

ALCEA LLC. Personal Data Processing Policy.

1 General provisions

- 1.1 This document shall define the procedure for processing personal data and sets out the system of basic principles applied to the processing of personal data at ALCEA LLC (hereinafter referred to as the 'Company').
- 1.2 This Policy covers all and any transactions with personal data carried out at the Company with or without the use of automation tools.
- 1.3 This Policy has to be reviewed and followed by all and any persons authorized to process personal data at the Company, and by persons involved in organizing the processing and ensuring the security of personal data in the Company.
- 1.4 Unrestricted access to this Policy is given through it being posted on the Company's website on the Internet or in a different way.
- 1.5 This Policy has been developed in compliance with the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (CETS No. 108) and Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data'.
- 1.6 This Policy is subject to being updated in the following cases:
 - any changes made to the laws and regulations of the Russian Federation on personal data;
 - any inconsistencies affecting the processing and (or) protection of PD are identified based on the results of monitoring of compliance with the requirements for processing and (or) protection of PD;
 - following the decision of the Company's management.

2 Introduction

- 2.1 As specified by subparagraph 2 Article 3 Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data', the Company is a data processor, i.e. a legal entity that independently organizes and (or) processes personal data, as well as determines the purposes of personal data processing, the content of personal data to be processed, acts (transactions) performed with personal data.
- 2.2 An important condition for the Company to meet its goals is to ensure the protection of the rights and freedoms of a person and citizen – personal data subject – when processing their personal data.
- 2.3 The Company has developed and put into effect local regulations and documents establishing the procedure for processing and ensuring the security of personal data, which ensure compliance with the requirements of Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data' and regulatory acts adopted following it.

3 Principles and conditions for personal data processing in the Company

- 3.1 The Company processes personal data on a lawful and fair basis.
- 3.2 The timeframe for processing and storage of personal data is determined factoring in:
 - the established purposes of personal data processing;
 - the duration of contracts with personal data subjects and the consents given by personal data subjects to the processing of their personal data;
 - the timeframes specified by the Order of the Federal Archive dated 20.12.2019 No. 236 'On approval of the 'List of standard administrative archival documents formed in the course of the activities of state bodies, local governments and organizations, indicating the storage periods', as well as other regulatory acts of the Russian Federation;
 - documentation storage periods established by the Company's internal regulations;
 - dissolution of the Company.
- 3.3 The Company processes personal data on a lawful and fair basis.

- 3.4 When processing personal data, its accuracy, sufficiency, and, if necessary, relevance in relation to the purposes of personal data processing are ensured.
- 3.5 The Company discloses personal data to an unlimited number of people. While doing so, the Company may process PD authorized by the PD subject for distribution, subject to the provisions of Article 10.1 of the Law and with the consent of the PD subject, which is issued separately from other consents of the PD subject to the processing of their PD.
- 3.6 The Company does not create publicly available sources of PD for PD subjects.
- 3.7 The Company processes special categories of personal data as required by law. While doing so, the Company fulfills all the requirements for processing of special categories of personal data provided for by Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data'.
- 3.8 The Company does not process personal criminal record data.
- 3.9 The Company does not process personal biometric data.
- 3.10 The Company carries out cross-border transfer of personal data. While doing so, prior to the cross-border transfer of personal data, the Company notifies the competent authority responsible for the protection of the rights of personal data subjects of its intention to carry out cross-border transfer of personal data in accordance with Article 12 of Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data'.
- 3.11 The Company does not process personal data of subjects in order to promote goods, works and services on the market by making a direct contact using means of communication with the prior consent of the personal data subject.
- 3.12 The Company does not process personal data for the purposes of political solicitation.
- 3.13 The Company does not make decisions that generate legal consequences for the personal data subject or otherwise affect their rights and lawful interests, based solely on automated processing of personal data.
- 3.14 The Company entrusts the processing of personal data to other persons. While doing so, the Company fulfills all the requirements for the delegation of personal data processing specified by Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data'.
- 3.15 The Company processes personal data with and without the use of automation tools. While doing so, the Company fulfills all the requirements for automated and non-automated processing of personal data specified by Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data' and regulatory acts adopted following it.
- 3.16 When collecting personal data, the Company ensures recording, systematization, accumulation, storage, improvement (updating, modification), extraction of personal data using databases located on the territory of the Russian Federation.
- 3.17 The Company notifies the competent authority responsible for the protection of the rights of PD subjects about the processing of PD.
- 3.18 In the context of website users contacting the hotline, the Company does not intend to process personal data, including those related to special categories of data, but if the PD subject sends any such data to the Company of their own free will in an application, they thereby give consent to Alcea LLC to process their personal data and accept the terms of PD processing described in the User Agreement and this Personal Data Processing Policy. For the terms of revoking their consent to personal data processing, the PD subject may see the above-mentioned documents.

