

APPROVED BY the order of "SberTech" JSC No.

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### **GitVerse Privacy Policy**

Version 2.01.

The GitVerse Privacy Policy specifies the SberTech Policy № PT SBT 09-015 "Processing and Protection of Personal Data" regarding personal data processing through the GitVerse, GigaCode, GigaIDE Cloud, and the GitVerse AI Cup.

#### 1. TERMS ANS DEFINITIONS

- **1.1. Personal data** is any information relating to an identified or identifiable natural person (data subject), including surname, first name, patronymic, email address, phone number, login, etc.
- 1.2. Processing of personal data is any action (operation) or a set of actions (operations) performed with personal data using automation tools or without using such tools, including collection (receipt), recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction of personal data.
- **1.3. Operator** a state body, municipal body, legal or natural person, independently or jointly with other persons organizing and/or carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, and actions (operations) performed with personal data.
- **1.4.** User an adult, fully capable individual who has reached the age of 18 (eighteen) years, who has entered into a User Agreement with SberTech for the use of GitVerse, a User Agreement for the use of the GigaIDE Cloud product, a User Agreement for the use of GigaCode, and/or a Participant Agreement for the GitVerse AI Cup.
- **1.5. SberTech** Joint Stock Company "Sberbank Technologies" ("SberTech" JSC),TIN 7736632467, OGRN 1117746533926, address: 117105, Moscow, Novodanilovskaya Naberezhnaya, 10.
- **1.6.** The GitVerse website is a website on the "Internet" network, located at gitverse.ru and its subdomain addresses.

**1.7. The GitVerse AI Cup website** is a website on the "Internet" network, located at the address dsworks.ru and its subdomain addresses.

#### 2. GENERAL TERMS OF PERSONAL DATA PROCESSING

- **2.1.** The entity organizing and processing the personal data of visitors to the GitVerse/GitVerse AI Cup Site and Users in connection with their use of the GitVerse, GigaCode services, the GigaIDE Cloud product, and/or the GitVerse AI Cup for the purposes defined in this Privacy Policy is SberTech.
- **2.2.** SberTech, acting as an independent Operator, may process personal data obtained directly from the data subject or automatically transmitted from their devices, as well as from third parties, provided that they confirm the existence of a proper legal basis for the transfer of such personal data to SberTech.
- **2.3.** SberTech processes personal data using databases located on the territory of the Russian Federation and does not transfer them to foreign states' authorities, foreign individuals, or foreign legal entities.
- **2.4.** The processing of personal data organized and carried out by SberTech is limited to achieving specific, predetermined, and lawful purposes defined by the <u>Policy of the Joint Stock Company</u>. "SberTech" PT SBT 09-015 "Processing and Protection of Personal Data" and specified in section 3 of this GitVerse Privacy Policy.
- **2.5.** In the event of achieving the purposes of personal data processing, the loss of necessity in achieving the purposes of their processing, the identification of unlawful processing of personal data, or the withdrawal by the data subject of consent to the processing of their personal data, SberTech ceases the processing of personal data in accordance with the applicable legislation.
- **2.6.** When visiting the GitVerse Site/GitVerse AI Cup Site and using the services of GitVerse, GigaCode, the GigaIDE Cloud product, and/or the GitVerse AI Cup, visitors to the GitVerse Site, GitVerse AI Cup Site, and Users may navigate to resources owned by third parties (third-party sites and services) where processing, including the collection, of personal data is carried out. SberTech is not responsible for the processing of personal data by the specified third parties, who independently (without the involvement of SberTech) organize the processing of personal data and determine the purposes of such processing, the composition of the personal data to be processed, and the actions (operations) performed with them.
- **2.7.** Detailed information on the principles, cases, procedures, and conditions for the processing of personal data organized and/or carried out by SberTech, as well as information on the implemented requirements for the protection of personal data, is presented in the Policy of "SberTech" JSC PT SBT 09-015 "Processing and Protection of Personal Data".

#### 3. PURPOSES OF PERSONAL DATA PROCESSING

## 3.1. Ensuring the proper, safe, and uninterrupted operation of the GitVerse Website and the GitVerse AI Cup Website and their Improvement

To provide visitors of the GitVerse Website and the GitVerse AI Cup Website with the ability to use them, as well as to ensure their correct, uninterrupted, and safe operation, SberTech processes automatically collected information about Visitors, including: information about visits and actions taken, as well as information about the device and browser used, and some other data necessary to achieve the specified purpose, stored in Cookies files.

The legal basis for the processing of personal data for the specified purpose is the necessity of such processing, which does not violate the rights of personal data subjects, for the exercise of the rights and legitimate interests of SberTech.

