

Personal Data Processing and Protection Policy and Cookie Usage Policy

www.cto-expo.ru

(hereinafter referred to as the "Policy")

1. General Provisions

1.1. This Personal Data Processing Policy is drafted in accordance with the Constitution of the Russian Federation, the Civil Code of the Russian Federation, the Federal Law "On Information, Information Technologies and Information Protection", Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" (hereinafter referred to as the "Personal Data Law"), and defines the procedure for processing personal data and measures to ensure the security of personal data undertaken by SIGMA EXPO GROUP LIMITED LIABILITY COMPANY (TIN: 7743378236, PSRN 1227700183215, address: 125504, Moscow, Internal Territory of Municipal District Zapadnoye Degunino, Dmitrovskoye Highway, Building 71B, Floor 4, Office 6, registration number in the Register of Personal Data Operators No. 77-22-085505, hereinafter referred to as the "Operator"), for individuals (hereinafter referred to as the "User", equivalent to the term "Personal Data Subject") when the User uses the Website: www.cto-expo.ru (hereinafter referred to as the "Website").

1.2. The Operator considers compliance with the rights and freedoms of individuals and citizens in the processing of their personal data, including the protection of the right to privacy, personal and family secrecy, as its most important goal and condition for carrying out its activities.

1.3. This Operator's Policy on the processing of personal data (hereinafter referred to as the "Policy") applies to all information that the Operator may receive about Users of the Website. The Policy applies to all personal data of Website Users that the Operator processes.

1.4. Before using the Website, the User (Personal Data Subject) must carefully review this Policy.

The User's use of any functions, services, and features of the Website, including any viewing of the Website page by the User, signifies the User's unconditional agreement with this Policy and the conditions for processing their personal information (personal data) specified therein.

The User's specified actions are regarded as the User's statement that they have read, understood, and agreed to comply with the Policy's terms, including all special conditions and rules mentioned therein, without any exceptions or reservations. In case of disagreement with these conditions, the User must refrain from using the Website's services.

Familiarization with the Policy does not constitute consent to the processing of personal data. Consent to the processing of personal data is obtained by the Operator separately in the manner established by Article 9 of Federal Law No. 152-FZ of July 27, 2006.

1.5. This Policy applies only to the Website.

The Website does not control and is not responsible for third-party websites to which the User may navigate via links available on the Website.

1.6. The Policy applies to relations in the field of personal data processing that arose for the Operator both before and after the approval of this Policy.

2. Basic Terms Used in the Policy

2.1. **Operator** – SIGMA EXPO GROUP LIMITED LIABILITY COMPANY (TIN: 7743378236, PSRN 1227700183215, address: 125504, Moscow, Internal Territory of Municipal District Zapadnoye Degunino, Dmitrovskoye Highway, Building 71B, Floor 4, Office 6, registration number in the Register of Personal Data Operators No. 77-22-085505), independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as determining the purposes of personal data processing, the composition of personal data to be processed, and actions (operations) performed with personal data.

2.2. **User** (equivalent to the terms "Website User", "Website Visitor") – any visitor to the Website.

2.3. **Personal Data** – any information relating directly or indirectly to a User of the Website.

2.4. **Personal Data Permitted by the Personal Data Subject for Distribution** – personal data to which access by an unlimited number of persons is provided by the Personal Data Subject by giving consent to the processing of personal data permitted by the Personal Data Subject for distribution in the manner prescribed by the Personal Data Law (hereinafter referred to as personal data permitted for distribution).

2.5. **Automated Processing of Personal Data** – processing of personal data using computer technology.

2.6. **Personal Data Information System** – a set of personal data contained in databases, and information technologies and technical means that ensure their processing.

2.7. **Processing of Personal Data** – any action (operation) or set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, modification), extraction, use, transfer (provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.8. **Provision of Personal Data** – actions aimed at disclosing personal data to a specific person or a specific circle of persons.

2.9. **Depersonalization of Personal Data** – actions as a result of which it is impossible to determine, without using additional information, the belonging of personal data to a specific User or other Personal Data Subject.

2.10. **Blocking of Personal Data** – temporary cessation of personal data processing (except in cases where processing is necessary to clarify personal data).

2.11. **Distribution of Personal Data** – any actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or familiarization with personal data of an unlimited circle of persons, including publication of personal data in mass media, placement in information and telecommunication networks, or provision of access to personal data in any other way.

2.12. **Cross-Border Transfer of Personal Data** – transfer of personal data to the territory of a foreign state, to a foreign state authority, a foreign individual, or a foreign legal entity.

2.13. **Destruction of Personal Data** – any actions as a result of which personal data is irretrievably destroyed with the impossibility of further restoration of the content of personal data in the personal data information system and (or) material carriers of personal data are destroyed.

2.14. **Cookies** – a small piece of data sent by a web server and stored on the User's computer, which the web client or web browser sends to the web server in an HTTP request each time when attempting to open a page of the corresponding Website. The Personal Data Subject has the ability to prohibit the creation of cookie files or delete existing ones by using the appropriate web browser settings; however, in this case, full use of all the functionality of the Internet service will be impossible.

2.15. **Confidentiality of Personal Data** – a requirement mandatory for the Operator or another person who has gained access to personal data not to allow their distribution without the consent of the Personal Data Subject or the presence of another legal basis.

