

POLITICS

Processing of personal data

Medsi Group of Companies JSC

Moscow

2025

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1. General provisions

2.1. This Policy of Personal Data Processing at Medsi Group of Companies JSC (hereinafter referred to as the Policy) was developed in accordance with the requirements of Federal Law No. 27.07.2006 of 152-FZ (Federal Law) "On Personal Data" (hereinafter - Law No. 152-FZ) and by-laws, as well as in accordance with other federal laws and by-laws of the Russian Federation, which determine the cases and features of processing personal data and ensuring the security and confidentiality of personal data.

2.2. The Policy was developed in order to implement the requirements of the legislation in the field of processing and ensuring the security of personal data and the purpose of the Policy is to ensure the protection of human and civil rights and freedoms when processing his personal data in the Company.

2.3. Policy determines:

2.3.1. principles of personal data processing;

2.3.2. purposes, legal grounds and methods of personal data processing;

2.3.3. list of personal data subjects whose personal data are processed by the Company;

2.3.4. terms of personal data processing;

2.3.5. procedure and conditions for processing personal data;

2.3.6. rights and obligations of Medsi Group of Companies JSC (hereinafter referred to as the Company) and personal data subjects;

2.3.7. confidentiality and security of personal data.

2.4. The provisions of the Policy are the basis for organizing work on the processing of personal data in the Company, including for the development of internal (local) regulatory acts (orders, regulations, regulations, etc.) governing the process of processing personal data in the Company.

2.5. The provisions of the Policy are binding on all employees of the Company who have access to personal data. Employees of the Company shall be familiarized with the provisions of the Policy under signature.

2.6. The policy should be posted on the Company's website - <https://medsi.ru/> for unrestricted access by website visitors.

2.7. Ensuring the necessary and sufficient level of information security and information assets of the Company, which necessarily include personal data, is an essential condition for achieving the goals of the Company's activities.

2.8. The necessary and sufficient level of cybersecurity is determined by the Company based on the list of current threats to personal data processed by the Company and the levels of personal data security established in accordance with this list.

2. Terms, definitions and abbreviations

Term/Abbreviation	Definition/Interpretation
Automated personal data processing	Processing of personal data using computer equipment
Blocking personal data	Temporary termination of personal data processing (except if processing is necessary to clarify personal data)
Data assets	Data presented on any medium in a form that is of value to the Company and is in its possession
Information security (IS)	The ability of information assets to maintain confidentiality, integrity, and availability
Information resources	Any information recorded on any media and technologies that ensure its processing
Personal Data Information System (PDIS)	A set of personal data contained in databases and providing for their processing by information technologies and technical means
Company	Joint Stock Company Medsi Group of Companies
Privacy of personal data	Mandatory requirement for the operator or other person who has received access to personal data not to allow their distribution without the consent of the personal data subject or other legal basis
Supervisory authority	The body authorized to carry out state control (supervision) over the compliance of personal data processing with the requirements of the legislation of the Russian Federation on personal data (Roskomnadzor - Federal Service for Supervision in the Sphere of Telecom, Information Technologies and Mass Communications)
Personal data processing	Any action (operation) or combination of actions (operations) performed with or without the use of automation means with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), blocking, deletion, destruction of personal data
Operator	A state body, a municipal body, a legal entity or an individual who independently or jointly with other persons organize and (or) process personal data, as well as determine the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data

Term/Abbreviation	Definition/Interpretation
Personal Data	Any information relating directly or indirectly to an identified or identifiable individual (personal data subject)
Provision of personal data	Actions aimed at disclosure of personal data to a certain person or a certain circle of persons
Distribution of personal data	Actions aimed at disclosure of personal data to an indefinite number of persons
Personal data subject	An individual who is directly or indirectly identified, or identified by personal data
Cross-border transfer of personal data	Transfer of personal data to the territory of a foreign state to the authority of a foreign state, a foreign individual or a foreign legal entity
Destruction of personal data	Actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and/or as a result of which material media of personal data are destroyed

3. Principles of personal data processing

3.1. Personal data processing in the Company is carried out in compliance with the following principles established by the legislation of the Russian Federation:

3.1.1. personal data are processed legally and fairly;

3.1.2. processing of personal data is limited to the achievement of specific, predetermined and legitimate goals;

3.1.3. processing of personal data incompatible with the purpose of collecting personal data is not allowed;

3.1.4. it is not allowed to combine databases containing personal data, the processing of which is carried out for purposes incompatible with each other;

3.1.5. only personal data that meet the goals of their processing are subject to processing;

3.1.6. the content and volume of personal data processed correspond to the stated purposes of personal data processing and should not be excessive in relation to the stated purposes of their processing;

3.1.7. when processing personal data, the accuracy of personal data, their sufficiency, and, if necessary, relevance to the purposes of processing personal data are ensured. Company takes necessary measures to remove or clarify incomplete and/or inaccurate data;

3.1.8. storage of personal data in a form that allows determining the subject of personal data is carried out no longer than the purpose of their processing requires, if the period of storage of personal data is not established by federal law, a contract to which the subject of personal data is a party;

3.1.9. personal data processed shall be subject to destruction upon achievement of processing goals or in case of loss of the need to achieve these goals, unless otherwise provided by the legislation of the Russian Federation.

4. Purposes, legal grounds and methods of personal data processing

4.1. The Company processes personal data of personal data subjects for predetermined purposes. Depending on the specific purposes of personal data processing, such processing may include, in particular, performing all or some of the following actions (operations) with personal data: collection (receipt), recording, systematization, accumulation, storage, clarification (update, change), attraction, use, transfer (provision, distribution, access), blocking, depersonalization, deletion, destruction of personal data.

4.2. For each purpose of personal data processing, the following methods of personal data processing are provided: automated processing of personal data (using computer equipment) and manual processing of personal data (without the use of computer equipment) with recording of personal data on material media. The processing of personal data by the Company in an automated manner (in PDIS) and in a non-automated manner shall be carried out in compliance with the requirements of the legislation of the Russian Federation and the provisions of internal (local) regulatory documents (acts) of the Company governing the processing and protection of personal data. When processing personal data in an automated manner, the Company takes the necessary measures to ensure the security of the personal data being processed. Processing of personal data without the use of automation tools is carried out by the Company in accordance with Decree of the Government of the Russian Federation of 15.09.2008 No. 687 "On approval of the Regulation on the features of processing personal data carried out without the use of automation tools." The processing of personal data in a non-automated manner, including the storage of tangible personal data carriers, is carried out in premises that ensure their safety, with the ability to determine the places of storage of personal data in the manner prescribed by the legislation of the Russian Federation.

