

Limited Liability Company  
"CVLOGRUS"  
("CVLOGRUS" LLC)

**REGULATION No. 2 dated  
25.10.2022  
To Order No. PD-1 dated  
25.10.2022**

on the processing of personal data of  
clients, counterparties and  
"CVLOGRUS" LLC website users

Moscow

## **1. General Provisions**

1.1. Regulation on the processing of personal data of clients, counterparties and users of "CVLOGRUS" LLC website (hereinafter referred to as Regulation) is developed in accordance with the Constitution, the Labor Code, the Federal Law No. 152-FZ dated 27.07.2006, the Federal Law No. 519-FZ dated 30.12.2020, the Federal Law No. 63-FZ dated 06.04.2011 "On electronic signature" and other laws and regulations in force in Russia.

1.1.1. The Regulation also takes into account, where applicable, sections of other laws applicable to "CVLOGRUS" LLC in the field of personal data processing, such as the European General Data Protection Regulation ("GDPR") or local laws in certain countries to the extent not in conflict with the 152-FZ.

1.1.2. In individual cases of personal data processing in order to resolve possible conflicts between the laws of certain countries, the procedure and principles of personal data processing in "CVLOGRUS" LLC may be additionally regulated and detailed in special sections of "CVLOGRUS" LLC documents (e.g. contracts, agreements) relating to such individual cases and serving for such cases as Data Processing Agreements (DPA) in the GDPR terminology.

1.2. This Regulation establishes the procedure for collecting, recording, processing, accumulating, using, distributing and storing personal data on personal data subjects and assurances of confidentiality towards individuals: clients and/or representatives of client companies, counterparties and/or representatives of counterparty companies and "CVLOGRUS" LLC website users, who have provided "CVLOGRUS" LLC with their personal data.

1.3. The purpose hereof is to protect the personal data of clients, counterparties and users of the "CVLOGRUS" LLC website from unauthorized access and disclosure. The personal data of the above persons is confidential, strictly protected information.

1.4. For the purposes hereof, personal data shall mean any information directly or indirectly relating to the personal data subject.

1.4.1. This Regulation shall not apply to other websites and shall not apply to third party websites. “CVLOGRUS” LLC shall not be responsible for any third party websites to which users may link from the website.

1.5. The documents that contain the personal data of personal data subjects are as follows:

- contracts and other agreements for the provision of services / performance of work by “CVLOGRUS” LLC;
- civil contracts for the provision of services by “CVLOGRUS” LLC;
- information from the feedback forms on the official website of “CVLOGRUS” LLC or the email newsletter of “CVLOGRUS” LLC.

1.6. This Regulation and amendments thereto shall be approved by the Director General of “CVLOGRUS” LLC and shall be enforced by an order. This Regulation shall be posted on the official website of “CVLOGRUS” LLC at <https://cvlogrus.com>, and shall be freely accessible. All users of the website have access to this Regulation.

1.6.1. The web forms, forms, templates of “CVLOGRUS” LLC for the collection of personal data shall contain mandatory notices to users about the processing of personal data in accordance with the Regulation by reference thereto.

1.7. The Regulation shall be valid without limit of time after approval and until it is replaced by a new version. “CVLOGRUS” LLC shall have the right to amend the Regulations without notice to any persons. The Regulation shall be reviewed annually to keep it up to date and shall be updated where necessary.

1.8. “CVLOGRUS” LLC, engaged in processing personal data of citizens of the Russian Federation, each separately registered in the register of the Authorized Body of the Russian Federation for the Protection of the Rights of Personal Data Subjects (hereinafter referred to as Roskomnadzor) as personal data controllers. Information about the controller can be accessed by anyone via the Internet by searching the registry at <https://pd.rkn.gov.ru/operators-registry/operators-list/> .