3. Basic Rights and Obligations of the Operator

3.1. The Operator has the right to:

1. Receive reliable information and/or documents containing personal data from the Personal Data Subject;
2. Entrust the processing of personal data to another person with the consent of the Personal Data Subject, unless otherwise provided by federal law, on the basis of an agreement concluded with this person. The person processing personal data on behalf of the Operator must comply with the principles and rules for processing personal data provided for by the Personal Data Law;
3. In case of withdrawal by the Personal Data Subject of 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;
4. Independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations provided for by the Personal Data Law and 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 obliged to:

1. Provide the Personal Data Subject, upon their request, with information regarding the processing of their personal data;
2. Organize the processing of personal data in the manner established by the current legislation of the Russian Federation;
3. Respond to requests and inquiries from Personal Data Subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
4. Report the necessary information to the authorized body for the protection of the rights of Personal Data Subjects at the request of this body;
5. Publish or otherwise provide access to the Personal Data Subjects to this Policy on the processing of personal data;

6. Take legal, organizational, and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data;
7. Cease the transfer (provision, access) of personal data, cease processing, and destroy personal data in the manner and cases provided for by the Personal Data Law;
8. Report the necessary information to the authorized body for the protection of the rights of Personal Data Subjects (Federal Service for Supervision of Communications, Information Technology and Mass Media - Roskomnadzor) upon request within 30 (thirty) days from the date of receipt of such request. This period may be extended to 45 days upon sending a reasoned notification to Roskomnadzor about the reasons for the extension (Part 4 of Article 20 of Federal Law No. 152-FZ of July 27, 2006). In case of a request in connection with a personal data breach, the Operator is obliged to respond: within 1 (one) day if a primary notification of the breach has not yet been submitted; within 3 (three) days for clarifying information on a previously submitted notification.

When the Operator, Roskomnadzor, or another interested party identifies a fact of unlawful or accidental transfer (provision, distribution) of personal data (access to personal data) that resulted in a violation of the rights of personal data subjects (hereinafter referred to as an "incident"), the Operator:

a) within 24 (twenty-four) hours from the moment of detecting the incident, notifies Roskomnadzor of the incident that occurred, reporting the following information:

- The presumed reasons that led to the violation of the rights of personal data subjects;
- The presumed harm caused to the rights of personal data subjects;
- Measures taken to eliminate the consequences of the incident;
- Information about the person authorized by the Operator to interact with Roskomnadzor on issues related to the incident;

b) within 72 (seventy-two) hours from the moment of detecting the incident, notifies Roskomnadzor of the results of the internal investigation of the identified incident and provides information about persons whose actions caused it (if available);

3.2.9. In the manner determined by the federal executive body authorized in the field of security (FSB of Russia), ensure interaction with the state system for detecting, preventing, and eliminating the consequences of computer attacks on information resources of the Russian Federation, including informing this system of computer incidents that resulted in unlawful transfer (provision, distribution, access) of personal data (in accordance with Part 1.1 of Article 18.1 of Federal Law No. 152-FZ of July 27, 2006);

10. Fulfill other obligations provided for 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 their personal data, except in cases provided for by federal laws. Information is provided to the Personal Data Subject by the Operator in an accessible

form, and it should not contain personal data relating to other Personal Data Subjects, except in cases where there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Personal Data Law;

4.1.2. Require the Operator to clarify their personal data, block it, or destroy it if the personal data is incomplete, outdated, inaccurate, unlawfully obtained, or is not necessary for the stated purpose of processing, and also take measures provided by law to protect their rights;

4.1.3. Put forward a condition of prior consent when processing personal data for the purpose of promoting goods, works, and services in the market;

4.1.4. Withdraw consent to the processing of personal data;

4.1.5. Appeal to the authorized body for the protection of the rights of Personal Data Subjects or in court against unlawful actions or inaction of the Operator in the processing of their personal data;

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

4.1.7. The User may at any time withdraw their consent to the processing of personal data by sending the Operator a notification via email to info@cto-expo.ru with the note "Withdrawal of consent to the processing of personal data".

Upon receipt of such notification, the Operator ceases processing personal data in accordance with the requirements of Part 5 of Article 21 of the Personal Data Law (within 30 (thirty) calendar days).

4.2. Personal Data Subjects are obliged to:

4.2.1. Provide the Operator with reliable data about themselves;

4.2.2. Inform the Operator of any clarification (update, modification) of their personal data.

4.3. Persons who have provided the Operator with false information about themselves or information about another Personal Data Subject without the latter's consent bear responsibility in accordance with the legislation of the Russian Federation.

4.4. Control over the implementation of the requirements of this Policy is carried out by an authorized person responsible for organizing the processing of personal data at the Operator.

4.5. Liability for violation of the requirements of the legislation of the Russian Federation and regulatory acts of the Operator in the field of processing and protection of personal data is determined in accordance with the legislation of the Russian Federation.

5. List of Personal Data

5.1. The Operator may process the following personal data of the Website User:

- Last name, first name, patronymic;
- Telephone number;
- Email address;
- Cookie files;

- IP address of computer/mobile device (when visiting the Website).

The above-mentioned data are hereinafter referred to in the Policy by the general concept of "Personal Data". Delivery address is processed exclusively for the purposes of delivering the ordered Goods and is not used for marketing purposes without separate consent of the User.

5.2. The Operator does not process special categories of personal data relating to racial, national origin, political views, religious or philosophical beliefs, or intimate life.

The Operator does not process biometric personal data (information that characterizes the physiological and biological characteristics of a person, on the basis of which their identity can be established).