4.3. The legal grounds for processing personal data in the Company are:

- 4.3.1. Constitution of the Russian Federation;
- 4.3.2. Labor Code of the Russian Federation;
- 4.3.3. Civil Code of the Russian Federation;
- 4.3.4. Tax Code of the Russian Federation;
- 4.3.5. Federal Law of 01.04.1996 No. 27-FZ "On individual (personalized) accounting in the system of compulsory pension insurance and compulsory social insurance";
- 4.3.6. Federal Law of 06.12.2011 No. 402-FZ "On Accounting";
- 4.3.7. Federal Law No. 28.12.2013 of 426-FZ "On Special Assessment of Working Conditions";
- 4.3.8. Decree of the Government of the Russian Federation of 27.11.2006 No. 719 "On Approval of the Regulation on Military Registration";
- 4.3.9. consent of the subject to the processing of his personal data;

4.3.10. processing necessary to exercise the rights and legitimate interests of the operator;

4.3.11. a contract requiring the processing of personal data by a party, beneficiary or surety under which the personal data subject is a party;

4.3.12. a contract for the conclusion of which, on the initiative of the personal data subject, processing of personal data is required, or a contract under which the personal data subject will be a beneficiary or guarantor;

4.3.13. the processing of personal data is necessary to protect the life, health or other vital interests of the personal data subject if obtaining the consent of the personal data subject is impossible;

4.3.14. Other normative legal acts of the Russian Federation and normative documents of authorized state authorities.

4.4. Processing and storage of personal data is carried out no longer than the purpose of processing personal data requires, unless otherwise provided by federal law or an agreement with the personal data subject establishes an appropriate storage period.

4.5. Personal data processed in the Company shall be destroyed upon the occurrence of the following conditions:

4.5.1. achieving the goals of personal data processing or maximum shelf life - to be destroyed within 30 days;

4.5.2. loss of the need to achieve the goals of personal data processing - within 30 days;

4.5.3. providing the personal data subject or his legal representative with confirmation that the personal data are illegally obtained or are not necessary for the stated purpose of processing - within 7 days;

4.5.4. impossibility to ensure the legality of personal data processing - within 10 days;

4.5.5. withdrawal by the personal data subject of consent to the processing of personal data, if the preservation of personal data is no longer required for the purposes of processing personal data - within 30 days;

4.5.6. personal data subject's request to stop processing personal data - within 10 days;

4.5.7. expiration of the limitation period for legal relations within which personal data are processed or carried out.

4.5.8. The destruction of personal data is carried out in accordance with the procedure specified in the Regulation on the Processing and Protection of Personal Data.

4.6. The Company processes personal data in the following ways and on the following legal grounds:

4.6.1. Search and selection for the purposes of employment of candidates for filling vacant positions, management of the efficiency of the recruitment process, including assessment of the level of satisfaction of applicants.

Categories of personal data processed:

- Others;
- Composition of processed personal data:
- Full name
 - Previous Last Name, First Name, Middle Name (if any)
 - Gender
 - Date of birth
 - Birthplace
 - Identity document details
 - Nationality
 - Data on education (data on the completion of the curriculum, information on the specialty and qualifications obtained)
 - Information on labor activity (including position, work experience, data on employment for the current time, indicating the name of the organization)
 - Marital status data
 - Attitude to military duty, information on military registration
 - Information on additional education (including advanced training, professional retraining)
 - Information on awards, honorary titles, incentives, penalties
 - Place of residence
 - Information about next of kin (including degree of kinship, data on place of work/study)
 - Taxpayer Identification Number (INN)
 - Information on the existence of registration as an individual entrepreneur, the presence of shares in the authorized capital of legal entities
 - Russian Federation
 - Phone number
 - E-mail address
 - Disability Information
 - Information on the presence of convictions

- Photographic materials
 - Information on availability of financial liabilities
 - Other personal data that the subject indicated in the resume
- Reasons for personal data processing:
- consent of the personal data subject to processing of his/her personal data in the Company;
- Personal data subjects:
- Applicants for vacancies;
 - Recommending applicants;
 - Family members and other relatives of applicants;
 - Applicants (participants of the personnel reserve);
- Processing type:
- Mixed, with and without automation.
- List of actions with personal data:
- collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;
- PD processing time:
- Until the processing goal is achieved;
 - Prior to withdrawal of consent to the processing of personal data.

4.6.2. Formation and Maintenance of the personnel register/reserve in order to select candidates for filling vacant positions of the Company.

- Categories of personal data processed:
- Others;
- Composition of processed personal data:
- Full name
 - Previous Last Name, First Name, Middle Name (if any)
 - Gender
 - Date of birth
 - Birthplace
 - Identity document details
 - Nationality
 - Data on education (data on the completion of the curriculum, information on the specialty and qualifications obtained)

- Information on labor activity (including position, work experience, data on employment for the current time, indicating the name of the organization)
 - Marital status data
 - Attitude to military duty, information on military registration
 - Information on additional education (including advanced training, professional retraining)
 - Information on awards, honorary titles, incentives, penalties
 - Place of residence
 - Taxpayer Identification Number (INN)
 - Phone number
 - E-mail address
 - Other personal data that the subject indicated in the resume
- Reasons for personal data processing:
- consent of the personal data subject to processing of his/her personal data in the Company;
- Personal data subjects:
- Applicants for vacancies;
 - Recommending applicants;
 - Family members and other relatives of applicants;
 - Applicants (participants of the personnel reserve);
- Processing type:
- Mixed, with and without automation.
- List of actions with personal data:
- collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;
- PD processing time:
- Until the processing goal is achieved;
 - Prior to withdrawal of consent to the processing of personal data.

4.6.3. Due diligence of applicants, including management of legal, reputational and compliance risks associated with applicants (prevention and settlement of conflicts of interest, anti-corruption), as well as verification of the completeness and reliability of information provided by applicants in order to identify circumstances that impede employment.

