

Policy of CENTURY DYNAMICS LLC regarding the collection, processing and protection of personal data of subscribers

Revision of 01.01.2025

CENTURY DYNAMICS LLC (hereinafter referred to as the Company) appreciates the trust that you place in us by providing your personal data, and takes all necessary technical, organizational and legal measures to protect them. In order to find out what personal data we collect, how we process and protect it, please carefully read this Policy of the Company regarding the collection, processing and protection of personal data of subscribers (hereinafter referred to as the Policy).

1. Terms and Definitions

1.1. Unless otherwise expressly provided in the text, the following terms shall have the appropriate meanings:

"MaCloud" - Limited Liability Company "CENTURY DYNAMICS", TIN 9728147238, address: 119421, Moscow, Internal Territorial District, Obruchevsky Municipal District, Leninsky Ave., 111, building 1, room 51A/N/Z, company website: www.macloud.pro

"Customers" are individuals and legal entities that are in a civil contract with MaCloud. legal relations to which MaCloud provides services and works.

"Law on Personal Data" means the Law of the Russian Federation, dated July 27, 2006 No 152-FZ.

"Personal Data" means any information relating directly or indirectly to the User, Customer, Applicant and provided within the framework of the Policy, processed in accordance with the Law on Personal Data.

"Policy" means this policy for processing personal data.

"User" means individuals, including representatives of legal entities, using the Website.

"Employees" means individuals who are or have been in an employment relationship with MaCloud.

"Website" means a website on the Internet available at <https://www.macloud.pro>.

"Job Seekers" means individuals who apply or have applied for MaCloud jobs.

"Services" means the services provided by MaCloud.

1.2. Terms not defined in this Policy shall be interpreted in accordance with the legislation of the Russian Federation (primarily the Law on Personal Data).

1.3. Use of the Website means the User's consent to the Policy.

2. Composition of processed data

2.1. With respect to Employees, Users, Customers and their representatives, MaCloud processes only Personal Data that:

(a) Provided to MaCloud by the data subjects themselves by filling out forms posted on the Website, which include the following data:

- Name
- Surname
- Email
- Telephone number
- Other documents included in the documents attached to the forms (if the personal data subject has used this option);

(b) Provided to MaCloud by the data subjects themselves in the following ways:

- By phone number
- By e-mail
- By filling out forms
- By attaching documents to the application forms on the Website
- By sending original documents to the postal address
- In other ways;

(c) Received by MaCloud from other persons with the consent of personal data subjects;

(d) Posted in the public domain by the personal data subject or with his consent;

(e) Transferred by registering in your personal account on the Website.

2.2. With respect to Job Seekers, MaCloud processes:

- (a) Information provided by the Applicant through the form on the Website or in the questionnaire;
- (b) Information contained in the resume submitted by the Applicant (full name, position, address, phone number, personal email address, date of birth, gender, qualification information and other data);
- (c) Certain data that may come from recruitment consultants, recruitment agencies or background check agencies (contact details, biographical data). MaCloud does not process criminal records of Job Seekers. Information about the Applicant's health may be processed to the extent necessary to assess the need to create the necessary conditions for the Applicant's work.

2.3. During each visit to the Website, the following information about the Users of the Website is automatically collected:

- (a) Technical information stored in cookies that have been sent to your device (including IP address, access data, browser type and version, time zone settings, browser type and version, operating system);
- (b) Information about visits to the Website (including URLs, history of transitions to the Website, to other resources and back, search queries, page response time and loading errors, duration of visits to individual pages, information about interaction with the page).

2.4. MaCloud processes Personal Data from the moment it is received and for as long as necessary to achieve the purpose of the processing.

3. Cookie

We use cookies. A cookie is a small file of letters and numbers that we store on a user's browser or on their computer's hard drive, if they agree. Cookies contain information that is transferred to the user's hard drive.

