

Personal data processing policy of Aquila Invest LLC

1 GENERAL PROVISIONS

- 1.1 This personal data processing policy is drawn up in accordance with the requirements of the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data" (the "**Law on Personal Data**") and determines the procedure for processing personal data and measures to ensure the security of personal data taken by Aquila Invest LLC (PSRN 1237700578686, TIN 9729353593, hereinafter the "**Operator**").
- 1.2 The operator sets as its most important goal and condition for carrying out its activities the observance of the rights and freedoms of man and citizen when processing his personal data, including the protection of the rights to privacy, personal and family secrets.
- 1.3 This Operator's policy regarding the processing of personal data (the "**Policy**") applies to all information that the Operator can obtain about visitors to the Website.

2 BASIC CONCEPTS USED IN THE POLICY

- 2.1 Automated processing of Personal data – processing of the Personal data using computer technology.
- 2.2 Blocking of Personal Data – temporary cessation of processing of the Personal data (except for cases where processing is necessary to clarify the Personal data).
- 2.3 Website – collection of graphic and information materials, as well as computer programs and databases that ensure their availability on the Internet at the network address <https://aquila-invest.ru>.
- 2.4 Information system of Personal data – a set of Personal data contained in databases and information technologies and technical means that ensure their processing.
- 2.5 Depersonalization of Personal data – actions as a result of which it is impossible to determine, without the use of additional information, the ownership of the Personal data by a specific User or other subject of the Personal data.
- 2.6 Processing of Personal data – any action (operation) or set of actions (operations) performed using automation tools or without the use of such means with Personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of the Personal data.
- 2.7 Personal data - any information relating directly or indirectly to a specific or identified User of the Website, including, but without limitation, personal information that the User provides about himself independently in the process of using the Website, as well as data that is automatically transmitted services of the Website in the process of their use using software installed on the User's device, including IP address, cookie data, information about the User's browser (or other program through which the services are accessed), technical characteristics of the equipment and software used by the User, date and time of access to services, addresses of requested pages and other similar information.
- 2.8 Personal data authorized by the subject of Personal data for distribution - Personal data, access to an unlimited number of persons to which is provided by the subject of Personal data by giving consent to the processing of Personal data authorized by

the subject of Personal data for distribution in the manner prescribed by the Law on Personal data (hereinafter - Personal data, authorized for distribution).

- 2.9 User – any visitor to the Website.
- 2.10 Providing Personal Data – actions aimed at disclosing Personal data to a certain person or a certain circle of persons.
- 2.11 Distribution of Personal Data - any actions aimed at disclosing Personal data to an indefinite number of persons (transfer of the Personal data) or familiarizing an unlimited number of persons with the Personal data, including publication of the Personal data in the media, posting in information and telecommunication networks or providing access to the Personal data in any other way.
- 2.12 Cross-border transfer of Personal data – transfer of the Personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.
- 2.13 Destruction of Personal Data – any actions as a result of which the Personal data is irretrievably destroyed with the impossibility of further restoration of the content of Personal data in the Personal data information system and/or the material media of Personal data are destroyed.

3 **BASIC RIGHTS AND OBLIGATIONS OF THE OPERATOR**

- 3.1 The operator has the right:
 - (a) to receive from the subject of Personal data reliable information and/or documents containing Personal data;
 - (b) in the event that the subject of Personal Data withdraws consent to the processing of Personal data, as well as sends an application to stop processing Personal data, the Operator has the right to continue processing Personal data without the consent of the subject of Personal data if there are grounds specified in the Law on Personal Data;
 - (c) to independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations provided for by the Law on Personal Data and regulations adopted in accordance with it, unless otherwise provided by the Law on Personal Data or other legislation of the Russian Federation in force.
- 3.2 The Operator is obliged:
 - (a) to provide the subject of Personal data, at his request, with information regarding the processing of his Personal data;
 - (b) to organize the processing of Personal data in the manner established by the legislation of the Russian Federation in force at the relevant time;
 - (c) to respond to requests from subjects of Personal data and their legal representatives in accordance with the requirements of the Law on Personal Data;
 - (d) to report to the authorized body for the protection of the rights of subjects of Personal data, at the request of this body, the necessary information within 10 (ten) days from the date of receipt of such a request;

- (e) publish or otherwise provide unrestricted access to this Policy regarding the processing of the Personal data;
- (f) take legal, organizational and technical measures to protect the Personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of the Personal data, as well as from other unlawful actions in relation to the Personal data;
- (g) stop transfer (distribution, provision, access) of the Personal data, stop processing and destroy the Personal data in the manner and cases provided for by the Law on Personal Data;
- (h) perform other duties provided for by the Law on Personal Data.

