

PERSONAL DATA PROCESSING AND PROTECTION POLICY OF JSC "DASHBOARD SYSTEMS"

1. GENERAL PROVISIONS

1.1. This Personal Data Processing Policy (hereinafter referred to as the "Policy") has been drawn up in accordance with the requirements of Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data" (hereinafter referred to as the "Personal Data Law") and determines the procedure for personal data processing and measures to ensure personal data security taken by JSC "Dashboard Systems" (hereinafter referred to as the "Operator").

1.2. Operator sets as its most important goal and condition for the execution of its activities the respect for human and civil rights and freedoms during the processing of personal data, including the protection of the rights to privacy, personal, and family secrets.

1.3. This Policy applies both to Website and to Operator's Services (regardless of the platform) and extends its effect to any individuals (Users) whose personal data was provided to Operator in connection with:

- the use of the Services, and/or
- the receipt or provision of services through Services, and/or
- the conclusion of civil law and labor contracts, and/or
- other purposes for the achievement of which personal data processing is required.

1.4. The use of Services and the provision of personal data through input forms confirms User's consent to this Policy and the conditions of personal data processing specified herein. The provision of consent within the framework of this Policy may be carried out by User in any form allowing to confirm the fact of its receipt, including:

- by performing conclusive actions (acceptance by conduct) in the Services (clicking confirmation buttons, ticking checkboxes, continuing to use the Services or the Website);
- by signing a consent on paper or in electronic form (including the use of electronic document management (EDM) or a simple electronic signature when concluding contracts);
- by sending consent or documents containing personal data to the official email addresses of Operator.

1.5. In case of disagreement with the conditions of personal data processing, User must refrain from using Services and providing data.

2. BASIC DEFINITIONS USED IN THE POLICY

2.1. Automated processing of personal data — processing of personal data by means of computer technology.

2.2. Blocking of personal data — temporary cessation of personal data processing (unless the processing is necessary to clarify personal data).

2.3. Website — a combination of graphic and information materials, as well as computer programs and databases ensuring their availability on the Internet at the network address <https://boardmaps.ru>.

2.4. Personal data information system — a combination of personal data contained in databases, and information technologies and technical means ensuring their processing.

2.5. Depersonalization of personal data — actions making it impossible to determine, without the use of additional information, whether personal data belongs to a specific User or any other personal data subject.

2.6. Processing of personal data — any action (operation) or a set of actions (operations) performed with personal data, with or without the use of automation tools, including the collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion, and destruction of personal data.

2.7. Operator — a state body, municipal body, legal entity, or individual independently or jointly with other entities organizing and/or performing personal data processing, as well as determining the purposes of personal data processing, the scope of personal data to be processed, and the actions (operations) performed with personal data.

2.8. Personal data — any information relating directly or indirectly to an identified or identifiable personal data subject.

2.9. Personal data permitted for distribution — personal data, access to which by an unlimited number of persons is provided by a personal data subject by giving consent to the processing of personal data permitted by the personal data subject for distribution in the manner prescribed by the Personal Data Law (hereinafter referred to as "personal data permitted for distribution").

2.10. User — a personal data subject who has provided their personal data to Operator in connection with: (1) the use of Services, and/or (2) receiving or providing services when using Services, and/or (3) concluding civil law and labor contracts, and/or (4) other purposes for which the processing of personal data is necessary.

2.11. Provision of personal data — actions aimed at disclosing personal data to a specific person or a specific circle of persons.

2.12. Distribution of personal data — any actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or at familiarizing an unlimited circle of persons with personal data, including the publication of personal data in the media, placement in information and telecommunication networks, or providing access to personal data in any other way.

2.13. Service/Services — Operator's Website, as well as software (including cloud services, web versions, mobile applications for any platforms and operating systems), the exclusive rights to which belong to Operator, or the right to use and distribute which is granted to Operator by third parties.

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

2.15. Destruction of personal data — any actions as a result of which personal data is destroyed irrevocably with the impossibility of further restoring the content of personal data in the personal data information system and/or as a result of which the physical media of personal data are destroyed.

