

APPROVED

By Order No. 2 dated January 9, 2025
of Director General
of "AMC" LLC

Policy for Processing Personal Data of Visitors to the Website asiamc.ru

1. General

1.1. The operator for processing of personal data of visitors to the website asiamc.ru (hereinafter referred to as the Website) is "AsiaMedConsult" Limited Liability Company, located at: 27, Alexandra Solzhenitsyna St., Floor 1, Facility III, Room 10, Moscow, 109004, Russia (hereinafter referred to as "AMC" LLC, or the Operator).

1.2. The Operator makes the observance of rights and freedoms of a person and a citizen when processing his/her personal data, including the protection of the rights to privacy, personal and family secrets, as its primary goal and condition for its activities.

1.3. Key concepts used in this Policy:

Personal data — any information related to a directly or indirectly identified or identifiable natural person (subject of personal data);

Personal data operator (operator) — "AMC" LLC who organizes and (or) performs the processing of personal data independently or jointly with other persons, as well as determines the purposes of processing personal data, content of personal data subject to processing, actions (operations) performed with personal data.

Subject of personal data — a website visitor, being an individual who has accepted this Personal Data Processing Policy by providing the Operator with his/her personal data to the extent and within the scope required by the Operator.

Processing of personal data — any action (operation) or a combination of actions (operations) with personal data, performed with or without the use of automation tools. Processing of personal data includes, among other things:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- clarification (update, modification);
- retrieval;
- usage;
- transfer (distribution, provision, access);
- depersonalization;
- blocking;
- deletion;
- destruction.

Automated processing of personal data — processing of personal data using computer technologies;

Dissemination of personal data — actions aimed at the disclosure of personal data to an indefinite group of persons;

Provision of personal data — actions aimed at the disclosure of personal data to a specific person or a specific group of persons;

Blocking of personal data — temporary termination of processing of personal data (except in cases where the processing is necessary to clarify personal data);

Destruction of personal data — an action, as a result of which it becomes impossible to restore the content of personal data in a personal data information system and/or as a result of which the tangible media of personal data are destroyed;

Depersonalization of personal data — an action, as a result of which it becomes impossible to determine the ownership of personal data by a specific subject of personal data without the use of additional information;

Personal data information system — a set of personal data contained in databases and the information technologies and technical means that ensure their processing.

Cookie files — data that are automatically transferred to the Company during the use of the Sites by means of the software installed on the user's device, including the IP address, geographic location, information about the browser and type of operating system of the user's device, specifications of the equipment and software used by the user, date and time of access to the Operator's website. By accepting the terms of the Policy, you agree to use cookie files.

1.4. The Policy regarding the processing of personal data of website visitors (hereinafter referred to as the Policy) defines any action (operation) or a combination of actions (operations) for the collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, usage, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data, as well as the information on the implemented requirements for the protection of personal data.

1.5. The Policy was developed in accordance with the current legislation of the Russian Federation and the processing of personal data is based on the following regulatory legal acts:

- Constitution of the Russian Federation;
- Federal Law No. 152-FZ "On personal data" dated July 27, 2006;
- Federal Law No. 149-FZ "On information, information technologies and information protection" dated July 27, 2006;
- Resolution of the Government of the Russian Federation No. 687 "On the approval of the regulation on the specific nature of personal data processing without using the automation tools" dated September 15, 2008;
- Resolution of the Government of the Russian Federation No. 1119 "On the approval of requirements for the protection of personal data when processing them in personal data information systems" dated November 1, 2012;
- Order of the Federal Service for Technical and Export Control (FSTEC) of Russia No. 21 "On the approval of the composition and content of organizational and technical measures to ensure the security of personal data when processing them in personal data information systems" dated February 18, 2013;
- Order of the Federal Service for Supervision of Communications, Information Technology, and Mass Media (Roskomnadzor) No. 996 "On the approval of requirements and methods for personal data depersonalization" dated September 5, 2013;
- Other regulatory legal acts of the Russian Federation and regulatory documents of competent public authorities.

1.6. "AMC" LLC processes personal data of website visitors on a lawful and fair basis. The processing of personal data is limited to achieving specific, predetermined and lawful purposes. The processing of personal data incompatible with the purposes of collecting personal data is prohibited.

1.7. "AMC" LLC does not allow the unification of databases containing personal data, the processing of which is carried out for purposes incompatible with each other. Only personal data that meet the purposes of processing them are subject to processing.

1.8. The content and volume of the personal data being processed correspond to the specified purposes of processing. The personal data being processed are not excessive in relation to the specified purposes of their processing.

