

QUANTEK LLC Privacy Policy

1. General Provisions

1.1. This document defines the purposes and general principles of personal data processing, as well as the measures implemented to protect the personal data in QUANTEK LLC (hereinafter referred to as the Operator, the Company or QUANTEK LLC). The Policy is a publicly available document of the Operator and is intended for access by the public.

1.2. The Policy is developed and applied in accordance with Clause 2 Part 1 Article 18.1 of Federal Law No.152-FZ “On Personal Data” dated July 27, 2006.

1.3. The Policy uses the terms and definitions as stipulated by Federal Law No.152-FZ “On Personal Data” dated July 27, 2006.

1.4. The following abbreviations are used in the Policy:

PD – Personal Data;

IS – Information Security;

Policy – the current QUANTEK LLC Privacy Policy;

Full name – surname, first name, patronymic;

Federal Law “On Personal Data” – Federal Law No.152-FZ “On Personal Data” dated July 27, 2006;

ISPD – Information System of Personal Data;

Cookies – files with a small amount of data that may contain an anonymous unique identifier. Cookies are transmitted to the web browser from the Website and stored on the User’s device.

2. Operator’s Information

Name: QUANTEK Limited Liability Company

Registration Number (OGRN) 1147847440135, Taxpayer Identification Number (TIN) 7816601369

Physical address: 194044, Saint Petersburg, B. Sampsoniyevsky Av., 60 Building A, room 1–H.

3. Purposes of personal data processing:

The Provider processes personal data solely for the following purposes:

3.1. Fulfilling the requirements of applicable law;

3.2. Making decisions on signing employment contracts;

3.3. Maintaining personnel records, signing and fulfillment of obligations under employment contracts;

3.4. Arranging for individual (personalized) registration of employees in the compulsory pension insurance system;

3.5. Conclusion of contracts with clients and counterparties/potential clients and counterparties of the Company and fulfillment of obligations under them, as well as when potential clients and counterparties provide their personal data on the Company’s Internet site <https://qntk.ru/> (hereinafter referred to as the Company's Website, the Website) for further information about the services provided by the Company.

3.6. Filling out and submitting the required reporting forms to the executive authorities and other authorized organizations.

4. Legal Basis for Personal Data Processing

4.1. This document is designed on the basis of and in accordance with the following regulatory legal acts:

- The Constitution of the Russian Federation;

- The Civil Code of the Russian Federation;

- The Labor Code of the Russian Federation;

- The Internal Revenue Code of the Russian Federation;

- Federal Law No. 160-FZ “On Ratification of the Council of Europe Convention on the Protection of Individuals with Automated Processing of Personal Data” dated December 19, 2005;

- Federal Law No. 149-FZ “On Information, Information Technologies and Information Protection” dated July 27, 2006;

- Federal Law No. 126-FZ “On Communications” dated July 7, 2003;

- Federal Law No. 27-FZ “On Individual (Personalized) Accounting in the Mandatory Pension Insurance System” dated April 1, 1996;

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

- Federal Law No. 167-FZ “On Compulsory Pension Insurance in the Russian Federation” dated December 15, 2001;

- Contracts concluded between the Operator and the personal data subject, including labor and civil law contracts;
- Consent of the personal data subject (in cases provided for by the current legislation, written consent);
- Other regulatory legal acts governing the relations in the field of personal data security.

4.2. The Operator processes the User's personal data only in case the User fills it in and/or sends it personally through special forms on <https://qntk.ru/> website. By filling in the relevant forms and/or sending their personal data to the Provider, the User expresses their consent to this Policy.

4.3. The Operator processes anonymized data about the User if it is enabled in the User's browser settings (saving Cookies is enabled).

