

## **Policy on Processing and Protection of Personal Data and Use of Cookies:**

**[www.comvex.ru](http://www.comvex.ru)**

**(hereinafter referred to as the "Policy")**

### **1. General Provisions**

1.1. This Personal Data Processing Policy has been compiled in accordance with the Constitution of the Russian Federation, the Civil Code of the Russian Federation, the Federal Law "On Information, Information Technologies and Information Protection", Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data" (hereinafter referred to as the "Personal Data Law") and defines the procedure for processing personal data and measures to ensure the security of personal data undertaken by LIMITED LIABILITY COMPANY "SIGMA EXPO GROUP" (TIN: 7743378236, PSRN 1227700183215, address: 125504, MOSCOW, INT.TER. MUNICIPAL DISTRICT ZAPADNOYE DEGUNINO, DMITROVSKOYE SHOSSE, 71B, FLOOR, ROOM 6, 4/6, registration number in the Register of Personal Data Operators No. 77-22-085505, hereinafter referred to as the "Operator"), for an individual (hereinafter referred to as the "User", synonymous with the term "Personal Data Subject") when the User uses the Website: [www.comvex.ru](http://www.comvex.ru) (hereinafter referred to as the "Website").

1.2. The Operator sets as its most important goal and condition for carrying out its activities the observance of human and civil rights and freedoms in the processing of personal data, including the protection of the right to privacy, personal and family secrets.

1.3. This Policy of the Operator regarding the processing of personal data (hereinafter referred to as the "Policy") applies to all information that the Operator may receive about Users of the Website. The Policy applies to all personal data of Website Users that the Operator processes.

1.4. Before starting to use the Website, the User (Personal Data Subject) must carefully read this Policy.

The User's use of any functions, services and features of the Website, including any viewing of the Website page by the User, means the User's unconditional agreement with this Policy and the conditions for processing personal information (personal data) specified therein.

These actions of the User are regarded as the User's statement that they have read, understood and agreed to comply with the terms of the Policy, including all special terms and rules mentioned therein, without any exceptions or reservations. If they disagree with these terms, the User must refrain from using the Website services.

Familiarization with the Policy is not consent to the processing of personal data. Consent to the processing of personal data is obtained by the Operator separately in the manner established by Article 9 of Federal Law No. 152-FZ dated July 27, 2006.

1.5. This Policy applies only to the Website.

The Website does not control and is not responsible for third-party websites to which the User may navigate via links available on the Website.

1.6. The Policy applies to relations in the field of personal data processing that arose with the Operator both before and after the approval of this Policy.

### **2. Basic Terms Used in the Policy**

2.1. **Operator** — LIMITED LIABILITY COMPANY "SIGMA EXPO GROUP" (TIN: 7743378236, PSRN 1227700183215, address: 125504, MOSCOW, INT.TER. MUNICIPAL DISTRICT ZAPADNOYE DEGUNINO, DMITROVSKOYE SHOSSE, 71B, FLOOR, ROOM 6, 4/6, registration number in the Register of Personal Data Operators No. 77-22-085505), independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.

2.2. **User** (synonymous with the term "Website User", "Website Visitor") — any visitor to the Website.

2.3. **Personal Data** — any information relating directly or indirectly to the User of the Website.

2.4. **Personal Data Authorized by the Personal Data Subject for Distribution** — personal data to which access by an unlimited number of persons is provided by the Personal Data Subject by giving consent to the processing of personal data authorized by the Personal Data Subject for distribution in the manner provided by the Personal Data Law (hereinafter referred to as personal data authorized for distribution).

2.5. **Automated Processing of Personal Data** — processing of personal data using computer technology.

2.6. **Personal Data Information System** — a collection of personal data contained in databases, and information technologies and technical means that ensure their processing.

2.7. **Processing of Personal Data** — any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), depersonalization, blocking, deletion, destruction of personal data.

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

2.9. **Depersonalization of Personal Data** — actions as a result of which it is impossible to determine, without the use of additional information, the ownership of personal data to a specific User or other Personal Data Subject.

2.10. **Blocking of Personal Data** — temporary cessation of processing of personal data (except in cases where processing is necessary to clarify personal data).

2.11. **Distribution of Personal Data** — any actions aimed at disclosing personal data to an indefinite number of persons (transfer of personal data) or at familiarizing an unlimited number of persons with personal data, including making personal data public in mass media, posting in information and telecommunication networks or providing access to personal data in any other way.

2.12. **Cross-border Transfer of Personal Data** — transfer of personal data to the territory of a foreign state, to a foreign state authority, to a foreign individual or to a foreign legal entity.

2.13. **Destruction of Personal Data** — any actions as a result of which personal data are destroyed irrevocably with the impossibility of further restoration of the content of personal data in the personal data information system and (or) material carriers of personal data are destroyed.

2.14. **Cookies** — a small fragment of data sent by a web server and stored on the User's computer, which a web client or web browser sends back to the web server in an HTTP request each time an attempt is made to open a page of the corresponding Website. The Personal Data Subject has the

option to prohibit the creation of cookies or delete existing ones using the corresponding web browser settings; however, in such a case, the maximum full use of all the functionality of the internet service will be impossible.

**2.15. Confidentiality of Personal Data** — a requirement mandatory for the Operator or other person who has gained access to personal data not to allow their distribution without the consent of the Personal Data Subject or the presence of other legal grounds.

