

APPROVED BY

General Director,

Project First LLC

Z.S. Babak

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Project First LLC
Personal Data Processing Policy
on the data subjects of the company contractors

1. General Provisions

1.1. This Policy of the Project First Limited Liability Company on the processing of personal data (hereinafter referred to as the Policy) has been developed in compliance with the requirements of the Constitution of the Russian Federation, the Labor Code of the Russian Federation, the Civil Code of the Russian Federation, the Tax Code of the Russian Federation, Federal Law No. 149-FZ of 27.07.2006 "On Information, Information Technologies and the Protection of Information", Federal Law No. 63-FZ dated 06.04.2011 "On Electronic Signature", Federal Law No. 129-FZ dated 08.08.2001 "On State Registration of Legal Entities and Individual Entrepreneurs", Federal Law No. 14-FZ dated 08.02.1998 "On Limited Liability Companies", Federal Law No. 118-FZ dated 07.08.2001 "On Countering Legalisation (Money Laundering) of Criminal Income and the Funding of Terrorism", paragraph 2 of Part 1 of Article 18.1 of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" (hereinafter referred to as the Law on Personal Data) in order to ensure the protection of human and civil rights and freedoms when processing one's personal data, including protection of the rights to privacy, personal and family secrets.

1.2. The Policy applies to all personal data processed by the **Project First Limited Liability Company** (hereinafter referred to as the Operator, Project First LLC).

1.3. The Policy applies to relations in personal data processing that have arisen with the Operator both before and after the approval of this Policy.

1.4. Requests of data subjects regarding the processing of their personal data by the operator are accepted at the following address: 19-14, 1st Spasnalivkovsky pereulok, Moscow, 119049.

Data subjects may also send their request, signed with an enhanced qualified electronic signature to the e-mail address: info@projectfirst.tv.

1.5. In compliance with the requirements of Part 2 of Article 18.1 of the Law on Personal Data, this Policy is published in free access on the Internet information and telecommunications network on the Operator's website.

1.6. Basic concepts used in the Policy:

personal data means any information relating to an identified or identifiable natural person ("**data**

subject");

personal data operator (operator) means a state body, municipal body, legal entity or natural person independently or jointly with other persons organizing and (or) processing personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data;

personal data processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means;

automated processing of personal data means processing of personal data using computer technology;

personal data dissemination means actions aimed at disclosure of personal data to an indefinite circle of persons;

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

destruction of personal data means actions resulting in the impossibility to restore the content of personal data in the information system of personal data and (or) resulting in the destruction of data media;

personal data information system means a set of personal data contained in relevant databases and information technologies and technical means for their processing.

1.7. Basic Rights and Obligations of the Operator.

1.7.1. The Operator has the right to:

- 1) independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations under the Law on Personal Data and regulations adopted in accordance therewith, unless otherwise provided by the Law on Personal Data or other federal laws;
- 2) if the data subject withdraws consent to process personal data, the Operator has the right to continue processing personal data without consent of the data subject solely on the grounds specified in the Law on Personal Data .

1.7.2. The Operator is obliged to:

- 1) organize the processing of personal data in accordance with the requirements of the Law on Personal Data;
- 2) respond to requests and inquiries of data subjects and their legal representatives in accordance with the requirements of the Law on Personal Data;
- 3) report to the authority responsible for protecting the rights of data subjects (Federal Service for Supervision of Communications, Information Technology, and Mass Media (Roskomnadzor)) necessary information requested by this authority within 10 business days from the date of receipt of such a request;
- 4) in the manner prescribed by the federal executive body authorized in the field of security, ensure interaction with the state system of detection, prevention and elimination of effects of computer attacks on information resources of the Russian Federation, including reporting on computer incidents that resulted in unlawful transfer (provision, dissemination, disclosure) of personal data.

1.8. Basic Rights of the Data Subject.

1.8.1. The data subject has the right to:

- 1) receive information concerning the processing of his/her personal data, except in cases provided for by federal laws. The operator provides data subject with information in an accessible form, and it must not contain personal data relating to other data subjects, except in cases where there are legitimate grounds for the disclosure of such personal data;
- 2) require the operator to clarify his/her personal data or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or unnecessary for the stated purpose of processing, as well as to take statutory measures to protect his/her rights;
- 3) appeal to Roskomnadzor or in court against illegal actions or inaction of the Operator when processing his/her personal data.

1.9. Supervision over the fulfillment of the requirements of this Policy is carried out by an authorized person responsible for organizing the processing of personal data from the Operator.