3.1. Types of cookies and how we use them.

We regularly scan cookies on our website and update our cookie list. We classify cookies into five categories:

- 1) Essential cookies. These are cookies that are necessary for the operation of our website. These include, for example, cookies that allow website visitors to log in to secure areas of our website, use the shopping cart or use electronic payment services.
- 2) Analytical/Cookie Performance. They allow us to recognize and count the number of visitors and see how visitors move around our website when using it. This helps us to improve the way our website works, for example, by ensuring that users easily find what they are looking for.
- 3) Cookie Preferences. They are used to recognize users when they return to our website. This allows us to personalize our content for them and remember their preferences (e.g. their choice of language or region).
- 4) Advertising cookies. These cookies record users' visits to our website, the pages they visited and the links they followed. We will use this information to make our website and the advertisements displayed on it more relevant to the interests of visitors to our website.
- 5) Remarketing cookies. These cookies help us to make our products and services known to more people, as well as to measure the effectiveness of marketing campaigns.

Depending on the user's location, they will be able to refuse each category of cookies (except for essential cookies) by clicking on "set user permission" in the cookie banner on our website.

Name	Type	Description	Shelf life	Provider	Reference
_PHPSESSID	Required	This is a general-purpose identifier used to store user session variables.	7 days		
_ga	Analytical	It allows you to distinguish users, is used to identify the visitor and is updated with each new interaction with the site.	1 year	Google Analytics	analytics.google.com
_gid	Analytical	Stores and counts page views.	24 hours	Google Analytics	analytics.google.com
_gat	Analytical	Limits the number of requests.	1 minute	Google Analytics	analytics.google.com
cid	Analytical	Installs Google Analytics ClientID	1 year	Google Analytics	analytics.google.com
_ym_d	Analytical	Stores the date of the visitor's first visit to the site	1 year	Yandex.Metrica	metrica.yandex.com
_ym_isad	Analytical	Used to determine if a visitor has ad blockers	2 days	Yandex.Metrica	metrica.yandex.com
yandexuid	Analytical	Allows you to distinguish between visitors	1 year	Yandex.Metrica	metrica.yandex.com
yuidssc	Analytical	Allows you to distinguish between visitors	1 year	Yandex.Metrica	metrica.yandex.com
yabs-sid	Analytical	Allows you to distinguish between visitors	1 year	Yandex.Metrica	metrica.yandex.com
ymex	Analytical	Stores auxiliary information for the operation of Yandex.Metrica: the time of creation of identifiers and their alternative values	1 year	Yandex.Metrica	metrica.yandex.com
_gcl_au	Advertising	Uses Google AdSense to experiment with ad performance on websites that use their services.	3 months	Google AdSense	adsense.google.com
_fbp	Advertising	Used by Facebook to provide a range of advertising products, such as real-time bidding from third-party advertisers.	3 months	Facebook	developers.facebook.com

_IDE	Advertising	This cookie is used to target, analyze and optimize advertising campaigns in DoubleClick/Google Marketing Suite.	1 year	Google Marketing Suite	marketingplatform.google.com
AT	Remarketing	Passing parameters to the remarketing code	1 year	Mail.ru	mail.ru
tmr_lvid	Remarketing	Used to track the user's interaction with the website	1 year	Mail.ru	mail.ru
tmr_lvidTS	Remarketing	Used to track the user's interaction with the website	11 months	Mail.ru	mail.ru
tmr_detect	Remarketing	Used to track the user's interaction with the website	11 months	Mail.ru	mail.ru
mindboxDeviceUUID	Remarketing	Unique identifier of the browser	1 year	Mindbox	mindbox.net

4. Principles and bases of processing

4.1. The processing of Personal Data is carried out by MaCloud in accordance with the principles of:

- (a) The legality of the purposes and methods of processing Personal Data;
- (b) Compliance of the purposes of Personal Data processing with the purposes predetermined and stated when collecting Personal Data;
- (c) Compliance of the volume and nature of the processed Personal Data, methods of their processing with the purposes of Personal Data processing;
- (d) Accuracy and relevance of Personal Data, their sufficiency for the purposes of processing, inadmissibility of processing Personal Data redundant in relation to the purposes stated when collecting Personal Data;
- (e) Inadmissibility of combining databases containing Personal Data created for incompatible purposes.

4.2. The legal basis for the processing of MaCloud Personal Data is:

- (a) Constitution of the Russian Federation;
- (b) Civil Code of the Russian Federation;
- (c) Code of Administrative Responsibility of the Russian Federation;
- (d) Labor Code of the Russian Federation;
- (e) Criminal Code of the Russian Federation;
- (f) Local regulations governing MaCloud's activities;
- (g) MaCloud's founding documents.

