

APPROVED

by order of IPURC PHARM CO

POLICY ON THE PROCESSING OF PERSONAL DATA
IPURC

English version based on the source policy structure, with the brand name changed from BIONOX to IPURC.

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List of Terms

Personal data - any information relating directly or indirectly to an identified or identifiable natural person (the personal data subject).

Personal data operator / data user - a legal entity or other person that independently or jointly organizes and/or carries out the processing of personal data and determines the purposes, scope and operations of such processing.

Processing of personal data - any operation or set of operations performed with or without automation, including collection, recording, systematization, accumulation, storage, clarification, updating, modification, retrieval, use, transfer, distribution, provision, access, depersonalization, blocking, deletion and destruction of personal data.

Automated processing of personal data - processing of personal data by means of computing or information technology.

Distribution of personal data - actions aimed at disclosure of personal data to an indefinite group of persons.

Provision of personal data - actions aimed at disclosure of personal data to a specific person or a specific group of persons.

Blocking of personal data - temporary suspension of processing of personal data, except where processing is necessary to clarify such personal data.

Destruction of personal data - actions that make it impossible to restore the contents of personal data in a personal data information system and/or actions that destroy tangible media containing personal data.

Depersonalization of personal data - actions that make it impossible, without additional information, to identify the personal data as belonging to a specific personal data subject.

Personal data information system - a set of personal data contained in databases and the information technologies and technical means enabling the processing of such personal data.

Cross-border transfer of personal data - transfer of personal data to the territory of a foreign state, to a foreign authority, foreign individual or foreign legal entity.

1. General Provisions

1.1. This document defines the policy of IPURC concerning the processing of personal data.

1.2. IPURC acts as a personal data operator / data user within the meaning of applicable data protection legislation where it determines the purposes and means of processing personal data.

1.3. This Policy has been prepared with reference to the structure of the source Russian personal data policy and, where applicable, the requirements of Federal Law of the Russian Federation No. 152-FZ dated 27 July 2006 "On Personal Data". For Hong Kong operations, it also reflects the general compliance approach of the Personal Data (Privacy) Ordinance (Cap. 486).

1.4. This Policy applies to any action or set of actions performed with personal data, whether automated or non-automated, including collection, recording, systematization, accumulation, storage, updating, retrieval, use, transfer, provision, access, depersonalization, blocking, deletion and destruction.

1.5. This Policy shall be reviewed and, where necessary, updated in the event of changes to applicable personal data legislation, changes in IPURC business processes, or changes in the purposes and methods of personal data processing.

1.6. This English document is intended as a business policy template. Before publication or official use, it should be reviewed by qualified counsel in the jurisdictions where IPURC operates and where personal data subjects are located.

IPURC Contact Details

Contact: Eric.Ada (sales manager)

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2. Principles of Personal Data Processing

IPURC processes personal data on the basis of the following principles:

1. Personal data shall be processed lawfully and fairly.
2. Personal data shall be processed only for specific, predetermined and lawful purposes. Processing incompatible with the purposes of collection is not permitted.
3. Databases containing personal data processed for incompatible purposes shall not be combined, unless such combination is permitted by applicable law and supported by a lawful basis.
4. Only personal data that corresponds to the stated processing purposes shall be processed.
5. The content and volume of processed personal data shall correspond to the stated processing purposes and shall not be excessive.
6. When processing personal data, IPURC shall seek to ensure accuracy, sufficiency and, where necessary, relevance of personal data in relation to the purposes of processing. Reasonable measures shall be taken to delete or clarify incomplete or inaccurate data.
7. Personal data shall be stored in a form that permits identification of a personal data subject no longer than is necessary for the stated purposes, unless a longer period is established by law, contract or legitimate business requirement. Personal data shall be destroyed or depersonalized upon achievement of the processing purposes or loss of necessity, unless otherwise provided by law.
8. Personal data shall be protected against unauthorized access, accidental loss, destruction, alteration, disclosure or other unlawful processing.

3. Legal Grounds for Personal Data Processing

IPURC may process personal data on the following legal grounds, to the extent applicable:

9. Performance of applicable laws and regulations, including employment, accounting, tax, archiving, occupational safety, industrial safety, medicine circulation and personal data protection requirements.
10. Conclusion and performance of contracts between IPURC and the personal data subject, customer, supplier, contractor, employee or other relevant person.
11. Consent of the personal data subject, where consent is required by applicable law or where no other legal basis is available.
12. Protection of life, health, safety, property, legal rights and legitimate interests where permitted by applicable law.
13. Compliance with requests or obligations imposed by competent authorities, courts or regulators, where such requests or obligations are lawful and binding.

