

# REVATT RUS LLC POLICY ON THE PROCESSING OF PERSONAL DATA

## 1. Purpose and scope of the document

1.1. Policy of REWATT RUS LLC (OGRN 1197746500082, INN 7704498748, address: 121471, Moscow, Ryabinovaya str. 40, building 1, room. 1/1) (hereinafter also referred to as the "Company") related to the processing of personal data (hereinafter referred to as the "Policy") defines the concept and intentions of the Company in the field of processing and protection of personal data, in order to respect and protect the rights and freedoms of each person and, in particular, the right to privacy, personal and family secrets, protection of one's honor and good name.

1.2. The Policy is strictly implemented by the heads and employees of all divisions, branches and representative offices of the Company.

1.3. The Policy applies to all personal data of subjects processed in the Company using automation tools and without the use of such tools.

1.4. Any personal data subject has access to this Policy, including the use of the Internet.

1.5. The Company periodically updates this Policy and has the right to unilaterally change its terms at any time. The Company recommends regularly check the content of this Policy for possible changes. Unless otherwise provided by the Policy, all changes made to it will take effect from the date specified in the Policy.

1.6. In all other matters not provided for in this Policy, the Company is guided by the provisions of the current legislation of the Russian Federation.

## 2. Definitions

2.1. **Personal data** means any information related directly or indirectly to a specific or identifiable individual (personal data subject). Such information, in particular, may include: full name, year, month, date and place of birth, address, information about family, social and property status, information about education, profession, income, as well as other information that in its combination allows you to identify the personal data subject.

2.2. **Processing of personal data** means any action (operation) or a combination of actions (operations) performed both automatically and manually with personal data, including collection, recording, arrangement, accumulation, storage, specification (updating, modification), extraction, use, distribution (including transfer), anonymizing, blocking and destruction of personal data.

2.3. **Personal data subject** is an individual whose personal data is processed.

2.4. **Operator** is a person who independently or jointly with other persons arranges and (or) carries out the processing of personal data, as well as determines the purposes of processing personal data, the content of personal data to be processed, actions (operations) performed with personal data. For the purposes of this Policy, the Company, when processing personal data, is an operator, unless otherwise expressly stated in the Policy.

2.5. **Processor** is any person who, on the basis of an agreement with the operator, processes personal data on behalf of such operator, acting on behalf and (or) in the interests of the latter when processing personal data. The operator is responsible to the personal data subject for the actions or omissions of the processor. The processor is responsible to the operator.

2.6. Other terms are used in this Policy in accordance with the meanings defined by the current legislation of the Russian Federation, unless otherwise expressly stated in the Policy.

### **3. The procedure and conditions for processing personal data**

3.1. By personal data security, the Company means the protection of personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unlawful actions with respect to personal data, and takes the necessary legal, coordinating and technical measures to protect personal data.

3.2. Processing and ensuring the security of personal data in the Company is carried out in accordance with the requirements of the Constitution of the Russian Federation, Federal Law No. 152-FZ On Personal Data, by-laws, other laws of the Russian Federation defining the cases and features of personal data processing, as well as guidelines and methodological documents of the Government of the Russian Federation, the Ministry of Digital Development, Communications and Mass Media of the Russian Federation, the Federal Service for Supervision of Communications, Information Technology and Mass Media of the Russian Federation (Roskomnadzor), the Federal Service for Technical and Export Control of the Russian Federation and the Federal Security Service of the Russian Federation.

3.3. While processing personal data, the Company adheres to the following principles:

- legality and fairness;
- restrictions on the processing of personal data to achieve specific, predetermined and legitimate goals;
- preventing the processing of personal data that is incompatible with the purposes of personal data collection;
- preventing the consolidation of databases containing personal data, the processing of which is carried out for purposes incompatible with each other;
- compliance of the content and volume of the processed personal data with the stated purposes of processing;
- preventing redundancy of the processed personal data in relation to the stated purposes of processing;
- ensuring the accuracy of personal data, their sufficiency, and, if necessary, relevance to the purposes of personal data processing, as well as taking measures to delete or clarify incomplete or inaccurate data;
- transparency of personal data processing: the personal data subject may be provided with relevant information regarding the processing of his personal data;
- the storage of personal data in a form that allows you to identify the subject of personal data, no longer than the stated purposes of personal data processing require.