## 3.2. Provision of GitVerse services, GigaCode, the GigaIDE Cloud product, and ensuring the ability to use their functionality

To provide the services of GitVerse, GigaCode, the GigaIDE Cloud product, and to ensure the possibility of using their functionality in accordance with the User Agreement for the use of the GitVerse service, including providing access and interaction on issues of provision and use, SberTech may process the following personal data of Users: username; first name; last name; country; city; email address; phone number; registration date; photographic image or other graphical representation of the User; identifier(s) in instant messaging system(s); assigned identifiers; website address specified by the User in the field. "Website"; information about education and training; information about the organization; information about the User's actions.

In cases where the provision of GitVerse, GigaCode services, the GigaIDE Cloud product, or the functionality of these services used by the User does not require the processing of the entire set of the aforementioned personal data, SberTech processes only some of them.

The legal basis for processing personal data for the aforementioned purpose is the User Agreement for the use of the GitVerse service, the User Agreement for the use of GigaCode, and the User Agreement for the use of the GigaIDE Cloud product.

Access to the GitVerse service can be provided using the following third-party authorization services, to which SberTech may entrust the processing of certain personal data of Users or transfer individual personal data of Users, provided there is a proper legal basis for such transfer:

**Sber ID Service** (Public Joint-Stock Company "Sberbank Russia, OGRN 1027700132195; TIN 7707083893; address: 117997, Moscow, Vavilova St., 19);

**Cloud ID Service** (Limited Liability Company "Cloud Technologies", OGRN 5167746080057; TIN 7736279160; address: 117312, Moscow, Vavilova St., 23, bldg. 1, room No. 1.207).

**Giga ID Service** (Limited Liability Company "Cloud Technologies", OGRN 5167746080057; TIN 7736279160; address: 117312, Moscow, Vavilova St., 23, bldg. 1, room No. 1.207).

#### 3.3. Provision of the GitVerse AI Cup and ensuring the ability to use its functionality

To provide the GitVerse AI Cup and ensure the ability to use its functionality in accordance with the User Agreement of the GitVerse AI Cup participant, including providing access, interaction on issues of provision and use, SberTech may process the following personal data of Users: last name, first name, patronymic; date of birth; email address; phone number; username (login); information about place of work (study); country and city of residence; information about User actions (including information on participation in ranking/rankings); assigned identifiers.

SberTech processes only those personal data from the list above that are necessary to provide the GitVerse AI Cup or specific functionality of it that the User utilizes.

The legal basis for the processing of personal data for the aforementioned purpose is the User Agreement of the GitVerse AI Cup participant, of which the User is a party.

Access to the GitVerse AI Cup can be provided using the following third-party authorization services, to which SberTech may entrust the processing of certain personal data of Users or transfer individual personal data of Users, provided there is a proper legal basis for such transfer:

**Service Sber ID** (Public Joint-Stock Company "Sberbank Russia, OGRN 1027700132195; TIN 7707083893; address: 117997, Moscow, Vavilova St., 19);

Cloud ID Service (Limited Liability Company "Cloud Technologies", OGRN 5167746080057; TIN 7736279160; address: 117312, Moscow, Vavilova St., 23, bldg. 1, room No. 1.207).

# 3.4. Review of requests (applications) regarding the connection and use of SberTech services and products

For the purpose *of reviewing requests (applications)*, SberTech processes the following personal data of Users and visitors of the GitVerse/GitVerse AI Cup Website: last name, first name, patronymic; email address; information about the educational organization (name, type); position; assigned identifiers.

The legal basis for the processing of the aforementioned personal data is consent to the processing of personal data.

#### 3.5. Interaction on Contract Conclusion Issues

For interaction regarding contract conclusion (including based on relevant applications), SberTech processes the following personal data of employees and representatives of partners and counterparties (including potential ones): last name, first name, patronymic (if available), position, information about the represented organization (name, TIN), contact phone number, and corporate email address.

The legal basis for processing the aforementioned personal data may be either consent to the processing of personal data or the necessity of such processing for the conclusion of a contract at the initiative of the data subject or a contract under which the data subject will be a beneficiary or guarantor.

#### 3.6. Implementation of informational and marketing communications

For the purpose of providing information related to the use of GitVerse services, GigaIDE Cloud, the GigaCode product, and the GitVerse AI Cup, as well as for marketing communications (including providing information about services, products, and events and conducting marketing research), SberTech may process the following personal data: first name; last name; email address; phone number; information about participation in events and competitions.