5.3. The processing of personal data permitted for distribution from among the special categories of personal data specified in Part 1 of Article 10 of the Personal Data Law is allowed if the prohibitions and conditions provided for in Article 10.1 of the Personal Data Law are observed.

5.4. The User's consent to the processing of personal data permitted for distribution is formalized separately from other consents to the processing of their personal data. In this case, the conditions provided for, in particular, in Article 10.1 of the Personal Data Law are observed. The requirements for the content of consent to the processing of personal data permitted by the Personal Data Subject for distribution were approved by Order of Roskomnadzor No. 18 of February 24, 2021.

5.4.1. Consent to the processing of personal data permitted for distribution is provided by the User to the Operator directly through the Website.

5.4.2. The transfer (distribution, provision, access) of personal data permitted by the Personal Data Subject for distribution must be stopped at any time at the request of the Personal Data Subject. This requirement must include the last name, first name, patronymic (if any), contact information (telephone number, email address, or postal address) of the Personal Data Subject, as well as a list of personal data whose processing is subject to termination. The personal data specified in this requirement may be processed only by the Operator to whom it is sent.

5.4.3. Consent to the processing of personal data permitted for distribution ceases to be effective from the moment the Operator receives the requirement specified in clause 5.4.2 of this Policy regarding the processing of personal data.

5.5. Logging and Documentation of User Consents

5.5.1. Logging Process

Each time a User registers for an event, subscribes to a mailing list, or fills out forms on the Website by checking consent checkboxes, the Operator automatically registers (logs) the following information:

- a) IP address of the User's computer or mobile device;
- b) Exact date of consent provision;
- c) Exact time (hours, minutes, seconds) of consent marking;
- d) Version of this Policy (number or version date) with which the User agreed;
- e) Browser session identifier (session ID) for authenticity verification;

f) Which specific checkboxes were checked (for personal data processing, for receiving marketing messages, for receiving advertising via electronic communications networks, etc.);

g) Event participant registration identifier or application number in the Operator's system.

This data is automatically recorded in a secure database without User participation.

5.5.2. Purpose of Logging

Consent logging is carried out for the purposes of:

- a) Documenting the fact of receiving consent from the User;
- b) Compliance with the requirements of Federal Law No. 152-FZ "On Personal Data" and Federal Law No. 38-FZ "On Advertising";
- c) Proving voluntary and informed consent in case of disputed situations;
- d) Protecting the rights of both the Operator and the User.

5.5.3. Retention Period for Consent Evidence

The Operator stores complete records of all User consents for at least 3 (three) years from the end of the validity period of the consent or the terms of personal data processing, in accordance with the requirements of current legislation of the Russian Federation (Order of Roskomnadzor No. 236-p of September 10, 2019). After this period, records are deleted or archived.

5.5.4. User's Right to Information about Logging

The User may request a copy of the logging of their consents by sending a letter to the Operator's email address or calling the phone number specified in Section 13 of this Policy. The request must contain the participant's registration identifier or application number in the system.

The Operator provides information about logging within 10 (ten) business days in accordance with the requirements of clause 10.13 of this Policy.

6. Principles of Personal Data Processing

6.1. The processing of personal data is carried out on a legal basis.

6.2. The processing of personal data is limited to achieving specific, predetermined, and lawful purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not allowed.

6.3. The combination of databases containing personal data, the processing of which is carried out for purposes incompatible with each other, is not allowed.

6.4. Only personal data that meets the purposes of their processing are subject to processing.

6.5. The content and volume of processed personal data correspond to the stated purposes of processing. The processed personal data must not be excessive in relation to the stated purposes of their processing.

6.6. When processing personal data, the accuracy of personal data, their sufficiency, and, when necessary, relevance in relation to the purposes of personal data processing are ensured. The Operator

takes necessary measures and/or ensures their adoption to remove or clarify incomplete or inaccurate data.

6.7. Storage of personal data is carried out in a form that allows identification of the Personal Data Subject, no longer than the purposes of personal data processing require, unless the storage period of personal data is established by federal law, an agreement to which the Personal Data Subject is a party, beneficiary, or guarantor.

6.8. Processed personal data is destroyed or depersonalized in case of:

- Provision by the User of information confirming that personal data was unlawfully obtained or is not necessary for the stated purpose of processing - within 7 (seven) business days from the date of submission of such information (Part 1 of Article 14, Part 3 of Article 20 of the Personal Data Law);
- Detection of unlawful processing of personal data - within 3 (three) business days (Part 3 of Article 21 of the Personal Data Law);
- Withdrawal of personal data by the User - within 30 (thirty) calendar days (Part 5 of Article 21 of the Personal Data Law);
- Achievement of the purpose of personal data processing - within 30 (thirty) days (Part 4 of Article 21 of the Personal Data Law);
- Expiration of personal data storage periods - within 30 (thirty) days (Part 4 of Article 21 of the Personal Data Law).

6.9. Personal data that was processed in an automated manner is destroyed by the Operator by erasing from the database, formatting the medium, or by mechanical damage to hard disks.

Personal data that was processed in a non-automated manner is destroyed by the Operator by shredding (grinding).

Destruction of personal data is carried out based on a decision of a special commission created by the Operator and is formalized by an Act on the destruction of personal data.

7. Purposes of Personal Data Processing

7.1. The processing of personal data is limited to achieving specific, predetermined, and lawful purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not allowed.