5. Main Categories of Personal Data Subjects

5.1. The Operator carries out both automated and non-automated processing of personal data of the following categories of personal data subjects:

5.1.1. Applicants (candidates) for vacant positions in QUANTEK LLC;

5.1.2. Current QUANTEK LLC employees with signed contracts;

5.1.3. Relatives of QUANTEK LLC employees;

5.1.4. Dismissed employees;

5.1.5. Clients/potential clients — Individuals who are customers of QUANTEK LLC (users of communication services, other services provided by QUANTEK LLC, buyers of QUANTEK LLC goods);

5.1.6. Counterparties/potential counterparties — Individuals who have signed civil law contracts with QUANTEK LLC, except for those specified in paragraph 5.1.5. of this Policy;

5.1.7. QUANTEK LLC visitors;

5.1.8. QUANTEK LLC Website visitors;

5.1.9. Representatives of the above-mentioned subjects authorized by the power of attorney;

5.1.10. Other personal data subjects (to ensure the implementation of the processing purposes specified in section 3 of the Policy).

6. Content and Volume of Personal Data Processing,

	Category of PD Subjects	PD Processing Purposes	PD Processed by the Operator	PD Processing Terms
6.1.	Applicants for vacant positions in QUANTEK LLC	Recruitment	<ul style="list-style-type: none"> - full name, - date and place of birth, - identity document details, - citizenship, - address of the place of registration, - address of the place of residence, - contact phone number, - email address, - educational degree information, - previous employment, work experience information, - other data, optionally specified in the questionnaire. 	<p>PD Processing Method – Mixed and Non–Automated. Time required to achieve the processing objectives.</p> <p>In case of job offer refusal, documents containing the candidate’s PD are stored for 10 years in order to form a personnel reserve.</p> <p>In the case of an employment contract, the documents that contain the candidate's PD are stored during the term of the employment contract.</p>
6.2.	QUANTEK LLC employees	<ul style="list-style-type: none"> - ensuring compliance with the applicable legislation; - managing the quantity and quality of work performed; - ensuring the personal safety of workers; - ensuring the safety of assets; 	<ul style="list-style-type: none"> - full name, - date and place of birth, - identity document details, - citizenship, - address of the place of registration, - address of the place of residence, - contact phone number, - email address, - educational degree information, - previous employment, work experience information, - marital status and composition of the family, 	<p>PD Processing Method – Automated and Mixed.</p> <p>For the duration of the employment contract and 5 years from the date of the employee’s dismissal, as required by current law, until the goals of processing are achieved or the consent to process personal data is revoked</p>

		- ensuring access control;	- photographic image, - information on social benefits, - state pension insurance data, - TIN, - individual pension insurance account number, - compulsory health insurance data, - information on military registration, - general information on professional fitness for health, necessary to fulfill the employment contract and legal requirements, - information on wages and other payments and deductions, received and made by in the course of employment, - bank account details, - information on permits, admissions, additional training, etc., required to perform professional activities, - information on incentives and cases of disciplinary liability.	
6.3.	Relatives of QUANTEK LLC employees	Ensuring compliance with the applicable legislation	- full name, - date of birth.	PD Processing Method – Mixed and Non–Automated For the duration of the employment contract and 5 years from the date of the employee’s dismissal, as required by current law, until the goals of processing are achieved or the consent to process personal data is revoked
6.4.	Dismissed employees	Ensure compliance with legal requirements	- full name, - date and place of birth, - identity document details, - citizenship, - address of the place of registration, - address of the place of residence, - contact phone number, - email address, - educational degree information, - previous employment, work experience information, - marital status and composition of the family, - photographic image, - information on social benefits, - state pension insurance data, - TIN, - Insurance Number of Individual Ledger Account, - compulsory health insurance data, - information on military registration, - general information on professional fitness for health, necessary to fulfill the employment contract and legal requirements, - information on wages and other payments and deductions, received and made by in the course of employment, - bank account details,	PD Processing Method – Mixed. Original copies of the documents provided by the employee to the employer (certificates, medical reports, etc.) are stored in the employee’s personnel file for 50 years after the termination of the employment contract by the employee. After termination of the employee’s employment contract, PD processing is carried out within 4 years in accordance with the requirements of subparagraph 5, paragraph 3, Article 24 of the Internal Revenue Code of the Russian Federation.

