Appendix No. 1 to the Order No. OMF-21-10.21 dated 15.10.2021 of the General Director of Online Microfinance LLC

## THE PERSONAL DATA PROCESSING POLICY OF ONLINE MICROFINANCE LIMITED LIABILITY COMPANY

Moscow, 2021

#### **1 GENERAL PROVISIONS**

The Personal Data Processing Policy of Online Microfinance LLC (hereinafter referred to as the Policy) has been developed in accordance with:

- Federal Law No. 152-FZ as of 27.07.2006 on Personal Data (hereinafter referred to as the federal law),

- Decree of the Government of the Russian Federation No. 1119 as of 01.11.2012 on Approval of the Requirements to Personal Data Protection in the course of its Processing in Personal Data Information Systems,

- Decree of the Government of the Russian Federation No. 687 as of 15.09.2008 on Approval of the Statute on Special Aspects of Personal Data Processing without the Automation Technology

- other regulatory legal acts about personal data.

This Policy defines the basic principles, conditions, goals and methods of personal data processing, the functions of Online Microfinance LLC in the personal data processing, the rights of personal data subjects, as well as the implemented requirements for personal data protection.

The provisions of the Policy serve as the basis for the development of local regulations regulating the personal data processing of employees of Online Microfinance LLC and other personal data subjects in Online Microfinance LLC.

The information constituting personal data in Online Microfinance LLC is any information relating directly or indirectly to a specific or identifiable individual (subject of personal data).

Personal data is confidential, strictly protected information and they are subject to all the requirements established by the internal documents of Online Microfinance LLC for the protection of confidential information.

This Policy is an internal document of Online Microfinance LLC, publicly available and subject to posting on the official website of Online Microfinance LLC on the Internet.

In order to implement the provisions of the Policy of Online Microfinance LLC, local regulations and other documents regulating the personal data processing in Online Microfinance LLC are being developed, including the regulation on the personal data processing, the regulation on ensuring the security of personal data, the regulation on the delimitation of access

rights to the personal data processing, the list of positions and third parties with access to personal data.

#### 2. TERMS AND DEFINITIONS

**Personal data (PD)** means any information relating directly or indirectly to a specific or identifiable individual (subject of personal data).

**Personal data processing** means any action (operation) or a set of actions (operations) with personal data performed with or without automation tools. Processing of personal data includes, inter alia, collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

**Publicly available personal data** means personal data, access to which is granted to an unlimited number of persons with the consent of the subject of personal data or which, in accordance with federal laws, is not subject to the requirement of confidentiality.

**Online Microfinance LLC** means the operator, independently or jointly with other persons organizing and (or) processing personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.

Automated processing of personal data means processing of personal data by means of computer technology;

**Provision of personal data** means actions aimed at disclosing personal data to a certain person or a certain circle of persons;

**Dissemination of personal data** means actions aimed at disclosure of personal data to an indefinite circle of persons.

**Blocking of personal data** means temporary termination of personal data processing (except in cases where processing is necessary to clarify personal data);

**Use of personal data** means actions (operations) with personal data performed by the Operator for the purpose of making decisions or performing other actions that generate legal consequences against the subject of personal data or other persons or otherwise affect the rights and freedoms of the subject of personal data or other persons.

**Depersonalization of personal data** means actions that make impossible to determine the identity of personal data to a specific personal data subject without using additional information;

**Destruction of personal data** means actions that make impossible to restore the content of personal data in the information system of personal data of individuals or the personal data material carriers of the subjects are destroyed.

**Responsible for the processing of personal data** means an employee of Online Microfinance LLC, appointed by the order of the General Director of Online Microfinance LLC, who ensures security, protection and compliance with the requirements of current legislation when processing personal data.

**Personal Data Information System (PDIS)** means the information system, which is a set of personal data contained in a database, as well as information technologies and technical means that allow the processing of personal data with or without the use of automation tools.

**Subject of personal data** means an individual who is directly or indirectly identified or identifiable by personal data.

**Cross-Border Personal Data Transfer** means transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

**Personal Data confidentiality** means mandatory requirement for the Operator or other person who has access to personal data not to allow their dissemination without the consent of the subject of personal data or the presence of other legal grounds.

