

Privacy Policy of "Trilain" LLC Regarding Personal Data Processing

****1. General Provisions****

1.1. The Privacy Policy of "Trilain" Limited Liability Company (hereinafter referred to as the "Operator") regarding the processing of personal data (hereinafter referred to as the "Policy") is developed to ensure the protection of the rights and freedoms of personal data subjects during the processing of their personal data, including the protection of privacy rights, personal and family secrets.

1.2. Key terms used in the Policy:

- ****Personal Data****: Any information relating to a directly or indirectly identified or identifiable individual (personal data subject).
- ****Processing of Personal Data****: Any action (operation) or set of actions (operations) performed with personal data, whether automated or not. This includes:
 - Collection;
 - Recording;
 - Systematization;
 - Accumulation;
 - Storage;
 - Updating or modification;
 - Retrieval;
 - Use;
 - Transfer (distribution, provision, access);
 - Deletion;
 - Destruction.
- ****Automated Processing of Personal Data****: Processing of personal data using computer technology.
- ****Dissemination of Personal Data****: Actions aimed at disclosing personal data to an indefinite circle of persons.
- ****Provision of Personal Data****: Actions aimed at disclosing personal data to a specific person or a specific circle of persons.
- ****Destruction of Personal Data****: Actions resulting in the impossibility of restoring the content of personal data in the personal data information system and/or the destruction of physical media containing personal data.
- ****Personal Data Operator (Operator)****: A state body, municipal authority, legal entity, or individual organizing and/or performing the processing of personal data, as well as determining the purposes of processing, the composition of personal data to be processed, and the actions (operations) performed with personal data.

1.3. The Operator, having access to personal data, is obliged to maintain the confidentiality of personal data—not to disclose or distribute personal data to third parties without the consent of the personal data subject, unless otherwise provided by Federal Law No. 152-FZ "On Personal Data" (hereinafter referred to as the "Federal Law").

1.4. The personal data subject has the right to obtain information regarding the processing of their personal data, including:

- 1) Confirmation of the processing of their personal data by the Operator;
- 2) Legal grounds and purposes of processing personal data;
- 3) Methods of processing personal data used by the Operator;
- 4) Name and location of the Operator, information about persons (except for the Operator's employees) who have access to personal data or to whom personal data may be disclosed under an agreement with the Operator or under the Federal Law;
- 5) Processed personal data related to the respective personal data subject, the source of such data, unless another procedure for providing such data is established by the Federal Law;
- 6) Processing periods for personal data, including storage periods;
- 7) Procedure for exercising the rights of the personal data subject under the Federal Law;
- 8) Information about completed or intended cross-border data transfers;
- 9) Name or surname, first name, patronymic, and address of the person processing personal data on behalf of the Operator, if such processing is or will be entrusted to them;
- 9.1) Information about how the Operator fulfills the obligations established by Article 18.1 of the Federal Law;
- 10) Other information provided by the Federal Law "On Personal Data" or other federal laws.

1.5. The personal data subject has the right to request the Operator to clarify, block, or destroy their personal data if the data is incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the stated processing purposes, as well as to take legal measures to protect their rights.

1.6. The personal data subject has the right to protect their rights and legitimate interests, including compensation for damages and/or moral harm through legal proceedings.

1.7. The Operator has the right to:

- Defend its interests in court;
- Provide personal data to third parties if required by applicable law (tax authorities, law enforcement, etc.);
- Refuse to provide personal data in cases stipulated by law;
- Process personal data without the subject's consent in cases provided by law.

1.8. When collecting personal data, the Operator is obliged to provide the personal data subject, upon request, with the information specified in Part 7 of Article 14 of the Federal Law "On Personal Data."

1.9. When collecting personal data, including via the Internet, the Operator must ensure the recording, systematization, accumulation, storage, updating, and retrieval of personal data of Russian citizens using databases located in Russia, except for cases specified in clauses 2, 3, 4, and 8 of Part 1 of Article 6 of the Federal Law "On Personal Data."