3. MAIN RIGHTS AND OBLIGATIONS OF THE OPERATOR

3.1. Operator has the right to:

- receive reliable information and/or documents containing personal data from a personal data subject;

- process personal data without the consent of a personal data subject if there are grounds provided for by legislation (including for the performance of a contract to which such subject is a party, or for the performance of functions assigned to Operator by law);
- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations provided for by Personal Data Law and normative legal acts adopted in accordance with it, unless otherwise provided by Personal Data Law or other federal laws.

3.2. Operator is obliged to:

- provide a personal data subject, at their request, with information concerning the processing of their personal data;
- publish or otherwise provide unlimited access to this Policy regarding the processing of personal data;
- take legal, organizational, and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution, as well as from other unlawful actions in relation to personal data;
- notify the authorized body of identified personal data incidents (leaks) in the manner and within the time limits established by legislation;
- cease the transfer (distribution, provision, access), cease the processing, and destroy personal data in the manner and cases provided for by the Personal Data Law.

4. MAIN RIGHTS AND OBLIGATIONS OF PERSONAL DATA SUBJECTS

4.1. Personal data subjects have the right to:

- receive information concerning the processing of their personal data, except in cases provided for by federal laws. The list of information and the procedure for obtaining it are established by Personal Data Law;
- require Operator to clarify their personal data, block or destroy it if such personal data is incomplete, outdated, inaccurate, unlawfully obtained, or not necessary for the stated purpose of processing, as well as to take measures provided for by law to protect their rights;
- impose a condition of prior consent when processing personal data for the purpose of marketing goods, works, and services;
- withdraw consent to the processing of personal data, as well as send a demand to terminate the processing of personal data.

4.2. Personal data subjects are obliged to:

- provide Operator with reliable data about themselves;
- notify Operator of any clarification (updating, modification) of their personal data.

4.3. Persons who have provided Operator with false information about themselves, or information about another personal data subject without the latter's consent, shall be liable in accordance with the legislation.

5. PRINCIPLES OF PERSONAL DATA PROCESSING

- 5.1. Processing of personal data is carried out on a lawful and fair basis.
- 5.2. Processing of personal data is limited to the achievement of specific, predetermined, and legitimate purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not permitted.
- 5.3. The combination of databases containing personal data, the processing of which is carried out for purposes incompatible with each other, is not permitted.
- 5.4. Only personal data that meets the purposes of its processing is subject to processing.
- 5.5. The content and volume of the processed personal data shall correspond to the stated purposes of processing. Excessiveness of the processed personal data in relation to the stated purposes of their processing is not permitted.
- 5.6. When processing personal data, the accuracy of personal data, its sufficiency, and, where necessary, its relevance to the purposes of processing personal data shall be ensured. Operator takes the necessary measures and/or ensures their adoption regarding the deletion or clarification of incomplete or inaccurate data.
- 5.7. Personal data shall be stored no longer than required by the purposes of personal data processing, unless the storage period of personal data is established by federal law or by a contract to which a personal data subject is a party, beneficiary, or guarantor. The processed personal data shall be destroyed or depersonalized upon achievement of the processing purposes or in the event of the loss of the necessity to achieve these purposes, unless otherwise provided for by federal law.

6. PURPOSES OF PROCESSING AND CATEGORIES OF PERSONAL DATA

- 6.1. Operator may process various categories of Users' personal data depending on the purposes of processing:

Purpose No. 1. Operation, maintenance, and development of Services. Maintenance and improvement of Services, providing access to Services, information, and/or materials placed on Website.

Categories of personal data:

- **Technical device and OS data:** IP address, type and version of operating system, device model and identifiers, mobile network information.
- **Software and browser parameters:** type, version, and settings of browser, language settings, time zone, hardware settings, and system error reports.
- **Geolocation data:** information about current location and geolocation.
- **User activity information:** login and logout time, visited pages, used features, access speed, full clickstream URLs (including date and time), page response times, and download errors.
- **Interface interaction:** information on device events, scrolling, clicks, mouse-overs, interaction with dynamic page elements, and methods used to browse away from pages.
- **System identifiers:** unique IDs assigned to personal data subject to ensure the functionality of Services.

Purpose No. 2. Registration, authorization, and interaction within Services. Creation of accounts, identification of Users, enabling collaboration, and communication with technical support.

