

FAREXPO LLC PERSONAL DATA PROCESSING POLICY

1. GENERAL PROVISIONS

1.1. This Policy of FAREXPO LLC regarding the processing of Personal Data (hereinafter – the "Policy") has been developed in fulfillment of the requirements of Clause 2, Part 1, Article 18.1 of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" (hereinafter – the "Personal Data Law") in order to ensure the protection of the rights and freedoms of man and citizen in the processing of his Personal Data, including the protection of rights to privacy, personal and family secrecy.

1.2. The Policy applies to all Personal Data processed by FAREXPO LLC (hereinafter – the "Operator").

1.3. The Policy applies to relations in the field of Personal Data processing that arose with the Operator both before and after the approval of this Policy.

1.4. In fulfillment of the requirements of Part 2, Article 18.1 of the Personal Data Law, this Policy is published for free access on the information and telecommunications network Internet on the websites <https://ideumexpo.ru/en/> (hereinafter – the "Website") at the following link: https://www.en.farexpo.ru/PersonalDataProcessingPolicy_en.php

1.5. The Operator does not verify the accuracy of the Personal Data received from the Personal Data Subject.

1.6. The Operator ensures the protection of the processed Personal Data against unauthorized access and disclosure, unlawful use or loss in accordance with the requirements of the Personal Data Law.

1.7. The Personal Data Subject agrees to this Policy by granting consent to the processing of Personal Data.

2. TERMS AND ACCEPTED ABBREVIATIONS

For the purposes of application and interpretation of this Policy, the following basic terms are used (unless the Policy expressly provides otherwise). In the text of the Policy, these terms may be indicated with a capital or lowercase letter in the singular or plural, as well as in the form of abbreviations.

- **Personal Data** – any information relating directly or indirectly to a specific or identifiable natural person (Personal Data Subject);
- **Personal Data Operator** – FAREXPO LLC (TIN: 7841005070, OGRN: 1157847007460, legal address: 196105, St. Petersburg, Blagodatnaya St., 47, letter A, premises 13-N) is the owner of the Website and independently or jointly with other persons organizes and (or) carries out the processing of Personal Data, and also determines the purposes of Personal Data processing, the composition of Personal Data subject to processing, and the actions (operations) performed with Personal Data;

- **Subject, Personal Data Subject** – a natural person whose Personal Data is processed by the Operator or by a third party on behalf of the Operator;
- **Personal Data processing** – any action (operation) or set of actions (operations) with Personal Data performed with or without the use of automation tools. Personal Data processing includes, among other things:
 - collection;
 - recording;
 - systematization;
 - accumulation;
 - storage;
 - refinement (updating, modification);
 - extraction;
 - use;
 - transfer (provision to a limited circle of persons; access by a limited circle of persons);
 - dissemination;
 - depersonalization;
 - blocking;
 - deletion;
 - destruction.
- **Personal Data storage** – a process implying that Personal Data is held in a systematized form at the Operator's disposal.
- **Personal Data collection** – a purposeful process of obtaining Personal Data by the Operator directly from Personal Data Subjects.
- **Automated Personal Data processing** – processing of Personal Data using computer equipment;
- **Non-automated Personal Data processing** – processing of Personal Data contained in a Personal Data information system or extracted from such a system is considered to be carried out without the use of automation tools (non-automated) if such actions with Personal Data as use, refinement, dissemination, destruction of Personal Data in respect of each of the Personal Data Subjects are carried out with the direct participation of a person;
- **Mixed Personal Data processing** – processing by a person with the participation of computer equipment;
- **Provision of Personal Data** – actions aimed at disclosing Personal Data to a specific person or a specific circle of persons;
- **Blocking of Personal Data** – temporary suspension of Personal Data processing (except in cases where processing is necessary to refine Personal Data);
- **Destruction of Personal Data** – actions as a result of which it becomes impossible to restore the content of Personal Data in the Personal Data information system and (or) as a result of which material carriers of Personal Data are destroyed;
- **Depersonalization of Personal Data** – actions as a result of which it becomes impossible, without the use of additional information, to determine the belonging of Personal Data to a specific Personal Data Subject;
- **Personal Data information system** (hereinafter – the "PDIS") – a set of Personal Data contained in databases and information technologies and technical means ensuring their processing.

