

PRIVACY POLICY

1. KEY TERMS AND DEFINITIONS

- 1.1. Anonymization of personal data: Process of encrypting or removing personally identifiable data from data sets so that the person can no longer be identified directly or indirectly.
- 1.2. Automated processing of personal data: Processing of personal data by automated means.
- 1.3. Blocking of personal data: Temporarily stopping the processing of personal data, except where processing is needed to verify or correct the data.
- 1.4. Disclosure of personal data: Making personal data available to a specific person or a defined group of persons.
- 1.5. Erasure of personal data: Removal of personal data from the personal data system so that it cannot be recovered, and/or physical destruction of the media containing the data.
- 1.6. Personal data information system: A database and the tools used to collect and process personal data.
- 1.7. Personal data processing: Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Personal data Processor (hereinafter referred to as the Processor): a government or municipal authority, legal entity, or individual that processes personal data, either independently or through contractors, and determines the purposes and means of such processing.

In this Privacy Policy, the term “Processor” refers to ASCON Design Systems LLC (Tax ID: 7801619483), as well as its subsidiaries, affiliates, and related parties and individuals that process personal data for the purposes specified in this Privacy Policy, using processing means owned or lawfully used by them, including through ownership, lease, or other legal grounds.

- 1.8. Personal data: Any information relating to an identified or identifiable physical person (“data subject”).
- 1.9. Public disclosure of personal data: Making personal data available to an undefined or unlimited group of persons.
- 1.10. Transfers of personal data to third countries: Any transfer of personal data to a third country, including its authorities, legal entities, or individuals.

2. GENERAL PROVISIONS

- 2.1. This Privacy Policy (hereinafter referred to as the Policy) is an official document that defines the general principles, purposes, and procedures for personal data (PD) processing and protection.
- 2.2. This Policy becomes effective immediately upon approval and shall remain in force indefinitely with respect to all personal data processed by the personal data systems until it is replaced by a new Policy.

3. PURPOSES OF PERSONAL DATA PROCESSING

- 3.1. The Processor may process personal data only for the following purposes:
 - compliance with the current legislation of the Russian Federation, including the Labor Code
 - assisting employees in career advancement
 - safeguarding of assets
 - work safety
 - record keeping
 - calculation and payment of temporary disability benefits
 - assessment of work capacity
 - corporate website management
 - communication with employees; internal communications management, including email and corporate messengers, and inclusion of employee details in internal corporate directories
 - access control for the Processor’s site
 - training
 - maintaining an internal telephone directory

- issuing corporate SIM cards
- posting personal data in publicly accessible locations (bulletin boards)
- payment of social benefits and other welfare bonuses
- provision of compensations, benefits, extra days off
- holiday gifts for employees' children
- processing job applicants data; selecting suitable positions for job applicants
- communication with the data subject
- conclusion, performance, and termination of contracts and/or agreements, including those with independent contractors
- technical support for employees
- provision of warranty services, technical support, and consultations in relation to software developed or distributed by the Processor, as well as services provided or work performed by the Processor
- management of data subjects' participation in events hosted by the Processor
- registration on the website(s)
- subscriptions to the Processor's newsletter
- applications for the Processor's partner programs
- storage of electronic documents, knowledge bases in the document management system and/or file storage
- ordering and sale of software developed or distributed by the Processor (including provision to employees), as well as services provided or work performed by the Processor, through online stores
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- processing for statistical purposes relating to the composition and volume of software developed or distributed by the Processor, as well as services provided or work performed by the Processor; distribution of advertising materials; complaint handling
- monitoring of the Processor's website; processing for statistical purposes and other website analytics; feedback; registration of data subjects for events
- software development; provision of services; performance of work; and software licensing (including provision of access to software downloads)
- demonstrations of solutions to potential users of software, services, or work provided by the Processor.

