

Privacy and personal data protection policy

This Privacy and Personal Data Protection Policy (“**Policy**”) is addressed to all persons whose personal data, as defined by applicable law, may be collected by Denuo LLC and/or its affiliates, including entities of the same group as Denuo LLC (jointly, “**Denuo**”) in the course of:

- the use by such persons of Denuo’s official website <https://denuo.legal/> (“**Website**”) or programs, pages (channels) in social networks and messengers, services or other online products provided by Denuo (“**Resource**”);
- the provision of consulting services or the performance of any agreements or contracts with Denuo; or
- other interaction that may result in Denuo receiving information that contains personal data.

This Policy is developed in accordance with the provisions of Federal Law No. 152-FZ “On Personal Data” dated 27 July 2006, as well as other regulations governing personal data security requirements and procedures.

Terms used in this policy

The following terms are used in this Policy:

Personal Data Automated Processing means the processing of personal data by means of computer technology.

Personal Data Blocking means the temporary suspension of personal data processing (except when the processing is necessary to clarify personal data).

Access to Personal Data means the ability of a person to obtain personal data and use it.

Denuo means Denuo LLC (OGRN (Principal State Registration Number) 1227700120867, INN (Taxpayer Identification Number) 9710096279, address: room 20, floor 4, 25 Leontievsky pereulok, Moscow, 125375, Russian Federation).

Personal Data Information System means a set of personal data contained in databases of personal data and information technologies and technical means ensuring their processing.

Personal Data Depersonalisation means actions, as a result of which it becomes impossible, without the use of additional information, to determine the particular data subject to whom personal data refers.

Personal Data Processing means any action (operation) or a set of actions (operations) performed with or without the use of automated means with personal data, including collection, recording, systematisation, accumulation, storage, clarification (updating, change), extraction, use, transfer (distribution, provision, access), depersonalisation, blocking, removal, destruction of personal data.

Operator means a state body, municipal authority, legal entity or individual, independently or together with other persons, arranging and/or performing the processing of personal data, as well as determining the purpose of personal data processing, the composition of personal data to be processed, and actions (operations) performed with personal data.

For the purposes of this Policy, Denuo is the operator of personal data, i.e. it processes personal data and determines the purposes of their processing, the composition and actions performed with personal data.

Personal Data Dissemination means actions aimed at disclosure of personal data to an indefinite group of people.

Resource means programs, pages (channels) in social networks and messengers, services and other products on the Internet provided to Denuo.

Personal Data means any information related directly or indirectly to a specific or identifiable individual (the subject of personal data) that is a user of the Website or the Resource, which directly or indirectly can identify such user (in particular, name, surname, patronymic (if any), age, gender, contact and other data (if provided

to Denuo). Personal data may also include other information such as IP address, commercial or personal preferences, interests, etc.

User means an individual (subject of personal data) who uses the Website or the Resource.

Personal Data Provision means actions aimed at disclosure of personal data to a certain person or a certain group of people.

Website means <https://denuo.legal/>

Data Subject means an individual to whom personal data refers and who is directly or indirectly identified through such data.

Personal Data Destruction means actions that make it impossible to recover the content of personal data, including the destruction of physical carriers of personal data.

FZ-152 means Federal Law No. 152-FZ "On Personal Data" dated 27 July 2006.

Policy validity

Preserving the confidentiality of the information you provide is extremely important for Denuo. Therefore, when you use this Website or Resource or contact Denuo's representatives directly, we do our best to protect your personal data and any other information provided to Denuo strictly in accordance with applicable law.

This Policy is intended to provide you with information about how Denuo collects, processes, stores and protects personal data in connection with the use of the Website and Resource or other interaction with Denuo. This Policy also informs you of your rights, our obligations and the contact details of Denuo should you have any questions regarding the processing of your data.

By accessing this Website or Resource, you agree to the terms of processing your personal data as set out in this Policy. If you do not agree to such terms, you must cease using the Website or the Resource.

