

## **Personal data processing policy**

### **1. General Provisions**

1.1. This Policy regarding the processing of personal data (hereinafter referred to as the Policy) was developed in order to ensure the protection of human and civil rights and freedoms in the processing of his personal data, including the protection of the rights to privacy, personal and family secrets.

1.2. The Policy applies to all personal data processed by the Morpheus resource (hereinafter referred to as the Processor).

1.3. The Policy applies to relations applicable to personal data processing that arose with the Processor both before and after the approval of this Policy.

1.4. The Policy is published in the public domain on the information and telecommunication network Internet on the Processor's website <https://morpheus.digital/>.

1.5. For the purposes of applicable data protection law, **Morpheus** is typically the “data controller” of any personal information provided to us. Very occasionally, we will act on specific retainers as a “processor” (meaning that we process personal data only in accordance with the directions of a data controller, or as otherwise permitted by law).

*Please read the following information carefully to understand our views and practices regarding how we handle personal information. If you have any queries about our approach to data protection that are not already addressed in this Privacy Policy, please contact us, as per the contact details set out at the end of this Privacy Policy.*

### **Collection of Personal Information**

We may collect personal information from you in the course of our business, when you contact us or request information from us, when you instruct us to provide services, when you use our website or mobile app (or other platforms, if applicable), or as a result of your relationship with any of our personnel or clients.

#### **The personal information that we process includes:**

- Basic details, such as your name, role/title, employer/s, your relationship to a person, and your contact information (such as your email address, physical address, contact numbers);
- Identification information to enable us to check and verify your identity (e.g. your birthdate; your passport details), and information collected from publicly available resources to verify the same;
- Information relating to the matter on which you are seeking our services;
- Bank account or other financial information, if relevant or applicable to our engagement with you;
- Technical information (including your location, IP address, browser details, traffic data, location data), such as information from your visits to our website or mobile app (page interaction information, length of visits, etc.), or in relation to marketing emails we send to you;
- Personal information provided to us by or on behalf of our clients, or generated by us in the course or providing services to them, which may include special categories of personal data;
- Any other information relating to you which you may provide to us.

We may collect your personal information:

- As part of our new business intake and client on-boarding or client maintenance activities, and when you seek services from us;

- When you seek employment from us, as part of our new employee on-boarding and maintenance of the employment relationship, or when you engage with our alumni group;
- When you provide (or offer to provide) services to us, either yourself or on behalf of your employer;
- When you interact with our website or mobile app, or use any of our online services;
- When you interact with us in respect of any of our marketing communications or events;

We collect most of this information directly from you, or through your use of our website.

The information you provide may be confidential, and we will maintain such confidentiality and protect your information in accordance with our professional obligations and applicable law. We have arrangements in place with personnel and service providers who may process your personal information, to ensure that confidentiality is maintained.

1.6. Responsibility for violation of the requirements of the applicable law in the field of processing and protection of personal data is determined in accordance with the applicable law.

## **2. Purposes**

Whether we receive your personal data directly from you or from a third party, we will only use your personal information if we have obtained your consent (where necessary), or if we have another a lawful basis upon which to do so (e.g. for the performance of a contract to which you are a party, or in order to take steps at your request prior to entering into such contract; for compliance with a legal obligation on us; to protect your vital interests or those of another natural person; or for our own legitimate interests, or those of a third party, except where such interests are overridden by your own rights or interests).

**The purposes for which we process your personal information are as follows:**

- Providing services to you as well as getting services rendering by you;
- Communicating with you in respect of our developments and the promotion of our marketing-services practice;
- Managing our business relationship with you (or your organization), whether in connection with the provision of our services, the procurement of your goods and services, or as your employer (or potential or former employer), including processing payments, accounting, auditing, billing and collection and related support services;
- Complying with our legal obligations, including with respect to legal and regulatory considerations (e.g. anti-money laundering and sanctions checks, audits, enquiries by regulatory authorities);
- Managing and securing access to our premises and information technology systems, and monitoring the technology side of our operations;
- Keeping your contact details accurate and current using information provided by you, or information publicly available;
- For any purpose related and/or ancillary to any of the above or any other purposes for which your personal data was provided to us.