			<ul style="list-style-type: none"> - information on permits, admissions, additional training, etc., required to perform professional activities, - information on incentives and cases of disciplinary liability. 	
6.5.	Clients/potential clients — Individuals (service users, customers)	Negotiation; Conclusion, execution of contracts, additional agreements, confidentiality agreements Provision of services, sale of goods; Provision of information about the Company's services/goods.	<ul style="list-style-type: none"> - full name, - identity document details, - address of the place of residence, - details of the document certifying the power of the representative, - contact details: email, phone number, - Cookies. 	<p>PD Processing Method – Non-Automated and Mixed.</p> <p>Time required to achieve the processing objectives (when visiting the Website). Cookies are stored for 6 months since the date of the last visit to the Website.</p> <p>Contracts containing PD are subject to storage for 5 years after the expiration of the contract.</p>
6.6.	Counterparties/potential counterparties — Individuals who have signed civil law contracts with QUANTEK LLC, except for those specified in paragraph 5.1.5. of this Policy; Policies	Conclusion, execution and management of a civil contract, negotiation; Provision of information about the Company's services/goods.	<ul style="list-style-type: none"> - full name, - date, month, year of birth, - gender, - documents details of the educational degree, qualifications, vocational training, information on proficiency enhancement, - identity document details, - place of registration, - place of residence, - contact phone number, - email address, - TIN, - Insurance Number of Individual Ledger Account, - income details, - bank account details meant for payment under the contract. 	<p>PD Processing Method – Mixed.</p> <p>Time required to achieve the processing objectives (when negotiating, concluding contracts, additional agreements);</p> <p>Contracts containing PD are subject to storage for 5 years after the expiration of the contract.</p>
6.7.	QUANTEK LLC visitors;	Processing the visit request;	<ul style="list-style-type: none"> - full name, - date of the visit, - purpose of the visit, - occupation, - name of the company represented by the visitor, - contact phone number, - identity document details, 	<p>PD Processing Method – Mixed and Non–Automated</p> <p>The applications with visitors' PD are subject to storage for the duration of the period required to investigate IS incidents</p>
6.8.	QUANTEK LLC Website visitors;	browsing the Website, registration on the Website, provision of services; provision of information about the Company's services/goods; Cookies data, browser information.	<ul style="list-style-type: none"> - full name; - date of the visit, - purpose of the visit, - email address, - contact phone number, - Cookies, - - IP address of the visitor's device; - Cookies data; 	<p>PD Processing Method – Mixed and Non–Automated</p> <p>Time required to achieve the processing objectives (when visiting the Website). Cookies are stored for 6 months since the date of the last visit to the Website.</p> <p>Until the dissolution/termination date of the Terms of Services and/or other</p>

				agreement concluded between QUANTEK LLC and the individual, and/or until the withdrawal of the personal data subject's consent to the PD processing.
6.9.	Representatives of the aforementioned subjects authorized by a power of attorney	Based on the category of PD Subjects	- full name; - identity document details, - address of the place of residence, - details of the document certifying the power of the representative.	PD Processing Method – Mixed and Non–Automated In accordance with paragraph 4, Article 7 of the Federal Law № 115-FZ “On Counteracting the Legalization (Laundering) of Proceeds of Crime and Financing of Terrorism” dated August 7, 2001, the term of PD processing of the representatives authorized by a power of attorney shall be at least 5 years from the date of the agreement termination (in case the authorized representatives sign documents (reports, agreements, etc.)