4.3. Unless the processing of Personal Data is expressly provided for in regulatory enactments, MaCloud will only process Personal Data if:

- (a) The consent of the personal data subject to the processing of his/her MaCloud Personal Data has been obtained (including if such consent has been obtained by another person);
- (b) The processing of Personal Data is necessary for the performance of a contract to which the personal data subject is a party;
- (c) The processing of Personal Data is necessary to conclude an agreement at the initiative of the personal data subject or an agreement under which the personal data subject will be a beneficiary or guarantor;

- (d) The processing of Personal Data is necessary for the exercise of the rights and legitimate interests of MaCloud or third parties;
- (e) The processing of Personal Data is carried out for statistical or other research purposes, subject to the mandatory depersonalization of MaCloud Personal Data;
- (f) Access of an unlimited number of persons to the processed Personal Data is provided by the personal data subject or at his request.

5. Purposes of processing

5.1. The personal data of different categories of data subjects is processed by MaCloud for different purposes. Where a data subject falls into more than one category, their Personal Data may be processed for purposes specific to each category.

5.2. The personal data of the Website Users is processed by MaCloud for the following purposes:

- (a) Consideration of requests from the Website User;
- (b) Analysis of Website traffic statistics;
- (c) Adapting the content of the Site to improve the user experience;
- (d) Demonstration of advertisements and informational advertisements to the Users of the Website;
- (e) Evaluation of the effectiveness of marketing campaigns;
- (f) Site Administration, including troubleshooting, data analysis, testing, and information security.

5.3. The personal data of Customers and their representatives is processed by MaCloud for the following purposes:

- (a) Execution of contracts concluded with Customers;
- (b) Implementation of business contacts with Customers and management of relations with them;
- (c) Consideration of customer requests;
- (d) Sending advertising and informational messages to the Customers;
- (e) Evaluation of the effectiveness of marketing campaigns;
- (f) Ensuring the current business activities of MaCloud (including legal support, accounting, tax and management accounting).

5.4. The personal data of potential Customers and their representatives is processed by MaCloud for the following purposes:

- (a) Negotiating the possibility of concluding contracts with potential Customers, including the identification and assessment of the solvency of potential Customers in order to detect and prevent fraud;
- (b) Implementation of business contacts with potential Customers and management of relations with them;
- (c) Consideration of requests from potential Customers;
- (d) Sending advertising and information messages to potential Customers;
- (e) Evaluating the effectiveness of marketing campaigns.

5.5. Applicants' personal data is processed by MaCloud for the following purposes:

- (a) Consideration of the possibility of concluding an employment or civil law contract with the Applicant;
- (b) Formation of a personnel reserve.

5.6. Employees' personal data is processed by MaCloud for the following purposes:

- (a) Assistance in employment, training and promotion within the MaCloud structure;
- (b) Ensuring personal safety;
- (c) Control and assessment of the volume and quality of work;
- (d) Ensuring the safety of MaCloud property (including the organization of access control, control over the issuance of equipment and access to information owned by MaCloud);
- (e) Organization of Employee Insurance;
- (f) Performance of employment contracts concluded with Employees, including the calculation and payment of wages, other remuneration and compensation;
- (g) Organization of business trips (including assistance to Employees in obtaining foreign passports and foreign visas, purchasing tickets, booking hotels);
- (h) Ensuring the current business activities of MaCloud (including HR records management, legal support, accounting, tax and management accounting);
- (i) Human resources management;
- (j) Compliance with the requirements of Uzbek legislation (including anti-corruption legislation).

5.7. Personal data of Employees' relatives are processed solely to comply with legal requirements.

5.8. On the basis of instructions from third parties, MaCloud may provide them with services related to the processing of Personal Data. In such cases, the processing of Personal Data is carried out solely for the purposes provided for by the relevant instructions of third parties (including by providing third parties with the information technology infrastructure used by them for the processing of Personal Data). The cases and procedure for processing Personal Data on behalf of the Customers are regulated by separate agreements concluded with the Customers.

5.9. The purposes of Personal Data processing specified in this section do not limit MaCloud's right to process data of any categories of data subjects in order to comply with applicable law or protect the rights and protected interests of MaCloud.

