

POLICY
on the processing and protection of personal data and the rules for using the
information resource of the Ural Forum "Cybersecurity in Finance," held on February
17–19, 2027

21.09.2026

1. GENERAL PROVISIONS

1.1. The Policy on the processing and protection of personal data during the event Ural Forum "Cybersecurity in Finance," February 17–19, 2027 (hereinafter – the Policy, the Forum) determines the principles, purposes, conditions, terms, and methods of processing personal data (hereinafter – PD), the list of categories of PD subjects, the list of actions performed with the PD of subjects, the rights of PD subjects, measures for monitoring compliance with the requirements of the legislation of the Russian Federation regarding the processing of PD, as well as measures for the protection of PD.

1.2. The Policy is applied for:

- organizing the process of PD processing in accordance with the requirements of current legislation;
- developing measures for the timely detection of facts of unauthorized access (UAA) to PD and determining measures to prevent UAA to PD;
- organizing control over ensuring the established level of PD protection.

1.3. The Policy is drawn up in Russian. The text of the Policy in English is posted on the website <https://uralcyberfin.ru/>.

1.4. Responsibility for compliance with the requirements of the legislation of the Russian Federation and the local normative acts of the Organization in the field of PD rests with the General Director.

1.5. The Policy is mandatory for execution by officials of the Organization when solving tasks of ensuring the processing and security of PD.

1.6. The Organization has the right to make changes to this Policy. When changes are made, the date of the last update of the revision is indicated in the header of the Policy.

2. BASIC TERMS AND DEFINITIONS

2.1 The following terms and definitions are used in the Policy:

- confidentiality of personal data – the requirement, mandatory for compliance by the designated responsible person who has gained access to the personal data of personal data subjects, not to allow their dissemination without the consent of the subject or another lawful basis;
- operator – Limited Liability Company "EFFECTIVE COMMUNICATIONS" (INN 7716792536, OGRN 5147746475058, address: 101000, Moscow, INT.TER.G. MUNICIPAL DISTRICT BASMANNY, Potapovsky Lane, bldg. 5, str. 2), independently or jointly with other persons organizing and/or carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data subject to processing, and the actions (operations) performed with personal data;

3. PROCESSING OF PERSONAL DATA

3.1. Principles of personal data processing

3.1.1. The processing of PD is limited to the achievement of specific, predetermined, and lawful purposes.

3.1.2. The combining of databases containing PD whose processing is carried out for purposes incompatible with each other is not permitted.

3.1.3. Only PD that meet the purposes of their processing are subject to processing.

3.1.4. The content and scope of the processed PD correspond to the declared purposes of processing. The processed PD are not excessive in relation to the declared purposes of their processing.

3.1.5. When processing personal data, the accuracy of the personal data, their sufficiency, and, where necessary, their relevance to the purposes of processing personal data are ensured. The Organization takes the necessary measures, or ensures their adoption, to delete or clarify incomplete or inaccurate data.

3.1.6. The storage of personal data is carried out in a form that allows determining the subject of personal data, no longer than required by the purposes of processing personal data established by clause 3.2 of the Policy, unless the storage period of personal data is established by federal law or by a contract to which the subject of personal data is a party, a beneficiary, or a guarantor.

3.1.7. The processed personal data are destroyed upon achievement of the purposes of processing or in the event of loss of the need to achieve these purposes, unless otherwise provided by federal law.

3.1.8. PD are not disclosed to third parties and are not disseminated without the consent of the PD subject, unless otherwise provided by federal laws.

3.1.9. The protection of PD is ensured at all stages of their processing and in all modes of functioning of personal data processing systems.

3.2. Purposes of personal data processing

3.2.1. The processing of PD during the Forum is carried out for the following purposes:

- ensuring compliance with legislative and normative legal acts of the Russian Federation;
- preparation, conclusion, execution, and termination of contracts with counterparties;
- preparation of a badge for participation in the Forum;
- ensuring pass and internal facility access regimes at the venues of the event, events of the business and cultural program of the Forum, receptions, exhibitions, and business meetings;
- informing potential participants of the Forum about the dates and venue of its holding;
- posting a biography on the Forum website (for speakers);
- carrying out a set of actions aimed at providing access to the functionality and content of the Bot for participation in the Forum;
- sending information messages.

3.3. List of personal data subjects

3.3.1. During the Forum, the processing of the following categories of PD subjects is carried out for the purposes established by clause 3.2.1 of the Policy:

- Forum participants;
- Forum speakers;
- Forum partners;
- designated managers from partner companies;
- volunteers;
- winners of the Youth Program;
- contractors.