Categories of personal data processed:

- Others;
- Full name
- Previous Last Name, First Name, Middle Name (if any)
- Gender
- Date of birth
- Birthplace
- Identity document details
- Nationality
- Data on education (data on the completion of the curriculum, information on the specialty and qualifications obtained)
- Information on labor activity (including position, work experience, data on employment for the current time, indicating the name of the organization)
- Marital status data
- Attitude to military duty, information on military registration
- Information on additional education (including advanced training, professional retraining)
- Information on awards, honorary titles, incentives, penalties
- Information on social guarantees and benefits
- Registered address
- Place of residence
- Information about next of kin (including degree of kinship, data on place of work/study)
- Taxpayer Identification Number (INN)
- Insurance Number of Individual Ledger Account
- Information on the existence of registration as an individual entrepreneur, the presence of shares in the authorized capital of legal entities
- Phone number
- E-mail address
- Disability Information
- Information on the presence of convictions
- Photographic materials

- Information on availability of financial liabilities
- Other personal data that the subject indicated in the resume

Reasons for personal data processing: ● consent of the personal data subject to processing of his/her personal data in the Company;

Personal data subjects: ● Applicants for vacancies;
 ● Recommending applicants;
 ● Family members and other relatives of applicants.

Processing type: ● Mixed, with and without automation.

List of actions with personal data: ● collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;

PD processing time: ● Until the processing goal is achieved;
 ● Prior to withdrawal of consent to the processing of personal data.

4.6.4. Management of labor relations between the Company and its employees in accordance with the legislation of the Russian Federation, execution and application of electronic signatures, paper and electronic powers of attorney, organization of business trips and other business trips, including hotel reservations, registration of travel sheets.

Categories of personal data processed: ● Others;

Composition of processed personal data: ● Full name
 ● Previous Last Name, First Name, Middle Name (if any)
 ● Gender

- Date of birth
- Birthplace
- Identity document details
- Nationality
- Data on education (data on the completion of the curriculum, information on the specialty and qualifications obtained)
- Information on labor activity (including position, work experience, data on employment for the current time, indicating the name of the organization)
- Marital status data
- Attitude to military duty, information on military registration
- Bank account details
- Data on accrued remuneration and other payments provided for by law
- Information on additional education (including advanced training, professional retraining)
- Information on awards, honorary titles, incentives, penalties
- Vacation Details
- Information on social guarantees and benefits
- Registered address
- Place of residence
- Information on temporary disability
- Information about next of kin (including degree of kinship, data on place of work/study)
- Taxpayer Identification Number (INN)
- Insurance Number of Individual Ledger Account
- E-mail address
- Phone number
- Identity document data outside the Russian Federation
- Disability Information
- Information on the presence of convictions
- Photographic materials
- Driver's license data
- Results of medical examination.

- Reasons for personal data processing:
- consent of the personal data subject to processing of his/her personal data in the Company;
 - to achieve the goals stipulated by the legislation of the Russian Federation, for the Company to perform the functions, powers and duties assigned to it by the legislation of the Russian Federation, as well as the Company's charter;
- Personal data subjects:
- Employees of the Company;
 - Dismissed employees;
 - Relatives of employees;
- Processing type:
- Mixed, with and without automation.
- List of actions with personal data:
- collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;
- PD processing time:
- 75 years for personnel documents executed before 01.01.2003, 50 years for documents executed after 01.01.2003;
 - Prior to withdrawal of consent to the processing of personal data.

4.6.5. Personnel work planning and management of labor productivity, monitoring and control of the quantity and quality of work performed, as well as the rational use of working time, verification and assessment of the performance of official duties.

- Categories of personal data processed:
- Others;
- Composition of processed personal data:
- Full name
 - Date of birth
 - Data on education (data on the completion of the curriculum, information on the specialty and qualifications obtained)
 - Information about the position held (structural subdivision, position, date of appointment, date of dismissal)

- Information on labor activity (including position, work experience, data on employment for the current time, indicating the name of the organization)
- Data on accrued remuneration and other payments provided for by law
- Information on additional education (including advanced training, professional retraining)
- Information on awards, honorary titles, incentives, penalties
- Vacation Details
- Information on social guarantees and benefits
- Information on temporary disability
- Phone number
- E-mail address
- Disability Information.

Reasons for personal data processing: ● Consent of the personal data subject to the processing of his/her personal data in the Company.

Personal data subjects: ● Employees of the Company;
● Freelance personnel involved in the company's activities.

Processing type: ● Mixed, with and without automation.

List of actions with personal data: ● collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;

PD processing time: ● Until the processing goal is achieved;
● Prior to withdrawal of consent to the processing of personal data.

4.6.6. Consideration and resolution of labor disputes, conflict situations and other disagreements in the context of labor relations, control of compliance with the rules of discipline and security policies, ensuring the safety of the assets of the employer and other persons, effective external and internal monitoring of compliance with applicable regulations, bringing perpetrators to justice,

protecting rights and legitimate interests, including the use of all available remedies, participation in extrajudicial and judicial settlement of disputes, execution of judicial acts.

Categories of personal data processed:

- Others;
- Composition of processed personal data:
- Full name
 - Previous Last Name, First Name, Middle Name (if any)
 - Gender
 - Date of birth
 - Birthplace
 - Identity document details
 - Nationality
 - Data on education (data on the completion of the curriculum, information on the specialty and qualifications obtained)
 - Information about the position held (structural subdivision, position, date of appointment, date of dismissal)
 - Information on labor activity (including position, work experience, data on employment for the current time, indicating the name of the organization)
 - Data on accrued remuneration and other payments provided for by law
 - Information on additional education (including advanced training, professional retraining)
 - Information on awards, honorary titles, incentives, penalties
 - Vacation Details
 - Information on social guarantees and benefits
 - Registered address
 - Place of residence
 - Information on temporary disability
 - E-mail address
 - Phone number
 - Information on the existence of registration as an individual entrepreneur, the presence of shares in the authorized capital of legal entities

- Reasons for personal data processing:
 - consent of the personal data subject to processing of his/her personal data in the Company;
 - to achieve the goals stipulated by the legislation of the Russian Federation, for the Company to perform the functions, powers and duties assigned to it by the legislation of the Russian Federation, as well as the Company's charter;

- Personal data subjects:
 - Employees of the Company;
 - Dismissed employees;
 - Freelance personnel involved in the company's activities;

- Processing type:
 - Mixed, with and without automation.