4 The rights of subjects of personal data processed by the Company

- 4.1 The personal data subject has the right to receive information concerning the processing of their personal data. To receive any such information, the personal data subject may send a written request at the address: Russia, 129110, Moscow, Olympiyskiy Ave., 16, building 5, floor 5, room I in accordance with the procedure established by Article 14 of Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data'.
- 4.2 The personal data subject has the right to demand that the Company updates their personal data, blocks or destroys those if any such personal data is incomplete, outdated, inaccurate, illegally obtained or is

not necessary for the stated purpose of processing. To put any such demands in action, the personal data subject may send a written request at the address: Russia, 129110, Moscow, Olympiyskiy Ave., 16, building 5, floor 5, room I in accordance with the procedure established by Article 21 of Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data'.

5 The Company fulfilling its operator obligations

- 5.1 The Company receives personal data from personal data subjects, from third parties (persons who are not personal data subjects). While doing so, the Company fulfills the obligations specified by Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data' when collecting personal data.
- 5.2 The Company stops processing personal data in the following cases:
- upon reaching the goals of data processing, or if achieving these goals is no longer necessary;
 - at the request of the personal data subject, if the personal data processed by the Company is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing;
 - if unlawful processing of personal data has been discovered, if it is impossible to ensure the legality of the processing of personal data;
 - if the personal data subject withdraws consent to the processing of their personal data (if the personal data is processed by the Company on the basis of the consent of the personal data subject);
 - the reasons for the processing of personal data have been eliminated, unless otherwise established by federal law;
 - if the Company is dissolved.
- 5.3 The Company has taken the following measures to ensure the fulfillment of obligations specified by Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data' and regulatory acts adopted following it:
- a person responsible for the organization of personal data processing has been appointed;
 - local acts have been issued on the processing and security of personal data, as well as local acts establishing procedures aimed at preventing and detecting violations of the laws of the Russian Federation, eliminating the consequences of any such violations:
 - Regulation on personal data processing;
 - Regulations on organization and ensuring the security of personal data;
 - other local acts on the processing and security of personal data.
 - legal, organizational and technical measures have been taken to ensure the security of personal data;
 - the Company conducts internal monitoring of compliance of personal data processing with the requirements of Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data' and regulatory acts adopted following it, this Policy, and local acts of the Company;
 - the Company has conducted an assessment of the damage that may be caused to personal data subjects in case of violation of the requirements of federal personal data laws, measured the correlation between any such damage and the steps taken by the Company to ensure compliance with the obligations specified by the requirements of Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data' and regulatory acts adopted following it;
 - the Company's employees who directly process personal data are familiar with the provisions of Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data' and regulatory acts adopted following it, this Policy and local acts of the Company on personal data processing.
- 5.4 The Company implements the following requirements for the protection of personal data:
- threats to the security of personal data during its processing in personal data information systems have been identified;

- organizational and technical measures, necessary to meet the requirements for personal data protection, have been taken to ensure the security of personal data during its processing in personal data information systems, the implementation of which ensures the levels of personal data protection established by the Government of the Russian Federation;
- information protection tools that have passed the assessment of compliance with the requirements of the laws of the Russian Federation regarding cybersecurity are used, if the use of any such tools is required to neutralize current threats;
- an assessment of the effectiveness of the measures taken to ensure the security of personal data has been done before commissioning the personal data information system;
- machine-based personal data carriers are registered and accounted for;
- facts of unauthorized access to personal data are detected and appropriate measures are taken;
- personal data that has been modified or destroyed due to unauthorized access to them is restored;
- the rules for getting access to personal data processed in the personal data information system are established, as well as registration and recording of all actions performed with personal data in the personal data information system is done;
- the measures taken to ensure the security of personal data and the level of security of personal data information systems are monitored;
- the requirements established by the Decree of the Government of the Russian Federation dated 15 September 2008 No. 687 ‘On Approval of the Regulation on the specifics of personal data processing carried out without the use of automation tools’ have been implemented;
- The Company is ready and willing to ensure interaction with the state system for detecting, preventing and eliminating the consequences of computer attacks on information resources of the Russian Federation, including notifications about computer incidents that led to unlawful access, disclosure, dissemination and transfer of personal data.

