### PERSONAL DATA CONFIDENTIALITY POLICY

This Personal Data **CONFIDENTIALITY** Policy (hereinafter – the Confidentiality Policy) has been developed in accordance with the requirements of Russia's Federal Law No. 152-FZ (Φ3) dated July 27, 2006 "On Personal Data", as well as the requirements of Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and on the repeal of Directive 95/46/EC (General Data Protection Regulation, GDPR)". The Policy defines the procedure for processing personal data received by the Operator from the Users of the website when using the website ai-journey.ru (hereinafter – the Website), and measures to ensure the security of personal data at Sberbank of Russia (INN 7707083893, OGRN 1027700132195, address: 19 Vavilova St, Moscow, 117997) (hereinafter – the Operator) in order to protect human and civil rights and freedoms in the processing of personal data.

### 1. Terms and Definitions

- 1.1. 1.1 This Confidentiality policy uses the following terms:
- 1.1.1 "Operator" a state authority, municipal authority, legal or physical entity that, independently or jointly with other entities, organizes and/or performs processing of personal data, as well as defining the purposes of personal data processing, the content of personal data to be processed, actions (transactions) performed with personal data;
- 1.1.2 "AI Journey 2021 Event" an organized action or a set of actions aimed at supporting research activities in the field of data analysis, machine learning, artificial intelligence, as well as promoting the use of modern technologies of machine learning and artificial intelligence, finding and attracting specialists from these areas, expanding the circle of business partners;
- 1.1.3. "Personal Data" any information that refers directly or indirectly to an identified or identifiable individual (personal data subject).
- 1.1.4. "Processing of personal data" action (transaction) or a number of actions (transactions) performed with or without the use of means of automation in regards to such personal data, including collection, recording, systematization, accumulation, storage, specification (updating, modification), retrieval, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction of personal data;
- 1.1.5. "Confidentiality of personal data" obligatory compliance of the Operator, User or another entity granted with access to personal data with the requirement of preventing its dissemination without the consent of the personal data subject, or any legal ground thereto.
- 1.1.6. "Website <a href="https://ai-journey.ru/">https://ai-journey.ru/</a>" (the Website) a collection of interconnected web pages located on the Internet at the unique address (URL): <a href="https://ai-journey.ru/">https://ai-journey.ru/</a>;
- 1.1.7. "Website User" (the User) a person who has registered on the Website and/or possesses the access details for the Website (login and password).
- 1.1.8. "Cookie" a small fragment of data which a website requests from the browser used on your PC or mobile device. Cookies allow the website to "remember" your actions or preferences. Cookies are stored locally on your PC or on a mobile device. Users can delete saved cookie files if they wish;
- 1.1.9. "IP address" a unique network address of the computer network host through which the User accesses the website.

Any other terms and definitions used in this Privacy Policy that are not mentioned in this section will be interpreted systematically in connection with the other terms, individual conditions, and according to the meaning that follows from the text of the Policy. Where it is not

possible to define the content of a term or concept from the text of the Policy, the definition of the term or concept in question shall be determined in accordance with the applicable law in force or in accordance with the prevailing law enforcement practice.

#### 2. General Provisions

- 2.1. Use of the website <a href="https://ai-journey.ru/">https://ai-journey.ru/</a> by the User shall mean the User's consent to this Confidentiality Policy, and the terms and conditions of processing the User's personal data.
- 2.2. Should the User disagree with the conditions of this Confidentiality Policy, the User must stop using the website <a href="https://ai-journey.ru/">https://ai-journey.ru/</a>.
- 2.3 This Confidentiality Policy shall apply to the website <a href="https://ai-journey.ru/">https://ai-journey.ru/</a>. The Operator does not control and is not responsible for the websites (and their content) of third parties to which the User can go using the links available on the website <a href="https://ai-journey.ru/">https://ai-journey.ru/</a>.
- 2.4. The Operator does not check and does not guarantee the authenticity of personal data provided by Users.

