

Personal Data Processing Policy of IT SPACE LLC

1. General Provisions

1.1. This Personal Data Processing Policy (hereinafter — the Policy) has been developed in accordance with the requirements of Federal Law No. 152-FZ of 27 July 2006 "On Personal Data" (hereinafter — the Law on Personal Data) and applies to personal data that IT SPACE LLC (hereinafter — the Operator) receives from visitors of the websites cloudb2b.ru, cloud.cloudb2b.ru, itspace13.ru, as well as from clients and partners.

1.2. The purpose of the Policy is to ensure the protection of the rights and freedoms of an individual in the processing of his or her personal data, to comply with the requirements of the legislation of the Russian Federation, and to clarify the procedure for the Operator's actions with respect to personal data.

2. List of Personal Data Subject to Processing

2.1. The Operator processes the following categories of personal data:

2.1.1. Last name, first name, patronymic (if available).

2.1.2. Contact telephone number.

2.1.3. E-mail address (email).

2.1.4. Name of the organization, INN, KPP (for legal entities and individual entrepreneurs).

2.1.5. Data contained in applications, appeals, and correspondence with the Operator.

2.1.6. Account credentials (logins, passwords) and access data when working in the Operator's software (including 1C products) and infrastructure.

2.2. Only personal data that are necessary for achieving the purposes specified in Section 4 of this Policy shall be subject to processing. The Operator does not process special categories of personal data (concerning racial or national origin, political opinions, religious or philosophical beliefs, health, or private life) or biometric personal data.

3. Legal Bases for the Processing of Personal Data

3.1. The legal bases for the Operator's processing of personal data are:

3.1.1. Consent of the data subject to the processing of his or her personal data.

3.1.2. Performance of a contract to which the data subject is a party or for which the data subject is the beneficiary, as well as the conclusion of a contract at the initiative of the data subject.

3.1.3. Performance of duties and exercise of rights of the Operator imposed on it by the legislation of the Russian Federation.

3.1.4. Exercise of the rights and legitimate interests of the Operator or of third parties, provided that the rights and freedoms of data subjects are not infringed thereby.

4. Purposes of the Processing of Personal Data

4.1. The Operator processes personal data for the following purposes:

4.1.1. Provision of services for access to programs and infrastructure, as well as technical support.

4.1.2. Communication with clients and partners, and sending of notifications relating to the provision of services.

4.1.3. Collection and analysis of analytical information on the operation of the Operator's websites in order to improve the quality of the services provided.

4.1.4. Carrying out marketing mailing (only with the separate consent of the data subject).

5. List of Actions with Personal Data and Conditions of Processing

5.1. The processing of personal data by the Operator includes collection, recording, systematization, accumulation, storage, specification (updating, modification), extraction, use, transmission (provision, access), de-identification, blocking, deletion, and destruction.

5.2. The processing of personal data is carried out using databases located in data centers in the locations specified in Section 10 of this Policy.

6. List of Operators and Persons Processing Personal Data

6.1. The personal data operator is IT SPACE LLC.

6.2. In order to ensure the provision of services, the Operator has the right to engage the following persons (performers):

6.2.1. Accredited infrastructure contractor (provision of computing capacity and data centers) in the locations specified in Section 10 of this Policy.

6.2.2. Technical support services performer — the request processing system HelpDeskEddy (portal hd.1cb2b.com), located on the territory of the Russian Federation: through it the Operator receives clients' requests, appeals, and tickets and stores information related to servicing (full name, contact details, history of appeals, account data). The user's consent to the processing of personal data contained in a request is recorded in the card of the corresponding appeal.

6.2.3. 1C: Franchisee (for the purposes of licensing and granting non-exclusive rights to use the programs).

6.3. With respect to personal data uploaded by clients to databases when using the software, the Operator is not the personal data operator. In this case, the client independently acts as the personal data operator and bears responsibility for their processing in accordance with the legislation of the Russian Federation.

7. Storage Conditions and Terms, Procedure for the Destruction of Personal Data

7.1. Personal data are stored in forms ensuring their processing for the periods necessary to achieve the purposes of processing, unless otherwise provided by legislation.

7.2. The storage period for personal data is determined by the term of the contract with the client, as well as by the period necessary to fulfill obligations before state authorities.

7.3. Upon achievement of the purposes of processing, expiration of the storage period, withdrawal of consent, or termination of the contract, the Operator is obliged to cease processing and destroy the corresponding personal data within a period not exceeding 30 (thirty) calendar days, unless otherwise provided by law.

