

INSTRUCTION FOR PROCESSING PERSONAL DATA

One Party, in accordance with the Federal Law of the Russian Federation No. 152-FZ "On Personal Data" dated July 27, 2006 (hereinafter referred to as the "Law"), acts as the Personal Data Operator (hereinafter the "Operator") and instructs the other Party (hereinafter the "Receiving Party") to process Personal Data in accordance with this Instruction for the processing of Personal Data.

The Receiving Party acts as a person processing Personal Data (hereinafter referred to as "Personal Data" or "PD") on behalf of the Operator.

The Receiving Party shall process Personal Data on behalf of the Operator to ensure proper performance of the Agreement. Before issuing an instruction to process Personal Data, the Operator must obtain the consent of the data subjects for the processing and transfer of their Personal Data to a third party (the Receiving Party). The Operator shall communicate to the Receiving Party, in a form specified by the Operator, the list of purposes for which Personal Data are transferred, as well as the actions (operations) to be performed with the Personal Data under this Instruction.

Instruction

Purposes for which Personal Data are transferred to a third party	Actions to be performed with Personal Data	Personal Data
<i>Here, specify the purposes for which the Personal Data is being transferred to the third party (e.g., to ensure information interaction, such as the functioning of IT infrastructure).</i>	<i>For example: collection; recording; systematization; accumulation; storage; updating (amendment, modification); retrieval; transfer (provision, distribution, access); use; blocking; deletion; destruction.</i>	<i>Other Personal Data: surname, first name, patronymic; position; department; address; email address; IP address of workstation; mobile phone number; work phone number; photo.</i>

The Receiving Party, while processing Personal Data under the Operator's Instruction, may perform the following actions (operations) with such data, using automated means or without such means: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (provision, access), anonymization, blocking, deletion, and destruction.

The specific list of actions (operations) to be performed with Personal Data under the Instruction shall be specified by the Operator in the Instruction. The Instruction shall be deemed

accepted and agreed upon by the Parties from the date the Operator sends it to the Receiving Party's email address specified in the Agreement for electronic communication.

Upon receipt of the Instruction for the processing of Personal Data, the Receiving Party must, within 2 (two) business days, send the Operator a confirmation of receipt of the Instruction. Failure by the Receiving Party to confirm receipt of the Instruction shall not be considered grounds for refusing to fulfill the obligations agreed upon by the Parties in this document.

Collection of Personal Data under Instruction

1. If the Receiving Party is instructed to process Personal Data by collecting it directly from data subjects based on their consent to the processing of Personal Data (per Clause 1, Part 1, Article 6 of the Law), the Operator is obligated to provide the Receiving Party with a form for obtaining such consent.

2. Upon the Operator's request, and no later than 10 calendar days from the date of receiving such a request, the Receiving Party shall provide confirmation of having obtained consents from data subjects whose Personal Data has been collected.

3. The Parties agree that confirmation of consent to the processing of Personal Data shall be provided in the form of written consents bearing the signature of the data subject.

4. In the event of termination of the Instruction or the Agreement, the Receiving Party shall provide the Operator with confirmations of all consents obtained from data subjects whose Personal Data was collected during the entire period of validity of this Instruction.

Measures to ensure compliance with legal requirements

5. While processing Personal Data under the Instruction, the Receiving Party is obligated to adhere to the principles set forth in Article 5 of the Law, maintain the confidentiality of Personal Data, and ensure its security.

6. The Receiving Party, when processing Personal Data, must take the necessary and sufficient measures to fulfill its obligations as required by the legislation of the Russian Federation, including Article 18.1 of the Law:

6.1. Appoint a person responsible for organizing the processing of Personal Data.

6.2. Issue documents that define the policy regarding the processing of Personal Data, as well as internal regulations on the processing of Personal Data, in accordance with Clause 2, Part 1, Article 18.1 of the Law.

6.3. Conduct internal control and/or audits to ensure compliance of Personal Data processing with the Law, regulations adopted in accordance with it, requirements for the protection of Personal Data, the Receiving Party's policy on Personal Data processing, and internal regulations.

6.4. Perform an assessment of the potential harm that may be caused to data subjects in the event of a breach of the Law, as well as evaluate the adequacy of measures taken to prevent such harm, in line with the requirements of the Law.

6.5. Familiarize employees directly involved in the processing of Personal Data with the provisions of the Russian Federation's legislation on Personal Data, including requirements for data protection, documents defining the policy on Personal Data processing, internal regulations on Personal Data processing, and/or provide training to such employees.

Requirements for Personal Data protection

7. The Parties are obligated to comply with the requirements for the protection of processed Personal Data in accordance with Article 19 of the Law:

7.1. Identify potential threats to the security of Personal Data that are transferred for processing, particularly if such data will be processed in Personal Data information systems.

7.2. If the Personal Data transferred for processing will be processed in Personal Data information systems, the level of data protection must be determined and the requirements established by the Government of the Russian Federation Decree No. 1119 dated November 1, 2012, "On Approval of Requirements for Personal Data Protection in Information Systems" must be followed.

