

## User personal data processing terms

### 1. General provisions

Joint Stock Company Intercomp is part of Sberbank ecosystem and operates under the trade name Sber Solutions.

These user personal data processing terms (hereinafter the “Terms”) are drawn up in accordance with the requirements of Federal Law No. 152-GZ On Personal Data dated July 27, 2006 and set out how personal data are processed as well as the measures for JSC Intercomp (hereinafter the “Operator”) to ensure personal data security.

Observing human and civil rights and freedoms when processing personal data, including protecting personal and family privacy, is the Operator’s most important objective when performing its activity.

These terms apply to any information that the Operator can obtain about the website visitors of <http://sber-solutions.ru>.

### 2. Terms and definitions

**Automated Personal Data Processing** means the processing of personal data using computer technology.

**Personal Data Blocking** means the temporary termination of personal data processing (except in cases where processing is necessary for personal data rectification).

**Website** means a collection of graphic and information materials as well as computer software programs and databases ensuring their availability on the internet at <http://sber-solutions.ru>

**Personal Data Information System** means a set of IT and technical means contained in databases of personal data and ensuring their processing.

**Personal Data Depersonalization** means actions as a result of which it becomes impossible without using additional information to determine that the personal data are those of a specific user or data subject.

**Personal Data Processing** means any action (operation) or a set of actions (operations) performed on personal data with or without automated equipment, including collection, recording, systematization, saving, storage, rectification (update, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion and destruction of personal data.

**Operator** means the state authority, municipal authority, legal entity or individual who on their own or together with others organize and/or process personal data as well as determine the purpose of personal data processing, the composition of personal data to be processed and the actions performed with personal data.

**Personal Data** means any information relating to a user of <http://sber-solutions.ru> website directly or indirectly identified or identifiable.

**User** means any website visitor of <http://sber-solutions.ru>

**Personal Data Provision** means actions aimed at disclosing personal data to a specific person or a particular group of persons.

**Personal Data Dissemination** means actions aimed at disclosing personal data to the public (personal data transfer) or making personal data public, including disclosing personal data in mass media, posting them in information and telecommunication networks or providing access to personal data in any other way.

**Cross-border Personal Data Transfer** means the transfer of personal data to the territory of a foreign country, to a foreign country's authority, to a foreign individual or foreign legal entity.

**Personal Data Destruction** means any actions as a result of which it becomes impossible to restore the content of personal data in a personal data information system and/or as a result of which the material media on which personal data are stored are destroyed

### 3. List of processed user personal data

The Operator may process the following user personal data:

- Full name;
- Email address;
- Telephone number;
- The site also collects and processes depersonalized data about visitors (including cookies) using internet services (Yandex Metrics and Google Analytics).

The above data are hereinafter referred to as the general concept of Personal Data.

### 4. Purposes of personal data processing

The purpose of personal data processing is to inform the User by sending emails; fulfill the Website Administration's obligation to Users regarding the use of the Website and its services.

The Operator is entitled to send to the User notices of new products and services, special offers and various events. The User can always decline to receive informational messages by sending an email to the Operator at [info@sber-solutions.ru](mailto:info@sber-solutions.ru) titled Unsubscribe from Notices of New Products, Services and Special Offers.

User depersonalized data are collected using internet services and are used to collect information about Users' actions on the site as well as improve the site quality and its content.

### 5. Grounds for user personal data processing

The Operator processes user personal data only if they are completed and/or sent by the User itself using special forms on <http://sber-solutions.ru> website. By filling out these forms and/or sending its personal data to the Operator, the User agrees with these Terms.

The Operator processes depersonalized user data if this is allowed in the settings of the User's browser (saving of cookies and use of JavaScript enabled).

### 6. Collection, storage, transfer and other types of user personal data processing

The security of personal data processed by the Operator is ensured through the implementation of legal, organizational and technical measures necessary to fulfill the requirements of personal data protection law.

The Operator ensures personal data security and takes all possible measures to prevent unauthorized access to personal data.

User personal data will under no circumstances be passed on to third parties except in cases where this is required by law.

If any inaccuracies are found in personal data, Users can update them on their own by sending a notice to the Operator's email address at [info@sber-solutions.ru](mailto:info@sber-solutions.ru) titled Personal Data Update.

Personal data may be processed for an unlimited time period. Users may at any time withdraw their consent for personal data processing by sending a notice to the Operator's email address at [info@sber-solutions.ru](mailto:info@sber-solutions.ru) titled Withdrawal of Consent for Personal Data Processing.

## **7. Cross-border Personal Data Transfer**

Prior to cross-border transfer of personal data, the Operator must ensure that the foreign country to which personal data is to be transferred provides reliable protection of data subject rights.

Personal data may be transferred to foreign countries that do not meet the above requirements only with the written consent of data subjects authorizing cross-border transfer of personal data and/or performance of contract with a data subject.

## **8. Final provisions**

Users may obtain clarifications of issues related to personal data processing by emailing the Operator at [info@sber-solutions.ru](mailto:info@sber-solutions.ru), sending postal mail to the following address: 121357, Russian Federation, Moscow, ulitsa Vereyskaya 29, Block 33 or sending an electronic document certified by digital signature in compliance with Russian law.

Any changes made by the Operator to the terms for personal data processing will be found in this document. The Terms are valid and remain in force with no time limit until they are amended.

The latest Personal Data Processing Policy is available at: [https://sber-solutions.ru/upload/iblock/276/User\\_personal\\_data\\_processing\\_terms.pdf](https://sber-solutions.ru/upload/iblock/276/User_personal_data_processing_terms.pdf)