7.1.1. Purpose of data processing No. 1: Preparation, conclusion, and execution of a civil law contract;

List of personal data: last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; gender; email address; residential address; registration address; telephone number; SNILS (State Pension Insurance Number); TIN (Taxpayer Identification Number); citizenship; identity document data; bank card details; bank account number; personal account number; position;

Categories of subjects whose personal data are processed: counterparties; representatives of counterparties; clients; beneficiaries under agreements; Website users;

List of actions: collection; recording; systematization; accumulation; storage; clarification (update, modification); extraction; use; transfer (provision, access); depersonalization; blocking; deletion; destruction;

Processing methods: mixed; with transmission via the internal network of the legal entity; with transmission via the Internet;

Processing period: the period is defined in clause 10.6 of this Policy;

Personal data is destroyed by the methods specified in clause 6.9 of this Policy.

7.1.2. Purpose of data processing No. 2: Registration, collection, and formation of information about counterparties (suppliers, contractors, contracting organizations, partners, clients), including collection and systematization of data, creation and maintenance of a counterparty database, verification of financial and legal reliability of counterparties, verification of contact information, maintenance of a counterparty register for the purposes of concluding, executing, managing civil law contracts, and monitoring the fulfillment of obligations by the parties;

List of personal data: last name, first name, patronymic, email address, telephone number;

Categories of subjects whose personal data are processed: counterparties; representatives of counterparties, exhibitors, representatives of exhibitors; Website users;

List of actions: collection; recording; systematization; accumulation; storage; clarification (update, modification); extraction; use; transfer (provision, access); depersonalization; blocking; deletion; destruction;

Processing methods: mixed; with transmission via the internal network of the legal entity; with transmission via the Internet;

Processing period: the period is defined in clause 10.6 of this Policy;

Personal data is destroyed by the methods specified in clause 6.9 of this Policy.

7.1.3. Purpose of data processing No. 3: Promotion of goods, works, and services in the market;

List of personal data: last name, first name, patronymic; email address; telephone number;

Categories of subjects whose personal data are processed: counterparties; representatives of counterparties; clients; beneficiaries under agreements; Website users;

List of actions: collection; recording; systematization; accumulation; storage; clarification (update, modification); extraction; use; transfer (provision, access); depersonalization; blocking; deletion; destruction;

Processing methods: mixed; with transmission via the internal network of the legal entity; with transmission via the Internet;

Processing period: the period is defined in clause 10.6 of this Policy;

Personal data is destroyed by the methods specified in clause 6.9 of this Policy.

7.1.4. Purpose of data processing No. 4: Organization, preparation, and holding of exhibition, congress, and other business events, including:

a) Registration, accreditation, and access control of event participants (exhibitors, representatives of exhibitors, visitors, speakers, journalists);

b) Collection and processing of information necessary for the preparation and holding of events, including information about professional interests, companies, positions, experience, and field of activity of participants;

c) Direct contacts with personal data subjects via email, phone calls, SMS, messengers, and other means of communication for the purposes of informing about:

- Terms of participation, rules, technical regulations, and event requirements;
- Program, schedule, timetable, and venue of the event;
- Status of consideration of applications and registration forms;
- Confirmation of participation and sending of tickets/passes;
- Reminders about dates, times, and venue of the event;
- Changes in the program, schedule, speaker composition, and force majeure circumstances;
- Collecting feedback, surveying participants, and quality surveys of the event;
- Sending event materials (program, schedule, participant list, access conditions to materials);
- Results and outcomes of the event, gratitude to participants;
- Offering participation in future Operator events;

d) Maintaining a register and database of event participants, documenting participation history in Operator events, analyzing participation for the purposes of planning future events;

e) Interaction with exhibitor representatives, including coordination of terms and costs of participation, technical and logistical requirements, parameters of booth space, exposition placement rules;

f) Ensuring security, protection, and access control at the event, including entrance control, accreditation verification;

g) Organization of networking and establishment of business contacts, including formation and provision to participants (with their consent) of lists of other participants, contact information, and information about companies for the purposes of developing business connections and cooperation;

h) Preparation of reports, analysis of event effectiveness, including preparation of attendance statistics, survey results, information about participants;

List of personal data: last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; gender; email address; residential address; registration address; telephone number; SNILS; TIN; citizenship; identity document data; bank card details; bank account number; personal account number; position; health information;

Categories of subjects whose personal data are processed: counterparties; representatives of counterparties; clients; beneficiaries under agreements; event participants, including potential event participants, event guests; exhibitors, representatives of exhibitors; Website users;

List of actions: collection; recording; systematization; accumulation; storage; clarification (update, modification); extraction; use; transfer (provision, access); depersonalization; blocking; deletion; destruction;

Processing methods: mixed; with transmission via the internal network of the legal entity; with transmission via the Internet;

Processing period: the period is defined in clause 10.6 of this Policy;

Personal data is destroyed by the methods specified in clause 6.9 of this Policy.