### **3. Basic Rights and Obligations of the Operator**

#### **3.1. The Operator has the right to:**

1. receive reliable information and/or documents containing personal data from the Personal Data Subject;
2. entrust the processing of personal data to another person with the consent of the Personal Data Subject, unless otherwise provided by federal law, on the basis of an agreement concluded with this person. The person processing personal data on behalf of the Operator is obliged to comply with the principles and rules for processing personal data provided by the Personal Data Law;
3. in case of withdrawal by the Personal Data Subject of consent to the processing of personal data, the Operator has the right to continue processing personal data without the consent of the Personal Data Subject if there are grounds specified in the Personal Data Law;
4. independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations provided by the Personal Data Law and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws.

#### **3.2. The Operator is obliged to:**

1. provide the Personal Data Subject, at their request, with information regarding the processing of their personal data;
2. organize the processing of personal data in the manner established by the current legislation of the Russian Federation;
3. respond to requests and inquiries from Personal Data Subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
4. report to the authorized body for the protection of the rights of Personal Data Subjects at the request of this body the necessary information;
5. publish or otherwise provide Personal Data Subjects with access to this Policy regarding the processing of personal data;
6. take legal, organizational and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions regarding personal data;
7. stop the transfer (provision, access) of personal data, stop processing and destroy personal data in the manner and cases provided by the Personal Data Law;

8. report to the authorized body for the protection of the rights of Personal Data Subjects (the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor)) at request the necessary information within 30 (thirty) days from the date of receipt of such request. This period may be extended to 45 days upon sending to Roskomnadzor a reasoned notification of the reasons for the extension (Part 4 of Article 20 of Federal Law No. 152-FZ dated July 27, 2006). In case of a request in connection with a personal data breach, the Operator is obliged to respond: - within 1 (one) day if a primary notification of the breach has not yet been submitted; - within 3 (three) days for clarifying information on a previously sent notification.

When the Operator, Roskomnadzor or other interested party identifies the fact of unlawful or accidental transfer (provision, distribution) of personal data (access to personal data) that resulted in violation of the rights of personal data subjects (hereinafter referred to as an incident), the Operator:

**a) within 24 (twenty-four) hours** from the moment the incident is detected, notifies Roskomnadzor of the incident, reporting the following information:

- the alleged causes that led to the violation of the rights of personal data subjects;
- the alleged harm caused to the rights of personal data subjects;
- measures taken to eliminate the consequences of the incident;
- information about the person authorized by the Operator to interact with Roskomnadzor on issues related to the incident;

**b) within 72 (seventy-two) hours** from the moment the incident is detected, notifies Roskomnadzor of the results of the internal investigation of the identified incident and provides information about persons whose actions caused it (if available);

3.2.9. in the manner determined by the federal executive body authorized in the field of security (FSB of Russia), ensure interaction with the state system for detecting, preventing and eliminating the consequences of computer attacks on information resources of the Russian Federation, including informing the specified system of computer incidents that resulted in unlawful transfer (provision, distribution, access) of personal data (in accordance with Part 1.1 of Article 18.1 of Federal Law No. 152-FZ dated July 27, 2006);

10. fulfill other obligations provided by the Personal Data Law.

#### **4. Basic Rights and Obligations of Personal Data Subjects**

4.1. Personal Data Subjects have the right to:

4.1.1. receive information regarding the processing of their personal data, except in cases provided by federal laws. Information is provided to the Personal Data Subject by the Operator in an accessible form, and it should not contain personal data relating to other Personal Data Subjects, except in cases where there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Personal Data Law;

4.1.2. require the Operator to clarify their personal data, block or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as take measures provided by law to protect their rights;

4.1.3. put forward the condition of prior consent when processing personal data for the purpose of promoting goods, works and services on the market;

4.1.4. to withdraw consent to the processing of personal data;

4.1.5. appeal to the authorized body for the protection of the rights of Personal Data Subjects or in court against unlawful actions or inaction of the Operator in processing their personal data;

4.1.6. to exercise other rights provided by the legislation of the Russian Federation;

4.1.7. The User may at any time withdraw their consent to the processing of personal data by sending the Operator a notification via email to [info@comvex.ru](mailto:info@comvex.ru) with the note "Withdrawal of consent to the processing of personal data".

Upon receipt of such notification, the Operator ceases processing personal data in accordance with the requirements of Part 5 of Article 21 of the Personal Data Law (within 30 (thirty) calendar days).

4.2. Personal Data Subjects are obliged to:

4.2.1. provide the Operator with reliable information about themselves;

4.2.2. inform the Operator of the clarification (update, modification) of their personal data.

4.3. Persons who have transferred to the Operator unreliable information about themselves, or information about another Personal Data Subject without the latter's consent, bear responsibility in accordance with the legislation of the Russian Federation.

4.4. Control over the fulfillment of the requirements of this Policy is carried out by an authorized person responsible for organizing the processing of personal data at the Operator.

4.5. Responsibility for violation of the requirements of the legislation of the Russian Federation and regulatory acts of the Operator in the field of processing and protection of personal data is determined in accordance with the legislation of the Russian Federation.

## **5. List of Personal Data**

### **5.1. The Operator may process the following personal data of the Website User:**

- surname, first name, patronymic;
- telephone;
- email address;
- cookies;
- IP address of computer / mobile device (when visiting the Website).

The above data is hereinafter referred to in the text of the Policy by the general concept of "Personal Data". The delivery address is processed exclusively for the purposes of delivering the ordered Goods and is not used for marketing purposes without separate consent from the User.

5.2. Processing of special categories of personal data relating to racial, national origin, political views, religious or philosophical beliefs, intimate life is not carried out by the Operator.

Processing by the Operator of biometric personal data (information that characterizes the physiological and biological characteristics of a person, based on which their identity can be established) is not conducted by the Operator.