1.9. When processing personal data, the accuracy of the personal data, their sufficiency and, where necessary, relevance in relation to the purposes of processing the personal data are ensured. The operator takes necessary steps or ensures that they are taken to delete or clarify any incomplete or inaccurate data.

1.10. Processed personal data are subject to destruction or depersonalization upon achievement of the processing purposes or in the event of loss of the need to achieve these purposes, unless otherwise provided by federal law.

1.11. In accordance with Part 3 of Article 6 of Federal Law No. 152-FZ "On personal data" dated July 27, 2006, "AMC" LLC has the right to delegate the processing of personal data of a personal data subject to other parties. In this case, the operator is responsible to the personal data subject for the actions of the said party.

2. Purposes of personal data processing

2.1. Personal data of website visitors are processed by "AMC" LLC for the following purposes:

- execution of agreements on providing access to the Site, its Content and/or Services, to the functions of the Service, for the administration of the Site;
- identification upon registration on the Site and/or when using the Service;
- provision of services, processing of requests and applications;
- establishing feedback, including sending of notifications and requests;
- providing customer support;
- informing the User about the procedure of executing civil law contracts signed with the Operator;
- confirmation of completeness of the personal data provided;
- signing contracts, performing mutual settlements;
- collection of statistics by the Operator;
- improving the quality of the Site and/or its Service, convenience of use and development of new services;
- conducting marketing (advertising) events, sending proposals by the Operator and receiving them by the User for the promotion of the Operator's services on the market, including through direct contacts;
- recruitment and selection of candidates for employment by the Operator.

3. Composition of personal data and terms of their processing

3.1. All personal data processed by "AMC" LLC are confidential and strictly protected information in accordance with the law.

3.2. The personal data subject to processing, depending on the purposes, timeframes and necessity of processing, may include: full name; mobile phone number, email address, cookie files.

3.3. The operator stores personal data in the form allowing the identification of the subject of personal data, no longer than required by the purposes of processing personal data, unless the storage period of personal data is established by federal law or a contract to which the subject of personal data is a party, beneficiary or guarantor.

3.4. The User may at any time revoke his/her consent to the processing of personal data by sending the Operator a notification via e-mail to the Operator's e-mail address at info@asiamc.ru with the subject line "Revocation of consent to the processing of personal data".

4. The procedure for collection, storage, transfer and other processing of personal data

4.1. The processing of personal data is carried out in an automated and non-automated manner.

4.1.1. Personal data processing performed without the use of automation tools is carried out in such a way that for each category of personal data it is possible to determine the storage locations of personal data (tangible media). The operator issued a list of parties that process personal data or have access to them. Separate storage of personal data (tangible media) processed for different purposes is ensured. The operator ensures the safety of personal data and takes measures to prevent unauthorized access to personal data.

4.1.2. The processing of personal data using automation tools is carried out subject to performing the following actions:

- the operator carries out technical measures aimed at preventing unauthorized access to personal data and/or their transfer to parties that do not have the right to access such information;
- protective tools are configured to promptly detect the facts of unauthorized access to personal data;
- technical means of automated processing of personal data are isolated in order to prevent any impact on them that could result in disruption of their functioning;
- the operator makes backup copies of data in order to be able to immediately restore personal data modified or destroyed due to unauthorized access to them;
- constant monitoring is carried out to ensure the level of protection of personal data.

4.2. Only persons who have undergone a certain admission procedure are allowed to process personal data, which includes:

- familiarization of a person with local regulations governing the order and procedure for working with personal data;
- taking from the employee a written consent to maintain confidentiality regarding personal data when working with them;

• receipt by an employee and use of individual attributes of access to information systems containing personal data. At the same time, each employee is given the minimum rights to access personal data information systems necessary for the performance of their work duties.

Employees having access to personal data receive only the personal data that they need to perform their specific job duties.

4.3. Personal data are stored in electronic format.

4.3.1. Personal data are stored in electronic format in databases of personal data information systems, as well as in archival (backup) copies of the databases of such personal data information systems.

When storing personal data, organizational and technical measures are taken to ensure their security and prevent unauthorized access to them, including, but not limited to:

- appointment of an employee responsible for the processing of personal data;
- restriction of physical access to places where personal data are processed, including the installation of locking devices, limitation of a number of persons having access, etc.;
- removable tangible media on which backup copies of personal data of personal data subjects are stored (if necessary, they are marked and recorded in the registration log of registration, accounting and issue of external media for storing backup copies of personal data);
- accounting of all information systems, electronic media, as well as archival copies;
- application of certified means of information protection and cryptographic means of information protection

The detailed procedure is governed by the Operator's internal local regulations.

