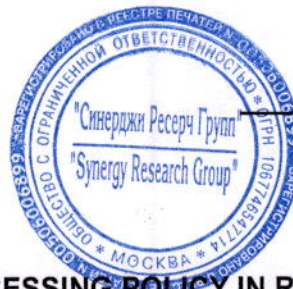


APPROVED BY
General Director
Limited liability company "Synergy Research Group"
(OOO "Synergy" LLC) (OGRN code 1067746547714,
registered office: Olkhovskaya str., 45, bld.1, 105066 Moscow, Russia)

Galina Malakhova



15.06.2024

PRIVACY AND PERSONAL DATA PROCESSING POLICY IN RELATION TO THE COMPANY'S ACTIVITIES ON THE INTERNET

This Privacy and Personal Data Processing Policy (hereinafter referred to as the Policy) is an integral part of the Terms of use for the Website located in the Internet at the following URL: www.srgcro.com (hereinafter referred to as the Website).

Using the Website means that the User gives unconditional consent to the Policy and the terms of personal data processing specified in it; the User should refrain from using the Website in case the User disagrees with the terms.

The Policy is developed and approved by "Synergy" LLC (hereinafter referred to as the "Company", a legal entity established in accordance with the legislation of the Russian Federation, OGRN code 1067746547714, registered at: Olkhovskaya str., 45, bld.1, 105066 Moscow), which serves as the Website administrator.

This document determines the Company Policy (as a data processor in accordance with Federal Law No. 152-FZ "On Personal Data") in relation to the processing of personal data collected by the Company via the Internet telecommunications network. The company also has other local regulations that define its Policy (as a data processor in accordance with Federal Law No. 152-FZ "On Personal Data") in relation to the processing of personal data collected by the Company without the use of the Internet telecommunications network.

1. GENERAL PROVISIONS

1.1. For the purpose of this Policy, personal data of the Website User is considered to be:

1.1.1. Personal data which the User individually provides about himself/herself when sending a request to the Company on issues related to clinical trials of medicines, including name, e-mail, name of the organization, details of the request to contact the Company.

1.1.2. Data automatically transferred to the Website services during the process of their use by means of software installed on the User's device including IP-address, cookie data, data on the User's browser (or any other application used to get access to the services), specifications of hardware and software utilized by the User, date and time of access to the

services, URL-addresses of the requested web-pages and other similar information.

1.1.3. The Privacy Policy is only applied to the Website; the Company does not control or bear responsibility for the third party Websites which the User can access via links provided on the Website.

2. PURPOSES OF USERS PERSONAL DATA PROCESSING

2.1. The Website only collects and stores personal data which is required to provide feedback or fulfill agreements and contracts with the User unless mandatory storage of personal data for a particular period of time is required by law.

In case the User notifies of withdrawal of the personal data processing consent the Website terminates processing of the User's personal data within a period of up to 10 working days from the date of receipt of the relevant request.

Notification of withdrawal of the personal data processing consent should be sent to the E-mail address: dpo@srgcro.com, as well as by sending a written request to the Company's address of location specified in this document.

2.2. The Company processes the User's personal data for the following purposes:

2.2.1. Establishing feedback with the User including sending notifications and requests related to the use of the Website, delivery of services, processing requests and applications from the User.

2.2.2. Tracking the User's location to provide security and prevent fraud.

2.2.3. Confirming accuracy and completeness of personal data provided by the User.

2.2.4. Providing the User with the effective client and technical support should there be any problems related to the use of the Website.

2.2.5. Managing advertising activities with the consent of the User.

3. TERMS AND CONDITIONS FOR USERS PERSONAL DATA PROCESSING AND TRANSFER TO THIRD PARTIES

3.1. The User's personal data is kept confidential except for cases when the User voluntarily shares his/her personal data in the public domain.

3.2. The Website is entitled to transfer the User's personal data to third parties upon any of the following:

3.2.1. The User gave consent to such actions.

3.2.2. Data transfer is required for the purpose of using a certain service by the User or for fulfilling a certain agreement and a contract with the User.

3.2.4. Data transfer is stipulated by the Russian or any other applicable legislation to the extent permitted under applicable law.

3.3. The processing of the User's personal data is performed for an unlimited period of time in the following ways: collection, recording, systematization, accumulation, storage, clarification (updating, amending), extraction, use, transfer (distribution, provision, access), anonymizing, blocking, deletion, destruction of personal data including personal data information systems both with the use of automation tools and without their use. The processing of the Users' personal data is carried out in accordance with Federal Law of 27 July 2006 N 152-FZ "On Personal Data".

3.4. In case of personal data loss or disclosure the Company shall inform the User thereof.

3.5. The Company takes necessary organizational and technical measures to protect the User's personal data from unauthorized or inadvertent access, destruction, amending, blocking, copying, distribution as well as other acts of misconduct by third parties.

3.6. The Company along with the User takes all necessary measures to prevent losses or any other negative effects caused by the loss or disclosure of the User's personal data.

4. OBLIGATIONS OF THE PARTIES

4.1. The User is obliged to:

4.1.1. Provide correct information on personal data which is required to use the Website and to provide feedback to the User.

4.1.2. Amend and supplement the provided information on personal data in case of any changes.

4.2. The Company is obliged to:

4.2.1. Use the received information solely for the purposes specified in this Policy.

4.2.2. Ensure that confidential information is kept secret and not disclosed without the prior written consent of the User, as well as not to sell, exchange, publish or in any other way disclose personal data provided by the User except as specified in this Policy.

4.2.3. Perform blocking of personal data related to the relevant User for the period of inspection immediately upon receipt of application or request from the User or his/her legal representative or from the authorized body for protection of the rights of personal data subjects in case of revealing unreliable personal data or misconduct.

5. LIABILITY OF THE PARTIES

5.1. The Company that has failed to fulfill its obligations is liable for damages caused to the User due to misuse of personal data in accordance with the legislation of the Russian Federation.

5.2. The Company shall not be liable for confidential information loss or disclosure if such information:

5.2.1. Became publicly available prior to its loss or disclosure.

5.2.2. Was obtained from a third party prior to its receipt by the Company.

5.2.3. Was disclosed with the User's consent.

6. SETTLEMENT OF DISPUTES

6.1. It shall be binding to submit a claim (a written proposal for voluntary settlement of a dispute) prior to filing actions with a court on disputes arising from relations between the Website User and the Company.

6.2. The claimee notifies the claimant in writing of the results of the claim consideration within 30 calendar days of the claim receipt.

6.3. If the parties fail to agree the dispute will be referred to the court in accordance with the current legislation of the Russian Federation.

6.4. The current legislation of the Russian Federation applies to the present Privacy Policy and relations between the User and the Company.

7. ADDITIONAL PROVISIONS

7.1. The Company is entitled to amend the Privacy Policy without the User's consent.

7.2. The amended Policy shall come into force when published on the Website unless otherwise stipulated by the amended version of the Policy.

7.3. All suggestions or concerns related to the Privacy Policy should be sent to the following E-mail address: dpo@srgcro.com.

7.4. The effective Privacy Policy is located at the following URL: www.srgcro.com

7.5. This Privacy Policy is an integral part of the Terms of use for the Website located at the following URL: www.srgcro.com.