- **Cross-border transfer of Personal Data** – transfer of Personal Data to the territory of a foreign state to a public authority of a foreign state, a foreign natural person or a foreign legal entity.

3. CONDITIONS FOR PERSONAL DATA PROCESSING

3.1. The processing of the Subject's Personal Data by the Operator is carried out by methods with or without the use of automation tools for the periods necessary to achieve the purposes of processing. The condition for terminating the Operator's processing of the Subjects' Personal Data may be the achievement of the purposes of their processing, withdrawal of the Subject's consent to the processing of his Personal Data, withdrawal of consent to the dissemination of Personal Data, termination of the Operator's activities (reorganization or liquidation), closure of the Website, termination of the agreement between the Operator and the Subject, dismissal of the Operator's employee, or detection of the fact of their unlawful processing.

3.2. The Operator's policy regarding the processing of the Subjects' Personal Data is that Personal Data must be processed only in cases established by law, based on the main areas of the Operator's activities and taking into account the balance of interests of the Operator and the Subject. The Operator's processing of Personal Data is carried out taking into account the need to ensure the protection of the Subject's rights and freedoms, including protection of the right to privacy, personal and family secrecy, based on the following principles:

- the processing of Personal Data is carried out by the Operator on a lawful and fair basis;
- the processing of Personal Data is limited to the achievement of specific, predetermined and lawful purposes;
- processing of Personal Data incompatible with the purposes of collecting Personal Data is not allowed;
- only Personal Data that meets the purposes of its processing is subject to processing;
- the content and scope of the processed Personal Data correspond to the stated purposes of processing; excess of the processed Personal Data in relation to the stated purposes of its processing is not allowed;
- storage of Personal Data is carried out in a form that allows determining the Subject for no longer than the purposes of Personal Data processing require. The processed Personal Data is destroyed upon achievement of the purposes of processing or in case of loss of the need to achieve these purposes, unless otherwise provided by law.

3.3. The processing of Personal Data is carried out by the Operator in compliance with the principles and rules provided for by the Personal Data Law in the following cases:

- with the consent of the Personal Data Subject to the processing of his Personal Data;
- the processing of Personal Data is necessary for the performance of an agreement to which the Personal Data Subject is a party, or a beneficiary or guarantor under which;
- in cases where the processing of Personal Data is necessary for the Operator to exercise and perform the functions, powers and duties assigned by the legislation of the Russian Federation;
- the processing of Personal Data is necessary to protect the life, health or other vital interests of the Personal Data Subject, if obtaining the consent of the Personal Data Subject is impossible.

3.4. The Operator has no right to obtain and process the Subject's Personal Data containing information about race, nationality, political views, religious and philosophical beliefs, or health status, except with the written consent of the Subject.

3.5. The Operator does not process special categories of Personal Data or biometric data.

3.6. Subjects familiarize themselves with this Policy on the Website when granting consent.

3.7. Provision of the Subject's Personal Data at the request of state bodies (local self-government bodies) is carried out in the manner prescribed by the legislation of the Russian Federation.

3.8. Control over the fulfillment of the requirements of this Policy is exercised by an authorized person responsible for organizing the processing of Personal Data at the Operator.

3.9. The Operator's liability for violation of the requirements of the legislation of the Russian Federation in the field of Personal Data processing and protection is determined in accordance with the legislation of the Russian Federation.

3.10. Only employees of the Operator whose job duties include the processing of Personal Data are allowed to process Personal Data. The list of employees allowed to process Personal Data is established by the Operator.

3.11. Disclosure to third parties and dissemination of Personal Data without the consent of the Personal Data Subject is not allowed, unless otherwise provided by federal law. Consent to the processing of Personal Data authorized by the Personal Data Subject for dissemination is drawn up separately from other consents of the Personal Data Subject to the processing of his Personal Data.

3.12. Procedure for obtaining Personal Data:

3.12.1. The collection of Personal Data, except for publicly available Personal Data, is carried out by the Operator directly from the Personal Data Subjects, or from persons duly authorized to represent the interests of the Subjects; if the Subject's Personal Data can be obtained only from a third party, the Subject must be notified thereof or his written consent must be obtained.

