

POLICY
on the processing and protection of personal data of
SanteDom Limited Trade Development

I. GENERAL TERMS

1.1. In compliance with the legislation of the Russian Federation governing relations related to the processing and security of personal data, and to uphold its business reputation, SanteDom Limited Trade Development (hereinafter referred to as SanteDom LTD) prioritizes adherence to the principles of legality, fairness, and confidentiality in the processing of personal data, as well as ensuring the security of its processing procedures.

1.2. This policy on the processing and protection of personal data at SanteDom LTD:

1.2.1. Discloses the main categories of personal data processed by SanteDom LTD, the purposes, methods, and principles of personal data processing, the rights and obligations of SanteDom LTD in processing personal data, and the rights of data subjects;

1.2.2. Is a publicly available document that outlines the conceptual framework of SanteDom LTD's activities in personal data processing.

1.3. Terms and definitions used in this Policy:

Personal Data (hereinafter - PD) should mean any information relating directly or indirectly to a specific or identifiable natural person (subject of personal data).

Personal Data Subject (Subject) should mean a natural person who is directly or indirectly defined or identifiable by means of Personal Data.

Operator should mean a state body, municipal body, legal entity or natural person, independently or jointly with other persons organizing and (or) processing personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data. Operator: SanteDom LTD.

Personal data processing should mean any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Automated personal data processing should mean the personal data processing by means of computer technology.

Personal data information system (hereinafter - PDIS) should mean a set of personal data contained in databases and information technologies and technical means that ensure their processing.

Information carrier should mean any material object or medium used for storing or transmitting information.

Personal data provision should mean actions aimed at disclosing personal data to a certain person or certain people.

Personal data dissemination should mean actions aimed at dissemination of personal data to the public.

Special categories of personal data should mean categories of personal data concerning race, nationality, political opinions, religious or philosophical beliefs, health, intimacy.

Access to information (Access) should mean obtaining information, its processing, in particular, copying, modification or destruction of information.

Unauthorized access (UA) should mean access to information stored on various types of media (paper, magnetic, optical, etc.) in computer databases, file stores, archives, restricted areas, etc. of various organizations by changing (enhancing, falsifying) their access rights.

Personal data blocking should mean the temporary termination of the personal data processing (except in cases where the processing is necessary to clarify personal data).

Cross—border personal data transfer should mean the personal data transfer to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

Personal data destruction should mean actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which the tangible carriers of personal data are destroyed.

1.4. Basic rights of subjects of personal data:

1.4.1. The subject of personal data has the right to receive information about the processing of his/her personal data at SanteDom LTD, including information about: confirmation of the fact of personal data processing; legal grounds and purposes of personal data processing; applied methods of personal data processing; terms of personal data processing, including the terms of their storage; information about realized or expected trans-border data transfers; other information provided by federal laws.

1.4.2. The personal data subject has the right to demand that SanteDom LTD block or destroy their personal data if such data is incomplete, outdated, inaccurate, unlawfully obtained, or cannot be considered necessary for the stated purpose of processing, as well as to take legally prescribed measures to protect their rights.

1.4.3. The right of the subject of personal data to access their personal data may be restricted in accordance with federal laws;

1.4.4. To exercise their rights and protect their legitimate interests, the data subject has the right to contact SanteDom LTD. It reviews any requests and complaints from data subjects, thoroughly investigates violations, and takes all necessary measures for their immediate resolution, punishing the responsible parties and settling disputed and conflict situations out of court.

1.4.5. The personal data subject has the right to challenge the actions or inaction of SanteDom LTD by filing a complaint with the authorized body for the protection of the rights of personal data subjects (the territorial office of the Federal Service for Supervision of Communications, Information Technology, and Mass Media).

1.4.6. The subject of personal data has the right to protect their rights and legitimate interests, including compensation for losses and/or compensation for moral damage in court.

1.5. SanteDom LTD has the right to: defend its interests in court; disclose data of the subjects to third parties, if provided by the current legislation; refuse to provide personal data in cases provided by the legislation; use personal data of the subject without their consent in cases provided by the legislation.

1.6. The main obligations of SanteDom LTD include:

1.6.1. Compliance with Russian legislation on the processing and protection of personal data. Maintaining the confidentiality of personal data by not disclosing it to third parties without the consent of the data subject, unless otherwise required by federal law.