- List of actions with personal data:
 - collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;

- PD processing time:
 - Until the processing goal is achieved;
 - Prior to withdrawal of consent to the processing of personal data.

4.6.7. Calculation and payment of wages, surcharges, bonuses, benefits, reimbursements for expenses incurred, compensations, material assistance, remuneration for official results of intellectual activity, the provision of benefits, intangible bonuses and privileges, other payments, as well as the provision of tax credits, including deduction of funds from wages and other income in cases provided by law.

- Categories of personal data processed:
 - Others;

- Composition of processed personal data:
 - Full name
 - Previous Last Name, First Name, Middle Name (if any)
 - Gender
 - Date of birth
 - Birthplace
 - Identity document details

- Information about the position held (structural subdivision, position, date of appointment, date of dismissal)
- Information on labor activity (including position, work experience, data on employment for the current time, indicating the name of the organization)
- Marital status data
- bank account details
- Data on accrued remuneration and other payments provided for by law
- Information on additional education (including advanced training, professional retraining)
- Information on awards, honorary titles, incentives, penalties
- Vacation Details
- Information on social guarantees and benefits
- Information on temporary disability
- Information about next of kin (including degree of kinship, data on place of work/study)
- Taxpayer Identification Number (INN)
- Phone number
- E-mail address

Reasons for personal data processing:

- consent of the personal data subject to processing of his/her personal data in the Company;
- to achieve the goals stipulated by the legislation of the Russian Federation, for the Company to perform the functions, powers and duties assigned to it by the legislation of the Russian Federation, as well as the Company's charter;

Personal data subjects:

- Employees of the Company;
- Freelance personnel involved in the company's activities;
- Beneficiaries/recipients of employee benefits.

Processing type:

- Mixed, with and without automation.

List of actions with personal data: ● collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;

PD processing time: ● Until the processing goal is achieved;
● Prior to withdrawal of consent to the processing of personal data.

4.6.8. Information support, facilitation and improvement of the efficiency of personnel working communications, including provision of business cards and creation of an internal directory of employees' contact details, planning, organization and conduct of working and entertainment events of various types, as well as in public and creative events.

Categories of personal data processed: ● Others;

Composition of processed personal data: ● Full name
● Gender
● Information about the position held (structural subdivision, position, date of appointment, date of dismissal)
● E-mail address
● Phone number

Reasons for personal data processing: ● consent of the personal data subject to processing of his/her personal data in the Company;

Personal data subjects: ● Employees of the Company;
● Freelance personnel involved in the company's activities;
● Relatives of employees;
● employees of the Group of Companies and its affiliates;
● Participants in company events;

Processing type: ● Mixed, with and without automation.

List of actions with personal data:

- collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;

PD processing time:

- Until the processing goal is achieved;
- Prior to withdrawal of consent to the processing of personal data.

4.6.9. Organization and conduct of trainings of various nature, advanced training, professional retraining, certification, testing of knowledge and abilities, conducting interviews of an official and other nature.

Categories of personal data processed:

- Others;

Composition of processed personal data:

- Full name
- Data on education (data on the completion of the curriculum, information on the specialty and qualifications obtained)
- Information about the position held (structural subdivision, position, date of appointment, date of dismissal)
- Information on labor activity (including position, work experience, data on employment for the current time, indicating the name of the organization)
- Information on additional education (including advanced training, professional retraining)
- E-mail address
- Phone number

Reasons for personal data processing:

- consent of the personal data subject to processing of his/her personal data in the Company;
- to execute a contract to which the personal data subject is a party, as well as to conclude a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor.

Personal data subjects: ● Employees of the Company;
● Freelance personnel involved in the company's activities;

Processing type: ● Mixed, with and without automation.

List of actions with personal data: ● collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;

PD processing time: ● Until the processing goal is achieved;
● Prior to withdrawal of consent to the processing of personal data.

4.6.10. Organization of medical examinations, examinations of professional suitability and medical examinations to determine the possibility of performing labor functions, as well as investigations, diagnostics and prevention of occupational diseases, accidents and industrial injuries.

Categories of personal data processed: ● Others;

Composition of processed personal data: ● Full name
● Gender
● Date of birth
● Birthplace
● Identity document details
● Information about the position held (structural subdivision, position, date of appointment, date of dismissal)
● Information on labor activity (including position, work experience, data on employment for the current time, indicating the name of the organization)
● Attitude to military duty, information on military registration
● Vacation Details
● Registered address
● Information on temporary disability

- Information about next of kin (including degree of kinship, data on place of work/study)
 - E-mail address
 - Phone number
 - Disability Information
 - Results of medical examination to determine professional suitability
- Reasons for personal data processing:
- consent of the personal data subject to processing of his/her personal data in the Company;
 - to achieve the goals stipulated by the legislation of the Russian Federation, for the Company to perform the functions, powers and duties assigned to it by the legislation of the Russian Federation, as well as the Company's charter;
- Personal data subjects:
- Employees of the Company;
 - Dismissed employees;
- Processing type:
- Mixed, with and without automation.
- List of actions with personal data:
- collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;
- PD processing time:
- Until the processing goal is achieved;
 - Prior to withdrawal of consent to the processing of personal data.

4.6.11. Providing employees with voluntary health insurance programs, including health and accident insurance and other types of insurance.

- Categories of personal data processed:
- Others;

Composition of processed personal data:	<ul style="list-style-type: none"> ● Full name ● Gender ● Date of birth ● Birthplace ● Identity document details ● Information about the position held (structural subdivision, position, date of appointment, date of dismissal) ● Information on labor activity (including position, work experience, data on employment for the current time, indicating the name of the organization) ● Marital status data ● E-mail address ● Phone number
Reasons for personal data processing:	<ul style="list-style-type: none"> ● consent of the personal data subject to processing of his/her personal data in the Company; ● to execute a contract to which the personal data subject is a party, as well as to conclude a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor.
Personal data subjects:	<ul style="list-style-type: none"> ● Employees of the Company; ● Relatives of employees;
Processing type:	<ul style="list-style-type: none"> ● Mixed, with and without automation.
List of actions with personal data:	<ul style="list-style-type: none"> ● collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;
PD processing time:	<ul style="list-style-type: none"> ● Until the processing goal is achieved; ● Prior to withdrawal of consent to the processing of personal data.