3.12.2. When obtaining Personal Data, the Operator is obliged to inform the Personal Data Subject:

- about the purposes for which the Operator obtains the Personal Data;
- about the list of Personal Data requested by the Operator;
- about the list of actions that the Operator intends to perform with the Personal Data;
- about the period during which the consent of the Personal Data Subject to the processing of Personal Data is valid;
- about the procedure for withdrawing consent to the processing of Personal Data;
- about the consequences of the Personal Data Subject's refusal to grant the Operator consent to the receipt and processing of Personal Data.

3.12.3. Documents containing Personal Data are created by:

- copying originals of documents (passport of a citizen of the Russian Federation, document on education, TIN certificate, pension certificate, SNILS, etc.);

- entering information into accounting forms;
- obtaining originals of the necessary documents (passport of a citizen of the Russian Federation, income statement, employment record book, medical report, reference letter, etc.).

3.12.4. Personal Data processing for each purpose of processing specified in clauses 5.3–5.6 of the Policy is carried out by:

- Receiving Personal Data in oral, written and electronic form directly from the Subjects;
- Entering Personal Data into the Operator's journals, registers and information systems;
- Using other methods of Personal Data processing depending on the action on Personal Data processing.

4. RIGHTS AND OBLIGATIONS

4.1. Obligations of the Operator:

1. Organize the processing of Personal Data in accordance with the requirements of the Personal Data Law;
2. Respond to applications and requests of Personal Data Subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
3. Notify the authorized body for the protection of the rights of Personal Data Subjects (the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor)), at the request of that body, of the necessary information within 10 working days from the date of receipt of such request. This period may be extended, but not by more than five working days. To do so, the Operator must send Roskomnadzor a reasoned notification indicating the reasons for extending the period for providing the requested information;
4. In the manner determined by the federal executive body authorized in the field of security, ensure interaction with the state system for detecting, preventing and eliminating the consequences of computer attacks on the information resources of the Russian Federation, including informing it about computer incidents that resulted in the unlawful transfer (provision, dissemination, access) of Personal Data.
5. In cases where Personal Data was obtained not from the Personal Data Subject, notify the Personal Data Subject of the fact that the Operator has obtained the Personal Data.
6. In case of refusal to provide Personal Data, explain to the Personal Data Subject the consequences of such refusal.
7. Publish or otherwise ensure unrestricted access to a document defining the Operator's policy regarding the processing of Personal Data.
8. Take the necessary legal, organizational and technical measures or ensure that they are taken to protect Personal Data from unlawful or accidental access to it, destruction, modification, blocking, copying, provision, dissemination of Personal Data, as well as from other unlawful actions in respect of Personal Data.

4.2. The Operator has the right to:

1. Independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations provided for by the Personal Data Law and

- regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law or other Federal Laws;
2. Entrust the processing of Personal Data to another person. The person processing Personal Data on behalf of the Operator is obliged to comply with the principles and rules of Personal Data processing provided for by the Personal Data Law.
 3. In case of withdrawal by the Subject of consent to the processing of Personal Data, the Operator has the right to continue processing Personal Data without the Subject's consent if there are grounds specified in the Personal Data Law.

