



PRIVACY AND PERSONAL DATA PROCESSING POLICY

1. GENERAL PROVISIONS

1.1. This Privacy and Personal Data Processing Policy (the “Policy”) outlines the procedures for collecting, processing, storing, using, transferring, and protecting personal data of data subjects by Limited Liability Company “INNOBIOTECH” (the “Company,” “Operator,” or “Organization”).

Operator’s Details:

Full name: INNOBIOTECH Limited Liability Company

Short name: INNOBIOTECH LLC

Legal address: 119421, Russian Federation, Moscow, Obruchevsky District, Leninsky Avenue, 105, Building 1, Room 16N

OGRN: 1183850011510

INN: 3849068999

KPP: 772801001

Email: info@innobiotech.ru

Website: <http://innobiotech.ru>

1.2. This Policy is developed in accordance with Federal Law No. 152-FZ of July 27, 2006 “On Personal Data,” Federal Law No. 149-FZ of July 27, 2006 “On Information, Information Technologies and Protection of Information,” Government Decree No. 1119 of November 1, 2012, and other applicable legislation of the Russian Federation.

1.3. The purpose of this Policy is to ensure the protection of individual rights and freedoms in the processing of personal data, including the right to privacy, personal and family confidentiality, and to define the procedures and security measures for such processing by the Company.

1.4. This Policy applies to all personal data processed by the Company, both with and without automated tools, provided that manual processing is functionally equivalent to automated processing.

1.5. This Policy is a public document. Before providing personal data, the data subject must read this Policy. By providing their personal data, the data subject unconditionally agrees to the terms of this Policy.

1.6. If the data subject does not agree with the terms of this Policy, they must refrain from providing personal data and from using the Company’s services.

1.7. The Company may amend this Policy. The new version takes effect upon its publication on the Company’s website unless otherwise specified. The current version is available at: http://innobiotech.ru/en/privacy_policy.pdf. Updates become effective upon publication unless stated otherwise.

2. TERMS AND DEFINITIONS

- Personal data: Any information relating to an identified or identifiable natural person (data subject).
- Data subject: A natural person to whom personal data relates.
- Personal data operator: A legal or natural person, alone or jointly with others, who organizes and/or performs the processing of personal data and determines the purposes, scope, and means of such processing.
- Processing: Any action or series of actions performed on personal data, whether automated or not, including collection, recording, systematization, accumulation, storage, updating, retrieval, use, transfer, blocking, deletion, or destruction.
- Combined processing: Use of both automated and manual methods for data processing.
- Dissemination: Making personal data available to an indefinite number of persons.
- Provision: Making personal data available to a specific person or group.
- Blocking: Temporary suspension of data processing.
- Destruction: Making personal data unrecoverable in information systems or on physical media.
- Personal data information system: A set of databases and IT tools used for processing personal data.
- Cookies: Small text files stored on a user’s device to identify the user, save preferences, and improve website functionality.
- Confidentiality: The obligation to prevent unauthorized disclosure of personal data.

3. LEGAL GROUNDS FOR PROCESSING

3.1. The Company processes personal data based on:

- The data subject's consent;
- Legal requirements or to fulfill the Company's statutory obligations;
- Execution of a contract with the data subject or in their interest;
- Protection of the life, health, or vital interests of the data subject when consent cannot be obtained;
- Legitimate interests of the Company or third parties, or for socially significant purposes, provided such processing does not violate the rights of the data subject.

4. DATA SUBJECT CATEGORIES AND TYPES OF DATA PROCESSED

4.1. Data subjects include:

- Current and potential clients;
- Contractors and their representatives;
- Visitors to Company premises;
- Website users and individuals contacting the Company;
- Representatives of regulatory and supervisory authorities;
- Other individuals relevant to processing purposes.

4.2. The Company may process the following personal data:

- Full name, date and place of birth, gender, citizenship;
- Passport or other ID details;
- Residential and temporary address;
- Contact numbers, email address;
- Banking details;
- Technical data from website usage (IP address, browser, OS, page visits, timestamps);
- Cookies and similar technologies;
- Other data necessary to achieve the processing purposes.

4.3. The Company does not process special categories of personal data (e.g., race, religion, beliefs, private life) unless required by law.

4.4. The Company does not process biometric data unless explicitly permitted by law.

5. METHODS OF OBTAINING PERSONAL DATA

5.1. Personal data may be obtained:

- Directly from the data subject (e.g., forms, in-person meetings);
- Through communication (phone, email);
- Automatically via website (technical data, cookies);
- Through contracts or public sources;
- From third parties where permitted by law or with consent;
- By other lawful means.