4.6.12. Provision of internal and access control at the used real estate objects.

- Categories of personal data processed:
 - Others;
- Composition of processed personal data:
 - Full name
 - Identity document details
 - Information about the position held (structural subdivision, position, date of appointment, date of dismissal)
 - Vehicle number and model.
- Reasons for personal data processing:
 - the processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator or third parties.
- Personal data subjects:
 - Employees of the Company;
 - Freelance personnel involved in the company's activities;
 - Visitors to the company's facilities;
- Processing type:
 - Mixed, with and without automation.
- List of actions with personal data:
 - collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;
- PD processing time:
 - Until the processing goal is achieved;
 - Prior to withdrawal of consent to the processing of personal data.

4.6.13. Conducting contractual work, including the conclusion, execution, amendment and termination of contracts and agreements with counterparties, settlement, accounting and tax accounting, organization and maintenance of office work, ensuring internal and external document management, maintaining legally significant correspondence, compliance with the requirements of the legislation of the Russian Federation.

- Categories of personal data processed:
- Others;
- Composition of processed personal data:
- Full name
 - Date of birth
 - Identity document details
 - Information about the position held (structural subdivision, position, date of appointment, date of dismissal)
 - Taxpayer Identification Number (INN)
 - Phone number
 - E-mail address
 - Information on the existence of registration as an individual entrepreneur, the presence of shares in the authorized capital of legal entities
- Reasons for personal data processing:
- consent of the personal data subject to processing of his/her personal data in the Company;
 - to achieve the goals stipulated by the legislation of the Russian Federation, for the Company to perform the functions, powers and duties assigned to it by the legislation of the Russian Federation, as well as the Company's charter;
 - to execute a contract to which the personal data subject is a party, as well as to conclude a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor.
- Personal data subjects:
- Employees of the Company;
 - Freelance personnel involved in the company's activities;
 - employees of the Group of Companies and its affiliates;
 - Representatives of counterparties;
 - Counterparties (physical persons);
- Processing type:
- Mixed, with and without automation.

List of actions with personal data: ● collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;

PD processing time: ● Until the processing goal is achieved;
● Prior to withdrawal of consent to the processing of personal data.

4.6.14. Information interaction with all stakeholders, including sending information messages, processing incoming messages, providing support in case of problems, analyzing and analyzing medical complaints, as well as assessing customer satisfaction with the company's services and services.

Categories of personal data processed: ● Others;

Composition of processed personal data: ● Full name
● Phone number
● E-mail address
● Personal data specified by subjects in circulation
● Alternative contact details for communication (instant messengers, social networks)

Reasons for personal data processing: ● the consent of the personal data subject to the processing of his personal data in the Company.

Personal data subjects: ● Representatives of counterparties;
● Counterparties (physical persons);
● Members of marketing/loyalty programs;
● Persons who left feedback;
● Patients;
● Patient representatives.

Processing type: ● Mixed, with and without automation.

List of actions with personal data: ● collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;

PD processing time: ● Until the processing goal is achieved;
● Prior to withdrawal of consent to the processing of personal data.

4.6.15. Ensuring the correct operation of the company's website and mobile application, personalizing the user experience by providing products, functions, features and offers adapted to user needs, preferences and interests, ensuring a positive user experience.

Categories of personal data processed: ● Others;

Composition of processed personal data: ● Technical cookies (IP address, mac address...)
● Functional cookies (device model, screen resolution, device type...)
● Statistical cookies (behavior patterns, traffic sources...)
● Marketing cookies (web analytics data...).

Reasons for personal data processing: ● consent of the personal data subject to processing of his/her personal data in the Company;

Personal data subjects: ● Users of sites and mobile applications.

Processing type: ● Using automation tools.

List of actions with personal data: ● collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;

PD processing time: ● Until the processing goal is achieved;

- Prior to withdrawal of consent to the processing of personal data.

4.6.16. Promotion of own products and brand in the market through marketing communications, organization of marketing events and promotions, including inviting persons to participate in such events, interaction and fulfillment of the company's obligations to issue prizes to winners, as well as the exercise of rights and fulfillment of obligations in accordance with the requirements of the legislation, conducting marketing, statistical surveys and research, including determining the effectiveness of marketing companies.

Categories of personal data processed:

- Others;

Composition of processed personal data:

- Full name
- Gender
- Date of birth
- Phone number
- E-mail address
- Technical cookies (IP address, mac address...)
- Functional cookies (device model, screen resolution, device type...)
- Statistical cookies (behavior patterns, traffic sources...)
- Marketing cookies (web analytics data...).
- Statistics on company preferences and services used.
- Alternative contact details for communication (instant messengers, social networks)

Reasons for personal data processing:

- the consent of the personal data subject to the processing of his personal data in the Company.

Personal data subjects:

- Members of marketing/loyalty programs;
- Participants in company events;
- Patients.

Processing type:

- Mixed, with and without automation.

List of actions with personal data:

- collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;

PD processing time:

- Until the processing goal is achieved;
- Prior to withdrawal of consent to the processing of personal data.

4.6.17. Implementation of client service healthcare activities, including the establishment of a medical diagnosis, provision of medical and medical-social services, medical examination and treatment in various areas, including hospitalization and inpatient care, accounting and systematization of services provided, in order to fulfill the terms of contracts, improve, control the quality and safety of the provision of services, including compliance with the requirements of the Operator of the current legislation of the Russian Federation on the procedure for organizing a document management system in the field of health protection in terms of maintaining medical records in the field of electronic documents, which includes the formation, writing and storage of medical documents, their registration in the unified state information system in the field of healthcare (EGISZ - Unified State Health Information System) and other requirements of the legislation of the Russian Federation. Coordination of services for patients of insurance companies and specialized funds, processing of letters of guarantee for the provision of medical care, coordination of processes for resolving issues related to patients of insurance companies and specialized funds, interaction for the purpose of providing medical care and fulfilling the requirements of the legislation of the Russian Federation.

Categories of personal data processed:

- Others;
- Special.