Categories of personal data:

- **User profile data:** last name, first name, patronymic (if any), email address, contact phone number, photograph (profile avatar), job title.
- **Credentials:** login (User identifier), hashed password, two-factor authentication (MFA) details.
- **Professional affiliation:** name of organization (employer), system role (administrator, participant, secretary, etc.).
- **Interaction details within Services:** information that User independently uploads to profile or provides during the use of Services (messages in support chats, notification settings, etc.).

Purpose No. 3. Interaction with counter-parties. Concluding, executing, and terminating civil law contracts, conducting mutual settlements, and handling claims.

Categories of personal data:

- **Identification data:** last name, first name, patronymic (if any), date and place of birth, gender, citizenship.
- **Information from identity documents:** document series and number, date of issue, name of issuing authority, department code, expiration date (if any), registered residential address.
- **Contact details:** actual residential address (mailing address), phone number, email address.
- **Tax and financial details:** taxpayer identification number (TIN / INN) or its foreign equivalent, SNILS (for individuals), bank details (account number, BIC, bank name).
- **Information on authority and professional activity:** name of employer (for representatives of legal entities), job title, information on authority (power of attorney data or other document details).
- **Information for electronic interaction:** data on electronic signature certificates (when using EDM).

Purpose No. 4. Communication and marketing. Processing incoming inquiries, conducting product demonstrations, informing about new features, and sending newsletters/advertising materials.

Categories of personal data:

- **Contact details for communication:** last name, first name, patronymic, email address, phone number, links to messenger profiles (if the request was received through them).
- **Professional information:** name of organization (employer), job title, company's field of activity.
- **Inquiry details:** history of inquiries, topics of interested products, records of negotiations, and message content (in case of processing incoming requests).
- **Marketing preferences:** information on newsletter subscriptions, information on attending webinars, events, and participation in surveys.
- **Technical markers (for email newsletters):** information on opening emails, clicks on links in information materials (to evaluate communication effectiveness).

Purpose No. 5. Interaction with job applicants. Evaluating qualifications, conducting interviews, and making hiring decisions.

Categories of personal data:

- **Identification data:** last name, first name, patronymic, date of birth.
- **Contact details:** phone number, email address, place of residence (city).
- **Professional information:** information on education, work experience, qualifications, academic degrees, and titles.
- **Additional information from resume:** any other data that applicant at their discretion specified in resume or cover letter (including links to portfolios, social networks, etc.).

Purpose No. 6. HR accounting, conclusion, and execution of labor contracts. Fulfilling the requirements of labor, tax, and pension legislation, ensuring safety, and protecting the health of employees.

Categories of personal data:

- **Identification data:** full name, passport details (series, number, by whom and when issued), gender, citizenship, date and place of birth, photograph (for badges and personal file).
- **Contact details:** registered address, actual residential address, phone number, email address.
- **Tax and banking details:** TIN / INN, SNILS, bank details for payroll.
- **Information on education and skills:** details of diplomas, certificates, specialty, foreign language proficiency, driver's license details (if applicable), data contained in employment record book.
- **Marital status and family composition:** information on marital status, presence of children, right to receive statutory benefits.
- **Military registration:** all data necessary for military registration in accordance with legislative requirements.
- **Health status information:** information on disability and presence of medical conditions affecting the performance of labor duties or requiring special working conditions.

Purpose No. 7. Financial and economic activities and accounting. Maintaining accounting and tax records, conducting audits, paying invoices, and complying with the requirements of financial legislation.

Categories of personal data:

- **Identification data:** last name, first name, patronymic, TIN / INN, SNILS (for settlements with individuals).
- **Financial information:** bank details, information on payments made, remuneration amounts, data of primary accounting documents (acts, invoices), and other information necessary for settlements.
- **Marital status and family composition:** data on the presence of children and other dependents, the right to receive tax deductions and social benefits.
- **Information on the right to tax benefits and deductions:** documents confirming the right to reduce the tax base (including information on disability, combat veteran status, and other legal grounds).

Purpose No. 8. Ensuring security and access control (ACS). Ensuring office security, protecting property, and monitoring attendance (including when interacting with the business center management).

