

CANDIDATE PERSONAL DATA PROCESSING POLICY

INTRODUCTION

This Policy has been developed in accordance with the requirements of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" (hereinafter — "152-FZ") and, to the extent applicable to relations involving data subjects from the European Union, the EU General Data Protection Regulation 2016/679 (GDPR).

Boilte respects every candidate's right to privacy and the protection of their personal data. We guarantee that all information you provide when your candidacy is being considered is processed in strict compliance with the law and is used exclusively for recruitment purposes. This Policy explains what data we collect, why we do it, how we protect it, and what rights you have regarding your personal data.

SECTION 1. PERSONAL DATA OPERATOR

1.1. Operator

Boilte LLC (hereinafter — the "Operator," "Boilte," "we," "us").

1.2. Contact Information

Parameter	Value
Email	hr@boilte.com
Website	www.boilte.com

1.3. Data Protection Officer

We have appointed a person responsible for organizing the processing of personal data. You can contact them at: info@boilte.com (with the note "For the Data Protection Officer").

SECTION 2. PURPOSES OF PERSONAL DATA PROCESSING

Your personal data is processed for the following purposes:

No.	Purpose of Processing	Legal Basis (152-FZ / GDPR)
1	Reviewing candidacy for a vacant position (recruitment and selection)	Art. 6 152-FZ (consent); GDPR Art. 6(1)(a) (consent), Art. 6(1)(b) (taking steps to enter into a contract)
2	Building a talent pool for future recruitment needs	Art. 9 152-FZ (consent); GDPR Art. 6(1)(a) (consent)
3	Interaction with recruitment agencies and job search platforms	Art. 6 152-FZ (consent); GDPR Art. 6(1)(a) (consent)
4	Verification of professional qualities and competencies of the candidate	Art. 6 152-FZ (consent); GDPR Art. 6(1)(a) (consent)
5	Organization of interviews and testing	Art. 6 152-FZ (consent); GDPR Art. 6(1)(a) (consent)

SECTION 3. CATEGORIES OF PERSONAL DATA PROCESSED

We process the following categories of candidates' personal data:

3.1. General Personal Data:

- Last name, first name, patronymic;
- Date and place of birth;
- Contact details (phone number, email address);
- Residential address;
- Information about education, work experience, professional skills, and qualifications;
- Information about foreign language proficiency;
- Photographs (if provided);
- Links to professional profiles (LinkedIn, others).

3.2. Special Categories of Personal Data (if provided by the candidate):

- Health information (in cases where it is necessary to assess the ability to perform a job)

function);

- Information about belonging to preferential categories of citizens.

Important: Processing of special categories of personal data is carried out only with the express written consent of the candidate.

SECTION 4. METHODS OF COLLECTING PERSONAL DATA

Candidates' personal data is collected by the following methods:

No.	Collection Method	Description
1	Direct Provision	Self-submission of resumes and accompanying documents by the candidate via email, through the website form, or in messengers
2	Receipt from Job Search Platforms	Receiving the candidate's resume through specialized platforms (hh.ru, Superjob, LinkedIn, and similar) where the candidate has made their resume publicly available
3	Receipt from Recruitment Agencies	Receiving information from recruiting companies with which Boilte cooperates
4	Conducting Interviews	Receiving information during interviews (including video interviews) and testing

SECTION 5. LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

Processing of candidates' personal data is carried out on the following legal grounds:

Legal Basis	Description
Consent to the processing of personal data (Art. 9 152-FZ; GDPR Art. 6(1)(a))	For all purposes related to reviewing the candidacy and building a talent pool
Necessity to take steps to conclude an employment contract (Art. 6 152-FZ; GDPR Art. 6(1)(b))	At the stage of pre-contractual work with a candidate whose application is being considered for a specific vacancy

SECTION 6. TERMS OF PROCESSING AND STORAGE OF PERSONAL DATA

Category of Candidates	Storage Period
Candidates with whom interviews were conducted	1 year from the date of receiving the last response from the candidate
Candidates included in the talent pool (subject to separate consent)	3 years from the date of obtaining consent, with the possibility of extension
Candidates who submitted a resume but were not selected	6 months from the date of receiving the resume
Candidates hired for a position	Data is transferred to the employee's personal file and stored in accordance with labor legislation requirements (75 years)

Upon expiration of the specified periods, personal data is subject to destruction, unless otherwise provided by the legislation of the Russian Federation.

SECTION 7. PROCEDURE FOR DESTRUCTION OF PERSONAL DATA

Destruction of personal data is carried out by a commission appointed by order of the head of Boilte, with the drawing up of a corresponding destruction act.

Destruction Methods:

- Mechanical destruction (shredding) of paper media;
- Erasing (overwriting) of electronic media;
- Incineration (for certain paper media).

Destruction is carried out in a manner that excludes the possibility of further restoration or use of personal data.

