Annex 1
to Order of the Director General of JSC VTB Medicine
dated dd. 26/02/2026 № OD-9-1

POLICY
for personal data processing of JSC VTB Medicine

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GLOSSARY

Automated personal data processing	–	personal data processing with computer equipment.
Biometric personal data	–	data characterizing physiological and biological peculiarities of a person which allow to identity the personal data subject.
Personal data blocking	–	temporary termination of personal data processing (excluding cases when processing is required for personal data clarification).
Access to personal data	–	possibility of obtaining personal data and their use (in particular copying, modification or destruction of personal data; obtaining possibility of acquaintance with personal data including by means of technical means by the subject).
Personal data protection	–	security measures aimed at preventing accidental or unauthorized destruction or accidental loss of personal data as well as to prevent unauthorized access to personal data, their modification or dissemination.
Information system of personal data	–	aggregate of personal data contained in databases and information technologies and technical facilities ensuring its processing.
Information	–	facts (messages, data) regardless of its presentation format.
Personal data confidentiality	–	requirement not to disclose, provide access to third parties or allow dissemination of personal data without the consent of the subject of personal data or other grounds under the laws of the Russian Federation.
IR	–	internal regulations.
Tangible medium of personal data	–	material object used for fixing and storing information (paper document, floppy disk, flash card, external hard disks, CDs, DVDs, etc.).
Machine-readable medium	–	tangible medium intended for recording, storing and reproducing information using computer facilities.
Non-automated personal data processing	–	actions with personal data performed in relation to the personal data subject with direct participation of the person.
Personal data depersonalization	–	actions resulting in impossibility to determine particular personal data subject without additional information.
Personal data processing	–	any action (operation) or cumulative actions (operations) taken using automation means or not using these means with personal data including collection, recording, systematization, accumulation, storage, clarification (updating, changing), retrieval, use, distribution, transmission (distribution, provision, access), depersonalization, locking, removal and destruction of the personal data.
Publicly accessible sources of personal data	–	personal data access to which is provided to an unlimited number of people with consent of the personal data subject as well as personal data to which the requirement of

		confidentiality compliance is not applied in accordance with the Russian Federation legislation.
Organization	–	Joint Stock Company VTB Medicine (JSC VTB Medicine). The organization is the Operator.
Operator	–	legal body independently or jointly with other persons organizing and (or) processing personal data as well as determining purposes of processing personal data, composition of personal data to be processed, actions (operations) performed with personal data.
Organization's partner	–	medical, insurance, and other organizations interacting with JSC VTB Medicine to promote the export of medical services.
Personal data	–	any information related directly or indirectly to an identified or identifiable natural person (personal data subject).
Personal data allowed by the personal data subject for dissemination	–	personal data access to which is provided by the personal data subject to an unlimited number of persons by providing consent to the processing of personal data authorized by the personal data subject for dissemination according to the procedure specified in the Russian Federation legislation.
Personal data provision	–	activities focused on disclosure of personal data to the definite range of persons.
User	–	visitor of the Organization's website.
Employee	–	natural person who has entered into employment relations with the Organization.
Employer	–	Organization which has entered into employment relations with the employee.
Personal data disclosure	–	actions that lead to familiarization with personal data processed in the Organization.
Personal data distribution	–	actions aimed at disclosure of personal data to an indefinite number of persons including in mass media, information and telecommunication networks or providing access to personal data in any other way.
Relatives	–	persons excluding near relatives who are related.
Roskomnadzor	–	Federal Service for Supervision of Communications, Information Technology and Mass Media that is the competent authority for protection of personal data subject rights.
Website	–	page(s) in information and telecommunications network Internet, rights to which are owned by the Organization: v https://www.vtb.med and subdomains.
Data on Website visitors	–	list of user data collected using Internet services of Website traffic evaluation / metrics collection.
Mixed personal data processing	–	personal data processing including both automated and non-automated processing of personal data.

