

APPROVE
General manager
FAREXPO LLC.
_____/ O.I. Shost
May 22, 2025

Policy on the processing of personal data in
FAREXPO LLC

Saint-Petersburg, Russian Federation

1. This document defines the policy of FAREXPO LLC (hereinafter referred to as the *Society*) regarding the processing of personal data carried out by the *Company* as an operator, and also contains information on the implemented requirements for the protection of personal data.

2. The processing of personal data in the *Company* is carried out in accordance with the legislation of the Russian Federation, including the Constitution of the Russian Federation, the Civil Code of the Russian Federation, the Labor Code of the Russian Federation, the Federal Law of the Russian Federation of 06.04.2011 No. 149-FZ "On Information, Information Technologies and the Protection of Information", the Federal Law of the Russian Federation of 27.07.2006 No. 152-FZ "On Personal Data", the Decree of the Government of the Russian Federation of 15.09.2008 No. 687 "On Approval of the Regulation on the Features of Processing Personal Data Carried Out Without the Use of Automation Tools", the Decree of the Government of the Russian Federation of 01.11.2012 No. 1119 "On Approval of Requirements for the Protection of Personal Data When Processing Them in Personal Data Information Systems", and other regulatory legal acts.

3. The processing of personal data in the *Company* is carried out for the following **purposes**: Promotion of goods, works, services on the market. Maintenance of personnel and accounting records.

3.1. provision of services in accordance with the types of activities of the *Company*:

- **categories of subjects whose personal data are processed:** clients;
- **categories of personal data processed:** other categories of personal data;
- **list of personal data processed:** last name, first name, patronymic; contact phone numbers; email address, regional affiliation, position, name of organization;
- **methods of processing personal data:** processing of personal data of subjects is carried out using automation tools and without the use of automation tools;
- **processing period (excluding storage):** until the purpose of processing personal data is achieved;
- **processing (storage) period:** from 3 years, until requested.
- **procedure for destruction of personal data:** to achieve the purpose of processing personal data, the destruction of personal data of subjects is carried out by a commission created on the basis of the order of the head of the *Company*, by removing, erasing, chopping, burning, mechanical destruction, handing over for disposal to special organizations, etc. in accordance with the "Instructions for the destruction of personal data in FAREXPO LLC".

3.2. registration and execution of contractual and pre-contractual relations:

- **categories of subjects whose personal data are processed:** counterparties of individual entrepreneurs; individuals; employees of counterparties: individual entrepreneurs, legal entities;
- **categories of personal data processed:** other categories of personal data;
- **list of personal data processed:** last name, first name, patronymic; year, month, date of birth; place of birth; passport details; TIN; details of the state pension insurance certificate (SNILS); address of place of registration; address of actual residence; telephone number; place of work; position; e-mail; bank account details; marital status; number of children.
- **methods of processing personal data:** the processing of personal data of subjects is carried out using automation tools and without the use of automation tools;
- **processing period (excluding storage):** until the purpose of processing personal data is achieved;

- **processing (storage) period:** from 3 years on demand.

- **procedure for destruction of personal data:** upon achieving the purpose of processing personal data, the destruction of personal data of subjects is carried out by a commission created on the basis of the order of the head of the *Company*, by means of removal, erasure, chopping, burning, mechanical destruction, delivery for disposal to special organizations, etc. in accordance with the “Instructions for the destruction of personal data in FAREXPO LLC”.

3.3. compliance with the requirements of the legislation imposed on the Company as an employer:

- **categories of subjects whose personal data are processed:** employees, former employees;

- **categories of personal data processed:** Publicly available

- **list of personal data processed:** surname, name, patronymic; year, month, date of birth; place of birth; registration and residential address; passport details; contact phone number; marital status; information about immediate relatives; social status; education; profession; qualification; TIN of an individual; details of military registration documents; details of the state pension insurance certificate; details of work activity (details of the work book); details of benefits; details of awards.

- **methods of processing personal data:** the processing of personal data of subjects is carried out using automation tools and without the use of automation tools;

- **processing period (excluding storage):** until the purpose of processing personal data is achieved;

- **processing (storage) period:** from 3 years until demand.

- **procedure for destruction of personal data:** upon achieving the purpose of processing personal data, the destruction of personal data of subjects is carried out by a commission created on the basis of an order of the head of the *Company*, by means of removal, erasure, chopping, burning, mechanical destruction, delivery for disposal to special organizations, etc. (indicate the method used to destroy personal data), in accordance with the “Instructions for the destruction of personal data at FAREXPO LLC”.

4. The *Company* processes personal data in compliance with the principles established by law, namely:

- personal data are processed lawfully and fairly;

- only those personal data are processed that meet the purposes of their processing;

- it is not permitted to combine databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other;

- the content and volume of the personal data being processed correspond to the stated purposes of processing. The personal data being processed are not excessive in relation to the stated purposes of their processing;

- when processing personal data, their accuracy, sufficiency, and, where necessary, relevance in relation to the purposes of processing personal data are ensured;

- personal data is stored in a form that allows the subject of personal data to be identified, no longer than required by the purposes of processing, unless the storage period for personal data is established by law, an agreement to which the subject of personal data is a party, beneficiary or guarantor.

Information on the implemented requirements for the protection of personal data

5. In order to fulfill the obligations stipulated by the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data", the RF Government Resolution of 15.09.2008 No. 687 "On Approval of the Regulation on the Peculiarities of Personal Data Processing Carried Out Without the Use of Automation Tools", the RF Government Resolution of 01.11.2012 No. 1119 "On Approval of Requirements for the Protection of Personal Data When Processing Them in Personal Data Information Systems", the *Company*, as an operator processing personal data, takes the following measures:

- ✓ the *Company* has appointed persons responsible for: organizing the processing of personal data; implementing measures to ensure conditions for the safety of personal data and preventing unauthorized access to them; ensuring the security of personal data in the information system;
- ✓ the Company has approved local regulations on the processing of personal data, as well as local regulations establishing procedures aimed at preventing and identifying violations of the legislation of the Russian Federation and eliminating the consequences of such violations;
- ✓ legal, organizational and technical measures provided for by the relevant regulatory legal acts have been taken to ensure the security of personal data when they are processed in the personal data information system(s) of the *Company*;
- ✓ the requirements established by the Decree of the Government of the Russian Federation of September 15, 2008 No. 687 “On approval of the Regulation on the specifics of personal data processing carried out without the use of automation tools” are met when processing personal data carried out without the use of automation tools;
- ✓ internal control and audit of compliance of personal data processing with the established requirements in the *Company* is carried out by conducting periodic checks of the conditions for processing personal data;
- ✓ the reception and processing of requests and inquiries from personal data subjects or their representatives is organized;
- ✓ the *Company's* employees directly involved in the processing of personal data are familiarized with the provisions of the legislation of the Russian Federation on personal data (including the requirements for the protection of personal data), and local acts on issues of processing personal data.

6. Information about the *Company* is included in the register of operators processing personal data (registration number 7082336, entry date 05/22/2025).

Responsible for organizing
the processing of personal data

_____/N.A. Golmakova/
(signature) (initials, surname)

In accordance with Part 2 of Article 18.1 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data", the Operator publishes this document for familiarization with it by an unlimited number of persons by posting it on the official website (in the case of collecting personal data using the Internet, including on the pages of the website through which the personal data is collected).