Categories of personal data:

- **Visitor data:** last name, first name, patronymic, identity document details.
- **Visit information:** date and time of entry/exit.
- **Video image:** information received from video surveillance cameras installed in Operator's office premises.

Purpose No. 9. Compliance with legislative requirements and protection of legitimate interests

Fulfilling mandatory legal requirements, responding to requests from state authorities, and protecting company interests in courts.

Categories of personal data:

- **Data categories:** any categories of personal data specified in this section, to the extent necessary to respond to a regulator's request or to handle claims and litigation.

6.2. In cases expressly established by legislation, Operator has the right to process other categories of personal data not provided for in clause 6.1 of this Policy, if it is necessary for the performance of statutory duties assigned to Operator.

7. GROUNDS AND CONDITIONS OF PERSONAL DATA PROCESSING

7.1. Operator processes a subject's personal data on lawful grounds, in strict compliance with the legislation of the Russian Federation.

7.2. The grounds for personal data processing are:

- the consent of the data subject to the processing of their personal data (Clause 1, Part 1, Article 6 of Federal Law No. 152);
- the necessity of processing for the performance of functions, powers, and duties assigned to Operator by legislation (Clause 2, Part 1, Article 6 of Federal Law No. 152), including the requirements of tax and accounting legislation, anti-corruption legislation, etc.;
- the necessity of processing for the conclusion, performance, and termination of contracts to which a personal data subject is a party, beneficiary, or guarantor, including, but not limited to, license agreements, user agreements of Services, and civil law contracts with counterparties, etc. (Clause 5, Part 1, Article 6 of Federal Law No. 152);
- the necessity of processing for the exercise of the rights and legitimate interests of Operator or third parties, or for the achievement of socially significant goals, provided that the rights and freedoms of the personal data subject are not violated (Clause 15, Part 1, Article 6 of Federal Law No. 152).

7.3. Operator also processes personal data, access to which by an unlimited number of persons has been provided by personal data subject or at their request (hereinafter referred to as "publicly available personal data").

7.4. Operator processes personal data subject to publication or mandatory disclosure in accordance with federal law.

8. PROCEDURE FOR PERSONAL DATA PROCESSING

- 8.1. The security of personal data processed by Operator is ensured through the implementation of legal, organizational, and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.
- 8.2. Operator ensures the safety of personal data and takes all possible measures to exclude access to personal data by unauthorized persons.
- 8.3. User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the compliance with current legislation or if personal data subject has given consent to Operator to transfer data to a third party for the performance of obligations under a civil law contract.
- 8.4. In case of identification of inaccuracies in personal data, User may update it independently by sending a notification to Operator's email address info@boardmaps.ru marked "Personal data update".
- 8.5. The period for personal data processing is determined by the achievement of the purposes for which the personal data was collected, unless another period is provided for by contract or current legislation. User may at any time withdraw their consent to the processing of personal data by sending a notification to Operator via email to Operator's email address info@boardmaps.ru marked "Withdrawal of consent to personal data processing".
- 8.6. All information collected by third-party services, including payment systems, means of communication, and other service providers, is stored and processed by such persons (Operators) in accordance with their User Agreement and Privacy Policy. Personal data subject and/or User is obliged to independently and timely familiarize themselves with the specified documents. Operator is not liable for the actions of third parties, including the service providers specified in this clause.
- 8.7. Prohibitions established by personal data subject on the transfer (except for providing access), as well as on the processing or conditions of processing (except for obtaining access) of personal data permitted for distribution, shall not apply in cases of personal data processing in state, public, and other public interests defined by the legislation of the Russian Federation.
- 8.8. Operator ensures the confidentiality of personal data when processing personal data.
- 8.9. Operator stores personal data in a form that allows the identification of personal data subject for no longer than required by the purposes of personal data processing, unless the storage period of personal data is established by federal law or by a contract to which personal data subject is a party, beneficiary, or guarantor.
- 8.10. A condition for terminating personal data processing may be the achievement of the purposes of personal data processing, the expiration of personal data subject's consent, the withdrawal of consent by personal data subject, a demand to terminate personal data processing, or the detection of unlawful personal data processing.

