

Publisher Privacy Policy notice for websites, using GDPR Data & Federal Law of July 27 2006 № 152-FZ "On Personal Data"

Limited Liability Company "BIMSoft"(LLC), the owner of this website, has created this privacy statement in order to demonstrate our deep commitment to the privacy of our site, visitors and customers. As a company, we strictly adhere to all industry guidelines and we continually review our policy and procedures to ensure the safety and protection of our visitor and customer information. We request all the users of our website to go through this policy to understand how their personal & business information will be treated as they make full use of our services to their benefit.

This privacy notice is provided in a layered format so you can click through to the specific areas set out below.

List of abbreviations used

LLC "BIMSoft" - Limited Liability Company "BIMSoft"

Code of Administrative Offenses - RF Code of Administrative Offenses

PD - Personal data

RF - Russian Federation

The Labor Code - Labor Code of the Russian Federation

Criminal Code - Criminal Code of the Russian Federation

Terms and Definitions

Information - information (messages, data) regardless of the form of their presentation. Personal data - any information relating directly or indirectly to a specific or identifiable individual (personal data subject).

Operator - a state body, a municipal body, a legal entity or an individual, independently or jointly with other persons organizing and (or) carrying out PD processing, as well as determining the purposes of PD processing, the composition of PD to be processed, actions (operations) performed with PD.

Processing of personal data - any action (operation) or a set of actions (operations) performed using automation tools or without using such means with personal data, including collection, recording, systematization,

accumulation, storage, clarification (updating, modification), extraction, use , transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of PD.

Personal data information system - a set of personal data contained in databases and information technologies and technical means that ensure their processing.

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1. WHO WE ARE AND IMPORTANT INFORMATION

What is the purpose of this privacy notice?

This privacy notice aims to give you information on how we collect and process your personal data through your use of this website, including any data you may provide through this website when you contact us.

This website is not intended for children and we do not knowingly collect data relating to children.

You must read this privacy notice together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal data about you so that you are fully aware of how and why we are using your data. This privacy notice supplements the other notices and is not intended to override them.

Data controller(s)

Limited Liability Company «BIMSoft» (LLC) is the controller and responsible for your personal data (collectively referred to as “Limited Liability Company «BIMSoft» (LLC) ” “we”, “us” or “our” in this privacy notice). Our contact details are Address: 143405, Moscow region, Krasnogorsk city, Construction street, house 3a, room 010 floor 2.

Email Address: support@BIMSoft.ru Telephone Number: +7 916 421 66 88.
For all data matters contact our Data Representative - General Director
Khokhlov Maxim Mikhailovich.

This Policy is put into effect by order of the General Director of BIMSoft LLC and is valid indefinitely.

LLC "BIMSoft" reviews the provisions of this Policy and updates them as necessary, but at least once a year, and also:

- when changing the provisions of the legislation of the Russian Federation in the field of personal data;
- in cases of identification of inconsistencies affecting the processing and (or) protection of personal data;
- based on the results of monitoring compliance with the requirements for the processing and (or) protection of personal data;
- by decision of the management of BIMSoft LLC.

When changes are made, the date of the last revision is indicated. The new edition is put into effect by order of the General Director of BIMSoft LLC.

The old version of the Policy, together with the familiarization sheet, is kept by the person responsible for organizing the processing of PD.

The current version of the Policy on paper is kept in the personnel department of BIMSoft LLC.

In accordance with Part 2 of Art. 18.1 of the Federal Law of July 27, 2006 № 152-FZ "On Personal Data", unrestricted access to the Policy is ensured by publishing it on the website of BIMSoft LLC on the Internet (<https://bimtender.ru/>).

Third-party links outside of our control

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements.

When you leave our website, we encourage you to read the privacy notice of every website you visit.

2. THE PERSONAL DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. You can find out more about personal data from the Information Commissioners Office.

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, last name and title.
- **Contact Data** includes email address, business address, and telephone number.

We also collect, use and share aggregated data such as statistical or demographic data for any purpose. Aggregated data may be derived from your personal data but is not considered personal data in law as this data does not directly or indirectly reveal your identity. For example, we may aggregate your usage data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect aggregated data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

If you fail to provide personal data

Where we need to collect your personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

3. HOW WE COLLECT YOUR PERSONAL DATA

We use different methods to collect data from and about you including through:

For example,

- **Directly.** You may give us your identity, contact and financial data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you apply for our products or services.

4. HOW WE USE YOUR PERSONAL DATA

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- **Performance of Contract** this means processing your data where it is necessary for the performance of a contract to which you are a party or to take steps at your request before entering into such a contract.
- **Legitimate Interest** this means the interest of our business in conducting and managing our business to enable us to give you the best service/product and the most secure experience. We make sure we consider and balance any potential impact on you (both positive and negative) and your rights before we process your personal data for our legitimate interests. We do not use your personal data for activities where our interests are overridden by the impact on you (unless we have your consent or are otherwise required or permitted to by law).
- **Comply with a legal or regulatory obligation** this means processing your personal data where it is necessary for compliance with a legal or regulatory obligation that we are subject to.