## 3. PRINCIPLES AND CONDITIONS OF PERSONAL DATA PROCESSING

#### 3.1. Principles of personal data processing

3.1.1. Online Microfinance LLC, being the operator of personal data, processes personal data of the subjects of personal data on the basis of the following principles:

- legality and fairness of the purposes and methods of personal data processing;
- limiting the processing of personal data to the achievement of specific, predetermined and legitimate goals;
- prevention of personal data processing incompatible with the purposes of personal data collection;
- prevention of combining databases containing personal data, the processing of which is carried out for purposes incompatible with each other;
- processing only those personal data that meet the purposes of its processing;
- compliance of the content and volume of the processed personal data with the stated processing purposes;
- prevention of the personal data processing that is excessive in relation to the stated purposes of its processing;
- ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of personal data processing;
- storage of personal data in a form that allows determining the subject of personal data for no longer than the purposes of its processing require, unless the period of storage of personal data is established by the federal law, an agreement which has the subject of personal data as a party, beneficiary or guarantor;
- destruction of personal data upon achievement of the purposes of its processing or in case of loss of the need to achieve these goals, unless otherwise provided by the federal law.

#### 3.2. Conditions of personal data processing

3.2.1. The personal data processing in Online Microfinance LLC is carried out with the consent of the subject of personal data to his personal data processing, unless otherwise provided by the legislation of the Russian Federation about personal data.

3.2.2. Online Microfinance LLC does not disclose or distribute personal data to third parties without the consent of the personal data subject, unless otherwise provided by the federal law.

3.2.3. Online Microfinance LLC has the right to entrust the personal data processing to another person with the consent of the subject of personal data on the basis of an agreement concluded with this person. The contract must contain a list of actions (operations) with personal data that will be performed by the person processing personal data, the purposes of processing, the obligation of such a person to respect the confidentiality of personal data and ensure the security of personal data during its processing, as well as requirements for the protection of processed personal data in accordance with the federal law.

3.2.4. For the purposes of internal information support, Online Microfinance LLC creates internal reference materials, in which, with the written consent of the subject of personal data, unless otherwise provided by the legislation of the Russian Federation, the personal data of the subject of personal data are included.

3.2.5. The access to personal data processed in Online Microfinance LLC is allowed only to employees of Online Microfinance LLC in accordance with the list of positions that have access to personal data.

3.2.6. The terms of processing of personal data of subjects should not exceed the terms that are necessary for the purposes of processing personal data, unless another term is established by the federal law, an agreement to which the subject of personal data is a party.

3.2.7. The processed personal data is subject to destruction upon achievement of the processing goals or in case of loss of the need to achieve these goals, unless otherwise provided by the federal law.

## 4. PURPOSES AND FUNCTIONS FOR THE PERSONAL DATA PROCESSING OF ONLINE MICROFINANCE LLC

#### 4.1. Purposes of personal data processing

4.1.1. Personal data is processed in Online Microfinance LLC for the purposes of:

- ensuring compliance with legislative and other regulatory legal acts of the Russian Federation, local regulations of Online Microfinance LLC;

- regulation of labor relations with the employees of Online Microfinance LLC;

- performing the functions, powers and duties assigned by the legislation of the Russian Federation, including providing personal data to the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Compulsory Medical Insurance Fund, as well as other state bodies;

- protection of life, health or other vital interests of personal data subjects;

- preparation, conclusion, execution and termination of contracts with counterparties;

- formation of reference materials for internal information support;

- execution of judicial acts, acts of other bodies or officials subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;

- exercising the rights and legitimate interests of Online Microfinance LLC within the framework of the activities provided for by the Charter and other local regulations of Online Microfinance LLC, or third parties;

- other legitimate purposes.