6 The Company processes the specified PD for the purposes, within the timeframe and on the legal grounds specified in the table below

Category of subjects	List of PD	Purpose of processing	Processing timeframe	Grounds for processing
Candidates for a vacant position	<ul style="list-style-type: none"> - Full name - Date of birth - Information about education (educational institution, diploma number, major and qualification stated in the diploma) - Information about work experience (place of work, role, time in the role) - Contact information (e-mail address, contact phone number) 	The employer deciding to accept or refuse to hire a candidate for a vacant position	Within 30 days from the date of meeting the goal	<ul style="list-style-type: none"> - An applicant posting their resume on a public platform (Internet) accessible to an unlimited number of people; - Contract with a recruitment agency; - Consent of the PD subject to the processing of PD, expressed by conclusive actions.
Employees	<ul style="list-style-type: none"> - Full name - Gender - Date of birth - Place of birth - Citizenship - Nationality - Passport or other ID card info (series, number, date of issue, issuing authority) - Details of documents on education, qualifications or expertise in a specific field (educational institution, year of graduation, qualification, major) - Data from employment record (occupation, area of expertise, employment information: place of work, position/role, awards) - Number of the certificate of compulsory pension insurance (SNILS) - Taxpayer Identification Number (INN) - Marital status - Address of registration - Address of residence - Contact information (contact phone number, e-mail address) - Service number - Data on transfers - Data on certifications - Data on professional development - Data on professional retraining - Medical record - Data on awards and honorary titles - Data on vacations, social benefits - Details of the employment contract and supplementary agreements to it (position/role, division, remuneration (salary, allowance), schedule and working conditions, additional information, information on termination of the employment contract) 	<ul style="list-style-type: none"> - Meeting the goals stipulated by the laws of the Russian Federation, exercising and fulfilling the functions, powers and obligations given to the Company by the laws of the Russian Federation; - Conclusion, execution, modification and termination of an employment contract to which the PD subject is a party, including assistance in training and promotion, ensuring personal safety of employees, monitoring the quantity and quality of work performed, ensuring the safety of property, calculation and payment of wages, other remuneration, calculation and transfer of taxes and insurance premiums, providing employees with additional guarantees, compensations and benefits. 	<ul style="list-style-type: none"> - 1 year, 3,4,5 or 50/75 years depending on the terms established by Order 236 or the Rules of the Federal Archive (for hard copies of personal data) - In accordance with the deadline specified in the consent of the PD subject - In accordance with the timeframe established by the contract (for PD in contracts) - Dissolution of the Company 	<ul style="list-style-type: none"> - Federal Law No. 197-FZ Labor Code of the Russian Federation dated 30.12.2001, Articles No. 65-69, 213, 266 - Employment contract - Federal Law No. 167-FZ dated 15.12.2001 'On Compulsory Pension Insurance in the Russian Federation', Article No. 13, paragraph 2 - Tax Code of the Russian Federation, Article No. 23, paragraph 1, Article No. 80, paragraph 3 - Decree of the Government of the Russian Federation No. 719 'On approval of the Regulation on military service registration' dated 27.11.2006, section III - Written consent of the PD subject - Consent to the distribution of PD - Decree No. 73 of the Ministry of Labor and Social Development of the Russian Federation dated 24 October 2002.

	<ul style="list-style-type: none"> - Data from military service records (military rank, area of expertise, category of fitness for military service, when registered for/retired from military service) - Other data in the personal file (details of statements and written explanations, details of decisions on giving a commendation and decisions on disciplinary punishment, details of orders and other documents) - Details of the children's birth certificate - Details of the foreign passport (series, number, date of issue and issuing authority) - Information about health insurance/life insurance - Bank details - Information about the payment (terms, charges) - Details of the power of attorney - Address of the place of work - Geolocation data - Signature 			
Fired employees	<ul style="list-style-type: none"> - Full name - Gender - Date of birth - Place of birth - Citizenship - Nationality - Passport or other ID card info (series, number, date of issue, issuing authority) - Details of documents on education, qualifications or expertise in a specific field (educational institution, year of graduation, qualification, major) - Data from employment record (occupation, area of expertise, employment information: place of work, position/role, awards) - Number of the certificate of compulsory pension insurance (SNILS) - Taxpayer Identification Number (INN) - Marital status - Address of registration - Address of residence - Contact information (contact phone number, e-mail address) - Service number - Data on transfers - Data on certifications - Data on professional development - Data on professional retraining - Medical record 	<ul style="list-style-type: none"> - Meeting the goals stipulated by the laws of the Russian Federation; exercising and fulfilling the functions, powers and obligations given to the Company by the laws of the Russian Federation; - Implementation of the procedure for archiving personnel and accounting documentation. 	1 year from the date of the employee's dismissal, then hard copies of relevant documents are subject to archiving according to the laws of the Russian Federation	<ul style="list-style-type: none"> - Tax Code of the Russian Federation - Federal Law No. 402-FZ dated 06.12.2011 'On Accounting', etc. - Federal Archive Order No. 236 - Rules of the Federal Archive dated 06.02.2002

