

PERSONAL DATA PROCESSING POLICY

1. General Provisions

This Personal Data Processing Policy has been developed in accordance with the requirements of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" (hereinafter — the "Law") and defines the procedure for processing personal data and the measures taken to ensure the security of personal data by Agentic Lab LLC, OGRN 1257700237080 (hereinafter — the "Operator", the "Company").

The Policy applies to personal data that the Operator receives from data subjects, including through the website agenticlab.tech (hereinafter — the "Website") and through the application form on the Website.

The key terms used in this Policy correspond to the definitions established in Article 3 of the Law. Personal data in this Policy are hereinafter referred to as "PD".

Operator details:

- Full name: Limited Liability Company "Agentic Lab"
- Abbreviated name: Agentic Lab LLC
- Website: <https://agenticlab.tech>
- Email for inquiries: founders@agenticlab.tech

The Operator has the right to:

- Independently determine the composition and list of measures necessary and sufficient to ensure compliance with the obligations provided for by the Law and the regulatory legal acts adopted in accordance with it, unless otherwise provided by the Law or other federal laws;
- Entrust the processing of PD to another party with the consent of the PD subject, unless otherwise provided by the Law, on the basis of a contract concluded with such party. The party processing PD on behalf of the Operator is obliged to comply with the principles and rules of processing and confidentiality of PD provided for by the Law, and to take the necessary measures aimed at ensuring compliance with the obligations provided for by the Law;
- In the event that the PD subject withdraws consent to the processing of PD, the Operator may continue processing PD without the consent of the PD subject if there are grounds specified in the Law.

The Operator is obliged to:

- Organize the processing of PD in accordance with the requirements of the Law;
- Respond to requests and inquiries of PD subjects and their legal representatives in accordance with the requirements of the Law;
- Report to the authorized body for the protection of the rights of PD subjects (Roskomnadzor) upon request of that body the necessary information within 10 business days from the date of receipt of such a request;
- In the manner determined by the federal executive body authorized in the field of security, ensure interaction with the state system for detection, prevention and elimination of consequences of computer attacks on information resources of the Russian Federation, including informing it about computer incidents that resulted in unlawful transfer (provision, distribution, access) of PD.

The PD subject has the right to:

- Receive information concerning the processing of their PD, except in cases provided for by federal laws. Information is provided to the PD subject by the Operator in an accessible form and must not contain PD relating to other PD subjects, except in cases where there are legal grounds for disclosing such PD. The list of information and the procedure for its receipt are established by the Law;
- Require the Operator to clarify their PD, block or destroy it if the PD is incomplete, outdated, inaccurate, unlawfully obtained, or not necessary for the stated purpose of processing, and also to take measures provided by law to protect their rights;
- Give prior consent to the processing of PD for the purposes of promoting goods, works, and services on the market;
- Appeal to Roskomnadzor or in court against unlawful actions or inaction of the Operator in processing their PD.

2. Legal Grounds for Processing PD by the Operator

The Operator processes PD only if at least one of the following lawful grounds exists:

- Existence of consent of the PD subject (executed in accordance with the requirements of the Law);
- Conclusion or performance of a contract to which the PD subject is a party (beneficiary or guarantor);
- The need to comply with the requirements of federal laws and other regulatory legal acts imposing obligations on the Operator to process PD;
- The need to exercise the rights and legitimate interests of the Operator or third parties;
- Processing of PD subject to publication or mandatory disclosure in accordance with the law;
- Processing of PD made publicly available by the PD subject;
- Other grounds provided for in Article 6 of the Law.

In the application form on the Website, consent to PD processing is expressed by checking the box "I agree to the processing of personal data". Without checking this box, processing of the application is not possible.

By checking the box "I agree to receive newsletters", the PD subject expresses their voluntary, specific, informed, and conscious consent to the Operator sending them informational and commercial messages on the terms specified in the Policy.

Cookie files, IP address, device data and behavior on the Website (hereinafter — "technical data") are processed by the Operator (including with the involvement of third parties) for the purposes of ensuring the Website's functionality, collecting traffic statistics, analyzing user behavior and improving the quality of the Website.

The legal basis for processing technical data is:

- For technically necessary cookies (ensuring the operation of the Website) — the Operator's legitimate interest in ensuring the Website's operability (clause 2, part 1, article 6 of the Law);
- For analytical and other optional cookies — user consent expressed by active actions in the cookie banner interface upon the first visit to the Website (clause 1, part 1, article 6 of the Law).

