

## Personal Data Processing and Protection Policy

This Policy regarding the processing and protection of personal data (hereinafter referred to as the Policy) defines the policy regarding the processing of personal data, contains information about the implemented requirements for the protection of personal data of the Operator.

### 1. Basic concepts

- 1.1. **Company** – Limited Liability Company «ARMOR», address: 86/A Ulitsa Nizhegorodskaya, room 5 room 12, Moscow, 109052, OGRN 1197746725230 INN/KPP 7722482814/772201001 (hereinafter also the Operator).
- 1.2. **Personal data subject (PD Subject)** – an individual who is directly or indirectly identified or determined on the basis of Personal Data related to him.
- 1.3. **User** – an adult individual who connects to the Website and/or the Application and uses its functionality (services) on the basis of and in accordance with the Offer.
- 1.4. **Processor** – a person who processes personal data on behalf of the Operator in accordance with the requirements of the legislation and this Personal Data Processing Policy.
- 1.5. **Website** – a set of programs for electronic computers and other information in the Internet information and telecommunications network, intended for display in a browser, accessed using domain names owned by the Company located at [https://armor.ru.com /](https://armor.ru.com/), as well as its subdomains or mirrors.
- 1.6. **Personal data (PD)** – information related directly or indirectly to a specific or identifiable natural person (personal data subject).
- 1.7. **Right holder** – Joint Stock Company «Kaspersky Lab», address: 39A/2 Leningradskoe Shosse, Moscow, 125212, OGRN 1027739867473 INN 7713140469, which owns all exclusive rights to the software;
- 1.8. **Software** – Kaspersky computer programs owned by the Right Holder, detailed information (name, functional characteristics) about which is posted on the Website;
- 1.9. **Authorisation** – the User enters his personal data, including an email address or mobile phone number, a temporary password, to gain access to the Software and activate it and log into his Personal Account.
- 1.10. **Personal Account** – a personalised section of the Website intended for the User and closed for public access. The User's access to the Personal Account is carried out through Authorisation on the Website;
- 1.11. **Activation key** – a unique code consisting of a set of characters (letters and/or numbers) intended for software activation.
- 1.12. **Counterparty** – a legal entity or individual entrepreneur with whom a paid contract has been concluded. The Counterparty can be a Partner.
- 1.13. **Partner** – the person to whom personal data is transferred for processing.

- 1.14. **Personal data processing** – any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematisation, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalisation, blocking, deletion, destruction of personal data.
- 1.15. **Depersonalisation of personal data** – an action that makes it impossible to determine the identity of personal data to a specific personal data subject without using additional information.
- 1.16. **Destruction of personal data** – actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which the material carriers of personal data are destroyed.

## 2. General provisions

- 2.1. This Policy has been developed in accordance with the Constitution of the Russian Federation, the Labor Code of the Russian Federation, the Civil Code of the Russian Federation, Federal Law No. 149-FZ of July 27, 2006 «On Information, Information Technologies and Information Protection», Federal Law No. 152-FZ of July 27, 2006 «On Personal Data», Resolution Government of the Russian Federation No. 1119 dated 01.11.2012 «On Approval of Requirements for the Protection of Personal Data during their Processing in Personal Data Information Systems», other federal laws and regulations.
- 2.2. The Personal Data Processing Policy applies to all personal data that may be obtained by the Company in the course of its activities, including from Users.
- 2.3. The Personal Data Processing Policy applies to all information that the Company may receive about the User during the use of the Website, services, or other services of the Company, and/or during the execution by the Company of any agreements and contracts with the User, including the possibility of sending information, including advertising.
- 2.4. The Operator's Counterparties are responsible for the compliance of PD processing with the applicable regulatory legal acts and the agreement (in their area of responsibility) of the following categories of personal data:
- 2.4.1. Subjects of Personal data, whose data is transmitted for processing to the Partner.
- 2.4.2. Individuals – representatives acting on behalf of the Counterparty.
- 2.4.3. Own personal data, if the Operator's Counterparty is an individual entrepreneur.
- 2.5. The security requirements for the transferred personal data between the Operator and the Partner are provided for by the contract concluded between them in accordance with the current legislation.
- 2.6. The processing of personal data of the representative of the Operator's Counterparty is allowed if it follows from the substance of the contract with the Counterparty.
- 2.7. The operator is obliged to comply with the following principles when processing personal data:
- 2.7.1. the processing of personal data must be carried out on a lawful and fair basis;