SberTech, for the purpose of conducting informational and marketing communications with the consent of the personal data subject, is entitled to entrust the processing of personal data to the Limited Liability Company "Solutions for Email Distributions" (TIN 7805753176; OGRN: 1197847144021; address: 198207, Saint Petersburg, Tramvayny pr-t, 12, bldg. 2, letter A, apartment room 4-N).

The legal basis for the processing of the aforementioned personal data is consent to the processing of personal data for the purposes of carrying out informational and marketing communications.

The data subject has the right to demand the cessation of the processing of personal data for the purposes of informational and marketing communications at any time by withdrawing the corresponding consent.

#### 3.7. Consideration of requests (inquiries) from personal data subjects

For the purpose of reviewing requests (inquiries) from personal data subjects, SberTech processes the following personal data: last name; first name; patronymic; username; email address; information and details of the identity document (including series, number, date and place of issue, and information about the issuing authority); information contained in the document confirming the representative's authority; information confirming the personal data subject's participation in relations with us as a personal data operator; information confirming the fact of our processing of their personal data; personal signature of the personal data subject or their representative.

The volume of personal data we process for the specified purpose depends on the subject of the request from the data subjects and the requirements of the applicable legislation for the respective requests.

The legal basis for processing the aforementioned personal data is the necessity to fulfill the obligations imposed on us by legislation in the field of personal data as a personal data operator.

#### 4. COOKIES

- **4.1.** When providing the GitVerse Site, the GitVerse AI Cup Website, as well as the GitVerse services, GigaIDE Cloud, the GigaCode product, and the GitVerse AI Cup, SberTech uses Cookies and applies certain metric programs (services).
- **4.2.** Visitors of the GitVerse Website, GitVerse AI Cup Website, as well as Users of GitVerse services, GigaIDE Cloud, the GigaCode product, and the GitVerse AI Cup, can independently configure the use of Cookies, including prohibiting it, in the settings of their browser.
- **4.3.** For more information about Cookies and the third-party services we engage, see the Cookie Usage Policy.

### 5. RIGHTS OF PERSONAL DATA SUBJECTS AND METHODS OF THEIR IMPLEMENTATION

- **5.1.** With regard to the processing of personal data organized and carried out by SberTech, data subjects have, among other things, the following rights:
  - to freely, voluntarily, and in one's own interest give consent to the processing of personal data;
  - to receive information regarding the processing of their personal data, including access to their personal data, in the manner, form, and timeframes established by personal data legislation;
  - to request clarification of their personal data or its blocking or destruction in the event that such personal data is incomplete, outdated, inaccurate, unlawfully obtained, or not necessary for the declared purpose of processing;
  - to withdraw one's consent to the processing of personal data;
  - to demand the cessation of processing personal data for the purpose of promoting goods, works,
    services in the market through direct contacts with potential

consumer using communication means;

- take measures provided by the current legislation to protect their rights;
- as well as other rights provided by the legislation in the field of personal data.
- **5.2.** To exercise their rights, a personal data subject and another person acting in the interests of personal data subjects may send a request (inquiry) to SberTech, including in one of the following ways:
  - at the address: 117105, Russian Federation, Moscow, Novodanilovskaya Naberezhnaya 10;
  - to the email: privacy@sbertech.ru.
- **5.3.** A request from the data subject may be submitted personally or through a representative.

A request from a personal data subject may be submitted in any form, in compliance with the requirements of current legislation, including the requirements for the content of requests from personal data subjects.

- **5.4.** The response to the request (inquiry) of the personal data subject is sent in the same form in which the corresponding request (inquiry) was received, or, if SberTech has the objective capability, in the form specified in the corresponding request (inquiry) of the personal data subject.
- **5.5.** The User's personal data can be updated by the User independently using the relevant functionality of the User Account by editing the fields provided therein.

The destruction of the User's personal data can also be carried out independently by the User using the "delete account" functionality.

#### 6. GITVERSE PRIVACY POLICY ACTION

- **6.1.** The GitVerse Privacy Policy is effective from the moment it is published (posted on the GitVerse Website: gitverse.ru) and remains in effect indefinitely until it is revoked or revised.
- **6.2.** SberTech reserves the right to unilaterally and at its own discretion make changes to this GitVerse Privacy Policy, in particular, when the established conditions for processing personal data change or when it is necessary to update it to comply with applicable legislation.

Changes to the GitVerse Privacy Policy are made by publishing the GitVerse Privacy Policy in a new edition, and users of the GitVerse Service may be notified of this if necessary.

#### 7. CONTACT DETAILS

- **7.1.** Responsible for organization processing of personal data in SberTech: privacy@sbertech.ru.
- **7.2.** Technical support: support@gitverse.ru.