

APPROVED
General Director of LLC "YULAPARK"

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**Personal Data Processing Policy
on the Website of LLC "YULAPARK"**

1. General Provisions

1.1. This Personal Data Processing Policy (hereinafter – the "Policy") has been drafted in accordance with Clause 2, Part 1, Article 18.1 of Federal Law No. 152-FZ of 27 July 2006 "On Personal Data" and applies to the personal data of users of the website and persons interacting with the Operator through the website located at: www.yulapark.ru (hereinafter – the "Website"). The personal data operator is LLC "YULAPARK". The Policy defines the fundamental principles, purposes, conditions and methods of personal data processing by the Operator, the categories of data subjects and the lists of data processed, the protective measures implemented, as well as the rights of data subjects.

1.2. The purpose of this Policy is to define the categories of personal data processed by the Operator, as well as the core principles guiding the Operator in processing personal data, and to inform Website users of the procedure for processing their personal data and the measures taken to protect such data.

1.3. The provisions of this Policy are binding upon all employees of the Operator involved in processing the personal data of Website users, and shall also apply to the legal relations between the Operator and Website users.

1.4. Terms and definitions used in this Policy shall have the meanings ascribed to them by Federal Law No. 152-FZ "On Personal Data".

1.5. This Policy applies to the processing of personal data of the following categories of data subjects:

- Website users who complete forms on the Website and/or subscribe to mailing lists;
- clients who are natural persons and representatives of counterparties who are legal entities, interacting with the Operator through the Website (submitting inquiries or applications, or entering into agreements with the Operator through the Website);
- other data subjects whose data is processed by the Operator in connection with the use of the Website.

1.6. The Operator shall ensure compliance with the principles and conditions for the processing of personal data established by the legislation of the Russian Federation, and shall organise the processing of personal data in a manner that prevents processing incompatible with the stated purposes.

1.7. Data subjects or their legal representatives shall have the right to:

- obtain complete information regarding their personal data and the processing thereof (including automated processing);
- exercise free and unrestricted access to their personal data, including the right to obtain copies of any record containing the data subject's personal data, except in cases provided for by federal legislation of the Russian Federation;
- demand the destruction or correction of inaccurate or incomplete personal data, as well as data processed in violation of the legislation of the Russian Federation;
- in the event that the Operator or a person authorised by the Operator refuses to destroy or correct the data subject's personal data – submit a written objection setting out the relevant justification;
- appeal to a court against any unlawful actions or inaction of the Operator or an authorised person carried out in the course of processing and protecting the data subject's personal data.

1.8. Data subjects are recommended to:

- provide the Operator with accurate personal data;
- promptly notify the Operator of any changes to their personal data in order to ensure the accuracy of processing.

The provision of inaccurate or incomplete data may render the Operator unable to fulfil its obligations to the data subject.

1.9. The Operator shall have the right to process personal data subject to the existence of lawful grounds therefor, the conformity of the processing activities with the stated purposes of processing, and compliance with the requirements of the legislation of the Russian Federation, this Policy and other local acts of the Operator.

1.10. The Operator shall be obliged to:

- at its own expense, ensure the protection of personal data against unlawful use or loss in the manner established by the legislation of the Russian Federation;
- provide the data subject, upon their request, with information relating to the processing of their personal data, or, on lawful grounds, refuse to provide such information;
- ensure the data subject's free and unrestricted access to their personal data, including the right to obtain copies of any record containing their personal data, except in cases provided for by the legislation of the Russian Federation;
- at the request of the data subject, clarify, block or delete the processed personal data if such data is incomplete, outdated, inaccurate, unlawfully obtained or no longer necessary for the stated purpose of processing;
- notify the data subject of the processing of their personal data in cases where such data was obtained from a source other than the data subject;
- upon achievement of the purpose of processing, immediately cease the processing of personal data and destroy the relevant personal data within a period not exceeding thirty days from the date on which the purpose of processing is achieved, unless otherwise provided by federal legislation of the Russian Federation;
- upon receipt of a request from the data subject to cease processing of their personal data, cease such processing and destroy the personal data within a period not exceeding ten working days from the date of receipt of the said request. The said period may be extended by no more than five working days where the Operator sends

the data subject a reasoned notification stating the grounds for the extension. The Operator shall have the right to continue processing personal data in the cases provided for by Clauses 2–11, Part 1, Article 6, Part 2, Article 10, and Part 2, Article 11 of Federal Law No. 152-FZ "On Personal Data";

- disclose the personal data of the data subject only to authorised persons and only to the extent necessary for the performance of their official duties in accordance with this Policy and the legislation of the Russian Federation.