7. Principles of Personal Data Processing by the Provider

The Operator processes personal data according to the following principles:

- legality of the purposes and methods of personal data processing, good faith and rightness in the Operator's activities;
- reliability of personal data, its sufficiency for processing purposes, the unacceptability of personal data processing in excess of the objectives specified for personal data collection;
- processing only such personal data which meets the processing purposes;
- compliance of the content and volume of processed personal data with the stated processing purposes; Processed personal data shall not be excessive in relation to the stated processing purposes.
- unacceptability of combining databases containing personal data, which are processed for mutually incompatible purposes;
- ensuring accuracy of personal data, its sufficiency, and, if necessary, relevance as against the purposes of personal data processing. The Operator takes the necessary measures or ensures that such measures are taken to remove or update incomplete or inaccurate data;
- storage of personal data in a form that allows to identify the personal data subject, no longer than required by the purpose of personal data processing.

7.2. The Operator can process biometric personal data subject to the requirements of applicable laws of the Russian Federation. Biometric personal data can only be processed by the Operator on the basis of the personal data subject's written consent.

7.3. The Operator can process personal data for the purpose of promoting goods, works, and services on the market through direct contact with a potential consumer only with the prior consent of the personal data subject and shall stop processing it upon their request.

7.4. Personal data can be obtained from someone who is not the personal data subject (from a third party or another source). In this case, prior to personal data processing, the subject shall be notified about the processing of their personal data, except in the following cases:

- the personal data subject has been notified of the processing of their personal data by the relevant Operator;
- the personal data has been received by the Operator on the basis of the federal legislation or in connection with the execution of a contract, to which the personal data subject is a party, or the beneficiary, or the guarantor;
- the personal data has been made publicly available by the personal data subject or has been obtained from a publicly accessible source.

8. Procedure and Conditions of Personal Data Processing

8.1. Personal data shall be processed with the consent of the personal data subjects, unless otherwise stipulated by the legislation of the Russian Federation.

8.2. Personal data can be processed with computer equipment (automated processing) or with direct participation of the person without computer equipment (non-automated processing).

8.3. Personal data can be processed only by those employees of QUANTEK LLC whose job duties include personal data processing.

The specified employees have the right to receive only the personal data necessary to perform their job duties.

8.4. Personal data is processed by:

- receiving information containing personal data in oral and written form directly from personal data subjects;
- receiving the originals of necessary documents from personal data subjects;
- obtaining duly certified copies of documents containing personal data or copying the original documents;
- receiving personal data upon sending inquiries to state authorities, state non-budgetary funds, other state authorities, local self-government authorities, commercial and non-commercial organizations and individuals in cases and in the manner specified by the legislation of the Russian Federation;
- obtaining personal data from publicly available sources;
- recording (registering) personal data in logs, books, registries, and other accounting forms;
- submitting personal data to QUANTEK LLC information systems;
- using other means and methods of recording personal data received as part of QUANTEK LLC activities.

8.5. Transfer of personal data to third parties (including cross-border transfer) is allowed with the written consent of personal data subjects, except when this is necessary to prevent threats to the life and health of personal data subjects and also in other cases established by the legislation of the Russian Federation.

8.6. When transferring personal data to third parties according to signed contracts, QUANTEK LLC ensures mandatory compliance with the requirements specified by the laws of the Russian Federation and the regulatory documents regarding personal data of QUANTEK LLC.

8.7. Personal data is transferred to authorized executive authorities and organizations (Ministry of Internal Affairs of the Russian Federation, Ministry of Foreign Affairs of the Russian Federation, Federal Tax Service, Pension Fund of the Russian Federation, Federal Compulsory Medical Insurance Fund of the Russian Federation, and others) in accordance with the requirements of the legislation of the Russian Federation.

8.8. Cross-border transfer of personal data to the territories of foreign states that are parties to the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data, as well as other foreign states that provide adequate protection of the rights of personal data subjects, shall be performed in accordance with Federal Law "On Personal Data" and may be prohibited or limited in order to protect the constitutional order of the Russian Federation, morality, health, rights and lawful interests of citizens, ensure national defense and homeland security. Cross-border transfer of personal data to a foreign country that is not a party to the specified Convention is carried out in accordance with legislative acts of the Russian Federation, provided that the legal norms and personal data security measures applied in this country comply with the provisions of the Convention.