- 2.7.2. the processing of personal data should be limited to achieving specific, predetermined and legitimate goals. Processing of personal data incompatible with the purposes of personal data collection is not allowed;
- 2.7.3. it is not allowed to combine databases containing personal data, the processing of which is carried out for purposes incompatible with each other;
- 2.7.4. only personal data that meets the purposes of their processing is subject to processing;
- 2.7.5. the content and volume of personal data processed must correspond to the stated purposes of processing. The personal data being processed should not be redundant in relation to the stated purposes of their processing;
- 2.7.6. when processing personal data, the accuracy of personal data, their sufficiency, and, if necessary, their relevance to the purposes of personal data processing must be ensured. The Company must take the necessary measures or ensure that measures are taken to delete or clarify incomplete or inaccurate data;
- 2.7.7. the storage of personal data must be carried out in a form that makes it possible to identify the subject of personal data, no longer than the purposes of personal data processing require, unless the period of storage of personal data is established by federal law, an agreement to which the personal data subject is a party, beneficiary or guarantor. The processed personal data is subject to destruction upon achievement of the purposes of processing or in case of loss of the need to achieve these goals, unless otherwise provided by federal law.
- 2.8. The Company assumes that the User consciously determines his requests and controls the technical parameters of the equipment used by him, and has also read this Policy in full. If the User does not agree with the Policy, the use of the Website must be terminated.
- 2.9. This Policy is published on the Internet.

### **3. User consent**

- 3.1. The User accepts the terms of the Policy and gives the Operator informed and knowledgeable consent to the processing of his personal data on the terms stipulated by the Policy and the current legislation of the Russian Federation:
  - 3.1.1. When Authorisation is performed on the Website – for personal data that the User provides to the Operator by filling out an electronic form located on the Website. The user is considered to have given consent to the processing of his personal data at the moment of clicking the interactive button (putting a check mark) «I agree with the Offer and the Personal Data Processing Policy»;
  - 3.1.2. For any use of the Website – for personal data that is automatically transmitted to the Operator during the use of the Website using the Software installed on the User's device. The User is considered to have given consent to the processing of his personal data at the time of the start of using the Website.
- 3.2. The User's consent to the processing of his personal data by the Operator is valid from the date on which consent to their processing is provided (clause 3.1. of the Policy), and for the period necessary to achieve the purposes of personal data processing.

- 3.3. The User has the right to cancel consent to the processing of personal data by sending an application to the Operator in accordance with Section 14 of the Policy.
- 3.4. The Operator does not process personal data of persons who have not reached the age of legal capacity. If a person has not reached this age, they do not have the right to provide their personal data and consent to their processing by the Operator. In case of identification of the incapacity of a person who has provided his personal data without the permission of his legal representative, the Operator immediately blocks the processing of such personal data until the circumstances are clarified.

#### **4. Categories of data subjects**

- 4.1. The Operator processes personal data of the following categories of personal data subjects:
- 4.1.1. Operator's employees, dismissed employees, candidates for vacant positions, and similar categories whose processing is provided for by labor legislation (hereinafter referred to as Operator's Employees);
- 4.1.2. Users, Clients;
- 4.1.3. Representatives of the Operator's Counterparties, Operator's Counterparties.