Categories of personal data processed by Denuo

Denuo collects, including on the Internet through the Website or the Resource, and processes personal data of the following categories of individuals (data subjects):

1. Representatives of current or prospective clients (counterparties) of Denuo and other persons to whom Denuo's marketing information is addressed.
2. Applicants for any vacancies or internship, or participants in any competitions, seminars or other events organised by Denuo, who have completed Denuo's surveys or questionnaires, provided their CVs or proposals for cooperation or any other documents containing personal information to Denuo.
3. Representatives of mass media, news outlets, information centres, publishing companies, rating and research agencies that interact with Denuo.
4. Other users of the Website or Resource that do not fall into the categories listed above.

The scope of personal data processed by Denuo varies depending on which category of data subjects you belong to. The type of personal data we collect also depends on whether you interact with us through the Website/Resource or by contacting Denuo directly.

Denuo may collect the following categories of personal data when you use the Website or the Resource:

List of Personal Data Processed	Categories of Subjects
<ul style="list-style-type: none">• Personal data provided when you register/create an account, including:<ul style="list-style-type: none">○ first name, patronymic, surname (if any)○ email○ telephone number○ gender/age	<ul style="list-style-type: none">• Current and potential clients (counterparties) and recipients of marketing information• Representatives of media platforms, information centres, publishing companies, rating and research agencies

List of Personal Data Processed	Categories of Subjects
<ul style="list-style-type: none"> ○ education ○ position/place of employment ○ account picture ○ username/password • Information that is automatically generated in the process of the use of the Website, the Resource and other Internet platforms: <ul style="list-style-type: none"> ○ electronic data (HTTP headers, IP address, cookies, web beacons/pixel tags, browser ID data, user device information, card tokens, hardware and software information, Wi-Fi network data) ○ date and time of access to the Website and/or the Resource ○ information on the activity during the use of the Website and/or the Resource (e.g. search query history, preferences, information on communication with other users, files and content stored on Denuo's systems) ○ other information as required to be processed in accordance with the terms governing the use of the Website or specific Denuo Resources 	<ul style="list-style-type: none"> • Applicants for vacancies, candidates for internships • Participants in competitions, seminars and other events organised by Denuo • Other users

In addition to the above, Denuo may process the following categories of personal data when you directly contact Denuo's representatives:

List of Personal Data Processed	Categories of Subjects
<ul style="list-style-type: none"> • First name, patronymic, surname (if any) • Contact details: <ul style="list-style-type: none"> ○ email ○ telephone number • Details of the entity of the data subject, for example: <ul style="list-style-type: none"> ○ employer's place of work, position and contact details ○ place of study, course and contact details of the educational institution 	<ul style="list-style-type: none"> • Current and potential clients (counterparties) and recipients of marketing information • Representatives of media platforms, information centres, publishing companies, rating and research agencies • Applicants for vacancies, candidates for internship • Participants in competitions, seminars and other events organised by Denuo
<ul style="list-style-type: none"> • Date of birth • Address of residence or registration • Identifiers (e.g. passport details, OGRN, INN, SNILS) 	<ul style="list-style-type: none"> • Current and potential clients (counterparties) and recipients of marketing information • Applicants for vacancies, candidates for internship • Participants in competitions, seminars and other events organised by Denuo
<ul style="list-style-type: none"> • Data on applicants • Details of education, work experience, qualifications • Any other personal data that applicants provide in CVs or cover letters 	<ul style="list-style-type: none"> • Applicants for vacancies, candidates for internship

List of Personal Data Processed	Categories of Subjects
<ul style="list-style-type: none"> • Areas of law of interest • Economic or business sector of interest • Preferences in the way of receiving marketing information 	<ul style="list-style-type: none"> • Current and potential clients (counterparties) and recipients of marketing information • Participants in competitions, seminars and other events organised by Denuo

Special categories of personal data

Denuo does not collect data to create a “profile” of a user of the Website and/or Resource or a potential client (counterparty) of Denuo to the extent that it might materially affect your rights and freedoms under applicable law.

