

Revised January 11, 2021

## **ABBYY PRODUCTION LLC Personal Data Processing Policy**

### **1. General Provisions**

1.1. This Personal Data Processing Policy (hereinafter, “this Policy”) is pursuant to paragraph 2, article 18.1 of Russian Federal Law No. 152-FZ “On Personal Data,” adopted July 27, 2006, and applies to all personal data processed by ABBYY PRODUCTION LLC (hereinafter “the Operator”).

1.2. The purpose of this Policy is to define the categories of personal data that may be processed by the Operator and set forth the general principles for the processing of personal data by the Operator.

1.3. This Policy shall be binding on all the Operator’s employees, on all entities that receive personal data from or provide personal data to the Operator, and on all natural persons entering into contracts with the Operator.

1.4. In this Policy, the following terms shall have the following meanings:

– “**Personal data**” means any information relating, directly or indirectly, to an identified or identifiable natural person (“data subject”).

– “**Operator**” means a public authority, a municipal body, a legal entity, or a natural person that processes and/or organizes the processing of personal data, either on its own or in collaboration with others, and determines the purposes of such processing, the set of personal data to be processed, and the operations to be performed on such personal data.

– “**Processing**” means an operation or a set of operations performed on personal data, whether or not by automated means, including, without limitation:

- collection
- recording
- structuring
- accumulation
- storage
- correction (updating, alteration)
- retrieval
- use
- transfer (dissemination, provision, or otherwise making available)
- depersonalization
- restriction
- deletion

- destruction.
- “**Automated processing**” means the processing of personal data by means of computers.
- “**Dissemination**” means any operations on personal data resulting in the disclosure of personal data to undefined third parties.
- “**Provision**” means any operations on personal data resulting in the disclosure of personal data to a specific person or persons.
- “**Restriction**” means a temporary cessation of the processing of personal data (unless processing is required in order to correct personal data).
- “**Destruction**” means any operations resulting in an inability to recover personal data from the information system in which the personal data was stored and/or in the destruction of the tangible media on which the personal data was recorded.
- “**Depersonalization**” means any operations resulting in an inability to associate personal data with its subject without the use of some additional information.
- “**Information system**” means a combination of hardware and software used for processing personal data together with databases containing personal data.
- “**Cross-border transfer**” means any transfer of personal data to a foreign public authority, entity, or natural person located in a foreign country.
- “**Confidentiality**” means the obligation of the Operator and any other persons receiving access to personal data not to disclose or disseminate personal data without the prior consent of the data subject, unless otherwise required by applicable laws of the Russian Federation.

1.5. A data subject and his/her authorized representatives may:

- obtain complete information about the data subject’s personal data and its processing, whether or not by automated means;
- freely access the data subject’s personal data, at no charge, including obtaining copies of any records containing the data subject’s personal data, unless otherwise provided by applicable laws of the Russian Federation;
- require removal or correction of the data subject’s personal data deemed inaccurate or incomplete or processed in violation of applicable laws of the Russian Federation;
- file a written complaint, providing grounds for such complaint, if the Operator, or the person acting on behalf of the Operator, refuses to remove or correct the data subject’s personal data;
- require that the Operator, or the person acting on behalf of the Operator, inform all the persons that have previously received inaccurate or incomplete personal data of the data subject about all the alterations or removals of such personal data.
- dispute in court any action or omission of the Operator, or the person acting on behalf of the Operator, relating to the processing and protection of the data subject’s personal data.

1.6. A data subject and his/her authorized representative shall:

- provide accurate personal data to the Operator;
- promptly notify the Operator of any changes to the data subject’s personal data.

1.7. Where there is a legal basis for the processing of personal data, the Operator may process personal data only for the declared purposes and in compliance with the requirements of applicable laws of the Russian Federation, this Policy, and other rules and procedures of the Operator.