The register shall contain information on the controller as prescribed by the laws of the Russian Federation in relation to the relevant company, including:

- full name and location of the personal data controller;
- information on the persons in charge of organizing the processing of personal data;
- contact details for enquiries;
- information about the location of databases of personal data information systems;
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- information on the processing of personal data and security measures;
- information on the cross-border transfer of personal data;
- other information about the personal data controller as provided by the 152-FZ.

1.9. This Regulation shall come into force on 25.10.2022.

## **2. Receipt and processing of personal data**

2.1. “CVLOGRUS” LLC receives personal data directly from customers, contractors or website users. The Company may obtain personal data from third parties only with the written consent of the personal data subject or in other cases expressly provided for in the law.

2.1.1. The main categories of personal data subjects whose data is processed at “CVLOGRUS” LLC include:

- visitors and users of “CVLOGRUS” LLC websites, applications and information resources;
- individuals who are or have been in an employment or civil law relationship with “CVLOGRUS” LLC, their close relatives, references as well as persons who intend to enter into such a relationship, e.g. candidates for vacant positions;
- individuals who are or have been in an employment or civil law relationship with the counterparties of “CVLOGRUS” LLC, as well as individuals who intend to enter into such a relationship;
- individuals undergoing internships, practical training from educational institutions at “CVLOGRUS” LLC;
- individuals listed in various public registers, databases, publicly available and other sources that have been obtained in a lawful manner and used in the provision of services and in the products of “CVLOGRUS” LLC as data sources;
- individuals who have made enquiries, reports, statements, complaints, suggestions to “CVLOGRUS” LLC using contact information or means of collecting feedback;
- individuals participating in interviews, surveys, analytical and marketing research on the activities of “CVLOGRUS” LLC;
- participants in events organized by “CVLOGRUS” LLC or partner organizations;
- visitors to the offices of “CVLOGRUS” LLC;
- founders of the company.

2.2. The Company must inform the personal data subject of the purpose, intended sources and means of obtaining personal data, as well as the nature of the personal data to be obtained and the consequences of refusing to give written consent to obtain it.

2.2.1. For the above categories of subjects the following information may be processed in accordance with the processing purpose:

- personal information (surname, first name, patronymic, including former ones; sex; year, month, date of birth; age; place of birth, nationality, citizenship);
- contact information (postal address, telephone numbers, e-mail addresses, pseudonyms, identifiers in social networks and communication services); addresses of registration and actual residence;
- information on identity documents; driving license; information on the subject's identification numbers in state accounting systems (e.g. INN, SNILS, etc.); information on compulsory and voluntary health insurance policies;
- professional activities (place of work; position; subdivision; job number; length of service; ownership interest in a legal entity ; authority);
- skills and qualifications (education acquired; profession; qualifications awarded; foreign language skills; completed training courses, internships and practical training);

- family information (marital status; family composition; legal representatives, next of kin);
- social status; property status; information on means of transport;
- information on contracts and agreements and their statuses; information on participation in partner and bonus programs; referral promo codes; information on products and services used;
- recommendations and feedback; information on staff rating;
- financial status; payment details; income; information on tax and other contributions to public funds; information on accruals and deductions, other forms of remuneration; information on purchases, orders for goods and services made; information on payments;
- information on the presence in selected public registers, databases and lists;
- military service details; information on the migration register;
- photo and video images; voice information (voice recording);
- electronic user data (user IDs, network addresses, cookies, device IDs, screen sizes and resolutions, hardware and software information such as browsers, operating systems, installed applications, geolocation, language settings, time zone, time and statistics of using applications and information resources of “CVLOGRUS” LLC, user actions in services, sources of hits to web pages, search and other queries sent, user-generated content); electronic signature certificates;
- hobbies and interests; personal interests; tastes and preferences; subscriptions to newsletters;
- health status; information on disability, incapacity for work;
- information on awards, honors, penalties and prosecutions;
- other information required by the forms, procedures and processing purposes .

2.3. The Company shall not require the personal data subject to submit personal data that would be excessive for the processing purposes which the Company is committed to.