7.3. Assess the potential harm to data subjects in the event of a breach of Personal Data security, specifically regarding the data entrusted for processing, if security threats materialize.

7.4. Use information security measures that have undergone the established conformity assessment procedure.

7.5. Evaluate the effectiveness of measures taken to ensure the security of Personal Data entrusted for processing before the deployment of the Personal Data information system.

7.6. Maintain an inventory of machine-readable data carriers if the Personal Data entrusted for processing will be stored on them.

7.7. Detect instances of unauthorized access to Personal Data entrusted for processing and take the necessary measures in response.

7.8. Restore Personal Data that has been modified or destroyed as a result of unauthorized access.

7.9. Establish rules for accessing Personal Data that is entrusted for processing and managed within Personal Data information systems, ensuring the registration and logging of all actions performed with Personal Data within the system.

7.10. Monitor the effectiveness of measures taken to protect Personal Data and the level of security of the information systems in which Personal Data is processed.

8. When collecting Personal Data, including via the Internet, the Receiving Party must ensure the recording, systematization, accumulation, storage, updating (modification, clarification), and retrieval of Personal Data of Russian Federation citizens using databases located within the territory of the Russian Federation, except as otherwise provided by the Law.

Confirmation of the Receiving Party's compliance with obligations established in the Instruction

9. Throughout the term of this Agreement, the Operator shall have the right to request, and the Receiving Party shall be obligated to provide, within 10 business days from the date of receiving such a request from the Operator, information (including documents) confirming the implementation of measures and compliance with the requirements set forth in this document and the legislation of the Russian Federation for the purpose of fulfilling the Instruction.

Notification of a Security Incident

10. In the event that it is determined that there has been an unauthorized or accidental transfer (provision, dissemination, access) of Personal Data that has resulted in a violation of the rights of data subjects, the Receiving Party is obligated, upon discovery of such an incident, to notify the Operator as follows:

10.1. Without undue delay (within 12 hours from the time the incident is identified):

10.1.1. Provide details of the incident, including a list of the Personal Data involved, categories of data subjects affected, and the number of data subjects impacted by the incident.

10.1.2. Explain the presumed causes that led to the violation of the rights of the data subjects.

10.1.3. Assess the potential harm caused to the rights of the data subjects.

10.1.4. Detail the measures taken to mitigate the consequences of the incident.

10.1.5. Identify the person authorized by the Receiving Party to respond to and investigate the incident.

10.2. Within 48 (forty-eight) hours, provide the results of an internal investigation of the incident, including information about the individuals whose actions caused the incident, if applicable.

Destruction of Personal Data

11. Upon the Operator's request, the Receiving Party must destroy certain personal data specified by the Operator, or all personal data entrusted to it for processing, within 15 calendar days from the date of receiving the request, provided that the processing of such data is no longer required under the laws of the Russian Federation.

12. Throughout the duration of this Instruction, the Operator has the right to request copies of documents from the Receiving Party, including records of events within the Receiving Party's information systems, that confirm the destruction of personal data transferred for processing. Such copies must be provided no later than 5 business days from the date of receiving the relevant request.

13. If it is not possible to destroy personal data within 15 calendar days from the receipt of the request, the Receiving Party shall block such personal data and ensure its destruction within a period not exceeding 6 months. The Receiving Party must notify the Operator of the data blocking no later than 15 calendar days from the date of receiving the request.

14. If it is not possible to destroy the personal data upon request due to the necessity of processing it in compliance with the requirements of the legislation of the Russian Federation, the Receiving Party must provide a justified explanation for the inability to destroy or block the personal data within 15 calendar days from the date of receiving the request from the Operator.

Subcontracting of Personal Data Processing

15. The Operator authorizes the Receiving Party to subcontract the processing of personal data to third parties (hereinafter referred to as "Sub-processors").

16. Subcontracting the processing of personal data is permitted under the following conditions:

16.1. The Receiving Party must notify the Operator about the possibility of subcontracting personal data processing to a Sub-processor via the email address specified in the Instruction, at least 15 (fifteen) business days before the actual engagement of the Sub-processor. The notification must include the Sub-processor's name, Taxpayer Identification Number (INN), registered address, contact phone number, and email address.

16.2. Engaging Sub-processors for personal data processing shall only be permitted through their proper accession to the Instruction, provided they unconditionally accept all the provisions of the Instruction in its current version.

16.3. Prior to commencing the fulfillment of the Instruction, Sub-processors must implement all necessary security measures (legal, organizational, and technical) required for personal data processing as stipulated in the Instruction.

Liability of the Parties

17. In accordance with Part 5 of Article 6 of the Law, the Operator bears sole responsibility towards data subjects whose personal data are being processed. The Receiving Party, which processes personal data under the Operator's Instruction, shall be liable solely to the Operator.

18. If the rights of data subjects, whose personal data were processed by the Receiving Party, are violated, thereby causing damage to the Operator, the Receiving Party is obligated to compensate for such damage within 30 (thirty) calendar days from the date of receiving a corresponding written demand from the Operator.