4.4. For the purposes of data processing, "AMC" LLC may transfer personal data to:

- responsible employees;
- third parties who have signed an obligation to observe the confidentiality and security of the information received on behalf of "AMC" LLC, which must specify a list of actions (operations) with personal data that will be performed by the person processing the personal data and the purposes of the processing, set the obligation of such person to maintain the confidentiality of personal data and ensure the security of personal data during their processing, and must also specify the requirements for the protection of personal data being processed in accordance with Article 19 of Federal Law No. 152-FZ "On personal data";

• at the request of the inquiry and investigation bodies, the court in connection with the investigation or trial, at the request of the penal system body in connection with the execution of a criminal sentence and the exercise of control over the behavior of a conditionally sentenced person, a convicted person for whom serving the sentence was deferred, and a person released on parole.

Personal data transfer to third parties in other cases is possible only with the consent of the subject of personal data and only for the purpose of fulfilling obligations to the subject of personal data.

When transferring personal data in electronic form to third parties via open communication channels, "AMC" LLC must take all necessary measures to protect the transferred information in accordance with the requirements of the current legislation of the Russian Federation in the manner governed by local acts.

4.5. Changes to personal data are made on the basis of an application from the subject of personal data, on the basis of official documents containing the personal data of the subject of personal data, and in other legal cases.

4.6. Personal data shall be stored no longer than required for the purposes of their processing and shall be subject to destruction upon achievement of the purposes of processing or in the event of loss of the need to achieve them.

Destruction from media, including media containing personal data of subjects, must comply with the following rules:

- be as reliable and confidential as possible, excluding the possibility of subsequent recovery;
- be formalized by a corresponding act;
- destruction should relate only to those personal data that are subject to destruction in connection with the achievement of the purpose of processing the said personal data or the loss of the need to achieve them, without allowing accidental or intentional destruction of relevant media.

5. Rights and obligations of the personal data subject

5.1. The subject of personal data has the right to:

- require clarification of their personal data, their blocking or destruction if the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, and also take measures provided by law to protect their rights;
- request a list of their personal data processed by the Operator and the sources of receipt;
- receive information about the processing periods of their personal data, including storage periods;
- appeal to the authorized body for the protection of rights of personal data subjects or in court against illegal actions or inactions during the processing of their personal data;
- protect their rights and legitimate interests, including compensation for losses and/or compensation for moral damages in court;
- revoke consent to the processing of personal data in cases provided by law.

The subject of personal data may obtain the requested information or revoke consent to the processing of personal data by submitting a written request to "AMC" LLC by e-mail at info@asiamc.ru. A response containing the requested information or a reasoned refusal to provide it shall be sent to the address specified in the request within thirty (30) days.

The procedure for processing requests from personal data subjects to exercise their legal rights is carried out in accordance with an approved internal document developed in accordance with current legislation in the field of personal data protection and is controlled by the employee responsible for processing personal data.

6. Information on the implemented requirements for the protection of personal data

6.1. "AMC" LLC receives personal data from personal data subjects and from third parties (that are not personal data subjects). In doing so, "AMC" LLC fulfills the obligations stipulated by the Federal Law No. 152-FZ "On personal data" dated July 27, 2006 when collecting personal data.

6.2. The Company shall cease processing personal data in the following cases:

- upon occurrence of conditions for termination of the processing of personal data or upon expiration of the established periods;
- upon achieving the purposes of processing or in the event of loss of the need to achieve these purposes;
- at the request of the subject of personal data, if the personal data processed by "AMC" LLC are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing;
- in the event of detection of unlawful processing of personal data, if it is impossible to ensure the legality of the processing of personal data;
- in the event of withdrawal by the subject of personal data of consent to the processing of his/her personal data or the expiration of such consent (if personal data are processed by "AMC" LLC solely on the basis of the consent of the subject of personal data);
- in case of liquidation of "AMC" LLC.

6.3. In order to ensure the fulfillment of obligations stipulated by the Federal Law of the Russian Federation "On personal data" and regulatory legal acts adopted in accordance with it, "AMC" LLC has taken the following measures:

- a person responsible for organizing the processing of personal data is appointed;
- local acts on the issues of processing and ensuring the security of personal data, as well as local acts establishing procedures aimed at preventing and identifying violations of Russian legislation and eliminating the consequences of such violations were issued:
 - this Policy;
 - other local acts on the issues of processing and ensuring the security of personal data;
- legal, organizational and technical measures are applied to ensure the security of personal data;
- internal control is carried out to ensure that the processing of personal data complies with the requirements of Federal Law No. 152-FZ "On personal data" dated July 27, 2006 and the regulatory legal acts adopted in accordance with it, this Policy, and local acts of the Company;
- employees of "AMC" LLC directly involved in the processing of personal data are familiar with the provisions of Federal Law No. 152-FZ "On personal data" dated July 27, 2006 and regulatory legal acts adopted in accordance with it, this Policy and local acts on the issues of processing personal data.

