Privacy Policy

for Personal Data of Website Users

1. General Provisions

1.1. This Privacy Policy for Personal Data of Website Users (hereinafter referred to as the "Policy") has been developed in compliance with the requirements of Art. 18.1 of Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data," as well as other regulatory legal acts of the Russian Federation in the field of personal data protection and processing.

1.2. JOINT-STOCK COMPANY "FIRST GENETICS" (INN: 7725323844, OGRN: 1167746676680, address: 121205, Moscow, Skolkovo Innovation Center Territory, Bolshoy Boulevard, 42, building 1, premises 619) (hereinafter referred to as the "Operator") ensures the protection of processed personal data from unauthorized access and disclosure, unlawful use or loss in accordance with the requirements of Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data."

1.3. The Policy is a publicly available document that applies only to the website located on the information and telecommunications network the Internet at: fg-onko.ru (hereinafter referred to as the "Website").

1.4. The Policy does not apply to third-party websites that the personal data subject may access through the Website.

1.5. The Policy establishes general requirements and rules for all employees of the Operator involved in the processing of personal data, regarding work with all types of information media containing personal data of subjects using the Website.

1.6. The Policy does not apply to issues of ensuring the security of personal data classified as information constituting the state secret of the Russian Federation.

1.7. The concepts contained in Art. 3 of the Law on Personal Data are used in this Policy with similar meaning.

1.8. The following terms are also used in this Policy:

Personal Data Subject, User/Website Visitor – any person visiting the Website and using the information, materials and services of the Website.

Website – a set of software and hardware for computers that ensures the publication for public viewing of information and data united by a common purpose, through technical means used for communication between computers on the Internet.

Confidentiality of Personal Data – a requirement mandatory for the Operator or any other person who has gained access to personal data, not to disclose personal data to third parties and not to distribute personal data without the consent of the personal data subject or without another legal basis provided for by federal law.

Chief Executive Officer (CEO) – the sole executive body of the Operator.

1.9. Basic Rights and Obligations of the Operator.

1.9.1. The Operator has the right to:

- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations provided for by the Law on Personal Data and

regulatory legal acts adopted in accordance therewith, unless otherwise provided for by this law or other federal laws;

- entrust the processing of personal data to another person with the consent of the personal data subject, unless otherwise provided for by federal law, on the basis of a contract concluded with such person. The person processing personal data on behalf of the Operator must comply with the principles and rules for processing personal data provided for by the Law on Personal Data, maintain the confidentiality of personal data, and take necessary measures aimed at ensuring the fulfillment of obligations provided for by the said law;
- receive from the User accurate information and/or documents containing personal data for the processing purposes specified in clause 2.3 of the Policy;
- in the event of the User's withdrawal of consent to the processing of personal data, as well as upon receipt of a request to stop processing personal data, the Operator has the right to continue processing personal data without the consent of the personal data subject only if there are grounds specified in the Law on Personal Data.

1.9.2. The Operator is obliged to:

- organize the processing of personal data solely for the purposes specified in clause 2.3 of the Policy, in accordance with the procedure established by the current legislation of the Russian Federation;
- provide the User, upon their request, with information related to the processing of their personal data;
- respond to inquiries and requests from the User and their legal representative in accordance with the requirements of the Law on Personal Data;
- report to the authorized body for the protection of the rights of personal data subjects, at the request of that body, the necessary information within the time limits established by law;
- adopt legal, organizational and technical measures to protect personal data from unlawful or accidental access, destruction, alteration, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data;
- cease the transfer (distribution, provision, access) of personal data, stop processing and destroy personal data in the manner and cases provided for by the Law on Personal Data;
- fulfill other obligations provided for by the Law on Personal Data.

1.10. Basic Rights and Obligations of the User.

1.10.1. The User has the right to:

- receive information related to the processing of their personal data, including information about the Operator, confirmation of the fact of processing, as well as the right to review their personal data, except in cases provided for by the legislation of the Russian Federation;
- demand from the Operator the clarification, blocking or destruction of their personal data if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as take measures provided for by law to protect their rights;
- withdraw consent to the processing of personal data, as well as send a request to stop processing personal data;
- appeal to the authorized body for the protection of the rights of personal data subjects or in court the actions or inaction of the Operator if they believe that the Operator is processing their personal data in violation of the requirements of Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data" or is otherwise violating their rights and freedoms;
- exercise other rights provided for by the legislation of the Russian Federation.