1.6.2. When collecting personal data, SanteDom LTD shall provide the personal data subject, upon their request, with the information stipulated by paragraph 7 of Article 14 of the Federal Law as of 27.07.2006 No. 152-FZ "On Personal Data";

1.6.3. If the provision of personal data is mandatory in accordance with federal law, employees of SanteDom LTD are obliged to explain to the subject of personal data the legal consequences of refusal to provide their personal data;

1.6.4. When collecting personal data, including through the information and telecommunications network Internet, SanteDom LTD shall ensure the recording, systematization, accumulation, storage, clarification (updating, modification), and retrieval of personal data of citizens of the Russian Federation using databases located within the territory of the Russian Federation.

1.6.5. Publish or otherwise provide unrestricted access to the current document defining the policy of SanteDom LTD with regard to personal data processing, to the information on the implemented requirements for personal data protection;

1.6.6. To adopt or ensure the adoption of the necessary legal, organizational and technical measures to protect personal data from unlawful or accidental access;

1.6.7. To inform the data subject or their representative of the existence of personal data relating to the data subject concerned and, at the request of the data subject or their representative, to provide them with an opportunity to familiarize themselves with such personal data;

1.6.8. Clarify, block or destroy personal data of the subjects if it is incomplete, outdated, inaccurate, unlawfully obtained or not recognized as necessary for the stated purpose of processing;

1.6.9. Stop processing personal data if the subject of personal data withdraws consent to the processing of their personal data. SanteDom LTD is entitled to continue processing personal data without the subject's consent if grounds exist under clauses 2–11 of part 1 of Article 6 and part 2 of Article 10 of Federal Law No. 152-FZ "On Personal Data" dated 27 July 2006.

II. PURPOSES OF PERSONAL DATA COLLECTION

2.1. SanteDom LTD processes personal data of the following categories of personal data subjects (hereinafter referred to as "subjects"):

- 2.1.1. Employees.
- 2.1.2. Employees' family members.
- 2.1.3. Recipients of payments related to employees. (Recipients of alimony payments)
- 2.1.4. Trainees.
- 2.1.5. Dismissed employees.
- 2.1.6. Applicants for vacant positions.
- 2.1.7. Citizens (consumers).
- 2.1.8. Counterparties (individuals).
- 2.1.9. Representatives/employees of contractors (legal entities).
- 2.1.10. Users of Internet resources of SanteDom LTD.
- 2.1.11. SanteDom LTD owners.
- 2.1.12. Participants of LTD events.
- 2.1.13. Participants of lawsuits and enforcement proceedings involving SanteDom LTD
- 2.1.14. Consignors and consignees.

2.2. SanteDom LTD processes **employees'** personal data solely for the following purposes: maintaining personnel and accounting records; ensuring compliance with the labor legislation of the Russian Federation; ensuring compliance with the tax legislation of the Russian Federation; ensuring compliance with the pension legislation of the Russian Federation; ensuring compliance with the legislation on state social assistance of the Russian Federation; ensuring compliance with the insurance legislation of the Russian Federation; conducting statistical accounting; ensuring compliance with the legislation of the Russian Federation in the field of healthcare; ensuring compliance with the legislation of the Russian Federation on defense; ensuring compliance with the legislation of the Russian Federation on transport security; ensuring compliance with the legislation of the Russian Federation on enforcement proceedings; participation of an individual in civil, administrative proceedings, or proceedings in arbitration courts; preparation, conclusion, and execution of civil-law contracts; execution of judicial acts; ensuring access control on the premises of SanteDom LTD.

2.3. SanteDom LTD processes personal data of **employees' family members** solely for the following purposes: keeping personnel records; keeping military records; ensuring compliance with the tax legislation of the Russian Federation; execution of a judicial act;

2.4. SanteDom LTD processes personal data of **beneficiaries of employee-related payments** solely for the following purposes: execution of a judicial act.