3.4. The Company processes personal data under the following conditions:

<b>Purpose of personal data processing</b>	<b>Types of personal data subjects</b>	<b>Categories and list of personal data</b>
To comply with and ensure the requirements of the current legislation of the Russian Federation;	• Users of the Company's website;	• Full name; • Contact information (phone number, fax number, e-mail address, postal address);

3.5. The Company processes personal data only if at least one of the conditions below is present during the following periods:

<b>The legal basis for the processing of personal data</b>	<b>The period of processing and storage of personal data</b>
With the consent of the personal data subject to the processing of his personal data	During the period for which consent was given to the processing of personal data
To achieve the goals provided for by an international treaty of the Russian Federation or a law, to carry out and fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation	Within the time limit established by the relevant international treaties or laws
If necessary, the processing of personal data that is subject to publication or mandatory disclosure in accordance with federal law	Within the time limit established by the relevant laws
For the execution of a judicial act, an act of another body or official that is subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings	During the period necessary for the execution of the relevant act
In connection with the participation of a person in constitutional, civil, administrative, criminal proceedings, proceedings in arbitration courts	During the period of participation in the relevant legal proceedings, including the time limits for appealing judicial acts, except in cases where a longer period for processing of personal data is established by the relevant laws of the Russian Federation
To protect the life, health or other vital interests of the personal data subject, if obtaining the consent of the personal data subject is impossible	Until the moment when obtaining the consent of the personal data subject becomes possible or when the relevant grounds threatening life, health or other vital interests disappear (depending on which circumstance comes first)
To exercise the rights and legitimate interests of the operator or third parties, provided that the rights and freedoms of the personal data subject are not violated	<p>During the period necessary to exercise rights and ensure legitimate interests</p> <p>The specific period is determined by the Company taking into account the provisions of this Policy, internal documents and local regulations of the Company, as well as the principles of personal data processing and the requirements of the current legislation of the Russian Federation, including the terms for termination of personal data processing when specific, predetermined and legitimate purposes of such processing are achieved</p>

3.6. The Company has the right to transfer the processing of personal data to third parties processors on the basis of contracts concluded with these persons. Such persons, in particular, include service providers who help the Company in its activities: hosting service providers, customer service contact center, etc.

Processors undertake to comply with the principles and rules of personal data processing provided for by the Federal Law No. 152-FZ On Personal Data including Art. 18.1 and Part 5 of Article 18, other laws and by-laws. For each processor, the contract will define:

- list of processed personal data;
- the purpose of processing;
- a list of actions (operations) that will be performed with personal data by the processor;
- obligations of the processor to respect confidentiality and ensure the security of personal data during processing, as well as a list of measures taken by the processor to ensure the protection of personal data processed by it, including the requirement to notify the Company about incidents with personal data;
- the obligation, at the request of the Company, to provide the Company with documents and other information confirming the adoption of measures and compliance with the requirements established by the Federal Law No. 152-FZ for the purpose of executing the Company's instruction during the period of validity of the instruction for the processing of personal data.

The processor is not obliged to obtain the consent of the personal data subject to the processing of his personal data. If, in order to process personal data on behalf of the Company, it is necessary to obtain the consent of the personal data subject, such consent is obtained directly by the Company.

3.7. In cases established by the legislation of the Russian Federation, the Company has the right to transfer personal data to third parties, including the situation of not giving an instruction to such persons to process personal data.

3.8. Unless otherwise provided by the legislation of the Russian Federation, the Company stops processing personal data (in relation to any of the above stated purposes) and destroys them in the following cases:

- Liquidation of the Company;
- reorganization of the Company, entailing the termination of its activities;
- the absence of legal grounds for processing personal data and/or achieving the goals of personal data processing.

The specific procedure for the destruction of personal data on media containing personal data, including external/removable electronic media, paper media and in personal data information systems, is determined by the Company in its internal documents and local regulations.

3.9. The Company may collect technical information when the user visits the websites or uses the Company's mobile applications and services. This includes information such as the IP address, the type of mobile device used, the operating system of the device and the type of browser, the unique identifier of the device, the address of the referring websites, the path that the user takes through the Company's websites and mobile applications, and so on. The Company may also use technologies such as cookies, web beacons and mobile device identifiers to collect information about the use of the Company's websites and mobile services. Cookies allow the Company to provide users with relevant information as they use the Company's websites and mobile services (for example, to open and download the relevant pages). Web beacons allow you to find out whether a certain page has been visited, whether an email has been opened, or whether advertisement banners of the Company's websites and other sites have been effective.