The following legal acts from the source policy are retained as references where the processing concerns the Russian Federation or Russian citizens:

- Federal Law No. 152-FZ dated 27 July 2006 "On Personal Data";
- Labor Code of the Russian Federation No. 197-FZ dated 30 December 2001;
- Resolution of the State Statistics Committee of the Russian Federation No. 1 dated 5 January 2004 on unified primary accounting forms for labor and payroll;
- Federal Law No. 125-FZ dated 22 October 2004 "On Archival Affairs in the Russian Federation";
- Order of the Minister of Defence of the Russian Federation No. 700 dated 22 November 2021;
- Federal Law No. 402-FZ dated 6 December 2011 "On Accounting";
- Tax Code of the Russian Federation, Part Two, No. 117-FZ dated 5 August 2000;
- Procedure for occupational safety training and testing of occupational safety knowledge, approved by Resolution No. 1/29 dated 13 January 2003;
- Federal Law No. 116-FZ dated 20 June 1997 "On Industrial Safety of Hazardous Production Facilities";
- Federal Law No. 59-FZ dated 2 May 2006 "On the Procedure for Considering Applications of Citizens of the Russian Federation";
- Federal Law No. 61-FZ dated 12 April 2010 "On Circulation of Medicines";
- Government Resolution No. 687 dated 15 September 2008 on the specifics of non-automated personal data processing.

4. Procedure and Conditions for Personal Data Processing

4.1. IPURC processes personal data by automated and non-automated means, including collection, recording, systematization, accumulation, storage, clarification, updating, retrieval, use, transfer, provision, access, depersonalization, blocking, deletion and destruction.

4.2. IPURC shall not provide or disclose personal data to third parties without the consent of the personal data subject, except where disclosure is necessary to protect life or health, to perform a contract, to comply with law, or in other cases permitted by applicable legislation.

4.3. Consent to the processing of personal data may be provided by the personal data subject or the subject's authorized representative in a form that enables confirmation that consent has been obtained.

4.4. IPURC may transfer personal data to third parties or engage another person to process personal data on behalf of IPURC where there is an appropriate legal basis and, where required, an agreement or data processing instruction.

4.5. If IPURC instructs another person to process personal data, IPURC shall require such person to comply with the principles and rules for personal data processing. IPURC remains responsible to the personal data subject where required by law, while the processor is responsible to IPURC for compliance with the processing instruction.

4.6. Cross-border transfer of personal data shall be carried out only where permitted by applicable law and where appropriate safeguards, consent, contractual measures, or other lawful mechanisms are in place.

4.7. IPURC and persons who obtain access to personal data shall not disclose or distribute personal data without the personal data subject's consent unless otherwise provided by law.

4.8. Where personal data has not been obtained directly from the personal data subject, IPURC shall provide notice of processing unless the subject has already been notified, the data was obtained for performance of a

contract or law, the data was made publicly available by the subject, or the processing is performed for statistical or research purposes without violating rights and legitimate interests.

4.9. Where personal data of citizens of the Russian Federation is collected, IPURC shall consider the data localization requirements applicable under Russian personal data legislation, including requirements concerning recording, systematization, accumulation, storage, updating and retrieval using databases located in the Russian Federation where applicable.

4.10. IPURC shall adopt legal, organizational and technical measures required to comply with applicable personal data laws, including appointment of responsible persons, adoption of local policies, internal control, risk assessment, employee awareness and security safeguards.

4.11. IPURC shall take reasonable security measures, including identification of security threats, access control, logging where appropriate, protection against unauthorized access, recovery measures and control of storage media.

4.12. Processing of personal data shall cease upon achievement of the processing purposes, expiry or withdrawal of consent, loss of necessity, or discovery of unlawful processing, unless continued processing is required or permitted by law.

4.13. Non-automated processing of personal data shall be organized in a manner that prevents unauthorized access and protects paper and other tangible media containing personal data.

5. Rights of Personal Data Subjects

A personal data subject may have the following rights in relation to personal data, subject to applicable law:

14. Right to obtain confirmation of whether personal data is being processed by IPURC.
15. Right to obtain information about the legal grounds and purposes of personal data processing.
16. Right to receive a list or description of personal data being processed.
17. Right to receive information about the methods of processing used by IPURC.
18. Right to receive the name and location/contact details of IPURC and information about persons who have access to personal data or to whom personal data may be disclosed under contract or law.
19. Right to receive information about the source of personal data, unless a different procedure is established by law.
20. Right to receive information about processing and storage periods.
21. Right to receive information on the procedure for exercising rights under applicable personal data legislation.
22. Right to receive information about cross-border transfer of personal data, where applicable.
23. Right to request clarification, updating, blocking or deletion of personal data if it is incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the stated purpose.
24. Right to withdraw consent to processing of personal data where processing is based on consent.
25. Right to request cessation of processing of personal data, subject to applicable law.
26. Right to lodge a complaint with a competent supervisory authority or seek judicial protection, where provided by law.

6. Procedure for Exercising the Rights of Personal Data Subjects

6.1. A personal data subject may exercise rights by contacting IPURC personally, through an authorized representative, by written request, or by email using the contact details in this Policy.

6.2. A request should contain information enabling IPURC to identify the requester and the relevant relationship with IPURC. Depending on applicable law, this may include identity document details, contract details, transaction details, email address, or other information confirming the fact of processing.