7.1.5. Purpose of data processing No. 5: Providing users with access to the Operator's Website services, including:

- a) Processing requests received through feedback forms, event registration forms, mailing list subscription forms, service order forms, and other web forms posted on websites;
- b) Providing access to information and materials posted on websites, including articles, news, exhibition participant catalogs, event programs, electronic versions of magazines, video materials, event archives;
- c) User registration, creation and management of personal accounts on the Website, saving user settings, and interface personalization;
- d) Posting and moderation of comments, reviews, and other materials posted by users on websites;
- e) Ensuring the technical functioning of websites, protection against unauthorized access, prevention of fraud and abuse;
- f) Operation with social network services included in the Register of social networks according to Article 10.6 of Federal Law No. 149-FZ of July 27, 2006 "On Information, Information Technologies and Information Protection", including integration of widgets, "Share" buttons, authorization through social networks, publication of content on social networks;
- g) Collection and analysis of data on website traffic, user behavior, viewing statistics using web analytics services (Yandex.Metrica and other analytics systems) for the purposes of improving website quality, increasing usability, identifying technical problems;
- h) Targeting and content personalization based on user interests, visit history, professional affiliation;
- i) Processing of cookie files, pixels, and other tracking technologies for the purposes of technical operation of websites, web analytics, remembering user settings, displaying personalized content;

List of personal data: last name, first name, patronymic; email address; telephone number; position, cookie files;

Categories of subjects whose personal data are processed: Website users; users of social networks included in the Register of social networks according to Article 10.6 of Federal Law No. 149-FZ of July 27, 2006 "On Information, Information Technologies and Information Protection";

List of actions: collection; recording; systematization; accumulation; storage; clarification (update, modification); extraction; use; transfer (provision, access); depersonalization; blocking; deletion; destruction;

Processing methods: mixed; with transmission via the internal network of the legal entity; with transmission via the Internet;

Processing period: the period is defined in clause 10.6 of this Policy;

Personal data is destroyed by the methods specified in clause 6.9 of this Policy.

7.1.6. Purpose of data processing No. 6: Sending advertising and marketing messages of the Operator via email, including mailings about special promotions, offers, and Operator events;

List of personal data: last name, first name, patronymic; email address; telephone number; cookie files;

Categories of subjects whose personal data are processed: Website users;

List of actions: collection; recording; systematization; accumulation; storage; clarification (update, modification); extraction; use; transfer (provision, access); depersonalization; blocking; deletion; destruction;

Processing methods: mixed; with transmission via the internal network of the legal entity; with transmission via the Internet;

Processing period: the period is defined in clause 10.6 of this Policy;

Personal data is destroyed by the methods specified in clause 6.9 of this Policy.

7.1.7. Purpose of data processing No. 7: Formation of reference materials for internal information support of the Operator's activities;

List of personal data: last name, first name, patronymic, year of birth, month of birth, date of birth, email address, telephone number, position, other personal data (specific category is indicated); photograph, workplace information;

Categories of subjects whose personal data are processed: employees of organizations in contractual relations with the Operator (employees of counterparties); Website users;

List of actions: collection, recording, systematization, accumulation, storage, clarification (update, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction;

Processing methods: mixed; with transmission via the internal network of the legal entity; with transmission via the Internet;

Processing period: the period is defined in clause 10.6 of this Policy;

Personal data is destroyed by the methods specified in clause 6.9 of this Policy.

7.2. The Operator also has the right 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 sending the Operator a letter to the email address: info@cto-expo.ru, with the note "Refusal of notifications about new products and services and special offers".

7.2.1. Marketing and Advertising Messages

If the User has given separate consent to the processing of personal data for the purpose of promoting services (Article 15 of Federal Law No. 152-FZ) and consent to receive advertising via electronic communications networks (Article 18 of Federal Law No. 38-FZ), the Operator processes their personal data (full name, phone number, email) to send advertising and marketing information about:

- a) Upcoming CTO Expo exhibitions and events;
- b) Terms of participation and special offers for exhibitors and visitors;
- c) Business program, conferences, and seminars within the exhibition;
- d) CTO Expo competitions and promotional campaigns;

- e) New services and opportunities for exhibition participants;
- f) Partner events and construction industry news.

Such messages are sent through the following channels (at the Operator's choice):

- SMS messages to the phone number;
- Email letters to the email address;
- Messages on social networks (if the User is subscribed to the Operator's official accounts).

The User may at any time refuse such messages in accordance with the terms of this Policy (Section 10.16). Refusal of advertising messages does not affect the ability to receive the Operator's services.

The Operator does not send marketing messages to Users who have not given consent or have unsubscribed from them.

7.3. Anonymized User data collected using Internet statistics services is used to collect information about User actions on the Website, improve the quality of the Website and its content.

7.4. The content and volume of processed personal data must correspond to the stated purposes of processing provided for in clause 7.1 of this Policy. The processed personal data must not be excessive in relation to the stated purposes of their processing.

7.5. It is prohibited to refuse data processing (service) if the Personal Data Subject refuses to provide biometric personal data and (or) give consent to the processing of personal data, if in accordance with federal law obtaining consent from the Operator for the processing of personal data is not mandatory.

8. Legal Grounds for Personal Data Processing

8.1. The legal basis for the processing of personal data is a set of regulatory legal acts, in pursuance of which and in accordance with which the Operator processes personal data, including:

- Constitution of the Russian Federation;
- Civil Code of the Russian Federation;
- Labor Code of the Russian Federation;
- Tax Code of the Russian Federation;
- Federal Law No. 152-FZ of July 27, 2006 "On Personal Data";
- Federal Law No. 149-FZ of July 27, 2006 "On Information, Information Technologies and Information Protection";
- Federal Law No. 38-FZ of March 13, 2006 "On Advertising" (in particular, Article 18 on information messages with consent);
- "Requirements for the protection of personal data during their processing in personal data information systems", approved by Resolution of the Government of the Russian Federation No. 1119 of November 1, 2012;
- Local acts of the Operator;
- Other regulatory legal acts regulating the activities of the Operator;
- Agreements concluded between the Operator and Personal Data Subjects;

- Consent of the Personal Data Subject to the processing of their personal data.

