

The company's policy with regard to processing of personal data

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1. GENERAL PROVISIONS

Personal Data Policy (hereinafter - the Policy) was developed in accordance with the Federal Law of 27.07.2006. №152-FZ "On Personal Data" (hereinafter - FL-152).

This policy defines the order of processing of personal data and measures to ensure the security of personal data for the purpose of protecting the rights and freedoms of man and citizen in the processing of their personal data, including the protection of the rights to privacy, personal and family privacy.

The policy uses the following basic concepts:

automated processing of personal data - processing of personal data via computer equipment;

blocking of personal data - suspension of processing of personal data (except in cases where the processing is necessary to clarify personal data);

information system of personal data - aggregate contained in the databases of personal information data, and providing their information processing technologies and equipment;

depersonalization of personal data - action, as a result of which it is impossible to determine without more information, the personal data belonging to a particular subject of personal data;

processing of personal data - any action (operation) or a set of actions (operations) performed with the use of automation equipment or without the use of such means with personal data, including collection, recording, accumulation, storage, clarification (update, modification), extraction, use, transfer (distribution, provision of access), depersonalization, blocking, deletion, destruction of personal data;

operator - State authorities, municipal bodies, legal or natural person, alone or together with others, organizing and (or) carrying out the processing of personal data, as well as defining the purpose of processing personal data, the composition of the personal data to be processed, the actions (operations) in respect of personal data;

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

the provision of personal data - actions aimed at the disclosure of personal data to a certain person or a certain group of people;

dissemination of personal data - actions aimed at the disclosure of personal data to an indefinite number of persons (transfer of data) or to become acquainted with the personal data of the general public, including the disclosure of personal data in the media, placement in the information and telecommunications networks or the provision of access to personal data in any other way or otherwise;

cross-border transfer of personal data - transfer of personal data to a foreign country to the authority of a foreign state, a foreign person or foreign legal entity;

destruction of personal data - action, as a result of which it is impossible to restore the contents of personal data in the information system of personal data and (or) the result of which destroyed the material carriers of personal data.

Company must publish or otherwise provide unrestricted access to this policy of personal data in accordance with b. 2 tbsp. 18.1. FZ-152.

2. The principles and conditions of personal data processing

2.1 Principles of personal data processing

Processing of personal data from the Operator is based on the following principles:

- the rule of law and fair manner;
- processing of personal data limited to the achievement of specific, pre-defined and legitimate purposes;
- avoid processing personal data incompatible with the personal data collection purposes; preventing association database containing personal data, which processing is performed in order that are inconsistent with each other;
- process only personal data that meet their treatment goals;
- conformity of the content and scope of the processed personal data with the processing stated objectives; preventing the processing of personal data redundant in relation to the stated objectives of the processing;
- ensure accuracy, adequacy and relevance of personal data in relation to the processing of personal data targets;
- destruction or anonymization of personal data to achieve the goals of their treatment in case of loss or the need to achieve these goals, if you can not eliminate the admitted operator of personal data breaches, unless otherwise provided by federal law.

2.2 Terms and conditions of personal data processing

The operator performs the processing of personal data in the presence of at least one of the following conditions:

- personal data processing is done with the consent of the subject's personal data handling of personal data;
- personal data processing is necessary to achieve the objectives set by the international treaty of the Russian Federation or the law, to exercise and perform its Russian legislation on the operator's functions, powers and duties;
- personal data processing is necessary for the administration of justice, the execution of the judicial act, the act of another body or official to be executed in accordance with the law

Russian Federation of Enforcement;

- personal data processing is necessary for the performance of a contract to which any beneficiary or guarantor for that is the subject of personal data, as well as to conclude an agreement on the initiative of the personal data subject or an agreement by which the data subject will be the beneficiary or guarantor;
- personal data processing is necessary for the exercise of the rights and legitimate interests of the operator or third parties, or to achieve the objectives of public interest, provided that this does not violate the rights and freedoms of the personal data subject;
- processing of personal data is carried out, access to the general public who have been granted the personal data subject or, at his request (hereinafter - public personal

data); - made processing of personal data, to be published or mandatory disclosure in accordance with federal law.