2. Purposes of Personal Data Processing

2.1. For each category of personal data, the Operator has determined and approved specific purposes of processing. Processing of personal data that is incompatible with the approved purposes shall not be permitted.

2.2. The purposes of personal data processing are derived, inter alia, from an analysis of the legal acts governing the Operator's activities, the purposes of the activities actually carried out by the Operator, the activities envisaged by the Operator's constituent documents, and the Operator's specific business processes in specific personal data information systems.

2.3. The principal purposes for which the Operator processes personal data in the context of the use of the Website include:

- civil law relations and clients: conclusion, performance and termination of civil law agreements with natural persons, as well as with legal entities and their representatives; interaction with clients, including coordination of cooperation, preparation of proposals, and claims management; protection of the rights and legitimate interests of the Operator, including in connection with the submission of applications and the conclusion of agreements through the Website;
- processing of inquiries and applications through the Website and other communication channels: receipt, registration and processing of inquiries submitted through the Website, by telephone, by email, and by other means; establishment and maintenance of feedback with data subjects; preparation and dispatch of responses to inquiries, consultations, proposals and other information at the request of data subjects;
- informational mailings: sending messages of an informational nature to the email address or telephone number provided by the data subject (confirmation of an application, notification of the status of an inquiry, response to a request), which constitutes an integral part of the interaction within the scope of the stated purposes and does not require separate consent;
- promotional and marketing mailings: informing clients and subscribers of the Operator's goods, works and services, special offers, events and news exclusively upon receipt of a separate prior express consent of the data subject to receive promotional communications;
- use of the Website, cookies and web analytics tools: ensuring the operation and security of the Website; improving the quality of the Website's functioning and user convenience, adapting content; analysing Website traffic and the effectiveness of advertising campaigns, using counters and web analytics systems; prevention of fraud and other unlawful actions.

2.4. Processed personal data shall be subject to destruction or anonymisation upon the expiry of the retention period, upon achievement of the purposes of processing, or in the event that the necessity to achieve such purposes no longer exists, unless otherwise provided by legislation.

3. Procedure and Conditions for Processing Personal Data

3.1. All personal data is obtained by the Operator directly from the data subject, their representative or the person who has instructed the Operator to process the personal data, except in cases provided for by the legislation of the Russian Federation.

3.2. Personal data is processed with the consent of the data subject, except in cases provided for by the legislation of the Russian Federation. Consent to the processing of personal data obtained through the Website is expressed by the User actively checking the corresponding field (checkbox) prior to submitting a form. The fact of receipt of consent is recorded by the Operator by technical means. Consent to processing provided in paper form shall be executed in accordance with the requirements of Article 9 of Federal Law No. 152-FZ.

3.3. Consent to the processing of personal data may be withdrawn by the data subject. In cases provided for by the legislation of the Russian Federation, the processing of personal data may be continued even after the data subject has withdrawn their consent.

3.4. Personal data is processed by the Operator using automated and non-automated means, within the Operator's personal data information systems, as well as using information technologies and technical means that ensure the functioning of the Operator's Website.

3.5. When using the Operator's Website, technical data may be collected automatically, including the IP address, browser and device type information, date and time of visit, addresses of pages requested, referral source, as well as cookie file data and identifiers used by web analytics counters and pixels. Such data is processed for the purposes specified in Clause 2.2 in the section "Purposes of Personal Data Processing", to the extent permitted by the legislation of the Russian Federation.

3.6. The use of cookies and web analytics tools is subject to notification to Website users; some cookies may be technically necessary for the operation of the Website, while others may be used for analytics and advertising purposes. Users may restrict or disable the use of cookies in their browser settings; this may affect the proper functioning of certain sections of the Website.

3.7. Promotional and informational communications via electronic channels shall be sent only upon the separate consent of the data subject in accordance with personal data and advertising legislation; the data subject shall have the right to unsubscribe from such communications at any time.

3.8. When making decisions affecting the interests of a data subject, the Operator shall never base such decisions on the data subject's personal data obtained exclusively as a result of automated processing or electronic receipt thereof.

3.9. Personal data shall not be used for the purpose of causing pecuniary or non-pecuniary harm to individuals or impeding the exercise of the rights and freedoms of citizens of the Russian Federation.

3.10. Access to personal data being processed is granted only to those employees of the Operator whose job functions are directly related to the processing of such data. All employees with access to such data are required to maintain the confidentiality of personal data and shall execute the corresponding undertaking.