8.9. QUANTEK LLC has the right to entrust personal data processing to another legal entity or individual entrepreneur upon the consent of personal data subjects on the basis of a concluded agreement. A legal entity or an individual entrepreneur that processes personal data on behalf of QUANTEK LLC must observe the principles and rules of personal data processing stipulated by the legislation of the Russian Federation regarding personal data.

8.10. If QUANTEK LLC transfers or entrusts personal data processing to another legal entity or individual entrepreneur under a signed contract, the obligation of the specified person to ensure the confidentiality and security of personal data during its transfer or processing should be an essential condition of such contract.

8.11. The periods for personal data storage by QUANTEK LLC are determined according to the legislation of the Russian Federation and the regulations on document management of QUANTEK LLC.

8.12. Consent to the personal data processing authorized by the personal data subject for its dissemination is issued separately from other consents of the personal data subject to their personal data processing.

8.13. Consent to the personal data processing authorized by the personal data subject for distribution can be provided to the Operator:

- directly;
- using the information system of the authorized body for the protection of the rights of personal data subjects.

8.14. Disclosure of the personal data to third parties and dissemination of it without the consent of the personal data subject are not allowed, unless otherwise stipulated by the federal law.

8.15. Transfer of personal data to the investigative authority, the Federal Tax Service, Pension Fund, Social Insurance Fund and other authorized executive authorities and organizations shall be performed in accordance with the requirements of the legislation of the Russian Federation.

8.16. When collecting personal data, including through the Internet information and telecommunications network, the Operator ensures the recording, systematization, accumulation, storage, clarification (updating, modification), extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except for the cases specified in the Federal Law "On Personal Data".

8.17. Procedure of personal data collection using Cookies

8.17.1. Depending on the functions and purposes performed, we use session and persistent Cookies.

Cookies are used to process the general habits of Users and the Website usage history, identify the problems and possible shortcomings in the operation of the Website, collect statistics on the flow of Users on the Website, the number of Users, time spent on the Website, etc. Cookies are also used to ensure the full functionality of the Website and its convenience for the User.

Cookies category	Usage example
Session	Improving our service.
Preferences	Allow the Website to save information that affects its appearance and available functions.
Security	Used for user authorization, prevention of fraudulent use of credentials and protection of user information from unauthorized access.

You cannot turn off the above cookies separately, but you can change your web browser settings to reject all cookies in case you do not want to accept them.

8.17.2. How Cookies are used

QUANTEK LLC uses Cookies to improve the functionality of the Website and provide the User with its products and services, namely:

- to maintain the security and user data verification when surfing from page to page, thus avoiding the need to re-enter data each time you go to a new page of the Website;
- to let your browser store the login and password, so that the User does not have to enter their data each time they visit the Website;
- to ensure the security and convenience of purchasing goods or services on the Website;
- to collect and compile anonymous aggregate data for statistical and evaluation purposes to let us understand how Users interact with the Website, as it helps us better present the information on the Site.

8.17.3. Cookies and analytics/advertisement

The QUANTEK LLC Website uses analytics and advertising Cookies.

Analytics Cookies allow us to collect information about Website usage, improve the quality of the Website content, determine what interests Website Users, how to improve the Website functionality and how to make the Website more user-friendly. Analytics Cookies show how Users interact with the Website (the data collected does not identify Users personally). We use statistical data and Cookies for their subsequent processing by the Yandex.Metrica data analytics system. Anonymous statistical data may be transmitted to contractors working on communication and other projects in accordance with a contractual agreement with QUANTEK LLC. Analytics Cookies are not required to display the content of the Website, Users can restrict or switch them off at any time.