Special categories of personal data	–	data concerning race, ethnic origin, political opinions, religious or philosophical beliefs, health condition, intimacies, records of conviction of the personal data subject.
Personal data subject	–	individual person who is directly or indirectly identified or identifiable using personal data.
Cross-border transfer of personal data	–	personal data transfer to a foreign state, an authorities of a foreign state, a foreign individual or a foreign legal entity.
Personal data destruction	–	actions resulting in impossibility to recover content of personal data in the information system of personal data and (or) as the result of which material carriers of personal data are destructed.
Cookie file	–	text files stored on the User's device when visiting the Site including the IP address, information about the browser and type of operating system of the User's device, technical characteristics of equipment and software used by the User, date and time of use of the Website and other actions performed on the Website.
Federal law No. 152-FZ	–	Federal law dd. 27/07/2006 No. 152-FZ "On Personal Data".
Personal data processing purpose	–	specific final result of actions performed with personal data arising from requirements of the legislation and aimed also at creating the necessary legal conditions to achieve optimal harmonization of interests of the parties.
Family members and near relatives	–	husband/wife, children (including adopted children), parents (including adoptive parents), grandparents, grandchildren, brothers and sisters (both full-blooded and half-blooded – having a common father or mother).

1. General provisions

1.1. The personal data processing policy of JSC VTB Medicine (hereinafter referred to as the Organization, Policy, PD correspondingly) has been developed to meet requirements of it. 2, part 1, art. 18.1 of the Federal law No. 152-FZ to ensure protection of PD subject rights and freedoms upon processing of his/her PD including protection of rights to personal and family privacy.

1.2. The Policy determines main principles, objectives, legal grounds for PD processing, lists and categories of processed PD as well as requirements to PD protection implemented by the Organization.

1.3. The Policy is applied to entire PD processed in the Organization.

The Policy is not applied to relations appearing in the process of organization of storage, acquisition, accounting in accordance with the Russian Federation legislation on archiving.

1.4. The Policy is the basis for arrangement of works for PD processing and protection in the Organization including for development of the Organization IRs regulating particular issues of PD processing and protection in the Organization.

1.5. The Policy is mandatory for execution by all Organization's employees.

1.6. The Policy is the publicly available document located on the Website at https://www.vtb.med unrestricted access to which is granted to any interested person.

1.7. The Policy and its amendments are approved by the Director General of the Organization or other authorized person.

2. Personal data processing principles

2.1. When organizing PD processing the Organization is guided by the following principles:

– PD processing is performed on the legal and equitable basis in the Organization;

– PD processing is limited to achievement of specified, predetermined and legitimate purposes;

– PD processing incompatible with PD collection purposes is not allowed;

– it is not allowed to unify the databases of PD which processing is performed for incompatible purposes;

– PD shall be processed only if they meet the purposes of their processing;

– content and extent of processed PD meets the stated processing purposes. Redundancy of processed PD relation to the stated objectives of their processing is not allowed;

– during PD processing their accuracy and sufficiency is ensured as well as their relevance where necessary, having regard to the purposes for which they are processed. The Organization takes required measures or ensures their taking for removal or clarification of incomplete or inaccurate PD;

– PD storage is performed in a form which permits identification of PD subjects for no longer than is necessary for the purposes for which the personal data are processed, if the PD storage period is not established by a federal law, contract to which party, beneficiary or guarantee is the PD subject;

– processed PD are destructed or impersonalized upon achievement of processing purposes or if there is no further need in achievement of these purposes unless otherwise specified by federal laws.

2.2. When processing PD the Organization assumes that the PD subject provides exact and reliable information, informs Organization representatives on change of his/her PD during interaction with the Organization.

3. Purposes of collection, methods, terms of processing (storage) and destruction of personal data

3.1. For each PD processing purpose the Organization's internal regulations specify categories of PD subjects, PD categories processed in the Organization, legal basis for PD processing, list of actions with PD, PD processing methods as well as terms of their processing and storage, PD destruction procedure upon achievement of their processing purposes or upon occurrence of other legal grounds are established.

3.2. PD are processed by the Organization for the following purposes:

3.2.1. keeping personnel and accounting records;

3.2.2. implementation of activities in the sphere of medical services export promotion;

3.2.3. getting feedback from the Organization by the User for further advice and information about Organization's services.

3.3. For each purpose of PD processing the following methods of their processing are envisaged: automated processing (using computer equipment), non-automated processing (not using computer equipment) with PD fixation on tangible media and mixed processing (processing of PD including both automated and unautomated processing of PD).