2.3 Privacy of personal data

The operator and other persons who have access to personal data are obliged not to disclose to third parties or distribute personal data without the consent of the personal data subject, unless otherwise provided by federal law.

2.4 Public sources of personal data

In order to inform the Operator can create public sources of personal data subjects of personal data, including directories and address books. The public sources of personal data with the written consent of the subject of personal data can be included his name, first name, date and place of birth, position, contact telephone numbers, email address and other personal information to communicate the personal data subject.

Information on the subject of personal data should be at any time be excluded from publicly available sources of personal data at the request of the personal data subject, the authorized body for the protection of the rights of personal data subjects or by court decision.

2.5 Special categories of personal data

Operator Processing of special categories of personal data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, health, sexual life, is allowed in the following cases:

- the data subject has consented in writing to the processing of their personal data;
- personal data made public by the personal data subject;
- processing of personal data carried out in accordance with the legislation on the welfare state, labor legislation, Russian legislation on pensions for state pensions, on retirement pensions;

- personal data processing is necessary to protect the life, health or other vital interests of the subject of personal data or the life, health or other vital interests of other persons and obtaining the consent of the subject of personal data is not possible;

- processing of personal data carried out in medical and preventive purposes, to establish a medical diagnosis, the provision of health care and medical and social services, provided that the processing of personal data carried out by a person professionally engaged in medical activities and must, in accordance with Russian law to maintain medical confidentiality; personal data processing is necessary for the establishment or implementation of the rights of personal data subject or third parties, as well as in connection with the administration of justice;

- processing of personal data carried out in accordance with the law on compulsory types of insurance with the insurance legislation.

Processing of special categories of personal data carried out in the cases provided for in paragraph 4 of Article 10 of Law 152 shall be stopped immediately if the cause due to which their processing is carried out, unless otherwise provided by federal law.

Processing of personal data on convictions can be carried out solely by the Operator in the cases and in the manner determined in accordance with federal laws.

2.6 Biometric personal data

Information that characterize the physiological and biological characteristics of a person, on the basis of which it is possible to establish his identity - biometric personal data - can be processed by the Operator only with the consent of the personal data subject in writing.

2.7 The order processing of personal data to another person

The operator is entitled to charge the processing of personal data to another person with the consent of the personal data subject, unless otherwise provided by federal law, on the basis of the concluded contract with that person. The person performing the processing of personal data on behalf of the Operator shall be obliged to

observe the principles and rules for processing personal data provided by the Federal Law 152-and this Policy

2.8 Processing of personal data of citizens of the Russian Federation

In accordance with Article 2 of the Federal Law of July 21, 2014 N 242-FZ "On Amendments to Certain Legislative Acts of the Russian Federation to clarify the processing of personal data in the order information and telecommunications networks" in the collection of personal data, including through information and telecommunication network "Internet", the operator is obliged to provide the record, systematization, accumulation, storage, clarification (update, modification), extraction of personal data of citizens of the Russian Federation to use m database, in the territory of the Russian Federation, except:

- personal data processing is necessary to achieve the objectives set by the international treaty of the Russian Federation or the law, to exercise and perform its Russian legislation on the operator's functions, powers and duties;
- personal data processing is necessary for the administration of justice, the execution of the judicial act, the act of another body or official to be executed in accordance with the law

Russian Federation of Enforcement (hereinafter - the execution of the act); - processing of personal data necessary for the execution of powers of the federal executive bodies, bodies of state extra-budgetary funds, executive authorities of the Russian Federation, local authorities and functions of the organizations involved in the provision of relevant state and municipal services provided by the Federal Law of July 27, 2010 N 210-FZ "On the organization of public and municipal services", the Federal Law of July 27, 2010 N 210-FZ "On the organization of public and municipal services", the Federal Law of July 27, 2010 N 210-FZ "On the organization of public and municipal services", including the registration of the subject of personal data on a single portal of public and municipal services and (or) regional portals of state and municipal services;

- processing of personal data necessary to carry out professional activities of journalists and (or) the lawful activities of the media or scientific, literary or other creative activities, provided that this does not violate the rights and legitimate interests of the subject of personal data.

