

WIT Pharma Limited Liability Company

Personal Data Processing Policy

APPROVED by the General Director of WIT Pharma LLC, D. F. Klimchuk; approval date 15 January 2026.

1. General

This Policy sets out how WIT Pharma LLC (the “Operator”) processes and protects personal data and is prepared in accordance with Russian Federal Law No. 152-FZ of 27 July 2006 “On Personal Data”.

Operator details: WIT Pharma LLC, OGRN 1137746005198, INN 7729729669, KPP 770301001, address: 12 Presnenskaya Naberezhnaya, Federation Tower, floor 45, office 82, Moscow, 123112, Russia. Contact for data matters: info@witpharma.com.

This Policy applies to personal data the Operator receives from users of witpharma.com, including via the contact form.

2. Data processed

The Operator processes personal data voluntarily provided by the user: name, email address and information contained in the message. The website may process technical data (cookies, IP address, browser information) to operate and secure the site.

3. Purposes

- handling user enquiries and requests submitted through the website;
- contacting the user to respond and discuss possible cooperation;
- operating, securing and improving the website.

4. Legal basis

Processing is based on the consent of the data subject given when submitting an enquiry through the website form, and on other legal grounds provided by the law of the Russian Federation.

5. Procedure and retention

Personal data is processed with and without automation. Data is retained no longer than necessary for the purposes of processing, after which it is deleted or anonymized. Consent may be withdrawn at any time by writing to info@witpharma.com.

6. Disclosure to third parties

The Operator does not sell or share personal data with third parties, except as required by law or where processors (e.g. email and hosting providers) act on the Operator's instructions and are bound to ensure confidentiality and security.

7. Data protection

The Operator takes the necessary legal, organizational and technical measures to protect personal data against unlawful access, destruction, alteration, blocking, copying and distribution.

8. Rights of the data subject

The data subject may obtain information about the processing of their personal data, request its rectification, blocking or deletion, and withdraw consent. To exercise these rights, write to info@witpharma.com.

9. Changes

The Operator may amend this Policy. The current version is published at witpharma.com.

General Director, WIT Pharma LLC

_____ / D. F. Klimchuk

Approved document. The original bearing signature and seal is available on request.