1.8. The Operator shall:

- at its own expense and in accordance with the procedures established by applicable laws of the Russian Federation, ensure the protection of personal data against unlawful use or loss;
- upon a data subject's request, provide him/her with information relating to the processing of his/her personal data, or reject the data subject's request for such information if the Operator is allowed or obliged to do so by applicable law;
- ensure free access by data subjects to their personal data, at no charge, including provision of copies of any records containing the data subject's personal data, unless otherwise provided by applicable laws of the Russian Federation;
- upon a data subject's request, correct, restrict or remove his/her personal data if such personal data is found to be incomplete, obsolete, inaccurate, unlawfully obtained or not essential for the declared purpose of processing;
- maintain a registry of data subjects' requests, recording all requests for personal data and all instances of provision of personal data upon request;
- notify data subjects of any processing of their personal data where such personal data is obtained from persons other than their data subject;
- once the purposes of the processing have been achieved, cease the processing of the personal data and destroy the personal data within thirty days from the day when the purposes of the processing have been achieved, unless otherwise provided by applicable laws of the Russian Federation, providing written notice to that effect to the data subject or his/her authorized representative, or, where a request is submitted by a supervisory authority, to the requesting supervisory authority;
- in the event that a data subject revokes his/her consent to the processing of his/her personal data, cease all processing of the data subject's personal data and destroy the data subject's personal data within thirty days from receipt of the revocation notice, unless otherwise agreed between the Operator and the data subject;
- provide personal data only to persons authorized to receive such personal data and only to the extent required for such persons to perform their employment obligations pursuant to this Policy and applicable laws of the Russian Federation.

## **2. Purposes of processing**

2.1. The Operator has determined and approved the following purposes of the processing of each category of personal data. No personal data shall be processed for purposes other than the approved purposes.

2.2. The Operator will process personal data for any of the following purposes:

- selection of job applicants for the Operator’s vacancies, assessment of an applicants’ suitability for vacancies, creation of a pool of candidates, and analysis of statistics in order to optimize the applicant selection process;
- human resource record management, performance of its obligations as employer under its job contracts with employees and in compliance with applicable laws of the Russian Federation, management of information collected in the course of employment relations as required by applicable laws of the Russian Federation, handling requests from public authorities and employees;
- enrollment of employees into a payroll card program and provision of employees with payroll cards;
- issuance of permanent pass cards to employees and issuance of temporary passes to visitors;
- preparation of documents required for business trips, booking tickets and hotels, booking taxi rides, and assistance in obtaining visas;
- issuance of powers of attorney;
- maintenance of accounting and tax records and preparation of original and payment documents;
- organization of employee training courses;
- enrollment of employees and their family members into private medical and accident insurance programs;
- sending of messages and e-mails, posting of notices on message boards, entry of employee information into ABBYY’s internal organization chart, maintenance of work time records;
- analysis, improvement, and assessment of ABBYY products;
- execution and performance of contracts and assessment of tax and other business-related risks;
- collection and analysis of statistics and metrics;
- execution and performance of contracts, assessment of tax risks;
- registration/authorization of persons opting to participate in the Operator’s campaigns, events, and projects or to use the Operator’s products or services;

2.3. Personal data shall be destroyed or depersonalized at the end of the allowed storage period or when the purposes of its processing are achieved or become unnecessary, unless otherwise provided by applicable laws.

### **3. Legal basis for the processing of personal data**

The processing of personal data falling under the categories indicated below shall be additionally performed in compliance with the provisions of the Tax Code of the Russian Federation, Federal Law No. 402-FZ “On Accounting,” Federal Law No. 125-FZ “On Archive Keeping in the Russian Federation,” Decree of the Russian Ministry of Culture No. 558 entitled “The Approved List of Standard Archived Management Documents Created by Public Authorities, Local Self-Government Bodies, and Organizations Accompanied by Their Storage Periods,” as well as other

regulations of the Russian Federation, and in compliance with the Operators functions, rights, and obligations under the laws of the Russian Federation.

3.1. The processing of personal data of job applicants is subject to consent from the respective data subjects and shall be in compliance with the Labor Code of the Russian Federation, Federal Law No. 1032-1 “On Employment in the Russian Federation” and agreements with recruiting agencies and websites that either contain data subjects’ consent to the processing of their personal data or establish another legal basis for the provision of personal data to the Operator.

3.2. The processing of personal data of employees is subject to consent from the respective data subjects and shall be in compliance with the labor, pension, tax, social care, and social insurance laws of the Russian Federation and any agreements to which the data subjects are parties and beneficiaries.

3.3. The processing of personal data of the employee’s family members shall be in compliance with the labor, tax, and social care laws of the Russian Federation.

3.4. The processing of personal data of former employees is subject to consent from the respective data subjects and shall be in compliance with the labor and archiving laws of the Russian Federation.

3.5. The processing of personal data of the Operator’s counterparties who are natural persons is subject to consent from the respective data subjects and shall be in compliance with the tax laws of the Russian Federation and any agreements to which the data subjects are parties and beneficiaries.

3.6. The processing of personal data of guests visiting the Operator’s premises is subject to consent from the respective data subjects.

3.7. The processing of personal data of representatives of the Operator’s counterparties is subject to consent from the respective data subjects and shall be in compliance with agreements with the respective counterparties that shall contain the legal basis for the provision of the personal data to the Operator.

