

# PRIVACY AND PERSONAL DATA PROCESSING POLICY

for centerlab.pro

## 1. General Provisions

This Policy sets out the procedure for processing the personal data of users of <https://centerlab.pro/>, the measures taken to protect such data, the procedure for using cookies and information about analytics services.

This Policy has been prepared in accordance with Federal Law No. 152-FZ of July 27, 2006, "On Personal Data", the Civil Code of the Russian Federation and other applicable laws and regulations of the Russian Federation.

Certain user actions on the Website, including submitting forms, subscribing to the newsletter, submitting a CV and consenting to optional cookies, require the user's separate consent.

## 2. Terms and Definitions

Personal data means any information relating directly or indirectly to an identified or identifiable individual. Personal data authorised by the personal data subject for public dissemination means personal data to which the personal data subject has granted access to an unlimited number of persons by giving consent to the processing of personal data authorised for dissemination in accordance with the procedure established by Federal Law No. 152-FZ.

Operator means a person that, independently or jointly with other persons, organises and/or carries out the processing of personal data and determines the purposes of processing, the scope of the data and the operations performed on it.

Personal data processing means any operation or set of operations performed on personal data, with or without automated means, including collection, recording, systematisation, accumulation, storage, correction (updating or amendment), retrieval, use, transfer (dissemination, provision or access), anonymisation, blocking, deletion and destruction.

User means any person who visits the Website or uses forms available on the Website.

Cookies means data files and other similar technologies stored in the user's browser or device to support Website operation and analytics and to save user preferences.

## 3. Details of the Personal Data Operator

|                            |                                                                                                                 |
|----------------------------|-----------------------------------------------------------------------------------------------------------------|
| Full legal name            | Limited Liability Company "CENTER LAB"                                                                          |
| Abbreviated name           | LLC "CENTER LAB"                                                                                                |
| Website                    | <a href="https://centerlab.pro/">https://centerlab.pro/</a>                                                     |
| Email                      | <a href="mailto:welcome@centerlab.pro">welcome@centerlab.pro</a>                                                |
| Telephone                  | +7 (495) 445-03-82                                                                                              |
| Registered address         | Room 1, Office 14, 21 Bolshaya Molchanovka Street, Arbat Municipal District, Moscow, Russian Federation, 121069 |
| Operating / postal address | Office 14, 6th Floor, 21 Bolshaya Molchanovka Street, Moscow, Russian Federation, 121069                        |
| INN / KPP                  | 9704058910 / 770401001                                                                                          |
| OGRN                       | 1217700164560                                                                                                   |
| Chief Executive Officer    | Ketevan Revazovna Khelaia                                                                                       |

## 4. Categories of Personal Data Subjects

The Operator processes the personal data of the following categories of subjects: Website visitors; persons who complete the "Tell Us About Your Project" form; newsletter subscribers; applicants who submit a CV through the "Join Our Team" form; representatives of clients, partners, contractors and prospective counterparties; members of the media and professional community; and participants in the Operator's events, competitions, studies and other projects where the relevant forms are available on the Website.

## **5. Categories and Types of Personal Data Processed**

Depending on the Website service used, the Operator may process the following data: surname, first name and patronymic; email address; telephone number; organisation name; job title; city, region or country; content of the enquiry; information about a task or project; CV and information contained in attached files; and technical data concerning the Website visit, including IP address, browser, device and operating system information, referral source, actions taken on the Website and cookie identifiers.

The Operator does not request special categories of personal data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, health or private life, except where such processing is covered by a separate form and the subject's written consent. Applicants are advised not to include unnecessary special-category personal data in their CVs.

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

- ensuring the operation of the Website;
- processing user enquiries and applications submitted through the "Tell Us About Your Project" form;
- communicating in relation to the Operator's services, projects, studies, competitions and special projects;
- administering and distributing the newsletter;
- reviewing CVs and communicating with applicants;
- entering into and performing contracts;
- organising events, competitions, studies and other projects;
- improving the structure, content and security of the Website;
- maintaining Website traffic statistics;
- complying with obligations imposed by the laws of the Russian Federation.

## **7. Legal Bases for Personal Data Processing**

The legal bases for processing are the personal data subject's consent; the need to enter into or perform a contract; the pursuit of the Operator's rights and legitimate interests, provided that the rights and freedoms of the personal data subject are not infringed; compliance with the laws of the Russian Federation; and other grounds provided for by Federal Law No. 152-FZ of July 27, 2006, "On Personal Data".

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

Personal data is processed lawfully and fairly; processing is limited to specific, predetermined and lawful purposes; processing incompatible with the purposes of collection is prohibited; excessive data collection is prohibited; the accuracy, sufficiency and relevance of data are maintained; and data is retained no longer than required by the purposes of processing or by law.

## **9. Procedure for Collecting Personal Data on the Website**

Personal data is provided voluntarily by the user when completing Website forms, subscribing to the newsletter, sending messages by email, attaching a CV or otherwise interacting with the Operator.