2.5. SanteDom LTD processes personal data of **trainees** solely for the following purposes: to ensure access control on the territory of SanteDom LTD; to ensure the completion of familiarization, industrial or pre-graduation practice on the basis of an agreement with an educational institution;

2.6. SanteDom LTD processes personal data of **dismissed employees** solely for the following purposes: personnel and accounting records;



2.7. SanteDom LTD processes personal data of **applicants for vacant positions** solely for the following purposes: recruitment of personnel (applicants) for vacant positions of SanteDom LTD;

2.8. SanteDom LTD processes personal data of **citizens (consumers)** solely for the following purposes: promotion of goods on the market;

2.9. SanteDom LTD processes personal data of **contractors (individuals)** solely for the following purposes: preparation, conclusion and execution of civil-law contracts; ensuring access control to the territory of SanteDom LTD;

2.10. SanteDom LTD processes personal data of **representatives/employees of counterparties (legal entities)** solely for the following purposes: preparation, conclusion and fulfillment of obligations under contracts; identification of parties to contracts, agreements, transactions of the Company;

2.11. SanteDom LTD processes personal data of **users of Internet resources** solely for the following purposes: promotion of goods on the market;

2.12. SanteDom LTD processes personal data of the **Company's owners** solely for the following purposes: preparation and holding of corporate events (general meetings of participants, etc.), provision of information on the beneficial owners at the request of state authorities and organizations within the framework of the Company's business activities, to provide guarantees for the Company to financial institutions.

2.13. SanteDom LTD processes personal data of the **participants of the Company's events** solely for the purpose of: promotion of goods on the market;

2.14. SanteDom LTD processes personal data of **participants of legal proceedings and enforcement proceedings in which the Company is involved** solely for the following purposes: participation of the Company in civil, administrative and arbitration court proceedings; execution of judicial acts;

2.15. SanteDom LTD processes personal data of **consignors and consignees** solely for the following purposes: ensuring access control to the territory of SanteDom LTD; fulfillment of obligations under civil law contracts;

III. LEGAL BASIS FOR PROCESSING PERSONAL DATA

3.1. The legal basis for personal data processing is a set of legal acts, in pursuance of which and in accordance with which SanteDom LTD processes personal data. Personal data processing by SanteDom LTD is carried out in accordance with the following legal grounds:

3.1.1. Constitution of the Russian Federation dated 25 December 1993;

3.1.2. Labor Code of the Russian Federation No. 197-FZ dated 30 December 2001;

3.1.3. Civil Code of the Russian Federation No. 51-FZ dated 30 November 1994;

3.1.4. Criminal Code of the Russian Federation No. 63-FZ dated 13 June 1996;

3.1.5. Code of Administrative Offenses of the Russian Federation No. 195-FZ dated 30 December 2001;

3.1.6. Tax Code of the Russian Federation Part One No. 146-FZ dated 31 July 1998 and Part Two No. 117-FZ dated 5 August 2000 (as amended);

3.1.7. Federal Law No. 109-FZ "On Migration Registration of Foreign Citizens and Stateless Persons in the Russian Federation" dated 18 July 2006;



3.1.8. Federal Law No. 273-FZ “On Education in the Russian Federation” dated 29 December 2012;

3.1.9. Federal Law No. 323-FZ “On the Fundamentals of Protecting the Health of Citizens in the Russian Federation” dated 21 November 2011;

3.1.10. Federal Law No. 442-FZ “On the Fundamentals of Social Services for Citizens in the Russian Federation” dated 28 December 2013;

3.1.11. Order of the Ministry of Health of Russia No. 29n dated 28 January 2021 (as amended on 1 February 2022) “On Approval of the Procedure for Conducting Mandatory Preliminary and Periodic Medical Examinations of Employees, as Stipulated by Part Four of Article 213 of the Labor Code of the Russian Federation, the List of Medical Contraindications to Work with Harmful and/or Hazardous Production Factors, and Types of Work Requiring Mandatory Preliminary and Periodic Medical Examinations”; Resolution of the Board of the Pension Fund of the Russian Federation No. 192p dated 31 July 2006 “On the Forms of Documents for Individual (Personalized) Record-Keeping in the Mandatory Pension Insurance System and Instructions for Their Completion”.

3.1.12. Federal Law No. 59-FZ dated 2 May 2006 “On the Procedure for Considering Appeals from Citizens of the Russian Federation”;

3.1.13. Order of the Ministry of Education and Science of the Russian Federation No. 291 dated 18 April 2013 “On Approval of the Regulations on Practical Training for Students Mastering Basic Professional Educational Programs of Secondary Vocational Education”;

3.1.14. Federal Law No. 326-FZ dated 29 November 2010 “On Compulsory Health Insurance in the Russian Federation”;

3.1.15. Federal Law No. 63-FZ dated 6 April 2011 “On Electronic Signatures”;

3.1.16. Federal Law No. 402-FZ dated 6 December 2011 “On Accounting”;

3.1.17. Federal law dated 01.04.1996No. 27-FZ; “On Individual (Personalized) Accounting in the Mandatory Pension Insurance System”.

