

APPROVED

by CEO
of Newton Investments LLC

Order No. Д/100822/1 dd. August 10, 2022

Personal Data Processing and Protection Policy
(Privacy Policy)

Introduction

This Personal Data Processing and Protection Policy (hereinafter referred to as the Privacy Policy or the Policy) explains how Newton Investments LLC processes and protects personal data and other user information.

This Privacy Policy applies to the websites of Newton Investments LLC located at: 2 Novodmitrovskaya St., building 2, Office 15-05, 127015, Moscow, Russian Federation (hereinafter referred to as the Company, Newton Investments or we), which receive personal data from users of <https://newton.investments> and <https://gazprombank.investments> and from users of the Newton Investments application (hereinafter referred to as the App) and which provide a link to this Privacy Policy. This Policy does not apply to the Company's websites that do not contain this Privacy Policy or any link thereto, or to websites that have their own Privacy Policy.

This Privacy Policy contains information about how we process and protect your personal data when you use our websites and the App. We take your privacy seriously. For this reason, we are committed to protecting your personal data during their processing.

If you have any questions or comments about this Privacy Policy or would like to update the information or preferences you have provided to us, please contact us via e-mail pdn@gazprombank.investments or pdn@newton.investments.

This Policy applies to all processes of collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction of personal data performed using automation tools.

The Company processes personal data in accordance with the principles and rules established by Federal Law of the Russian Federation No. 152-ФЗ on Personal Data dd. June 27, 2006.

The Company does not control and is not responsible for third-party websites that the user may access through links provided on the Company's websites. Third-party websites may have their own privacy policy and may collect or request other personal data from you.

By using the services and providing the Company with the information necessary to initiate further interaction, you consent to its use in accordance with this Policy.

For certain services, the Company may publish additional terms that supplement this Policy.

1. General Provisions

1.1. Personal data is any information that is directly or indirectly related to an identified or identifiable individual. Examples of personal data include surname, name, patronymic, email, phone number, and other information. In general, you can visit and read most pages of our websites without providing any personal data.

At the same time, technical information is personal data if it can be associated with an individual. For example, IP address, operating system type, device type (PC, mobile phone, tablet), browser type, geographic location, Internet service provider.

1.2. You understand that the Company will only process the personal data that we receive from you as an individual through our website.

1.3. This document defines the Company's personal data processing and protection policy and is available at <https://newton.investments> and <https://gazprombank.investments>. In addition, the Company provides unrestricted access to the Policy to any person who personally contacts the Company at the address listed in the Introduction.

1.4. The Company processes personal data, including its storage, using servers located in the territory of the Russian Federation.

1.5. The Company does not verify the authenticity of the provided personal data and the legal capacity of the person who provided it. You guarantee that all data is accurate, up-to-date and does not violate the laws of the Russian Federation.

1.6. We do not process special categories of personal data (information about race and ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political preferences, trade-union membership, as well as information about your health status, genetic and biometric data).

2. Purposes of Collection and Processing of Personal Data

2.1. The main purpose of the Company is to ensure the protection of rights and freedoms of a person and citizen when processing his/her personal data, including the protection of the right to privacy, personal and family secrets, clear and strict compliance with the requirements, primarily, of the laws on personal data of the Russian Federation.

2.2. We use personal data to enter into contracts, to provide you with services and technical support, to provide you with valuable information about our products, to process payments and banking transactions, to inform you about promotions and changes in our services, and to set up the sending of promotional offers according to your preferences, including important updates and notifications. For example, if you contact our help desk or email us, we will process the data you provide in the course of such contact.

2.3. The Company is guided by the principles of adequacy, reasonableness and appropriateness when processing personal data. We carry out the processes associated with the processing of personal data in the cases and for the purposes specified in this section.

2.4. Procedures related to the processing of personal data:

- When you access the website: in order to properly perform the Company's obligations to you, to access the website, to register on the website and in all other cases related to this activity.
- When you use the Newton Investments app.
- When communicating with you: at the email address you have provided, in order to communicate with you in a timely manner and to provide you with all necessary accurate and complete information related to the Company's activities, including providing and sending information about the website and promotions arranged by the Company and/or authorized third parties.

- When we receive feedback from you to
 - obtain, research and process loyalty and satisfaction information;
 - analyze how to improve the quality of the website and quality of services; and
 - conduct surveys of any category.
- When ensuring the protection and confidentiality of your personal data – in order to ensure the performance and security of the website, to confirm the actions you perform, to prevent fraud, cyber-attacks and other abuses, and to investigate such cases.