#### **5. Purposes and grounds of personal data processing**

- 5.1. Personal data of the Operator's Employees, applicants, relatives of Employees and dismissed Employees are processed on the basis of Subclauses 1, 2, 7 of Clause 1 of Article 6 of Federal Law No. 152-FZ dated 27.07.2006 «On Personal Data», in order to comply with the provisions of the Labor Code of the Russian Federation (hereinafter also the LC RF), in order to comply with the provisions of the employment contract, as well as related to the Labor Code Russian Federation regulatory legal acts.
- 5.2. Personal data of Users and Clients regarding the use of the Website is processed in accordance with the provisions of Federal Law No. 152-FZ dated 27.07.2006 «On Personal Data», as well as with the User's consent in order to familiarise themselves with the Operator's services, the intention to conclude an agreement, and the execution of an agreement concluded by accepting an Offer by the User.
- 5.3. Personal data of Counterparties and representatives of Counterparties are processed in accordance with the provisions of Federal Law No. 152-FZ dated 27.07.2006 «On Personal Data», as well as with the consent of the Counterparty's representatives for the purpose of concluding and executing an agreement with the Counterparty.
- 5.4. Personal data of Users, Clients, Counterparties and representatives of Counterparties are processed in accordance with the provisions of Federal Law No. 152-FZ dated 27.07.2006 «On Personal Data» for the purpose of reviewing appeals and making decisions on them, informing about decisions taken, and providing information in connection with appeals.
- 5.5. Personal data of Users, Clients, Counterparties and representatives of Counterparties are processed in accordance with Subclauses 1, 7, 9 of Clause 1 of Article 6 of Federal Law No. 152-FZ dated 27.07.2006 «On Personal Data» for the purpose of conducting marketing research,

researching the degree of consumer satisfaction with the quality and characteristics of services, and statistical purposes.

5.6. Personal data may be used for other purposes if it is mandatory in accordance with the provisions of the legislation of the Russian Federation.

5.7. The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data incompatible with the purposes of personal data collection is not allowed.

## **6. Structure of the processed data**

6.1. The Operator processes the following categories of personal data of Employees: last name, first name, middle name, year of birth, month of birth, gender, age, profession, income, social status, job availability, passport data; information about a military ID (for those liable for military service), a certificate of INN assignment, an insurance pension certificate, files containing materials on advanced training and retraining, attestation, official investigations, account, house address, registration address, phone number, date of birth, job title, information about the change of full name, the nearest metro station, information about skills, health status, information about financial obligations, current account number, bank card details, citizenship, information about education.

6.2. The Operator processes the following categories of Users' personal data:

- phone number,
- email address.

6.3. The Operator processes the personal data of Counterparties and representatives of Counterparties: surname, first name, middle name (if any), job title, current account number, and other information provided for in the contract with the Counterparty.

6.4. When subjects use the Operator's personal data on the Website, the Operator processes data provided for by international data exchange protocols over the Internet, including (but not limited to): IP address, cookies, information about the user's browser (or other program that accesses the website), access time, the address of the requested page, and others visitor data from traffic statistics services (the address of the page where the ad block is located, the referrer (the address of the previous page), etc.), geolocation data, and other data, which are collected and processed automatically on sites owned by the Operator.

6.5. The storage period of personal data is determined by the agreement of the Personal data Subject:

6.5.1. The processing period for personal data of Employees is no more than 30 days from the date of loss of grounds for processing.

6.5.2. The deadline for processing personal data of Users/Counterparties (depending on which event comes first);

6.5.3. until their destruction by the Operator – in case of receipt from the User of a revocation of consent to the processing of personal data or a request for the destruction of personal data;

6.5.4. until the expiration of the consent period or the achievement of the purposes of personal data processing.

6.6. To ensure the storage of personal data on physical media, premises equipped with protective equipment are determined in accordance with the order of the enterprise. The storage of documents containing personal data completed by production is carried out in the archive or in a separate room (cabinet). The storage of tangible personal data carriers is carried out separately for each category of personal data subjects.

6.7. Consent to the processing of personal data may be revoked by the PD Subject. If the Personal data Subject withdraws consent to the processing of personal data, the Operator has the right to continue processing personal data without the consent of the personal data subject, provided there are grounds specified by applicable law.