4.3. The Subject has the right to:

1. Receive information relating to the processing of his Personal Data, except in cases provided for by federal laws. The information is provided to the Personal Data Subject by the Operator in an accessible form, and it must not contain Personal Data relating to other Personal Data Subjects, except in cases where there are lawful grounds for disclosing such Personal Data. The list of information and the procedure for obtaining it are established by the Personal Data Law. The information may contain:
 - Confirmation of the fact of Personal Data processing by the operator;
 - Legal grounds and purposes of Personal Data processing;
 - Purposes and methods of Personal Data processing applied by the operator;
 - Name and location of the operator, information about persons (except employees of the operator) who have access to Personal Data or to whom Personal Data may be disclosed on the basis of an agreement with the operator or on the basis of federal law;
 - Processed Personal Data relating to the relevant Personal Data Subject, the source of its receipt, unless a different procedure for providing such data is provided by federal law;
 - Terms of Personal Data processing, including terms of their storage;
 - Procedure for the Personal Data Subject to exercise the rights provided for by this Federal Law;
 - Information about the cross-border transfer of data that has been carried out or is intended;
 - Name or surname, first name, patronymic and address of the person processing Personal Data on behalf of the operator, if the processing is or will be entrusted to such a person;
 - Other information provided for by the Personal Data Law or other federal laws.
2. Give preliminary consent to the processing of Personal Data for the purposes of promoting goods, works and services on the market;
3. Demand from the operator the refinement of his Personal Data, its blocking or destruction if the Personal Data is incomplete, outdated, inaccurate, unlawfully obtained or is not necessary for the stated purpose of processing, as well as take the measures provided for by law to protect his rights.
4. Appeal to Roskomnadzor or to a court against the unlawful actions or inaction of the Operator in processing his Personal Data.

5. PURPOSES OF PERSONAL DATA PROCESSING, CATEGORIES OF SUBJECTS, CATEGORIES OF

PROCESSED PERSONAL DATA AND METHODS OF THEIR PROCESSING

5.1. Personal Data processing is limited to the achievement of specific, predetermined and lawful purposes. Processing of Personal Data incompatible with the purposes of collecting Personal Data is not allowed.

5.2. Only Personal Data that meets the purposes of its processing is subject to processing.

5.3. Purpose of Personal Data processing: Preparation, conclusion and performance of a civil law agreement on the participation of visitors in exhibitions and events.

Categories of processed Personal Data:

- surname, first name, patronymic;
- position;
- email address;
- telephone number;
- country of residence.

Categories of Subjects: visitors of the Website, visitors of exhibitions (events).

Legal grounds for Personal Data processing:

- processing of Personal Data is carried out with the Subject's consent to the processing of his Personal Data;
- processing of Personal Data is necessary for the performance of an agreement to which the Subject is a party or a beneficiary or guarantor under which, as well as for concluding an agreement at the initiative of the Subject or an agreement under which the Subject will be a beneficiary or guarantor. The agreement concluded with the Subject may not contain provisions restricting the rights and freedoms of the Subject.

List of actions for Personal Data processing:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- refinement (updating, modification);
- extraction;
- use;
- depersonalization;
- blocking;
- deletion;
- destruction;
- transfer.

Methods of processing: mixed; with transfer over the internal network of the legal entity; with transfer over the Internet.

Term of Personal Data processing and storage:

- Term of the agreement;
- The condition for terminating the processing of Personal Data may be the achievement of the purposes of their processing, withdrawal of consent to the processing of Personal Data, termination of the Operator's activities (reorganization or liquidation), detection of the fact of their unlawful processing, or expiration of the processing periods.

5.4. Purpose of Personal Data processing: Sending information and advertising messages (subject to the provision of separate consent to receive information and/or advertising messages).**Categories of processed Personal Data:**

- surname, first name, patronymic;
- year of birth; month of birth;
- date of birth;
- gender;
- email address;
- telephone number;
- profession;
- position.

Categories of Subjects: visitors of the Website, visitors of exhibitions (events).

Legal grounds for Personal Data processing:

- processing of Personal Data is carried out with the Subject's consent to the processing of his Personal Data and consent to receive advertising and information messages.

List of actions for Personal Data processing:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- refinement (updating, modification);
- extraction;
- use;
- depersonalization;
- blocking;
- deletion;
- destruction;
- transfer (provision, access).

Methods of processing: automated; with transfer over the internal network of the legal entity; with transfer over the Internet.

Term of Personal Data processing and storage:

- Term of validity of the consent to the processing of Personal Data;
- Term of validity of the consent to receive advertising and information mailings;

- The condition for terminating the processing of Personal Data may be the achievement of the purposes of their processing, withdrawal of consent to the processing of Personal Data, termination of the Operator's activities (reorganization or liquidation), detection of the fact of their unlawful processing, or expiration of the processing periods.