2.4. The personal data subject shall provide the Company with accurate information about himself or herself. When processing personal data, the accuracy of the personal data, its sufficiency and relevance in relation to the purposes of personal data processing shall be ensured.

If inaccurate or incomplete personal data is found, it may be corrected and updated.

In cases where the updating of personal data is beyond the area of responsibility of “CVLOGRUS” LLC, processing may be suspended until the updating is completed.

Duties and responsibilities for the timely updating of personal data in individual processing cases may be established by agreements or local acts of “CVLOGRUS” LLC.

2.5. In order to process the personal data of personal data subjects, the Company shall obtain each subject's consent to the processing of their personal data. The Company shall obtain such consent if the Company is not authorized by law to process personal data without consent.

2.6. The consent to the processing of personal data may be withdrawn by the data subject at any time. A written notice of withdrawal of consent must be sent to the Company for this purpose. In case of withdrawal of consent to process personal data, the Company shall be entitled to continue processing personal data without consent on the grounds specified in Clauses 2-11 of Part 1 of Article 6, Part 2 of Article 10 and Part 2 of Article 11 of Federal Law No. 152-FZ dated 27.07.2006, as well as in case of other agreement with the personal data subject.

2.7. Personal data processing operations includes: collection; recording; systematization; accumulation; storage; clarification (updating, modification); retrieval; use; transmission (dissemination, provision, access); depersonalization; blocking; deletion, destruction.

2.8. In cases of processing not stipulated by applicable law or an agreement with the data subject, the processing shall be carried out after obtaining the consent of the data subject. A mandatory case of prior consent shall be, for example, contact with a potential customer for marketing purposes when promoting goods, software products, works and services of “CVLOGRUS” LLC on the market.

2.9. Consent may be expressed in the form of implicative actions taken by the personal data subject, among which are as follows:

2.9.1. accepting the terms and conditions of the offer agreement, license agreement, rules of using information resources and products of “CVLOGRUS” LLC;

2.9.2. continuing to use applications, services, information resources, websites of “CVLOGRUS” LLC, interaction with their user interfaces after notifying the user of data processing;

2.9.3. granting the necessary permissions to the mobile app when requested at the time of installation or use;

2.9.4. marking and filling in the relevant fields on the forms;

2.9.5. maintaining electronic correspondence referring to the processing;

2.9.6. entering the area after reading the warning signs and symbols;

2.9.7. other acts performed by the subject from which his or her will can be deduced.

2.10. In certain cases provided for in the laws of the Russian Federation, the consent shall be made in writing, specifying the information provided for in the 152-FZ, as well as in accordance with other applicable requirements and templates.

2.11. In cases where personal data is processed not directly from the data subject, but from other persons on the basis of an agreement or a request for processing, the obligation to obtain the consent of the data subject may be imposed on the person from whom the personal data is obtained.

2.12. If a data subject refuses to provide sufficient personal data, “CVLOGRUS” LLC will not be able to carry out the necessary actions to achieve the relevant processing objectives. For example, in such a case the user registration in a software product may not be completed, contractual services may not be rendered, work may not be performed, goods may not be delivered, a job applicant's CV will not be considered, etc.

### **3. Storage of personal data**

3.1. “CVLOGRUS” LLC ensures the protection of personal data of personal data subjects against unauthorized use or loss.

3.2. Personal data on personal data subjects shall be stored electronically on a local computer network. Access to electronic databases containing personal data on personal data subjects shall be ensured by a two-stage password system: at the local computer network level and at the database level. Passwords shall be set by the CEO of “CVLOGRUS” LLC and shall be

communicated individually to employees who have access to the personal data of the personal data subjects.

3.3. Passwords shall be changed by the General Director of “CVLOGRUS” LLC at least once every six months.

3.4. Access to personal data shall be granted to the General Director of “CVLOGRUS” LLC and persons appointed by the Order of the General Director of the Company. Access to personal data by specialists from other departments shall be granted on the basis of a written permission from the General Director of “CVLOGRUS” LLC.