#### **4. Categories and scope of personal data; categories of data subjects**

4.1. The Operator will process personal data of the following categories of data subjects:

- job applicants and members of the pool of candidates
- employees
- family members of employees
- former employees
- family members of former employees
- counterparties who are natural persons
- representatives of counterparties
- guests visiting the Operator’s premises

#### 4.2. Personal data of job applicants and members of the pool of candidates:

- last name, first name, and patronymic
- gender
- date of birth
- residential address
- photo
- information about previous employment (start date, end date, employer, city, job position)
- years of employment
- key qualifications
- whether or not the applicant or pool member has a driver's license
- education (education tier, name of college or other institution, year of graduation, qualifications as stated in the diploma, area of study and profession as stated in the diploma)
- further education and refresher courses (start date, end date, type of course, name of college or other institution)
- occupational retraining courses (start date, end date, profession)
- fluency in foreign languages
- computer and software skills
- citizenship
- phone number
- e-mail address
- military service details
- marital status

#### 4.3. Personal data of employees:

- last name, first name, and patronymic
- first name and last name in English characters
- surname at birth
- identification document details (name of ID document, its series, number, issue date, and issuing authority)
- employee code
- individual taxpayer number
- personal insurance policy number
- photo
- gender

- type of employment (full-time, part-time, or remote)
- date of birth
- place of birth
- citizenship
- citizenship at birth
- fluency in foreign languages
- education (education tier, name of college or other institution, year of graduation, qualifications as stated in the diploma, area of study and profession as stated in the diploma)
- years of employment (overall, continuous, whether employee is entitled to long-service pay)
- marital status
- family members and dependents
- residential address
- registration address
- phone number
- military service details (military reserve category, military rank, military profile, military occupational specialty, fitness for military service)
- information about the start of employment and change of position
- department
- position
- area of expertise
- profession
- performance assessment
- salary
- bonuses, benefits, compensation
- rank, class/category, skill level
- further education and refresher courses (start date, end date, type of course, name of college or other institution, certificate details (certificate name, series, number, and date))
- occupational retraining courses (start date, end date, profession, certificate details (certificate name, series, number, and date))
- rewards
- honorary titles
- international passport details
- vacation (type of vacation, period of employment, vacation duration in calendar days, and vacation start and end dates)

- social benefits (name of benefit and date and number of supporting document)
- reference number and date of employment contract
- information about business trips (date, destination, duration, purpose, financed by, and job assignment)
- work sheet data (clock-in and clock-out times, absence)
- bank details
- health exclusions
- disability information

4.4. Personal data of family members of employees:

- last name, first name, and patronymic
- first name and last name in English characters
- familial relationship
- date of birth
- residential address
- phone number
- copy of spouse's employment record (employer, position, employment start date)

4.5. Personal data of former employees include:

- last name, first name, and patronymic
- employee code
- individual tax payer number
- personal insurance policy number
- photo
- gender
- type of employment (full-time or part-time)
- date of birth
- place of birth
- citizenship
- fluency in foreign languages
- education (education tier, name of college or other institution, year of graduation, qualifications as stated in the diploma, series and number of the diploma, special knowledge and skills, area of study and profession as stated in the diploma)
- duration and continuity of employment (overall, continuous, entitlement to long-service pay)
- marital status



- family members and dependents
- identification document details (name of ID document, its series, number, issue date, and issuing authority)
- residential address
- registration address
- cell phone number
- home phone number
- military service details (military reserve category, military rank, military profile, military occupational specialty, fitness for military service)
- information about the start of employment and change of position
- department
- position
- area of expertise
- profession
- performance assessment
- salary
- bonuses, benefits, compensation
- further education and refresher courses (start date, end date, type of course, name of college or other institution, certificate details (certificate name, series, number, and date))
- occupational retraining courses (start date, end date, profession, certificate details (certificate name, series, number, and date))
- rewards
- honorary titles
- vacation (type of vacation, period of employment, vacation duration in calendar days, and vacation start and end dates)
- social benefits (name of benefit, date and number of supporting document)
- grounds for termination of employment
- termination date
- reference number and date of employment contract
- information about business trips (date, destination, duration, purpose, financed by, and job assignment)
- work sheet data (clock-in and clock-out times, absence)
- incapacity to work
- health exclusions
- disability information

#### 4.6. Personal data of family members of former employees:

- last name, first name, and patronymic
- first name and last name in English characters
- familial relationship
- date of birth
- residential address
- phone number
- copy of spouse's employment record (employer, position, employment start date)