The Company uses this information to ensure the operability of its websites and mobile applications, to improve the quality of services provided, correct errors and improve the user experience in general. At the same time, the Company does not aim to identify a specific user of the Company's websites, mobile applications and services.

3.10. When processing personal data, the Company:

- takes measures necessary and sufficient to ensure compliance with the requirements of the legislation of the Russian Federation, internal documents and local regulations of the Company in the field of personal data;
- takes legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions in relation to personal data;
- appoints the person responsible for arranging the processing of personal data in the Company;
- issues internal documents defining the Company's policy regarding the processing of personal data, local acts on the processing of personal data, as well as local acts establishing procedures aimed at preventing and detecting violations of the legislation of the Russian Federation, eliminating the consequences of such violations;
- provides introduction of employees of the Company, its branches, representative offices and divisions directly engaged in the processing of personal data with the provisions of the legislation of the Russian Federation, internal documents and local regulations of the Company in the field of personal data, including requirements for the protection of personal data, and training of these employees;
- Conducts regular mandatory trainings for its employees on personal data issues;
- carries out internal control and (or) audit of compliance of personal data processing with the requirements of the legislation of the Russian Federation and regulatory legal acts adopted in accordance with it, other requirements for personal data protection, this Policy, internal documents and local regulations of the Company in the field of personal data;
- publishes or otherwise provides unrestricted access to this Policy;
- stops processing personal data and destroys it in cases provided for by the legislation of the Russian Federation;
- performs other actions provided for by the legislation of the Russian Federation in the field of personal data.

#### **4. Rights of the personal data subject**

The person whose personal data is processed by the Company has:

- the right to revoke the consent previously given to the processing of personal data;
- the right to receive information regarding the processing of personal data;
- the right to demand clarification of its personal data, blocking or destruction if the personal data is incomplete, outdated, unreliable, illegally obtained, is not necessary for the stated purpose of processing, as well as to demand the termination of personal data processing if the purpose of such processing is achieved by the Company.

\* According to Part 2 of Article 9, Parts 4 and 5 of Article 21 of the Federal Law On Personal Data, the Company has the right to continue processing personal data if there are other legal grounds.

If a different procedure for interaction between the Company and the subject of personal data is not provided for by the relevant document between them (for example, an agreement or a written consent to the processing of personal data), in order to exercise these rights, the subject of personal data must send an application to the Company:

- in writing and signed with a handwritten signature to the address: 121471, Moscow, PO box 1; or
- in the form of an electronic document and signed with an electronic signature by e-mail: [info@rewatt.tech](mailto:info@rewatt.tech).

Such a statement must necessarily contain a description of the requirements of the personal data subject, as well as the following information:

- Full name of the personal data subject;
- the number of the main document certifying the identity of the personal data subject or his representative, information about the date of issue of the specified document and the issuing authority, OR other data that uniquely identifies the personal data subject;
- information confirming the personal data subject's participation in relations with the Company, OR information otherwise confirming the fact of the personal data processing by the Company;
- signature of the personal data subject or his representative.

The personal data subject also has the right to appeal the actions (inaction) and decisions of the Company that violate his rights in the processing of personal data to the authorized body for the protection of the rights of personal data subjects (Roskomnadzor) and to the court in accordance with the procedure established by the legislation of the Russian Federation.

## **5. Information on the implemented requirements for the protection of personal data**

When processing personal data, the Company takes the necessary legal, coordinating and technical measures to protect personal data from unauthorized or accidental access to it, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions in relation to personal data. The Company regularly reviews and updates the measures taken to ensure the best protection of the processed personal data, such measures are described in this Policy, internal documents and local regulations of the Company.

Such measures include, in particular:

- development of threat models;
- identification of threats to the security of personal data during their processing in personal data information systems;
- application of coordinating and technical measures to ensure the security of personal data during its processing in personal data information systems necessary to meet the requirements for personal data protection, the implementation of which ensures the levels of personal data protection established by the Government of the Russian Federation;
- the use of information security tools that have passed the compliance assessment procedure in accordance with the established procedure;
- assessment of the effectiveness of measures taken to ensure the security of personal data before the commissioning of the personal data information system;

- detection of unauthorized access to personal data and taking measures;
- recovery of personal data modified or destroyed due to unauthorized access;
- establishment of 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;
- accounting for machine-based personal data storage media;
- organization of access and intra-facility regimes on the territory of the Company;
- placement of technical means for processing of personal data within the protected area;
- maintenance of security and alarm equipment in constant readiness;
- monitoring user actions, conducting proceedings on violations of personal data security requirements.