PERSONAL DATA PROCESSING POLICY

VERSION 1.1.

APPROVED 10.01.2024

1. GENERAL PROVISIONS

This policy of personal data processing is drawn up in accordance with the requirements of the Federal Law dated 27.07.2006. No. 152-FZ "On Personal Data" (hereinafter - the **Personal Data Law**) and defines the procedure of personal data processing and measures taken by the company to ensure personal data security **Limited Liability Company "SQALab"**

(hereinafter referred to as the **Operator**) in order to protect the rights and freedoms of individuals and citizens during the processing of their personal data, including the protection of the rights to privacy, personal and family secrecy.

2. BASIC CONCEPTS USED IN THE POLICY

2.1. Automated processing of personal data - processing of personal data with the help of computer facilities.

2.2. Blocking of personal data - temporary cessation of personal data processing (except for cases when processing is necessary to clarify personal data).

2.3. Website - a set of graphic and informational materials, as well as computer programmes and databases, ensuring their availability on the Internet.

2.4. Operator's websites - list of information resources httpshttps://sqadays.comsqadays.com, https://analystdays.ru, https://techwriterdays.ru, https://it-conf.ru, https://secrus.org, https://sqadays.eu, https://analystdays.eu , as well as the list of domain names from which redirects to the above resources https://sqadays.ru, https://sqaday.ru, https://analystdays.com, https://it-conf.com, https://techwriterdays.com, https://twdays.ru.

2.5. Personal data information system - a set of personal data contained in databases and information technologies and technical means ensuring their processing.

2.6. Impersonalisation of personal data - actions as a result of which it is impossible to determine, without using additional information, whether personal data belong to a particular subject of personal data.

2.7. Processing of personal data - any action (operation) or set of actions (operations) performed with or without the use of automation means with personal data, including collection, recording, systematisation, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalisation, blocking, deletion, destruction of personal data.

2.8. Operator - a state authority, municipal authority, legal or natural person, independently or jointly with other persons organising and (or) carrying out processing of personal data, as well as determining the purposes of personal data processing, composition of personal data subject to

processing, actions (operations) performed with personal data.

2.9. Personal data - any information relating directly or indirectly to a certain or definable natural person (subject of personal data).

2.10. Personal data authorised by the data subject for dissemination - personal data, access to which is granted to an unlimited number of persons by the personal data subject by giving consent to the processing of personal data authorised by the personal data subject for dissemination in the manner prescribed by the Personal Data Law (hereinafter - personal data authorised for dissemination).

2.11. User - any visitor of the Operator's websites.

2.12. Provision of personal data - actions aimed at disclosure of personal data to a certain person or a certain circle of persons.

2.13. Dissemination of personal data - any actions aimed at disclosure of personal data to an indefinite number of persons (transfer of personal data) or at familiarisation of personal data to an unlimited number of persons, including disclosure of personal data in mass media, placement in information and telecommunication networks or providing access to personal data in any other way.

2.14. Cross-border transfer of personal data - transfer of personal data to the territory of a foreign country to a foreign government authority, a foreign individual or a foreign legal entity.

2.15. Destruction of personal data - any actions, as a result of which personal data are irretrievably destroyed with the impossibility of further recovery of the content of personal data in the information system of personal data and (or) material carriers of personal data are destroyed.

The Operator is obliged to publish or otherwise provide unrestricted access to this Personal Data Processing Policy in accordance with part 2 of Article 18.1 of the FZ-152.

3. BASIC RIGHTS AND OBLIGATIONS OF THE OPERATOR

3.1. The operator has the right to:

3.1.1. To receive from the subject of personal data reliable information and/or documents containing personal data;

3.1.2. If the personal data subject withdraws 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;

3.1.3. To independently determine the composition and list of measures necessary and sufficient to ensure the fulfilment of obligations stipulated by the Personal Data Law and the 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 obligated to:

3.2.1. Provide the personal data subject, upon his/her request, with information regarding the processing of his/her personal data;

3.2.2. Organise the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;

3.2.3. To respond to appeals and requests of personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;

3.2.4. To inform the authorised body for the protection of the rights of personal data subjects, upon request of this body, of the necessary information within 30 days from the date of receipt of such request;

3.2.5. Publish or otherwise provide unrestricted access to this Personal Data Processing Policy;

3.2.6. To take legal, organisational and technical measures to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unlawful actions in relation to personal data;

3.2.7. To stop transfer (distribution, provision, access) of personal data, stop processing and destroy personal data in the manner and cases stipulated by the Personal Data Law;

3.2.8. To fulfil other obligations stipulated 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 his/her personal data, except for cases stipulated by federal laws. Information shall be provided to the subject of personal data by the Operator in an accessible form and shall not contain personal data relating to other subjects of personal data, unless there are legal grounds for disclosure of such personal data. The list of information and the procedure for obtaining it is established by the Law on Personal Data;

4.1.2. To demand from the operator to clarify his personal data, block or destroy them in case the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, as well as to take measures provided for by law to protect his rights;

4.1.3. To impose a condition of prior consent when processing personal data for the purpose of marketing goods, works and services;

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

4.1.5. To appeal to the authorised body for the protection of the rights of personal data subjects or in court against unlawful acts or omissions of the Operator in the processing of his/her personal data;

4.1.6. To exercise other rights provided for by the legislation of the Russian Federation.

4.2. Personal data subjects are obliged to:

4.2.1. Provide the Operator with true data about yourself;

4.2.2. To notify the Operator about clarification (update, change) of his/her personal data.

4.3. Persons who have passed to the Operator false information about themselves, or information about another subject of personal data without the consent of the latter, shall be liable in accordance with the legislation of the Russian Federation.