5.3. Processing of personal data authorized for distribution from among the special categories of personal data specified in Part 1 of Article 10 of the Personal Data Law is permitted if the prohibitions and conditions provided by Article 10.1 of the Personal Data Law are observed.

5.4. The User's consent to the processing of personal data authorized for distribution is executed separately from other consents to the processing of their personal data. In this case, the conditions provided, in particular, by Article 10.1 of the Personal Data Law are observed. Requirements for the content of consent to the processing of personal data authorized by the Personal Data Subject for distribution are approved by Order of Roskomnadzor No. 18 dated February 24, 2021.

5.4.1. Consent to the processing of personal data authorized for distribution is provided by the User to the Operator directly through the Website.

5.4.2. Transfer (distribution, provision, access) of personal data authorized by the Personal Data Subject for distribution must be stopped at any time at the request of the Personal Data Subject. This requirement must include the surname, first name, patronymic (if any), contact information (phone number, email address or postal address) of the Personal Data Subject, as well as a list of personal data whose processing is subject to termination. The personal data specified in this requirement may only be processed by the Operator to whom it is sent.

5.4.3. Consent to the processing of personal data authorized for distribution ceases to be valid from the moment the Operator receives the requirement specified in clause 5.4.2 of this Policy regarding the processing of personal data.

## **5.5. Logging and Documentation of User Consents**

### **5.5.1. Logging Process**

Each time a User registers for an event, subscribes to a newsletter, or fills out forms on the Website, when the User checks consent boxes, the Operator automatically registers (logs) the following information:

- a) IP address of the User's computer or mobile device;
- b) Exact date of consent provision;
- c) Exact time (hours, minutes, seconds) of consent provision;
- d) Version of this Policy (version number or date) with which the User agreed;
- e) Browser session identifier (session ID) for authenticity verification;
- f) Which specific checkboxes were set (for processing personal data, for receiving marketing messages, for receiving advertising via telecommunications networks, etc.);
- g) Event participant registration identifier or application number in the Operator's system.

This data is automatically recorded in a secure database without User participation.

### **5.5.2. Purpose of Logging**

Logging of consents is carried out for the purposes of:

- a) Documenting the fact of obtaining consent from the User;
- b) Compliance with the requirements of Federal Law No. 152-FZ "On Personal Data" and Federal Law No. 38-FZ "On Advertising";
- c) Proving voluntary and informed consent in case of disputes;

d) Protecting the rights of both the Operator and the User.

### **5.5.3. Storage Periods for Consent Evidence**

The Operator stores complete records of all User consents for at least 3 (three) years from the end of the consent validity period or the personal data processing periods, in accordance with the requirements of the current legislation of the Russian Federation (Order of Roskomnadzor No. 236-p dated September 10, 2019). After this period, records are deleted or archived.

### **5.5.4. User's Right to Obtain Information About Logging**

The User may request a copy of their consent logging by sending a letter to the Operator's email address or calling the phone number specified in Section 13 of this Policy. The request must contain the event participant registration identifier or application number in the system.

The Operator provides information about logging within 10 (ten) business days in accordance with the requirements of clause 10.13 of this Policy.

## **6. Principles of Personal Data Processing**

6.1. Processing of personal data is carried out on a legal basis.

6.2. Processing of personal data is limited to achieving specific, predetermined and legitimate purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not allowed.

6.3. Combining databases containing personal data, the processing of which is carried out for purposes incompatible with each other, is not allowed.

6.4. Only personal data that meets the purposes of their processing is subject to processing.

6.5. The content and scope of personal data processed correspond to the stated purposes of processing. Excessive personal data in relation to the stated purposes of their processing is not allowed.

6.6. When processing personal data, the accuracy of personal data, their sufficiency, and in necessary cases, relevance in relation to the purposes of personal data processing are ensured. The Operator takes necessary measures and/or ensures their adoption to remove or clarify incomplete or inaccurate data.

6.7. Storage of personal data is carried out in a form that allows determining the Personal Data Subject, no longer than required by the purposes of personal data processing, unless the storage period for personal data is established by federal law, an agreement to which the Personal Data Subject is a party, beneficiary or guarantor.

6.8. Processed personal data is destroyed or depersonalized in the case of:

- provision by the User of information confirming that personal data is illegally obtained or is not necessary for the stated purpose of processing - within 7 (seven) business days from the day of submission of such information (Part 1 of Article 14, Part 3 of Article 20 of the Personal Data Law);
- detection of unlawful processing of personal data - within 3 (three) business days (Part 3 of Article 21 of the Personal Data Law);
- withdrawal of personal data by the User - within 30 (thirty) calendar days (Part 5 of Article 21 of the Personal Data Law);

- achievement of the purpose of personal data processing - within 30 (thirty) days (Part 4 of Article 21 of the Personal Data Law);
- expiration of personal data storage periods - within 30 (thirty) days (Part 4 of Article 21 of the Personal Data Law).

6.9. Personal data that was processed by automated means is destroyed by the Operator by erasing from the database, formatting the media or by mechanical damage to hard disks.

Personal data that was processed by non-automated means is destroyed by the Operator by shredding (grinding).

Destruction of personal data is carried out on the basis of a decision of a special commission created by the Operator, and is executed by an Act on the destruction of personal data.

## **7. Purposes of Personal Data Processing**

7.1. Processing of personal data is limited to achieving specific, predetermined and legitimate purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not allowed.