PD processing by the Organization using automated means (in information systems of personal data) (hereinafter referred to as ISPD) and non-automated means is performed according to the requirements of the Russian Federation legislation and the Organization IR regulating issues of PD processing and protection.

When processes PD by automated means the Organization takes the necessary measures to ensure security of processed PD. PD processing by non-automated means including tangible medium storage is performed in premises ensuring their preservation with capability of determination of storage locations of PD medium according to the procedure envisaged by the Russian Federation legislation.

3.4. PD processing and storage terms for each PD processing purpose specified in an annex to the Policy are established considering compliance with the requirements including PD processing conditions determined by the Russian Federation legislation, and/or considering provisions of a contract, a party, beneficiary or guarantee to which is the PD subject, and/or consent of the PD subject for processing of his/her PD, upon that PD processing and storage are carried out no longer than it is required by PD processing purposes unless otherwise established by the Russian Federation legislation.

3.5. PD which processing is performed within purposes specified in the annex to the Policy is destructed in the following cases:

– upon achievement of a purpose (purposes) of PD processing or in case of the loss of need to achieve the purpose (purposes) of PD processing unless otherwise established by regulatory legal acts of the Russian Federation;

– upon detection of illegal PD processing;

– upon PD subject's withdrawal of consent for PD processing unless otherwise envisaged by the Russian Federation legislation;

– when the PD subject requires to stop PD processing unless otherwise established by the Russian Federation legislation.

PD destruction methods are determined by other Organization IR depending on PD processing methods and PD tangible media on which PD recording and storage are performed.

4. List of subjects which personal data are processed in the Organization

4.1. The Organization processes the PD of the following categories of subjects:

4.1.1. Organization employees including those dismissed;

4.1.2. applicants for vacant positions of the Organization;

4.1.3. family members and near relatives / relatives of PD subjects specified in it. 4.1.1, 4.1.2, 4.1.7 of the Policy;

4.1.4. individuals who are counterparts / beneficiary parties under contracts concluded with the Organization;

4.1.5. individuals sending appeals to the Organization;

4.1.6. Users;

4.1.7. individuals applying for health care to the Organization partners;

4.1.8. representatives of the specified groups of PD subjects.

5. List of personal data processed in the Organization

5.1. The Organization processes PD that are limited to what is necessary in relation to the specified in section 3 of the Policy purposes for which they are processed.

5.2. Processing of special PD categories concerning race, ethnic origin, political opinions, religious or philosophical beliefs, health condition, intimacies can be performed by the Organization in compliance with the Russian Federation legislation in the following cases:

– the PD gave his/her consent in the written form;

– processing of PD allowed by the PD subject for distribution is performed subject to the prohibitions and conditions of the Federal law No. 152-FZ;

– PD processing is required due to implementation of international treaties of the Russian Federation on readmission;

– PD processing is performed in accordance with the Federal law dated January 25, 2002 No. 8-FZ "On the All-Russian population census";

– PD processing is performed in accordance with legislation on government social assistance, labor legislation, pension legislation of the Russian Federation;

– PD processing is required for protection of life, health or other vital interests of the PD subject or life, health or other vital interests of other persons provided it is impossible to obtain the consent of the PD subject;

– PD processing is required to establish or exercise rights of the PD subject or third parties as well as due to administration of justice;

– PD processing is performed in accordance with legislation of the Russian Federation on defense, on corruption combating;

– PD processing is performed in accordance with legislation on mandatory insurance types, insurance legislation;

– PD processing is performed in accordance with legislation of the Russian Federation on citizenship of the Russian Federation;

– processing of PD concerning state of health obtained as the result of PD depersonalization for the purposes of public or municipal management efficiency increase as well as for other purposes, in the order and under conditions provided by the legislation.

5.3. The Organization does not perform cross-border transfer of personal data to foreign states.

5.4. Processing of PD allowed by the PD subject for distribution is performed in the Organization on the basis of the consent of the PD subject for distribution subject to the prohibitions and conditions for PD processing set forth by the PD subject.