Denuo does not knowingly collect or process sensitive personal information such as: racial origin, political opinions, religious or philosophical beliefs, health information, and biometric data (“**special categories of personal data**”). You may, however, provide such data to Denuo yourself, in which case Denuo will process it in accordance with this Policy and applicable law.

Denuo may process special categories of personal data if:

- the data subject has consented in writing to the processing of his or her personal data;
- personal data that the data subject has consented to disclose are processed, subject to the prohibitions and conditions set out in FZ-152;
- personal data are processed in accordance with the laws on state social assistance, labour legislation, the laws of the Russian Federation on state social security pensions and labour pensions;
- personal data processing is necessary for the protection of life, health or other vital interests of the data subject or life, health or other vital interests of other persons and obtaining consent of the data subject is impossible;
- personal data are processed for medical and preventive purposes, for establishing medical diagnosis, providing medical and medical-social services provided that the personal data are processed by a person professionally engaged in medical activity and obliged by law to observe medical secret;
- personal data processing is necessary for establishing or exercising the rights of the data subject or third parties, as well as in connection with defence and justice;
- personal data are processed in accordance with the laws on compulsory types of insurance, with the insurance legislation.

The processing of special categories of personal data in the cases provided for in clause 4 of article 10 of FZ-152 will cease immediately if the reasons for which Denuo processed them have been eliminated, unless otherwise provided by the federal law.

Denuo shall not be liable for the processing of special categories of personal data that have been provided by the data subject on their own initiative and without a proper legal ground.

Purposes and legal bases for processing personal data by Denuo

Denuo processes personal data only in the cases where one or more of the following legal bases for such processing exist:

1. The data subject has given consent to the processing of his or her personal data.
2. Personal data processing is necessary for the conclusion and performance of an agreement to which the data subject will be a party or beneficiary or guarantor.
3. The personal data being processed is required to be published or disclosed under the laws of the Russian Federation (e.g., publicly available information on the sole executive bodies or representatives of entities).
4. Personal data processing is necessary for the performance of the duties imposed on Denuo under Russian laws.

5. Personal data is processed in connection with the data subject's participation in legal proceedings in courts of the Russian Federation.
6. Personal data is processed to safeguard Denuo's legitimate interests, provided that the rights and legitimate interests of the data subject are not infringed (e.g., when carrying out KYC checks).
7. Personal data is processed for statistical or other research purposes, provided that personal data is depersonalised.

Where works and services are promoted on the market through direct contact with the potential client (customer) by means of telecommunications, Denuo will process personal data only with the data subject's prior consent. Denuo will cease processing such personal data immediately on the data subject's request.

Denuo will only process personal data where the processing of such data is necessary to achieve one or more of the following purposes:

1. Concluding and performing civil law contracts, including for the purpose of providing legal services under such contracts, responding to queries from current or prospective clients and counterparties, creating reports on the services provided and performing contracts to provide legal and other related services.
2. Providing access to the Website or the Resource, informing on Denuo's activities, changes to the laws and data relating to Denuo's business and services (including the personalisation of content and other materials).
3. The client (counterparty) or user of the Website or Resource receiving communications from Denuo, receiving enquiries and responding to such enquiries.
4. Deciding on the possibility for the applicant to fill vacancies and be included in the labour pool, deciding on the organisation and conduct of internships.
5. Receiving and sending materials on matters related to Denuo which are covered in the mass media, including on websites.
6. Promoting the resources, products and/or services of Denuo and its partners, carrying out marketing and promotional campaigns.
7. Carrying out statistical and other research on the use of the Website or the Resource, improving the quality and usability of the Website or the Resource, enhancing their effectiveness and supporting their operation.
8. Developing and training Denuo's employees and improving the quality of services provided by Denuo.
9. Participating in the assessment and various rankings of law firms.
10. Ensuring that data subjects have access to Denuo's offices and are able to attend meetings.
11. Performing duties imposed on Denuo under the laws of the Russian Federation.