### **7.1.1. Data Processing Purpose No. 1: Preparation, conclusion and execution of civil law contracts;**

- **list of personal data:** surname, first name, patronymic; year of birth; month of birth; date of birth; place of birth; gender; email address; residential address; registration address; phone number; SNILS; TIN; citizenship; identity document data; bank card details; current account number; personal account number; position;

- **categories of subjects whose personal data is processed:** counterparties; counterparty representatives; clients; beneficiaries under contracts; Website users;

- **list of actions:** collection; recording; systematization; accumulation; storage; clarification (update, modification); extraction; use; transfer (provision, access); depersonalization; blocking; deletion; destruction;

- **processing methods:** mixed; with transfer via the internal network of a legal entity; with transfer via the Internet;

- **processing period:** the period is determined in clause 10.6 of this Policy;

- personal data is destroyed by the methods specified in clause 6.9 of this Policy.

### **7.1.2. Data Processing Purpose No. 2: registration, collection and formation of information about counterparties (suppliers, contractors, contracting organizations, partners, clients), including collection and systematization of data, creation and maintenance of a counterparty database, verification of financial and legal reliability of counterparties, verification of contact information, maintenance of a counterparty register for the purposes of conclusion, execution, management of civil law contracts and control over the fulfillment of obligations by the parties;**

- **list of personal data:** surname, first name, patronymic, email address, phone number;

- **categories of subjects whose personal data is processed:** counterparties; counterparty representatives, exhibitors, exhibitor representatives; Website users;

- **list of actions:** collection; recording; systematization; accumulation; storage; clarification (update, modification); extraction; use; transfer (provision, access); depersonalization; blocking; deletion; destruction;

- **processing methods:** mixed; with transfer via the internal network of a legal entity; with transfer via the Internet;

- **processing period:** the period is determined in clause 10.6 of this Policy;

- personal data is destroyed by the methods specified in clause 6.9 of this Policy.

#### **7.1.3. Data Processing Purpose No. 3: Promotion of goods, works, services on the market;**

- **list of personal data:** surname, first name, patronymic; email address; phone number;

- **categories of subjects whose personal data is processed:**

counterparties; counterparty representatives; clients; beneficiaries under contracts; Website users;

- **list of actions:** collection; recording; systematization; accumulation; storage; clarification (update, modification); extraction; use; transfer (provision, access); depersonalization; blocking; deletion; destruction;

- **processing methods:** mixed; with transfer via the internal network of a legal entity; with transfer via the Internet;

- **processing period:** the period is determined in clause 10.6 of this Policy;

- personal data is destroyed by the methods specified in clause 6.9 of this Policy.

#### **7.1.4. Data Processing Purpose No. 4: organization, preparation and conduct of exhibition, congress and other business events, including:**

a) registration, accreditation and access control of event participants (exhibitors, exhibitor representatives, visitors, speakers, journalists);

b) collection and processing of information necessary for the preparation and conduct of events, including information about professional interests, companies, positions, experience and field of activity of participants;

c) direct contacts with personal data subjects via email, phone calls, SMS, messengers and other means of communication for the purpose of informing about:

- participation conditions, rules, technical regulations and event requirements;
- program, schedule, timetable and venue of the event;
- status of consideration of applications and registration forms;
- confirmation of participation and sending of tickets/passes;
- reminders about dates, times and venue of the event;
- changes in the program, schedule, speaker lineup and force majeure circumstances;
- collection of feedback, participant surveys, quality surveys of the event;
- sending event materials (program, schedule, participant list, conditions for access to materials);
- results and outcomes of the event, thanks to participants;
- offer to participate in future Operator events;

d) maintenance of a register and database of event participants, documentation of participation history in Operator events, analysis of participation for planning future events;

e) interaction with exhibitor representatives, including coordination of participation conditions and costs, technical and logistics requirements, stand space parameters, exposition placement rules;

f) ensuring security, protection and access control at the event, including entrance control, accreditation verification;

g) organizing networking and establishment of business contacts, including formation and provision to participants (with their consent) of lists of other participants, contact information and company information for the purpose of developing business connections and cooperation;

h) compilation of reports, analysis of event effectiveness, including preparation of attendance statistics, survey results, participant information;

- **list of personal data:** surname, first name, patronymic; year of birth; month of birth; date of birth; place of birth; gender; email address; residential address; registration address; phone number; SNILS; TIN; citizenship; identity document data; bank card details; current account number; personal account number; position; health information;

- **categories of subjects whose personal data is processed:** counterparties; counterparty representatives; clients; beneficiaries under contracts; event participants, including potential event participants, event guests; exhibitors, exhibitor representatives; Website users;

- **list of actions:** collection; recording; systematization; accumulation; storage; clarification (update, modification); extraction; use; transfer (provision, access); depersonalization; blocking; deletion; destruction;

- **processing methods:** mixed; with transfer via the internal network of a legal entity; with transfer via the Internet;

- **processing period:** the period is determined in clause 10.6 of this Policy;

- personal data is destroyed by the methods specified in clause 6.9 of this Policy.