3.4. List of processed personal data

3.4.1. PD are used for the purposes established in clause 3.2.1 of the Policy and include the following data:

3.4.2. Identification and contact data:

- Surname;
- First name;
- Patronymic (if any);
- Date of birth;
- Place of birth;
- Citizenship (selected from a drop-down list);

- Contact telephone number;
- Email address (e-mail);
- Nickname (alias) on Telegram, WhatsApp, or MAX, if available/provided (for volunteers).

3.4.3. Passport data and identity documents:

- Series and number of the citizen's passport (or another identity document);
- Electronic image (scan copy, photograph) of pages 2 and 3 of the document containing information about the subject's identity, provided exclusively for data verification in order to ensure security and comply with the requirements for organizing the pass regime at protected facilities;
- Taxpayer Identification Number (INN), photo/scan of the document containing the INN (for Youth Program winners);
- Individual Personal Account Insurance Number (SNILS), photo/scan of the document containing the SNILS (for Youth Program winners);
- Bank details for the prize (monetary award) transfer: current account number, bank name, and BIK (for Youth Program winners).

3.4.4. Data for ensuring the pass regime:

- Photographic image of the personal data subject, provided exclusively for visual comparison with the individual upon entry to the event without the use of automatic facial recognition means. The photo is not used for biometric identification within the meaning of Article 11 of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" (with amendments and additions).

3.4.5. Data on professional activity and company:

- Place of work (company name);
- Short name of the company for placement on the badge;
- Field of activity of the company;
- Position;
- The company's role at the event (for partner company managers);
- Required partnership options (for partners);
- Company INN;
- Company website address (if any).

3.4.6. Data transmitted automatically:

- Cookie files (data on activity on the website, IP address, browser type, information on actions necessary for the functioning of the service and the collection of statistics).

3.4.7. Data regarding chatbot users

- surname, first name, patronymic (if applicable);
- username;
- interaction history with the Bot.

3.5. Terms of personal data processing

3.5.1. The processing of PD for the purposes established in clause 3.2.1 of the Policy is carried out until the achievement of the set purposes of personal data processing, unless another term of personal data processing is established by federal law, by a contract to which the personal data subject is a party, or by consent to the processing of personal data.

3.6. Conditions of personal data processing

3.6.1 The processing of PD is carried out with the consent of the PD subject to the processing of their PD.

3.6.2 The consent of the PD subject, signed with a simple electronic signature, is recognized as an electronic document equivalent to consent signed by the personal data subject's own hand.

3.6.3 Consent is considered signed with a simple electronic signature and fully identical to a similar document on paper, and the simple electronic signature of the PD subject is equal in significance (including legal) to their own handwritten signature, from the moment of provision of the code received in an SMS message or in an email, in the event that the code was sent to the telephone number or email address specified by the PD Subject.

3.6.4 The signing of the electronic document by the PD Subject is established by comparing the following information: Surname, first name, patronymic (if any), the code used to sign the electronic document, the Operator's receipt of information about the date and time of sending the code to the telephone number or email address specified by the PD Subject; the telephone number or email address specified by the PD Subject.

3.6.5. The PD Subject bears the risk of all adverse consequences that may occur in connection with the transfer to third parties of the SIM card that provides the ability to use the telephone number specified by them, access to the email inbox specified by them, including risks associated with unfair or unlawful actions of third parties who were able to gain access to the above information.

3.6.6 The Organization has the right to entrust the processing of PD to another person with the consent of the PD subject, unless otherwise provided by federal law, on the basis of a contract concluded with this person (hereinafter – the "operator's instruction"). The person carrying out the processing of PD under the instruction of the operator is obliged to comply with the principles and purposes of PD processing provided for by the Policy and the Federal Law "On Personal Data." The operator's instruction defines the list of actions (operations) with PD that will be performed by the person carrying out the processing of PD and the purposes of processing, establishes the obligation of such person to observe the confidentiality of PD and ensure the security of PD during their processing, and also specifies the requirements for the protection of the processed PD in accordance with Article 19 of the Federal Law "On Personal Data."

3.7. Methods of personal data processing

3.7.1 The processing of PD for the purposes established in clause 3.2.1 of the Policy is carried out by means of automated and non-automated (mixed) processing of personal data.

3.7.2 Cross-border transfer of PD is not carried out.

3.8. List of actions performed with the personal data of subjects

3.8.1 The processing of personal data for the purposes established in clause 3.2.1 of the Policy includes collection, systematization, accumulation, storage, clarification (updating, modification), use, transfer (provision, access), blocking, deletion, destruction of PD, and correction of errors.

