

AI ALLIANCE
RUSSIA

APPROVED

Director

(osition)

A handwritten signature in blue ink, appearing to read 'N.V. Maltseva', written over a horizontal line.

(signature)

N.V. Maltseva

(full name)

September 17, 2024

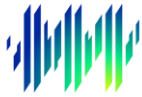
ASSOCIATION “ALLIANCE IN THE SOURCE OF RESEARCH INTELLIGENCE»

Personal data processing policy

Moscow

1. General Provisions

- 1.1. This Policy of the ASSOCIATION “ALLIANCE IN THE SOURCE OF RESEARCH INTELLIGENCE” with regard to the processing of personal data (hereinafter - the Policy) is developed in fulfillment of the requirements of p. 2 para. 2 ч. 1 part 1 of Article 18.1 of the Federal Law dated 27.07.2006 N 152-FZ “On Personal Data” (hereinafter - the Law on Personal Data) in order to ensure the protection of human and civil rights and freedoms in the processing of personal data, including the protection of the right to privacy, personal and family secrecy. The Policy applies to all personal data processed by the ASSOCIATION “ALLIANCE IN RESEARCH INTELLIGENCE” (hereinafter referred to as the Operator, ASSOCIATION).
- 1.2. The Policy applies to the relations in the field of personal data processing arisen at the Operator both before and after the approval of this Policy.
- 1.3. Pursuant to the requirements of part 2 of Article 18.1 of the Law on Personal Data, this Policy is published on the Operator's website in free access in the information and telecommunication network Internet.
- 1.4. Basic concepts used in the Policy:
personal data - any information relating to a directly or indirectly defined or identifiable



natural person (subject of personal data);

personal data operator (operator) - a state authority, municipal authority, legal entity or individual, independently or jointly with other persons organizing and (or) carrying out processing of personal data, as well as determining the purposes of personal data processing, composition of personal data subject to processing, actions (operations) performed with personal data;

processing of personal data - any action (operation) or set of actions (operations) with personal data, performed with or without the use of means of automation. Processing of personal data includes, but is not limited to:

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

automated processing of personal data - processing of personal data by means of computer equipment;

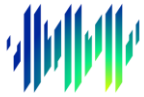
dissemination of personal data - actions aimed at disclosure of personal data to an indefinite number of persons;

provision of personal data - actions aimed at disclosure of personal data to a certain person or a certain circle of persons;

blocking of personal data - temporary cessation of personal data processing (except for cases when processing is necessary to clarify personal data);

destruction of personal data - actions, as a result of which it becomes impossible to restore the content of personal data in the information system of personal data and (or) as a result of which material carriers of personal data are destroyed;

depersonalization of personal data - actions, as a result of which it becomes impossible to determine the belonging of personal data to a particular subject of personal data without using additional information;



personal data information system - a set of personal data contained in databases and information technologies and technical means ensuring their processing;

cross-border transfer of personal data - transfer of personal data to the territory of a foreign country to a foreign government authority, a foreign individual or a foreign legal entity.

1.5. Basic rights and obligations of the Operator.

1.5.1 The Operator has the right to:

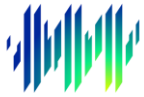
- 1) independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations stipulated by the Personal Data Law and regulatory legal acts adopted in accordance therewith, unless otherwise provided by the Personal Data Law or other federal laws;
- 2) to entrust the processing of personal data to another person with the consent of the personal data subject, unless otherwise provided for by the federal law, on the basis of a contract concluded with this person. The person performing personal data processing on behalf of the Operator shall be obliged to comply with the principles and rules of personal data processing stipulated by the Personal Data Law;
- 3) in case the personal data subject revokes his/her consent to personal data processing, the Operator shall have the right to continue personal data processing without the consent of the personal data subject if there are grounds specified in the Personal Data Law.

1.5.2 The Operator shall:

- 1) organize the processing of personal data in accordance with the requirements of the Personal Data Law;
- 2) respond to appeals and requests of personal data subjects and their legal representatives in accordance with the requirements of the Law on personal data;
- 3) to inform the authorized body for the protection of the rights of personal data subjects (the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor)) at the request of this body of the necessary information within 10 days from the date of receipt of such a request.

