

PERSONAL DATA PROCESSING POLICY

What is this document about?

This Personal Data Processing Policy (hereinafter – the "Policy" and "Personal Data", respectively) has been developed in accordance with the Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006 (hereinafter – the "Law") and applies to all Personal Data that LLC "AISIU+" INN 7813615927, OGRN 1187847204984 (hereinafter – "ICU") may receive from the data subject while using the website owned and/or administered by ICU, located at: <https://icu.agency/> and all its subdomains (hereinafter – the "Website"), or when visiting ICU's official social media pages on VKontakte: <https://vk.com/icu.russia> and Telegram: <https://t.me/icurussia>, <https://t.me/icuagencychat>, <https://t.me/sprntru> (hereinafter – the "Social Media"), by filling out contact forms or through other forms of interaction. The Policy also defines the principles of personal data processing applied by ICU. This Policy is an officially approved internal document of ICU.

Where does the Policy apply?

This Policy applies to all processes involving the collection, recording, systematization, accumulation, storage, clarification, extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction of Personal Data, carried out both with and without the use of automation tools.

ICU ensures the protection of processed Personal Data from unauthorized access by third parties, disclosure, unlawful use, or loss, in accordance with the requirements of Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006.

The Policy applies directly to ICU's business operations, to the Website or Social Media owned and/or administered by ICU, as well as to any other situations where ICU is required to process Personal Data of third parties obtained via the Internet.

Personal Data (hereinafter – "Personal Data") is provided by the User (and/or hereinafter – the "Data Subject") when using the Website and/or ICU Social Media and may include the following information:

- Full name;
- Contact details (email or phone number);
- Education;
- Profession;
- Place of work;
- Image.

Technical information (hereinafter – "Cookies"), automatically collected by the Website software during the User's visit to the Website, includes:

- IP address;
- Browser information;
- Device type (mobile or PC);
- OS type and version;
- Sources of entry to the Website;
- Date and time of access, location data;
- Pages visited and activity on them, pages requested.

Use of the Website and/or Social Media, and the provision of consent to the processing of Personal Data by the User (by ticking the checkbox to indicate agreement and

acknowledgment of this Policy) constitutes acknowledgment and unconditional agreement by the User to this Policy and the terms of Personal Data processing outlined herein. In case of disagreement with these terms, the User agrees to cease use of the Website and/or Social Media.

What terms are used in this Policy?

This Policy uses terms established by the Federal Law "On Personal Data," as well as other generally accepted terms that may be applicable to this Policy.

What principles guide the processing of Personal Data?

In its personal data processing activities, ICU is guided by the following principles:

- The processing of Personal Data is limited to achieving specific, predetermined purposes as set forth by law, this Policy, and the data subject's consent to processing. ICU does not permit processing of Personal Data that is incompatible with the stated purposes of collection.
- ICU does not allow the merging of databases containing Personal Data that are processed for purposes that are incompatible with one another.
- ICU processes only those Personal Data that correspond to the stated purposes of their processing.
- The content and scope of processed Personal Data correspond to the stated purposes of processing. The processed Personal Data are not excessive in relation to those purposes.
- The accuracy of Personal Data, their sufficiency, and, where necessary, their relevance to the purposes of processing are ensured. ICU takes necessary measures to delete or update incomplete or inaccurate Personal Data.
- ICU stores Personal Data in a form that makes it possible to identify the data subject, for no longer than necessary for the purposes of processing, unless a longer retention period is required by federal law or a contract to which the data subject is a party, beneficiary, or guarantor.
- ICU destroys or depersonalizes Personal Data once the purposes of processing have been achieved or when such processing is no longer necessary, unless otherwise required by law.

What grounds justify the processing of Personal Data?

ICU processes Personal Data exclusively under one of the following legal grounds:

1. With the consent of the Personal Data subject;
2. In cases where the processing of Personal Data is necessary for:
 - Achieving the goals set by an international treaty of the Russian Federation or by law, as well as performing functions, powers, and duties imposed on ICU by Russian legislation;
 - The administration of justice, enforcement of a court decision, or an act issued by another authority or official that is subject to enforcement under the laws of the Russian Federation on enforcement proceedings;
 - The execution of a contract to which the Personal Data subject is a party (as a beneficiary or guarantor), as well as for entering into a contract initiated by the Personal Data subject or one under which the Personal Data subject will be a beneficiary or guarantor;
 - The realization of ICU's rights and legitimate interests or the rights and legitimate interests of third parties, provided that such processing does not violate the rights and freedoms of the Personal Data subject.