5.10. Insofar as these operations are in line with the purposes stated above, Personal Data may be processed by MaCloud both with and without automation tools through their collection, systematization, accumulation, storage, clarification, use, blocking, transfer and destruction.

6. Transfer of Personal Data

6.1. Personal data of any category of personal data subjects may be transferred to MaCloud:

- (a) Business partners, suppliers and subcontractors involved in the provision of the Services, if applicable;
- (b) Information technology service providers, including information system operators, technical support service providers, if applicable;
- (c) Analytics service providers and search engine operators who assist MaCloud in improving and optimizing MaCloud services, if applicable;

- (d) Individuals with whom MaCloud enters into transactions to acquire or sell all or a portion of the business, if applicable.
- 6.2. In the event that Personal Data is transferred to third parties, MaCloud notifies these parties of the obligation to maintain the confidentiality of Personal Data and to use it only for the purposes for which it was transferred.
- 6.3. The provision of Personal Data to government authorities is carried out in accordance with the requirements of applicable law.
- 6.4. MaCloud does not transfer Personal Data in foreign countries.

7. Storage and protection of Personal Data

- 7.1. Personal data is stored in locked and guarded premises. In the event of potential uncontrolled access to the premises by persons who do not have the right to access the Personal Data carriers stored therein, paper and electronic media containing Personal Data shall be stored in locked cabinets (boxes, safes). At the same time, conditions are created to ensure their safety and protection from unauthorized access.
- 7.2. When processing Personal Data in electronic form, organizational, legal and technical protection measures are implemented to exclude the possibility of unauthorized access to Personal Data by persons who are not allowed to process them. These measures include, but are not limited to:
 - (a) Modeling threats to the security of Personal Data;
 - (b) Ensuring the security regime of the premises in which the information systems of Personal Data are located;
 - (c) Determination of the list of persons whose access to Personal Data is necessary for the performance of their official duties;
 - (d) Ensuring the safety of Personal Data carriers;
 - (e) Managing access to Personal Data (including the application of password protection measures);
 - (f) Control of the protection of personal data (including control of the installation of software updates);
 - (g) Ensuring the availability of Personal Data (including by backing up Personal Data with a set frequency);
 - (h) Anti-virus protection of personal data information systems.
- 7.3. The transmission of information via the Internet is not completely secure. While MaCloud does its best to protect the Personal Data of Site Users, MaCloud cannot guarantee the security of Personal Data transmitted through the use of the Site. Any such transfer may pose risks to the User of the Website.
- 7.4. Users of the Website, Customers and their representatives are solely responsible for maintaining the confidentiality of access tools (passwords) that allow them to access certain Services.

8. Rights of personal data subjects

8.1. Personal data subjects have the right to:

- (a) Access information relating to the processing of their Personal Data;
- (b) Require MaCloud to update, block or destroy Personal Data if the Personal Data is incomplete, outdated, inaccurate, unlawfully obtained or is not necessary for the stated purpose of processing;
- (c) To appeal to the court against any unlawful actions or omissions of MaCloud in the processing and protection of Personal Data, as well as to take other measures provided for by law to protect their rights.

8.2. The Personal Data Subject has the right to receive information regarding the processing of his/her Personal Data, containing:

- (a) Confirmation of the processing of MaCloud Personal Data;
- (b) Legal grounds and purposes of Personal Data processing;
- (c) MaCloud's processing of Personal Data;
- (d) Name and location of MaCloud, details of persons who have access to Personal Data or to whom Personal Data may be disclosed based on a contract with MaCloud or on the basis of federal law;
- (e) Processed Personal Data relating to the relevant personal data subject, the source of their receipt, unless another procedure for submitting such data is provided for by federal law;
- (f) The terms of processing of Personal Data, including the period of their storage;
- (g) The procedure for the exercise by the personal data subject of the rights provided for by the Law on Personal Data;
- (h) Information on cross-border data transfers;
- (i) Information on the location of the database of information containing Personal Data;
- (j) Name or surname, first name, patronymic and address of the person processing Personal Data on behalf of MaCloud, if the processing is or will be entrusted to such person;
- (k) Other information provided for by the Law on Personal Data or other federal laws.