1.6. Basic rights of the personal data subject. The subject of personal data has the right to:

- 1) to receive information regarding the processing of his/her personal data, except in cases provided for by federal laws. Information shall be provided to the subject of personal data by the Operator in an accessible form and shall not contain personal data relating to other subjects of personal data, except in cases where there are legal grounds for disclosure of such personal data. The list of information and the procedure for obtaining it is established by the Law on Personal Data;
- 2) to demand from the operator to clarify his personal data, block or destroy them
- 3) blocking or destruction 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 for by law to protect their rights;
- 4) impose a condition of prior consent when processing personal data for the purpose of

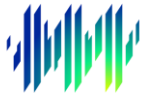


marketing of goods, works and services;

- 5) appeal to Roskomnadzor or in court against unlawful acts or omissions of the Operator in processing his/her personal data.
- 1.7. Control over compliance with the requirements of this Policy shall be exercised by the authorized person responsible for the organization of personal data processing at the Operator.
- 1.8. Responsibility for violation of the requirements of the legislation of the Russian Federation and regulations of ASSOCIATION “ALLIANCE IN RESEARCH INTELLIGENCE” in the field of processing and protection of personal data shall be determined in accordance with the legislation of the Russian Federation.

2. Purposes of personal data collection

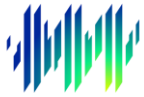
- 2.1. The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data incompatible with the purposes of personal data collection is not allowed.
- 2.2. Only personal data that meet the purposes of their processing shall be processed.
- 2.3. The ASSOCIATION, being a personal data operator, shall process personal data of its employees and other subjects of personal data who are not in labor relations with the ASSOCIATION.
- 2.4. The Operator shall process personal data for the following purposes:
 - ensuring compliance with the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation, local regulatory acts of the Company;
 - fulfillment of functions, powers and duties assigned by the legislation of the Russian Federation to the ASSOCIATION, including the provision of personal data to governmental authorities, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Compulsory Medical Insurance Fund, as well as other governmental authorities;
 - regulating labor relations with the ASSOCIATION's employees (attracting and selecting candidates for employment, assisting in employment, training and promotion, ensuring personal safety, controlling the quantity and quality of work performed, ensuring the safety of property);
 - providing the ASSOCIATION's employees and their family members with additional guarantees and compensations, including non-state pension provision, voluntary medical insurance, medical care and other types of social security;
 - protection of life, health or other vital interests of personal data subjects;
 - preparation, conclusion, execution and termination of contracts with contractors;
 - ensuring access and intra-object regimes at the ASSOCIATION's facilities;



- formation of reference materials for internal information support of the ASSOCIATION's activities;
- realization of social and charitable projects;
- ensuring the functioning of the ASSOCIATION's Internet resources, including those providing services and monitoring user behavior;
- execution of judicial acts, acts of other bodies or officials subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;
- exercising the rights and legitimate interests of the ASSOCIATION within the framework of activities provided by the Charter and other local normative acts of the ASSOCIATION, or third parties, or achieving socially important goals;
- implementation of the Code of Ethics in the field of artificial intelligence of the ASSOCIATION;
- organizing and conducting contests;
- organizing and conducting training events;
- for other lawful purposes.

3. Legal basis of personal data processing

- 3.1. The legal basis for processing personal data is a set of regulatory legal acts, pursuant to which and in accordance with which the Operator processes personal data, including:
- Constitution of the Russian Federation;
 - Civil Code of the Russian Federation;
 - Labor Code of the Russian Federation;
 - Tax Code of the Russian Federation;
 - Federal Law dated 12.01.1996 N 7-FZ “On Non-Profit Organizations”.
 - Federal Law dated 06.12.2011 N 402-FZ “On Accounting”;
 - Federal Law dated 15.12.2001 N 167-FZ “On Compulsory Pension Insurance in the Russian Federation”;
 - Other normative legal acts regulating relations related to the Operator's activities.
- 3.2. The legal basis for personal data processing is also:
- charter of the ASSOCIATION “ALLIANCE IN THE RESEARCH INTELLIGENCE SPHERE”;
 - contracts concluded between the Operator and personal data subjects;
 - consent of personal data subjects to the processing of their personal data.



4. Scope and categories of processed personal data, categories of personal data subjects

4.1. The content and scope of the processed personal data shall correspond to the stated processing purposes provided for in section 2 of this Policy. Processed personal data shall not be redundant in relation to the stated purposes of their processing.

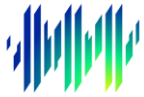
4.2. The Operator may process personal data of the following categories of personal data subjects.