**7.1.5. Data Processing Purpose No. 5: providing users with access to the Operator's Website services,** including:

a) processing requests received through feedback forms, event registration forms, newsletter subscription forms, service order forms and other web forms posted on websites;

b) providing access to information and materials posted on websites, including articles, news, exhibition participant catalogs, event programs, electronic versions of magazines, video materials, event archives;

c) user registration, creation and management of personal accounts on the Website, saving user settings and personalizing the interface;

d) placement and moderation of comments, reviews and other materials posted by users on websites;

e) ensuring the technical functioning of websites, protection against unauthorized access, fraud prevention and abuse;

f) operation with social network services included in the Social Networks Register according to Article 10.6 of Federal Law No. 149-FZ dated July 27, 2006 "On Information, Information Technologies and Information Protection", including integration of widgets, "Share" buttons, authorization through social networks, publication of content on social networks;

g) collection and analysis of data on website traffic, user behavior, viewing statistics using web analytics services (Yandex.Metrica and other analytics systems) for the purposes of improving website quality, increasing ease of use, identifying technical problems;

h) targeting and personalization of content based on user interests, visit history, professional affiliation;

i) processing of cookies, pixels and other tracking technologies for the purposes of technical functioning of websites, web analytics, remembering user settings, showing personalized content;

- **list of personal data:** surname, first name, patronymic; email address; phone number; position, cookies;

- **categories of subjects whose personal data is processed:** Website users; users of social networks included in the Social Networks Register according to Article 10.6 of Federal Law No. 149-FZ dated July 27, 2006 "On Information, Information Technologies and Information Protection";

- **list of actions:** collection; recording; systematization; accumulation; storage; clarification (update, modification); extraction; use; transfer (provision, access); depersonalization; blocking; deletion; destruction;

- **processing methods:** mixed; with transfer via the internal network of a legal entity; with transfer via the Internet;

- **processing period:** the period is determined in clause 10.6 of this Policy;

- personal data is destroyed by the methods specified in clause 6.9 of this Policy.

#### **7.1.6. Data Processing Purpose No. 6: sending advertising and marketing messages from the Operator via email, including mailings about special promotions, offers and Operator events;**

- **list of personal data:** surname, first name, patronymic; email address; phone number; cookies;

- **categories of subjects whose personal data is processed:**

Website users;

- **list of actions:** collection; recording; systematization; accumulation; storage; clarification (update, modification); extraction; use; transfer (provision, access); depersonalization; blocking; deletion; destruction;

- **processing methods:** mixed; with transfer via the internal network of a legal entity; with transfer via the Internet;

- **processing period:** the period is determined in clause 10.6 of this Policy;

- personal data is destroyed by the methods specified in clause 6.9 of this Policy.

#### **7.1.7. Data Processing Purpose No. 7: formation of reference materials for internal information support of the Operator's activities;**

- **list of personal data:** surname, first name, patronymic, year of birth, month of birth, date of birth, email address, phone number, position, other personal data (specific category is indicated); photograph, workplace information;

- **categories of subjects whose personal data is processed:** employees of organizations in contractual relations with the Operator (counterparty employees); Website users;

- **list of actions:** collection, recording, systematization, accumulation, storage, clarification (update, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction;

- **processing methods:** mixed; with transfer via the internal network of a legal entity; with transfer via the Internet;

- **processing period:** the period is determined in clause 10.6 of this Policy;

- personal data is destroyed by the methods specified in clause 6.9 of this Policy.

7.2. The Operator also has the right to send the User notifications about new products and services, special offers and various events. The User can always refuse to receive informational messages by sending the Operator a letter to the email address: [info@comvex.ru](mailto:info@comvex.ru), with the note "Refusal of notifications about new products and services and special offers".

### 7.2.1. Marketing and Advertising Messages

If the User has given separate consent to the processing of personal data for the purpose of promoting services (Article 15 of Federal Law No. 152) and consent to receive advertising via telecommunications networks (Article 18 of Federal Law No. 38), the Operator processes their personal data (full name, phone number, email) to send advertising and marketing information about:

- a) Upcoming COMvex exhibitions and events;
- b) Participation conditions and special offers for exhibitors and visitors;
- c) Business program, conferences and seminars within the exhibition;
- d) COMvex contests and promotions;
- e) New services and opportunities for exhibition participants;
- f) Partner events and construction industry news.

Such messages are sent through the following channels (at the Operator's choice):

- SMS messages to the phone number;
- Email letters to the email address;
- Messages on social networks (if the User is subscribed to the Operator's official accounts).

The User may at any time refuse such messages in accordance with the terms of this Policy (Section 10.16). Refusal of advertising messages does not affect the possibility of receiving the Operator's services.

The Operator does not send marketing messages to Users who have not given consent or have unsubscribed from them.

7.3. Depersonalized User data collected using Internet statistics services is used to collect information about User actions on the Website, improve the quality of the Website and its content.

7.4. The content and scope of personal data processed must correspond to the stated processing purposes provided in clause 7.1 of this Policy. Processed personal data should not be excessive in relation to the stated purposes of their processing.

7.5. It is prohibited to refuse data processing (service) if the Personal Data Subject refuses to provide biometric personal data and (or) give consent to the processing of personal data, if in accordance with federal law, obtaining consent from the Operator to process personal data is not mandatory.

## **8. Legal Grounds for Personal Data Processing**

8.1. The legal basis for processing personal data is a set of regulatory legal acts, in execution of which and in accordance with which the Operator processes personal data, including:

- Constitution of the Russian Federation;
- Civil Code of the Russian Federation;
- Labor Code of the Russian Federation;
- Tax Code of the Russian Federation;
- Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data";
- Federal Law No. 149-FZ dated July 27, 2006 "On Information, Information Technologies and Information Protection";
- Federal Law No. 38-FZ dated March 13, 2006 "On Advertising" (in particular, Article 18 on informational messages by consent);
- "Requirements for the protection of personal data during their processing in personal data information systems", approved by Resolution of the Government of the Russian Federation No. 1119 dated November 1, 2012;
- local acts of the Operator;
- other regulatory legal acts regulating the Operator's activities;
- agreements concluded between the Operator and Personal Data Subjects;
- consent of the Personal Data Subject to the processing of their personal data.