4 **BASIC RIGHTS AND OBLIGATIONS OF THE PERSONAL DATA SUBJECTS**

4.1 Subjects of the Personal data have the right:

- (a) to receive information regarding the processing of their Personal data, except for cases provided for by the legislation of the Russian Federation in force. The information is provided to the subject of the Personal data by the Operator in an accessible form, and it should not contain the Personal data relating to other subjects of the Personal data, unless there are legal grounds for the disclosure of such Personal data. The list of information and the procedure for obtaining it is established by the Law on Personal Data;
- (b) to require the Operator to clarify their Personal data, block or destroy such Personal data if the Personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, and also take measures provided by law to protect their rights;
- (c) to withdraw consent to the processing of the Personal data, as well as to send a request to stop processing the Personal data;
- (d) to appeal to the authorized body for the protection of the rights of subjects of personal data or in court against unlawful actions or inaction of the Operator when processing their Personal data;
- (e) to exercise other rights provided for by the legislation of the Russian Federation in force at the relevant time.

4.2 Subjects of the Personal data are obliged to:

- (a) provide the Operator with reliable information;
- (b) inform the Operator on clarification (updating, changing) of their Personal data.

4.3 Persons who provided the Operator with false information about themselves or information about another subject of the Personal data without the latter's consent are liable in accordance with the legislation of the Russian Federation in force.

5 **PRINCIPLES FOR PROCESSING PERSONAL DATA**

5.1 The processing of the Personal data is carried out on a legal and fair basis.

5.2 The processing of the Personal data is limited to achieving specific, pre-defined and

legitimate purposes.

5.3 When processing Personal data, the accuracy of the Personal data, its sufficiency, and, where necessary, its relevance in relation to the purposes of processing the Personal data are ensured.

5.4 The storage of the Personal data is carried out in a form that makes it possible to identify the subject of the Personal data, no longer than required by the purposes of processing Personal data, unless the storage period for Personal data is established by the legislation of the Russian Federation in force at the relevant time, an agreement to which a party, beneficiary or guarantor is the subject of the Personal data.

6 **PURPOSES OF PROCESSING PERSONAL DATA**

6.1 Processing of Personal data is carried out for the following purposes:

- (a) informing the User by sending emails;
- (b) establishing feedback with the User, including sending notifications, requests regarding the use of the Website, provision of services, processing requests and applications from the User;
- (c) confirmation of the accuracy and completeness of the Personal data provided by the User;
- (d) providing the User with effective customer and technical support if problems arise related to the use of the Website.

7 **CONDITIONS FOR PROCESSING PERSONAL DATA**

7.1 Processing of Personal data is carried out with the consent of the Personal data subject to the processing of his Personal data.

7.2 Processing of Personal data is necessary to achieve the goals provided for by the legislation of the Russian Federation in force, as well as those specified in paragraph 6.1 of this Policy, for the implementation of the functions, powers and responsibilities assigned by the legislation of the Russian Federation and this Policy to the Operator.

7.3 Processing of Personal data is necessary for the administration of justice, execution of a judicial act, act of another body or official, subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings in force.

7.4 Processing of Personal data is necessary for the execution of an agreement to which the Personal data subject is a party or beneficiary or guarantor, as well as for concluding an agreement at the initiative of the Personal data subject or an agreement under which the Personal data subject will be a beneficiary or guarantor.

7.5 Processing of Personal data is necessary to exercise the rights and legitimate interests of the Operator or third parties or to achieve socially significant goals, provided that the rights and freedoms of the Personal data subject are not violated.

7.6 The processing of Personal data is carried out, access to an unlimited number of persons to which is provided by the subject of the Personal data or at his request (hereinafter referred to as publicly available Personal data).