5.5. Purpose of Personal Data processing: Use of information collected through the "Yandex.Metrica" measurement program.

Categories of processed Personal Data:

- Information collected through measurement programs.

Categories of Subjects: visitors of the Website.

Legal grounds for Personal Data processing:

- processing of Personal Data is carried out with the Subject's consent to the processing of his Personal Data.

List of actions for Personal Data processing:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- refinement (updating, modification);
- extraction;
- use;
- transfer (provision to a limited circle of persons; access by a limited circle of persons);
- depersonalization;
- blocking;
- deletion;
- destruction.

Methods of processing: automated; with transfer over the internal network of the legal entity; with transfer over the Internet.

Term (and conditions of termination) of Personal Data processing and storage:

- Term of validity of the consent to the processing of Personal Data.
- The condition for terminating the processing of Personal Data may be the achievement of the purposes of their processing, withdrawal of consent to the processing of Personal Data, termination of the Operator's activities (reorganization or liquidation), termination of the Website's operation, detection of the fact of their unlawful processing, or expiration of the processing periods.

5.6. Purpose of Personal Data processing: Publication of opinions of visitors of exhibitions (events) on the Website.

Categories of Personal Data authorized by the Subject for dissemination:

- surname, first name;

- photograph;
- position.

Categories of Subjects: visitors of exhibitions (events).

Legal grounds for Personal Data processing:

- processing of Personal Data is carried out with the consent of the Personal Data Subject to the processing of his Personal Data and consent to the dissemination of Personal Data.

List of actions for Personal Data processing:

- dissemination.

Methods of processing: automated; with transfer over the internal network of the legal entity; with transfer over the Internet.

Term (and conditions of termination) of Personal Data processing and storage:

- Term of validity of the consent;
- Term of validity of the consent to dissemination;
- The condition for terminating the processing of Personal Data may be the achievement of the purposes of their processing, withdrawal of consent to the processing of Personal Data or consent to the dissemination of Personal Data, termination of the Operator's activities (reorganization or liquidation), termination of the operation of the Website administered by the Operator, termination of the agreement, dismissal of the employee, detection of the fact of their unlawful processing, or expiration of the processing periods.

6. MEASUREMENT PROGRAM DATA AND TECHNICAL DATA

6.1. On the Website administered by the Operator, the "Yandex.Metrica" measurement program is used for statistics. The information processed through measurement programs includes:

- information about the software and hardware devices used by Website visitors, including the model and version of the operating system, unique identifiers of the devices from which the Website is visited;
- information recorded in server logs, in particular, information about cookies, IP address, and system failures;
- information about the visitor's location (country, region);
- visited pages/sections;
- number of page visits;
- information about movement through the pages/sections of the Website;
- session duration;
- entry points (third-party websites from which the visitor follows a link to the Website);
- exit points (links to the Website by which the visitor goes to third-party websites);
- the Website visitor's provider;
- the Website visitor's browser data.

6.2. The "Cookie" technology is used in the Service.

The processed information collected through cookie files includes:

- identification number;
- date and time of visit;
- viewed pages;
- visitor's region;
- type of device from which the visit was made and its operating system.

6.3. The Operator also processes technical information. Technical information means information that is automatically transmitted to the Operator in the course of using the Service, namely:

- IP address;
- Internet browser;
- other information of a technical nature that is not personal data.

7. TRANSFER OF PERSONAL DATA

7.1. The Operator transfers Personal Data to third parties in the following cases:

- consent to such actions has been obtained from the Personal Data Subject;
- the transfer is provided for by Russian or other applicable legislation within the framework of the procedure established by legislation.

7.2. The list of persons to whom Personal Data is transferred is established by the consent to the processing of Personal Data granted by the Personal Data Subject, or by the mandatory norms of applicable legislation.

7.3. Provision of the Subject's Personal Data at the request of state bodies (local self-government bodies) is carried out in the manner prescribed by the legislation of the Russian Federation.

7.4. When collecting Personal Data, including through the information and telecommunications network Internet, the Operator ensures the processing of Personal Data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except in cases specified in the Personal Data Law.