## **9. Conditions for Personal Data Processing**

9.1. Processing of personal data is carried out with the consent of the Personal Data Subject to the processing of their personal data.

9.2. Processing of personal data is necessary to achieve the purposes provided by an international treaty of the Russian Federation or law, to exercise the functions, powers and obligations assigned to the Operator by the legislation of the Russian Federation.

9.3. Processing of personal data is necessary for the execution of an agreement to which the Personal Data Subject is a party or beneficiary, 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.

9.4. Processing of personal data is necessary to exercise the rights and legitimate interests of the Operator or third parties or to achieve socially significant purposes, provided that the rights and freedoms of the Personal Data Subject are not violated.

9.5. The Operator processes personal data to which access by an unlimited number of persons is provided by the Personal Data Subject or at their request (hereinafter referred to as "Publicly Available Personal Data").

9.6. Processing of personal data subject to publication or mandatory disclosure in accordance with federal law is carried out.

## **10. Procedure for Collection, Storage, Transfer and Other Types of Personal Data Processing**

10.1. The Operator takes necessary legal, organizational and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, distribution and other unauthorized actions, including:

- determines threats to the security of personal data during their processing;
- adopts local regulatory acts and other documents regulating relations in the field of processing and protection of personal data.

Local acts of the Operator may not include provisions that limit the rights of the Personal Data Subject;

- appoints persons responsible for ensuring the security of personal data in structural divisions and information systems of the Operator;
- creates necessary conditions for working with personal data;
- organizes accounting of documents containing personal data;
- organizes work with information systems in which personal data is processed;
- stores personal data in conditions that ensure their safety and exclude unauthorized access to them;
- organizes internal control and (or) audit activities for compliance of personal data processing with the Personal Data Law and regulatory legal acts adopted in accordance with it, requirements for the protection of personal data, the Operator's policy regarding the processing of personal data, local regulatory acts of the Operator;
- determines the assessment of harm that may be caused to Personal Data Subjects in case of violation of rules for working with personal data, the ratio of the specified harm and measures taken by the Operator aimed at ensuring the fulfillment of obligations provided by the Personal Data Law;
- organizes familiarization of employees directly conducting personal data processing with the provisions of the legislation of the Russian Federation on personal data, including requirements for the protection of personal data, documents defining the Operator's policy regarding the processing of personal data, local acts on personal data processing issues, and (or) training of the specified employees;
- notifies Roskomnadzor of unlawful personal data breaches that resulted in violation of the rights of Personal Data Subjects, of alleged causes, harm, results of its investigation, measures to eliminate consequences;
- ensures interaction with the state system for detecting, preventing and eliminating the consequences of computer attacks on information resources of the Russian Federation, including informing Roskomnadzor of computer incidents that resulted in unlawful transfer (provision, distribution, access) of personal data.

10.2. The security of personal data processed by the Operator is ensured by implementing legal, organizational and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.

10.3. The Operator ensures the safety of personal data and takes all possible measures to exclude access to personal data by unauthorized persons.

10.4. Personal data of the User will never, under any circumstances, be transferred to third parties, except in cases related to the execution of current legislation or in case the Personal Data Subject has given consent to the Operator to transfer data to a third party for the execution of obligations under a civil law contract.

10.5. In case of detection of inaccuracies in personal data, the User can update them independently by sending the Operator a notification to the Operator's email address: [info@comvex.ru](mailto:info@comvex.ru), with the subject "Update of personal data".

In case of detection of inaccurate personal data upon request of the Personal Data Subject or their representative, or upon their request or upon request of Roskomnadzor, the Operator blocks personal data relating to this Subject from the moment of such request or receipt of the specified request for the period of verification, if blocking of personal data does not violate the rights and legitimate interests of the Personal Data Subject or third parties.

In case of confirmation of the fact of inaccuracy of personal data, the Operator clarifies personal data on the basis of information provided by the Personal Data Subject or their representative or by Roskomnadzor, or other necessary documents within seven business days from the day of submission of such information and removes the blocking of personal data.

10.6. The period of personal data processing is determined by the achievement of the purposes for which personal data was collected, unless another period is provided by an agreement or current legislation. The User may at any time withdraw their consent to the processing of personal data by sending the Operator a notification via email to the Operator's email address: [info@comvex.ru](mailto:info@comvex.ru), with the subject "Withdrawal of consent to the processing of personal data".

10.7. All information collected by third-party services, including payment systems, communication means and other service providers, is stored and processed by the specified persons (Operators) in accordance with the Privacy Policy. The Personal Data Subject and/or User is obliged to independently and timely familiarize themselves with the specified documents. The Operator is not responsible for the actions of third parties, including the service providers specified in this clause.

10.8. Prohibitions established by the Personal Data Subject on transfer (except for providing access), as well as on processing or processing conditions (except for obtaining access) of personal data authorized 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.

Transfer of personal data to inquiry and investigation bodies, to the Federal Tax Service, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation and other authorized executive bodies and organizations is carried out in accordance with the requirements of the legislation of the Russian Federation.

10.9. The Operator ensures the confidentiality of personal data when processing personal data.

10.10. The Operator stores personal data in a form that allows determining the Personal Data Subject, no longer than required by the purposes of personal data processing, unless the storage period for personal data is established by federal law, an agreement to which the Personal Data Subject is a party, beneficiary or guarantor. When collecting personal data, including via the Internet, the Operator ensures recording, systematization, accumulation, storage, clarification (update, modification), extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except in cases specified in the Personal Data Law.