4. LEGAL GROUNDS FOR PERSONAL DATA PROCESSING

4.1. The Processor processes personal data in accordance with the following laws and regulations:

- Article 65, Articles 86-90 of the Labor Code of the Russian Federation
- Tax Code of the Russian Federation
- Civil Code of the Russian Federation
- Mandatory Pension Insurance Federal Act No. 167-FZ as of December 15, 2001
- Article 13, Mandatory Social Insurance for Temporary Disability or Maternity Federal Law No. 255-FZ as of December 29, 2006
- Article 8, Defense Federal Act No. 61-FZ as of , of May 31, 1996
- Accounting Federal Act No. 402-FZ as of dated December 6, 2011
- Consent to the processing of personal data
- Russian National Statistics Committee Directive No. 1 Approved Forms of Primary Accounting Records for Labor and Payroll as of January 5, 2004.
- Agreement with the data subject
- Agreement between the Processor and a third party (legal entity).
- Agreement between the Processor and the customer (individual, sole proprietor).

5. SCOPE AND CATEGORIES OF PERSONAL DATA. CATEGORIES OF DATA SUBJECTS

5.1. The Processor processes the following categories of personal data:

Data subject category	Personal data category	Scope
Current and former employees	Other categories	Less than 100,000 subjects
Immediate family members of employees	Other categories	Less than 100,000 subjects

Data subject category	Personal data category	Scope
Applicants (candidates for vacancies)	Other categories	Less than 100,000 subjects
Individuals performing work under commercial contracts	Other categories	Less than 100,000 subjects
Customer agents (representatives and/or employees of third parties)	Other categories	Less than 100,000 subjects
Customers (individuals, sole proprietors, and employees of third parties)	Other categories	Less than 100,000 subjects
Suppliers (representatives and/or employees of third parties)	Other categories	Less than 100,000 subjects
Visitors and/or users of the Processor's website	Other categories	More than 100,000 subjects
Employees of the group's companies and/or affiliates	Other categories	Less than 100,000 subjects

5.2. The data subject accepts the terms of this Policy and provides the Processor with specific, informed, freely given, and unambiguous consent to the processing of personal data through the web resources owned by ASCON Design Systems LLC, its subsidiaries, and affiliates, in the circumstances and for the purposes set out in Clause 31 herein and the consent forms:

Circumstances in which consent for personal data processing is given (general description of the purposes set out in Clause 3.1 herein)	Consent for Personal Data Processing Form
Registration on the Website, in a user account on the user support service website, or other online resources; sending notifications upon software license registration; registration in the Processor's internal information systems	Selecting the checkbox next to "I agree to the processing of my personal data in accordance with the Privacy Policy" and then clicking the "Register" button or a similar button
modifying or adding information in the "Personal Information" section of the user account	modifying or adding information and clicking the "Save changes" button or a similar button
any use of the Website or other online resources through which personal data is automatically transmitted to the Processor via software installed on the data subject's device	Clicking the "I agree to accept cookies" button or a similar button
Subscribing to newsletters from the Processor	Filling out the form to subscribe to the newsletter and selecting the box next to "I agree to the processing of my personal data in accordance with the Privacy Policy."

5.3. Personal data categories by purpose

Purpose of Personal Data Processing (General description of the purposes specified in detail in Section 3.1 herein)	Personal Data Categories (A specific set of categories may vary depending on the Processor's online resource, and/or website, and/or information system)
user registration and identification on the Website, in a user account on the user support service website, or other online resources; registration in the Processor's internal information systems; and providing access to fully use the relevant resources of the Website or the Processor's information systems	Citizenship Last name, first name, middle name (patronymic) Gender Phone number Email Date of birth Place of birth * ID document details * Registered address * Residential address Educational background and educational institutions attended * Job (employer) Position Work experience * Term of employment * Photo * Credentials (login, password) Tax ID * Social security number * logins and registrations on social media or messaging platforms (e.g., Telegram, MAX, MoodleNet, ICQ, Skype, AIM, Yahoo, MNS, and similar)