Composition of processed personal data:

- Full name
- Gender
- Date of birth
- Birthplace
- Identity document details
- Data on education (data on the completion of the curriculum, information on the specialty and qualifications obtained)

- Information about the position held (structural subdivision, position, date of appointment, date of dismissal)
- Marital status data
- Bank account details
- Information on awards, honorary titles, incentives, penalties
- Place of residence
- Information on temporary disability
- Information about next of kin (including degree of kinship, data on place of work/study)
- Insurance number of the individual ledger account
- Compulsory medical insurance policy data
- Voluntary health insurance policy data
- Phone number
- E-mail address
- Alternative contact details for communication (instant messengers, social networks)
- Disability Information
- Health data
- Diagnosis
- Cases of seeking medical attention
- Data contained in the doctor's examination protocol and other data obtained during examination and treatment.

Reasons for personal data processing:

- consent of the personal data subject to processing of his/her personal data in the Company;
- to achieve the goals stipulated by the legislation of the Russian Federation, for the Company to perform the functions, powers and duties assigned to it by the legislation of the Russian Federation, as well as the Company's charter;
- to execute a contract to which the personal data subject is a party, as well as to conclude a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor;
- the processing of personal data is necessary to protect the life, health or other vital interests of the personal data subject if obtaining the consent of the personal data subject is impossible.

- Personal data subjects: ● Patients;
● Patient representatives;
- Processing type: ● Mixed, with and without automation.
- List of actions with personal data: ● collection, recording, systematization, accumulation, refinement (update, change), extraction, use, transfer (provision, access), storage, blocking, deletion, destruction;
- PD processing time: ● Until the processing goal is achieved;
● Prior to withdrawal of consent to the processing of personal data.

4.7. The Company processes special categories of personal data.

4.8. The Company does not process biometric personal data.

5. Terms of personal data processing

5.1. The condition for the termination of personal data processing may be the achievement of the goals of personal data processing, the expiration of the consent or withdrawal of the consent of the personal data subject to the processing of his personal data, as well as the phenomenon of illegal processing of personal data.

5.2. When a personal data subject withdraws consent to the processing of his personal data, The Company has the right to continue processing personal data without the consent of the personal data subject, if such processing is provided for by a contract to which the personal data subject is a party, beneficiary or surety, other agreement between the Company and the personal data subject, or if the Company is entitled to process personal data without the consent of the personal data subject on the grounds provided for by Law No. 152-FZ (federal law) or other federal laws.

6. Procedure and conditions of personal data processing

6.1. Processing of personal data of the personal data subject is carried out with his consent to the processing of personal data, and without, if Personal Data Processing is necessary for the performance of the contract, whose party or beneficiary or surety is the subject of personal data, as well as to conclude a contract on the initiative of the personal data subject or contract, according to which the personal data subject will be a beneficiary or guarantor or, in the case of when the processing of personal data is necessary for the exercise of the rights and legitimate interests of the personal data operator or in other cases, provided for by the legislation in the field of processing and ensuring the security of personal data.

6.2. In accordance with Law No. 152-FZ (federal law), the Company may process personal data on the instructions of other operators with the consent of personal data subjects.

6.3. The company, in accordance with Law No. 152-FZ (federal law), has the right to entrust the processing of personal data to a third party with the consent of the personal data subject. Such processing of personal data is carried out only on the basis of an agreement concluded between the Company and a third party, in which the following should be determined:

6.3.1. list of actions (operations) with personal data to be performed by a third party processing personal data;

6.3.2. list of personal data;

6.3.3. requirements stipulated by Part 5 of Article 18 and Article 18.1 of Law No. 152-FZ (federal law);

6.3.4. the obligation, at the request of the operator of personal data, during the validity period of the operator's order, including before the processing of personal data, to

provide documents and other information confirming the adoption of measures and compliance with the requirements established in accordance with Article 18.1 of Law No. 152-FZ (federal law) in order to fulfill the operator's order;

6.3.5. the obligation to ensure the security of personal data during their processing;

6.3.6. requirements for the protection of processed personal data in accordance with Article 19 of Law No. 152-FZ (federal law);

6.3.7. the requirement to notify the operator of cases provided for in Part 3.1 of Article 21 of Law No. 152-FZ (federal law);

6.3.8. purposes of personal data processing;

6.3.9. obligations of a third party to observe confidentiality of personal data and ensure their security during processing, as well as requirements for protection of processed personal data.

6.4. The Company shall be liable to the personal data subject for the actions of persons to whom the Company entrusts the processing of personal data of the personal data subject.

6.5. The Company transfers personal data to government agencies within their powers in accordance with the legislation of the Russian Federation.

6.6. Access to processed personal data is granted only to those employees of the Company who need it in connection with the performance of their official duties and in compliance with the principles of personal responsibility.

6.7. In case of confirmation of the fact of inaccuracy of personal data or inaccuracy of their processing, personal data shall be updated by the Company, and processing shall be terminated accordingly.

6.8. Upon achieving the goals of personal data processing, as well as in case of revocation by the personal data subject of consent to their processing, personal data shall be destroyed if:

6.8.1. otherwise provided by the contract to which the personal data subject is a party, beneficiary or surety;

6.8.2. the operator is not entitled to process personal data without the consent of the subject on the grounds provided for by Law No. 152-FZ (federal law) or other federal laws;

6.8.3. otherwise is not provided for by any other agreement between the operator and the personal data subject.

6.9. When storing personal data, the Company uses databases located in the Russian Federation in accordance with Part 5 of Art. 18 of Law No. 152-FZ (federal law).

6.10. The Company shall inform the personal data subject or his/her representative about the processing of personal data of such subject at the request of the latter.

6.11. The Company has developed and approved by the General Director of the Company Regulations for Handling Appeals of Personal Data Subjects or Their Representatives and Requests of the Authorized Body for Protection of Rights of Personal Data Subjects in the Company.

7. Cross-border transfer of personal data

7.1. The Company may carry out cross-border transfer of personal data only with the consent of the personal data subject and after compliance with all legal requirements for such transfer.