5.2. When required, the Company informs data subjects of:

- Purposes, legal grounds, and methods of processing;
- Retention periods;
- Data subject rights.

6. COOKIE USAGE

6.1. Cookies may be stored on the user's device when visiting the Company's website. They are used to ensure proper functionality, analyze traffic, personalize content, and improve user experience.

6.2. Users can manage cookies through browser settings. Disabling cookies may reduce site functionality.

6.3. Cookies do not contain directly identifying information but may include unique device/browser identifiers.

7. PERSONAL DATA PROCESSING PROCEDURE

7.1. Processing is lawful and limited to specific, predefined purposes. Processing for incompatible purposes is not allowed.

7.2. Only data relevant to the stated purposes shall be processed. The content and volume must match the declared purposes.

7.3. The Company ensures data accuracy, sufficiency, and, when needed, relevance.

7.4. Processing actions may include: collection, storage, updating, retrieval, transfer, blocking, deletion, destruction.

7.5. Combined processing is performed using both manual and automated methods.

8. TRANSFER TO THIRD PARTIES

8.1. Personal data may be transferred to third parties only with the data subject's consent, unless otherwise required by law.

8.2. Transfers may occur:

- With data subject's consent;

- In accordance with law and procedures;
- During sale or transfer of the business (obligations under this Policy transfer to the new owner);
- To protect rights and legitimate interests if the data subject breaches agreements with the Company.

9. DATA RETENTION PERIOD

- 9.1. Personal data is retained only as long as necessary for processing purposes, unless otherwise provided by contract, consent, or law.
- 9.2. Upon fulfillment of purpose or withdrawal of consent, data is deleted within 30 days, unless otherwise provided.
- 9.3. If immediate deletion is not possible, the data is blocked and destroyed within six months unless federal law requires otherwise.
- 9.4. Data is stored in identifiable form no longer than necessary for processing purposes unless required by contract or law.

10. SECURITY MEASURES

- 10.1. The Company implements legal, organizational, and technical measures to protect personal data from unauthorized access, destruction, modification, disclosure, or other unlawful actions.
- 10.2. Information security includes:
 - Identifying potential threats;
 - Creating threat models;
 - Implementing protective systems;
 - Monitoring effectiveness of protection measures.
- 10.3. Organizational measures include:
 - Appointing a data protection officer;
 - Access restrictions and training for authorized staff;
 - Logging access and operations;
 - Incident response and recovery planning.
- 10.4. Technical measures include:
 - Preventing unauthorized access;
 - Intrusion detection;
 - Ensuring integrity and confidentiality;
 - Enabling prompt data recovery;
 - Continuous protection monitoring.

11. DATA SUBJECT RIGHTS

- 11.1. Data subjects may request information on:
 - Whether processing is taking place;
 - Legal grounds and purposes;
 - Processing methods;
 - Operator's identity and address;
 - Recipients of data;
 - Data sources and retention periods;
 - Their rights and how to exercise them.
- 11.2. Data subjects may request correction, blocking, or deletion of inaccurate, outdated, unlawfully obtained, or unnecessary data.
- 11.3. Consent may be withdrawn in writing via email to info@innobiotech.ru or to the Company's postal address.
- 11.4. Complaints may be submitted to the data protection authority or to court.

12. OPERATOR OBLIGATIONS

- 12.1. The Company must provide requested processing information within the timeline established by law.
- 12.2. If access to data is denied, the Company must state the legal reason.
- 12.3. The Company must demonstrate that valid consent was obtained if required by law.
- 12.4. The Company must cease processing upon a lawful request from the data subject.
- 12.5. The Company must notify the data subject of actions taken to correct violations.

13. LIABILITY

- 13.1. Persons responsible for violating data protection laws may be subject to civil, criminal, administrative, disciplinary, or other legal liability.
- 13.2. The Company is responsible for complying with the principles and rules of personal data processing established by Russian law.

14. FINAL PROVISIONS

- 14.1. This Policy is effective from the date of approval and remains valid until replaced.

14.2. Disputes arising under this Policy shall be resolved through negotiation. If unresolved, they will be settled in accordance with applicable Russian law.

14.3. If any provision of this Policy conflicts with current law, that provision shall be invalid without affecting the remainder of the Policy.