7.5. The Operator does not independently carry out cross-border transfer of Personal Data.

8. UPDATING, CORRECTION, DELETION, DESTRUCTION OF PERSONAL DATA, RESPONSES TO SUBJECTS' REQUESTS FOR ACCESS TO PERSONAL DATA

8.1. Procedure for considering Subjects' requests:

8.1.1. Confirmation of the fact of Personal Data processing by the Operator, the legal grounds and purposes of Personal Data processing, as well as other information specified in Part 7 of Article 14 of the Personal Data Law, are provided by the Operator to the Subject or his representative within 10 working days from the moment of application or receipt of the request of the Personal Data Subject or his representative. This period may be extended, but not by more than five working days. To do so, the Operator must send the Subject a

reasoned notification indicating the reasons for extending the period for providing the requested information.

8.1.2. The information provided does not include Personal Data relating to other Subjects, except in cases where there are lawful grounds for disclosing such Personal Data.

8.1.3. The request must contain data allowing the Subject to be identified, and the Subject's signature, and, if the request is signed by the Subject's representative, a document confirming his authority.

8.1.4. The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

8.1.5. The Operator provides the information specified in Part 7 of Article 14 of Personal Data Law to the Subject or his representative in the form in which the relevant application or request was sent, unless otherwise indicated in the application or request. If the application (request) of the Subject does not reflect, in accordance with the requirements of the Personal Data Law, all necessary information or the Subject does not have access rights to the requested information, he is sent a reasoned refusal.

8.2. The Subject's right to access his Personal Data may be restricted in accordance with Part 8 of Article 14 of the Personal Data Law, including if the Subject's access to his Personal Data violates the rights and legitimate interests of third parties.

8.3. In case of detection of inaccurate Personal Data upon the application of the Subject or his representative, or at their request or at the request of Roskomnadzor, the Operator blocks the Personal Data relating to this Subject from the moment of such application or receipt of the said request for the period of verification, if blocking the Personal Data does not violate the rights and legitimate interests of the Subject.

8.4. In case of confirmation of the fact of inaccuracy of Personal Data, the Operator, on the basis of information provided by the Subject or his representative or by Roskomnadzor, or other necessary documents, refines the Personal Data within seven working days from the day such information is provided and removes the blocking of the Personal Data.

8.5. In case of detection of unlawful processing of Personal Data upon the application (request) of the Subject or his representative or Roskomnadzor, the Operator blocks the unlawfully processed Personal Data relating to this Personal Data Subject within three working days from the moment of such application or receipt of the request.

8.6. If the Operator, Roskomnadzor or another interested person detects the fact of unlawful or accidental transfer (provision, dissemination) of Personal Data (access to Personal Data) that entailed a violation of the Subject's rights, the Operator:

- within 24 hours – notifies Roskomnadzor of the incident, the presumed causes that led to the violation of the Subjects' rights, the presumed harm caused to the Subjects' rights, and the measures taken to eliminate the consequences of the incident, and also provides information about the person authorized by the Operator to interact with Roskomnadzor on issues related to the incident;
- within 72 hours – notifies Roskomnadzor of the results of the internal investigation of the detected incident and provides information about the persons whose actions caused it (if any).

8.7. Destruction of Personal Data:

8.7.1. Upon achievement of the purpose of Personal Data processing, as well as in case of withdrawal by the Personal Data Subject of consent to their processing, Personal Data is subject to destruction if:

- otherwise is not provided for by an agreement to which the Subject is a party, a beneficiary or a guarantor;
- the Operator is not entitled to process without the consent of the Personal Data Subject on the grounds provided for by the Personal Data Law or other federal laws;
- otherwise is not provided for by the legislation of the Russian Federation.

8.7.2. Personal Data on electronic media is destroyed by erasing it from computer memory or formatting computer memory.

8.7.3. Destruction of documents (paper media) containing Personal Data is carried out by burning, crushing (shredding), chemical decomposition, turning into a shapeless mass or powder. A shredder may be used to destroy paper documents.

8.7.4. Destruction of Personal Data is carried out by a commission created by order of the Operator's General Director.

8.7.5. The period for destruction of Personal Data is 10 working days from the moment of occurrence of one of the events provided for in clause 8.6 of this Policy.