3. List of Personal Data for Processing of Which Consent Is Given

3.1. For the purposes of this Policy, personal data of the user means

- Personal data provided by the user about himself/herself during registration (account creation) on the website(s), while using the services, while using the App. Information that is mandatory for the provision of services is explicitly marked.
- For registered users of the website or the App — persons who have successfully registered on the website, such information includes
 - phone number,
 - e-mail.
- For users who have concluded a contract with the Company for the provision of services, such information includes
 - full name,
 - passport details,
 - date of birth,
 - place of birth,
 - address of registration,
 - address of current residence,
 - INN (if any),
 - citizenship,
 - migration card details,
 - state pension insurance certificate number,
 - position (history of changes),
 - income details,
 - marital status,
 - phone numbers,
 - e-mail,
 - account with lending institutions,
 - payment details,
 - income,
 - information about assets, liabilities and property rights, and
 - information about account balances.

- Information about technical devices: operating system type, device type (PC, mobile phone, tablet), browser type, geographical location, mobile device ID.
- Information obtained as a result of your actions, including the following information:
 - comments sent,
 - requests, and
 - feedback and questions.

4. Legal Ground for Processing Your Personal Data

4.1. Our legal grounds for processing your personal data are as follows:

- the processing of data necessary for the implementation of a contract with the data subject or the performance of actions necessary to conclude the contract;
- ensuring the continued security and proper operation of our websites, the App and related IT systems, and fraud prevention;
- your specific consent to the processing of personal data for the above purposes; and
- processing necessary to comply with legal obligations.

5. Personal Data Processing Principles

5.1. Adequacy is the main principle that we strictly adhere to when processing personal data. Your personal data will not be processed if it is in fact not necessary.

5.2. We also process personal data in accordance with the following principles:

- lawfulness and fairness of the processing of personal data;
- processing of personal data in accordance with specific, predetermined and legitimate purposes;
- preventing the combination of different databases containing personal data, which are processed for incompatible purposes;
- processing only personal data that are relevant to the purposes of the processing;
- accuracy, adequacy, relevance and reliability of personal data;
- lawfulness of technical measures for the processing of personal data;
- reasonableness and appropriateness of the processing of personal data;
- storage of personal data in a form allowing to identify the individual and no longer than required for the purposes of its processing or within the period of consent of the individual.

6. Processing of Personal Data

6.1. Personal data is collected in the following ways:

- provision of your personal data by you when filling in web forms on the websites and in the App;
- transfer of your personal data from public information resources, such as the Public Services Portal, the Unified Identification and Authentication System, the Interdepartmental Electronic Interaction System, etc., subject to your consent;
- automatic collection of information through technologies, services and apps: web logs, cookies, web tags, which that are only activated when you enter your data.

7. Storage of Personal Data

7.1. Personal data is stored exclusively on duly protected media, including electronic media, and is processed with or without automation tools.

7.2. Personal data is stored for the time necessary to implement contracts or agreements for services, consultations, technical support and provision of services.

7.3. The processed personal data shall be destroyed as soon as the purposes of the processing have been achieved or when it is no longer necessary to achieve them.

8. Use of Cookies

8.1. Cookies are pieces of text that are automatically stored in the memory of your Internet browser by our websites or App. This allows you to access and retrieve stored information on your computer or smartphone as needed. We use cookies to display banners on the website, to operate our website management system, to authenticate you, and to retrieve session data. This allows us to better tailor your experience on our website the next time you visit it. Most Internet browsers automatically accept cookies, but you can change your Internet browser settings at any time to decline cookies. Please note that if you choose to decline cookies, you may not be able to use all of the features of our website.

8.2. We use several types of cookies:

- user input cookies,
- authentication cookies,
- cookies with your preferences and parameters,
- performance cookies,
- security (anti-fraud) cookies,
- third-party advertising cookies,
- own analytic cookies, and
- social media tracking cookies.

8.3. Some of our web pages use electronic tags (web beacons) to obtain aggregate statistics about the effectiveness of our advertising campaigns and other operations. We also include web

beacons in the emails we send to you to determine the effectiveness, efficiency and optimization of our mailings and user experience. We use various analytics services for these purposes.

9. Your Rights

9.1. You may request from the Company information about your personal data that is being processed, request your personal data be corrected if it is inaccurate, and request that your personal data be deleted and that processing of your personal data be stopped.

9.2. Upon receipt of such requests, the Company may take the necessary steps and request the person making the request to provide the information necessary to certify that he or she is the subject of the personal data requested. This measure is intended to protect your personal data from disclosure to third parties and to prevent attempts to gain access to personal data of other persons.

10. Obligations of the Company

10.1. In accordance with the requirements of Federal Law No. 152-Φ3 on Personal Data dd. June 27, 2006, the Company shall

- Upon your request, provide information about the processing of your personal data specified in cl. 3.1 of the Policy or a reasonable refusal to do so.
- Take the necessary and appropriate measures to ensure compliance with the obligations under the Law.
- Upon your request, clarify, block or delete the processed personal data if it is incomplete, outdated, inaccurate, unlawfully obtained or unnecessary for the stated purpose of processing.
- Ensure the lawfulness of the processing of personal data. If it is impossible to ensure the lawfulness of the processing of personal data, the Company shall destroy or ensure the destruction of the personal data within ten (10) business days from the date on which it becomes aware of the unlawful processing of personal data.
- If you withdraw your consent to the processing of personal data, we will stop processing and destroy the personal data within a period not exceeding thirty (30) business days from the date of receipt of your withdrawal. Exceptions are cases where processing may continue in accordance with the laws of the Russian Federation.