# 4.2. Functions of Online Microfinance LLC in the personal data processing

4.2.1. While processing personal data, Online Microfinance LLC:

- takes measures necessary and sufficient to ensure compliance with the requirements of the legislation of the Russian Federation, regulatory legal acts about personal data and local regulations of Online Microfinance LLC;

- appoints the person responsible for organizing the personal data processing in Online Microfinance LLC;

- issues local regulations defining the policy of Online Microfinance LLC regarding the processing of personal data and issues of personal data processing, establishing procedures aimed at preventing and detecting violations of the legislation of the Russian Federation, eliminating the consequences of such violations;

- takes legal, organizational and technical measures to protect personal data from unauthorized or accidental access to it, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions with respect to personal data;

- provides introducing of employees of Online Microfinance LLC directly engaged in the processing of personal data into the provisions of the legislation of the Russian Federation on personal data, including requirements for the protection of personal data, documents defining the policy of Online Microfinance LLC regarding the processing of personal data, local acts on the personal data processing and (or) training of these employees;

- informs the subjects of personal data or their representatives in accordance with the established procedure about the availability of personal data related to the relevant subjects, provides an opportunity to familiarize with these personal data when contacting and (or) receiving requests from these personal data subjects or their representatives, unless otherwise established by the legislation of the Russian Federation;

- stops processing and destroys personal data in cases stipulated by the legislation of the Russian Federation about personal data;

- performs other actions stipulated by the legislation of the Russian Federation about personal data.

## 5. LIST OF THE SUBJECTS OF PERSONAL DATA PROCESSED IN ONLINE MICROFINANCE LLC

5.1. Online Microfinance LLC processes personal data of the following categories of subjects:

- employees;
- dismissed employees;
- family members of employees;
- job seekers;
- counterparties individuals and individual entrepreneurs;

- contact persons of partners of legal entities;
- specialists of individuals engaged to provide services;
- persons whose personal data is processed by Online Microfinance LLC on behalf of third parties on the basis of an agreement with third parties;
- representatives of legal entities;
- customers, visitors and users of idfeurasia.com and other information resources (websites, applications) of Online Microfinance LLC;
- representatives of individuals;
- affiliated entities;
- beneficiaries;
- office visitors;
- other subjects of personal data in accordance with the local regulations of Online Microfinance LLC to ensure the implementation of the processing purposes specified in paragraph 4.1 of the Policy.

#### 6. LIST OF PERSONAL DATA PROCESSED BY Online Microfinance LLC

6.1. The list of personal data processed by Online Microfinance LLC is determined in accordance with the local regulations of Online Microfinance LLC, taking into account the purposes of personal data processing.

6.2. Online Microfinance LLC does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, intimate life.

6.3. Online Microfinance LLC processes special categories of PD related to health status.

6.3.1. Processing of the specified category of PD is carried out within the personnel work in accordance with the requirements of clause 2.3, Part 2, Article 10 of the Law on Personal Data.

## 7. LIST OF ACTIONS WITH PERSONAL DATA AND METHODS OF ITS PROCESSING

7.1. Online Microfinance LLC collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distribution, provision, access), depersonalizes (in accordance with legal requirements), blocks, deletes, and destroys personal data.

7.2. The personal data processing is carried out in the following ways:

- non-automated personal data processing;

- automated processing of personal data with or without transmission of the received information via or Internet;

- mixed personal data processing.

#### 8. RIGHTS OF THE SUBJECT OF PERSONAL DATA

# 8.1. Consent of the personal data subject to the processing of his personal data

8.1.1. The subject of personal data decides on the provision of his personal data and consents to its processing freely, of his own free will and in his own interest. The consent to the personal data processing may be given by the subject of personal data or his representative in any form that allows to confirm the fact of its receipt, unless otherwise established by the federal law.

#### 8.2. Rights of the subjects of personal data

8.2.1. The subject of personal data has the right to:

- get the information from Online Microfinance LLC concerning the processing of his personal data, if such right is not restricted in accordance with federal laws;

- confirm the fact of PD processing by Online Microfinance LLC;

- get the information about the legal grounds and purposes of the PD processing;

- get the information about the methods of the PD processing used by Online Microfinance LLC;

- get the information about the name and location of Online Microfinance LLC, information about persons (with the exception of employees of Online Microfinance LLC) who have access to the PD or to whom the PD may be disclosed on the basis of an agreement with Online Microfinance LLC or on the basis of the federal law;

- the requirement of a list of their personal data processed in Online Microfinance LLC and the source of their receipt;

- get the information about the Cross-Border Personal Data Transfer that has been carried out or is expected to be carried out;

- access to his personal data, including the right to receive a copy of any record containing his personal data, except in cases provided for by the federal law;

- clarification of his personal data, its blocking or destruction if the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing;