- 3.11. The transfer of Users' personal data to third parties shall be carried out by the Operator only on lawful grounds and to the extent necessary to achieve the purposes of processing specified in this Policy.
- 3.12. The Operator shall have the right to transfer personal data to bodies of inquiry and investigation and other authorised authorities on the grounds provided for by the applicable legislation of the Russian Federation.
- 3.13. The Operator shall have the right to create publicly available sources of personal data, which may include the personal data of a data subject with their written consent.
- 3.14. The transfer of a data subject's personal data for commercial purposes without their written consent shall not be carried out.
- 3.15. Where personal data must be transferred by the Operator to third parties, such transfer shall be effected only after the conclusion of a non-disclosure agreement between the Operator and the third party, except in cases provided for by the legislation of the Russian Federation.
- 3.16. Personal data is processed both using and without the use of computing equipment.
- 3.17. The retention periods for personal data processed by the Operator are determined on the basis of the periods for achieving the purposes of processing specified in this Policy, the terms of agreements with data subjects, the limitation periods for potential disputes, and the requirements of the legislation of the Russian Federation.
- 3.18. Upon achievement of the purposes of processing or in the absence of necessity to achieve such purposes, personal data shall be deleted or anonymised, unless otherwise provided by the legislation of the Russian Federation.
- 3.19. Personal data collected through the Website is processed in the Operator's information systems hosted on servers located within the territory of the Russian Federation. Cross-border transfer of personal data in the course of using the Website shall not be carried out.

4. Scope and Categories of Personal Data Processed; Categories of Data Subjects

- 4.1. The content and scope of personal data processed by the Operator shall be consistent with the stated purposes of processing and shall not be excessive.
- 4.2. The processing of personal data shall be permitted in the following cases:
- where the data subject has consented to the processing of their personal data, including by checking the corresponding field (checkbox) in a form on the Website or by accepting the terms of use of the Website;
 - where the processing of personal data is necessary for the conclusion and performance of an agreement to which the data subject is a party, beneficiary or guarantor, including in connection with the submission of applications or orders through the Website;
 - where the processing of personal data is necessary for the exercise of the rights and legitimate interests of the Operator or third parties, provided that the rights and freedoms of the data subject are not thereby infringed;
 - where the processing of personal data is carried out for statistical and other research purposes, subject to mandatory anonymisation of such personal data;
 - in other cases expressly provided for by the legislation of the Russian Federation.
- 4.3. The categories of data subjects include:

Clients and counterparties of the Operator – natural persons, including customers and contractors under civil law agreements concluded through the Website and/or other communication channels.

In respect of this category of data subjects, the Operator processes personal data obtained in connection with the conclusion and performance of agreements, used exclusively for the performance of such agreements and the fulfilment of the Operator's obligations, including:

- surname, first name, patronymic (where applicable);
- contact telephone numbers;
- email address;
- identity document details, to the extent necessary for the conclusion and performance of the agreement;
- TIN (taxpayer identification number), and, where necessary, other mandatory details required by the legislation of the Russian Federation;
- bank account number and other payment details necessary for the performance of obligations under the agreement.

Representatives/employees of clients and counterparties of the Operator who are legal entities, including customers and contractors under civil law agreements.

In respect of this category of data subjects, the Operator processes personal data provided in connection with the conclusion and performance of an agreement, including:

- surname, first name, patronymic (where applicable);
- position;
- contact telephone numbers;
- email address;
- identity document details, to the extent necessary for the identification of the representative and confirmation of their authority.

Website visitors, mailing list subscribers and other persons submitting inquiries through the Website and/or by other means.

In respect of this category of data subjects, the Operator processes, in particular:

- surname, first name, patronymic (where applicable);
- contact telephone number;
- email address;
- information which the data subject independently provides in the text of an inquiry or form (e.g., the subject of the inquiry, description of the service of interest, details of an organisation if the inquiry is submitted on its behalf);
- technical data automatically collected when using the Website, including: IP address, browser and device type information, date and time of visit, addresses of pages requested, referral source, cookie file data and identifiers used by web analytics counters and pixels.

4.4. When using the Website, the Operator may use cookies and web analytics tools (including third-party services) for the following purposes:

- ensuring the operation and security of the Website;
- retaining User preferences and improving the usability of the Website;
- analysing Website traffic and evaluating the effectiveness of advertising campaigns;
- improving the content and quality of the services provided.

The use of cookies and web analytics tools is subject to notification of Users. Some cookies are technically necessary for the proper functioning of the Website, while others may be used for analytical and marketing purposes. Users may restrict or disable the use of cookies in their browser settings; certain functions of the Website may not operate correctly as a result.