1.10.2. The User is obliged to:

- ensure the accuracy of the personal data provided to the Operator that is necessary for the processing purposes specified in clause 2.3 of the Policy;
- notify the Operator of the clarification (update, change) of their personal data.

1.11. Responsibility for violation of the requirements of the legislation of the Russian Federation and regulatory acts of the Operator in the field of processing and protection of personal data is determined in accordance with the legislation of the Russian Federation.

2. Purposes and Legal Bases for the Processing of Personal Data

2.1. The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. The processing of personal data incompatible with the purposes of collecting personal data is not permitted.

2.2. Only personal data that meet the purposes of their processing are subject to processing.

2.3. The Operator processes personal data on the website for the following purposes:

- preparation, conclusion and execution of a civil law contract;
- promotion of goods, works, services on the market;
- ensuring compliance with the legislation of the Russian Federation in the field of healthcare;
- provision of medical services, including medical examinations and laboratory tests, through the preparation, conclusion and execution of civil law contracts;
- collection and analysis of statistical data to improve the operation of the Operator's website;
- establishing feedback on the Operator's website, as well as providing customer and technical support;
- identification and management of an account on the Operator's website;
- fulfillment of legal requirements in the field of healthcare regarding the disclosure of information about medical professionals on the Operator's website;
- placing an order on the Operator's website.

2.4. Regulatory legal acts in accordance with and for the execution of which the Operator processes personal data:

- The Constitution of the Russian Federation;
- The Civil Code of the Russian Federation;
- Law of the Russian Federation No. 2300-I dated February 7, 1992 "On Protection of Consumer Rights";
- Federal Law No. 149-FZ dated July 27, 2006 "On Information, Information Technologies and Protection of Information";
- Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data";
- Federal Law No. 323-FZ dated November 21, 2011 "On the Fundamentals of Protecting the Health of Citizens in the Russian Federation";
- Federal Law No. 294-FZ dated December 26, 2008 "On the Protection of the Rights of Legal Entities and Individual Entrepreneurs in the Exercise of State Control (Supervision) and Municipal Control";
- Federal Law No. 244-FZ dated September 28, 2010 "On the Skolkovo Innovation Center";
- Decree of the President of the Russian Federation No. 188 dated March 6, 1997 "On Approval of the List of Confidential Information";

- Decree of the Government of the Russian Federation No. 1119 dated November 1, 2012 "On Approval of Requirements for the Protection of Personal Data during their Processing in Personal Data Information Systems";
- Decree of the Government of the Russian Federation No. 736 dated May 11, 2023 "On Approval of the Rules for the Provision of Paid Medical Services by Medical Organizations";
- Order of the FSTEC of Russia No. 21 dated February 18, 2013 "On Approval of the Composition and Content of Organizational and Technical Measures to Ensure the Security of Personal Data during their Processing in Personal Data Information Systems";
- other regulatory legal acts regulating relations related to the activities of the Operator.

2.5. The legal basis for the processing of personal data is also:

- processing of personal data is carried out with the consent of the personal data subject to the processing of their personal data;
- processing of personal data is necessary to achieve the purposes provided for by an international treaty of the Russian Federation or law, for the implementation and fulfillment of functions, powers and obligations imposed on the Operator by the legislation of the Russian Federation;
- processing of personal data is necessary for the execution of a contract to which the personal data subject is a party, beneficiary or guarantor, as well as for concluding a contract on the initiative of the personal data subject or a contract under which the personal data subject will be the beneficiary or guarantor. The contract concluded with the personal data subject may not contain provisions restricting the rights and freedoms of the personal data subject, establishing cases of processing personal data of minors, unless otherwise provided for by the legislation of the Russian Federation, as well as provisions allowing the inaction of the personal data subject as a condition for concluding the contract;
- processing of personal data subject to publication or mandatory disclosure in accordance with federal law is carried out.

3. Scope and Categories of Processed Personal Data, Categories of Personal Data Subjects

3.1. The content and scope of processed personal data must correspond to the stated processing purposes provided for in Section 2 of this Policy. The processed personal data must not be excessive in relation to the stated purposes of their processing.

3.2. The Operator may process personal data of the following categories of personal data subjects:

3.2.1. Clients and counterparties of the Operator, including their representatives, beneficiaries under contracts, legal representatives, patients, website visitors – for the purpose of preparing, concluding and executing contracts: last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; email address; residential address; registration address; phone number; INN (Taxpayer Identification Number); citizenship; identity document data; bank card details; current account number; personal account number; position; information about employment (including work experience, data on current employment indicating the name and current account of the organization).