Detailed terms of cookie use, including the procedure for exercising the rights of the PD subject (opting out of cookies) and information on third parties engaged, are set out in Section 5.

3. List of Processed PD, Categories of PD Subjects and Purposes of Processing

The list of purposes, composition and retention periods of PD broken down by categories of subjects is provided in Annex 1.

The Operator does not collect special categories of PD (racial or ethnic origin, political views, religious or philosophical beliefs, state of health, intimate life) and does not process biometric PD.

4. Procedure and Conditions for Processing PD

PD is processed in compliance with the principles and rules provided for by the Law (including Article 5 of the Law).

PD is processed with the consent of PD subjects to the processing of their PD, as well as without such consent in cases provided for by the legislation of the Russian Federation.

PD is processed for each purpose of its processing both with and without the use of automation tools, including by a combined method.

Only employees of the Operator whose job duties include the processing of PD are permitted to process PD.

The Operator takes the necessary legal, organizational and technical measures to protect PD from unlawful or accidental access, destruction, modification, blocking, copying, provision, distribution, and other unlawful actions. In particular:

- A person responsible for organizing the processing of PD has been appointed;
- Internal regulations and policies in the field of PD have been introduced;
- Data encryption during network transmission (HTTPS) is applied;
- Access to PD is restricted on a need-to-know basis;
- Measures are taken to assess the damage that may be caused to PD subjects;
- The effectiveness of the measures taken to ensure PD security is monitored;
- Yandex.Metrica configuration: IP anonymization is enabled, "User data prohibited" mode is set.

PD is not sold or transferred to third parties without the consent of the subject, except for the transfer of information about Website users to the following parties:

Processing Purpose	Third Party, Location and Privacy Policy / Website Link	Purpose and Scope of Transfer	Third Party Address
Web analytics collection	Yandex LLC Privacy Policy: https://yandex.ru/legal/confidential/ Metrica Terms of Use: https://yandex.ru/legal/metrica_termsofuse/	Web analytics service provider (Yandex.Metrica). Transferred: anonymized IP, cookies, technical device data for analytics.	119021, Moscow, 16 Lva Tolstogo St.

PD is transferred to inquiry and investigation bodies, the Federal Tax Service, the Social Fund of Russia and other authorized executive bodies and organizations in accordance with the requirements of the legislation of the Russian Federation.

When transferring PD, the Operator warns the persons receiving PD of the need to maintain confidentiality.

PD is processed and stored on servers located in the Russian Federation, in accordance with the requirements of Article 18 of the Law.

The Operator stores PD in a form that makes it possible to identify the PD subject for no longer than is required by each purpose of PD processing, unless the PD retention period is established by federal law or contract.

The Operator ceases to process PD in the following cases:

- Unlawful processing is detected — within 3 business days from the date of detection;
- The purpose of processing has been achieved;
- The PD subject's consent has expired or been withdrawn, when processing of such data is permitted only with consent under the Law.

Upon achieving the purposes of processing PD, as well as in the event of withdrawal of the PD subject's consent to their processing, the Operator ceases to process such data within the periods established by the Policy. The provisions of this clause do not apply if a contract has been concluded between the Operator and the subject providing for further storage of data, or if the obligation for further data processing is imposed on the Operator by the legislation of the Russian Federation.

Upon a request from the PD subject to cease processing PD, processing is stopped within no more than 10 business days from the date the Operator receives such a request, except in cases provided for by the Law. This period may be extended, but by no more than 5 business days. To do so, the Operator must send the PD subject a reasoned notice indicating the reasons for the extension.

Upon achieving the purposes of processing or expiration of the established retention periods, PD is destroyed or anonymized.

5. Use of Cookie Files and Analytical Tools

The Website uses cookies and similar technologies to ensure proper operation, improve user experience and collect traffic statistics.

To collect and process statistical information about Website traffic, the Operator uses the Yandex.Metrica web analytics service provided by Yandex LLC (OGRN 1027700229193, address: 119021, Moscow, 16 Lva Tolstogo St.).

Anonymized technical data is transferred to Yandex.Metrica on the Operator's instructions. The relationship with Yandex is governed by the Yandex.Metrica Terms of Use (https://yandex.ru/legal/metrica_termsofuse/) and the Yandex Privacy Policy (<https://yandex.ru/legal/confidential/>). Yandex undertakes to ensure confidentiality and security of the received data during its processing.

The user may opt out of technical data collection in any of the following ways:

- By selecting the appropriate settings in the cookie banner upon the first visit to the Website;
- By changing the cookie settings in their browser;
- Using the opt-out tools provided by Yandex (<https://yandex.ru/support/metrica/general/opt-out.html>).