7.2. The Company carries out cross-border transfer only to those foreign states that are included in the list of foreign states that ensure adequate protection of the rights of personal data subjects. The list includes states that are parties to the Council of Europe Convention on the Protection of Individuals with Automated Processing of Personal Data, as well as foreign states that are not parties to the Council of Europe Convention on the Protection of Individuals with Automated Processing of Personal Data, subject to compliance with the provisions of the Convention in force in the State concerned and the measures taken to ensure the confidentiality and security of personal data when they are processed and subject to the permission of the regulatory authority.

7.3. The Company shall ensure that the rights of personal data subjects are adequately protected by the foreign state to whose territory the personal data are intended to be transferred prior to such transfer.

7.4. The Company shall notify the authorized body for the protection of the rights of personal data subjects of its intention to carry out the cross-border transfer of personal data prior to the start of the cross-border transfer of personal data.

7.5. The Company prior to giving the notice provided for in Clause 8.4. Politicians are obliged to obtain the following information from the authorities of a foreign state, foreign individuals, foreign legal entities to which cross-border transfer of personal data is planned:

7.5.1. information on the measures taken to protect the personal data transferred and on the conditions for termination of their processing;

7.5.2. information on the legal regulation in the field of personal data of a foreign state under the jurisdiction of which the authorities of a foreign state, foreign individuals, foreign legal entities to which cross-border transfer of personal data is planned (if it is planned to carry out cross-border transfer of personal data to authorities of a foreign state, foreign individuals, foreign legal entities under the jurisdiction of a foreign state that is not a party to the Council of Europe Convention on the Protection of Individuals with Automated Processing of Personal Data and is not included in the list of foreign states that ensure adequate protection of the rights of personal data subjects);

7.5.3. information about the authorities of a foreign state, foreign individuals, foreign legal entities to which cross-border transfer of personal data is planned (name or surname, first name and patronymic, as well as contact phone numbers, postal addresses and email addresses).

7.6. In order to assess the reliability of the information contained in the Company's notice of its intention to carry out cross-border transfer of personal data, the information is provided by the Company at the request of the authorized body for the protection of the rights of personal data subjects within ten working days from the date of receipt of such a request. The specified period may be extended, but not more than five business days if the Company sends a reasoned notification to the authorized body for the protection of the rights of personal data subjects indicating the reasons for the extension of the period for providing the requested information.

7.7. Cross-border transfer of personal data may be prohibited or restricted in order to protect the foundations of the constitutional order of the Russian Federation, morality, health, rights and legitimate interests of citizens, ensuring the country's defense and state security, protecting the economic and financial interests of the Russian Federation, providing diplomatic and international legal means of protecting rights, freedoms and interests of citizens of the Russian Federation, sovereignty, security, territorial integrity of the Russian Federation and its other interests in the international arena from the date of the decision by the authorized body for the protection of the rights of personal data subjects to prohibit or restrict cross-border transmission.

7.8. After sending a notice of intention to carry out cross-border transfer of personal data, the Company shall be entitled to carry out cross-border transfer of personal data on the territory of the foreign states specified in such notice, included in the list of states that ensure adequate protection of the rights of personal data subjects, until a decision is made to prohibit or restrict cross-border transfer.

7.9. After sending a notice of intention to carry out cross-border transfer of personal data, the Company shall not be entitled to carry out cross-border transfer of personal data on the territory of foreign states specified in the notice until the expiration of the terms of consideration of the notice of intention to carry out cross-border transfer of personal data, not included in the list of states that ensure adequate protection of the rights of personal data subjects, except in the case of where such cross-border transfer of personal data is necessary to protect life, health, other vital interests of the personal data subject or other persons.

7.10. If the authorized body for the protection of the rights of personal data subjects makes a decision to prohibit or restrict the cross-border transfer of personal data, the Company is obliged to ensure the destruction by the authority of a foreign state, a foreign individual, a foreign legal entity of personal data previously transferred to it.

8. Rights and obligations of the company and personal data subjects

8.1. The personal data subject in accordance with Law No. 152-FZ (federal law) has the right:

8.1.1. freely, by their will and in their interest to provide their personal data and consent to their processing;

8.1.2. send appeals to the Company, including repeated ones, and receive information on the processing of personal data belonging to the personal data subject in the manner, form, scope and within the time frame established by the legislation of the Russian Federation;

8.1.3. require the Company to clarify its personal data, block them or destroy them in case if the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, as well as take measures provided for by the legislation of the Russian Federation to protect their rights and legitimate interests, including the right to compensation for losses and (or) compensation for moral damage in court;

8.1.4. request the Company to terminate the processing of its personal data, as well as to withdraw the consent to the processing of personal data;

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

8.2. In accordance with the requirements of Law No. 152-FZ (federal law), the company is obliged to:

8.2.1. provide the personal data subject, upon his request, with information regarding the processing of his personal data, or legally refuse;

8.2.2. at the request of the subject of personal data, clarify the processed personal data, block or delete if the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing;

8.2.3. keep records of requests of personal data subjects;

8.2.4. not disclose or distribute personal data without the consent of the personal data subject, unless otherwise provided by the legislation of the Russian Federation;

8.2.5. if personal data are not received from the personal data subject before the start of personal data processing, provide the personal data subject with the information provided for by Law No. 152-FZ (federal law), taking into account the exceptions established by the legislation of the Russian Federation;

8.2.6. explain to the personal data subject the legal consequences of refusal to provide personal data and (or) give consent to the processing of personal data, if the provision of

personal data and (or) obtaining consent to the processing of personal data is mandatory in accordance with the legislation of the Russian Federation;

8.2.7. stop processing and destroy personal data in the following cases:

8.2.8. achieving the goals (objectives) of personal data processing or in case of loss of the need to achieve the goals (objectives) of personal data processing, unless otherwise established by Law No. 152-FZ (federal law) or other applicable regulatory legal acts of the Russian Federation;

8.2.9. revocation by the personal data subject of his consent to the processing of personal data;

8.2.10. submission by the personal data subject of a request to terminate the processing of personal data, unless otherwise established by Law No. 152-FZ (federal law);

8.2.11. identification of illegal processing of personal data by the Company (if it is impossible to ensure the legality of processing).