	<ul style="list-style-type: none"> - Data on awards and honorary titles - Data on vacations, social benefits - Details of the employment contract and supplementary agreements to it (position/role, division, remuneration (salary, allowance), schedule and working conditions, additional information, information on termination of the employment contract) - Data from military service records (military rank, area of expertise, category of fitness for military service, when registered for/retired from military service) - Other data in the personal file (details of statements and written explanations, details of decisions on giving a commendation and decisions on disciplinary punishment, details of orders and other documents) - Details of the children's birth certificate - Details of the power of attorney - Address of the place of work 			
Relatives of employees	<p>Details of the copy of the marriage certificate:</p> <ul style="list-style-type: none"> - Full name (spouse) - Citizenship - Date of birth - Place of birth - Date of issue of the certificate - Details of the certificate <p>Details of the copy of the birth certificate:</p> <ul style="list-style-type: none"> - Full name (child) - Date of birth - Place of birth - Full names (parents) - Citizenship (parents) - Date of issue of the certificate - Details of the certificate 	<ul style="list-style-type: none"> - Meeting the goals stipulated by the laws of the Russian Federation; exercising and fulfilling the functions, powers and obligations given to the Company by the laws of the Russian Federation. 	<ul style="list-style-type: none"> - 5 years after termination of the employment relationship; -50/75 years (for PD in the employee's personal file) - In accordance with the deadline specified in the consent to the processing of PD - Dissolution of the Company 	<ul style="list-style-type: none"> - Labor Code of the Russian Federation - Employment contract with an employee whose relative is a PD subject - Consent to the processing of PD - Federal Law No. 402-FZ dated 06.12.2011 'On Accounting', etc.

Contractors (individuals, individual entrepreneurs)	<ul style="list-style-type: none"> - Full name - Address of residence - Address of registration - Data from employment record (occupation, area of expertise, employment information: place of work, position/role) - Passport details (series, number, date of issue, issuing authority) - Contact information (contact phone number, e-mail address) - Taxpayer Identification Number (INN) - Bank details - Signature 	<ul style="list-style-type: none"> - Conclusion, execution, modification and termination of an agreement to which the Contractor is a party or beneficiary; - Conducting and participating in commercial tenders; - Conducting commercial, financial, legal negotiations aimed at concluding, executing, modifying or terminating any contracts not prohibited by relevant law, regardless of the results of such negotiations; - Exercising due diligence when choosing a contractor; - Meeting the goals specified by the law of the Russian Federation; exercising and fulfilling the functions, powers and obligations given to the Company by the laws of the Russian Federation. 	<ul style="list-style-type: none"> - 5 years after termination of the contractual relationship - In accordance with the timeframe established by the agreement - Dissolution of the Company 	<ul style="list-style-type: none"> - Civil Code of the Russian Federation - Order of the Ministry of Internal Affairs of the Russian Federation No. 735 dated 21 September 2017 ‘On Approval of the Administrative Regulations of the Ministry of Internal Affairs of the Russian Federation on the provision of public services for the registration and issuance of invitations to enter the Russian Federation for foreign citizens and stateless persons’ - Contract with the contractor - Federal Law No. 167-FZ dated 15.12.2001 ‘On Compulsory Pension Insurance in the Russian Federation’, Article No. 13, paragraph 2 - Tax Code of the Russian Federation, Article No. 23, paragraph 1, Article No. 80, paragraph 3 - Decree No. 73 of the Ministry of Labor and Social Development of the Russian Federation dated 24 October 2002.
Representatives of contractors (corporations)	<ul style="list-style-type: none"> - Full name - Passport details (series, number, date of issue, issuing authority) - Contact information (contact phone number, e-mail address) - Details of the power of attorney (number, date of issue) - Data from employment record (place of work, position/role) - Address of the place of work - Signature 			
Representatives of the Head Office	<ul style="list-style-type: none"> - Full name - ID card info (series, number, date of issue, issuing authority) - Contact information (contact phone number, e-mail address) - Data from employment record (place of work, position/role) - Date of birth - Citizenship - Date of the visit - Purpose of the visit. 		Dissolution of the Company	
Healthcare professionals	<ul style="list-style-type: none"> - Full name - Healthcare facility - Address of residence - Data from employment record (place of work, position/role, area of expertise) - Passport details (series, number, date of issue, issuing authority) - Contact information (e-mail address, contact phone number) - Details of documents on education, qualifications or expertise in a specific field (educational institution, year of graduation, qualification, major) - Taxpayer Identification Number (INN) - Bank details - Grade 	<ul style="list-style-type: none"> - Meeting the goals stipulated by the laws of the Russian Federation; exercising and fulfilling the functions, powers and obligations given to the Company by the laws of the Russian Federation; - Providing information support via the Internet; - Publication of lectures by doctors. 	<ul style="list-style-type: none"> - In accordance with the deadlines set by the Consent to the processing of PD or 5 years after the termination of the contractual relationship; - Dissolution of the Company 	<ul style="list-style-type: none"> - Federal Law No. 61-FZ dated 12.04.2010 ‘On the Circulation of medications’ - Order of the Ministry of Health and Social Development of the Russian Federation No. 757n dated 26.08.2010 ‘On approval of the procedure for monitoring the safety of medication for medical use, registration of side effects, serious adverse reactions, unforeseen adverse reactions when