5. THE OPERATOR MAY PROCESS THE FOLLOWING PERSONAL DATA OF THE USER

5.1. Surname, first name, patronymic

5.2. Email address

5.3. Phone numbers

5.4. Position

5.5. Place of work

5.6. Profiles in social networks and messengers

5.7. A photo or avatar.

5.8. Biography

5.9. The Operator's websites also collect and process anonymised visitor data (including cookies) using Internet statistics services (Yandex Metrica).

5.10. The aforementioned data are hereinafter in the text of the Policy united by the general term **Personal Data**.

5.11. The Operator does not process special categories of personal data concerning race, nationality, political opinions, religious or philosophical beliefs, intimate life.

5.12. Processing of personal data authorised for dissemination from among the special categories of personal data specified in Article 10.1 of the Law on Personal Data is allowed if the prohibitions and conditions provided for in Article 10.1 of the Law on Personal Data are complied with.

5.13. The User's consent to the processing of personal data authorised for dissemination is executed separately from other consents to the processing of his/her personal data. In this case, the conditions stipulated, in particular, by Art. 10.1 of the Law on Personal Data are observed. The requirements for the content of such consent are established by the authorised body for the protection of the rights of personal data subjects.

5.13.1. The User gives consent to the processing of personal data authorised for dissemination to the

Operator directly.

5.13.2. The Operator is obliged to publish information on the conditions of processing, prohibitions and conditions for processing by an unlimited number of persons of personal data authorised for dissemination within three working days from the receipt of the said consent of the User.

5.13.3. The transfer (dissemination, provision, access) of personal data authorised by the subject of personal data for dissemination shall be stopped at any time at the request of the subject of personal data. This request shall include the surname, first name, patronymic (if any), contact information (telephone number, e-mail address or postal address) of the subject of personal data, as well as a list of personal data whose processing is subject to termination. The personal data specified in this request may be processed only by the Operator to whom it is sent.

5.13.4. Consent to the processing of personal data authorised for dissemination shall terminate upon receipt by the Operator of the request specified in clause 5.12.3 of this Policy on Personal Data Processing.

6. PRINCIPLES AND CONDITIONS OF PERSONAL DATA PROCESSING

6.1. Processing of personal data is carried out on a lawful and fair basis.

6.2. The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data incompatible with the purposes of personal data collection is not allowed.

6.3. Databases containing personal data processed for incompatible purposes may not be merged.

6.4. Only personal data that fulfils the purposes for which it is processed will be processed.

6.5. The content and scope of processed personal data correspond to the stated purposes of processing. The processed personal data may not be redundant in relation to the stated purposes of their processing.

6.6. When processing personal data, the accuracy of personal data, their sufficiency and, where necessary, relevance in relation to the purposes of personal data processing is ensured. The Operator shall take the necessary measures and/or ensure that they are taken to delete or clarify incomplete or inaccurate data.

6.7. Personal data shall be stored in a form that allows identification of the subject of personal data for no longer than required for the purposes of personal data processing, unless the period of personal data storage is established by federal law, contract to which the subject of personal data is a party, beneficiary or guarantor. Processed personal data shall be destroyed or anonymised when the purposes of processing have been achieved or when it is no longer necessary to achieve these purposes, unless

otherwise provided for by federal law.

7. PURPOSES OF PERSONAL DATA PROCESSING

7.1. Purpose of processing the User's personal data:

7.1.1. Informing the User by sending e-mails;

7.1.2. Conclusion, execution and termination of civil law contracts;

7.1.3. Providing the User with access to services, information and/or materials contained on the Operator's websites.

7.2. The Operator is also entitled to send the User notifications about new products and services, special offers and various events. The User can always refuse to receive information messages by unsubscribing from such messages himself or herself or by sending a letter to the Operator to the e-mail address **org@it-conf.com** with the note "Unsubscribe from notifications about new products and services".

7.3. The anonymised data of Users collected by means of Internet statistics services serve to collect information about Users' actions on the website, to improve the quality of the website and its content.

8. LEGAL BASIS FOR PROCESSING PERSONAL DATA

8.1. The legal basis for the processing of personal data by the Operator is:

8.1.1. Art. 24 of the Constitution of the Russian Federation;

8.1.2. Art. 6 of Federal Law No. 152-FZ "On Personal Data";

8.1.3. Federal Law "On Information, Information Technologies and Information Protection" dated 27.07.2006 №149-FZ;

8.1.4. Statutory documents of the Operator;

8.1.5. Contracts concluded between the operator and the subject of personal data;

8.1.6. Federal laws, other regulatory legal acts in the field of personal data protection;

8.1.7. Users' consents to the processing of their personal data, to the processing of personal data authorised for dissemination.