3.1.18. SanteDom LTD Articles of Association;

3.1.19. Labor contracts with employees;

3.1.20. Contracts of civil law nature concluded between SanteDom LTD and the subject of personal data;

3.1.21. Consents of the subjects to the processing of personal data.

IV. SCOPE AND CATEGORIES OF PROCESSED PERSONAL DATA, CATEGORIES OF PERSONAL DATA SUBJECTS

4.1. The content and scope of the personal data of the Data Subjects processed corresponds to the stated purposes of processing.

4.2. Within the framework of processing personal data of **employees**, the minimum necessary categories of personal data are processed to the extent required by the applicable laws of the Russian Federation, including the following information:

- last name, first name, patronymic;
- sex
- citizenship;
- date (date, month, year) and place of birth (country, republic, territory, region, district, city, town, settlement, village, other settlement);
- information about the place of residence (postal code, country, republic, territory, region, district, city, town, village, other settlement, street, house, building, apartment);



- information on registration at the place of residence or stay (postal code, country, republic, territory, region, district, city, town, settlement, village, other settlement, street, house, building, apartment);
- contact information (phone number: home, mobile; e-mail address);
- taxpayer identification number (date, place of registration, date of issuance of the certificate);
- Personal Insurance Policy Number (SNILS);
- information on education (name of educational organization, date of graduation, specialty, qualification, details of the document on education and qualification);
- information on obtaining additional professional education (date, location, program, details of documents issued based on the results);
- information on employment (names of organizations and positions held, duration of work in these organizations), including the presence of encouragements, awards, and (or) disciplinary penalties;
- information on marital status (marriage status, since when, details of the marriage certificate), presence of children (details of the birth certificate);
- passport or other identity document data (series, number, date of issue, issuing authority);
- information on military registration (reserve category, military rank, profile, military specialty, category of fitness for military service);
- disability information;
- alimony withholding information;
- information on income from previous employment;
- other personal data provided by employees in accordance with the requirements of labor legislation;

4.2. Within the processing of personal data of **employees' family members**, the minimum necessary set of personal data categories is processed in the scope required by the current legislation of the Russian Federation, within the limits of approved forms of personnel records management and accounting, including the following information:

- last name, first name, patronymic;
- degree of relationship;
- date and place of birth;
- place and address of employment;
- residence address;
- information on registration at the place of residence or stay;
- other personal data provided by employees in accordance with the requirements of labor legislation.

4.4. The following information is processed as part of the processing of personal data of **employee-related** benefit recipients:

- last name, first name, patronymic;
- date and place of birth;
- account number;

4.5. The following information is processed as part of the processing of **trainees'** personal data:



- last name, first name, patronymic;
 - date of birth;
 - passport information;
 - information on the educational organization;
 - information about the internship and (or) practice (familiarization, industrial, pre-diploma);
- 4.6. As part of the processing of personal data of **dismissed employees**, the following information is processed:
- last name, first name, patronymic;
 - sex;
 - citizenship;
 - date (date, month, year) and place of birth (country, republic, territory, region, district, city, town, settlement, village, other settlement);
 - information about the place of residence (postal code, country, republic, territory, region, district, city, town, village, other settlement, street, house, building, apartment);
 - information on registration at the place of residence or stay (postal code, country, republic, territory, region, district, city, town, settlement, village, other settlement, street, house, building, apartment);
 - contact information (phone number: home, mobile; e-mail address);
 - taxpayer identification number (date, place of registration, date of issuance of the certificate);
 - Personal Insurance Policy Number (SNILS);
 - information on education (name of educational organization, date of graduation, specialty, qualification, details of the document on education and qualification);
 - information on obtaining additional professional education (date, location, program, details of documents issued based on the results);
 - information on employment (names of organizations and positions held, duration of work in these organizations), including the presence of encouragements, awards, and (or) disciplinary penalties;
 - information on marital status (marriage status, since when, details of the marriage certificate), presence of children (details of the birth certificate);
 - passport or other identity document data (series, number, date of issue, issuing authority);
 - information on military registration (reserve category, military rank, profile, military specialty, category of fitness for military service);
 - disability information;
 - alimony withholding information;
 - information on income from previous employment;
- 4.7. Within the framework of personal data processing of **applicants for vacant positions**, the following information is processed:
- surname, name, patronymic;
 - sex;
 - citizenship;
 - date (date, month, year) and place of birth (country, republic, territory, region, district, city, town, settlement, village, other settlement);