11. Personal Data Protection Information

11.1. All personal data provided by you is confidential by default. The protection of personal data processed by the Company is ensured by implementing legal, organizational and technical measures necessary and appropriate to comply with the requirements of the laws of the Russian Federation on personal data protection. However, we always try to protect your personal data as much as possible and take more measures for its protection than required by law. The measures taken by the Company to protect personal data are listed below.

- Development of the Company's local regulations to implement the requirements of Russian laws, including this Privacy Policy, relating to the processing and protection of personal data.

- Rejecting any methods of personal data processing that do not meet the purposes established by the Company.
- Appointing a person responsible for the organization of personal data processing. You can contact this person at the following email addresses: pdn@gazprombank.investments or pdn@newton.investments.
- Limiting the number of the Company's employees who have access to personal data and establishing an authorized access system.
- Regular assessment of the risks associated with the processing of personal data.
- Internal investigations to uncover facts related to unauthorized access to personal data.
- Using encryption methods when processing personal data.
- Monitoring and analyzing the security of the Company's network infrastructure.
- Familiarizing the Company's employees with the provisions of the laws of the Russian Federation on personal data, including the requirements for protection of personal data, the Company's local regulations on personal data processing, and training of such employees.
- Implementation of security procedures in the premises where personal data carriers are located to prevent uncontrolled intrusion or presence in these premises of persons who do not have the right to access these premises.
- Application of technical means of information protection in accordance with the laws on personal data protection.
- Organization of training sessions for the Company's employees on various issues related to personal data processing.

12. Places of Processing

12.1. The place of processing of your personal data, regardless of your place of residence, is the place of business of the Company, i.e. the Russian Federation. The legislation of the Russian Federation on personal data protection may differ from the legislation of your country of residence.

13. Recipients and Legal Framework for Data Transfer

13.1. The confidentiality of your personal data is respected, except for the processing of personal data to which you have provided access to an unlimited number of persons or such access has been provided upon your request.

13.2. The Company may transfer your personal data to third parties in the following cases:

- if the transfer is necessary to achieve the objectives, to implement and perform the functions, powers and duties imposed on the Company by the laws of the Russian Federation;

- you have given your consent; and
- to investigate possible violations.

13.3. The Company undertakes and obliges third parties, if they are granted the right to process personal data, to respect the confidentiality of personal data and not to use personal data without your consent, except as provided for in this Policy.

13.4. The Company does not make any cross-border transfers of user's personal data.

14. Limitation of This Policy

14.1. The Company may amend this Policy without prior notice to you. The new version of the Policy will be effective when posted at <https://newton.investments> and <https://gazprombank.investments>, unless otherwise stated in the new version of the Policy.

14.2. The Company may amend this Policy from time to time. The Policy shall be mandatory revised in case of material changes in international or Russian laws on personal data.

14.3. The Company is not liable for the actions of third parties who gain access to your personal data through your fault.

15. Requests by the Personal Data Subject

15.1. You may obtain information about the processing of your personal data, including

- confirmation of the fact of processing your personal data;
- the legal framework for the processing your personal data;
- the purposes and methods of processing your personal data used by the Company;
- which of your personal data we process and the source of the personal data;
- the terms of the processing of your personal data, including the duration of storage;
- the procedure for exercising the rights under the laws of the Russian Federation;
- information on the cross-border data transfers that have taken place or are expected to take place;
- information about persons to whom personal data may be disclosed on the basis of an agreement with the Company or in accordance with the laws of the Russian Federation;
- name or surname, name, patronymic and address of the person who processes personal data on behalf of the Company, if the processing is assigned or will be assigned to such a person; and
- other information as required by the laws of the Russian Federation.

15.2. You may send your requests to the Company, including requests regarding the use of your personal data

- In writing to the following address: 2 Novodmitrovskaya St., building 2, office 15-05, 127015, Moscow, Russian Federation.
- In the form of an electronic document to pdn@gazprombank.investments or pdn@newton.investments.

15.3. The request shall contain the following information:

- number of the main identification document,
- information on the date of issue of the above-mentioned document and the issuing authority,
- information confirming your participation in the relationship with the Company, and
- your signature.

15.4. The Company undertakes to consider the request and send a reply to the address indicated in the request within thirty (30) calendar days from the date of receipt of your request.

15.5. All correspondence received by the Company (written or electronic requests) shall be considered confidential information and shall not be disclosed without written consent.

15.6. You may obtain such information an unlimited number of times.

16. Contact Info and Details of the Company

Newton Investments, LLC, 2 Novodmitrovskaya St., building 2, office 15-05, 127015, Moscow, Russian Federation.