### 3. Processed data

- 3.1. Categories of personal data to be processed may include the following:
  - 1. Basic information about the User (in particular, full name, address, contact details (telephone number, e-mail address), age; information about the User's education: whether the User is a student and at which educational institution; information about the User's employment: whether the User is employed, in which field and at which company, in what position; information about the User's experience in data science, whether the User has participated in AI Journey and Sberbank Data Science Journey events before, as well as the User's answer to the questions "How did I learn about AI Journey 2021?" and "Do I plan to participate in AI Journey in Russian cities?");
  - 2. Information about the User's actions on the Website, about the devices used by the User (including geolocation, IP address of the device), other information specified in cl. 3.3.

### 3.3. Use of cookies:

- 3.3.1. Cookies files, information about User's actions on the Website, information about User's equipment, date and time of the session are processed (including using metric programs Yandex.Metrics, Google Analytics) in order to ensure correct operation of the Website, convenience of its use by the User, information about the actions of the Website Users are also processed to determine User's preferences when working with the Website and further improve the functionality of the Website.
- 3.3.2. The User may switch off cookies, after doing so the User may find that some sections of the Website do not function properly.

Instructions on managing cookies can usually be found in the help service (Help function) or settings of the browser.

# 4. Objectives, grounds and methods of personal data processing

- 4.1. Processing of the User's personal data may be performed for the following purposes:
- 4.1.1. Identifying the User, creating an account on the Website and providing the User with access to the content and functionality of the Website: in particular, to enable the User to register as a participant of the AI Journey 2021 Event, other events held by the Operator in

support of research activities in the field of data analysis, machine learning, artificial intelligence, as well as to popularize the use of modern technologies of machine learning and artificial intelligence, finding and attracting specialists from these areas, expanding the circle of business partners (hereinafter – other events);

- 4.1.2. Identifying of the User as a participant of the AI Journey 2021 Event and other events and ensuring of the opportunity to provide the User with services related to such events (in particular, creation and printing of badges, registration of passes, booking of venues where events will be held, other similar actions necessary for the proper conduct of the events), as well as to allow the User to enter the event venues (in the case of offline formats);
- 4.1.3. Notifying and providing the User with necessary information about the AI Journey Event and other events (e.g., venue, dates, etc.), as well as sending the User information and news messages on events in the field of artificial intelligence and data analysis;
- 4.1.4. Analyzing the above data of the User participating in the AI Journey Event and other events in order to decide whether to send the User offers of internship or work at Sberbank, send such offers, as well as inviting the User to follow-up events in the field of data analysis, machine learning, artificial intelligence, as well as promote the use of modern technologies of machine learning and artificial intelligence.
- 4.2. Processing of the User's personal data is carried out only if the User has given consent to the processing of their personal data for one or more specific purposes.
- 4.3. Processing of personal data can be carried out both with the use of means of automation (automated processing), and without the use of such means (non-automated processing), and may include the following actions: collection, recording, systematization, accumulation, storage, specification (updating, modification), retrieval, use, blocking, removal, destruction of personal data, and also granting of access to data to the third parties that carry out technical support of the Website and its functionality.

## 5. Period of collecting personal information

- 5.1. Processing of personal data of the User is carried out as long as it is necessary to achieve the above purposes or for observance of requirements of the applicable legislation.
- 5.2. Processing of personal data in order to send the User information and news messages on events in the field of artificial intelligence and data analysis, as well as in other cases where the processing of personal data is based on consent given by the User for the relevant purpose of processing, is carried out until withdrawal of consent by the User.
- 5.3. Processing of the User's personal data may be carried out after the deletion of the User account on the Website in cases provided for by the applicable legislation.

## 6. Rights and Obligations of the User and the Operator

### 6.1. The User may:

- 6.1.1. When registering on the website <a href="https://ai-journey.ru/">https://ai-journey.ru/</a>, give, of their own free will and volition, their consent to the processing of personal data, as well as withdraw their consent at any time by sending a request for withdrawal in free written form to the addresses specified in cl. 9.1.
- 6.1.2. Request the confirmation of his or her personal data processing. In case of such processing the User has a right to familiarize themselves with the personal data being processed, as well as with information about the purposes of processing, the categories of data being processed, the actions with the data, the receivers of the data and the guarantees when the data is transferred to third parties, the period of processing, the sources of the data, and whether decision-making is fully automated, inclusion of the User in Operator mailing lists. The User may also obtain the list of the personal data being processed.