Advertising Cookies are used to customize advertisements according to Users' interests, as well as to promote QUANTEK LLC and third-party services. We use advertising Cookies for their subsequent processing by advertising systems, which include Yandex. Direct and V Kontakte services. In such cases, Cookies are managed by third parties in accordance with QUANTEK LLC recommendations and solely for the purposes specified. You can find out more about the use of Cookies by the listed services and management capabilities in the relevant policies of the listed services (Privacy Policies, Cookies, Terms of Services, etc.). Advertising cookies require the User's

consent that can be revoked by the User at any time.

8.17.4. Management and rejection

To manage Cookies, Users can change settings of their web browser. Users can change user preferences, thereby rejecting Cookies and making certain components of the Website inaccessible. Instructions on how to do this are usually found in the “Help”, “Tools” or “Edit” sections of the browser settings. Some third-party sites allow to reject their Cookies directly through a special link.

The use of Cookies may be disabled or restricted, but it will be impossible to fully use all the functions of the Website without Cookies.

9. Responding to Subjects' Requests for Access to Personal Data. Updating, Correction, Deletion and Destruction of Personal Data

9.1. The information specified in part 7 of Article 14 of the Federal Law “On Personal Data” is provided to the personal data subject or their representative by the Operator when contacting or receiving a request from the personal data subject or their representative.

9.2. Information shall be provided in an accessible form and shall not include personal data relating to other personal data subjects, unless there are legitimate grounds for disclosing such personal data.

9.3. If the personal data subject's request does not reflect all the necessary information in accordance with the requirements of the Federal Law “On Personal Data” or the subject does not have access rights to the requested information, then a reasoned refusal is sent to them.

9.4. The request must contain information from the main document certifying the identity of the personal data subject or their representative, information confirming the personal data subject's participation in relations with QUANTEK LLC (contract number, date of contract conclusion, indicative verbal marking and/or other information), or information otherwise confirming the fact of personal data processing by QUANTEK LLC, and the signature (including electronic) of the personal data subject or their representative. The request may be sent as an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

9.6. The right of the personal data subject to access their personal data may be limited in accordance with part 8, Article 14 of the Federal Law “On Personal Data,” including if the personal data subject's access to their personal data violates the rights and legitimate interests of third parties.

9.7. QUANTEK LLC shall make the necessary changes within seven business days from the date on which the personal data subject or their representative provides information confirming that personal data is incomplete, inaccurate, or irrelevant.

9.8. QUANTEK LLC shall destroy data within seven business days from the date on which the personal data subject or their representative provides information confirming that personal data was illegally obtained or is not required for the specified processing purpose.

9.9. QUANTEK LLC shall notify the personal data subject or their representative about the changes made and measures taken and shall take reasonable measures to notify the third parties to whom the subject's personal data was transferred.

9.9. QUANTEK LLC must provide the required information to the agency authorized to protect the rights of personal data subjects upon a request from this agency within thirty days after receiving the request.

10. Requirements for Personal Data Protection Established by QUANTEK LLC

10.1. Protection of personal data during its processing in QUANTEK LLC shall be performed in accordance with the legislation of the Russian Federation and the requirements of the competent public authority responsible for protection of the personal data subjects' rights, the federal executive body authorized in the field of security and the federal executive body authorized in the field of counteraction to technical intelligence and technical protection of information.

10.2. QUANTEK LLC takes necessary organizational and technical measures to protect personal data from accidental or unauthorized access, destruction, change, access lock and other unauthorized actions.