3.9. Rights of the personal data subject

3.9.1. PD subjects have the right to receive information concerning the processing of their personal data, including:

- confirmation of the fact of processing of personal data by the operator;
- legal grounds and purposes of processing personal data;
- purposes and methods of processing personal data used by the operator;
- name and location of the operator, information about persons (except employees of the operator) who have access to personal data or to whom personal data may be disclosed on the basis of a contract with the operator or on the basis of federal law;
- processed personal data relating to the corresponding personal data subject, the source of their receipt, unless a different procedure for providing such data is provided by federal law;
- terms of processing of personal data, including terms of their storage;
- procedure for the exercise by the personal data subject of the rights provided for by the Federal Law "On Personal Data";
- name or surname, first name, patronymic, and address of the person carrying out the processing of personal data under the instruction of the operator, if the processing has been or will be entrusted to such person;
- other information provided for by the Federal Law "On Personal Data" or other federal laws.

3.9.2. The right of the PD subject to access their PD may be limited in accordance with federal laws, including if the access of the PD subject to their PD violates the rights and lawful interests of third parties.

3.10. Procedure for processing personal data

3.10.1. Sources of obtaining PD:

- the PD subject;
- the legal representative of the PD subject.

3.10.2. The Organization does not have the right to obtain and process PD of the PD subject concerning their race, nationality, political views, religious or philosophical beliefs, or intimate life.

3.10.3. In the case of using forms located in the services on the Internet site of the Forum at <https://uralcyberfin.ru/> to obtain PD:

- the possibility of unhindered familiarization of the PD subject with the Policy on the processing and protection of personal data and the rules for using the information resource of the Forum is provided;
- PD are transferred for processing only after obtaining the consent of the PD subject to the processing of their PD by placing the corresponding mark (checkbox) in the registration form on the corresponding page of the Internet site of the Forum.

3.10.4. The Organization receives PD from the subject themselves or their representative, after receiving from such subject or their representative consent to the processing of their PD, unless otherwise stipulated by the current legislation of the Russian Federation.

3.10.5. The processing of PD may be carried out exclusively for the purposes specified in clause 3.2 of the Policy.

3.10.6. The PD of subjects are processed and stored in the personal data information system of the Forum.

3.10.7. Users of the personal data information system of the Forum are prohibited from recording and storing information containing personal data on external (removable) media.

3.10.8. When making decisions affecting the interests of the PD subject, the Organization does not have the right to rely on personal data obtained exclusively as a result of their automated processing.

3.10.9. When transferring PD, the Organization undertakes to comply with the following requirements:

- not to communicate the personal data of the personal data subject to a third party without their consent, except in cases where this is necessary in order to prevent a threat to the life and health of the personal data subject, as well as in cases established by federal laws;
- to warn persons who have received the personal data of the personal data subject that these data may be used only for the purposes for which they were communicated, and to require these persons to confirm that this rule has been observed.

3.10.10. In the event of detection of unlawful actions with personal data, the Operator, within a period not exceeding 3 (three) business days from the date of such detection, is obliged to stop the unlawful processing of personal data or ensure its cessation by the person acting under the instruction of the

Operator. In the event of the impossibility of eliminating the violations committed, the Operator, within a period not exceeding 10 (ten) business days from the date of detection of the unlawfulness of actions with personal data, is obliged to destroy such personal data or ensure their destruction.

3.10.11. The Organization is obliged to notify the personal data subject of the elimination of the violations committed or the destruction of personal data, and if the application or request was sent by the authorized body for the protection of the rights of personal data subjects, also the said body.

3.10.12. Personal data are destroyed in the following cases:

- achievement of the purposes of processing personal data;
- withdrawal by the personal data subject of consent to the processing of their personal data. The destruction of PD upon receipt of a withdrawal of consent is carried out within a period not exceeding 30 (thirty) days from the date of receipt of the withdrawal, unless otherwise provided by the contract.

3.11. Updating, correction, deletion, and destruction of personal data, responses to requests from subjects for access to personal data

3.11.1. In the event of confirmation of the fact of inaccuracy of PD or the unlawfulness of their processing, the personal data are subject to updating by the operator, and the processing must be stopped.

3.11.2 The PD subject (authorized body), in connection with the discovery of inaccuracy of PD and/or the unlawfulness of their processing, sends a request (application) with the following content: "PD are incorrect" and/or "Processing of PD is unlawful," indicating the surname of the PD subject and the composition of the incorrect information.

3.11.3. The personal data subject withdraws consent by personal application or by sending a written application indicating the surname, first name, patronymic, date and place of birth of the personal data subject.