Opting out of cookies may result in limited Website functionality.

6. Updating, Correcting, Deleting and Destroying PD; Responding to Data Access Requests

6.1. Procedure for Interacting with PD Subjects

Confirmation of the fact of PD processing by the Operator, legal grounds and purposes of PD processing, as well as other information specified in Part 7, Article 14 of the Law, are provided by the Operator to the PD subject or their representative within 10 business days from the moment of appeal or receipt of a request from the PD subject or their representative.

This period may be extended, but by no more than 5 days. To do so, the Operator must send the PD subject a reasoned notice indicating the reasons for the extension of the period for providing the requested information.

The Operator provides the information specified in Part 7, Article 14 of the Law to the PD subject or their representative in the form in which the corresponding appeal or request was submitted, unless otherwise indicated in the appeal or request.

The information provided does not include PD relating to other PD subjects, except in cases where there are legal grounds for disclosing such PD.

If the appeal (request) of the PD subject does not contain all the necessary information as required by the Law, or the subject does not have access rights to the requested information, a reasoned refusal is sent to them.

The right of the PD subject to access their PD may be restricted in accordance with Part 8, Article 14 of the Law, including if the PD subject's access to their PD violates the rights and legitimate interests of third parties.

6.2. Requirements for the Form of a Request

A request must contain:

- The number of the main identity document of the PD subject or their representative, information about the date of issue of the specified document and the issuing authority;
- Information confirming the PD subject's participation in relations with the Operator (contract number, date of contract conclusion and/or other information), or information otherwise confirming the fact of PD processing by the Operator;
- Signature of the PD subject or their representative.

A request may be submitted in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

6.3. Procedure for Handling Inaccurate or Unlawfully Processed Data

In the event that inaccurate PD is identified upon an appeal by the PD subject or their representative, or upon their request or a request from Roskomnadzor, the Operator:

- Blocks the relevant PD for the period of verification;
- If the inaccuracy is confirmed — clarifies the PD within 7 business days from the date of submission of the necessary information and unblocks it.

In the event of unlawful PD processing being identified (upon an appeal by the subject, their representative, or upon a request from Roskomnadzor), the Operator blocks the unlawfully processed PD from the moment of such appeal or receipt of the request.

6.4. Conditions and Deadlines for Destruction of PD

PD is subject to destruction in the following cases and within the following timeframes:

Grounds for Destruction	Destruction Deadline
Achievement of the purpose of PD processing or loss of necessity to achieve such purpose	Within 30 days
Reaching the maximum retention periods for documents containing PD	Within 30 days
Confirmation by the subject (or their representative) that the data was obtained unlawfully or is not necessary for the stated processing purpose	Within 7 business days
Withdrawal of the PD subject's consent to processing	Within 30 days from the date of receipt of the withdrawal

PD is not destroyed if:

- This is not provided for by the contract to which the subject is a party (beneficiary or guarantor);
- The Operator is entitled to process them without the subject's consent on the grounds provided for by the Law or other federal laws.

PD is destroyed by a commission established by order of the Operator's General Director. The methods of PD destruction are established in the Operator's local regulatory acts.

7. Final Provisions

The Policy enters into force from the moment of its approval and is valid indefinitely, until a new version is adopted.

The Operator may amend the Policy. A new version of the Policy enters into force from the moment of its publication on the Website, unless otherwise provided by the new version.

The Policy is governed and interpreted in accordance with the legislation of the Russian Federation.

In the event of any disagreements or disputes arising in connection with the implementation of the Policy, the PD subject and the Operator undertake to resolve them through negotiations. If no agreement is reached, disputes are resolved in court at the Operator's location.

The Policy is a public document. The current version of the Policy is available on the Website at: <https://agenticlab.tech/ru>.