Website forms use separate, unticked consent checkboxes. Consent to personal data processing is obtained separately from the User Agreement, Website terms, newsletter consent and consent to optional cookies.

## **10. Cookies and Analytics Services**

The Website uses essential cookies required for its proper and secure operation, as well as analytics cookies where the user has given consent.

The Russian analytics service Yandex Metrika is used on the Website after the user has given consent. Information about the service is provided in this Policy, the cookie banner and the user's consent settings.

The Website does not use foreign tracking or analytics services, including Google Analytics, Meta Pixel or similar services.

## **11. Personal Data Processing and Retention Periods**

Personal data is processed until the purposes of processing have been achieved, the subject withdraws consent or the period prescribed by the laws of the Russian Federation expires.

Newsletter subscriber data is processed until the user unsubscribes, withdraws consent or the Operator discontinues the newsletter. Data submitted by applicants is processed during the review of the application and for a reasonable subsequent period for possible communication, unless another period is specified by separate consent, contract or law.

Technical data and cookies are retained for the lifetime of the relevant cookies and for the periods required to protect the Website and maintain statistics.

## **12. Database Storage and Localisation**

When personal data of citizens of the Russian Federation is collected through the Website, the recording, systematisation, accumulation, storage, correction and retrieval of such data are performed using databases located in the Russian Federation, except where expressly permitted by the laws of the Russian Federation.

The Operator must monitor the location of the Website, CRM system, feedback forms, email services, analytics services, CV storage and other information systems used to process personal data.

## **13. Disclosure of Personal Data to Third Parties and Outsourced Processing**

The Operator transfers personal data to third parties and grants third parties access to personal data only where there is consent from the personal data subject, a contract with the personal data subject, a data-processing instruction or another lawful basis.

The Operator appoints contractors and service providers to process personal data only to the extent necessary to achieve the stated purposes. Such parties may include the hosting provider, Website developers, technical support providers, the newsletter service, the CRM provider, event-support contractors and other parties engaged by the Operator.

The appointment to process personal data is documented in a contract or separate instruction specifying the categories of personal data, purposes of processing, operations performed on the data, and requirements concerning confidentiality, security, data localisation and incident notification. The transfer of personal data for newsletter distribution is addressed in a separate consent to personal data processing for newsletter subscription.

## **14. Cross-Border Transfers of Personal Data**

The Operator does not transfer personal data across borders as part of the Website's standard operation.

A cross-border transfer of personal data may take place only after the Operator has complied with Article 12 of Federal Law No. 152-FZ, including assessment of the receiving party and notification of the competent authority, where required by law.

## **15. Rights of Personal Data Subjects**

A personal data subject has the right to obtain information about the processing of their data; require the correction, blocking or destruction of data that is incomplete, outdated, inaccurate, unlawfully obtained or excessive; withdraw consent; require processing to cease; challenge the Operator's actions or inaction before the competent authority or a court; and exercise other rights provided by law.

## **16. Procedure for Submitting Requests and Withdrawing Consent**

Requests, demands and notices withdrawing consent may be sent to [welcome@centerlab.pro](mailto:welcome@centerlab.pro) or to the Operator's postal address: Office 14, 6th Floor, 21 Bolshaya Molchanovka Street, Moscow, Russian Federation, 121069.

The request must state the subject's surname, first name and patronymic, contact details, information confirming their interaction with the Operator, and the substance of the request.

The Operator provides the personal data subject with the information required by the Personal Data Law within 10 business days of receiving the enquiry or request. This period may be extended by no more than five business days if the subject is sent a reasoned notice explaining the grounds for the extension.

The Operator makes the necessary amendments to incomplete, inaccurate or outdated personal data within seven business days after supporting information is provided. The Operator destroys personal data that was obtained

unlawfully or is no longer required for the stated purpose within seven business days after supporting information is provided.

The Operator ceases processing personal data at the subject's request within 10 business days of receiving the request, unless there are lawful grounds for continuing the processing. This period may be extended by no more than five business days if the subject is sent a reasoned notice.

#### **17. Personal Data Security Measures**

The Operator takes the necessary legal, organisational and technical measures to protect personal data against unlawful or accidental access, destruction, alteration, blocking, copying, provision, dissemination and other unlawful actions.

These measures include appointing a responsible person; restricting access; using secure communication channels and passwords; creating backups; managing access rights; recording incidents; imposing contractual obligations on contractors; and familiarising employees with legal requirements and internal policies.

#### **18. Data Blocking and Destruction, Incidents and Final Provisions**

Where unlawful personal data processing is identified, the Operator takes measures to block the data, cease processing, correct or destroy the data in accordance with the procedures and time limits established by law.

Where an incident results in the unlawful or accidental transfer, provision, dissemination of or access to personal data, the Operator conducts an internal investigation and notifies the competent authority in the cases and within the time limits prescribed by Federal Law No. 152-FZ of July 27, 2006, "On Personal Data".

The Operator may amend this Policy. The current version is published at <https://centerlab.pro/> and is accessible from the footer of every Website page.