5.5. Processing of biometric personal data can be performed by the Organization only if there is PD subject consent in the written form excluding cases related to implementation of international treaties of the Russian Federation on readmission, due to implementation of justice and execution of court orders, due to performance of mandatory fingerprinting registration as well as in cases stipulated by the Russian Federation legislation on defense, on security, on counter-terrorism, on transport security, on anti-corruption, on police operations, on public services, on criminal executive, on entry to and exit from Russia, on citizenship of the Russian Federation, on notarial system.

5.6. The annex to the Policy provides for the list of PD processing purposes and categories corresponding to them and the processed PD list, subject categories which PD are processed, methods, terms of processing and storage of PD, their destruction procedure.

6. Legal ground for personal data processing

6.1. Legal grounds for personal data processing by the Organization are:

6.1.1. Labor code of the Russian Federation dated 30/12/2001 No. 197-FZ;

6.1.2. Civil Code of the Russian Federation (first part dated 30/11/1994 No. 51-FZ, second part dated 26/01/1996 No. 14-FZ, third part No. 146-FZ, fourth part dated 18/12/2006 No. 230-FZ);

6.1.3. Tax Code of the Russian Federation (first part dated 31/07/1998 No. 146-FZ and second part dated 05/08/2000 No. 117-FZ);

6.1.4. Federal Law dated 21/11/2011 No. 323-FZ ”On fundamental healthcare principles in the Russian Federation”;

6.1.5. Federal Law dated 06/12/2011 No. 402-FZ “On Accounting”;

6.1.6. Federal law dated 27/07/2006 No. 149-FZ “On Information, Information Technologies and the Protection of Information”;

6.1.7. Federal Law dated 08/02/1998 “On limited liability companies”;

6.1.8. Federal law dated 08/08/2001 No. 129-FZ “On the State Registration of Legal Entities and Private Entrepreneurs”;

6.1.9. Order of the Federal Agency of Records No. 236 dated 20/12/2019 “On Approval of the List of Standard Administrative Archival Documents Generated during Activities of Central and Local Governments and Entities, with Their Retention Periods Specified”;

6.1.10. other regulatory legal acts of the Russian Federation determining cases and specifics of PD processing;

6.1.11. Organization’s Bylaws;

6.1.12. Policy and other IR of the Organization;

6.1.13. civil law contracts, the party / beneficiary party / guarantee to which is the PD subject;

6.1.14. employment agreements;

6.1.15. consent of PD subjects for PD processing;

6.1.16. The User agreement posted on the link: https://www.vtb.med/documents/ru/user_agreement.pdf, the party / beneficiary party / guarantee to which is the PD subject.

7. Main rights and obligations of the Organization and personal data subjects

7.1. The Organization is entitled to:

– process PD on a legal ground, in accordance with purposes of the processing, requirements of the Russian Federation legislation, Policy provisions and other Organization IR;

– require the PD subject to provide reliable PD required to execute a contract, identification of a PD subject as well as in other cases stipulated by the Russian Federation legislation on PD;

– restrict access of the PD subject to his/her PD in case if their processing is performed in accordance with the Russian Federation legislation on anti-money laundering and terrorist financing or if access of the PD subject to his/her PD violates legal rights and interests of third parties as well as in other cases stipulated by the Russian Federation legislation;

– process PD allowed by the PD subject for distribution in accordance with the requirements of the Federal law No. 152-FZ;

– perform PD processing subjected to publishing / mandatory according to Russian Federation legislation;

– entrust another entity with the processing of PD if there is consent of the PD subject unless otherwise stipulated by the Russian Federation legislation based on a contract concluded with this person;

– provide PD of subjects to third parties in cases stipulated by the Russian Federation legislation (by requests of judicial, law enforcement and other authorities);

– other rights stipulated by the Russian Federation legislation.

7.2. The Organization shall:

– ensure PD protection against wrongful acts;

– during PD collection, including through use of the Internet, ensure recording, systematization, accumulation, storage, clarification (update, modification), retrieval of PD of citizens of the Russian Federation using databases located in the Russian Federation except for cases stipulated by Federal law No. 152-FZ;

– not disclose PD to third parties and not distribute PD without consent of the PD subject unless otherwise specified by federal laws;

– as provided by Federal law No. 152-FZ, inform the PD subject or its representative of PD related to the corresponding PD subject as well as to ensure that PD subject is made familiar with these PD upon request of the PD subject or his/her representative within 10 (ten) business days from the date of receipt of the request of the PD subject or his/her representative.