3.2.2. Clients and counterparties of the Operator, including their representatives, beneficiaries under contracts, legal representatives, patients – for the purpose of promoting goods, works, services on the market: last name, first name, patronymic; email address; phone number.

3.2.3. Patients, employees – for the purpose of ensuring compliance with the legislation of the Russian Federation in the field of healthcare: last name, first name, patronymic; year of birth;

month of birth; date of birth; place of birth; gender; residential address; registration address; phone number; SNILS (Individual Insurance Account Number); INN; citizenship; identity document data; identity document data valid outside the Russian Federation; data contained in the birth certificate; profession; position; information about employment (including work experience, data on current employment indicating the name and current account of the organization); information about education; information about health status.

3.2.4. Patients, clients – for the purpose of providing medical services, including medical examinations and laboratory tests, through the preparation, conclusion and execution of civil law contracts: last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; email address; residential address; registration address; phone number; SNILS; citizenship; identity document data; identity document data valid outside the Russian Federation; data contained in the birth certificate; bank card details; current account number; personal account number; information about health status; nationality.

3.2.5. Website visitors – for the purpose of collecting and analyzing statistical data to improve the operation of the Operator's website: information collected through metric programs.

3.2.6. Website visitors – for the purpose of establishing feedback on the Operator's website, as well as providing customer and technical support: last name, first name, patronymic; email address; phone number; city of residence.

3.2.7. Website visitors – for the purpose of identification and management of an account on the Operator's website: last name, first name, patronymic; email address; phone number.

3.2.8. Employees – for the purpose of fulfilling legal requirements in the field of healthcare regarding the disclosure of information about medical professionals on the Operator's website: last name, first name, patronymic; profession; position; information about employment (including work experience, data on current employment indicating the name and current account of the organization); information about education; photo/video image of the face.

3.2.9. Website visitors – for the purpose of placing an order on the Operator's website: last name, first name, patronymic; year of birth; month of birth; date of birth; email address; residential address; registration address; phone number; identity document data; bank card details; current account number; information about health status.

3.3. The Operator does not process biometric personal data (information that characterizes the physiological and biological characteristics of a person, on the basis of which their identity can be established), nor special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, health status, intimate life, except in cases provided for by the legislation of the Russian Federation.

3.4. All personal data should be obtained from the User themselves. In the event that consent to the processing of personal data is obtained from a representative of the User, their authority must be confirmed in accordance with the procedure established by law.

4. Procedure and Conditions for the Processing of Personal Data

4.1. The Operator processes personal data in accordance with the requirements of the legislation of the Russian Federation in the following ways:

- non-automated processing of personal data;
- automated processing of personal data with or without the transfer of the received information via information and telecommunications networks;

- mixed processing of personal data.

4.2. The list of actions performed by the Operator with the personal data of personal data subjects for the purposes specified in clause 2.3 of the Policy:

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

4.3. The Operator processes personal data with the consent of the personal data subjects to the processing of their personal data, as well as without such consent in cases provided for by the legislation of the Russian Federation.

4.4. Access to personal data is granted only to those employees of the Operator whose job responsibilities involve the processing of personal data. The list of such employees is determined by the local regulations of the Operator and approved by order of the Head of the Operator.

4.5. The disclosure of personal data to third parties and the distribution of personal data without the User's consent is not permitted, unless otherwise provided for by federal law. The consent to the processing of personal data authorized by the User for distribution is executed separately from other consents of the User to the processing of their personal data. The requirements for the content of the consent to the processing of personal data authorized by the personal data subject for distribution are approved by Order of Roskomnadzor No. 18 dated February 24, 2021 "On Approval of the Requirements for the Content of Consent to the Processing of Personal Data Authorized by the Personal Data Subject for Distribution."

4.6. The transfer of personal data to state authorities, local self-government bodies, as well as other authorized bodies is carried out within the framework of fulfilling the requirements of the legislation of the Russian Federation, as well as subject to the mandatory verification of the legality and justification of such a request.

4.7. The Operator guarantees the confidentiality of the received personal data of the User. When processing personal data, the Operator takes necessary legal, organizational and technical measures or ensures their adoption to protect personal data from unlawful or accidental access, destruction, alteration, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data.