## **3. Cookies**

Cookies are small files that are sent to a computer's hard drive by a web server, enabling a website to remember who you are. Information from cookies may include information relating to your use of our websites, information about your computer (such as IP address and browser type), and demographic data.

For more information on how we use Cookies, please, check our [Cookie Policy](#).

#### **4. Sharing your Personal Information**

We may disclose your personal information to a recipient

- (i) for the purposes of outsourcing one or more of the purposes-related functions described above;
- (ii) to confirm or update information provided by you;
- (iii) to inform you of events, information about our services, and other important information, or
- (iv) for other purposes disclosed at or before the time the information is collected.

If we re-organise our business, we may need to transfer your personal information to other group entities or to third parties.

Additionally, we may process contact details and attendance data in the interests of public health efforts to help tackle COVID-19.

In relation to any other disclosures to third parties as necessary to provide the services as effectively as we can (for example but not limited to our professional advisors as such as lawyers and accountants, government or regulatory authorities, professional indemnity insurers, tax authorities, document processing and transaction services, corporate registries, counsel, arbitrators, mediators, clerks, witnesses, experts, third party postal and courier services), we will only do so where you have given your consent, where we are required to do so by law, or where it is necessary for the purpose of or in connection with legal proceedings or in order to exercise or defend legal rights.

We do not sell, rent, distribute, or otherwise make personal information commercially available to any third party.

#### **5. How long we keep your Personal Information**

We will retain your personal information for the length of time needed to fulfil the purposes for which it was collected, unless we specifically agree a longer retention period with you, or a longer retention period is required or permitted by law.

#### **6. Your Rights**

Various rights may be available to you, depending on the circumstances and the applicable law. We summarize key rights likely to be available to most data subjects:

- **Withdraw consent:** When personal information is processed on the basis of consent, you may withdraw consent at any time, although such withdrawal will not affect the lawfulness of processing occurring prior to such withdrawal;
- **Access and rectification, etc.:** You may request access to and rectification or erasure of personal information, or restriction of Processing concerning the Data Subject or to object to Processing as well as the right to data portability;
- **Objecting and restricting:** You may object, on legitimate grounds, to the processing of your personal information, or request that processing be restricted; and
- **Complaints:** If you believe that your data protection rights may have been breached, you may lodge a complaint with the relevant data protection authority.

If you would like to exercise any of the above rights, or any other rights available to you pursuant to applicable law, please contact us using the contact details set out on the website.

#### **7. Volume and categories of processed personal data, categories of personal data subjects**

7.1. The content and volume of processed personal data must comply with the stated processing objectives provided for in section 2 of this Policy. The processed personal data

should not be redundant in relation to the stated purposes of their processing.

7.2. The Processor can process personal data of the following categories of personal data subjects.

7.2.1. Representatives (employees) of the Processor's clients and counterparties (legal entities):

- Full Name;
- passport/ID data;
- contact details;
- the position to be replaced;
- other personal data provided by representatives (employees) of clients and counterparties, necessary for the conclusion and execution of contracts.

7.3. The Processor does not process special categories of personal data ('Sensitive data') related to race, nationality, political views, religious or philosophical beliefs, health status, intimate life, with the exception of cases provided for by the applicable law.

## **8. The procedure and conditions for the processing of personal data**

8.1. The processing of personal data is carried out with the consent of the subjects of personal data to the processing of their personal data, as well as without such consent in the cases provided for by the applicable law.

8.2. The Processor carries out both automated and non-automated processing of personal data.

8.3. The Processor's employees are allowed to process personal data whose job responsibilities include the processing of personal data.