- 6.1.3. Demand to modify their personal data if inaccuracies are found in the personal data processed by the Operator. Taking into account the purposes of data processing, the User may supplement the personal data, including by submitting an additional application.
- 6.1.4. The User may initiate limitations on processing of all or a part of his or her personal data if one of the following conditions is met:
  - the accuracy of personal data is being contested by the User (limitation for the period necessary for the Operator to confirm the accuracy of the personal data);
  - •unlawful personal data processing has been revealed, the User opposes deleting the personal data and demand limiting the use thereof instead;
  - the Operator does not need the personal data for the purposes of processing any more, but the User needs the personal data for the purpose of substantiation, performance or as part of legal proceedings;
  - the User opposes the processing of their personal data (limitation for a period necessary for the Operator to confirm whether the Operator's legal grounds for personal data processing prevail over the lawful claims of the User).
- 6.1.5 The User has a right to demand deletion of his or her personal data from the Website and/or other existing tangible media, if one of the following conditions is met:
  - the personal data is no longer required for the purposes for which they have been obtained
  - the User withdraws the consent on the basis of which the processing has been carried out, if there are no other legal grounds for processing;
    - the personal data is being processed unlawfully
  - the personal data must be deleted to ensure compliance with a legal obligation in accordance with legislative requirements;
    - the personal data was obtained while delivering information society services.
- 6.1.6. The User has a right to demand the list of their personal data provided to the Operator for the processing thereof in a structured, uniform and machine-readable format, and to instruct the Operator to transfer their personal data to a third party if the Operator has the technical possibility to do so. In this case the Operator shall not be responsible for further actions of a third party related to the personal data.
- 6.1.7. The User has a right to oppose processing of all or a part of the list of their personal data for the purposes indicated when the personal data was provided for the Operator, except for the cases where the legal grounds for personal data processing prevail over the interests, rights and freedoms of the User or where the processing of the personal data is necessary for substantiation, performance or defense in legal proceedings.
- 6.1.8. The User has the right to bring a complaint to the supervisory authority if the Operator violates their rights in any way in relation to personal data processing.

## 6.2. The User shall:

- 6.2.1. Take any necessary measures to ensure confidentiality of the account details (login and password) for accessing the User Profile, make sure that the password is not saved in the browser in case the User's computer is used by other people;
- 6.2.2. Not post materials depicting other persons, personal data of such persons without a proper legal basis, unless such basis is not required by applicable law.

## 6.3. The Operator shall:

- 6.3.1. Use the received personal data of Users only for the purposes specified in cl. 4 of this Confidentiality Policy.
- 6.3.2. Ensure the storage of User personal data in secret, not disclose it without the consent of the User, and also not sell, exchange, publish or disclose in other possible ways the transferred personal data of the User, except for the transfer to authorized state authorities of the

Russian Federation only on the grounds and in the order established by the legislation of the Russian Federation.

6.3.3. Process the personal data of the User and ensure the confidentiality and protection of the processed personal data in accordance with the requirements of Federal Law No.152-FZ ( $\Phi$ 3) "On Personal Data" dated July 27, 2006, as well as GDPR. When processing personal data, take required legal, organizational and technical measures to protect personal data received from the User from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data received from the User.

### 7. Miscellaneous

- 8.1. The Operator may introduce amendments to this Confidentiality Policy.
- 8.2. This Confidentiality Policy shall come into effect upon its publication on the Website, unless otherwise is stipulated by the new version of the Confidentiality Policy.
- 8.3. Please send your suggestions or inquiries regarding this Confidentiality Policy to: info@ai-journey.ru.

## 8. Contact details

9.1. If the User has any questions, suggestions or intends to exercise one or more rights of the User with regard to personal data processing, the User can contact the Operator using the following contact details:

### Sberbank of Russia

Address: Russia, (INN 7707083893, OGRN 1027700132195, address: 19 Vavilova St, Moscow, 117997), e-mail: info@ai-journey.ru