Under no circumstances shall Denuo make decisions based solely on the automated processing of personal data which produces legal consequences in relation to the data subject or otherwise affect his or her rights and legitimate interests, except where the data subject has given his or her written consent to such decisions being taken, or other grounds for making such decisions are provided under the laws of the Russian Federation.

The processing of personal data by Denuo shall always be guided by the following key principles:

1. Denuo processes personal data on a lawful and fair basis.
2. Only personal data should be processed which serve the processing purposes.
3. In processing personal data, it is necessary to ensure the personal data's accuracy, adequacy and, where necessary, relevance in relation to the purpose of the personal data processing.
4. Personal data shall be stored in a form that makes it possible to identify the data subject, unless the period of storage of personal data is established by the laws of the Russian Federation, the contract to which the data subject is a party, beneficiary or guarantor.
5. The personal data being processed shall be destroyed or depersonalised when the purposes of processing have been achieved or when it is no longer necessary to achieve such purposes, unless otherwise provided under the laws of the Russian Federation.

6. Denuo shall respond promptly to any questions relating to the processing of your personal data.
7. The content and scope of personal data being processed shall correspond to the stated processing purposes of processing. The personal data being processed is not excessive in relation to the stated purposes of processing.
8. Denuo is prepared to tell you honestly and openly what personal data is collected by Denuo, how it is used by us, who it is shared with, and who you can contact if you have any questions.
9. Denuo makes every effort to protect your personal data and uses the most up-to-date and effective means.

Cookie terms of use

For the abovementioned purposes, Denuo uses cookies (for more details see the [Cookies Policy](#)). By agreeing to the terms of personal data processing set out in this Policy, you consent to the processing of cookies for the abovementioned purposes.

You can change the expiry date of cookies or prevent them from being stored in your browser settings.

Procedure for personal data processing

Denuo strictly observes personal data confidentiality and undertakes that it will not disclose or distribute personal data to third parties without the data subject's consent or other legal basis provided under laws of the Russian Federation.

Denuo ensures the protection and security of personal data through the application of the necessary legal, organisational and technical measures. Such measures include, *inter alia*:

Legal measures:

- development of bylaws establishing the requirements and procedure for personal data processing;
- refusal to use any data processing methods not meeting the requirements of laws.

Organisational measures:

- appointment of a person responsible for organising personal data processing and a person responsible for ensuring the security of personal data in personal data information systems;
- limiting the number of Denuo's employees who have access to personal data and organising an authorisation system to access such data;
- informing Denuo's employees directly involved in personal data processing of the provisions of data protection laws and Denuo's bylaws on personal data processing;
- regulating personal data processing processes at Denuo;
- organising record-keeping and storage of physical media for storing personal data in order to prevent theft, substitution, unauthorised copying and destruction of such data;
- limiting the ability of unauthorised persons to access Denuo's premises and preventing their presence on the premises where personal data is handled and where the hardware for its processing is located, without supervision by Denuo personnel.

Technical measures:

- use of compliant information security protection tools to neutralise current threats;
- assessing the effectiveness of measures taken to ensure the security of personal data;
- implementing of an authorisation system for Denuo's employees' access to the personal data processed in the information systems and to information protection software and hardware;
- detecting malware (using antivirus software) on all of Denuo's IT network nodes providing the relevant technical capability;
- detecting intrusions into Denuo's information system which breach, or cause breaches of, the existing personal data security requirements;

- periodic monitoring of the activities of employees involved in the personal data processing, investigations into breaches of personal data security requirements.