3.5. Copying and extracting from personal data of personal data subjects shall be allowed only for business purposes with the written consent of the General Director of “CVLOGRUS” LLC.

#### **4. Use of personal data**

4.1. Personal data may be used for purposes associated with the interaction between the data subject and the Company: entering into a contract, exchanging letters, subscribing to the Company's mailing list, receiving services from the Company.

4.2. Personal data provided by the data subject shall be processed by automated and non-automated means. Personal data shall be kept for as long as necessary to achieve the purposes for which it is processed.

4.3. After the expiry of the statutory storage period of documents that contain personal data on personal data subjects, the documents must be destroyed. For this purpose, the Company shall set up an expert committee and conduct an examination of the value of the documents. In the course of the examination, the commission selects files with expired storage period and, based on the results of the selection, issues an act on the allocation for destruction of files that are not subject to storage. The documents are then destroyed in the shredder. Personal data in electronic form shall be erased from data carriers, or the data carriers on which the information is stored shall be physically destroyed.

4.4. “CVLOGRUS” LLC may engage third parties to process personal data as subcontractors, if necessary, provided that the processing principles are observed and that a relevant contract or agreement is in place with them.

Such cases include, for example, the following:

4.4.1. provision of software products, goods, works and services by “CVLOGRUS” LLC together with third parties, technological and other partners of “CVLOGRUS” LLC;

4.4.2. organization of a partner network of “CVLOGRUS” LLC for the distribution of software products, goods, works and services in the market;

4.4.3. use of third-party services, computing resources, applications and infrastructure for information processing, communication with users of software products, works and services, and purchasers of goods.

4.5. Processing of personal data on the basis of contracts and other agreements of “CVLOGRUS” LLC, orders for processing of personal data shall be performed in accordance with the terms of these contracts, agreements of “CVLOGRUS” LLC, with the persons who have been assigned the processing or who have legally assigned the processing.

Such agreements may define, among other things:

- 4.5.1. purposes, conditions, operations with personal data, terms of processing of personal data;
- 4.5.2. roles, functions and responsibilities of the parties, including measures to ensure confidentiality and information security;
- 4.5.3. rights and responsibilities of the parties with regard to the processing of personal data.

4.6. Where the applicable law is the GDPR, assuming the existence of DPA agreements between the parties to the processing, the role of the DPA, after including specific sections with the terms of processing of personal data, may be fulfilled by the following documents:

- 4.6.1. licence/sub-license agreements for the right to use the software;
- 4.6.2. contracts and agreements which include data processing mandates;
- 4.6.3. confidentiality and information security agreements;
- 4.6.4. rules for the use of information resources, user agreements;
- 4.6.5. regulations, provisions, agreements on data processing, level of service.

## **5. Transfer and distribution of personal data**

5.1. When the Company transfers personal data, the personal data subject must give his or her consent in writing or electronically. If the data subject has consented to the transfer of personal data in electronic form, he or she shall sign the consent with an enhanced electronic digital signature.

5.2. The Company shall be entitled to transfer information that relates to personal data without the consent of the personal data subject, if such information needs to be transferred at the request of public authorities, in the manner prescribed by law.

5.3. The Company may not disclose personal data to third parties without the consent of the data subject.

5.4. Consent to the processing of personal data that has been authorized by the personal data subject for distribution shall be formalized separately from other consents of the personal data subject to the processing of his/her personal data.

5.5. If the consent to the distribution of personal data provided by the personal data subject does not imply that he or she consented to the distribution of personal data, such personal data shall be processed by the Company without the right to distribute it.

5.6. If the consent to transfer personal data provided by the personal data subject does not imply that he/she has not imposed prohibitions and conditions on the processing of personal data or has not specified the categories and list of personal data for the processing of which the personal data subject imposes conditions and prohibitions, the Company processes such personal data without the possibility of transfer (distribution, provision, access) to an unlimited number of persons.