- information about the place of residence (postal code, country, republic, territory, region, district, city, town, village, other settlement, street, house, building, apartment);
- information on registration at the place of residence or stay (postal code, country, republic, territory, region, district, city, town, settlement, village, other settlement, street, house, building, apartment);
- contact information (phone number: home, mobile; e-mail address);
- information on education (name of educational organization, date of graduation, specialty, qualification, details of the document on education and qualification);
- information on obtaining additional professional education (date, location, program, details of documents issued based on the results);
- information on employment (names of organizations and positions held, duration of work in these organizations), including the presence of encouragements, awards, and (or) disciplinary penalties;
- information on marital status (marriage status, since when), presence of children;
- disability information;

4.8. Within the framework of personal data processing of **citizens (consumers)**, the following information is processed:

- surname, name;
- contact information (phone number, e-mail address);
- address (location);

4.9. Within the framework of processing of personal data of **counterparties (individuals)** the following information is processed:

- last name, first name, patronymic;
- date of birth;
- place of birth;
- passport information;
- registration of a place of residence;
- contact info;
- taxpayer identification number;
- Personal Insurance Policy Number (SNILS);
- bank details;
- other personal data necessary for the conclusion and execution of contracts;

4.10. Within the framework of personal data processing of **representatives/employees of counterparties (legal entities)** the following information is processed:

- last name, first name, patronymic;
- passport information;
- contact info;
- position held;
- other personal data necessary for the conclusion and execution of contracts;

4.11. Within the framework of processing of personal data of **users of the Operator's Internet resources** the following information is processed:

- last name, first name, patronymic;
- contact information (phone number, e-mail address);
- IP address;
- cookie info;



- information about the user's browser (or another program used to access the service);
- address of the requested service page;
- address of the previously visited page of the Internet service;
- files uploaded by the user themselves for personal use;
- device location information;
- the device's camera data;
- device information (operating system version, advertising identifiers, unique application identifiers);

4.12. Within the scope of the processing of personal data of the **owners of SanteDom LTD**, the following information is processed:

- last name, first name, patronymic;
- address of registration;
- contact info;
- passport information;

4.13. Within the framework of personal data processing of the **participants of the events of SanteDom LTD**, the following information is processed:

- last name, first name, patronymic;
- contact information (phone number, e-mail address);
- address (location);

4.14. Within the framework of personal data **processing of participants of legal proceedings and enforcement proceedings in which SanteDom LTD is involved**, the following data is processed:

- last name, first name, patronymic;
- date and place of birth;
- passport information;
- residence address;
- address of registration;
- taxpayer identification number;
- bank details

4.15. Within the framework of personal data processing of **consignors and consignees**, the following information is processed:

- last name, first name, patronymic;
- date and place of birth;
- passport information.

4.16. SanteDom LTD does not process biometric personal data (information that characterizes physiological and biological features of a person, on the basis of which it is possible to establish their identity and which is used to establish the identity of the subject of personal data).

4.17. SanteDom LTD does not process special categories of personal data concerning race, nationality, political opinions, religious or philosophical beliefs, health status, intimate life.

4.18. SanteDom LTD processes special categories of personal data related to health solely for the purposes necessary for the investigation and recording of industrial accidents according to the forms approved by the legislation.

V. PROCEDURE AND CONDITIONS OF PERSONAL DATA PROCESSING

5.1. SanteDom LTD processes personal data using automated means or without the use of such means, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (provision, access), depersonalization, blocking, deletion, and destruction of personal data.

5.2. SanteDom LTD processes personal data in compliance with the requirements of the legislation of the Russian Federation.

5.3. The processing of personal data at SanteDom LTD is carried out with the consent of the subjects of personal data to process their personal data, as well as without such consent in cases provided for by the legislation of the Russian Federation. The consent of the personal data subject is formalized in written form, unless otherwise established by the Federal Law "On Personal Data".