- take legal measures to protect his rights;

- revoke the consent to the personal data processing;

- appeal against the actions or omissions of Online Microfinance LLC, carried out in violation of the requirements of the legislation of the Russian Federation about personal data, to the Authorized Body for the Protection of the rights of personal Data subjects or in court;

In order to exercise their rights and protect their legitimate interests, the subjects of personal data have the right to apply to Online Microfinance LLC. Online Microfinance LLC considers any appeals and complaints from the subjects of personal data, thoroughly investigates the facts of violations and takes all necessary measures to eliminate them immediately, punish the perpetrators and settle disputes and conflict situations in a pre-trial manner.

If a subject of personal data believes that Online Microfinance LLC processes his personal data in violation of the requirements of Federal Law No. 152-FZ as of 27.07.2006 on Personal Data or otherwise violates his rights and freedoms, the subject of personal data has the right to appeal the actions or Online Microfinance LLC to the body for the protection of the rights of the subject of personal data or in court. The subject of personal data has the right to protect his legitimate rights and interests, including compensation for damages and (or) compensation for moral damage in court.

## 9. MEASURES TAKEN TO ENSURE THE FULFILLMENT OF THE OPERATOR'S OBLIGATIONS IN THE PERSONAL DATA PROCESSING

9.1. While processing personal data Online Microfinance LLC takes all necessary legal, organizational, and technical measures to protect them from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution, as well as from other illegal actions against them.

9.2. To ensure the fulfillment of the operator's obligations stipulated by the legislation of the Russian Federation about personal data, Online Microfinance LLC takes the following measures:

- physical protection of premises where personal data is processed;

- appointment of the person responsible for the organization of personal data processing in Online Microfinance LLC;

- adoption of local regulations and other documents on the processing and protection of personal data;

- introduction of employees of Online Microfinance LLC directly engaged in the personal data processing into the provisions of the legislation of the Russian Federation on personal data,

including requirements for the protection of personal data, local regulations and other documents of Online Microfinance LLC on the personal data processing;

- obtaining the consent of the subjects of personal data to the processing of their personal data, except in cases provided for by the Russian Federation;

- separation of personal data processed without the automation tools from other information;

- ensuring separate storage of personal data and their material carriers, the processing of which is carried out for different purposes and which contain different categories of personal data;

- storage of material carriers of personal data in compliance with the conditions that ensure the safety of personal data and exclude unauthorized access to it;

- implementation of internal control of compliance of personal data processing with the federal law on Personal Data and regulatory legal acts adopted in accordance with it, requirements for personal data protection, this Policy, local regulations of Online Microfinance LLC;

- distribution of responsibilities for the provision and implementation of protection measures between structural units;

Ensuring the security of personal data is achieved, in particular, by creating a personal data protection system based on the following principles:

- identification of threats to the security of personal data during its processing in the information systems of the subjects of personal data;

- application of organizational and technical measures to ensure the security of the subjects of personal data during its processing in personal data information systems necessary to meet the requirements for the protection of personal data of subjects, the implementation of which ensures the levels of personal data protection established by the Government of the Russian Federation;

- use of information security tools that have passed the compliance assessment procedure in accordance with the established procedure;

- assessment of the effectiveness of the measures taken to ensure the security of personal data prior to the commissioning of the personal data information system;

- taking into account machine-based personal data carriers;

- detection of unauthorized access to personal data and taking measures;

- recovery of personal data modified or destroyed due to unauthorized access to it;

- making rules for access to personal data processed in the personal data information system, as well as ensuring registration and accounting of all actions performed with personal data in the personal data information system;

- control over the measures taken to ensure the security of personal data and the level of security of personal data information systems.

- application of other measures provided for by the legislation of the Russian Federation about personal data.

## 10. OBLIGATIONS OF THE OPERATOR UPON REFERRAL OF THE SUBJECT OF PERSONAL DATA OR UPON RECEIVING A REQUEST FROM THE SUBJECT OF PERSONAL DATA OR HIS REPRESENTATIVE, AS WELL AS THE AUTHORIZED BODY FOR THE PROTECTION OF THE RIGHTS OF THE SUBJECTS OF PERSONAL DATA

10.1. Online Microfinance LLC is obliged to inform the subject of personal data or his representative about the availability of personal data related to the relevant subject of personal data as well as provide an opportunity to get acquainted with these personal data when the subject of personal data or his representative applies or within thirty days from the date of receipt of the request of the subject of personal data or his representative.