8.2.12. take the necessary legal, organizational and technical measures to protect personal data from illegal or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data;

8.2.13. notify Roskomnadzor (the Federal Executive Body of Russia that supervises communications, information technology and mass media) in case of establishing the fact of illegal or accidental transfer (provision, distribution, access) of personal data that entailed a violation of the rights of personal data subjects, in the manner and within the time frame established by the legislation on personal data;

8.2.14. interact with the state system for detecting, preventing and eliminating the consequences of computer attacks on information resources of the Russian Federation (GosSOPKA) in the manner determined by the federal executive body authorized in the field of security;

8.2.15. report to Roskomnadzor (the Federal Executive Body of Russia that supervises communications, information technology and mass media), at the request of this body, the necessary information;

8.2.16. perform other duties stipulated by the legislation of the Russian Federation.

8.3. The Company, in accordance with the requirements of Law No. 152-FZ (federal law), has the right to:

8.3.1. defend their interests in court;

8.3.2. process personal data of personal data subjects in the absence of consent to the processing of personal data in cases provided for by Law No. 152-FZ (federal law);

8.3.3. transfer personal data of personal data subjects to third parties 8.3.3. persons, state bodies, municipal authorities, state institutions, state extra-budgetary funds, other

persons (if applicable), if it is provided for by the current legislation (tax, law enforcement agencies, etc.) or the subject's consent to such transfer;

8.3.4. entrust the processing of personal data of personal data subjects to third parties if there are relevant legal grounds and compliance with the requirements of Law No. 152-FZ (federal law);

8.3.5. refuse the personal data subject to provide information on the processing of his personal data in cases provided for by Law No. 152-FZ (federal law);

8.3.6. independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by Law No. 152-FZ (federal law) and regulatory legal acts adopted in accordance with it, unless otherwise provided by the legislation of the Russian Federation;

8.3.7. independently, taking into account the requirements of Law No. 152-FZ (federal law), determine the list of necessary legal, organizational and technical measures to protect personal data from illegal or accidental access to them, destruction, modification, blocking, copying, provision of personal data, as well as from other illegal actions in relation to personal data based on the assessment of current threats to the security of personal data, as well as determine the procedure for the implementation of these measures and assess the effectiveness of the measures taken;

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

9. Privacy of personal data

10.1. Access to personal data is limited in accordance with the legislation of the Russian Federation.

10.2. Access to processed personal data is granted only to those employees of the Company who need it in connection with the performance of their official duties and a certain order of the General Director or his authorized representative.

10.3. Employees of the Company who have gained access to personal data undertake obligations to ensure confidentiality and security of the processed personal data.

10.4. The Company does not disclose or distribute personal data to third parties without the consent of the personal data subject, unless otherwise provided by the legislation of the Russian Federation.

10.5. Third parties who have access to personal data or process personal data on behalf of the Company undertake to comply with the requirements of contracts and agreements with the Company in terms of ensuring confidentiality and security of personal data.

10. Personal data security

11.1. The Company appoints persons responsible for the organization of processing and ensuring the security of personal data as appropriate administrative documents.

11.2. The security of the Company's personal data in accordance with the Regulations on the Processing and Protection of Personal Data of Personal Data Subjects in the Company is ensured by means of a personal data protection system, including organizational and technical measures.

11.3. In order to ensure the security of personal data, the Company takes the following measures:

11.3.1. systematic assessment of personal data security threats during their processing in personal data information systems;

11.3.2. assessment of harm and (or) damage to personal data subjects in case of violation of personal data legislation;

11.3.3. determination of the required level of protection of personal data processed in the Company's information systems in accordance with Decree of the Government of the Russian Federation of 01.11.2012 No. 1119 "On approval of requirements for the protection of personal data when they are processed in personal data information systems";

11.3.4. delimitation of access to personal data information systems, physical media (documents), removable (machine) media of personal data;

11.3.5. registration and recording of actions of users and administrators of information systems with personal data, software of information systems, removable (machine) media and information protection means;

11.3.6. preventing the introduction of malware into the Company's information systems;

11.3.7. use of secure communication channels;

11.3.8. backup and restoration of functional capability of hardware and software, databases and information systems protection tools;

11.3.9. excluding the possibility of uncontrolled access to the Company's offices, as well as to the premises where technical means are located that allow processing personal data, as well as storing personal data carriers;

11.3.10. identification of incidents related to violation of requirements for processing and ensuring the security of personal data, and response to them;

11.3.11. increasing the level of knowledge of the Company's employees in the field of personal data processing and security;

- 11.3.12. internal and external inspections (audits) of compliance of personal data with the requirements of the Policy, internal (local) documents (acts) of the Company, requirements of the legislation on personal data;
- 11.3.13. assessment of the effectiveness of measures taken to ensure the security of personal data and improvement of the personal data protection system.

11. Final provisions

12.1. The Policy is publicly available and must be posted on the Company's official website <https://medsi.ru/>.

12.2. The Policy shall be reviewed at least 1 (once) a year, as well as:

12.2.1. in case of changes in the legislation of the Russian Federation in the field of personal data processing;

12.2.2. in cases of receiving orders to eliminate non-conformities affecting the scope of the Policy;

12.2.3. by decision of the General Director of the Company;

12.2.4. when it becomes necessary to change the purposes, principles and conditions of personal data processing in the Company.

12.3. Compliance with the requirements of the Policy shall be monitored by persons responsible for the organization of processing and security of personal data in the Company.

12.4. For non-compliance with the requirements of the Policy, all employees of the Company who have access to personal data are liable in accordance with the legislation of the Russian Federation.

12.5. Persons guilty of violating the requirements of the legislation in the field of personal data bear the responsibility provided for by the legislation of the Russian Federation.

12.6. Personal data subjects whose personal data are processed by the Company may receive clarifications on the processing of their personal data, as well as exercise their rights and legitimate interests by sending a corresponding written appeal to the legal address: 123056, Moscow, Gruzinsky per., 3a or in electronic form to the address posted on the website <https://medsi.ru/>.

12.7. An appeal from a personal data subject or his/her representative shall contain information allowing to identify the personal data subject and his/her representative (if any), as well as information allowing to establish the nature of relations with the Company, in particular:

12.7.1. surname, first name, patronymic of the personal data subject or his representative;

12.7.2. series, number of the document certifying the identity of the personal data subject or his representative, information on the date of issue of the specified document and the issuing authority;

12.7.3. signature of the personal data subject or his/her representative;

12.7.4. if the appeal is sent by a representative of the personal data subject, it must contain a copy of the document confirming the powers of such a representative.