Generally we do not rely on consent as a legal basis for processing your personal data.

PURPOSES FOR WHICH WE WILL USE YOUR PERSONAL DATA

We have set out below, in a table format, a description of all the ways we plan to use your personal data, with the legal bases we rely on to do so.

Note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your data.

| Purpose/Activity | Type of data | Lawful basis for processing including basis of legitimate interest |
|--|-----------------------------|---|
| To register you as a new customer | (a) Identity (b) Contact | Performance of a contract with you |
| To contact you with relevant opportunities which may be of interest to you | (a) Identity (b) Contact | Legitimate interest |

Marketing

We strive to protect you with our personal data uses, particularly around marketing and advertising. In this regard we have chosen not use general marketing campaigns by email or post.

Promotional offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be directly relevant for you.

You may receive marketing communications from us if you have requested information from us or purchased goods or services from us and, in each case, you have not informed our Data Representative that you wish to opt out of receiving that marketing.

Third-party marketing

We will get your express opt-in consent before we share your personal data with any company outside of Limited Liability Company «BIMSoft» (LLC).

Opting out

You can ask us or third parties to stop sending you marketing messages at any time by contacting our Data Representative. Where you opt out of receiving any marketing messages, this will not apply to personal data provided to us as a result of a product/service purchase, or a product/service experience.

Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our cookie policy, which can be found on our website.

Change of purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact our Data Representative.

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis, which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Purpose of the Policy

This Policy of BIMSoft LLC in relation to the processing of personal data (hereinafter referred to as the Policy) defines the basic principles, purposes, conditions and methods of processing personal data (PD), categories of PD subjects and processed PD, rights and obligations of BIMSoft LLC when processing PD, the rights of PD subjects, as well as the measures implemented in JSC BIMSoft LLC to ensure the security of PD in the implementation of the types of activities established in the Charter.

The provisions of this Policy serve as the basis for the development of local acts regulating in BIMSoft LLC issues of processing personal data of employees of BIMSoft LLC, applicants for filling vacant positions, former employees of BIMSoft LLC and other PD subjects.

This Policy applies to all processes related to the processing of personal data and carried out both with the use of automation tools and without the use of such tools.

Legal basis for the development of the Policy

The following types of PD processing are carried out at BIMSOFT LLC:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- clarification (update, change);
- use;
- extraction;
- transmission (provision, access);
- depersonalization;
- blocking;
- deletion;
- destruction.

PD processing in BIMSOFT LLC is carried out in the following ways:

- non-automated processing of personal data;
- automated processing of personal data;
- mixed processing of PD.

The policy was developed in accordance with the requirements of the Federal Law of July 27, 2006 № 152-FZ "On Personal Data", as well as taking into account the provisions of the Constitution of the Russian Federation, the codes of the Russian Federation, Federal laws and regulations of the Russian Federation in the field of personal data.

5. WHO WE SHARE YOUR PERSONAL DATA WITH

We may have to share your personal data with the parties set out below for the purposes set out in the table in paragraph 4 above.

- External Third Parties Service, for example:
- Providers based in the Russian Federation, UK, USA, European Union who provide it and system administration services.
- Professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services.
- Supervisory authorities – Federal Service for Supervision in the Sphere of Telecom, Information Technologies and Mass Communications (ROSKOMNADZOR), The Tax Service, The Customs Service, regulators and other authorities acting as processors or joint controllers based in the Russian Federation, UK, USA, European Union who require reporting of processing activities in certain circumstances.
- Third parties to whom we may choose to sell, transfer, or merge parts of our business or our assets. Alternatively, we may seek to acquire other businesses or merge with them. If a change happens to our business, then the new owners may use your personal data in the same way as set out in this privacy notice.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

6. INTERNATIONAL TRANSFERS

We can transfer your personal data outside the European Economic Area, including implementation of internal control over the compliance of PD processing with the Federal Law of July 27, 2006 № 152-FZ "On Personal Data" and the regulatory legal acts adopted in accordance with it, the requirements for the protection of PD, this Policy, local regulations.

7. DATA SECURITY

We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal data to those employees, agents, contractors and other third parties who have a

business need to know. They will only process your personal data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

8. DATA RETENTION

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it.

By law we have to keep basic information about our customers (including contact, identity, financial and transaction data) for six years after they cease being customers for tax purposes.

In some circumstances you can ask us to delete your data: see Your legal rights below for further information.