9. PROCESSING OF ELECTRONIC USER DATA

- 9.1. Operator, for the purposes of personal data processing established by Policy, may collect electronic user data on Website automatically, without the need for user participation or any user action to submit data.
- 9.2. The accuracy of electronic data collected in this manner is not verified by Operator; information is processed on an "as is" basis in the form received from the client device.
- 9.3. Visitors and users of Operator's Website may be shown pop-up notifications regarding the collection and processing of data (log/cookie files) containing a link to Policy and buttons to accept the processing conditions or close the pop-up notification.

9.4. Such notifications mean that when visiting and using Operator's websites, information resources, and web applications, information (for example, log/cookie file data) may be saved to the browser on User's device, allowing to further identify User or device, remember the work session, or save certain user settings and preferences specific to these particular websites. Once saved to the browser and until the expiration of their validity period or deletion from the device, such information will be sent along with each subsequent request to the website on whose behalf it was saved, for processing on Operator's side.

9.5. The processing of log/cookie file data is necessary for Operator for the correct operation of Website, in particular, for functions related to the access of registered Users to Operator's software products, services, works, and resources; the personalization of Users; improving the efficiency and usability of Website, as well as for other purposes provided for by Policy.

9.6. In addition to the processing of log/cookie file data by Operator's Website, log/cookie files belonging to third-party websites may be installed on Users' devices, for example, when third-party components and software are used on Operator's Website. The processing of such log/cookie files is governed by the policies of the respective websites to which they belong and may change without notice to Users of Operator's Website. Such cases may include the placement of the following on websites:

- counters of visits, analytical, and statistical services, such as Yandex.Metrica or Google Analytics, to collect traffic statistics for publicly accessible website pages;
- widgets of auxiliary services for collecting feedback, organizing chats, and other types of communication with Users;
- contextual advertising systems, banner networks, and other marketing networks;
- authorization buttons on websites using social network accounts;
- other third-party components used by Operator on Website.

9.7. The acceptance of log/cookie file processing conditions by User or closing the pop-up notification in accordance with Policy is deemed as consent to the processing of such log/cookie file data on Operator's Website.

9.8. If User does not agree to the processing of log/cookie files, they must assume the risk that in such case the features and capabilities of Website may not be fully available, and then follow one of the options below:

- independently configure their browser in accordance with its documentation or help files in such a way that it permanently disallows accepting and sending log/cookie file data for Operator's Website or a third-party component's website;
- switch to a special "incognito" mode of the browser to use log/cookie files only until the browser window is closed or until switching back to normal mode;
- leave Website to avoid further processing of log/cookie files.

9.9. User may independently manage saved data through the tools for working with log/cookie file data built into browsers, including deleting or viewing information about log/cookie files installed by websites, including:

- website addresses and paths to which log/cookie files will be sent;
- names and values of parameters stored in log/cookie files;
- validity periods of log/cookie files.

10. METHODS OF PERSONAL DATA PROCESSING

10.1. Operator carries out the collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data.

10.2. Operator carries out automated processing of personal data with or without the receipt and/or transfer of the received information via information and telecommunication networks.

11. CROSS-BORDER TRANSFER OF PERSONAL DATA

11.1. Operator is obliged to notify the authorized body for the protection of the rights of personal data subjects of its intention to carry out cross-border transfer of personal data before commencing such cross-border transfer activities (such notification is submitted separately from the notification of intention to process personal data).

11.2. Operator is obliged to obtain relevant information from the authorities of a foreign state, foreign individuals, or foreign legal entities to whom the cross-border transfer of personal data is planned prior to submitting the aforementioned notification.

12. CONFIDENTIALITY OF PERSONAL DATA

12.1. Operator and other persons who have gained access to personal data are obliged not to disclose personal data to third parties and not to distribute it without the consent of personal data subject, unless otherwise provided for by federal law.

13. FINAL PROVISIONS

13.1. User may obtain any clarifications on issues of interest regarding the processing of their personal data by contacting Operator via email at info@boardmaps.ru.

13.2. Any changes to the personal data processing policy by Operator will be reflected in this document. The Policy is effective indefinitely until replaced by a new version.

13.3. The current version of Policy is freely available on the Internet at <https://boardmaps.ru/privacy>.