	<ul style="list-style-type: none"> - Photo - Signature - Login, password 			<p>using medication for medical purposes’</p> <ul style="list-style-type: none"> - Order of the Federal Service for Surveillance in Healthcare dated 15.02.2017 No. 1071 ‘On Approval of the procedure for pharmacovigilance’ - Consent of the subject to the processing of PD - User Agreement on the Company's website
Patients	<ul style="list-style-type: none"> - Full name - Address of residence - Date of birth - Age - Gender - Contact information (e-mail address, contact phone number) - Diagnosis - Adverse reaction to a medication - Categories of severity of adverse reaction - Outcome of adverse reaction - Weight 	<ul style="list-style-type: none"> - Meeting the goals stipulated by the laws of the Russian Federation; fulfilling the obligations given to the Company by the laws of the Russian Federation; - Interaction with patients with a suspected adverse side effect or suspected ineffectiveness of medications; - Monitoring the effectiveness and safety of pharmaceutical products sold, collecting information about adverse reactions or ineffectiveness of medications or other pharmaceutical products manufactured and sold by the Company. 	Dissolution of the Company	<ul style="list-style-type: none"> - Federal Law No. 61-FZ dated 12.04.2010 ‘On the Circulation of medications’ - Order of the Ministry of Health and Social Development of the Russian Federation No. 757n dated 26.08.2010 ‘On approval of the procedure for monitoring the safety of medication for medical use, registration of side effects, serious adverse reactions, unforeseen adverse reactions when using medication for medical purposes’ - Order of the Federal Service for Surveillance in Healthcare dated 15.02.2017 No. 1071 ‘On Approval of the procedure for pharmacovigilance’ - Patient's consent to the processing of PD on the Company's website - User Agreement on the Company's website
Representatives of the founders	<ul style="list-style-type: none"> - Full name - Place of work - Title/role - Signature 	<ul style="list-style-type: none"> - Conclusion, execution, modification and termination of an agreement to which the PD subject is a party; - Meeting the goals stipulated by the laws of the Russian Federation; fulfilling the obligations given to the Company by the laws of the Russian Federation. 	In accordance with the terms established by the agreement Dissolution of the Company	<p>Federal Law No. 14-FZ dated 08.02.1998 ‘On Limited Liability Companies’</p>

Office visitors	<ul style="list-style-type: none"> - Full name - Date of the visit - Time of the visit 	Ordering a pass for a visitor and providing authorized access to the office territory	Until the processing goal is reached	Consent of the PD subject, expressed by the subject's conclusive actions when providing their PD
Website visitors	<ul style="list-style-type: none"> - IP address - Cookie file data - Addresses of requested pages, search queries - Information about the device, technical specifications of the hardware and software 	<ul style="list-style-type: none"> - identification of the Website User; - conducting statistical research, collecting information about the use of the website by the User; - informing Website Users about the Company's management; - providing the User with the contact information for inquiries: - getting medical information about the Company's products; - sending information about side effects, adverse effects of medications and medical products of the Company; - related to the quality of the Company's products. 	Until the processing goal is reached	<ul style="list-style-type: none"> User Agreement on the Company's website; Policy regarding the processing of personal data on the website; Consent to the processing of personal data in an electronic form on the website.