prevention);
- ensuring integrity of the information system and personal data;
- Virtualization environment protection;
- protection of technical means;
- protection of the information system, its means, communication and data transmission systems;
- identification of incidents (one event or group of events) that may lead to failures or disruption of the functioning of the information system and (or) to the occurrence of threats to personal data security, and response to them;
- configuration management of the information system and personal data protection system.

4.6 In order to ensure compliance of the level of personal data protection with the requirements of the Federal Law dated 27.07.2006 N 152-FZ "On Personal Data" and the Federal Law dated 27.07.2006 N 149-

FZ "On Information, Information Technologies and Information Protection," the Operator does not disclose information on specific tools and measures used to ensure information security of personal data.

4.7. The Operator shall not disclose the information received from the Personal Data Subject. The Operator shall not be considered as a violation of provision of information to agents and third parties acting on the basis of the agreement with the Operator for fulfillment of obligations to the Personal Data Subject. Shall not be deemed a breach of any obligation to disclose information in accordance with the reasonable and applicable requirements of the law. In order to store contacts that have left an application for services, the Operator transfers personal data to Amocrm JSC (TIN: 7709477879).

4.8. In case of personal data leakage, the Operator:

- Notify Roskomnadzor within 24 hours;
- within 72 hours conducts its own investigation and notifies Roskomnadzor of its results.

5. Consent to receive advertising information on telecommunication networks

5.1. By leaving an application for distribution/subscribing to receive advertising information:

- at registration at the event held by the Organizer, by filling in the corresponding document on paper;
- on the Website, by ticking the Personal Data Subject on the corresponding web page;

means the consent of the Personal Data Subject to receive from the Operator and third parties engaged by the Operator via telecommunication networks (via the provided mobile phone number and e-mail address) information messages, including commercial advertising (advertising) information specified in Clause 1.8.2. of this Policy.

5.2. Giving the consent specified in Clause 5.1. of this Policy, the Personal Data Subject confirms that it acts at its own will and in its interest, as well as that the specified personal data are reliable.

6. Final Provisions

6.1. The Operator may amend this Privacy Policy. The operator recommends that you review the Privacy Policy regularly.

6.2. The Privacy Policy shall become effective from the moment it is posted on the Site, unless otherwise provided by the new version of the Privacy Policy.

6.3. The current version of the Policy is publicly available at: <https://expo.innoprom.com>

6.4. Any suggestions or questions regarding this Privacy Policy should be addressed to: [info@innoprom.com](mailto:info@innoprom.com)