The specified period can be extended for no more than to 5 (five) business days in case of sending of a reasonable notice by the Organization to the PD subject with indication of reasons for extension of the requested information period;

– inform the PD subject about the legal consequences of his/her refusal to provide his/her PD in case if their provision is mandatory in accordance with the Russian Federation legislation;

– provide free access for the PD subject to his/her PD including the right to obtain copies of any records containing his/her PD except for the cases stipulated by the Russian Federation legislation;

– in case of PD subject / his/her representative provision of data confirming that PD are incomplete, inaccurate or outdated, alter them or ensure their clarification (if their processing is performed by another person entrusted by the Organization) within 7 (seven) business days;

– Stop the PD processing and destruct or ensure its termination or destruction (if processing is performed by another person entrusted by the Organization) upon achievement of the PD processing purpose within a period not exceeding 30 (thirty) days from the date of achievement of PD processing purpose unless otherwise specified by the contract, the party, beneficiary party or guarantee to which is the PD subject, other agreement between the Organization and the PD subject or if the Organization is not entitled to process the PD without consent of the PD subject on grounds stipulated by the Russian Federation legislation;

– in case of detection of illegal processing of PD, within a period not exceeding 3 (three) business days, stop PD processing or ensure termination of their processing by a person entrusted by Organization;

– in case if lawfulness of PD processing cannot be ensured, then within a term not exceeding 10 (ten) business days destruct such PD or ensure their destruction;

– in case where an illegal or occasional transfer (provision, distribution, access) of PD is established and resulted in breach of rights of PD subjects the Organization from the time of detection of such incident by the Organization, authorized authority for protection of PD subject rights or other party in interest shall notify the authorized authority for protection of PD subject rights:

1) within 24 (twenty-four) hours about the occurred incident, assumed causes resulted in breach of rights of PD subjects and assumed damage inflicted

to rights of PD subjects, taken measures for elimination of consequences of the incident as well as provide data on a person authorized by the Operator for interaction with the authorized authority for protection of PD subject rights for issues related to the revealed incident;

2) within 72 (seventy-two) hours on results of internal investigation of the revealed incident as well as to provide data on persons whose actions caused of the revealed incident (if any);

– in case of PD subject withdrawal of consent for processing his/her PD, stop PD processing and destruct the PD within a period not exceeding 30 (thirty) days from the date of receipt of the withdrawal unless otherwise specified by the contract, the party, beneficiary party or guarantee to which is the PD subject, other agreement between the Organization and the PD subject or if the Organization is not entitled to process the PD without consent of the PD subject on grounds stipulated by the Russian Federation legislation;

– provide PD only to authorized persons and to the extent required by them for discharge of labor duties according to the Russian Federation legislation and the Policy;

– assess the damage in accordance with requirements established by the authorized authority for protection of PD subject rights which can be inflicted to PD subjects in case of breach of the Russian Federation legislation, the correlation between the specified damage and the measures taken by the Organization to ensure discharge of duties stipulated by the legislation of the Russian Federation;

7.3. At request of the PD subject or his/her representative the Organization shall:

7.3.1. provide information concerning processing of his/her PD, particularly:

– confirmation of PD processing by the Organization;

– legal grounds and purposes of PD processing;

– PD processing methods used by the Operator;

– name and location of the Organization, data on persons (excluding Organization employees) having access to PD or to whom PD can be disclosed based on the contract with the Organization or based on federal laws;

– processed PD relating to the corresponding PD subject, the source of the PD, unless otherwise specified by the Russian Federation legislation;

– period for which the PD are processed including storage period;

– exercising PD subject rights stipulated by laws;

– information on performed or supposed cross-border data transfer;

– name or surname, name, patronymic and address of the person processing the PD entrusted by the Operator if processing is assigned to or will be assigned to such person;

– information on methods of the Organization’s responsibilities in the PD processing sphere;

– other data stipulated by the Russian Federation legislation.