9. Conditions for Personal Data Processing

9.1. The processing of personal data is carried out with the consent of the Personal Data Subject to the processing of their personal data.

9.2. The processing of personal data is necessary to achieve the purposes provided for by an international treaty of the Russian Federation or by law, to carry out the functions, powers, and duties assigned to the Operator by the legislation of the Russian Federation.

9.3. The processing of personal data is necessary for the execution of an agreement to which the Personal Data Subject is a party or beneficiary, 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.

9.4. 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 significant goals, provided that the rights and freedoms of the Personal Data Subject are not violated.

9.5. The Operator processes personal data to which access by an unlimited number of persons is provided by the Personal Data Subject or at their request (hereinafter referred to as "Publicly Available Personal Data").

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

10. Procedure for Collection, Storage, Transfer, and Other Types of Personal Data Processing

10.1. The Operator takes necessary legal, organizational, and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, distribution, and other unauthorized actions, including:

- Determines threats to the security of personal data during their processing;
- Adopts local regulations and other documents regulating relations in the field of processing and protection of personal data.

The local acts of the Operator may not include provisions restricting the rights of the Personal Data Subject;

- Appoints persons responsible for ensuring the security of personal data in the structural divisions and information systems of the Operator;
- Creates the necessary conditions for working with personal data;
- Organizes the accounting of documents containing personal data;
- Organizes work with information systems in which personal data is processed;

- Stores personal data under conditions that ensure their safety and exclude unauthorized access to them;
- Organizes internal control and (or) audit of compliance of personal data processing with the Personal Data Law and regulatory legal acts adopted in accordance with it, requirements for the protection of personal data, the Operator's policy on personal data processing, and local regulatory acts of the Operator;
- Determines the assessment of harm that may be caused to Personal Data Subjects in case of violation of personal data handling rules, the ratio of said harm and measures taken by the Operator aimed at ensuring the fulfillment of obligations provided for by the Personal Data Law;
- Organizes familiarization of employees directly engaged in the processing of personal data with the provisions of the legislation of the Russian Federation on personal data, including requirements for the protection of personal data, documents defining the Operator's policy on personal data processing, local acts on personal data processing issues, and (or) training of these employees;
- Notifies Roskomnadzor of unlawful personal data leaks that resulted in a violation of the rights of Personal Data Subjects, of the presumed reasons, harm, results of its investigation, and measures to eliminate the consequences;
- Ensures interaction with the state system for detecting, preventing, and eliminating the consequences of computer attacks on information resources of the Russian Federation, including informing Roskomnadzor of computer incidents that resulted in unlawful transfer (provision, distribution, access) of personal data.

10.2. The security of personal data processed by the Operator is ensured by the implementation of legal, organizational, and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.

10.3. The Operator ensures the safety of personal data and takes all possible measures to exclude access to personal data by unauthorized persons.

10.4. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the execution of current legislation or if the Personal Data Subject has given the Operator consent to transfer data to a third party to fulfill obligations under a civil law contract.

10.5. In case of detection of inaccuracies in personal data, the User can update them independently by sending the Operator a notification to the Operator's email address: info@cto-expo.ru, with the subject "Update of personal data".

In case of detection of inaccurate personal data upon appeal of the Personal Data Subject or their representative or at their request or at the request of Roskomnadzor, the Operator blocks personal data relating to this Subject from the moment of such appeal or receipt of the specified request for the period of verification, if blocking of personal data does not violate the rights and legitimate interests of the Personal Data Subject or third parties.

If the fact of inaccuracy of personal data is confirmed, the Operator, based on information provided by the Personal Data Subject or their representative or Roskomnadzor, or other necessary documents, clarifies the personal data within seven business days from the date of submission of such information and removes the blocking of personal data.

10.6. The period of personal data processing is determined by the achievement of the purposes for which the personal data was collected, unless another period is provided for by the agreement or current legislation. The User may at any time withdraw their consent to the processing of personal data by sending the Operator a notification via email to the Operator's email address: info@cto-expo.ru, with the subject "Withdrawal of consent to the processing of personal data".

10.7. All information 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 the Privacy Policy. The Personal Data Subject and/or User is obliged to independently and timely familiarize themselves with these documents. The Operator is not responsible for the actions of third parties, including the service providers specified in this clause.

10.8. Prohibitions established by the Personal Data Subject on the transfer (except for providing access), as well as on the processing or conditions of processing (except for gaining access) of personal data permitted for distribution, do not apply in cases of processing personal data in state, public, and other public interests determined by the legislation of the Russian Federation.

Transfer of personal data to inquiry and investigation bodies, the Federal Tax Service, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, and other authorized executive bodies and organizations is carried out in accordance with the requirements of the legislation of the Russian Federation.

10.9. The Operator ensures the confidentiality of personal data when processing personal data.

10.10. The Operator stores personal data in a form that allows identification of the Personal Data Subject no longer than the purposes of personal data processing require, unless the storage period of personal data is established by federal law, an agreement to which the Personal Data Subject is a party, beneficiary, or guarantor. When collecting personal data, including via the Internet, the Operator ensures recording, systematization, accumulation, storage, clarification (update, modification), and extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except in cases specified in the Personal Data Law.