Purpose of Personal Data Processing (General description of the purposes specified in detail in Section 3.1 herein)	Personal Data Categories (A specific set of categories may vary depending on the Processor's online resource, and/or website, and/or information system)
Upon activating the software through license registration or providing the license serial number	Job (employer) Last name, first name, middle name (patronymic) Phone number Email. city of registered address time zone employer's registered address.
Establishing and maintaining communication between the data subject and the Processor; providing advice or support to the data subject	Last name, first name, middle name (patronymic) Phone number Email
Statistical and other studies that used anonymized personal data	Cookie files

* Employee personal data categories.

6. TERMS AND CONDITIONS FOR PERSONAL DATA PROCESSING

- 6.1. Personal data are processed legitimately and fairly.
- 6.2. Personal data are processed with the consent of the data subject.
- 6.3. Personal data processing is limited to specific, predetermined, and legitimate purposes. Personal data processing for other purposes is not permitted.
- 6.4. Databases containing personal data processed for incompatible purposes must not be merged.
- 6.5. Only personal data that are adequate, relevant, and limited to the purposes of processing may be processed.
- 6.6. The content and scope of personal data must be adequate, relevant, and not excessive in relation to the purposes of processing.
- 6.7. When processing personal data, the Processor ensures that the data are accurate, complete, and, where necessary, relevant to the purposes of processing. The Processor takes measures to correct or erase personal data that are incomplete or inaccurate.
- 6.8. The Processor may create publicly accessible sources of personal data (e.g., catalogs, databases, or pages on the Processor's website). Only personal data for which the data subject has provided written consent to be included in publicly accessible sources may be included.
- 6.9. Personal data that can be linked to a data subject are retained no longer than necessary for the purposes of processing, unless a retention period is required by a federal act or by a contract to which the data subject is a party, beneficiary, or guarantor. Personal data must be erased or anonymized once the purposes of processing have been achieved, or if processing for these purposes is no longer required, unless otherwise provided by a federal act.
- 6.10. Where consent is required, the Processor obtains it in a demonstrable form (including the form specified in Section 5 of this Policy), except in cases where, in accordance with Russian law, only written consent to the processing of personal data is required.
- 6.11. Access to personal data processed by the Processor is granted solely to the Processor's employees whose job functions and responsibilities require them to process the personal data.
- 6.12. The Processor processes personal data, including by automated means, using personal data information systems protected in accordance with the security requirements set out in the regulatory and technical guidelines of the Federal Technical and Export Control Service (FSTEC) and the Federal Security Service (FSB) of Russia.
- 6.13. The Processor may subcontract the processing of personal data with the consent of the data subject. The contract with such a subcontractor must specify the personal data processing operations to be performed by the subcontractor, the purposes of processing, the subcontractor's obligations to maintain the confidentiality and security of personal data during processing, and the personal data protection requirements set out in Article 19, Personal Data Protection Federal Act.

7. TERMINATION OF PERSONAL DATA PROCESSING

7.1. The Processor terminates personal data processing in the following cases:

- Upon achievement of the purposes of processing or reaching the maximum retention period: within 30 days
- If processing is no longer necessary to achieve the purposes: within 30 days
- Upon provision by the data subject or their legal representative of information confirming that the personal data were obtained unlawfully or are unnecessary for the declared purposes: within 7 days
- If it is impossible to process personnel data lawfully: within 10 days
- Upon withdrawal of the consent by the data subject, if the personal data retention is no longer required for the purposes of processing: within 30 days
- Expiration of the statute of limitations for legal relationships in which the personal data were or are processed.

7.2. In accordance with Article 21, Part 5, Personal Data Processing Federal Act No. 152-FZ as of July 27, 2006, the Processor does not cease processing the Subject's data and does not destroy the data in the following cases:

- It is provided by a contract to which the Subject is a party, beneficiary, or guarantor
- The Processor has the right to process personal data without the consent of the Subject on the legal grounds provided for by federal acts
- The period for processing the Subject's personal data established by federal acts and regulations of the Russian Federation has not expired.