8.3. Information about the processing of Personal Data shall be provided to the Personal Data Subject or his/her representative upon receipt of a request from the Personal Data Subject or his/her representative. The request must contain:

- number of the main identity document of the personal data subject or his representative;
- information on the date of issue of the said document and the issuing authority;
- information confirming the participation of the personal data subject in relations with MaCloud, or information otherwise confirming the fact of processing of MaCloud Personal Data.

The request must be signed by the personal data subject or his representative.

8.4. If the person who has contacted MaCloud with a request or request is not authorized to receive information relating to Personal Data, the person concerned will not be given such information. A person who has applied with a corresponding request is issued a notice of refusal to issue information.

8.5. Responses to requests and requests for information disclosing the details of the processing of Personal Data are sent within 10 (ten) days from the date of their receipt by MaCloud.

- 8.6. In case of receiving a request containing information about the processing of inaccurate Personal Data by MaCloud or illegal processing of Personal Data, the person responsible for considering the request will immediately arrange for the blocking of such Personal Data for the period of verification. In the event that MaCloud reports that inaccurate Personal Data is being processed, the blocking will be carried out provided that it does not violate the rights and legitimate interests of the data subject or third parties.
- 8.7. In case of confirmation of the fact of inaccuracy of the processed Personal Data on the basis of information provided by the personal data subject, his/her representative or the authorized body for the protection of the rights of personal data subjects, the Personal Data shall be clarified within 7 (seven) business days from the date of submission of such information. If the data cannot be clarified within the specified period, the clarification shall be carried out as soon as possible. Data is unlocked based on the results of its clarification.
- 8.8. In the event that the results of the audit reveal the illegal processing of MaCloud Personal Data, the violation shall be eliminated within a period not exceeding 3 (three) business days from the date of confirmation of the fact of illegal processing. If it is impossible to ensure the lawfulness of the processing of Personal Data, the data shall be destroyed within a period not exceeding 10 (ten) business days from the date of detection of unlawful processing of Personal Data. The personal data subject or his/her representative shall be immediately notified of the elimination of violations or destruction of Personal Data, and if the appeal or request was sent by the authorized body for the protection of the rights of personal data subjects, also of the specified body.
- 8.9. If the personal data subject withdraws consent to the processing of his data, MaCloud employees are obliged to stop processing Personal Data and destroy it within 10 (ten) days. The requirements of this clause shall not apply, unless otherwise provided by the agreement to which the personal data subject is a party, beneficiary or guarantor, or by applicable law.
- 8.10. The subject has the right to ask MaCloud not to process his or her Personal Data for marketing purposes. It is possible to prevent this from being processed by checking certain boxes in the forms used to collect the data support@macloud.pro.

9. Processing time

- 9.1. The terms of Personal Data processing, as a general rule, are determined by the consents given by MaCloud personal data subjects, but in any case, the processing is subject to termination upon achievement of the purposes of processing the relevant data, as well as in the event of termination of the grounds for the processing of Personal Data (including in the event of withdrawal of previously provided consent to the processing of Personal Data).
- 9.2. The processing of data of Website Users, Customers, and their representatives for business contacts, as well as sending additional information about the Services, is carried out until the termination of MaCloud's activities as a legal entity.
- 9.3. The processing of the Applicants' Personal Data is carried out within 5 (five) years from the date of notification of the Applicant about the decision made on his candidacy.

10. Policy Changes

- 10.1. MaCloud may change this Policy from time to time. The User is responsible for reading the text of the Policy each time he visits the Website.
- 10.2. The new version of the Policy comes into force from the moment it is posted on the Website. The User's continued use of the Website after the publication of the new version of the Policy on the Website means the User's acceptance of the Policy and its terms.
- 10.3. In case of disagreement with the terms of the Policy, the User should not use the Website.
- 10.4. Changes to the Policy do not apply retroactively. Information about the date the Policy was last modified is displayed at the beginning of the Policy.
- 10.5. If you discover that your Personal Data is being processed by MaCloud without your consent, you should immediately contact MaCloud via the email address specified in clause 8.10 of the Policy to prevent unauthorized use of your data.

11. Contacts

- 11.1. Questions and comments regarding this Policy may be directed to info@macloud.pro.