## **7. Data subject rights**

7.1. The PD subject has the right to:

- apply for changes to the provided personal data, their deletion;
- require notification of all persons who have previously been provided with incorrect or incomplete personal data;
- send requests to the Operator regarding the processing of his personal data;
- request a list of their personal data processed by the Company and the source of their receipt;
- receive information about the processing time of your personal data, including the duration of their storage;
- require that all persons who have previously been provided with incorrect or incomplete personal data be notified of any exclusions, corrections or additions made to them;
- appeal to the authorised body for the protection of the rights of personal data subjects or in court against unlawful actions or omissions of the Operator during the processing of his personal data;
- exercise other rights stipulated by the current legislation.

7.2. PD subjects are obliged to:

- provide the Operator with reliable information about themselves;
- inform the Operator about the clarification (updating, modification) of their personal data.

7.3. Individuals who have provided the Operator with false information about themselves or information about another personal data subject without the latter's consent are liable in accordance with the legislation of the Russian Federation.

## **8. Operator rights and obligations**

8.1. The Operator has the right to:

- process personal data of the PD Subject in accordance with the stated purpose;
- require the PD Subject to provide reliable personal data necessary for the performance of the contract, the provision of services, the identification of the Personal Data Subject, as well as in other cases provided for by the legislation on personal data;
- restrict the PD Subject's access to his personal data if the Processing of personal data is carried out in accordance with the legislation on countering the legalisation (laundering) of proceeds from crime and the financing of terrorism, the PD Subject's access to his personal data violates the rights and legitimate interests of third parties, as well as in other cases provided for by law of the Russian Federation;
- process publicly available personal data of individuals;
- to process personal data subject to publication or mandatory disclosure in accordance with the legislation of the Russian Federation;
- entrust the processing of personal data to another person with the consent of the Personal Data Subject under the terms of this Policy.

#### 8.2. The Operator is obliged to:

- use the Personal Data received exclusively for the purposes specified in this Policy;
- ensure that Personal Data is kept confidential, not disclosed without the User's prior written permission, and not sold, exchanged, published, or otherwise disclosed by the User's personal data, except as required by law;
- take precautions to protect the confidentiality of the User's Personal Data in accordance with the procedure commonly used to protect such information in the current business environment;
- block personal data related to the relevant User from the moment of the application or request of the User or his legal representative or the authorised body for the protection of the rights of personal data subjects for the verification period, in case of identification of false personal data or illegal actions;
- Upon achieving the purposes of personal data processing, as well as in the case of revocation by the PD Subject of Consent to their processing, personal data is subject to destruction if the Operator is not entitled to process without the consent of the Personal data Subject on the grounds provided for by the Federal Law «On Personal Data» or other regulatory legal acts;
- The operator is obliged to inform the Personal Data Subject or his representative about the processing of such subject's personal data carried out by him at the request of the latter within 10 (Ten) business days from the date of receipt of the request of the personal data subject or his representative;
- The Operator also has other rights and other duties established by the Federal Law «On Personal Data».

### 9. Information about the implemented requirements for personal data protection

9.1. When processing personal data, the Operator takes the necessary legal, organisational and technical measures and ensures their adoption to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data, which are in particular (but not limited to):

- Appointment of a person responsible for the processing of personal data.
- Limitation of the number of employees who have access to personal data.
- Programmatic identification of Users, Operator employees and accounting of their actions.
- Implementation of anti-virus control and other measures against malicious software and mathematical effects.
- Use of information backup and recovery tools.
- Software updates when there are security fixes from manufacturers.
- Implementation of encryption when transferring personal data on the Internet.
- Taking measures related to the admission of only appropriate persons in the places where technical equipment is installed.
- The use of technical means of protecting the premises in which the technical means of personal data information systems are located, and places of storage of material personal data carriers.

9.2. The Operator ensures the security of personal data, in particular:

- taking into account the possible harm to the personal data subject, the amount and content of personal data being processed, the type of activity in which personal data is processed, and the relevance of threats to personal data security;
- the application of technical measures in accordance with the threats to the security of personal data during their processing in personal data information systems;
- the application of organisational and technical measures to ensure the security of personal data during their processing in personal data information systems necessary to meet the requirements for personal data protection, the realisation of which ensures the levels of personal data established by the Government of the Russian Federation;
- assessment of the effectiveness of measures taken to ensure the security of personal data prior to the start of work in the personal data information system conducted by the Company;
- taking into account the machine media of personal data, in case of their use;
- procedures related to the detection of unauthorised access to personal data and taking measures;
- recovery of personal data modified or destroyed due to unauthorised access to them;



- establishing rules for access to personal data processed in the personal data information system, as well as ensuring registration and accounting of all actions performed with personal data in the personal data information system;
- control over the measures taken to ensure the security of personal data and the level of security of personal data information systems.