1.10. Liability for violating requirements of the legislation of the Russian Federation and the regulations of Project First LLC in the processing and protection of personal data is determined in accordance with the legislation of the Russian Federation.

2. Personal Data Collection Purposes

2.1. The processing of personal data is limited to achieving specific, predetermined and legitimate purposes. Processing of personal data that is incompatible with the purpose of personal data collection is not allowed.

2.2. Only personal data that meets the purposes of their processing are subject to processing.

2.3. The Operator processes personal data for the purposes as follows:

- to ensure compliance with the Constitution of the Russian Federation, federal laws and other regulations of the Russian Federation;
- to carry out its activities in accordance with the Charter of Project First LLC;
- to conclude, execute and terminate civil law contracts with physical or legal entities;
- to maintain records management and document accounting within the framework of the activities of the Project First LLC,
- to provide legal support to Project First LLC, including execution of powers of attorney;
- to fill out and submit to the executive authorities and other authorized organizations the required reporting forms;
- to exercise civil-law relations;
- to maintain accounting records.

2.4. Processing of employees' personal data may be carried out solely for the purpose of ensuring compliance with laws and other regulations.

3. Legal Framework for Personal Data Processing

3.1. The legal framework for the personal data processing is a set of laws and regulations, pursuant to which and in accordance with which the Operator carries out the processing of 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 No. 14-FZ dated 08.02.1998 "On Limited Liability Companies";
- Federal Law No. 402-FZ dated 06.12.2011 "On Accounting";
- other regulations governing Operator's activities.

3.2. The legal framework for processing personal data also includes:

- Charter of Projects First LLC;
- contracts concluded between the Operator and data subjects;
- consent of data subjects to processing their personal data.

4. Scope and Categories of Personal Data Processed, Categories of Data Subjects

4.1. The content and scope of processed personal data must be consistent with the stated processing purposes set forth in Section 2 of this Policy. Processed personal data must not be excessive in relation to the stated purposes of its processing.

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

4.2.1. The Operator's counterparties (natural persons):

- citizenship;
- last name, first name, patronymic;
- gender, age;
- date and place of birth;
- passport data (including passport photo – not for the purposes of identification of the data subject);
- address of registration at the place of residence and/or address of actual residence;
- contact details;
- personal signature;
- data of documents on education, qualifications, vocational training, information on advanced training, information on professional activity;
- individual taxpayer number;
- SNILS (insurance certificate number);

- information on the application of the "Professional Income Tax" tax regime (including the period of application of this regime);
- bank details, income information;
- OGRNIP (registration number) (if the individual is an individual entrepreneur);
- other personal data provided by contractors (physical entities) necessary for the conclusion and execution of contracts.

4.2.2. Representatives of the Operator's counterparties (legal entities):

- last name, first name, patronymic;
- passport data (including passport photo – not for the purposes of identification of the person);
- contact details;
- position held (post);
- other personal data provided by representatives of counterparties, necessary for the conclusion and fulfillment of contracts.

4.3. The Operator does not process biometric personal data (information that characterizes the physiological and biological characteristics which allow or confirm the unique identification of the natural person).

4.4. The Operator does not process special categories of personal data relating to race, ethnicity, political views, religious or philosophical beliefs, health status, intimate life, except in cases provided for by Russian law.

5. Procedure and Conditions of Personal Data Processing

5.1. The Operator processes personal data in accordance with the requirements of the legislation of the Russian Federation.

5.2. Project First LLC is entitled to perform the following actions with personal data as part of the processing of the latter:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- refinement (update, change);
- retrieval;
- usage;
- anonymization;
- removal;
- destruction.

5.3. Personal data is processed with the consent of data subjects, as well as without such consent in cases

provided for by the laws of the Russian Federation.

5.4. The Operator carries out both automated and non-automated personal data processing.

5.5. Personal data may be processed by the Operator's employees whose job duties include personal data processing.

5.6. Personal data is processed by:

- receiving personal data verbally and in writing directly from the data subjects;
- obtaining personal data from the public domain;
- entering personal data into the logs, registers and information systems of the Operator;
- using other methods of personal data processing.

5.7. Disclosure of personal data to third parties and distribution of personal data without consent of the data subject is not allowed, unless otherwise provided by federal law. Consent for personal data processing, authorized by the data subject for dissemination, is executed separately from other consents of the data subject for the processing of his/her personal data.

Requirements for the content of consent to the processing of personal data given by the data subject for dissemination was approved by Order of Roskomnadzor No. 18 from 24.02.2021.