What is the list and purpose of processing Personal Data?

1. Purpose: Reviewing and accounting for any inquiries from Data Subjects to ICU; receiving proposals from individuals (Data Subjects), acting as representatives of legal entities or sole proprietors, regarding any matter of interaction with ICU, including proposals related to potential, ongoing, or completed cooperation with ICU on matters related to ICU's work/services; informing Data Subjects about the results of requests

reviewed and about the availability of corresponding implementation opportunities within ICU, as well as reviewing and accounting for any other inquiries addressed by Data Subjects to ICU.

List of Personal Data (classified as general and not special and/or biometric): last name, first name, patronymic, contact phone numbers, email addresses, as well as any other data provided by the Data Subject to ICU via the Website or Social Networks and/or other means of communication published by ICU on the Website or in Social Networks, for the purpose of processing Personal Data as defined in this clause of the Policy.

2. Purpose: Receiving and reviewing resumes sent by Data Subjects, accepting proposals from Data Subjects for inclusion in ICU's pool of potential employees. Contacting Data Subjects regarding ICU job openings; informing Data Subjects of the results of resume reviews and the availability of vacancies at ICU, informing Data Subjects of job openings via email, and interacting with individuals (Data Subjects) representing legal entities or sole proprietors on any matters of cooperation with ICU.

List of Personal Data (classified as general and not special and/or biometric): last name, first name, patronymic, contact phone numbers, email addresses, field of activity, personal data included in the resume (including information on education, previous work experience), name of the Data Subject's social media profile, as well as any other data provided by the Data Subject to ICU via the Website and/or other means of communication published by ICU on the Website, for the purpose of processing Personal Data as defined in this clause of the Policy.

3. Purpose: Sending promotional and informational messages to Data Subjects in the form of newsletters.

List of Personal Data (classified as general and not special and/or biometric): email addresses.

4. Purpose: Configuring the Website in accordance with User needs, providing personalized recommendations and curated content, and conducting marketing analysis of Website Users.

List of Personal Data (classified as general and not special and/or biometric):

4.1. Yandex.Metrica: Cookies, email addresses.

4.2. Yandex.Audience: contact phone numbers, email addresses.

4.3. Notisend: last name, first name, patronymic, contact phone numbers, email addresses.

4.4. Bitrix24: last name, first name, patronymic, email address, contact phone number.

5. Purpose: Providing Data Subjects with the ability to use the chatbot on the Telegram messenger, available at: https://t.me/icu_agency_bot (hereinafter referred to as the "Chatbot"), namely:

5.1. Reviewing and accounting for any inquiries from Data Subjects to ICU; receiving proposals from individuals (Data Subjects), acting as representatives of legal entities or sole proprietors, regarding any matter of interaction with ICU, including proposals related to potential, ongoing, or completed cooperation with ICU on matters related to ICU's work/services; informing Data Subjects about the results of requests reviewed and about the availability of corresponding implementation opportunities within ICU, as well as reviewing and accounting for any other inquiries addressed by Data Subjects to ICU.

List of Personal Data (classified as general and not special and/or biometric): last name, first name, patronymic, contact phone numbers, email addresses, as well as any other data provided by the Data Subject to ICU via the Website or Social Networks and/or other means of communication published by ICU on the Website or in Social Networks, for the purpose of processing Personal Data as defined in this clause of the Policy.

5.2. Participation of Data Subjects in a section tentatively titled "Subscriber Question" by submitting questions via the Chatbot and receiving answers from ICU experts, published in the Telegram channel "ICU" (hereinafter referred to as the "ICU Channel"), available at: <https://t.me/icurussia>.

List of Personal Data (classified as general and not special and/or biometric): last name, first name, patronymic, contact phone numbers, email addresses, education, profession, place of employment, image, as well as any other data provided by the Data Subject to ICU via the Chatbot for the purpose of processing Personal Data as defined in this clause of the Policy.

5.3. Data analysis and improvement of the Chatbot's performance, customization of the Chatbot in accordance with the needs of Data Subjects, and conducting marketing analysis of Data Subject behavior.

List of Personal Data (classified as general and not special and/or biometric): Cookies, as well as any other data provided by the Data Subject to ICU via the Chatbot for the purpose of processing Personal Data as defined in this clause of the Policy.