****2. Purposes of Personal Data Collection****

2.1. Processing of personal data is limited to achieving specific, predetermined, and lawful purposes. Processing of personal data incompatible with the purposes of collection is prohibited.

2.3. The Operator's purposes for processing personal data include:

- Conclusion, execution, and termination of civil contracts;
- Organization of personnel records, compliance with laws, conclusion, and execution of obligations under labor and civil contracts;
- Personnel record-keeping, assistance to employees in employment, training, career advancement, and benefits;
- Compliance with tax legislation regarding personal income tax, contributions to extra-budgetary funds, and pension legislation when forming and transferring personalized data to the Pension Fund;
- Completion of primary statistical documentation in accordance with labor, tax, and other federal laws.

****3. Legal Grounds for Processing Personal Data****

3.1. The legal grounds for processing personal data include:

- Legal acts under which the Operator processes personal data: the Constitution of the Russian Federation; Articles 86–90 of the Labor Code of the Russian Federation;
- The Operator's statutory documents;
- Agreements between the Operator and the personal data subject;
- Consent to the processing of personal data (in cases not directly provided by Russian law but within the Operator's authority).

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

4.1. The content and scope of processed personal data correspond to the stated processing purposes. Processed personal data must not be excessive relative to these purposes.

4.2. Processing of personal data is permitted in the following cases:

- The personal data subject has consented to the processing;
- Processing is necessary for the performance of a contract to which the subject is a party or beneficiary.

4.3. Categories of personal data subjects include:

4.3.1. ****Employees of the Operator, former employees, job candidates****:

- Name, gender, citizenship, nationality, date and place of birth, address, contact details, job position, employment history, tax identification number, passport details, education, marital status, etc.

4.3.2. ****Clients and contractors (individuals)****:

- Name, gender, citizenship, date and place of birth, address, contact details, job position, tax identification number, passport details, bank account number.

4.3.3. ****Representatives/employees of clients and contractors (legal entities)****:

- Name, gender, contact details, job position, passport details.

****5. Procedure and Conditions for Processing Personal Data****

5.1. The Operator processes personal data through automated or non-automated means, including collection, recording, storage, updating, use, transfer, deletion, and destruction.

5.2. Processing is conducted in compliance with the principles and rules of the Federal Law "On Personal Data."

5.3. Processing is limited to specific, predetermined, and lawful purposes. Only data relevant to these purposes is processed.

5.4. Personal data is stored in a form that allows identification of the subject no longer than necessary, unless a longer period is required by law or contract.

5.5. Storage of personal data is conducted using databases located in Russia. Non-automated processing requires physical separation of personal data from other information.

5.6. Processing ceases upon achieving its purposes, expiration or withdrawal of consent, or detection of unlawful processing.

5.7. The Operator and other parties with access to personal data must not disclose or distribute it without consent, unless otherwise provided by law.

5.8. The Operator takes necessary measures to comply with the Federal Law "On Personal Data."

5.9. The Operator implements legal, organizational, and technical measures to protect personal data from unauthorized access, destruction, alteration, or other unlawful actions.

****6. Updating, Correction, Deletion, and Destruction of Personal Data; Responses to Access Requests****

6.1. The Operator must inform the personal data subject about the existence of their data and provide access within 30 days of receiving a request.

6.2. The Operator must allow free access to personal data and correct inaccuracies within seven working days. Unlawfully obtained or unnecessary data must be destroyed within the same period.

6.3. If inaccuracies are confirmed, the Operator must correct the data and remove any blocks within seven working days.

6.4. The Operator must cease processing personal data:

- Upon detecting unlawful processing (within three working days);
- Upon withdrawal of consent by the subject;
- Upon achieving the processing purposes (data must be destroyed within 30 days).

This document is an English translation of the original Russian Privacy Policy of "Trilain" LLC. In case of discrepancies, the original Russian version shall prevail.