Denuo may instruct third parties to process personal data with the data subject's consent. The person processing personal data on behalf of Denuo must comply with all personal data processing principles and rules established by laws of the Russian Federation and the procedure provided under this Policy and ensure that the level of personal data protection is not lower than that provided under this Policy.

If Denuo entrusts a third party with personal data processing, Denuo shall be responsible to the data subject for the actions of such third party. The person processing personal data on behalf of Denuo shall be liable to Denuo.

Time limits for personal data processing

Denuo processes personal data during the period needed to achieve the personal data processing objectives set out in this Policy, or the period provided under the laws of the Russian Federation.

Place of storage of personal data

When collecting personal data on Russian citizens, Denuo ensures that Russian citizens' personal data is recorded, systematised, stored, and rectified (updated or modified) and retrieved using databases located in Russia.

Destruction procedure

Personal data processed by Denuo shall be subject to a uniform procedure for data destruction provided under the laws of the Russian Federation and Denuo's bylaws.

Personal data must be destroyed, in particular, if the purpose of the processing has been achieved or if you as the data subject have withdrawn your data processing consent (and no other grounds exist for the processing of such data), or if it has been discovered that the data is processed unlawfully.

If the data processing purpose is achieved, Denuo will cease to process the personal data and destroy it within up to 30 (Thirty) days of the date when the processing purpose is achieved, unless another time limit is established by law. If the data subject withdraws their data processing consent, Denuo will stop processing such data and, if the retention of data is no longer required for the purpose of processing under the laws, will destroy it within up to 30 (Thirty) days of the date of receipt of such withdrawal notice.

If it is discovered that the processing of personal data by Denuo is not carried out lawfully, Denuo shall cease such processing within up to five business days of the date of such discovery. If it is impossible to ensure that such processing is carried out lawfully, Denuo will destroy such data within up to 10 (Ten) business days of the date when such unlawful processing is discovered. In doing so, Denuo will notify the data subject that the breaches have been rectified or that their personal data has been destroyed.

Data subjects' rights and obligations and Denuo's obligations

We will ensure that your rights under applicable data protection laws are respected. In your relationships with Denuo, you, as a data subject, have a right to:

1. obtain from Denuo information relating to the processing of your personal data, in particular:
 - confirmation of the personal data processing;
 - information on the legal grounds and the purposes of the personal data processing;
 - information on the personal data processing methods;
 - information on the scope and list of personal data being processed and the source of such data;
 - information on the time limits for personal data processing;
 - information on the person processing personal data on behalf of Denuo.

2. demand that Denuo rectify, block or delete personal data if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, and take measures provided by law to protect his or her rights.
3. revoke the consent to personal data processing granted to Denuo at any time. However, in the cases expressly provided under laws, Denuo may continue to process personal data even after the data subject withdraws his or her consent.
4. Take such measures to protect his/her rights as are provided under laws of the Russian Federation.

Please note that the data subject is responsible for the personal data provided being lawful, up to date and accurate.

Acting as an operator, Denuo shall, for the purposes of exercising the rights of data subjects, in particular, be obliged to:

1. Provide, at the data subject's request, information on the personal data processing to the extent required under laws of the Russian Federation.
2. Comply with other obligations established under the data protection laws of the Russian Federation.
3. Take measures aimed at fulfilling the obligations established under the data protection laws of the Russian Federation, including ensuring the security of personal data in the course of its processing.

This Policy may be amended, including where the relevant adjustments are due to amendments to the applicable laws or changes in Denuo's operations.

Contacts for data subjects

All suggestions in relation to this Policy, requests and queries for the purposes of exercising your rights and legitimate interests or considering your complaints should be sent by email to msk@denuo.legal or by mail to: 25 Leontievsky pereulok, Moscow, 125375, Russian Federation.

Denuo will consider requests relating to the provision of information on personal data processing within a reasonable period of time. If such request or claim is justified, Denuo will satisfy your claim or provide the information requested at no cost to you.