10.3. The protection measures implemented by QUANTEK LLC for processing personal data include:

- adoption of local regulations and other documents regarding processing and protection of personal data;
- appointment of officials responsible for personal data security in subdivisions and information systems of QUANTEK LLC;
- setting up training and methodological work with employees engaged in personal data processing for QUANTEK LLC;

- ensuring the conditions required to work with tangible media and information systems in which personal data is processed;
- organizing accounting of tangible media with personal data and information systems, in which personal data is processed;
- storing tangible media with personal data in compliance with conditions that ensure the safety of personal data and prevention of unauthorized access to such data;
- separation of personal data processed without the use of automation means from other information;
- ensuring separate storage of tangible media with personal data, which contain personal data of different categories or contain personal data, which is processed for different purposes;
- prohibition against transfer of personal data via open communication channels, computer networks and the Internet without applying measures for personal data protection implemented by QUANTEK LLC;
- ensuring protection of documents containing personal data on paper-based and other tangible media during their transfer to third parties using postal services;
- internal control over compliance with the legislation of the Russian Federation and QUANTEK LLC normative documents during personal data processing.
- identification of security threats to the personal data during its processing.

10.4. Liability for violating the requirements of the legislation of the Russian Federation and QUANTEK LLC's regulatory documents on personal data protection and processing is determined by the legislation of the Russian Federation.

11. Organizational Structure of Personal Data Protection

The organizational structure of personal data protection by the Operator:

- 11.1. QUANTEK LLC CEO. Organizes the structure of personal data protection by the Operator.
- 11.2. Committee on Classification of Personal Data Information Systems. Reports to the QUANTEK LLC CEO. Determines the types of threats to personal data security and the levels of personal data protection during processing in personal data information systems of QUANTEK LLC.
- 11.3. The person in charge of personal data protection. Reports to the QUANTEK LLC CEO. Develops, organizes, and implements measures to ensure personal data protection in QUANTEK LLC.
- 11.4. QUANTEK LLC information security administrator. Reports to the QUANTEK LLC CEO. Manages the procedures ensuring personal data security during its processing in personal data information systems of QUANTEK LLC.
- 11.5. Heads of structural divisions engaged in personal data processing. Report to the QUANTEK LLC CEO and the person in charge of personal data protection. Responsible for compliance of processing and ensuring the personal data security with the procedure established by QUANTEK LLC.
- 11.6. Employees of structural divisions processing personal data. Report to the heads of structural divisions. Process personal data and ensure its security in the manner established by QUANTEK LLC.
- 11.7. Measures to ensure personal data security in the organization can also be developed and implemented on a contractual basis by third-party organizations that have the appropriate licenses.

12. Measures to Ensure Personal Data Security During Automated and Non-Automated Processing

Measures to ensure personal data security during automated and non-automated processing include:

- 12.1. Determining the scope of personal data information systems of the Operator;
- 12.2. Determining the list and type of personal data security threats relevant to the Operator's personal data information systems;
- 12.3. Determining the required level of personal data security during its processing in the Operator's personal data information systems;
- 12.4. Creating a personal data protection system, including organizational and technical measures to ensure the security of personal data, including:
 - Appointing people responsible for the organization of personal data processing in the Company;
 - Appointing people responsible for the security of personal data processed in personal data information systems of the Operator;
 - Approving the list of employees who require access to personal data processed in personal data information systems for performing their official duties;
 - Conducting regular employee trainings on personal data processing and security;
 - Establishing a security regime on the premises, where technical means of personal data information systems are installed, preventing uncontrolled access to such premises by people not entitled to access such premises;

- Ensuring security of personal data media storage places and security of the media itself;
- Using information protection tools that have passed the established procedure of compliance assessment, including encryption (cryptographic) information protection tools;
- Management of access to information resources of personal data information systems;
- Redundancy of technical tools, ensuring redundancy of arrays and personal data media;
- Using protected communication channels when transferring personal data via public communication networks (the Internet);
- Preventing malicious programs and implants from access into personal data information systems;
- Detecting intrusions into personal data information systems, which violate or create prerequisites for violation of the established requirements for personal data protection;
- Analyzing the security of personal data information systems, involving the use of specialized software tools;
- Using anti-virus protection tools;
- etc.