6.4. The Company implements the following requirements for the protection of personal data:

- the security assurance strategy is organized for the premises where information systems are located, preventing the possibility of uncontrolled entry or presence in these premises of persons who do not have the right to access these premises;
- the security of personal data carriers is ensured;
- information security tools are used that have undergone a procedure for assessing compliance with the requirements of the Russian legislation in the field of information security;
- the requirements established by Resolution of the Government of the Russian Federation No. 687 “On the approval of the regulation on the specific nature of personal data processing without using the automation tools” dated September 15, 2008 are implemented.

7. Provisions for privacy and personal information protection

7.1. “AMC” LLC processes personal data of subjects collected on the website. Personal data collected on the website include:

- email address of a site visitor;
- telephone number of a website visitor;
- the last name, first name, and patronymic of a website visitor;
- cookie files;
- data about visitors collected using Internet statistics services (Yandex Metrika)
- user data (location information; OS type and version; browser type and version; device type and its screen resolution; source from which the user came to the site; from which site or by which advertisement; OS and browser language; which pages the user opens and which buttons the user clicks; IP address);
- other data that the website user may, on his/her own initiative, send to the Operator in freely fillable fields of feedback forms or in files attached to them.

7.2. The operator records cookie files on the device of the website visitor, which the client uses to implement their needs on the website. Cookie files are small pieces of data sent by the web-server and stored on the electronic device of the website visitor. They are used to simplify the customer experience of using the website, collect analytics by the Operator to improve the quality of services provided on the website, generate statistics on website use and optimize advertising messages. Cookie files do not contain confidential information. The website visitor hereby consents to the collection, analysis and use of cookie files, including by third parties, for the purposes specified in this clause.

7.3. The Operator’s website collects and processes anonymized data about visitors (including cookie files) using Internet statistics services (YandexMetrika. We use the information obtained through and Yandex.Metrika only to improve the services on these Sites. We do not combine the information obtained through Yandex.Metrika with personal data. By continuing to use our Sites, you consent to the processing of cookie files, user data (location information; OS type and version; browser type and version; device type and its screen resolution; source from which the user came to the site; from which site or by what advertisement; OS and browser language; which pages the user opens and which buttons the user clicks; IP address) for the purpose of website functioning, improving the quality of the Site and/or its Service, the convenience of use and the development of new services and services; conducting statistical research and reviews. If you do not want your data to be processed, leave the Operator’s website. The ability of Yandex to use and transfer to third parties the information collected by the tool and Yandex.Metrika about your visits to the Operator’s website is limited by the Privacy Policy and Yandex policy, respectively. You can prevent Yandex.Metrika from recognizing you on revisits to the Operator’s website by disabling Yandex.Metrika cookie files in your browser. By accepting the terms of this Policy, you agree to the use of cookie files and transfer of the above-specified information.

7.4. The operator receives information about the IP address of the website visitor. This information is not used to identify the website visitor.

8. Information about the Operator

8.1. “AMC” LLC (Primary State Registration Number (OGRN): 1137746433879) registered address: 27, Alexandra Solzhenitsyna Street 27, Floor 1, Facility III, Room 10, Moscow, 109004, Russia.

9. Final Provisions

9.1. This Policy is subject to change and supplementation in the event of the emergence of new legislative acts and special regulatory documents on the processing and protection of personal data.

9.2. This Policy is an internal document of “AMC” LLC and is subject to posting on the website.

9.3. Control over compliance with the requirements of this Policy is carried out by the person responsible for ensuring the security of personal data of “AMC” LLC.