10.2. In case of refusal to provide information about the availability of personal data about the relevant subject of personal data or personal data to the subject of personal data or his representative upon their request or upon receipt of a request from the subject of personal data or his representative, Online Microfinance LLC is obliged to give a reasoned response in writing, containing a reference to the legislation that is the basis for such refusal, within the deadline, not exceeding thirty days from the date of the request of the subject of personal data or his representative or from the date of receipt of the request of the subject of personal data or his representative.

10.3. Online Microfinance LLC is obliged to provide free of charge to the subject of personal data or his representative the opportunity to get acquainted with personal data related to this subject of personal data.

Within a period not exceeding seven working days from the date of submission by the subject of personal data or his representative of information confirming that personal data is incomplete, inaccurate, or irrelevant, Online Microfinance LLC is obliged to make the necessary changes to it. Within a period not exceeding seven working days from the date of submission by the subject of personal data or his representative of information confirming that such personal data are illegally obtained or are not necessary for the stated purpose of processing, Online

Microfinance LLC is obliged to destroy such personal data. Online Microfinance LLC is obliged to the subject of personal data, or his representative of the changes made, and the measures taken and to take reasonable measures to notify third parties to whom this subject's personal data has been transferred.

10.4. Online Microfinance LLC is obliged to inform the authorized body for the protection of the rights of the subjects of personal data at the request of this body of the necessary information within thirty days from the date of receipt of such a request.

The specified information must be provided to the subject of personal data by Online Microfinance LLC in an accessible form, and they must not contain personal data related to other subjects of personal data, except in cases where there are legitimate grounds for disclosure of such personal data. Online Microfinance LLC may also provide the subject with his personal data in machine-readable format, considering the format in which they are stored in the information system.

Online Microfinance LLC has introduced documents defining the procedure for processing requests from subjects of personal data, the procedure for interaction with the authorized body for the protection of the rights of subjects of personal data and organized the registration of requests and demands in the relevant accounting journals.

## 11. OBLIGATIONS OF THE OPERATOR TO ELIMINATE VIOLATIONS OF THE LAW COMMITTED DURING THE PERSONAL DATA PROCESSING, TO CLARIFY, BLOCK AND DESTROY PERSONAL DATA

11.1. In case of detection of unlawful processing of personal data when the subject of personal data or his representative is contacted, or at the request of the subject of personal data or his representative or the authorized body for the protection of the rights of subject of personal data, Online Microfinance LLC is obliged to block the unlawfully processed personal data related to this subject of personal data, or to ensure its blocking (if the personal data is processed by another person acting on behalf of Online Microfinance LLC) from the moment of such a request or receipt of the specified request for the verification period. In case of identification of inaccurate personal data when contacting by a subject of personal data related to this subjects of personal data, Online Microfinance LLC is obliged to block personal data related to this subjects of personal data, or ensure their blocking (if the personal data related to this subjects of personal data, or ensure their blocking (if the personal data related to this subject of personal data, or ensure their blocking (if the personal data related to this subject of personal data, or ensure their blocking (if the personal data is processed by another person acting on behalf of Online Microfinance LLC) from the moment of such a request or receipt of the specification period, if the blocking of personal data does not violate the rights and legitimate interests of the subject of personal data or third parties.

11.2. In case of confirmation of the inaccuracy of personal data, Online Microfinance LLC, based on the information provided by the subject of personal data or his representative or the authorized body for the protection of the rights of subjects of personal data, or other necessary

documents, is obliged to clarify personal data or ensure its clarification (if the personal data is processed by another person acting on behalf of Online Microfinance LLC) within seven working days from the date of submission of such information and remove the blocking of personal data.