4.7. Personal data of counterparties who are natural persons:

- last name, first name, and patronymic
- identification document details (name of ID document, its series, number, issue date, and issuing authority)
- personal insurance policy number
- individual taxpayer number
- financial information
- residential address
- registration address
- e-mail address
- phone number
- vehicle registration details

4.8. Personal data of representatives of counterparties:

- last name, first name, and patronymic
- employer
- position

4.9. Personal data of guests visiting the Operator's premises:

- last name, first name, and patronymic
- vehicle registration details

## **5. Procedure and conditions for the processing of personal data**

5.1. The Operator shall receive all personal data directly from data subjects, from representatives of data subjects, or from person on whose behalf the Operator will process personal data, unless otherwise provided by the laws of the Russian Federation.

5.2. The processing of personal data is subject to consent from the data subject, unless otherwise provided by the laws of the Russian Federation. Such consent may be expressed in various

forms allowing for its confirmation, including by implicative action, in a separate written statement, or in any another document duly signed by the data subject. Such consent may also be given by a representative of the data subject, provided that the representative produces sufficient evidence that he/she is authorized to give such consent on behalf of the data subject.

5.3. A data subject may revoke his/her consent to the processing of his/her personal data. Where allowed by applicable laws of the Russian Federation, the processing of personal data may continue even after the consent has been revoked by the data subject.

5.4. In making decisions affecting the interests of a data subject, the Operator shall never rely on the data subject's personal data obtained exclusively through automated processing or electronic communications.

5.5. Personal data shall not be used for purposes resulting in material and/or moral damage or to prevent citizens of the Russian Federation from enjoying their rights and freedoms.

5.6. Personal data shall only be accessed by the Operator's employees on a need-to-know basis.

5.7. No personal data of the Operator's employees shall be provided to third-parties without consent from the personal data subjects, unless otherwise provided by applicable laws of the Russian Federation.

5.8. The Operator may provide personal data to investigative bodies and other competent authorities in compliance with applicable laws of the Russian Federation.

5.9. The Operator may create publicly accessible sources of personal data and include personal data in such data sources upon obtaining written consent from the data subjects.

5.10. The operator will not provide personal data for commercial purposes without the written consent of data subjects.

5.11. In the event that the Operator needs to provide personal data to a third party, the Operator shall enter into a confidentiality agreement with said third party, unless otherwise provided by applicable laws of the Russian Federation.

5.12. Personal data may be processed with or without the use of computers.

5.13. The time periods during which the Operator is allowed to process personal data are set forth in Russian Federal Law No. 152-FZ "On Personal Data" and will also depend on the term of the corresponding agreement, the time periods specified in the instruction to process personal data, the term of the documents listed in the Decree of the Russian Archive issued October 6, 2000 and entitled "The List of Standard Management Documents Created Organizations and Their Storage Periods," the Decree of the Russian Ministry of Culture No. 558 issued August 5, 2010 and entitled "The Approved List of Standard Archived Management Documents Created by Public Authorities, Local Self-Government Bodies, and Organizations Accompanied by Their Storage Periods," the applicable statutory time limits on legal action, the term of the data subject's consent, and by other provisions of applicable laws of the Russian Federation.

5.14. Any personal data processed without the use of automated means shall be kept separately, including by recording such personal data on a separate tangible medium used for the storage of personal data (hereinafter, "tangible medium"), in special sections of forms, or in the margins of forms.

5.15. In the event that personal data is recorded on a tangible medium, said tangible medium shall not contain any personal data whose processing purposes are known to be

incompatible with the processing purposes of other data recorded on the same medium. Where personal data is processed without the use of automated means, a separate tangible medium shall be used for the processing of each category of personal data.

5.16. Any persons involved in the processing of personal data without the use of automated means shall be notified of the fact of such processing, the categories of personal data that are being processed, the specifics of such processing, and rules regulating such processing.

5.17. Where data subjects manually fill out a standard form that requires or allows the provision of personal data (hereinafter, “standard form”), the following conditions shall be met:

- The standard form or its associated documents, such as fill-out instructions, cards, registries or logs, shall state the purposes of the processing of the personal data without the use of automated means, the name and address of the operator, the full name and address of the data subject, the period of processing, the operations which will be performed on the personal data in the course of processing, and a general description of the processing methods employed by the Operator.
- The standard form shall include a field where the data subject may place a mark to indicate his/her consent to the processing of his/her personal data without the use of automated means (where the data subject’s written consent is required).
- The standard form shall be designed in a manner allowing each data subject listed in the standard form to review his/her personal data contained in the standard form without violating the rights or legitimate interests of other data subjects.
- The standard form shall not allow collation of any fields containing personal data whose processing purposes are known to be incompatible.