7.7 The Operator processes Personal data that is subject to publication or mandatory

disclosure in accordance with the legislation of the Russian Federation in force.

8 THE PROCEDURE FOR COLLECTING, STORING, TRANSFERRING AND OTHER TYPES OF PROCESSING OF PERSONAL DATA

- 8.1 The security of the Personal data processed by the Operator is ensured by implementing legal, organizational and technical measures necessary to comply with the requirements of the legislation of the Russian Federation in the field of personal data protection in force.
- 8.2 The Operator ensures the safety of the Personal data and takes all possible measures to prevent access to the Personal data by unauthorized persons.
- 8.3 The User's Personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of the legislation of the Russian Federation in force or in the event that the subject of the Personal data has given consent to the Operator to transfer data to a third party to fulfill obligations under a civil law contract.
- 8.4 If inaccuracies are identified in the Personal data, the User can update them independently by sending a notification to the Operator to the Operator's email address info@aquila-invest.ru marked "Updating Personal Data".
- 8.5 The period for processing Personal data is determined by the achievement of the purposes for which the Personal data was collected, unless a different period is provided for by the contract or the legislation of the Russian Federation in force.
- 8.6 The User may at any time withdraw his consent to the processing of the Personal data by sending a notification to the Operator via email to the Operator's email address info@aquila-invest.ru marked "Withdrawal of consent to the processing of Personal data".
- 8.7 All information that is collected by third-party services, including payment systems, communications and other service providers, is stored and processed by these persons (operators) in accordance with their user agreement and privacy policy, as well as other applicable internal documents. The Operator is not responsible for the actions of third parties, including, without limitation, those service providers specified in this paragraph 8.7.
- 8.8 Prohibitions established by the subject of the Personal data on the transfer (except for providing access), as well as on processing or conditions for processing (except for gaining access) of Personal data permitted for distribution, do not apply in cases of processing Personal data in state, public and other public interests determined by the legislation of the Russian Federation in force.
- 8.9 When processing Personal data, the Operator ensures the confidentiality of Personal data.
- 8.10 The Operator stores Personal data in a form that makes it possible to identify the subject of the Personal data for no longer than required by the purposes of processing Personal data, unless the storage period for Personal data is established by the legislation of the Russian Federation in force, an agreement to which the subject of the Personal data is a party, beneficiary or guarantor.
- 8.11 The condition for terminating the processing of Personal data may be the achievement of the purposes of processing Personal data, the expiration of the consent of the Personal data subject, the withdrawal of consent by the Personal data

subject or a requirement to cease the processing of Personal data, as well as the identification of unlawful processing of Personal data.

9 **LIST OF ACTIONS PERFORMED BY THE OPERATOR WITH RECEIVED PERSONAL DATA**

9.1 The Operator collects, records, systematizes, accumulates, stores, refines (updates, changes), extracts, uses, transfers (distributes, provides, access), depersonalizes, blocks, deletes and destroys Personal data.

9.2 The Operator carries out automated processing of Personal data with or without receiving and/or transmitting the received information via information and telecommunication networks.

10 **CROSS-BORDER TRANSFER OF PERSONAL DATA**

10.1 Before starting activities for the cross-border transfer of the Personal data, the Operator is obliged to notify the authorized body for the protection of the rights of personal data subjects of its intention to carry out cross-border transfer of the Personal data (such notification is sent separately from the notification of the intention to process Personal data).

10.2 Before submitting the above notification, the operator is obliged to obtain relevant information from the authorities of a foreign state, foreign individuals, foreign legal entities to whom the cross-border transfer of the Personal data is planned.

11 **CONFIDENTIALITY OF PERSONAL DATA**

The Operator and other persons who have access to the Personal data are obliged not to disclose to third parties or distribute personal data without the consent of the Personal data subject, unless otherwise provided by the legislation of the Russian Federation in force.

12 **FINAL PROVISIONS**

12.1 The User can receive any clarification on issues of interest regarding the processing of his Personal data by contacting the Operator via email info@aquila-invest.ru.

12.2 This document will reflect any changes to the Operator's Personal data processing policy. The Policy is valid indefinitely until it is replaced by a new version.

12.3 The current version of the Policy is freely available on the Internet at https://aquila-invest.ru/privacy_policy_en.pdf.