User's Consent to Processing of Personal Data

In accordance with Articles 23, 24 of the Constitution of the Russian Federation, Federal Law No. 152-FZ "On personal data" dated July 27, 2006, the Policy for processing personal data of visitors to the website asiamc.ru, posted on the website of "AsiaMedConsult" Limited Liability Company at: <https://asiamc.ru/> (hereinafter the Policy for PD Processing):

I, the subject of personal data (hereinafter referred to as the User), by entering my data in the special fields, placing the consent symbol (tick) in the special field (checkbox) and then clicking the "Submit" button, being the subject of personal data, voluntarily, of my own free will and in my interests, in accordance with requirements of Federal Law No. 152- FZ "On personal data" dated July 27, 2006, express my full, unconditional and unequivocal consent to the processing of my personal data (hereinafter referred to as the Consent) for the use of the website asiamc.ru and its services (hereinafter referred to as the Site, Services), and in the future when using the Site and/or its Services, on the following terms:

1. The consent is issued to "AsiaMedConsult" Limited Liability Company ("AMC" LLC, Taxpayer Identification Number (INN): 7709929540, Primary State Registration Number (OGRN): 1137746433879), located at: 27, Alexandra Solzhenitsyna St., Floor 1, Facility III, Room 10, Moscow, 109004, Russia (hereinafter referred to as the Operator).

2. The consent is given for the processing of personal and other data specified by the User in special fields by filling in the relevant special fields and/or attached files, namely the following categories:

- last name, first name, e-mail address, telephone number;
- other information provided by the User of the Site in the "Comment" field or in files uploaded by the User, on the basis of which it is possible to identify him/her as the subject of personal data.

3. The consent is given for the processing of personal data for the purposes of:

- provision of services, processing requests and applications.

The User hereby confirms, is aware and agrees that for the above purposes, that the Operator has the right to collect and use additional information related to the User, received during the User's access to the Site, its Content and/or Service, or from third parties, and including data on technical means (including mobile devices) and methods of technological interaction with the Site and/or its Service (including the host IP address, the type of the User's operating system, browser type, geographic location, provider data, etc.), on the User's activity when using the Site and/or its Service, cookie files, information on errors returned to the User, on downloaded files, videos, tools, as well as other data obtained in accordance with the methods established by the PD Processing Policy; manage statistical information related to the functioning of the Site and/or its Service, as well as the User's information for the purposes of organizing the functioning and technical support of the Site and/or its Service and fulfilling the conditions of the legislation of the Russian Federation, and the PD Processing Policy developed in accordance with it.

4. The consent is given for the processing of personal data in a mixed (automated and non-automated) manner.

In the process of processing personal data, the Operator has the right to: collect, record, systematize, accumulate, store, and clarify (update, change), extract, use, transfer (distribution, provision, access), depersonalize, block, delete, destroy the User's personal data.

5. The User hereby confirms that:

5.1. The User gives the Operator consent to the processing of his/her personal data specified in paragraph 2 hereof, and also confirms that the Operator has explained the consequences of failure to provide personal data, in cases where the provision of such data is mandatory in accordance with federal law.

5.2. The User is informed on the possibility of revoking consent based on the provisions of Federal Law No. 152-FZ "On personal data" dated July 27, 2006 by means of a personal request or a written request (including in the form of an electronic document signed with a simple electronic signature or an enhanced qualified electronic signature) addressed to the persons specified in paragraph 1 hereof, including the right to revoke Consent for the purpose of terminating the processing by the person specified in paragraph 1 hereof of both all personal data specified in paragraph 2 hereof and separately biometric personal data (if these are requested by the Operator and provided by the User).

5.3. The User is informed that persons specified in paragraph 1 of this Consent have the right to continue processing the User's personal data after receiving the revocation of the Consent, as well as after the expiration of the Consent, if there are grounds provided for in Part 2 of Article 9 of Federal Law No. 152-FZ "On personal data" dated July 27, 2006.

6. The consent enters into force from the moment of its sending and may be revoked by the User by sending a written statement in any format to the Operator by e-mail at: info@asiame.ru or by any other means that enables to clearly determine the fact of its receipt by the addressee.

7. The consent is valid for an indefinite period until it is revoked by the User. The consent ceases to be valid from the date specified in the User's application for the revocation of the Consent to PD Processing, but not earlier than the date following the date of actual receipt of the revocation of the Consent by the Operator.

8. The date and time of formation, confirmation and sending of the Consent shall be considered to be the moment of marking the corresponding field (or clicking the corresponding button) in the Form and/or clicking the button for sending the Form on any page of the Site and/or its Service.

9. Being guided by Part 4 of Article 9 of Federal Law No. 152-FZ "On personal data" dated July 27, 2006, I send my personal data through a personal mobile device or personal computer by attaching it to a special form or by filling in the appropriate fields of such a form when completing the registration procedure on the Site.

10. The User has been advised that the responsibility to him/her for the actions of the person processing his/her personal data on behalf of the Operator is assumed by the Operator who issued the relevant order (consent).