7.4. The destruction of personal data is formalized by a corresponding certificate.

8. Rights of the Data Subject

8.1. In accordance with Article 14 of the Law on Personal Data, the data subject has the right:

8.1.1. To obtain information relating to the processing of his or her personal data.

8.1.2. To request the rectification, blocking, or destruction of personal data in case it is incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the declared purpose of processing.

8.1.3. To withdraw consent to the processing of personal data.

8.1.4. To take measures to protect his or her rights.

8.2. The withdrawal of consent to processing does not terminate the processing of data if it is carried out on other legal grounds (for example, for the performance of a contract or by virtue of law).

9. Procedure for Providing Information to the Data Subject Upon Request

9.1. The data subject has the right to send a request for the provision of information relating to the processing of his or her personal data to the e-mail address of the Operator: support@cloudb2b.ru.

9.2. The request must contain the number of the principal identity document of the data subject, information on the date of issue and the authority that issued the document, as well as a handwritten signature (for an electronic document — an electronic signature).

9.3. The Operator is obliged to provide the data subject with the requested information within a period not exceeding 10 (ten) business days from the moment of receipt of the request.

10. Cross-Border Transfer of Personal Data

10.1. The databases used for the processing of personal data are hosted in the data centers of the Operator (its infrastructure contractor), at the Client's option: in the Russian Federation (Moscow), the Republic of Kazakhstan (Almaty), or the Republic of Uzbekistan (Tashkent). The hosting location is determined when placing an order based on the Client's region and is recorded in the invoice. Transfer of personal data to third countries, as well as between the said locations, is performed only upon agreement with the Client and in compliance with the requirements of

Article 12 of Federal Law No. 152-FZ, including notification of the authorized body for the protection of the rights of personal data subjects. When personal data are hosted in the Republic of Uzbekistan, processing is performed subject to the consent of personal data subjects obtained by the Client, the operator of personal data.

10.2. All personal data, as well as client data (servers, databases, backups, logs), are processed by the Operator in data centers within the location chosen by the Client when placing an order: the Russian Federation (Moscow), the Republic of Kazakhstan (Almaty), the Republic of Uzbekistan (Tashkent). Replication and transfer of data outside the chosen location are not performed, except for: (a) transfer of data between locations upon agreement with the Client in accordance with clause 10.1 of this Policy (clause 2.9 of Offer No. 1, clause 2.3.6 of Offer No. 2); (b) information processed in the technical support request system (clause 6.2.2 of this Policy) located in the Russian Federation. Servers and cloud services outside the said locations are not used for the storage of personal data, backups, and logs.

11. Use of Cookies and Analytics on the Websites

11.1. On the websites cloudb2b.ru, cloud.cloudb2b.ru, itspace13.ru the Operator uses technologies for collecting technical information (cookie files) to ensure the proper operation of the websites and to collect statistics.

11.2. Web analytics systems (Yandex.Metrika, Google Analytics and others) are not used on the Operator's websites (verified on 13 September 2026); cookie files are applied exclusively for the proper operation of the websites (language and theme selection) and for the collection of technical parameters.

11.3. Cookies collect exclusively technical parameters (device type, screen resolution, referrer source, geographic location at the region level) and are not used for identifying the identity of the user without his or her consent.

12. Liability

12.1. Persons at fault for violating the norms regulating the acquisition, processing, and protection of personal data bear the material, civil, administrative, and criminal liability provided for by the legislation of the Russian Federation.

13. Operator's Contacts

13.1. On all issues related to the processing of personal data, data subjects may contact the Operator at the following contacts:

- Email: support@cloudb2b.ru
- Phone: 8 (800) 550-67-04, 8 (8342) 37-64-04
- Address: 430005, Republic of Mordovia, Saransk, Kommunisticheskaya Street, 89.

14. Operator's Details

14.1. Full name: IT SPACE Limited Liability Company.

14.2. Abbreviated name: IT SPACE LLC.

14.3. OGRN: 1091326001018.

14.4. INN: 1326210809, KPP: 132601001.

14.5. Legal and actual address: 430005, Republic of Mordovia, Saransk, Kommunisticheskaya Street, 89.

14.6. Bank details (RUB): settlement account 40702810920000259891, correspondent account 30101810745374525104, bank: Limited Liability Company Bank Tochka, bank identifier code (BIK) 044525104.

14.7. International payment details: beneficiary customer: Ay Ti Speys (LLC); address: KOMMUNISTICHESKAYA STR., 89, SARANSK, RUSSIA; account number (RUB): 40702810920000259891; SWIFT: LCTCRUMMXXX; beneficiary bank: LIMITED LIABILITY COMPANY BANK TOCHKA; bank address: Lane. 3rd Krutitsky, bld 11, premises 7N, Moscow, Russia, 109044.