5.7. Consent to the distribution of personal data may be granted to the Company:

- directly;
- using the information system of the competent authority for the protection of the rights of personal data subjects.

5.8. The consent to the distribution of personal data may prohibit the transfer (other than granting access) of such personal data by the Company to an unlimited number of persons, as well as prohibit the processing or conditions of processing (other than granting access) of such personal data by an unlimited number of persons. The Company shall not refuse to impose prohibitions and conditions on the personal data subject.

5.9. The Company shall, within three working days of receiving the personal data subject's consent to the distribution of personal data, publish information about the conditions of processing and the availability of prohibitions and conditions on the processing of the subject's personal data for distribution to an unlimited number of persons.

5.10. The transfer (distribution, submission, access) of personal data that has been authorized by the personal data subject for distribution shall be terminated at any time on his or her request. Such request must include the surname, first name, patronymic (if any), contact information (telephone number, e-mail address or postal address) of the subject, and a list of the personal data the processing of which is to be terminated.

5.11. The consent of the personal data subject to the distribution of personal data shall cease to be valid when the Company receives the request specified in Clause 5.10 of this Regulation.

5.12. The personal data subject may request to discontinue the transfer (distribution, submission, access) of their personal data previously authorized for distribution to any person processing their personal data in case of non-compliance with the provisions of Federal Law No. 152-FZ dated 27.07.2006 or to bring a court action with such a request. The Company or a third party shall discontinue the transfer (distribution, submission, access) of personal data within three working days of receiving the request or within the period specified in a legally effective court decision. If such a time limit is not specified in the court decision, the Company or a third party shall discontinue the transfer of personal data within three working days after the court decision enters into legal force.

5.13. Processed personal data shall be destroyed or depersonalized under the following conditions:

5.13.1. achievement of the purpose of personal data processing or the maximum storage period - to be destroyed or depersonalized within 30 days;

5.13.2. the need to achieve the purpose of personal data processing is no longer necessary - within 30 days;

5.13.3. submission of confirmation by the personal data subject or his/her legal representative that the personal data is illegally obtained or is not necessary for the stated purpose of processing - within 7 days;

5.13.4. failure to ensure lawfulness of personal data processing - within 10 days;

5.13.5. withdrawal of personal data subject's consent to processing of personal data, if storage of personal data is no longer required for the purposes of processing of personal data - within 30 days;



5.13.6. withdrawal of consent by the personal data subject to use personal data for contacting potential customers when promoting software products, goods, works and services - within 2 days;

5.13.7. expiry of the limitation period for the legal arrangements under which personal data is or has been processed;

5.13.8. liquidation (reorganization) of “CVLOGRUS” LLC, if the processing was performed exclusively for the benefit of this Company and no assignee of the Company is available.

5.14. In the case of cross-border transfer of personal data, “CVLOGRUS” LLC shall make sure that the foreign country to the territory of which the transfer is made provides adequate protection of the rights of personal data subjects or that this foreign country is a party to the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data.

5.14.1. Cross-border transfers to foreign countries that do not adequately protect the rights of personal data subjects may be carried out in the cases stipulated by 152-FZ and the GDPR.

## **6. Processing of electronic user data, including cookies**

6.1. “CVLOGRUS” LLC may, for the purposes of personal data processing as set out in this Regulation, collect electronic user data on its websites automatically, without the need for the user to participate and perform any data transmission operations.

6.2. The reliability of the electronic data collected by “CVLOGRUS” LLC is not verified; the information is processed "as is" as it is received from the client's device.

6.3. Visitors and users of “CVLOGRUS” LLC websites may be shown pop-up notifications about the collection and processing of cookies with a link to the Regulation and buttons to accept the terms of processing or to close the pop-up notification.

6.4. Such notifications mean that when you visit and use websites, information resources and web applications of “CVLOGRUS” LLC or your device, remember the session or save certain user settings and preferences specific to those particular sites.