8. PERSONAL DATA SECURITY

8.1. To ensure the security of personal data, the Processor implements such organizational and technical measures as are necessary and sufficient to comply with the legal requirements for personal data protection and

8.2. To protect personal data against accidental or unauthorized access, destruction, alteration, blocking, and other unauthorized operations.

8.3. The Processor takes the following organizational and technical measures:

- Appoint officials responsible for secure personal data processing
- Restrict and document access to personal data to only those Processor employees specified in official records
- Familiarize the Processor's employees with the federal legislation and local regulations on personal data processing and security
- Track and maintain physical media containing personal data and their movement, and prevent theft, substitution, unauthorized copying, or destruction
- Detect security threats to personal data processed in personal data information systems (PDIS) and develop models of such threats
- Protect personal data processed in personal data information systems from unauthorized access
- Use cryptographic tools as required for secure personal data transmission over public communication channels and storage on removable media
- Apply antivirus tools to protect the corporate network from malware and backdoors
- install firewalls where appropriate
- Use intrusion detection systems on the corporate network, as necessary, to identify attempts to violate or facilitate violations of personal data security requirements
- Use information security audit tools
- Use data backup and data recovery tools
- Train the Processor employees in the use of PDIS information security tools
- Monitor the actions of PDIS users, investigate violations of personal data security requirements
- Install the personal data processing hardware in secured areas
- Ensure security equipment and alarm systems are kept fully operational at all times

9. RIGHTS OF DATA SUBJECTS

9.1. A data subject has the right to make queries about the processing of their personal data, including but not limited to:

- Confirmation of the personal data processing by the Processor
- Legal grounds and purposes of personal data processing

- Personal data processing purposes and procedures used by the Processor
- Name and address of the Processor; list of persons (excluding the Processor's employees) who have access to personal data or to whom personal data may be disclosed under a contract with the Processor or under applicable federal acts
- Personal data of the subject, the source of such data, unless federal acts provide a different procedure
- Personal data processing and retention periods
- Exercise of the data subject's rights under the Personal Data Protection Federal Act
- Actual or proposed transfer of personal data to third countries
- Full name and address of the person, if any, who processes or will process personal data on behalf of the Processor
- Other information specified in the Personal Data Protection Federal Act or other federal acts.

9.2. Data subjects have the right to:

- Withdraw the consent to personal data processing
- Require the Processor to notify all persons who have previously been provided with incorrect or incomplete personal data of any deletions, corrections, or additions made to such data
- If the data subject believes that the Processor is processing their personal data in violation of the Personal Data Protection Federal Act or otherwise infringing their rights and freedoms, the data subject has the right to appeal the Processor's actions or omissions to a supervisory authority (Federal Service for Supervision of Communications, Information Technology and Mass Media) or to bring a claim in court.
- The data subject has the right to require the Processor to correct, block, or delete their personal data if it is incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the stated purposes of processing, and to take any measures provided by law to protect their rights.

10. MISCELLANEOUS

- 10.1.** This Policy is publicly available and shall be published, including electronically, in the public section of the Processor's official website.
- 10.2.** The person responsible for personal data processing shall monitor compliance with this Policy.
- 10.3.** Other rights and obligations of the Processor are specified by the Personal Data Protection Federal Act and other personal data protection regulations.
- 10.4.** Officials who violate the rules on the processing and protection of personal data shall bear material, disciplinary, administrative, civil, or criminal liability in accordance with the procedures established by federal law.
- 10.5.** This Policy shall be revised as required in the event of changes to the regulatory and legal acts or guidance of the Russian Federation governing the processing and protection of personal data, or to the Company's Articles of Association.
- 10.6.** Any inquiries concerning this Policy should be emailed to the Processor at pravo@ascon.ru.

Policy updated on
December 12, 2025