

# Privacy and Personal Data Processing Policy

This document, "Privacy and Personal Data Processing Policy" (hereinafter referred to as the "Policy"), outlines the rules for the use of personal information of users by PROPTech COMPANY LLC (hereinafter referred to as the "Company").

## 1. \*\*General Provisions of the Policy\*\*

1.1. This Policy applies to all information that the Company and/or its affiliated entities, including all persons belonging to the same group as the Company, may receive about the user during their use of any of the Company's websites, services, programs, and products (hereinafter referred to as "Services"), as well as during the execution by the Company / its affiliated entities of any agreements and contracts concluded with the user in connection with the use of the Services. The user's consent to provide personal data (personal information) given by them in accordance with this Policy within the framework of relations with one of the entities belonging to the Company's group applies to all entities within this group.

1.2. The Company is the Operator for the processing of personal data as defined by Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006.

1.3. By registering on the Company's websites (including <https://proptech.digital>) and/or filling out forms requiring the entry of personal data, the User voluntarily and in their own interest provides written consent for the following methods of processing their personal data in accordance with the terms defined by this document: collection, recording, systematization, accumulation, storage, updating (modification, change), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data.

1.4. This Policy, including the interpretation of its provisions and the procedure for adoption, execution, amendment, and termination, is governed by the legislation of the Russian Federation.

1.5. Terms and definitions used in this Policy are interpreted in accordance with the current legislation of the Russian Federation, business practices, or scientific doctrine.

1.6. For the purposes of this Policy, "User" refers to any individual who visits the Company's websites and provides personal data using information and telecommunication networks.

1.7. This Policy applies to all websites of the Company where its text is posted.

1.8. Using the Services implies the User's unconditional consent to this Policy and the terms of processing their personal information as specified herein, including the actions provided for in paragraph 3 of part 1 of Article 3 of Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006, both with and without the use of automation tools, and confirms that by giving such consent, they act freely, by their own will and in their own interest; if the user disagrees with these terms, they must refrain from using the Services.

## 2. **\*\*Personal Information\*\***

### 2.1. Personal information in this Policy means:

2.1.1. Personal data that Users provide to the Company by filling out information fields on the websites, including when filling out the contact form or subscribing to newsletters:

- Last name, first name, middle name;
- Email address;
- Phone numbers;
- Data about the applicant's legal entity.

### 2.2. In addition to personal information, the Company collects technical data, namely:

Technical data automatically transmitted by the device through which Users access the websites, including the device's technical characteristics, IP address, information stored in "cookies" sent to the User's device, browser information, date and time of access to the website, addresses of requested pages, and other similar information.

## 3. **\*\*Purposes and Methods of Data Processing\*\***

### 3.1. The Company processes Users' personal data solely for the purposes for which they were provided, including:

- Registering Users to provide access to specific sections of the website;
- Providing Users with information about the Company, its services, and events;
- Improving the quality of Services, their usability, developing new Services and offerings;
- Communicating with the User when they contact the Company;
- Organizing Users' participation in events and surveys;
- Sending Users news materials about the Company;
- Targeting advertising materials based on contextual data analysis;
- Conducting statistical and other research based on anonymized data;
- Fulfilling the powers and obligations imposed on the Company by the legislation of the Russian Federation;
- Other purposes with the User's consent.

### 3.2. The Company processes technical data to:

- Ensure the functioning and security of the websites;
- Improve the quality of the websites.

The Company does not publish Users' personal data in publicly accessible sources. The Company does not make decisions that entail legal consequences for Users or otherwise affect their rights and legitimate interests based solely on the automated processing of personal data.

### 3.3. Personal data storage is carried out in a form that allows the identification of the personal data subject for no longer than is required for the purposes of their

processing, unless a longer storage period is established by applicable law. Personal data is subject to destruction or anonymization upon achieving the processing purposes or in case of loss of necessity to achieve these purposes, unless otherwise provided by applicable law.

3.4. For communication with the User regarding the use of services and offerings, the Company may use communication via messenger applications and social networks on the internet, provided the User has provided identifying information.