4.2.1 Candidates for employment with the Operator:

- surname, first name, patronymic;
- gender;
- citizenship;
- date and place of birth
- contact information;
- information on education, work experience, qualifications;
- other personal data provided by candidates in their CVs and cover letters.

4.2.2 Employees and former employees of the Operator:

- surname, first name, patronymic;
- gender;
- citizenship;
- date and place of birth;
- image (photograph);
- passport data;
- address of registration at the place of residence;
- address of actual residence;
- contact information;
- individual taxpayer number;
- insurance number of individual personal account (SNILS);
- information on education, qualifications, professional training and advanced training;
- marital status, presence of children, family ties;
- information on labor activity, including incentives, awards and (or) disciplinary penalties;
- data on marriage registration;
- information on military registration;
- information on disability;
- information on alimony withholding;
- information on income from previous employment;
- other personal data provided by the employees in accordance with the requirements of the



labor legislation.

4.2.3 Family members of the Operator's employees:

- surname, first name, patronymic;
- degree of kinship;
- year of birth;
- other personal data provided by employees in accordance with the requirements of labor legislation.

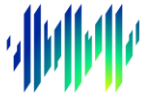
4.2.4 Operator's Customers and counterparties of the Operator (individuals: participants of competitions and other persons assisting the Operator in realization of educational activities in the field of artificial intelligence):

- surname, first name, patronymic;
- date and place of birth;
- passport data;
- address of registration at the place of residence
- contact information;
- academic degree or other regalia;
- place of work or scientific activity;
- work experience;
- position held;
- individual taxpayer number;
- account number;
- information on education;
- insurance number of individual personal account (SNILS);
- other personal data provided by clients and counterparties (individuals) necessary for conclusion and execution of contracts.

4.2.5 Representatives (employees) of the Operator's clients and counterparties (legal entities):

- surname, first name, patronymic;
- passport data;
- contact details;
- position held;
- other personal data provided by representatives (employees) of clients and counterparties necessary for conclusion and fulfillment of contracts.

4.3. The Operator collects and processes anonymized data about the Operator's website users (cookies) using Internet statistics services (Yandex.Metrica). The basis for data processing in this case will be the consent to the processing of personal data provided by the website user by clicking the "OK" button on the banner warning the user about the collection of cookie



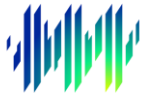
files or continuing to use the website.

- 4.3.1 The user has the right to refuse to save and use the cookies or delete the already saved cookies through the browser settings.
- 4.3.2 In case of refusal to process cookie files, the Operator's website will use only those cookie files that are necessary for the correct functioning of the website.
- 4.4. The Operator does not process special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, state of health, intimate life, except for cases stipulated by the legislation of the Russian Federation.

5. Procedure and conditions of personal data processing

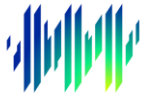
- 5.1. Processing of personal data shall be carried out by the Operator in accordance with the requirements of the legislation of the Russian Federation.
- 5.2. Processing of personal data shall be carried out with the consent of personal data subjects to the processing of their personal data, as well as without it in cases provided for by the legislation of the Russian Federation.
- 5.3. The Operator performs both automated and non-automated processing of personal data.
- 5.4. The Operator's employees whose job description includes personal data processing are allowed to process personal data.
- 5.5. Processing of personal data is carried out by:
 - receiving personal data orally and in writing directly from personal data subjects;
 - entering personal data into the Operator's journals, registers and information systems;
 - using other methods of personal data processing.
- 5.6. Disclosure to third parties and dissemination of personal data without the consent of the subject of personal data is not allowed, unless otherwise provided for by federal law. Consent to the processing of personal data authorized by the subject of personal data for dissemination shall be executed separately from other consents of the subject of personal data to the processing of his/her personal data.
- 5.7. The Operator may transfer personal data to the following third parties to achieve the purposes specified in clause 2.4:
 - ASSOCIATION member companies listed on the Operator's official website at <https://ai.ru/>;
 - Yandex.Metrika web analytics service;
 - to inquiry and investigation authorities, the Federal Tax Service, the Pension and Social Insurance Fund of the Russian Federation and other authorized executive authorities and organizations;
 - to other third parties, the transfer of personal data to whom is necessary to achieve the goals specified in clause 2.4.