7.3.2. clarify incomplete, outdated, inaccurate PD;

7.3.3. ensure blocking or destruction of PD in case if they are obtained illegally, are not required for the stated processing purpose or the PD subject consent was withdrawn.

7.3.4. at the request of the PD subject, stop transfer (distribution, transmission, access) of the PD previously allowed by him/her for distribution in cases envisaged by federal laws;

7.4. other duties stipulated by the Russian Federation legislation.

7.5. PD subjects / their representatives are entitled to:

– receive full information regarding their PD and these data processing (including automated processing);

– access to his/her PD including the right to obtain copies of any records containing subject PD except for the cases stipulated by Federal law No. 152-FZ;

– require clarification of his/her PD, their blocking or destruction in case of PD are incomplete, outdated, inaccurate, illegally obtained or are not required for the stated processing purpose;

– in case of a refusal of the Organization or a person authorized by him/her to eliminate or correct the subject PD, state on his/her disagreement in the written form having provided the corresponding grounds;

– withdraw his/her consent for PD processing;

– demand the Organization or a person authorized by him/her to notify all persons to whom incorrect or incomplete subject PD were provided, about all changes in them or exclusions from them;

– appeal in court against any unlawful acts / omissions of the Operator or its authorized person, carried out in the course of processing and protection of the subject's PD;

– demand to stop transfer (distribution, transmission, access) of their PD previously allowed for distribution;

– other rights stipulated by the Russian Federation legislation.

7.6. PD subjects / their representatives shall:

– provide accurate PD to the Operator;

– timely notify the Operator on all changes of PD;

– other duties stipulated by the Russian Federation legislation.

8. Procedure for review of requests of personal data subjects by the Organization

8.1. The PD subject can send requests to the Organization in relation to processing of his/her PD (including for clarification/blocking/destruction/ termination of PD processing) on paper to the following address: 8 Testovskaya Street, prem. 1/8, intra-city territory – municipal district Presnensky, Moscow, 123112 or by email: info@vtb.med.

8.2. Requests of PD subjects made in paper form include any written applications sent to the Organization's address including applications sent via post service offices.

8.3. The PD subject request can be sent in the electronic document form and signed with a digital signature in accordance with the Russian Federation legislation.

8.4. The Organization does not process requests related to transfer or disclosure of PD received over the phone or fax because it is not possible to identify the person of the PD subject.

8.5. The period of response provision on PD processing to the PD subject / his/her representative shall not exceed 10 (ten) business days from the date of application receipt.

The specified period can be prolonged but for no longer than 5 (five) business days provided that the Organization send a reasonable notice to the PD subject with indication of reasons for prolongation of that period.

8.6. The Organization provides information to the PD subject / his/her representative in the same form in which the corresponding application or request was sent unless otherwise specified in the application or the request.

9. Measures taken to protect personal data of personal data subjects

9.1. The Organization takes required and sufficient legal, organizational and technical measures for PD protection of PD subjects against illegal or occasional access to them, destruction, change, blocking, copying, distribution as well as against other illegal actions.

9.2. PD protection is ensured by the Organization according to the procedure established by the Russian Federation legislation and Organization IR, by implementation of the organizational and technical complex of measures ensuring their security.

9.3. PD protection measures taken in the Organization:

– PD security threat determination during their processing in the Organization ISPD;

– application of organizational and technical measures to ensure PD security during their processing in the Organization ISPD that ensures PD protection levels established by the Government of the Russian Federation;

– publishing the Organization IR regulating the PD processing and protection procedure in the Organization;

– appointment of persons responsible for organization of the PD processing and security assurance procedure;

– determination of the list of positions of the Organization employees having access to PD processing;

– methodical work and familiarization of the Organization workers directly processing PD with the Organization IR related to PD processing and protection, in accordance with the Russian Federation legislation on PD, including requirements to their protection;

– storage of tangible media of PD in compliance with the conditions ensuring their preservation and excluding unauthorized access to them;

– use of information protection means passed the assessment of compliance with requirements of the Russian Federation legislation related to the information security;

– premise access control excluding possible unauthorized entry or stay in premises with the information system of personal data for persons without right of access;

– other measures stipulated by the Russian Federation legislation.