10.11. A condition for terminating the processing of personal data may be the achievement of the purposes of personal data processing, expiration of the validity period of the consent of the Personal Data Subject or withdrawal of consent by the Personal Data Subject, as well as detection of unlawful processing of personal data.

10.12. Cross-border transfer of personal data.

The Operator does not carry out cross-border transfer of personal data.

10.13. Confirmation of the fact of personal data processing by the Operator, legal grounds and purposes of personal data processing, as well as other information specified in Part 7 of Article 14 of the Personal Data Law, are provided by the Operator to the Personal Data Subject or their representative upon application or upon receipt of a request from the Personal Data Subject or their representative. The Operator's response to a Subject's request (appeal) to provide information regarding the processing of their personal data must be given within ten business days from the moment of application or receipt by the Operator of a request from the Personal Data Subject or their representative. This period may be extended, but not more than five business days in case of sending a reasoned notification by the Operator to the address of the Personal Data Subject indicating the reasons for extending the period for providing the requested information. The response to the request is given in the form in which the request (appeal) was sent, or in the form specified in the request (appeal) itself.

The information provided does not include personal data relating to other Personal Data Subjects, except in cases where there are legal grounds for disclosing such personal data.

The request must contain:

- The number of the main document identifying the Personal Data Subject or their representative, information about the date of issue of the specified document and the body that issued it;
- Information confirming the participation of the Personal Data Subject in relations with the Operator (agreement number, date of conclusion of the agreement, verbal designation and (or) other information), or information otherwise confirming the fact of personal data processing by the Operator;
- Signature of the Personal Data Subject or their representative.

The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

If the appeal (request) of the Personal Data Subject does not reflect all necessary information in accordance with the requirements of the Personal Data Law or the Subject does not have access rights to the requested information, they are sent a reasoned refusal.

The right of the Personal Data Subject to access their personal data may be limited in accordance with Part 8 of Article 14 of the Personal Data Law, including if access of the Personal Data Subject to their personal data violates the rights and legitimate interests of third parties.

10.14. In case of detection of unlawful processing of personal data upon appeal (request) of the Personal Data Subject or their representative or Roskomnadzor, the Operator blocks unlawfully processed personal data relating to this Subject from the moment of such appeal or receipt of the request.

10.15. Upon achievement of the purposes of personal data processing, as well as in case of withdrawal by the Personal Data Subject of consent to their processing, personal data is subject to destruction if:

- Otherwise not provided for by an agreement to which the Personal Data Subject is a party, beneficiary, or guarantor;
- The Operator has no right to process without the consent of the Personal Data Subject on the grounds provided for by the Personal Data Law or other federal laws;
- Otherwise not provided for by another agreement between the Operator and the Personal Data Subject.

10.16. Data processing upon withdrawal of consent to marketing messages

10.16.1. If the User has unsubscribed from advertising messages or withdrawn consent to marketing processing:

- a) The Operator immediately (within 1 calendar day) ceases sending advertising and marketing messages;
- b) The User's phone number and email are added to the marketing block list;
- c) Personal data is retained for the purposes of:

- Execution of agreements for the provision of services for organizing participation in exhibition events (for the required period);
- Sending information and service messages about participation in events, application status, tickets, and passes;
- Maintaining accounting and tax reporting (in accordance with the Tax Code of the Russian Federation);
- Fulfillment of other obligations provided for by the legislation of the Russian Federation;

d) Personal data is deleted in accordance with clauses 6.8 and 10.15 of this Policy upon achievement of the storage purposes determined by the agreement or legislation.

10.16.2. Re-consent to marketing

If the User subsequently wishes to receive marketing messages again, they must:

- Explicitly give consent (check the corresponding checkbox when registering for an event or subscribing to a mailing list)
- Or send a letter to the Operator's email address with a request to subscribe them to the mailing list.

10.17. Transfer of personal data to third parties

The Operator transfers the User's personal data to the following categories of partners:

Purpose of processing	Partner (category)	Purpose of transfer	Address
Organization of exhibition events	Event venue (Crocus Expo IEC), exhibition organization partners, contractors for event support. The Operator transfers personal data to these persons who are independent operators and process data for their own purposes. Transfer is carried out with the consent of the personal data subject.	Ensuring access of participants to the exhibition, access control, booth organization, technical support of the event	Specified on Partners' Website
Registration and accreditation of participants	Partners for participant registration, event management systems (CRM systems for events)	Registration of exhibitors and visitors, badge processing, processing of participation applications	Based on entrustment agreements. The Operator entrusts personal data processing to these persons based on an entrustment agreement (Part 3 of Article 6 of Federal Law No. 152-FZ). The Operator is responsible for the actions of these persons.

Payment processing	Banks and payment systems (bank cards, acquiring systems, electronic payment services). The Operator transfers personal data to these persons who are independent operators and process data for their own purposes. Transfer is carried out with the consent of the personal data subject.	Acceptance of payments for exhibition participation, invoice processing, payment order processing	Specified on partners' Website
Request processing and support	Call centers and partners for technical and information support of event participants	Processing requests and appeals from participants, consultation on exhibition participation issues	Based on entrustment agreements. The Operator entrusts personal data processing to these persons based on an entrustment agreement (Part 3 of Article 6 of Federal Law No. 152-FZ). The Operator is responsible for the actions of these persons.
Statistics and analytics	Analytics systems (Yandex.Metrica, Yandex Cloud, web analytics systems). The Operator transfers personal data to these persons who are independent operators and process data for their own purposes. Transfer is carried out with the consent of the personal data subject.	Analysis of Website traffic, user behavior, service improvement, protection against automated requests	Specified on partners' Website
Website administration and support	Hosting providers, system administrators, information system developers	Development, administration, and technical support of the Website and Operator's services	Based on entrustment agreements. The Operator entrusts personal data processing to these persons based on an entrustment agreement (Part 3 of Article 6 of Federal Law No. 152-FZ). The Operator is responsible for the actions of these persons.