## **10. Confidentiality**

10.1. The Operator and other individuals who have gained access to personal data are obliged not to disclose or distribute personal data to third parties without observing the principle based on the consent of the PD Subject, except in cases provided for by applicable law.

10.2. Employees of the Company who are authorised to Process Personal Data are required to:

- to know and strictly comply with the provisions of the legislation of the Russian Federation in the field of Personal Data, this Policy, and the Company's local acts on Personal Data Processing and security;
- process Personal Data only within the scope of their official duties;
- Do not disclose Personal Data processed by the Company;
- Report the actions of others that may lead to a violation of the provisions of this Policy;
- Report known violations of the requirements of this Policy to the person responsible for organising the processing of Personal Data in the Company.

10.3. With regard to the User's Personal Data, their confidentiality is maintained, except in cases where the User voluntarily provides information about himself for general access to an unlimited number of people.

10.4. The Operator has the right to transmit the User's Personal Data to third parties in the following cases::

- The personal data subject has clearly expressed his agreement to such actions in the ways specified in the Policy;
- The transmission of Personal Data is provided for by Russian or other applicable legislation;
- The transmission takes place as part of a sale or other transfer of a business (in whole or in part), while all obligations to comply with the terms of this Policy in relation to the personal information received by the acquirer are transferred to the buyer;
- As a result of processing the User's personal information by depersonalizing it, anonymised statistical data may be obtained, which are transmitted to a third party for research, performance of work or provision of services on behalf of the Operator.

10.5. In case of loss or disclosure of personal data, the Operator informs the User about this fact immediately in accordance with the procedure established by the Company's local acts.

10.6. The Company's Website uses cookies, which are applied in accordance with the conditions described in the Cookie Policy.

## **11. Third party transfer**

- 11.1. The Operator does not process personal data across borders. When storing personal data using contractors' ISPs, the Operator uses databases located on the territory of the Russian Federation.
- 11.2. The Operator may share personal data with other individuals, hosting providers, analytics services, and others in order to fulfill the contract concluded with the Customer (Partners).
- 11.3. The Operator guarantees the conclusion of an appropriate order for the processing of personal data in case of involvement of Partners in accordance with the contractual powers of the Operator.
- 11.4. The Operator has the right to transmit personal data to the investigations and preliminary inquiries and other authorised authorities on the grounds provided for by the current legislation of the Russian Federation.

## **12. Exceptions to processing**

- 12.1. The Operator does not process:
  - biometric personal data (information that characterises the physiological and biological characteristics of a person, on the basis of which it is possible to establish his identity),
  - special categories of personal data (relating to race, nationality, political views, religious or philosophical beliefs, health status, intimate life).

## **13. Final provisions**

- 13.1. The period of processing of personal data processed by the Operator may be determined (redefined) by the Operator's organisational and administrative documents in accordance with the provisions of the Federal Law «On Personal Data».
- 13.2. This Policy is subject to changes and additions in the case of new legislative acts and special regulations on the processing and protection of personal data, as well as by decision of the Operator. The Operator makes changes to this Policy without the User's agreement and prior notification to the User. The updated version of the Policy comes into force from the moment it is posted on the Website, unless otherwise provided by the new version of the Policy. When making changes to the current version, the date of the last update is indicated.
- 13.3. Compliance with the requirements of this Policy is monitored by the person responsible for organising the processing of personal data.
- 13.4. Issues not regulated by this Policy are governed by the current legislation of the Russian Federation.
- 13.5. The User has the right to send all suggestions, requests or questions regarding this Policy to the Operator's address: 86/A Ulitsa Nizhegorodskaya, room 5 room 12, Moscow, 109052, or by e-mail support@armor.ru.com.