#### 4. **\*\*User Rights\*\***

4.1. Ensuring the protection of personal data subjects' rights is a fundamental principle of the Company's work in this area.

4.2. To ensure the protection of Users' rights and freedoms, the Company may, at the User's request:

- Confirm the processing of the User's personal data and provide an opportunity to review it within 30 days from the date of the request;
- Inform about the source of obtaining and the composition of the User's personal data processed by the Company;
- Inform about the legal grounds, purposes, terms, and methods of processing the User's personal data;
- Make necessary changes to personal data if the User confirms that it is incomplete, inaccurate, or outdated within 7 business days from the date of confirmation, and notify the User of the changes made;
- Provide the name or last name, first name, middle name, and address of persons to whom the User's personal data may be entrusted with the User's consent;
- Exclude the User from receiving news, informational materials;
- Cease processing the User's personal data within 30 days from the date of consent withdrawal, if there are no other legal grounds for processing the personal data as provided by the legislation of the Russian Federation;
- Cease processing the User's personal data if it is confirmed that the processing is unlawful and notify the User of the measures taken;
- Destroy the User's personal data if it is confirmed that it was illegally obtained or does not meet the stated processing purposes within 7 business days from the date of receipt of the corresponding confirmation and notify the User of the measures taken;
- Answer the User's questions regarding their personal data processed by the Company.

#### 5. **\*\*Ways to Contact the Company\*\***

5.1. The User can contact the Company with a request regarding personal data processing by sending an email with the subject "Personal Data Request" (or "Consent Withdrawal for Personal Data Processing" in case of withdrawal of consent) to [info@kaizen.run](mailto:info@kaizen.run).

## 6. **\*\*Personal Data Security\*\***

6.1. To ensure the security of Users' personal data during their processing, the Company undertakes to take necessary and sufficient legal, organizational, and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, copying, provision, dissemination, as well as from other unlawful actions concerning personal data.

6.2. To ensure adequate protection of personal data, the Company assesses the harm that may be caused in case of personal data security breaches and determines current threats to personal data security during processing in information systems.

6.3. Company employees with access to personal data are familiar with this Policy and local acts on personal data security issues.

## 7. **\*\*Cross-Border Transfer of Personal Data\*\***

7.1. The Company does not transfer Users' personal data to foreign countries. The Company takes all necessary measures to ensure the confidentiality and security of personal data.

7.2. Cross-border transfer of personal data to foreign countries is carried out only with the User's written consent or to execute a contract to which the User is a party, as well as in other cases provided by the legislation of the Russian Federation on personal data.

## 8. **\*\*Termination of Personal Data Processing\*\***

8.1. The Company ceases processing the User's personal data:

- Upon the occurrence of conditions for terminating the processing of personal data or upon the expiration of established terms;
- Upon achieving the purposes of their processing or in case of loss of necessity to achieve these purposes;
- At the User's request if the personal data processed is unlawfully obtained or is not necessary for the declared processing purpose;
- In case of identifying unlawful processing of personal data if it is impossible to ensure lawful processing;
- Upon the expiration of the User's consent for personal data processing or in case of withdrawal of such consent if there are no other legal grounds for processing the personal data as provided by the legislation of the Russian Federation;
- In case of the Company's liquidation.

## 9. **\*\*Links to Third-Party Websites\*\***

9.1. The Company's websites may contain links to third-party websites and services that it does not control. The Company is not responsible for the security or confidentiality of any information collected by third-party websites or services.

## 10. **\*\*Policy Changes\*\***

10.1. The Company may update the Policy as necessary. The Company recommends that Users periodically check the relevance of this Policy. By continuing

to use the website after the Policy changes, the User confirms their agreement with the changes made.

10.2. Any changes to the Company's personal data processing policy will be reflected in this document. The Policy is valid indefinitely until replaced by a new version.

10.3. The current version of the

Policy is freely available on the internet at <https://proptech.digital/privacy/>\*\*