10.11. Conditions for terminating the processing of personal data may be the achievement of the purposes of personal data processing, expiration of the consent of the Personal Data Subject or withdrawal of consent by the Personal Data Subject, as well as detection of unlawful processing of personal data.

10.12. Cross-border Transfer of Personal Data.

The Operator does not carry out cross-border transfer of personal data.

10.13. Confirmation of the fact of personal data processing by the Operator, legal grounds and purposes of personal data processing, as well as other information specified in Part 7 of Article 14 of the Personal Data Law, is provided by the Operator to the Personal Data Subject or their representative upon request or upon receipt of a request from the Personal Data Subject or their representative. The Operator's response to the Subject's request (appeal) to provide information regarding the processing of their personal data must be given within ten business days from the date of the request or receipt by the Operator of the request from the Personal Data Subject or their representative. This period may be extended, but not more than five business days in case of sending a reasoned notification with an indication of the reasons for extending the period for providing the requested information to the Personal Data Subject by the Operator. The response to the request is given in the form in which the request (appeal) was sent, or in the form specified in the request (appeal) itself.

The information provided does not include personal data relating to other Personal Data Subjects, except in cases where there are legal grounds for disclosing such personal data.

The request must contain:

- the number of the main document certifying the identity of the Personal Data Subject or their representative, information about the date of issue of the specified document and the body that issued it;
- information confirming the participation of the Personal Data Subject in relations with the Operator (contract number, date of conclusion of the contract, conditional verbal designation and (or) other information), or information otherwise confirming the fact of personal data processing by the Operator;
- signature of the Personal Data Subject or their representative.

The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

If the request (appeal) of the Personal Data Subject does not reflect all necessary information in accordance with the requirements of the Personal Data Law or the Subject does not have access rights to the requested information, then a reasoned refusal is sent to them.

The right of the Personal Data Subject to access their personal data may be limited in accordance with Part 8 of Article 14 of the Personal Data Law, including if the Personal Data Subject's access to their personal data violates the rights and legitimate interests of third parties.

10.14. In case of detection of unlawful processing of personal data upon request (appeal) of the Personal Data Subject or their representative or Roskomnadzor, the Operator blocks unlawfully processed personal data relating to this Subject from the moment of such request or receipt of the request.

10.15. Upon achievement of the purposes of personal data processing, as well as in case of withdrawal by the Personal Data Subject of consent to their processing, personal data is subject to destruction, if:

- otherwise not provided by an agreement to which the Personal Data Subject is a party, beneficiary or guarantor;
- the Operator does not have the right to process without the consent of the Personal Data Subject on the grounds provided by the Personal Data Law or other federal laws;
- otherwise not provided by another agreement between the Operator and the Personal Data Subject.

#### 10.16. Data Processing upon Withdrawal of Consent to Marketing Messages

10.16.1. If the User has unsubscribed from advertising messages or withdrawn consent to marketing processing:

- The Operator immediately (within 1 calendar day) ceases sending advertising and marketing messages;
- The User's phone number and email are added to the marketing block list;
- Personal data is retained for the purposes of:
  - Execution of contracts for the provision of services for organizing participation in exhibition events (for the required period);
  - Sending informational and service messages about event participation, application status, tickets and passes;
  - Maintaining accounting and tax reporting (in accordance with the Tax Code of the Russian Federation);
  - Fulfillment of other obligations provided by the legislation of the Russian Federation;
- Personal data is deleted in accordance with clauses 6.8 and 10.15 of this Policy upon achievement of the storage purposes determined by the agreement or legislation.

#### 10.16.2. Re-consent to Marketing

If the User subsequently wishes to receive marketing messages again, they must:

- Explicitly give consent (check the appropriate consent checkbox when registering for an event or subscribing to a newsletter)
- Or send a letter to the Operator's email address with a request to subscribe them to the newsletter.

#### 10.17. Transfer of Personal Data to Third Parties

The Operator transfers User personal data to the following categories of partners:

Processing Purpose	Partner (Category)	Transfer Purpose	Address
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<p>Organization of exhibition events</p>	<p>Event venue (Crocus Expo IEC), exhibition organizing partners, event support contractors. The Operator transfers personal data to the specified persons who are independent operators and process data for their own purposes. Transfer is carried out with the consent of the personal data subject.</p>	<p>Ensuring participant access to the exhibition, access control, stand organization, technical event support</p>	<p>Specified on Partners' Websites</p>
<p>Registration and accreditation of participants</p>	<p>Participant registration partners, event management systems (CRM systems for events)</p>	<p>Registration of exhibitors and visitors, badge processing, processing of participation applications</p>	<p>Based on agency agreements. The Operator entrusts the processing of personal data to the specified persons on the basis of an agency agreement (Part 3 of Article 6 of Federal Law No. 152). The Operator is responsible for the actions of these persons.</p>
<p>Payment processing</p>	<p>Banks and payment systems (bank cards, acquiring systems, electronic payment services). The Operator transfers personal data to the specified persons who are independent operators and process data for their own purposes. Transfer is carried out with the consent of the personal data subject.</p>	<p>Accepting payments for exhibition participation, invoice processing, processing payment orders</p>	<p>Specified on partner websites</p>
<p>Request processing and support</p>	<p>Call centers and partners for technical and information support of event participants</p>	<p>Processing participant requests and appeals, consulting on exhibition participation issues</p>	<p>Based on agency agreements. The Operator entrusts the processing of personal data to the specified persons on the basis of an agency agreement (Part 3 of Article 6 of Federal Law No. 152). The Operator is responsible for the actions of these persons.</p>