4.5. The Operator, in conducting its activities through the Website, does not and does not intend to process special categories of personal data (relating to health, political or religious beliefs, etc.). Users are recommended not to enter such information in the free-text fields of forms. In the event that such information is provided by a user, the Operator shall immediately cease its processing and destroy the relevant data.

4.6. Personal data shall be subject to destruction or anonymisation upon the expiry of the retention period, upon achievement of the purposes of processing, or in the event that the necessity to achieve such purposes no longer exists, unless otherwise provided by the legislation of the Russian Federation.

5. Personal Data Protection

5.1. The Operator shall ensure the protection of personal data against unlawful or accidental access, destruction, modification, blocking, copying, dissemination and other unlawful actions.

5.2. The security of personal data is ensured by the Operator through the adoption of legal, organisational and technical measures that are necessary and sufficient to fulfil the obligations provided for by the legislation of the Russian Federation in the field of personal data protection, in accordance with the requirements of Decree of the Government of the Russian Federation No. 1119 of 1 November 2012 "On Approval of Requirements for the Protection of Personal Data in the Course of Its Processing in Personal Data Information Systems". Such measures include, in particular:

- appointment of a person responsible for organising the processing of personal data;
- issuance of local acts defining the policy and procedure for the processing of personal data;
- implementation of antivirus protection and firewall tools;
- ensuring encryption of data during transmission over networks (use of the HTTPS protocol);
- regular monitoring of security threats and review of measures implemented;
- internal audit of the personal data processing and storage regime.

5.3. All protective measures applicable to the collection, processing, storage and transfer of the data subject's personal data extend equally to paper-based and electronic (automated) information media.

6. Updating, Correction, Deletion and Destruction of Personal Data

6.1. The Operator shall have the right to add to, supplement, amend, block or delete personal data in accordance with the federal legislation of the Russian Federation.

6.2. At the request of a data subject, the Operator shall be obliged to:

- provide information on whether the Operator holds the personal data of the data subject;
- provide the opportunity to review the data subject's personal data (with the exception of cases provided for by Article 14, Part 5, of Federal Law No. 152-FZ) and provide information relating to the processing of their personal data in accordance with Federal Law No. 152-FZ;
- clarify inaccurate or changed personal data;
- block or destroy personal data where such data has been unlawfully obtained, is no longer necessary for the stated purpose of processing, or where the data subject's consent has been withdrawn.

6.3. A data subject's request may be submitted to the Operator in writing to the legal address, or in electronic form to the email address: contact@yulapark.ru. A request submitted in electronic form must originate from an address previously provided by the data subject to the Operator (where applicable). For the purpose of identifying the data subject and preventing unlawful access to third-party data, the Operator shall have the right to request additional information confirming the identity of the applicant (including by requesting copies of documents, not as a mandatory requirement, but as a precautionary measure in cases of doubt).

6.4. Upon receipt of a data subject's request, the responsible employee of the Operator shall record the receipt of the request in accordance with the Operator's internal record-keeping rules.

6.5. A response, or a reasoned refusal, must be sent within ten working days from the date of receipt of the data subject's request. The said period may be extended by no more than five working days where the Operator sends the data subject a reasoned notification stating the grounds for the extension. The response must be provided in the same form in which the corresponding inquiry or request was submitted, unless otherwise specified in the inquiry or request, and must contain specific and comprehensive information on the substance of the matter.

6.6. Upon confirmation of the inaccuracy, unlawfulness or incompleteness of personal data, the Operator shall make the necessary corrections or destroy the data within a period not exceeding seven working days from the date of receipt of the relevant information from the data subject. The Operator shall notify the data subject of the fact of destruction or correction within the same period, by the means specified in the data subject's request, or, where no such means is specified, by email to the address from which the request was submitted.

7. Amendments to the Policy

7.1. The Operator shall have the right to make amendments to this Policy. Upon amendment, the date of the most recent revision shall be indicated in the header of the Policy. A new version of the Policy shall enter into force upon its publication on the Operator's Website, unless otherwise provided by the new version of the Policy.

7.2. The current version is held by the Operator; the electronic version of the Policy is published on the Operator's Website at www.yulapark.ru.

7.3. The law of the Russian Federation shall apply to this Policy and to the legal relations between data subjects and the Operator.

8. Contact Information

8.1. Email address for enquiries regarding the processing of personal data: contact@yulapark.ru

8.2. The Operator shall consider enquiries sent to the above email address and shall respond within the time limits and in the manner established by the legislation of the Russian Federation and this Policy.

8.3. Company details: LLC "YULAPARK", OGRN 1127746349279, TIN (INN) 7719810423, KPP 771901001, postal address: 105037, Moscow, Baumana gorodok, bldg. 2, str. 10.