Mallenom Technologies LLC PRIVACY POLICY

Effective as of August 18, 2021.

This Privacy Policy provides for terms and conditions under which Mallenom Technologies LLC, further referred to as the Company, a legal entity registered and operating at Skolkovo Innovation Center, 7 Nobel st., Moscow, 121205, Russia, processes personal data.

The Company ensures:

- 1. High level of protection of personal data
- 2. Lawfulness, fairness, and transparency of processing
- 3. Accuracy of data
- 4. Security of processing
- 5. Keeping data no longer than is necessary for the purposes of collection
- 6. Adequate, relevant, and limited to what is the necessary scope of data
- 7. The principles of purpose specification and purpose limitation are followed

The Company may act as the data controller while processing personal data for the purposes described herein, as well as be engaged as a data processor by its counterparties based on agreements with them. For any matters on this Privacy Policy, please contact the following address: info@mallenom-tech.ru

Types of collected information

The Company may collect the following information:

- -name and family name, job title, and information concerning person's organization;
- -contact details, including phone number, e-mail address, social media/messaging service (Skype, WhatsApp, etc.) accounts, and numbers;
- business correspondence with the Company, and/or for purposes of contract execution.

The Company will use personal data for the purpose it was collected this may include the following purposes:

- to perform the services under Company's contracts with clients, vendors, employees;
- to increase the quality of provided services;
- to expand the level of the Company's employees protection;
- to protect Company's potential and current clients in their experience with Mallenom Technologies LLC cooperation and to keep records for the future cooperation on the same basis;

- to safeguard Company's current vendor's records and personal information;
- to provide needed information to the regulatory authorities in cases where it is required by law;
- in case of receiving unambiguous, freely-given and explicit consent to send a promotional email, presentations, service proposals, special offers, newsletters, business initiatives, and an invitation to the Company's online study projects and webinars;

No automated decision-making activities (profiling, etc.) are being carried out by Mallenom Technologies LLC. The Company does not use any source of the personal data other than information provided by the data subject directly or made available to the public or obtained from the public domain. Additionally, personal data that were lawfully, fairly, and in a transparent manner collected may also be processed by the following processors: Company's affiliates, as well as partner firms engaged in joint or partnership activities with Mallenom Technologies LLC (exclusively necessary for the performance of activities needed to conduct services under the Contract, moreover third Parties to which personal data will be provided are specifically mentioned in the Contract with all necessary details); Mallenom Technologies LLC accounting, HR, Legal, IT departments acting on the basis of internal Privacy Policy. Personal data may be transferred to third parties mentioned above, which are located outside the European Union that is why Mallenom Technologies LLC adopts all necessary safeguards to ensure the safety of personal data (including usage of Standard Contractual Clauses as set forth by EU Commission, implementation of technical and organizational security measures).

Data Subject Rights

Data Subject has the following rights regarding its personal data:

- right of access which means the right to know whether data is being processed and to access it;
- right to rectification through providing a supplementary statement about missing, incomplete or incorrect information;
- right to erasure or right to be forgotten, among others if personal data has been made public;
- right to require the restriction of processing in cases provided by law;
- right to data portability;
- right to object to a personal data processing to be done or going on;
- right to withdraw consent for personal data processing;
- all rights that are guaranteed by applicable legislation. The following email is created for personal data issues communication: info@mallenom-tech.ru

Personal Data Retention Period

The personal data will be retained for 5 years after the last contract, or after the Company achieved the results for which that data was collected, or unless the Company has received a

request for the erasure of personal data or their restrictions of processing in place, or other cases required by the applicable law.

The data subject has the right to view, amend, or delete the personal information concerning him or her.

Rectification of personal information

In case any of the information which Company holds on the data subject is inaccurate or incomplete, that data subject may ask Company to correct or complete it at any time.

Right of erasure, or to be forgotten

The data subject may request the deletion of any personal data which the Company holds at any time. Be aware that requesting deletion, unlike unsubscribing from specific emails, is resulting in a full erasure from the Company's systems. In the situation where the data subject re-joins Company systems, that data subject will appear as a completely new data subject. This does not affect other data subject's rights in any way. To request deletion of personal information, please contact info@mallenom-tech.ru

Cookie Policy

Cookies are very small text files that are stored on visitor's computers when they visit a website. Website servers set cookies to help authenticate the user if the user logs in to a secure area of the website. Login information is stored in a cookie, so the user can enter and leave the website without having to re-enter the same authentication information over and over. Any visitor can choose to accept, decline, or manage to "only necessary" or preferred cookies. Most browsers automatically accept cookies, but the visitors can usually modify their browser settings to decline cookies if preferred. This Website uses Google Analytics cookies to monitor traffic levels, search queries, and visits website, namely: "_ ga" cookie for user identification. Visitors of this website could also manage their cookie preferences by editing used browser and Google settings. To have more information regarding cookies and how do they work, please visit the following link

https://policies.google.com/technologies/cookies?hl=en-US.

Changes to this Privacy Policy Mallenom Technologies LLC may be added to this Policy from time to time by updating this page with simultaneous indication of the date of update. This policy is effective from August 18, 2021.