The specific list of third parties and the purposes of transferring the subject's personal data



shall be specified in the subject's consent to the processing of personal data.

- 5.8. The Operator shall take necessary legal, organizational and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, dissemination and other unauthorized actions, including:
- determines threats to the security of personal data during its processing;
 - adopts local normative acts and other documents regulating relations in the field of personal data processing and protection;
 - appoints persons responsible for ensuring personal data security in the structural subdivisions and information systems of the Operator;
 - creates necessary conditions for working with personal data;
 - organizes accounting of documents containing personal data;
- organizes work with information systems in which personal data are processed;
- store personal data in conditions that ensure their safety and prevent unauthorized access to them;
 - organizes training of the Operator's employees processing personal data.
- 5.9. The Operator shall store personal data in a form that allows to identify the subject of personal data for no longer than required by the purposes of personal data processing, unless the period of personal data storage is established by federal law or contract.
- 5.10. When collecting personal data, including via the information and telecommunications network Internet, the Operator shall ensure recording, systematization, accumulation, storage, clarification (update, change), extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except for cases specified in the Law on Personal Data.
6. Actualization, correction, deletion and destruction of personal data, responses to requests of subjects for access to personal data
- 6.1. Confirmation of the fact of personal data processing by the Operator, legal grounds and purposes of personal data processing, as well as other information specified in part 7 of Article 14 of the Law on Personal Data shall be provided by the Operator to the personal data subject or his/her representative upon application or upon receipt of a request from the personal data subject or his/her representative.
- The information provided shall not include personal data related to other personal data subjects, except for cases when there are legal grounds for disclosure of such personal data.
- The request shall contain:
- number of the main identity document of the personal data subject or his/her representative, information about the date of issue of the said document and the issuing authority;
 - information confirming the personal data subject's participation in relations with the



Operator (contract number, date of contract conclusion, conventional word designation and (or) other information), or information otherwise confirming the fact of personal data processing by the Operator;

- signature of the personal data subject or his/her representative.

The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

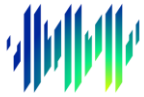
If the application (request) of the personal data subject does not reflect all necessary information in accordance with the requirements of the Law on personal data or the subject does not have the right of access to the requested information, a reasoned refusal shall be sent to him/her.

The right of the personal data subject to access his/her personal data may be restricted in accordance with part 8 of Article 14 of the Law on personal data, including if the access of the personal data subject to his/her personal data violates the rights and legitimate interests of third parties.

In case of detection of inaccurate personal data upon application of the personal data subject or his/her representative or upon their request or upon request of Roskomnadzor, the Operator blocks personal data related to this personal data subject from the moment of such application or receipt of the said request for the period of verification, if the blocking of personal data does not violate the rights and legitimate interests of the personal data subject or third parties. If the fact of inaccuracy of personal data is confirmed, the Operator, based on the information submitted by the personal data subject or his/her representative or Roskomnadzor, or other necessary documents, shall clarify the personal data within seven working days from the date of submission of such information and lift the blocking of personal data.

- 6.2. In case of detection of unlawful processing of personal data upon application (request) of the personal data subject or his/her representative or Roskomnadzor, the Operator shall block the unlawfully processed personal data related to this personal data subject from the moment of such application or request.
- 6.3. When the purposes of personal data processing are achieved, as well as in case the subject of personal data withdraws his/her consent to their processing, the personal data shall be destroyed, unless:
 - otherwise is not provided for by the contract to which the personal data subject is a party, beneficiary or guarantor;
 - the operator may not carry out processing without the consent of the subject of personal data on the grounds provided for by the Personal Data Law or other federal laws;
 - unless otherwise provided for by another agreement between the Operator and the subject of personal data.

7. Final Provisions



- 7.1. Other rights and obligations of the Operator in connection with the processing of Personal Data not provided for by this Policy shall be determined by the legislation of the Russian Federation in the field of personal data.
- 7.2. This Policy may be amended. The Company shall have the right to make changes at its own discretion, including, but not limited to, in cases where the relevant changes are related to changes in the applicable laws of the Russian Federation.
- 7.3. Personal data subjects whose personal data are processed by the Operator may exercise their rights and legitimate interests by sending a corresponding written request to the following postal address: 125047, Moscow, vn.ter.g.municipal distric Tverskoy, ul. Butyrsky val,d. 10or in electronic form at: info@a-ai.ru.