12.5. The type of threats to personal data security and the necessary level of personal data protection during its processing in the Operator's personal data information systems is determined by the Committee on Classification of Personal Data Information Systems according to the provisions of Decree of the Government of the Russian Federation No. 1119 "On Approval of the Requirements for Protection of Personal Data During Their Processing in Personal Data Information Systems" dated November 1, 2012. The structure and powers of the Committee on Classification of Personal Data Information Systems shall be determined by order of the QUANTEK LLC CEO.

12.6. The Committee's decision on the types of threats to personal data security and the levels of personal data protection during its processing in the personal data information systems of QUANTEK LLC shall be documented in a corresponding report.

12.7. An evaluation of the effectiveness of measures implemented within the personal data protection system to ensure the security of personal data shall be performed:

- Before commissioning the personal data information system;
- Regularly, with the assessment frequency established by the Company (but not less frequently than required by the applicable laws of the Russian Federation).

12.8. Third-party organizations licensed to carry out activities related to technical protection of confidential information may be engaged on a contractual basis to assess the effectiveness of the implemented security measures.

12.9. An evaluation of the effectiveness of the implemented personal data protection measures may be carried out as part of the certification of personal data information systems.

12.10. The specific features for ensuring personal data protection during its processing without the use of automation are defined by Decree of the Government of the Russian Federation No. 687 "On Approval of the Regulations on the Specifics of Processing Personal Data Carried Out Without the Use of Automation" dated September 15, 2008 and by separate local regulations of the Provider regarding non-automated personal data processing.

13. Storage of personal data

13.1. Personal data of subjects can be obtained, further processed and transferred to storage both on paper and digitally.

13.2. Personal data recorded on paper is stored in lockable cabinets or in lockable rooms with limited access rights.

13.3. Personal data of subjects processed using automation tools for different purposes are stored in different folders.

13.4. Storing and sharing documents containing personal data in open electronic directories (file sharing sites) in ISPD is not allowed.

13.5. Storage of personal data in a way that allows to identify the personal data subject shall be performed no longer than the purposes of its processing require. Such personal data is subject to destruction upon achievement of the processing purposes or in case their achievement is no longer need.

14. Destruction of personal data

14.1. Destruction of personal data is an action leading to destruction of the contents of personal data in the personal data information system beyond restoration and (or) to destruction of the tangible media with personal data;

14.2. Destruction of the documents (tangible media) containing personal data shall be performed by burning, crushing (shredding), chemical decomposition, transforming it into a shapeless mass or powder. Destruction of paper documents using a shredder is allowed.

14.3. Personal data on electronic media is destroyed by erasing or formatting the media.

14.4. The fact of destruction of the personal data is confirmed by a documented act of destruction of media.

14.5. In case of unlawful processing of personal data, performed by the Operator or by a person acting on behalf of the Operator, the Operator must cease such unlawful processing of personal data or ensure the termination

of illegal processing of personal data by a person acting on behalf of the Operator within a period not exceeding three working days from the date of such detection. In case it is impossible to ensure the correctness of personal data processing, the Operator must destroy such personal data within a period not exceeding ten working days from the date of detecting unlawful processing of personal data. Following the termination of processing of personal data or destruction of personal data, the Operator must notify the personal data subject (or their representative). In case the request of the personal data subject (or their representative) or the request of the competent public authority responsible for protection of the personal data subjects' rights were sent by the competent public authority responsible for protection of the personal data subjects' rights, the Operator must also notify the specified authority.

14.6. In the absence of the possibility of destruction of personal data during the periods specified in paragraph 14.5 of this Policy, the Operator shall block such personal data or ensure its blocking (if the personal data processing is performed by a person acting on behalf of the Operator) and ensure the destruction of personal data within a period not exceeding six months, unless another period is established by federal laws.

14.7. If the competent public authority responsible for protection of the personal data subjects' rights decides to prohibit or restrict the cross-border transfer of personal data provided for in Part 8 or 12 of Article 12 of the Federal Law "On Personal Data", the Operator is obliged to ensure the destruction of the personal data previously transferred by the authority of a foreign state, a foreign individual, a foreign legal entity.