SECTION 8. LIST OF ACTIONS WITH PERSONAL DATA

We carry out the following actions with candidates' personal data:

- Collection;
- Recording;
- Systematization;
- Accumulation;
- Storage;
- Clarification (updating, changing);
- Extraction;
- Use;
- Transfer (distribution, provision, access);
- Depersonalization;
- Blocking;
- Deletion;
- Destruction.

Processing is carried out both with and without the use of automation tools. To ensure information security, we use modern information protection tools, including antivirus software, firewalls, and access control systems.

SECTION 9. TRANSFER OF PERSONAL DATA TO THIRD PARTIES

9.1. Transfer Without Separate Consent (by operation of law):

Recipient	Purpose of Transfer
Recruitment Agencies	When interacting with recruiting companies (with the candidate's consent)
Government Authorities	Upon request within their authority

9.2. Transfer with Candidate's Consent:

Recipient	Purpose of Transfer
Company Departments	For organizing interviews and evaluating the candidate
External Assessors	For conducting professional testing (with separate consent)

9.3. Cross-Border Transfer:

We carry out cross-border transfer of candidates' personal data only to countries that provide adequate protection of the rights of personal data subjects (in accordance with the EC decision on third countries or based on relevant contractual guarantees, including the EU Standard Contractual Clauses).

When transferring data to the Russian Federation, we are guided by the requirements of 152-FZ on the localization of databases (Art. 18): the recording, systematization, accumulation, and storage of personal data of Russian citizens are carried out using databases located on the territory of the Russian Federation.

SECTION 10. RIGHTS OF PERSONAL DATA SUBJECTS

10.1. Rights in accordance with 152-FZ (Russia):

No.	Right	Description
1	Right to Information	The right to receive information concerning the processing of personal data
2	Right to Rectification	The right to clarify (update, change) personal data
3	Right to Withdraw Consent	The right to withdraw consent to the processing of personal data
4	Right to Appeal	The right to appeal the actions or inaction of the Operator
5	Right to Protection	The right to protect one's rights and legitimate interests, including compensation for losses and compensation for moral damage

10.2. Rights in accordance with GDPR (for candidates from the EU):

No.	Right	GDPR Article
1	Right of Access	Art. 15
2	Right to Rectification	Art. 16
3	Right to Erasure (Right to be Forgotten)	Art. 17
4	Right to Restriction of Processing	Art. 18
5	Right to Data Portability	Art. 20
6	Right to Object	Art. 21

10.3. Procedure for Exercising Rights:

To exercise their rights, the candidate can send a request to hr@boilte.com or info@boilte.com.

The request must contain:

- Last name, first name, patronymic of the candidate;
- Contact details for communication;
- The essence of the request;
- The method of sending the response.

We undertake to review the request within 30 (thirty) days, with the possibility of extending this period by no more than 30 days, notifying the candidate.

SECTION 11. WITHDRAWAL OF CONSENT

The candidate has the right to withdraw their consent to the processing of personal data at any time by sending a written notice to hr@boilte.com.

Consequences of Withdrawal:

- Review of the candidate's application will be terminated;
- The candidate's personal data will be deleted from the system (except in cases where storage is required by law);
- The candidate will be removed from the talent pool.

SECTION 12. RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

Each candidate has the right to lodge a complaint with the competent data protection supervisory authority:

- For Russia: Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor) — www.rkn.gov.ru.
- For EU countries: The relevant national Data Protection Authority at the place of residence or work.

SECTION 13. CONTACT INFORMATION

For any questions related to the processing of candidates' personal data, you can contact:

Contact	Information
HR Department	hr@boilte.com
For the Data Protection Officer	info@boilte.com (with the note "For the Data Protection Officer")

SECTION 14. FINAL PROVISIONS

14.1. Entry into Force

This Policy comes into force from the moment of its approval and is valid indefinitely until replaced by a new version.

14.2. Current Version

The current version of the Policy is always available on the website www.boilte.com.

14.3. Amendments

We have the right to make changes to this Policy. The new version of the Policy comes into force from the moment it is posted on the website.

**APPENDIX: CANDIDATE CONSENT FORM
CONSENT TO THE PROCESSING OF PERSONAL DATA**

I,

(last name, first name, patronymic in full)

passport: series _____ No. _____, issued by _____

registered at the address:

confirm that I have read the Candidate Personal Data Processing Policy of Boilte and give my consent to the processing of my personal data, including collection, recording, systematization, accumulation, storage, clarification, extraction, use, transfer (to the extent specified in the Policy), depersonalization, blocking, deletion, destruction of my personal data, as well as to the cross-border transfer of personal data in accordance with the terms of the Policy.

This consent is valid from the date of its signing until the date of withdrawal in writing.

"" _____ 20

_____/_____/

(signature) (full name)

Approved by:
CEO of Boilte