In some circumstances we may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

9. YOUR LEGAL RIGHTS

Unless subject to an exemption under the data protection laws, you have the following rights with respect to your personal data:

- The right to request a copy of the personal data which we hold about you;
- The right to request that we correct any personal data if it is found to be inaccurate or out of date;
- The right to request your personal data is erased where it is no longer necessary to retain such data;
- The right to withdraw your consent to the processing at any time, where consent was the lawful basis for processing your data;
- The right to request that we provide you with your personal data and where possible, to transmit that data directly to another data controller, (known as the right to data portability), where applicable i.e. where our processing is based on consent or is necessary for the performance of our contract with you or where we process your data by automated means);
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing;
- The right to object to our processing of personal data, where applicable i.e. where processing is based on our legitimate interests (or in

performance of a task in the public interest/exercise of official authority); direct marketing or processing for the purposes of scientific/historical research and statistics).

If you wish to exercise any of the rights set out above, please contact our Data Representative.

All PD processing is carried out on the basis of the following principles:

- PD processing is carried out on a legal and fair basis;
- PD processing is limited to the achievement of specific, predetermined and legal purposes;
- PD processing that is incompatible with the purposes of PD collection is not allowed;
- it is not allowed to combine databases containing personal data, the processing of which is carried out for purposes incompatible with each other;
- only PD that meet the purposes of their processing are subject to processing;
- the content and volume of processed personal data correspond to the stated purposes of processing;
- when processing PD, the accuracy of PD is ensured, their sufficiency and relevance in relation to the purposes of PD processing;
- PD storage is carried out in a form that allows determining the PD subject no longer than the purpose of PD processing requires, if the PD storage period is not established by federal laws of the Russian Federation, by an agreement to which the PD subject is a party, beneficiary or guarantor;
- processed PD are subject to destruction or depersonalization upon achievement of processing goals or in case of loss of the need to achieve these goals, unless otherwise provided by federal laws of the Russian Federation.

In LLC "BIMSoft" PD is processed in order to:

- performing the functions, powers and duties imposed by the legislation of the Russian Federation on BIMSoft LLC, including compliance with the legislation on joint-stock companies, as well as the provision of personal data to government bodies, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, and the Federal Fund compulsory health insurance;
- regulation of labor relations with employees of BIMSoft LLC (assistance in employment, training, ensuring interaction between BIMSoft LLC employees, ensuring personal safety, monitoring the quantity and quality of work performed, ensuring the safety of property);
- ensuring compliance with local regulatory legal acts of LLC "BIMSoft"
- preparation, conclusion, execution and termination of contracts with clients and / or counterparties of BIMSoft LLC

- consulting on the products and services of BIMSoft LLC, as well as promoting the products and services of BIMSoft LLC and conducting marketing activities, including procurement awards, established by BIMSoft LLC;
- ensuring access control;
- formation of reference materials for the internal information support of the activities of LLC "BIMSoft".

No fee required – with some exceptions.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable admin fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

Time limit to respond

We try to respond to all legitimate requests within one working week. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

LLC "BIMSOFT" has the right:

- to protect their rights and legal interests in court;
- provide PD of subjects to third parties, if it is provided for by the current legislation of the Russian Federation (law enforcement, judicial, tax authorities and others);
- process PD in order to achieve the goals stipulated by international treaties of the Russian Federation or by law, for the implementation and / or fulfillment of duties, functions and powers imposed by the legislation of the Russian Federation on BIMSOFT LLC;
- refuse to provide PD in cases stipulated by Part 6, Art. 14 of the Federal Law of July 27, 2006 № 152-FZ "On Personal Data";
- process the personal data of the subject without his consent, in the cases provided for in Part 1, Art. 6 of the Federal Law of July 27, 2006 № 152-FZ "On Personal Data".

LLC "BIMSOFT" is obliged:

- take measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Federal Law of July 27, 2006 № 152- FZ "On Personal Data" and the regulatory legal acts adopted in accordance with it;
- publish or otherwise provide unrestricted access to the document defining its policy in relation to PD processing, to information about the implemented requirements for PD protection;
- take the necessary legal, organizational and technical measures or ensure their adoption to protect PD from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution of PD, as well as from other illegal actions in relation to processed PD;
- in the case of receiving PD not from the PD subject, except for the cases provided for in Part 4, Art. 18 of the Federal Law of July 27, 2006 № 152-FZ "On Personal Data", before the start of processing such PD, provide the PD subject with the following information:
 - name and address of the Operator or his representative;
 - the purpose of PD processing and its legal basis;
 - list of prospective PD users;
 - the rights of a personal data subject established by the Federal Law of July 27, 2006 № 152-FZ "On Personal Data";
 - source of obtaining PD.
- provide free of charge to the PD subject or his representative the opportunity to get acquainted with the PD related to this PD subject, in accordance with Part 3 of Art. 20 of the Federal Law of July 27, 2006 № 152-FZ "On Personal Data";
- act in accordance with the provisions of the Federal Law of July 27, 2006 № 152-FZ "On Personal Data" in cases of detection of inaccurate, incomplete or irrelevant PD, illegal processing of PD, achievement of PD processing goals;
- if there is no possibility of PD destruction within the period specified in Art. 21 of the Federal Law of July 27, 2006 № 152-FZ "On Personal Data", to block such PD and ensure the destruction of PD within a period of no more than six months, unless another period is established by federal laws of the Russian Federation.