The specific list of Personal Data, purposes, and processing conditions shall be defined in the consents to the processing of Personal Data. These consents must not contradict this Policy or applicable Law. Each consent issued on behalf of ICU constitutes an integral part of this Policy. ICU does not collect or process special categories of Personal Data relating to race, nationality, political views, religious or philosophical beliefs, health status, or sex life of the Data Subject.

What are the conditions for the processing of Personal Data?

The Website and Social Networks store the Personal Data of the Data Subject in accordance with the internal regulations of the specific services.

The confidentiality of the Data Subject's Personal Data is preserved, except in cases where the Data Subject voluntarily provides information about themselves for public access to an unlimited number of persons, including when the Data Subject provides ICU with consent to the processing of Personal Data that is authorized for dissemination.

How is Personal Data processed?

When processing Personal Data, ICU may perform the following actions either separately or in combination, using automation tools or without such tools: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, usage, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction. The processing of the provided Personal Data may be carried out using automated and/or non-automated means, including through the use of internet services such as Yandex.Metrica and Yandex.Audience.

At the same time, ICU does not carry out the processing of Personal Data exclusively through automated means, nor does it process special categories of Personal Data or biometric Personal Data. ICU is also entitled to carry out cross-border transfer of Personal Data for the purposes defined in this Policy, subject to full compliance with the applicable legislation of the Russian Federation regarding such transfers.

Furthermore, ICU is entitled, at its discretion, to transfer the user's Personal Data to its contractors for the purpose of fulfilling obligations under contracts with such contractors and complying with applicable legislation, but always exclusively for achieving the purposes set out in the Consent to Personal Data Processing and in this Policy.

ICU may also transfer the Data Subject's personal information to third parties in the following cases:

- The Data Subject has given consent for such actions;
- The transfer is necessary for the use of a specific service by the Data Subject or for the fulfillment of a specific agreement or contract with the Data Subject;
- The transfer is provided for by Russian or other applicable legislation within the procedures established by law.

What are the retention periods and requirements for the destruction of Personal Data?

ICU retains your data only as long as necessary to achieve the above-mentioned purposes or as long as required by the legislation of the Russian Federation. After that, your Personal Data will be destroyed.

The specific retention periods for Personal Data depend on the type of data processed and are indicated in the corresponding consent to the processing of Personal Data.

The processed Personal Data shall, in any case, be subject to destruction when:

- The purposes of their processing have been achieved or the need to achieve these purposes has been lost;

- A relevant request is received from the Data Subject in accordance with the procedure established by law;
- A lawful demand is received from an authorized body;
- The established retention periods for Personal Data have expired.

The destruction of Personal Data is carried out by deleting it from the Company's servers or removing it from the information systems used.

What measures are taken by ICU to ensure the protection of Personal Data?

Measures to protect Personal Data at ICU include:

- Appointment of employees responsible for the processing of Personal Data, their training and instruction, and internal monitoring of ICU employees' compliance with data protection requirements;
- Development and continuous updating of the Personal Data Processing Policy;
- Establishment of rules for access to Personal Data and ensuring registration and accounting of all actions performed with Personal Data;
- Observance of conditions that ensure the security of Personal Data and prevent unauthorized access;
- Detection of unauthorized access to Personal Data and response measures;
- Internal control procedures.

What rights do Data Subjects have?

ICU guarantees the rights of Data Subjects as defined by the Law and this Policy. The Data Subject has the right to obtain comprehensive information regarding the processing and protection of their Personal Data, to request clarification of their Personal Data, its blocking or destruction in cases where the data is incomplete, outdated, inaccurate, unlawfully obtained, or not required for the stated purposes of processing, as well as to request the cessation of the processing of their Personal Data in cases provided for by the Law, by sending an official request with the subject line "REVOCATION OF CONSENT TO THE PROCESSING OF PERSONAL DATA" to the email address: hello@icu.agency.

Upon receiving a request from the Data Subject to revoke consent to the processing of Personal Data, ICU shall stop the processing of the Data Subject's Personal Data within a period not exceeding 10 (ten) business days from the date of receipt of the request.

Additional Provisions

ICU reserves the right to make changes to this Policy without the consent of the Data Subject.

The new Policy enters into force upon its publication on the Website, unless otherwise provided by the new version of the Policy.

The current version of the Policy is available at:

https://icu.agency/docs/personal_data_processing_policy.pdf

If you have any questions regarding the Personal Data processed by ICU, please contact us at hello@icu.agency