2.9 Cross-border transfer of personal data

The operator must ensure that foreign state, the territory of which it is supposed to carry out the transfer of personal data to ensure adequate protection of the rights of personal data subjects before the start of the transfer.

Cross-border transfer of personal data to foreign countries that do not provide adequate protection of the rights of subjects of personal data, can be carried out in the following cases:

- the consent in writing of the subject of personal data on the cross-border transfer of personal data;
- performance of the contract, a party which is the subject of personal data.

3. The rights of subjects of personal data

3.1 Consent of personal data subject to the processing of his personal data

the data subject will decide on his personal data and consent to their treatment freely their will and in their own interest. Consent to the processing of personal data can be given to the subject of personal data or his agent in any possible to confirm the fact of its receipt of the form, unless otherwise provided by federal law.

3.2 Rights of the subject of personal data

the data subject is entitled to receive from the Operator information relating to the processing of his personal data, if such a right is not limited in accordance with federal laws. the data subject has the right to require the operator to clarify their personal data, their blocking or destruction in case personal data are incomplete, outdated, inaccurate,

unlawfully obtained or are not necessary for the stated purpose of the processing, as well as take legal protection of their rights measures.

Processing of personal data for the purpose of promotion of the goods, works and services in the market by making direct contact with the subject of personal data (potential customer) by means of communication, as well as for purposes of political propaganda is permitted only with the prior consent of the subject of personal data.

The operator shall immediately stop at the request of the subject of personal data processing of his personal data for the above purposes.

Prohibited adoption based solely on automated processing of personal data solutions that give rise to legal effects in respect of the personal data subject or otherwise affect the rights and legitimate interests, except for cases stipulated by federal law, or with the consent in writing of the subject of personal data.

If the data subject considers that the operator carries out the processing of personal data in violation of the Federal Law # 152, or otherwise in violation of his rights and freedoms, the data subject shall have the right to appeal the action or the Operator's inaction authorized body for protection of the rights of personal data subjects or in the courts.

personal data subject has the right to protect their legitimate rights and interests, including for damages, and (or) non-pecuniary damage.

4. SECURITY OF PERSONAL DATA

security of personal data processed by the Operator, which ensures the implementation of legal, organizational and technical measures necessary to ensure that in the field of personal data protection requirements of the federal legislation.

To prevent unauthorized access to personal data by the Operator following organizational and technical measures are applied:

- appointment of officials responsible for organizing the handling and protection of personal data;
- restrictions to the number of persons admitted to the processing of personal data;
- familiarize the subjects with the federal laws and regulations of the Operator documents on processing and protection of personal data;

- organization of accounting, storage and handling of media containing information with personal data;
 - the definition of personal data security threats during their processing, forming the basis of threats to their models;

- development of model-based threats to personal data protection system;
- check availability and efficient use of means of information protection;
- differentiation of user access to information resources, software and hardware processing information;

- registration and accounting activities of information systems of personal data of users;
- the use of antiviral drugs and means of restoration of personal data protection; application where necessary means firewall, intrusion detection, analysis and security of the cryptographic protection of the information;

- organization of admission to the territory of the Operator, security of the premises with the technical means of processing personal data.

5. FINAL PROVISIONS

Other rights and obligations of the Operator in connection with the processing of personal data are determined by the legislation of the Russian Federation in the field of personal data.

Operator employees guilty of violating the rules governing the processing and protection of personal data, bear material, disciplinary, administrative, civil or criminal liability in accordance with the procedure established by federal laws.