10. CHANGES TO THIS NOTICE AND YOUR DUTY TO INFORM US OF CHANGES

Please keep us informed if your personal data changes during your relationship with us. It is important that the personal data we hold about you is accurate and current.

11. QUERIES, REQUESTS OR CONCERNS

To exercise all relevant rights, queries or complaints in relation to this policy or any other data protection matter between you and us, please in the first instance contact our Data Representative.

If this does not resolve your complaint to your satisfaction, you have the right to lodge a complaint with the Office & via Email Address:

support@BIMSoft.ru. Telephone Number: +7 916 421 66 88.

For all data matters contact our Data Representative - General Director Khokhlov Maxim Mikhailovich.

Responsibility for violations in the field of processing and protection of personal data

In case of non-observance of the order and / or the rules for ensuring IS established by the IS Policy, the persons guilty of this are liable (disciplinary, administrative, material and / or criminal) depending on the nature of the violation and the severity of the negative consequences for BIMSoft LLC.

Liability stipulated by the Labor Code of the Russian Federation

- An employee of the Company who is guilty of a single negligent violation of this Policy, which did not entail significant property or non-property damage, may be subject to a penalty in the form of a remark (clause 1 of part 1 of article 192 of the Labor Code of the Russian Federation).
- An employee of the Company who is guilty of repeated negligent violation of this Policy, which did not entail significant property or non-property damage, may be punished in the form of a reprimand (clause 2, part 1, article 192 of the Labor Code of the Russian Federation).
- An employee of the Company guilty of a one-time deliberate violation of this Policy, which did not entail significant property or non-property damage, may be punished with a reprimand.
- An employee of the Company who already has a penalty for an unintentional violation of this Policy, guilty of a one-time intentional violation of this Policy, which did not entail significant property or non-property damage, may be subject to a penalty in the form of a reprimand or dismissal (clause 2 of part 1 of article 192 of the Labor Code of the

Russian Federation and clause 5 of part 1 of article 81 of the Labor Code of the Russian Federation).

- An employee of the Company guilty of repeated deliberate violation of this Policy, which did not entail significant property or non-property damage, may be subject to a penalty in the form of a reprimand or dismissal (clause 2 of part 1 of article 192 of the Labor Code of the Russian Federation and clause 5 of part 1 of article 81 of the Labor Code of the Russian Federation).
- An employee guilty of disclosing confidential information bears full financial responsibility for damage caused by the disclosure of this information (clause 7, part 1, article 243 of the Labor Code of the Russian Federation).

Responsibility stipulated by the Code of the Russian Federation on Administrative Offenses

- Violation of the procedure established by law for collecting, storing, using or distributing information about citizens (personal data) entails a warning or the imposition of an administrative fine on citizens in the amount of 300 to 500 rubles (Article 13.11 of the Administrative Code of the Russian Federation).
- Disclosure of information, access to which is limited by federal law (except in cases where disclosure of such information entails criminal liability) by a person who has gained access to such information in connection with the performance of professional duties, entails the imposition of an administrative fine on citizens in the amount of 500 to 1000 rubles (Article 13.14 of the Code of Administrative Offenses of the Russian Federation).

Responsibility provided by the Criminal Code of the Russian Federation

- Illegal collection or dissemination of information about the private life of a person constituting his personal or family secret, without his consent, or dissemination of this information in a public speech, publicly displayed work or in the media, is punishable by a fine of up to 200,000 rubles or in the amount of wages or other income of the guilty person for a period of up to 18 months, or compulsory labor for up to 360 hours, or corrective labor for up to 1 year, or forced labor for up to 2 years with the deprivation of the right to hold certain positions or engage in certain activities for up to 3 years or without it, or arrest for up to 4 months, or imprisonment for up to 2 years (part 2 of article 183 of the Criminal Code of the Russian Federation).
- Disclosure or use of information constituting a commercial secret without the consent of the Company by the person to whom this information was entrusted or became known from work, if this crime caused major damage to the Company and / or was committed out of selfish interest, is punished with a fine of up to 200,000 rubles or in the amount of wages or other income of

the perpetrator for a period of up to 18 months, or forced labor for up to 5 years, or imprisonment for up to 5 years (part 1 of Art. 137 of the Criminal Code of the Russian Federation).