3.11.4. The sending by the personal data subject of a written application is carried out:

- in electronic form, including in the form of an electronic document signed with a simple electronic signature or an enhanced qualified electronic signature, to the address <https://uralcyberfin.ru/>;
- by postal message – to the address: index 101000, Moscow, Potapovsky Lane, bldg. 5, str. 2, office 305.

4. PROTECTION OF PERSONAL DATA OF SUBJECTS

4.1 Main measures for ensuring the security of personal data

4.1.1. Ensuring the security of PD during their processing is achieved by excluding unauthorized,

including accidental, access to PD, the result of which may be the destruction, modification, blocking, copying, dissemination of PD, as well as other unauthorized actions with PD.

4.1.2. Measures for ensuring the security of PD are determined depending on the level of protection of personal data in the ISPD, taking into account the possible occurrence of threats to the vital interests of the individual, society, and the state.

4.1.3. Measures are implemented aimed at fulfilling the requirements established by the Federal Law "On Personal Data":

- obtaining the consents of PD subjects to the processing of their PD, except in cases provided for by the legislation of the Russian Federation;
- appointment of a person responsible for organizing the processing of PD;
- appointment of a person responsible for ensuring the security of PD;
- adoption of local normative acts in the field of processing and protection of PD;
- application of legal, organizational, and technical measures for the protection of PD in accordance with the requirements for the protection of PD;
- implementation of internal control of the compliance of PD processing with the Federal Law "On Personal Data" and normative legal acts adopted in accordance with it, the requirements for the protection of PD, the Organization's policy regarding the processing of PD, as well as the Organization's local normative acts in the field of processing and protection of PD;
- assessment of the harm that may be caused to PD subjects in the event of violation of the Federal Law "On Personal Data";
- familiarization of persons directly carrying out the processing of PD with the provisions of the legislation of the Russian Federation on PD, including the requirements for the protection of PD, documents defining the policy regarding the processing of PD, and local normative acts on issues of processing personal data;
- application of measures to restore PD modified or destroyed as a result of unauthorized access to them;
- establishment of a prohibition on the transfer of PD via open communication channels beyond the controlled zone without the application of established measures to ensure the security of PD.

4.2. Measures for the protection of personal data

4.2.1. Differentiation of access powers to personal data processed in the personal data information system of the Forum event.

4.2.2. To protect entry to the automated workstation, a login and password are used, individual for each user. The password must contain at least 12 characters, including letters in different cases, digits, and special characters. Protection against unauthorized access is carried out using an information

security tool.

5. ORGANIZATION OF WORK ON PD PROTECTION

5.1. Work on PD protection is organized taking into account the following basic principles:

- an integrated approach to building a PD protection system;
- use of protection tools that do not significantly worsen the main characteristics of the personal data information system;
- ensuring control of the effectiveness of PD protection tools.

5.2 Direct management of work on the creation, operation, and improvement of the PD protection system at the Forum is carried out by the person responsible for ensuring the security of PD.

5.3 The organization of the performance of work on the installation, configuration, and commissioning of software and software-hardware PD protection tools, the development of organizational measures for the protection of PD, and control over the state of the PD protection system in the personal data information system of the Forum event is assigned to the person responsible for ensuring the security of personal data.

6. CONTROL OVER COMPLIANCE WITH THE REQUIREMENTS OF THE LEGISLATION OF THE RUSSIAN FEDERATION REGARDING THE PROCESSING OF PD

6.1 Control over compliance with the requirements of the legislation of the Russian Federation in the field of PD is carried out for the purpose of:

- verifying the compliance of PD processing with these requirements;
- verifying the compliance of the applied measures for the protection of PD with these requirements;
- taking measures aimed at identifying and preventing violations of these requirements;
- identifying possible channels of PD leakage;
- eliminating the consequences of possible violations. Control over compliance with the requirements of the legislation of the Russian Federation in the field of PD processing is assigned to the person responsible for organizing the processing of PD.

7. CONTROL OF THE STATE OF PD PROTECTION

7.1 Control of the state of PD protection is carried out for the purpose of timely detection and prevention of unauthorized access to PD, deliberate software and technical impacts on PD, and

assessment of the effectiveness of their protection.

7.2 Control consists in verifying the implementation of legal, legislative, and normative acts on issues of PD protection, as well as in assessing the reasonableness and effectiveness of the adopted PD protection measures.

7.3 Based on the results of control, an assessment of the effectiveness of the adopted PD protection measures is given. The protection of PD is considered effective if the measures taken comply with the established requirements and norms. Non-compliance of measures with the established requirements and norms for the protection of PD is a violation. The results of the analysis of periodic control, the established causes of violations, and recommendations for their elimination serve as the basis for making appropriate decisions.