Such information, once it has been saved in the browser and until it expires or is deleted from the device, will be sent on every subsequent request to the website on whose behalf it has been saved, together with this request for processing on the “CVLOGRUS” LLC side.

6.5. The processing of cookies data is necessary for “CVLOGRUS” LLC for the correct operation of the websites, in particular their functions relating to the access of registered users to software products, services, works and resources of “CVLOGRUS” LLC; the personalization of users; improving the effectiveness and convenience of the website and for other purposes specified in the Regulation.

6.6. In addition to the processing of cookies set by the “CVLOGRUS” LLC websites themselves, users and visitors may be set cookies related to third-party websites, e.g. in cases where third-party components and software are used on the “CVLOGRUS” LLC websites.

The processing of such cookies is governed by the regulations of the respective websites to which they relate and is subject to change without notice to users of the SKB Kontur websites. Such cases may include placement on websites:

- 6.6.1. access counters, analytical and statistical services such as Yandex.Metrika or Google Analytics to collect traffic statistics to publicly accessible pages of websites;
- 6.6.2. auxiliary service widgets for feedback, chats and other types of communication with users;
- 6.6.3. search advertising systems, banner and other marketing networks;
- 6.6.4. authorization buttons on websites using social media accounts;
- 6.6.5. other third-party components used by “CVLOGRUS” LLC on its websites.

6.7. The user's acceptance of the conditions for processing cookies or the closing of the pop-up notification in accordance with the regulations shall be regarded as consent to the processing of cookies on the “CVLOGRUS” LLC websites.

6.8. If the user does not agree to the processing of cookies, they must accept the risk that the site's functions and features may not be fully accessible and then follow one of the following options:

- 6.8.1. independently configure its browser according to its documentation or help so that it does not accept or send cookies for any websites or for a specific “CVLOGRUS” LLC website or a third party website on a permanent basis;
- 6.8.2. switch to the browser's special incognito mode to use cookies before closing the browser window or before switching back to normal mode;
- 6.8.3. leave the website to avoid further processing of cookies.

6.9. The user can use the browsers' built-in cookies to manage his or her own stored data, including removing or browsing history of cookies set by websites, including:

- 6.9.1. the addresses of the sites and the paths to which the cookies will be sent;
- 6.9.2. names and values of parameters stored in cookies;
- 6.9.3. validity of cookies.

## **7. Privacy and security of personal data**

7.1. Personal data in “CVLOGRUS” LLC shall be kept confidential in accordance with applicable laws, local acts of the Companies, terms of agreements and contracts concluded by “CVLOGRUS” LLC, except for cases:

- 7.1.1. if personal data is publicly available, contained in publicly accessible sources of personal data or authorized for distribution by the data subject;
- 7.1.2. if information is subject to mandatory disclosure to third parties, including state authorities, in accordance with the laws applicable to “CVLOGRUS” LLC.

7.2. “CVLOGRUS” LLC takes necessary and sufficient legal, organizational and technical measures to ensure the security of personal data to protect it from unauthorized (including accidental) access, destruction, modification, blocking of access and other unauthorized actions. Such measures include, but are not limited to:

- 7.2.1. appointment of natural or legal persons responsible for the organization of personal data processing and security in the specific Company;
- 7.2.2. issuing local acts on personal data processing, information security and making employees aware of them;

- 7.2.3. training of employees in the processing of personal data, ensuring information security;
- 7.2.4. ensure the physical security of the premises and processing facilities, access control, security guards, video surveillance;
- 7.2.5. restriction and delimitation of access to personal data and means of processing by employees and other persons, monitoring activities with personal data;
- 7.2.6. application of security means (antivirus, firewalls, unauthorized access protection, cryptographic protection of information), including, if necessary, those that have passed the conformity assessment procedure in accordance with the established order;
- 7.2.7. recording and storing data carriers to prevent their theft, substitution, unauthorized copying and destruction;
- 7.2.8. backing up information so that it can be restored;
- 7.2.9. exercising internal control over compliance with the established procedure, verifying the effectiveness of the measures taken, responding to incidents;
- 7.2.10. checking whether contracts contain confidentiality and security clauses for personal data, if necessary;
- 7.2.11. other measures in accordance with the local acts of “CVLOGRUS” LLC.