5.18. Personal data shall be destroyed within thirty days of achieving the purposes of its processing, when the purposes of its processing become unnecessary, upon expiration of its storage period, if its processing is found to be unlawful, upon instruction to cease its processing from the person that earlier requested its processing, or upon revocation of the data subject’s consent to the processing of the personal data. The destruction shall be supervised by a committee, which will sign a statement certifying the destruction of the personal data.

## **6. Protection of personal data**

6.1. The Operator shall protect personal data from unlawful or accidental access, destruction, alteration, restriction, copying, or dissemination and from other unlawful activities.

6.2. The Operator shall protect personal data in compliance with the procedures established by applicable laws of the Russian Federation and the Operator’s internal regulations. Further, the Operator shall implement organizational and technical protections to ensure the security of personal data.

6.3. All the security measures implemented for the collection, processing, storage, and transfer of personal data shall apply both to paper and digital (automated) storage media.

## **7. Updating, correction, and destruction of personal data**

7.1. The Operator may update, alter, restrict or destroy personal data in compliance with applicable laws of the Russian Federation.

7.2. Upon a data subject’s request, the Operator shall:

- inform the data subject whether the Operator is in possession of any of the data subject's personal data;
- enable the data subject to review his/her personal data (to the extent that such review is not expressly prohibited by part 5, article 14 of Federal Law No. FZ-152);
- correct any personal data of the data subject that is deemed to be inaccurate or out of date;
- restrict or destroy any personal data of the data subject that is deemed to be unlawfully obtained, that is not necessary for the declared purpose of processing, or for the processing of which the data subject has revoked his/her consent.

7.3. A data subject shall submit his/her request to the Operator in hard copy format, stating the number of the primary identity document of the data subject or its authorized representative, its date of issue and issuing body. Such hard copy request shall be manually signed by the data subject or by his/her authorized representative. The standard request form is attached as Appendix 1 to this Policy.

7.4. A data subject may submit his/her request to the Operator in a digital format, provided the request is signed by the data subject with his/her digital signature in compliance with applicable laws of the Russian Federation. Digital requests shall be sent to the following e-mail address of the Operator: **HR@abbyy.ru, sales@abbyy.ru**

7.5. The Operator's employees tasked with handling requests from data subjects shall record all incoming requests in the Operator's registry of data subject requests.

7.6. The Operator shall grant or reject a data subject's request within 10 days from receipt of the request. If the Operator rejects a request, the Operator shall notify the data subject of the grounds for such rejection. The Operator's reply to a data subject's request shall contain complete and accurate information as regards the subject matter of the request.

## **8. Changes to this Policy**

8.1. The Operator may modify this Policy at any time. In the event the Operator makes any modifications to the text of this Policy, the operator shall state the date when this Policy was last modified. A modified version of this Policy shall become effective upon its publication on the Operator's website, unless otherwise expressly stated in the modified version of this Policy.

8.2. The current printed version of this Policy is kept in the offices of the Operator's executive body at 127273 Moscow, ul. Otradnaya, d. 2B, str. 6, room 12. The electronic version of this Policy is available on the Operator's website at <https://www.abbyy.com/ru-ru/privacy/>.

8.3. This Policy and relations with data subjects shall be governed by applicable laws of the Russian Federation.

## **9. Contacts**

9.1. E-mail address: [Office@abbyy.ru](mailto:Office@abbyy.ru)

9.2. Mail: 127273, Moscow, Otradnaya st. house 2B, building 6, office 14.

Request for Information Related to the Processing of Personal Data

\_\_\_\_\_  
(job title of organization's head)

\_\_\_\_\_  
(name of organization)

\_\_\_\_\_  
(name of organization's head)

**Request for Information Related to the Processing of Personal Data**

Pursuant to the provisions of Federal Law No. 152-FZ "On Personal Data" adopted July 27, 2006, I,  
\_\_\_\_\_

\_\_\_\_\_  
(first name, patronymic, last name)

born \_\_\_\_\_, passport series \_\_\_\_\_ number \_\_\_\_\_

issued by \_\_\_\_\_

mailing address: \_\_\_\_\_

have the following reasons to believe that my personal data is being processed by ABBYY  
PRODUCTION LLC:

\_\_\_\_\_  
(facts confirming processing of data subject's personal data)

I therefore request the following:

\_\_\_\_\_  
(text of request)

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Date: \_\_\_\_\_

Signature: \_\_\_\_\_