9.4. PD protection measures are applied both on hard and soft information carriers.

10. Procedure for processing electronic user data including cookies

10.1. By visiting the Website and accepting this Policy by clicking the "Ok" button (or any other button that allows to confirm the fact of acceptance of the Policy by the User), the User expresses its consent to processing of cookies on the terms set out in the Policy.

10.2. Data which are automatically processed by the Website:

10.2.1. Standard data automatically obtained by the http-server upon access to the Website and further actions of the User (IP-address of the host, type of the operating system of the User, Website pages visited by the User).

10.2.2. Information from the system log is automatically transferred by the User browser each time when the User sends a request on access (i.e. visit) to the webpage. It can be also provided upon downloading the webpage content in the browser or a device of the User.

When the User uses the Website, the servers automatically record some information of the system log including the web request, address of Internet Protocol ("IP"), browser type, demand/exit page and URL addresses, number of clicks and information on actions of the User with references to the Website, domain names, advertising pages and other similar information. The Organization can also collect similar information from electronic messages sent to Users which then helps to track which messages are opened and on which references the Users click.

10.2.3. Information traffic between the User and the Organization including electronic messages concerning the Website (e.g. changes or update of Website characteristics, technical notifications and messages of the safety system).

10.2.4. Information of Users and on Users for analytical work by the Organization and use of third-party analytical services.

The Organization uses analytical information to ensure business analysis and operations, commercial analysis, development of products, improvement of products and services, personalization of content, provision of advertisement and development of recommendations. The Organization collects and uses this analytical information together with analytical information received from other Users.

10.3. The User is entitled to independently change settings of cookie receipt in settings of its browser or disable them fully without guarantee of preservation of full functional of the Website at any time.

10.4. The Organization processes cookies for implementation of the following purposes:

10.4.1. Website availability control assurance;

10.4.2. Website security provision;

10.4.3. analysis of data specified in it. 10.2 of the Policy;

10.4.4. Website development analysis.

10.5. The Organization is entitled to process cookies using automation means by collection, recording, systematization, accumulation, storage, clarification

(update, change), retrieval, use, transfer (provision, access), depersonalization, blocking, removal, destruction.

10.6. Cookies are processed from the moment the User accepts this Policy / begins using the Website until stated purposes of cookie processing are achieved or until the User refuses the cookie processing considering validity periods of cookies.

Annex

List of personal data processing purposes and categories corresponding to them and the processed personal data list, subject categories which personal data are processed, methods, terms of processing and storage of personal data, their destruction procedure

This Annex determines the purposes of PD processing by the Organization and categories corresponding to them and the list of processed PD, subject categories which PD are processed, methods, terms of processing and storage of PD, the procedure for their destruction upon achievement of purposes of their processing or occurrence of other legal grounds.

1. PD processing purpose: “Keeping personnel and accounting records”.

1.1. Within this purpose the Organization processes PD belonged to the following subjects:

- employees;
- family members and near relatives of employees;
- dismissed employees;
- representatives of specified PD subjects.

1.2. To achieve this purpose, the Organization processes the following PD:

- last name, name, patronymic (if any);
- year of birth;
- month of birth;
- date of birth;
- place of birth;
- marital status;
- social status;
- revenues;
- gender;
- email address;
- address of residence;
- registration address;
- phone number;
- insurance individual account number;
- taxpayer identification number;
- nationality;
- identification document details;
- data of the document of identification outside the Russian Federation;
- bank account details;
- current account number;
- personal account number;
- profession;
- position;

– information on employment (including work experience, data on current employment with indication of the name and current account of the organization);
– military status, information on military registration;
– information about education;
– previous last name, name, patronymic (if any) in case of their changes;
– information on possession(absence) of foreign citizenship, residence permit or other document confirming the right of permanent residence of a citizen of the Russian Federation on the territory of a foreign state;
– details of the health insurance policy of compulsory health insurance;
– information about the stay abroad;
– information on foreign language proficiency, degree of proficiency;
– information on scientific works, publications, inventions, patents;
– information from the employee's labor contract and additional agreements to the labor contract;
– information on state awards, other awards and insignia;
– information on participation in elected bodies;
– information on participation in commercial and other organizations;
– details of the certificate on state civil registration;
– information contained in documents confirming the right to benefits;
– photos and videos;
– information on registration of access to state secrets;
– professional characteristic;
– data on state of health;
– information on the state of health confirming the ability to perform the labor function, including being registered (not registered) in the healthcare authorities for mental illness, alcoholism or drug addiction;
– information on criminal convictions(absence) and (or) on fact of criminal prosecution or on termination of criminal prosecution.