5.4. The processing of biometric personal data (photographs of employees) is performed without the use of automated means.

5.5. SanteDom LTD carries out cross-border transfer of personal data (to the territory of a foreign state, to a foreign government authority, foreign individual, or foreign legal entity).

5.6. Publicly available sources of personal data (website, information board) are maintained at SanteDom LTD. Personal data (surname, name, patronymic, position, qualifications, year of birth, etc.) provided by the subject (employee/citizen) are included in such sources only with the written consent of the personal data subject.

5.7. SanteDom LTD collects, records, systematizes, accumulates, and clarifies (updates, modifies) personal data by obtaining such data directly from the subjects of personal data (or their legal representatives).

5.8. SanteDom LTD and its employees with access to personal data are obligated not to disclose personal data to third parties or disseminate it without the consent of the personal data subject, unless otherwise stipulated by federal law.

5.9. SanteDom LTD is authorized to transfer personal data to investigative and inquiry authorities, as well as other authorized bodies, on grounds established by the current legislation of the Russian Federation.

5.10. If the provision of personal data is mandatory under federal law, the SanteDom LTD employee collecting (receiving) such data directly from the personal data subject must explain the legal consequences of refusing to provide it.

5.11. SanteDom LTD ensures compliance with the principles of personal data processing outlined in Article 5 of Federal Law No. 152-FZ "On Personal Data".

5.12. SanteDom LTD implements the measures specified in Part 2 of Article 18.1 and Part 1 of Article 19 of Federal Law No. 152-FZ "On Personal Data".

5.13. SanteDom LTD does not use databases located outside the borders of the Russian Federation for processing personal data.

5.14. Conditions for termination of personal data processing by SanteDom LTD:



- achievement of the purposes of personal data processing;
- loss of legal grounds for personal data processing;
- expiration of the consent term or withdrawal of consent by the personal data subject for processing their personal data;
- identification of unlawful processing of personal data.

5.15. The retention period of personal data in a form that allows identification of the personal data subject is maintained no longer than required by the purposes of personal data processing, except in cases where the retention period is established by federal law, a contract to which the personal data subject is a party, beneficiary, or guarantor.

5.16. SanteDom LTD has implemented the necessary legal, organizational, and technical measures for processing personal data and has fulfilled personal data protection requirements, including:

- identifying threats to personal data security during their processing in personal data information systems;
- organizational and technical measures are taken to ensure the security of personal data during their processing in personal data information systems, which are necessary to meet the requirements of personal data protection, the implementation of which ensures the level of personal data protection established by the Government of the Russian Federation;
- utilizing information protection tools that have undergone conformity assessment procedures;
- evaluating the effectiveness of security measures prior to commissioning personal data information systems;
- record-keeping of machine carriers of personal data;
- detecting instances of unauthorized access to personal data and taking corrective actions;
- restoring personal data modified or destroyed due to unauthorized access;
- establishing access rules for personal data processed in the information system and ensuring the logging and recording of all actions performed on personal data within the system;
- monitoring the implemented security measures and the security level of personal data information systems.

5.17. SanteDom LTD, in compliance with the legislation of the Russian Federation, to achieve the purposes of processing, and in the interests of and with the consent of personal data subjects, provides personal data to the following organizations during its activities:

- The Federal Tax Service.
- The Pension Fund of Russia.
- Non-state pension funds.
- Insurance companies.
- Credit institutions.
- Licensing and/or supervisory bodies of state authorities and local self-government.

VI. UPDATING, CORRECTION, DELETION AND DESTRUCTION OF PERSONAL DATA, RESPONDING TO REQUESTS OF SUBJECTS FOR ACCESS TO PERSONAL DATA

6.1. SanteDom LTD, in the event of identifying unlawful processing of personal data, blocks the unlawfully processed personal data.

6.2. If inaccurate personal data is detected, SanteDom LTD blocks the relevant personal data for the verification period. Upon confirmation of inaccuracies in the personal data, based on information provided by the personal data subject or their representative, the authorized body for the protection of the rights of personal data subjects, or other necessary documents, SanteDom LTD updates the personal data and lifts the blocking.

6.3. SanteDom LTD is obligated to inform the personal data subject or their representative about the processing of their personal data upon the latter's request.