- 8.4. The processing of personal data is carried out by:
- receiving personal data orally and in writing directly from the subjects of personal data;
  - obtaining personal data from publicly available sources;
  - entering personal data into the logs, registers and information systems of the Processor;
  - using other methods of processing personal data.

8.5. Disclosure to third parties and dissemination of personal data without the consent of the subject of personal data is not allowed, unless otherwise provided by applicable law.

8.6. The transfer of personal data to the bodies of inquiry and investigation and other authorized executive bodies and organizations is carried out in accordance with the requirements of the applicable law.

8.7. The Processor takes the necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, alteration, blocking, distribution and other unauthorized actions, including:

- identifies threats to the security of personal data during their processing;
- adopts local regulations and other documents regulating relations in the field of processing and protection of personal data;
- appoints persons responsible for ensuring the security of personal data in structural divisions and information systems of the Processor;
- creates the necessary conditions for working with personal data;
- organizes the accounting of documents containing personal data;
- organizes work with information systems in which personal data are processed;
- stores personal data in conditions under which their safety is ensured and unlawful access to them is excluded;

- organizes training for the Processor's employees who process personal data.

8.8. The Processor stores personal data in a form that allows determination of the subject of personal data, no longer than the purpose of processing personal data requires, if the storage period for personal data is not established by the applicable law.

### **9. Updating, correcting, deleting and destroying personal data, responding to requests from subjects for access to personal data**

9.1. Confirmation of the fact of processing of personal data by the Processor is provided by the Processor to the subject of personal data or his representative when contacting or upon receiving a request from the subject of personal data or his representative.

The information provided does not include personal data relating to other subjects of personal data, unless there are legal grounds for disclosing such personal data.

The request must contain:

- number of the main identity document of the subject of personal data or his representative, information on the date of issue of the said document and the issuing authority;
- information confirming the participation of the subject of personal data in relations with the Processor (contract number, date of the contract, conditional verbal designation and (or) other information), or information otherwise confirming the fact of processing of personal data by the Processor;
- signature of the subject of personal data or his representative.

The request can be sent in the form of an electronic document and signed with an electronic signature in accordance with the applicable law.

If the request of the subject of personal data does not reflect all the necessary information in accordance with the applicable law or the subject does not have the right to access the requested information, then a reasoned refusal is sent to him.

The right of the subject of personal data to access his personal data may be limited in accordance with the applicable law, including if the access of the subject of personal data to his personal data violates the rights and legitimate interests of third parties.

9.2. In case of revealing inaccurate personal data when the subject of personal data or his representative contacts requesting it or at the request of the authorized body for the protection of the rights of subjects of personal data, the Processor blocks personal data related to this personal data subject from the moment of such a request or receipt of the specified request for the verification period, if the blocking of personal data does not violate the rights and legitimate interests of the personal data subject or third parties.

In case of confirmation of the fact of inaccuracy of personal data, the Processor, based on the information provided by the subject of personal data or his representative or the authorized body for the protection of the rights of subjects of personal data, or other necessary documents, clarifies the personal data and removes the blocking of personal data.

9.3. In the event that unlawful processing of personal data is revealed when the subject of personal data or his representative or the authorized body for the protection of the rights of subjects of personal data applies (request), the Processor blocks the unlawfully processed personal data related to this subject of personal data from the moment of such a request or receipt of the request.

9.4. Upon reaching the goals of processing personal data, as well as in the event that the subject of personal data revokes consent to their processing, personal data are subject to destruction if:

- otherwise is not provided by the contract, the party to which, the beneficiary or the guarantor of which is the subject of personal data;

- the Processor is not entitled to carry out processing without the consent of the subject of personal data on the grounds provided for by the applicable law;
- otherwise is not provided by another agreement between the Processor and the subject of personal data.

### **10. Changes to this Privacy Policy**

We may from time to time make changes to this Privacy Policy. Where these are likely to be material, we will communicate these in advance. Otherwise, these will become effective once the amended Privacy Policy is posted on our website. Please check back regularly to keep informed of updates to this Privacy Policy.