5.8. Sharing personal data with bodies of inquiry and investigation, Federal Tax Service, Pension Fund of the Russian Federation, Social Insurance Fund and other authorized executive authorities and organizations is carried out in accordance with the requirements of the legislation of the Russian Federation.

5.9. The Operator shall take all necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, distribution and other unauthorized actions, i.e.:

- takes legal, organizational and technical measures to ensure protection of personal data;
- exercises internal supervision over the compliance of personal data with legal requirements, including the requirements of internal local regulations;
- defines threats to the security of personal data during its processing;
- adopts local regulations and other documents applicable to the processing and protection of personal data;
- appoints persons responsible for ensuring protection of personal data in the structural divisions 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 where personal data is processed;
- stores personal data in conditions that ensure its safety and exclude unauthorized access thereto;
- provides interaction with the state system of detection, prevention and elimination of computer attacks on information resources, including reporting of computer incidents.

5.10. The Operator stores personal data in a form that enables the identification of the data subject for no longer than required by the purposes of personal data processing, unless the period of storage of personal data is established by federal law, the contract.

6. Updating, Correction, Deletion, Destruction of Personal Data and Termination of their Processing, Responses to Requests from Data Subjects for Access to Personal Data

6.1. Confirmation of the personal data processed by the operator, legal framework and purpose of personal data processing, as well as other information specified in Part 7 of Article 14 of the Law on Personal Data are provided by the Operator to the data subject or his/her representative within 10 working days of the treatment or receipt of the request from the data subject or his/her representative. This period may be extended, but for no more than five working days. To do this, the Operator should send the data subject a reasoned notice stating the reasons for extending the period for providing the requested information.

The information provided does not include personal data relating to other data subjects, unless there is a legitimate reason for disclosing such personal data.

The request must contain:

- number of the main identification document of the data subject or his/her representative, information about the date of issue of the said document and the issuing authority;
- information confirming participation of the data subject in relations with the Operator (contract number, contract conclusion date, conventional word mark and (or) other information), or information otherwise confirming the fact of personal data processing by the Operator;
- Signature of the data subject or his/her representative.

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

The Operator provides the information specified in Part 7 of Article 14 of the Law on Personal Data to the data subject or his/her representative in the form in which the appeal or request is sent, unless otherwise stated in the appeal or request.

If the appeal (request) of the data subject does not reflect all the necessary information in accordance with the requirements of the Law on Personal Data or the subject does not have the right to access the requested information, he/she is sent a reasoned refusal.

The subject's right 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 subject's access to his/her personal data violates the rights and legitimate interests of third parties.

6.2. If the Operator, Roskomnadzor or any other interested party reveals the fact of unlawful or accidental transfer (disclosure, dissemination) of personal data (access to personal data), resulting in violation of the rights of data subjects, the Operator shall

- within 24 hours, notify Roskomnadzor of the incident, the alleged reasons for the violation of data subjects' rights, the alleged harm caused to data subjects' rights, and measures taken to eliminate the effects of the incident, as well as provide information about the person authorized by the Operator to interact with Roskomnadzor on issues related to the incident;

- within 72 hours, notify Roskomnadzor of the results of an internal investigation into the incident and provide information about the persons whose actions caused it (if any).

6.3. Upon achievement of the objectives of personal data processing, as well as in case of the subject's withdrawal of his/her consent to personal data processing, personal data shall be destroyed:

- unless otherwise provided by the contract, to which the data subject is a party;
- if the Operator cannot process personal data without consent of the data subject on the grounds provided by the Law on Personal Data or other federal laws;
- unless otherwise provided by another agreement between the Operator and the data subject.

6.4. If the data subject appeals to the Operator with a request to terminate the personal data processing within a period not exceeding 10 working days from the date the operator received the relevant request, the personal data processing is terminated, except as provided by the Law on Personal Data. The specified period may be extended, but for no more than five working days. To do this, the Operator should send the data subject a reasoned notice stating the reasons for extending the period.

7. Termination of Personal Data Processing

7.1. The term and/or condition for the termination of the personal data processing are:

- achieving the goals of personal data processing;
- termination of contractual relations;
- expiry of the document retention period;
- termination of the period provided by law, contract or consent of the data subject to the processing of his / her personal data;
- withdrawal by the data subject of his/her consent to the personal data processing;
- termination of the activity of Project First LLC;
- other grounds established by the legislation of the Russian Federation on the personal data processing.