6.4. Information related to the processing of personal data is provided to the personal data subject or their representative upon receipt of a request of the personal data subject or their representative. The request may be submitted in the form of an electronic document signed with an electronic signature in accordance with the legislation of the Russian Federation.

6.5. Examination of the requests of the persons concerned or their representatives, as well as of the competent authority for the protection of the rights of the persons concerned:

6.5.1. Personal data subjects have the right to obtain information related to the processing of their personal data, including:

- confirmation of the fact that SanteDom LTD processes their personal data;
- the legal grounds and purposes of personal data processing;
- the methods of personal data processing employed by SanteDom LTD;
- The personal data being processed that pertains to the respective subject, the source of its acquisition (unless a different procedure for presenting such data is stipulated by federal law);
- The timeframes for processing personal data, including their retention periods at SanteDom LTD;
- The procedure for the personal data subject to exercise rights granted by the legislation of the Russian Federation in the field of personal data;
- Other information stipulated by the legislation of the Russian Federation in the field of personal data.

6.5.2. Upon receiving a request from a personal data subject, their representative, or the authorized body for the protection of personal data subjects' rights, SanteDom LTD provides the required information within the timeframes stipulated by Article 20 of Federal Law No. 152-FZ "On Personal Data" dated 27 July 2006.

6.6. Personal data subjects have the right to demand that SanteDom LTD clarify, block, or destroy their personal data if such data is incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the stated processing purposes, as well as to take legal measures to protect their rights.

6.7. The right of a personal data subject to access their personal data may be restricted in accordance with federal laws, including cases where such access violates the rights and legitimate interests of third parties.



6.8. To obtain the information related to the processing of personal data described in clause 6.5.1 of this Policy, the subject (or their legal representative) must fill out the relevant request form for personal data processing information (Annex 1 or 5) and submit it in person to SanteDom LTD employees responsible for handling citizen inquiries or send it by mail.

6.9. To clarify specific personal data, the subject (or their legal representative) must fill out the relevant request form for personal data clarification (Annex 2 or 6) and submit it in person to SanteDom LTD employees responsible for handling citizen inquiries or send it by mail.

6.10. To contest the lawfulness of personal data processing, the subject (or their legal representative) must fill out the relevant request form for personal data destruction (Annex 3 or 7) and submit it in person to SanteDom LTD employees responsible for handling citizen inquiries or send it by mail.

6.11. To withdraw consent for the processing of personal data, the subject (or their legal representative) must fill out the relevant form for withdrawal of consent to personal data processing (Annex 4 or 8) and submit it in person to SanteDom LTD employees responsible for handling citizen inquiries or send it by mail. If consent for personal data processing is withdrawn, SanteDom LTD retains the right to continue processing personal data without the subject's consent if grounds exist under clauses 2–11 of part 1 of Article 6, part 2 of Article 10, and part 2 of Article 11 of Federal Law No. 152-FZ "On Personal Data" dated 27 July 2006.

6.12. Personal data shall be destroyed upon achieving the purposes of processing or upon withdrawal of consent by the personal data subject, unless:

6.12.1. Otherwise stipulated by a contract to which the subject is a party, beneficiary, or guarantor;

6.12.2. Otherwise provided by another agreement between SanteDom LTD and the subject.

6.13. Upon receiving a request from the personal data subject, their representative, or the authorized body for the protection of personal data subjects' rights to eliminate violations of the law committed during processing, or to clarify, block, or destroy personal data, SanteDom LTD implements appropriate measures and notifies about the actions taken within the timeframes stipulated by Article 21 of Federal Law No. 152-FZ "On Personal Data" dated 27 July 2006.

VII. FINAL PROVISIONS

7.1. This Policy is an internal document of SanteDom LTD, is publicly available, and must be displayed on the information board/official website of SanteDom LTD.

7.2. This Policy is subject to amendment or revision in the event of new legislative acts or specific regulatory documents on the processing and protection of personal data, but no less than once every three years.



7.3. Compliance with the requirements of this Policy is overseen by the officer responsible for organizing the processing of personal data at SanteDom LTD.

7.4. The liability of SanteDom LTD officers with access to personal data for failure to comply with regulations governing the processing and protection of personal data is determined in accordance with the legislation of the Russian Federation and the internal documents of SanteDom LTD.