1.3.Legal grounds for processing of the specified personal data:
– Labor code of the Russian Federation dated 30/12/2001 No. 197-FZ;
– Federal law "On Accounting" dated 06/12/2011 No. 402-FZ;
– Organization's Bylaws;
– Policy and other IR of the Organization;
– civil law contracts, the party / beneficiary party / guarantee to which is the PD subject;
– employment agreements;
– consent of PD subjects for PD processing.

1.4. Processing of the specified PD is performed by the mixed processing method of PD including:
– collection;
– recording;
– systematization;
– accumulation;

– storage;
– clarification (update, change);
– retrieval;
– use;
– transfer (provision, access);
– depersonalization;
– blocking;
– deletion;
– destruction.

1.5. Periods of PD processing and storage for achievement of the specified purpose are set considering requirements stated in it. 3.4 of the Policy.

1.6. PD which processing is performed for achievement of the specified purpose shall be destroyed subject to occurrence of conditions determined in it. 3.5 of the Policy.

2. PD processing purpose: “Getting feedback from the Organization by the User for further advice and information about Organization’s services”.

2.1. Within this purpose the Organization processes PD belonged to the following subjects:

– Users.

2.2. To achieve this purpose, the Organization processes the following PD:

– last name, name;
– phone number;
– email address;
– information of citizenship;
– Username in messengers (Telegram, WhatsApp, MAX).

2.3. Legal grounds for processing of the specified personal data:

– Federal law dated 27/07/2006 No. 149-FZ “On Information, Information Technologies and the Protection of Information”;
– Organization’s Bylaws;
– Policy and other IR of the Organization;
– consent of PD subjects for PD processing.

2.4. Processing of the specified PD is performed by the mixed processing method of PD including:

– collection;
– recording;
– systematization;
– accumulation;
– storage;
– clarification (update, change);
– retrieval;
– use;
– transfer;
– depersonalization;

– blocking;
– deletion;
– destruction.

2.5. Period of PD processing and storage for achievement of the specified purpose are set considering requirements stated in it. 3.4 of the Policy.

2.6. PD which processing is performed for achievement of the specified purpose shall be destroyed subject to occurrence of conditions determined in it. 3.5 of the Policy.

3. PD processing purpose: “Implementation of activities in the sphere of medical services export promotion”.

3.1. Within this purpose the Organization processes PD belonged to the following subjects:

– individuals applying for health care to Organization’s partners;
– legal representatives of specified PD subjects;

3.2. To achieve this purpose, the Organization processes the following PD:

– last name, name, patronymic;
– date of birth;
– gender, age;
– height, weight;
– nationality;
– address;
– registration address;
– phone numbers;
– email address;
– identification document details;
– medical insurance policy data;
– data on state of health;
– data on the fact that the person sought medical care, diseases, results of medical tests and investigations, X-ray data;
– bank account information.

3.3. Legal grounds for processing of the specified personal data:

– Federal Law dated 21/11/2011 No. 323-FZ” On fundamental healthcare principles in the Russian Federation”;
– Organization’s Bylaws;
– Policy and other IR of the Organization;
– consent of PD subjects for PD processing.

3.4. Processing of the specified PD is performed by the mixed processing method of PD including:

– collection;
– recording;
– systematization;
– accumulation;
– storage;

- clarification (update, change);
- retrieval;
- use;
- transfer;
- depersonalization;
- blocking;
- deletion;
- destruction.

3.5. Periods of PD processing and storage for achievement of the specified purpose are set considering requirements stated in it. 3.4 of the Policy.

3.6. PD which processing is performed for achievement of the specified purpose shall be destroyed subject to occurrence of conditions determined in it. 3.5 of the Policy.