4.7.1. The security of personal data is achieved by the following methods:

- identification of threats to the security of personal data during their processing in personal data information systems;
- application of organizational and technical measures to ensure the security of personal data during their processing in personal data information systems, necessary to fulfill the requirements for the protection of personal data;

- application of information security means that have passed the conformity assessment procedure in accordance with the established procedure;
- adoption of local regulations and other documents regulating relations in the field of processing and protection of personal data;
- appointment of a person responsible for organizing the processing of personal data;
- assessment of the effectiveness of the applied measures to ensure the security of personal data;
- accounting of machine-readable media containing personal data;
- detection of facts of unauthorized access to personal data and taking appropriate measures;
- restoration of personal data modified or destroyed as a result of unauthorized access;
- establishment of rules for access to personal data processed in the personal data information system, as well as ensuring registration and recording of all actions performed with personal data in the personal data information system;
- implementation of continuous monitoring of the measures taken and the level of security of personal data information systems;
- training of employees of the Operator directly involved in the processing of personal data on the provisions of the legislation of the Russian Federation.

4.8. The Operator stores personal data in a form that allows identification of the personal data subject for no longer than each purpose of processing personal data requires, unless the storage period for personal data is established by federal law or contract.

4.8.1. If documents containing personal data created in the course of the Operator's activities are classified as archival documents, their retention period may be determined in accordance with Order of the Federal Archival Agency No. 236 dated December 20, 2019 "On Approval of the List of Standard Managerial Archival Documents Created in the Course of Activities of State Bodies, Local Self-Government Bodies and Organizations, Indicating their Retention Periods."

4.8.2. The retention period for personal data processed in personal data information systems corresponds to the retention period for personal data on paper media.

4.9. The processing period for personal data is determined by the achievement of the purposes for which they were collected, unless a different period is provided for by the contract or agreement with the User, as well as by current legislation.

4.9.1. The conditions for termination of processing of personal data may include: achievement of the purposes of processing personal data or loss of necessity to achieve these purposes, expiration of the consent period or withdrawal of consent to the processing of personal data (if there are no other grounds for processing personal data provided for by law), identification of unlawful processing of personal data, as well as in the event of termination of the Operator's activities.

4.10. When a User contacts the Operator with a request to stop processing personal data, the processing of personal data is terminated within a period not exceeding ten working days from the date the Operator receives the relevant request, except in cases provided for by the Law. The specified period may be extended, but not more than by five working days. To do this, the Operator must send the User a reasoned notification indicating the reasons for extending the period.

4.11. When collecting personal data via the information and telecommunications network "Internet," the Operator ensures the recording, systematization, accumulation, storage, clarification (update, change), extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except for the cases specified in the Law on Personal Data.

4.12. The Operator ensures the confidentiality and security of personal data during their processing in accordance with the requirements of the Operator's local regulations and the requirements of current legislation.

4.13. The Operator does not carry out cross-border transfer of personal data.

4.14. To analyze User behavior on the Website, improve its quality and content, and also for targeting advertising materials, the Website uses metric programs (web analytics services).

4.14.1. When using the Website, the User agrees to the automatic processing of data transmitted by their browser using the specified programs, including: IP address, cookie data, browser information, technical characteristics of hardware and software, date and time of access, addresses of requested pages and other similar information.

4.14.2. The following metric programs are used on the Website:

Yandex.Metrica. Data processing is carried out in accordance with the Yandex Privacy Policy: https://yandex.ru/legal/confidential/.

4.14.3. Metric programs collect generalized statistical information that does not identify a specific User and is not used to establish their identity. The data obtained is intended to provide information on how Users interact with the Website and helps the Operator improve its functionality and content.

4.14.4. The User may prohibit the collection of data by metric programs by disabling cookies in their browser settings or by using special software to block them.

4.14.5. Disabling the use of metric programs may result in a deterioration in the quality of the Website and limited availability of some of its functions.

4.15. The Operator transfers personal data to the following third parties:

4.15.1. Limited Liability Company "Yandex," INN: 7736207543

Address: 119021, Moscow, ul. Lva Tolstogo, 16.

Purpose of data transfer – collection and analysis of statistical data to improve the operation of the Operator's website.

4.15.2. Limited Liability Company "Reg.Ru," INN: 7733568767

Address: 125315, Moscow, Leningradsky Prospekt, 72, building 3.

Purpose of data transfer – provision of hosting services.

4.16. Persons processing Users' personal data on behalf of the Operator are obliged to comply with the principles and rules for processing personal data provided for by the legislation of the Russian Federation.