Statistics and analytics	Analytics systems (Yandex.Metrica, Yandex Cloud, web analytics systems). The Operator transfers personal data to the specified persons who are independent operators and process data for their own purposes. Transfer is carried out with the consent of the personal data subject.	Website traffic analysis, user behavior analysis, service improvement, protection against automated requests	Specified on partner websites
Website administration and support	Hosting providers, system administrators, information system developers	Development, administration and technical support of the Website and Operator services	Based on agency agreements. The Operator entrusts the processing of personal data to the specified persons on the basis of an agency agreement (Part 3 of Article 6 of Federal Law No. 152). The Operator is responsible for the actions of these persons.
Marketing and event promotion	Email mailing services, SMS services, marketing campaign management systems	Sending marketing messages to participants (with consent), informing about events	Based on agency agreements. The Operator entrusts the processing of personal data to the specified persons on the basis of an agency agreement (Part 3 of Article 6 of Federal Law No. 152). The Operator is responsible for the actions of these persons.

Each of these companies has its own Privacy Policy, which the User can read on their official Websites.

Transfer and entrusting of personal data processing to third parties is carried out with the consent of the personal data subject, obtained in accordance with the requirements of Article 9 of Federal Law No. 152. Consent is executed by a separate document when registering for an event, subscribing to a newsletter or concluding a service agreement.

The Personal Data Subject has the right at any time to withdraw consent to the transfer of personal data to third parties by sending a request in accordance with Section 13 of this Policy. Upon withdrawal of consent, the Operator ceases transferring data, except in cases where the transfer is necessary for the execution of a contract or is required by law.

## **11. Cookie Files**

11.1. Cookie collection and processing technology is used on the Operator's Website.

11.2. Except in cases specified in this Policy regarding confidentiality and cookies, the cookies used by the Operator are necessary for the functionality and performance of the Website; these functional and/or operational cookies will be deleted from the Personal Data Subject's device upon completion of the browser session (session cookies).

11.3. The Operator uses cookies to personalize the Website's capabilities and possibly show appropriate advertising. The Operator uses cookies and similar technologies, including mobile device identifiers, to identify Personal Data Subjects, improve the user experience with the Website, increase security and possibly show advertising.

11.4. When first visiting the Website, the Operator invites the Personal Data Subject to familiarize themselves with and accept the Personal Data Processing and Cookie Processing Policy.

11.5. The Operator uses in-session tracking technologies and persistent tracking technologies. Tracking technologies (for example, cookies) can be persistent (that is, they remain on the Personal Data Subject's computer until they delete them) or temporary (i.e., they remain until the Personal Data Subject closes the browser).

11.6. Mandatory Cookies — necessary for the normal functioning of the Website. The Operator may use mandatory cookies to authenticate Personal Data Subjects, prevent fraudulent use of the Website, or provide certain Website functions.

11.7. Analytical and Operational Cookies — allow the Operator to recognize Personal Data Subjects, and also track their transitions to the Website, helping to improve the Website's operation.

11.8. Functional Cookies — used to recognize repeat visits to the Website. They allow personalizing the Website content for Personal Data Subjects, addressing them by name and saving selected settings (for example, language or region).

11.9. Targeting Cookies — track the process of using the Website, opened pages and links used.

11.10. Cookies may be used for:

- Customizing web page content of the Website in accordance with the preferences of Personal Data Subjects, as well as for recognizing Personal Data Subjects;
- Creating statistics that help understand exactly how Personal Data Subjects use the Website;
- Maintaining the Personal Data Subject's session.

11.11. Disabling and/or blocking by the Personal Data Subject of the web browser option for accepting data from cookies means that the use of the Website by the Personal Data Subject may be limited, in particular, some of its functions.

## **12. List of Actions Performed by the Operator with Obtained Personal Data**

12.1. The Operator carries out automated collection, recording, systematization, accumulation, storage, clarification (update, modification), extraction, use; transfer (provision, access); depersonalization; blocking; deletion; destruction.

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

### **13. Final Provisions**

13.1. The User can receive any clarifications on questions of interest regarding the processing of their personal data, refusal of advertising messages or other issues by contacting the Operator in the following ways:

METHOD 1: Email

Message to [info@comvex.ru](mailto:info@comvex.ru)

Subject line: "Question about personal data" or corresponding issue.

METHOD 2: Phone call to manager

Phone: +7 (495) 120-37-87

Reception time: 10:00-19:00 Moscow time (MSK)

Working days: Monday-Friday (except official public holidays of the Russian Federation).

Response to the letter is sent within 3 business days.

When calling, the response is received immediately during the conversation.

13.2. This document will reflect any changes to the Operator's Personal Data Processing Policy. The Operator has the right to make changes to this Privacy Policy without the User's consent. The new Privacy Policy comes into force from the moment it is posted on the Website, unless otherwise provided by the new version of the Policy. The Policy is valid indefinitely until it is replaced by a new version.

13.3. The current version of the Policy is located on the Website at: [www.comvex.ru](http://www.comvex.ru), and is available to the User for review.

### **13.4. Information about the Operator:**

LIMITED LIABILITY COMPANY "SIGMA EXPO GROUP" (TIN: 7743378236, PSRN 1227700183215, address: 125504, MOSCOW, INT.TER. MUNICIPAL DISTRICT ZAPADNOYE DEGUNINO, DMITROVSKOYE SHOSSE, 71B, FLOOR, ROOM 6, 4/6, registration number in the Register of Personal Data Operators No. 77-22-085505, email: [info@sigma-expo.ru](mailto:info@sigma-expo.ru).)