Marketing and event promotion	Email mailing services, SMS services, marketing campaign management systems	Sending marketing messages to participants (with consent), informing about events	Based on entrustment agreements. The Operator entrusts personal data processing to these persons based on an entrustment agreement (Part 3 of Article 6 of Federal Law No. 152-FZ). The Operator is responsible for the actions of these persons.
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Each of these companies has its own Privacy Policy, which the User can familiarize themselves with on their official Websites.

Transfer and entrustment of personal data processing to third parties is carried out with the consent of the personal data subject, obtained in accordance with the requirements of Article 9 of Federal Law No. 152-FZ. Consent is formalized in a separate document upon registration for an event, subscription to a mailing list, or conclusion of a service agreement.

The Personal Data Subject has the right to withdraw consent to the transfer of personal data to third parties at any time by sending a request in accordance with Section 13 of this Policy. Upon withdrawal of consent, the Operator ceases data transfer, except in cases where transfer is necessary for the execution of an agreement or required by law.

11. Cookie Files

11.1. The Operator's Website uses cookie collection and processing technology.

11.2. Except in cases specified in this Policy regarding confidentiality and cookie files, the cookie files used by the Operator are necessary for the functionality and effectiveness of the Website; these functional and/or operational cookie files will be removed from the Personal Data Subject's device upon completion of the browser session (session cookies).

11.3. The Operator uses cookie files to personalize the capabilities of the Website and possibly display appropriate advertising. The Operator uses cookie files and similar technologies, including mobile device identifiers, to identify Personal Data Subjects, improve the convenience of working with the Website, increase security, and possibly display advertising.

11.4. When first visiting the Website, the Operator invites the Personal Data Subject to review and accept the Policy on personal data processing and cookie file processing.

11.5. The Operator uses tracking technologies during the session and persistent tracking technologies. Tracking technologies (for example, cookie files) can be persistent (i.e., they remain on the Personal Data Subject's computer until they delete them) or temporary (i.e., they remain until the Personal Data Subject closes the browser).

11.6. Mandatory cookie files – are necessary for the normal functioning of the Website. The Operator may use mandatory cookie files to authenticate Personal Data Subjects, prevent fraudulent use of the Website, or provide certain Website functions.

11.7. Analytics and operational cookie files – allow the Operator to recognize Personal Data Subjects and track their transitions to the Website, helping to improve the Website's operation.

11.8. Functional cookie files – are used to recognize repeat visits to the Website. They allow personalizing the Website's content for Personal Data Subjects, addressing by name, and saving selected settings (for example, language or region).

11.9. Targeting cookie files – track the process of using the Website, opened pages, and used links.

11.10. Cookie files may be used to:

- Customize the content of Website pages in accordance with the preferences of Personal Data Subjects, as well as to recognize Personal Data Subjects;
- Create statistics that help understand how exactly Personal Data Subjects use the Website;
- Maintain the Personal Data Subject's session.

11.11. Disabling and/or blocking by the Personal Data Subject of the web browser option to accept data from cookie files means that the Personal Data Subject's use of the Website may be limited, in particular, some of its functions.

12. List of Actions Performed by the Operator with Obtained Personal Data

12.1. The Operator performs automated collection, recording, systematization, accumulation, storage, clarification (update, modification), extraction, use; transfer (provision, access); depersonalization; blocking; deletion; destruction.

12.2. The Operator performs automated processing of personal data with receipt and/or transmission of received information via information and telecommunication networks or without it.

13. Final Provisions

13.1. The User may obtain any clarifications on issues of interest regarding the processing of their personal data, refusal of advertising messages, or other issues by contacting the Operator in the following ways:

METHOD 1: Email

Message to: info@cto-expo.ru

Email subject: "Question about personal data" or corresponding issue.

METHOD 2: Phone call to manager

Phone: +7 495 120-37-87

Reception hours: 10:00–19:00 Moscow time (MSK)

Working days: Monday–Friday (except official public holidays of the Russian Federation).

A response to the letter is sent within 3 business days.

When calling, the response is received immediately during the conversation.

13.2. This document will reflect any changes to the Operator's Personal Data Processing Policy. The Operator has the right to make changes to this Privacy Policy without the User's consent. The new Privacy Policy comes into effect from the moment of its posting on the Website, unless otherwise provided by the new version of the Policy. The Policy is valid indefinitely until it is replaced by a new version.

13.3. The current version of the Policy is located on the Website at the link: <https://cto-expo.ru/>, and is available to the User for review.

13.4. Information about the Operator:

SIGMA EXPO GROUP LIMITED LIABILITY COMPANY (TIN: 7743378236, PSRN 1227700183215, address: 125504, Moscow, Internal Territory of Municipal District Zapadnoye Degunino, Dmitrovskoye Highway, Building 71B, Floor 4, Office 6, registration number in the Register of Personal Data Operators No. 77-22-085505, email: info@sigma-expo.ru)