5. Updating, Correction, Deletion, Destruction of Personal Data, Responses to Requests from Subjects for Access to Personal Data

5.1. Procedure for granting access to personal data on the basis of an application (request).

5.1.1. The information provided for in Part 7 of Art. 14 of the Law on Personal Data is provided to the User within ten working days from the moment the Operator receives the request. The

specified period may be extended by no more than five working days, provided that a reasoned notification is sent to the User.

5.1.2. The Operator provides the requested information to the User or their representative in the form in which the relevant application or request was submitted, unless otherwise stated in the application or request itself. If the application (request) does not contain all the necessary information in accordance with Part 3 of Art. 14 of the Law on Personal Data, or the personal data subject does not have the right to access the requested information, a reasoned refusal is sent to them.

5.1.3. The User's right to access their personal data may be restricted in accordance with Part 8 of Art. 14 of the Law on Personal Data, including if access to their personal data violates the rights and legitimate interests of third parties.

5.2. Procedure for updating and correcting personal data.

5.2.1. If inaccurate personal data is identified upon application by the User or their representative, or upon their request, or upon request of the authorized body for the protection of the rights of personal data subjects, the Operator shall block the personal data relating to that User from the moment of such application or receipt of the specified request for the period of verification, unless blocking the personal data violates the rights and legitimate interests of the User or third parties.

5.2.2. If the fact of inaccuracy of personal data is confirmed, the Operator, on the basis of information provided by the User or their representative or the authorized body for the protection of the rights of personal data subjects, or other necessary documents, shall clarify the personal data within seven working days from the date of provision of such information and shall unblock the personal data.

5.3. Procedure for terminating unlawful processing of personal data.

5.3.1. If unlawful processing of personal data is identified upon application (request) of the User or their representative or the authorized body for the protection of the rights of personal data subjects, the Operator shall block the unlawfully processed personal data relating to that User from the moment of such application or receipt of the request for the period of verification.

5.3.2. If the fact of unlawful processing of personal data is confirmed, the Operator shall, within a period not exceeding three working days from the date of such identification, stop the unlawful processing of personal data or ensure the cessation of unlawful processing of personal data. If it is impossible to ensure the lawfulness of the processing of personal data, the Operator shall, within a period not exceeding ten working days from the date of identification of unlawful processing of personal data, destroy such personal data or ensure their destruction.

5.4. Deletion of personal data from the Website is carried out on the basis of a written application of the User (their representative) or the authorized body for the protection of the rights of personal data subjects, including in the form of an electronic document signed with an electronic signature in accordance with the legislation of the Russian Federation.

5.5. Procedure for the destruction of personal data by the Operator.

5.5.1. The Operator destroys personal data in the following cases and within the following time limits:

- upon achievement of the purpose of processing personal data or loss of necessity to achieve it – within thirty days;
- upon the request of the User (their representative), upon providing confirmation that the personal data was obtained illegally or is not necessary for the stated purpose of processing – within seven working days;

- upon withdrawal by the User of consent to the processing of their personal data, if their retention is no longer required for the purpose of their processing – within thirty days;
- upon expiration of the retention periods for documents containing personal data – within thirty days.

5.5.2. Upon achievement of the purpose of processing personal data, as well as in the event of withdrawal by the User of consent to the processing of personal data, they are subject to destruction, unless otherwise provided for by the contract or other agreement with the User or the Operator is not entitled to carry out processing without the User's consent on the grounds provided for by the Law on Personal Data or other federal laws.

5.5.3. The destruction of personal data is carried out by a commission established by order of the Head of the Operator.

5.5.4. The methods of destruction of personal data are established in the local regulations of the Operator.

6. Final Provisions

6.1. The Policy is approved by Order No. 1-C dated May 26, 2026, and is valid indefinitely until a new version of the Policy comes into force.

6.2. In the event of changes in the legislation of the Russian Federation in the field of personal data protection, the Operator adopts a new version of the Policy taking into account the changes. Until that time, the Policy is valid in the part that does not contradict the current legislation of the Russian Federation.

6.3. For the purpose of contacting the Operator, the following contact details may be used:

phone: +7 (499) 673-02-88;

e-mail: info@f-genetics.com;

postal address: 121205, Moscow, Skolkovo Innovation Center Territory, Bolshoy Boulevard, 42, building 1, premises 619.

May 26, 2026

Chief Executive Officer _____ /N.A. Kuznetsov

JSC "FIRST GENETICS"