

## Personal Data Processing and Protection Policy

Version effective as of June 7, 2023

This Personal Data Processing and Protection Policy (hereinafter, the "Policy") is adopted and effective at Selectel LLC, located at bldg. A, 21 Tsvetochnaya st., 196006 St. Petersburg (hereinafter, the "Company").

We collect, use and store personal data (information directly or indirectly relating to you) that you provide to us when you use our website [selectel.ru](https://selectel.ru), including subdomains (the "Website"), including subdomains, from any device and when you communicate with us in any form, in accordance with this Policy and the Cookie Policy.

By using our Website and providing us with your personal data, you consent to the processing of your personal data in accordance with this Policy and the [Cookie Policy](#).

### On what basis do we process data?

The Company processes your personal data on the basis of the Constitution of the Russian Federation, the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (ETS № 108, concluded in Strasbourg on 28.01.1981), Federal Law of the Russian Federation № 152-FZ of 27.07.2006. "On Personal Data", other federal laws and regulations of the Russian Federation which define the cases and specifics of processing personal data and ensuring security and confidentiality of such information, and your consent given when registering on the Website or using the Website.

### What data do we collect?

We collect the following personal data of non-registered and registered users through the Website:

Purposes	Personal data
Providing you with information about the Company, our services and events, organizing your participation in our events and surveys, sending you our news materials, communication with you	Personal data you provide to us when filling in the information fields on the Website, when filling in the contact form, when subscribing to the newsletter, when registering for events, such as your name, telephone number, e-mail address
Compliance with agreements between you and the Company, such as the User Agreement and the terms and conditions for the provision of certain services of the Company ( <a href="https://selectel.ru/about/documents/">https://selectel.ru/about/documents/</a> ), including registering you on the Website to give you access to its individual sections, including the creation of an account, exercising the powers and performance of the duties imposed on the Company by the legislation of the Russian Federation, receiving feedback from you on your use of the Company's services, learning about your use of the Company's services	Personal data you provide to us when filling in the information fields on the Website when you register to conclude a contract, as well as when you accept an offer, such as your name, telephone number, e-mail address, location, tax resident status, your payment card details, other payment information provided by you
Recruiting and selecting candidates for employment with the Company	Personal data contained in the messages and files you send us, including when applying for

	our vacancies, such as your name, telephone number, e-mail address, age, education, work experience, address, other personal information provided by you
Ensuring the operation and security of the Website and improving the Company's services, generation of statistics on visits	Technical data automatically transmitted by the device through which you use the Website, including device specifications, IP address, information saved in cookies sent to your device, browser information, date and time of access to the Website, addresses of requested pages and other similar information, HTTP headers, web beacons/pixel tags, browser ID data, geolocation information, hardware and software information; Information about your activity while using the Website (e.g., search query history, files stored on Website systems)

### **What are the methods of data processing?**

We process your personal data with and without the use of means of automation by collecting, recording, systematizing, accumulating, storing, clarifying (updating, changing), extracting, using, transferring (providing, accessing), depersonalizing, blocking, deleting, destroying personal data.

We do not make your personal data available in public sources. We do not make decisions that give rise to legal consequences for you or otherwise affect your rights and legitimate interests on the basis of exclusively automated processing of personal data.

The Company records, systematizes, accumulates, stores, clarifies (updates, changes), extracts personal data of citizens of the Russian Federation using databases located in the Russian Federation.

### **For how long do we process the data?**

We process your personal data until we achieve the purpose of its processing. We keep your personal data:

- Until we receive your request to cease the data processing, destroy it, if the processed personal data is illegally obtained or is not necessary for the stated purpose of processing, unless there are other legal grounds for personal data processing as provided by the legislation of the Russian Federation;
- Or until the objectives of processing of such data are achieved;
- Or until the identification of unlawful processing of personal data, if it is impossible to ensure the lawfulness of processing.

After the expiration of the storage period, personal data is destroyed or blocked.

### **Do we use cookies?**

We suggest that you read the [Cookie Policy](#).

## **What are your rights?**

To ensure that your rights and freedoms are protected, at your request we will:

- Confirm whether we process your personal data and provide your personal data within 10 working days from the moment you or your representative request us; the said term may be extended by not more than 5 working days in case we send you a motivated notice specifying the reasons for extending the term of providing the requested information;
- Inform you of the source of your personal data that we process and its contents;
- Inform you of the legal grounds, purposes, terms and methods of processing your personal data, as well as measures aimed at ensuring the fulfillment of the Company's obligations in relation to your personal data as required by law;
- Clarify, whether we will block or destroy your personal data if your personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, and notify you of the measures taken;
- Inform you of any cross-border transfer of your personal data that has taken or is expected to take place;
- Inform you of the name and location of organizations that have access to your personal data and to which your personal data may be disclosed with your consent;
- Inform you of the name or surname, first name, patronymic and address of the persons to whom processing of your personal data may be assigned with your consent;
- Exclude you from the distribution of our newsletters at your request;
- Discontinue the processing of your personal data within 30 days from the date of withdrawal of consent, unless there are other legal grounds for processing personal data as provided by the laws of the Russian Federation.

## **How do we ensure the security of your data?**

In order to ensure the security of your personal data during its processing we take necessary and sufficient legal, organizational and technical measures provided by the Russian legislation.

In order to ensure adequate protection of your personal data we assess the efficiency of measures taken to ensure security of personal data, as well as determine the current security threats to your personal data during its processing in personal data information systems.

We detect unauthorized access to personal data and take measures, including measures to identify, prevent and eliminate consequences of computer attacks on information systems of personal data and response to computer incidents therein.

The Company has adopted local regulations on personal data security. The Company's employees who have access to personal data are familiar with this Policy and the local acts on personal data security.

## **Is the data available to third parties?**

The Website may transfer your personal data to third parties with your consent, unless there are other legal grounds for transfer your personal data to third parties as provided by the legislation of the Russian Federation.

### **Cross-border transfer of personal data**

We may transfer your personal data to foreign countries. Ensuring the security of your personal data in cross-border transfers is very important to us. We take all necessary measures to ensure the confidentiality and security of your personal data.

Cross-border transfer of personal data to foreign countries that do not provide adequate protection of personal data is possible only with your written consent, or to perform a contract under which you are a party, as well as in other cases prescribed by the laws of the Russian Federation on personal data.

### **Links to third-party websites**

The Website may contain links to third party websites and services over which we have no control. We are not responsible for the security and/or privacy of any information collected by any third-party websites and/or services.

### **Changes to this Policy**

We may update this Policy as needed. We encourage you to periodically check to make sure that this Policy is up to date. By continuing to use the Website after changes to the Policy, you agree to the changes.

### **How can you contact us?**

You can contact us with any questions about this Policy or a request regarding the processing of your personal data by sending us an email to: [privacy@selectel.ru](mailto:privacy@selectel.ru) or to: bldg. A, 21 Tsvetochnaya st., St. Petersburg, 196006.