11.3. In case of detection of illegal processing of personal data (including illegal distribution and provision of data) carried out by Online Microfinance LLC or by a person acting on behalf of Online Microfinance LLC, Online Microfinance LLC, within a period not exceeding three working days from the date of this detection, is obliged to stop the illegal processing of personal data or ensure the termination of illegal processing of personal data by a person acting on behalf of Online Microfinance LLC. If it is impossible to ensure the legality of the personal data processing, Online Microfinance LLC is obliged to destroy such personal data or ensure its destruction within a period not exceeding ten working days from the date of detection of unlawful personal data processing. Online Microfinance LLC is obliged to notify the subject of personal data or his representative about the elimination of violations or the destruction of personal data, and if the request of the subject of personal data or his representative or the protection of the rights of subjects of personal data was sent by the authorized body for the protection of the rights of subjects of personal data, also the specified body.

11.4. If the purpose of personal data processing is achieved, Online Microfinance LLC is obliged to stop processing personal data or ensure its termination (if the personal data is processed by another person acting on behalf of Online Microfinance LLC) and destroy personal data or ensure its destruction (if the personal data is processed by another person acting on behalf of Online Microfinance LLC) within a period not exceeding thirty days from the date of achievement of the purpose of personal data processing, unless otherwise provided by the contract, the party, beneficiary or guarantor of which is the subject of personal data, other agreement between the subject of personal data and Online Microfinance LLC or if Online Microfinance LLC is not entitled to process personal data without the consent of the subject of personal data or of the subject of personal data or of the subject of personal data mithout the consent of the subject of personal data or process personal data without the consent of the subject of personal data or of the subject of personal data or of the subject of personal data mithout the consent of the subject of personal data on the grounds provided for by the legislation of the Russian Federation.

11.5. If the subject of personal data revokes consent to the processing of his personal data, Online Microfinance LLC is obliged to terminate its processing or ensure the termination of such processing (if the personal data is processed by another person acting on behalf of Online Microfinance LLC) and if the storage of personal data is no longer required for the purposes of personal data processing, destroy personal data or ensure its destruction (if the personal data is processed by another person acting on behalf of Online Microfinance LLC) within the time limit, not exceeding thirty days from the date of receipt of the specified recall, unless otherwise provided by the contract, the party to which, the beneficiary or the guarantor of which is the subject of personal data, another agreement between Online Microfinance LLC and the subject of personal data, or if Online Microfinance LLC is not entitled to process personal data without the consent of the subject of personal data on the grounds provided for by the legislation of the Russian Federation.

11.6. If there is no possibility of destruction of personal data within the period specified in paragraphs 11.3–11.5 of the Policy, Online Microfinance LLC blocks such personal data or ensures its blocking (if the personal data is processed by another person acting on behalf of Online Microfinance LLC) and ensures the destruction of personal data within a period of no

more than six months, unless another period is established by the legislation of the Russian Federation.

#### **12. CROSS-BORDER PERSONAL DATA TRANSFER**

Online Microfinance LLC carries out the Cross-Border Personal Data Transfer in accordance with the requirements of the current legislation of the Russian Federation.

Cross-Border Personal Data Transfer on the territory of foreign states that are parties to the Convention for the Protection of Individuals with Regard to Automatic Processing of Personal Data of the Council of Europe as well as other foreign states that provide adequate protection of the rights of subjects of personal data, is carried out in accordance with the requirements of the current legislation of the Russian Federation.

Cross-Border Personal Data Transfer on the territory of foreign states that do not provide adequate protection of the rights of subjects of personal data is carried out in accordance with the requirements of the current legislation of the Russian Federation.

## **13. LOCATION OF DATABASES OF INFORMATION CONTAINING PERSONAL DATA OF CITIZENS OF THE RUSSIAN FEDERATION**

When collecting personal data, including via Internet, Online Microfinance LLC provides recording, systematization, accumulation, storage, clarification (updating, modification), extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation.

#### **14. RESPONSIBILITY**

Violation of the rules governing the receipt, processing and protection of personal data may entail civil, criminal, administrative, disciplinary and other liability provided for by the legislation of the Russian Federation.

#### **15. FINAL PROVISIONS**

This Policy of Online Microfinance LLC, as well as all its amendments, are approved by the order of Online Microfinance LLC and come into force from the moment of approval.

The questions of interpretation of this Policy of Online Microfinance LLC should be addressed to the person responsible for processing personal data of Online Microfinance LLC.

The current version of the Policy of Online Microfinance LLC is stored at the address of the executive body of Online Microfinance LLC.