## **8. Rights of personal data subjects**

8.1. The data subject shall have the right to withdraw his/her consent to the processing of his/her personal data by sending a corresponding request to the Company or to “CVLOGRUS” LLC representatives in other countries, by post or by contacting the Company in person.

8.2. The data subject shall have the right to receive information relating to the processing of his or her personal data, including information that contains as follows:

- 8.2.1. confirmation of the processing of personal data by “CVLOGRUS” LLC;
- 8.2.2. legal basis and purpose for processing personal data;
- 8.2.3. purposes and methods of personal data processing used at “CVLOGRUS” LLC;
- 8.2.4. name and location of “CVLOGRUS” LLC, information on persons (except employees) who have access to personal data or to whom personal data may be disclosed on the basis of a contract, agreement with the Company or on the basis of federal law;
- 8.2.5. processed personal data relating to the respective personal data subject, the source of such data, unless another procedure for the provision of such data is prescribed by federal law;
- 8.2.6. terms of processing of personal data, including storage periods;
- 8.2.7. procedure for implementing the personal data subject's rights under 152-FZ;
- 8.2.8. information on cross-border transfers made or suspected to have been made;
- 8.2.9. name or surname, first name, patronymic and address of the person processing the personal data on behalf of “CVLOGRUS” LLC, if the processing is or will be assigned to such person;
- 8.2.10. other information required by 152-FZ or other federal laws.

8.3. The personal data subject shall have the right to request “CVLOGRUS” LLC to correct his/her personal data, to block or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the declared processing purpose, as well as to take measures to protect his/her rights, as provided by the applicable law.

8.4. If a personal data subject believes that “CVLOGRUS” LLC processes his/her personal data in violation of the requirements of the 152-FZ or otherwise violates his/her rights and freedoms, the personal data subject shall have the right to appeal against the actions or inaction of the

Company, a part of “CVLOGRUS” LLC, to Roscomnadzor, another authorized supervisory authority or in court.

8.5. The personal data subject shall be entitled to seek protection of his or her rights and legitimate interests, including compensation for damages and/or compensation for moral harm in a judicial procedure.

## **9. Roles and responsibilities**

9.1. The rights, duties and responsibilities of “CVLOGRUS” LLC shall be determined by the applicable laws, agreements of the Company.

9.2. Responsibility of the Company's employees involved in the processing of personal data due to their functional duties for the proper processing and misuse of personal data shall be established in accordance with the contract between the Company and the employee, the non-disclosure obligation, local acts of the Company.

9.3. Control of compliance with the requirements of this Regulation in “CVLOGRUS” LLC shall be exercised in general by those responsible for the organization of personal data processing or by individual structural units and authorized persons in accordance with local acts of the Company.

9.4. Responsibility of persons involved in the processing of personal data on the basis of orders of “CVLOGRUS” LLC for the proper processing and misuse of personal data shall be established in accordance with the terms of the contract, non-disclosure arrangement or other agreement concluded between “CVLOGRUS” LLC and the counterparty.

9.5. In individual cases provided for by applicable laws, e.g. the GDPR or local laws on the processing of personal data of individual countries, “CVLOGRUS” LLC may appoint representatives in the territories of the European Union or these countries. In such cases, the rights, duties and responsibilities shall be allocated in accordance with contracts, agreements between such representatives and “CVLOGRUS” LLC and the contact details of the representatives shall be included in this Regulation.

9.6. Persons found guilty of violating the rules governing the processing and information security of personal data shall bear material, disciplinary, administrative, civil or criminal liability in accordance with the procedure established by applicable law, local acts, agreements of “CVLOGRUS” LLC.