- 6.3. A request should be signed by the personal data subject or representative, unless submitted through an authenticated electronic channel or another legally acceptable method.
- 6.4. IPURC shall respond to requests within the time period required by applicable law. Where Russian Federal Law No. 152-FZ applies, information is generally provided within ten business days, with a possible extension of not more than five business days where a motivated notice of extension is sent.
- 6.5. Where information has already been provided, a repeated request may be submitted after the statutory waiting period unless a shorter period is established by law, regulation or contract.
- 6.6. Where the subject provides evidence that processed personal data is incomplete, inaccurate or outdated, IPURC shall make necessary changes within the time period required by applicable law.
- 6.7. Where the subject provides evidence that personal data was unlawfully obtained or is no longer necessary for the stated purpose, IPURC shall delete or otherwise cease processing such data within the time period required by applicable law.
- 6.8. IPURC shall notify the personal data subject or representative of changes made and measures taken, and shall take reasonable steps to notify third parties to whom the relevant personal data has been transferred.
- 6.9. Where consent is withdrawn, IPURC shall cease processing or ensure cessation of processing and delete the relevant personal data, unless continued storage or processing is required or permitted by law, contract or other lawful basis.
- 6.10. If immediate destruction is impossible, IPURC shall block the relevant personal data and destroy it within the legally permitted period.

7. Applicable Data Protection Rules and Laws

This section summarizes the rules reflected in this Policy. It is not a substitute for legal advice and should be reviewed before public use.

7.1. Russian Federation personal data rules

Where IPURC processes personal data in relation to the Russian Federation or Russian citizens, the key reference is Federal Law No. 152-FZ "On Personal Data". The source policy specifically refers to Articles 14, 18.1 and 19, which concern data subject access information, operator compliance measures, and personal data security measures. The source policy also refers to Russian data localization requirements for databases used for specified processing operations involving personal data of Russian citizens.

7.2. Hong Kong personal data rules

For IPURC operations in Hong Kong, the Personal Data (Privacy) Ordinance (Cap. 486) is a key privacy law. Its Data Protection Principles address collection, accuracy and retention, use, security, transparency and access/correction of personal data. IPURC should ensure that collection and use notices, consent processes, direct marketing practices, retention schedules and data security measures are aligned with Hong Kong requirements where applicable.

7.3. International and cross-border processing

Where personal data is transferred across borders, IPURC should evaluate destination country rules, transfer restrictions, contractual safeguards, data localization requirements, security obligations and consent requirements. Cross-border transfers should be documented and performed only on a lawful basis.

7.4. Website-specific practices

If this Policy is used on a website, IPURC should separately specify the types of data collected through the website, including contact forms, cookies, analytics data, device data, IP addresses, email communication

records and account data. Cookie notices and consent mechanisms should be added where required by applicable law.

Appendix A

Request Form for Information Concerning Processing of Personal Data

To: IPURC

From: _____

Full name of personal data subject: _____

Identity document / passport: _____

Issued on: _____ Issued by: _____

Information confirming the relationship with IPURC: _____

In accordance with applicable personal data legislation, I request the following information:

- ☐ confirmation of processing of my personal data;
- ☐ legal grounds and purposes of processing;
- ☐ methods of processing;
- ☐ name and location/contact details of IPURC and information on persons with access to my personal data;
- ☐ personal data relating to me and the source of such data;
- ☐ processing and storage periods;
- ☐ procedure for exercising my rights;
- ☐ information on actual or intended cross-border transfer;
- ☐ name/address of a person processing my personal data on behalf of IPURC;
- ☐ other information: _____

Please provide the information:

☐ in writing to the following address: _____

☐ by email to: _____

Date: _____ Signature: _____

Appendix B

Request Form from a Representative of a Personal Data Subject

To: IPURC

From representative: _____

Identity document / passport: _____

Issued on: _____ Issued by: _____

Acting on the basis of: _____

Personal data subject represented: _____

Subject identity document: _____

Information confirming the subject's relationship with IPURC: ____

I request the following information concerning the personal data subject:

☐ confirmation of processing;

☐ legal grounds and purposes of processing;

☐ methods of processing;

☐ IPURC contact details and information about persons with access;

☐ personal data and source of data;

☐ processing and storage periods;

☐ procedure for exercising rights;

☐ information on cross-border transfer;

☐ person processing data on behalf of IPURC;

☐ other information: _____

Please provide the information:

☐ in writing to: _____

☐ by email to: _____

Date: _____ Signature: _____

Appendix C

Withdrawal of Consent to Personal Data Processing

To: IPURC

I, _____

(full name)

Identity document / passport: _____

Issued on: _____ Issued by: _____

hereby withdraw my consent to the processing of my personal data for the following purposes:

Reason for withdrawal (optional):

Date: _____ Signature: _____

Appendix D

Withdrawal of Consent by a Representative of a Personal Data Subject

To: IPURC

I, _____

(full name of representative)

Identity document / passport: _____

Issued on: _____ Issued by: _____

Acting on the basis of: _____

on behalf of: _____

(full name of personal data subject)

Subject identity document: _____

hereby withdraw consent to processing of the personal data subject's personal data for the following purposes:

Reason for withdrawal (optional):

Date: _____ Signature: _____

Appendix E

Company Contact Details

Contact: Eric.Ada (sales manager)

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Publication note

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