8.2. The Operator processes the User's personal data only if it is filled in and/or sent by the User himself/herself via special forms located on the Operator's websites or sent to the Operator via e-mail. By filling in the relevant forms and/or sending his/her personal data to the Operator, the User expresses his/her consent to this Policy.

8.3. The Operator processes anonymised data about the User if this is allowed in the User's browser settings (cookie saving and use of JavaScript technology is enabled).

8.4. The subject of personal data independently decides on the provision of his/her personal data

and gives consent freely, of his/her own free will and in his/her own interest.

9. TERMS OF PERSONAL DATA PROCESSING

9.1. Personal data processing is carried out with the consent of the personal data subject to the processing of his/her personal data.

9.2. Processing of personal data is necessary to achieve the purposes provided for by the international treaty of the Russian Federation or by law, to fulfil the functions, powers and duties assigned to the operator by the legislation of the Russian Federation.

9.3. 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.

9.4. The processing of personal data is necessary for the execution of an agreement to which the personal data subject is a party or a beneficiary or guarantor, as well as for the conclusion of 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.

9.5. The processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator or third parties or for the achievement of socially important purposes, provided that the rights and freedoms of the personal data subject are not infringed.

9.6. Processing of personal data to which an unlimited number of persons have access by the personal data subject or at his/her request (hereinafter referred to as **publicly available personal data**) is carried out.

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

10. THE PROCEDURE FOR COLLECTION, STORAGE, TRANSFER AND OTHER TYPES OF PERSONAL DATA PROCESSING

10.1. The Operator ensures the safety of personal data and takes all possible measures to prevent unauthorised persons from accessing personal data.

10.2. The User's personal data will never, under no circumstances, be transferred to third parties, except in cases related to the execution of the current legislation or if the subject of personal data has given consent to the Operator to transfer the data to a third party for the fulfilment of obligations under a civil law contract.

10.3. In case of identifying inaccuracies in the personal data, the User may update them independently, or by sending a notice to the Operator to the Operator's e-mail address **org@it-**

conf.com with the note "Personal Data Update".

10.4. The period of personal data processing is determined by the achievement of the purposes for which the personal data were collected, unless another period is stipulated by the contract or applicable law. The User may withdraw their consent to the processing of personal data at any time by sending a notice to the Operator by e-mail to the Operator's e-mail address **org@it-conf.com** marked "Withdrawal of consent to the processing of personal data».

10.5. All information that is collected by third-party services, including payment systems, means of communication and other service providers, is stored and processed by these persons (Operators) in accordance with their User Agreement and Privacy Policy. The subject of personal data and/or User is obliged to familiarise himself/herself with the said documents in a timely manner. The Operator is not responsible for the actions of third parties, including the service providers specified in this clause.

10.6. The prohibitions established by the personal data subject on the transfer (other than granting access), as well as on the processing or conditions of processing (other than access) of personal data authorised for dissemination shall not apply in cases of processing personal data in the state, public and other public interest, as defined by the legislation of the Russian Federation.

10.7. When processing personal data, the Operator ensures confidentiality of personal data.

10.8. The Operator shall store personal data in a form that allows to identify the subject of personal data for no longer than required by the purposes of personal data processing, unless the period of personal data storage is established by federal law, a contract to which the subject of personal data is a party, beneficiary or guarantor.

10.9. The condition for termination of personal data processing may be the achievement of the purposes of personal data processing, expiry of the personal data subject's consent or withdrawal of consent by the personal data subject, as well as detection of unlawful processing of personal data.

11. LIST OF ACTIONS PERFORMED BY THE OPERATOR WITH THE RECEIVED PERSONAL DATA

11.1. The Operator collects, records, systematises, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (disseminates, provides, accesses), depersonalises, blocks, deletes and destroys personal data.

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

12. CROSS-BORDER TRANSFER OF PERSONAL DATA

12.1. Before commencing a trans-border transfer of personal data, the operator shall be obliged to ensure that the foreign state in whose territory the transfer of personal data is to be carried out ensures reliable protection of the rights of personal data subjects.

12.2. Trans-border transfer of personal data to the territories of foreign states that do not meet the above requirements may be carried out only if the personal data subject consents in writing to the trans-border transfer of his/her personal data and/or fulfils an agreement to which the personal data subject is a party.

13. CONFIDENTIALITY OF PERSONAL DATA

13.1. The operator and other persons who have obtained access to personal data are obliged not to disclose to third parties and not to disseminate personal data without the consent of the subject of personal data, unless otherwise provided for by federal law.

14. FINAL PROVISIONS

14.1. The User may obtain any clarifications on issues of interest regarding the processing of his/her personal data by contacting the Operator via e-mail at **org@it-conf.com**.

14.2. 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.

14.3. The current version of the Policy is freely available on the Internet on the Operator's websites.