Annex 1

to the Personal Data Processing Policy of Agentic Lab LLC

Purposes, Composition of PD and Retention Periods in the Company

Data Subject Category	PD Content	Processing Purposes	Retention Periods
Employees	<ul style="list-style-type: none"> • Full name; • Place, year and date of birth; • Gender; 	<ul style="list-style-type: none"> • Fulfillment of employment relations with the Company, personnel 	For the duration of the employment contract and

	<ul style="list-style-type: none"> • Passport data; • Registration address; • Actual residence address; • Education information; • Marital status and family composition; • Employment history information; • Pre-employment work history (places of employment); • Military registration data; • Criminal record data; • State/non-state pension insurance information; • Tax ID certificate data (INN); • Phone number; • Email; • Social benefits data; • Specialty, profession; • Job title; • Salary/remuneration amount; • Cardholder account number; • Employment contract details; • Foreign language knowledge; • Vacation information; • Hiring, transfer, dismissal records; • Awards, medals, commendations, honorary titles; • Training, retraining, certification records; • Internal investigation records; • Employee photographs; • Other data that may be used to identify the individual (based on the Company's current business processes). 	<p>management, HR record-keeping;</p> <ul style="list-style-type: none"> • Organization of accounting and tax reporting; • Granting access to information systems; • Voluntary medical insurance; • Compliance with laws and other regulatory legal acts of the Russian Federation; • Confirmation of employee's compliance with their position; • Ensuring the personal safety of employees and the Company's security; • Preparation of reference materials for internal information support of the Company's activities; • Fulfillment of requests from authorized state and municipal bodies, including law enforcement bodies, as well as PD subjects; • Other lawful purposes. 	<p>thereafter 50 years from the date of the employee's dismissal (Federal Law No. 125-FZ of 22.10.2004 "On Archival Affairs in the Russian Federation", Order of the Federal Archival Agency No. 236 of 20.12.2019)</p>
Job Applicants	<ul style="list-style-type: none"> • Full name; • Place, year and date of birth; • Gender; • Registration address; • Actual residence address; • IP address; • Cookies; • Education information; • Marital status and family composition; • Employment history information; 	<ul style="list-style-type: none"> • Processing of employment inquiries; • Communication with the PD subject in the context of responding to their request or employment offer; • Personnel management, talent pool record-keeping; • Confirmation of the applicant's compliance with the requirements of the position they are applying for; 	<p>3 years (for personnel management purposes, talent pool record-keeping, subject to obtaining consent); until processing purposes are achieved or consent is withdrawn.</p>

	<ul style="list-style-type: none"> • Work activity information; • Military registration data; • Criminal record data; • State/non-state pension insurance information; • Tax ID certificate data (INN); • Phone number; • Email; • Specialty, profession; • Foreign language knowledge; • Awards, medals, commendations, honorary titles; • Training, retraining, certification records. 	<ul style="list-style-type: none"> • Ensuring the Company's security; • Preparation of reference materials for internal information support of the Company's activities. 	
Counterparties and Potential Counterparties	<p>Counterparty or potential counterparty — an individual, or a representative of a counterparty (potential counterparty) — a legal entity or unincorporated structure:</p> <ul style="list-style-type: none"> • Full name; • Place, year and date of birth; • Passport data; • Phone; • Email; • Registration address; • Actual residence address; • IP address; • Cookies; • Criminal record data; • State/non-state pension insurance information; • Tax ID certificate data (INN); • Specialty, profession; • Salary/remuneration amount. <p>If the contract provides for transfer of the counterparty representative's PD:</p> <ul style="list-style-type: none"> • Full name; • Phone number; • Job title; • Other data that may be used to identify the individual. 	<ul style="list-style-type: none"> • Processing of inquiries and applications; • Communication with the PD subject in the context of responding to their request, offer to conclude contracts; • Due diligence checks; • Assessment of risks related to proper performance of the proposed and concluded contract; • Engagement of individuals to perform work/provide services under a civil law contract; • Organization of accounting and tax reporting; • Preparation of reference materials for internal information support of the Company's activities. 	<p>For potential counterparties or their representatives: until processing purposes are achieved or consent is withdrawn.</p> <p>For counterparties and their representatives: for the duration of the contract and 5 years after the end of the reporting year in which it was performed or terminated (Articles 23, 24, 113 of the Tax Code of the Russian Federation; Article 29 of Federal Law No. 402-FZ "On Accounting").</p>
Website Users	<ul style="list-style-type: none"> • Full name; • Phone number; • Email. 	<ul style="list-style-type: none"> • Processing of inquiries and applications submitted through the Website application form; 	<p>Until the processing purpose is achieved or until the PD subject</p>

		<ul style="list-style-type: none"> • Communication with the User in the context of responding to their request; • Sending informational and commercial messages. 	withdraws consent (whichever comes first).
Website Users (technical data)	<ul style="list-style-type: none"> • IP address, cookie data, browser and device identifiers, behavioral data on the Website (page views, clicks). 	<ul style="list-style-type: none"> • Web analytics, traffic statistics, Website improvement. 	Duration of the Website User's session or for the duration of Yandex cookies (see Yandex.Metrica website for details).