9. MEASURES TAKEN BY THE OPERATOR TO PROTECT PERSONAL DATA

9.1. In accordance with the requirements of regulatory documents, the Operator has created a Personal Data protection system consisting of legal, organizational and technical protection subsystems.

9.2. The legal protection subsystem is a set of legal, organizational, administrative and regulatory documents ensuring the creation, functioning and improvement of Personal Data protection systems.

9.3. The organizational protection subsystem includes the organization of the management structure of the Personal Data protection system, the authorization system, and the protection of information when working with employees, partners and third parties.

9.4. The technical protection subsystem includes a set of technical, software and hardware-software tools ensuring the protection of Personal Data.

9.5. The main Personal Data protection measures used by the Operator are:

1. Appointment of a person responsible for Personal Data processing, who organizes Personal Data processing, training and instruction, and internal control over the Operator's and its employees' compliance with Personal Data protection requirements.
2. Identification of current threats to the security of Personal Data during its processing in Personal Data information systems and development of measures and actions to protect Personal Data.
3. Development of this Policy.

4. Establishment of rules for access to Personal Data processed in Personal Data information systems, as well as ensuring registration and accounting of all actions performed with Personal Data in Personal Data information systems.
5. Establishment of individual access passwords for employees to the information system in accordance with their production duties.
6. Application of information protection tools that have passed conformity assessment procedures in the prescribed manner.
7. Application of certified antivirus software with regularly updated databases.
8. Compliance with conditions ensuring the safety of Personal Data and excluding unauthorized access to it.
9. Detection of facts of unauthorized access to Personal Data and taking measures.
10. Restoration of Personal Data modified or destroyed as a result of unauthorized access to it.
11. Instruction of the Operator's employees directly involved in Personal Data processing on the provisions of the legislation of the Russian Federation on Personal Data, including requirements for Personal Data protection, documents defining the Operator's policy regarding Personal Data processing, and local acts on Personal Data processing.
12. Implementation of internal control and audit.

9.6. Employees holding positions that provide for the processing of Personal Data are admitted to it after signing an obligation on non-disclosure.

9.7. The job descriptions of the Operator's employees processing Personal Data include, in particular, provisions on the need to report any cases of unauthorized access to Personal Data.

9.8. When processing Personal Data, the Operator ensures:

- implementation of measures aimed at preventing unauthorized access to Personal Data and/or its transfer to persons not entitled to access such information;
- timely detection of facts of unauthorized access to Personal Data;
- prevention of impact on the technical means of automated Personal Data processing that could disrupt their functioning;
- the possibility of immediate restoration of Personal Data modified or destroyed as a result of unauthorized access to it;
- constant control over ensuring the level of Personal Data protection.

9.9. The Operator conducts internal investigations in the following situations:

- in case of unlawful or accidental transfer (provision, dissemination, access) of Personal Data that entailed a violation of the rights of Personal Data Subjects;
- in other cases provided for by legislation in the field of Personal Data.

9.10. The employee responsible for organizing the processing of Personal Data exercises internal control over the compliance by employees authorized to process Personal Data with the requirements of legislation in the field of Personal Data and local regulatory acts, and over the compliance of these acts with the requirements of legislation in the field of Personal Data.

9.11. Internal scheduled inspections are carried out on the basis of an annual plan approved by the Operator's General Director.

9.12. Internal unscheduled inspections are carried out by decision of the employee responsible for organizing the processing of Personal Data. The basis for them is information about a violation of legislation in the field of Personal Data received orally or in writing.

9.13. Based on the results of the internal inspection, a report is drawn up addressed to the Operator's General Director. If violations are detected, the document provides a list of measures to eliminate them within the relevant timeframes.

9.14. The Operator uses technical means and software equipment for the processing and protection of Personal Data.

9.15. The above technical means and software equipment for the processing and protection of Personal Data are located in the office and premises of the Operator or in the premises of other persons engaged by the Operator.

9.16. All persons allowed to work with Personal Data, as well as those involved in the operation and technical maintenance of the PDIS, have familiarized themselves with this Policy.

9.17. The Operator has organized a training process on the use of protection tools operated by the Operator. Training in this area has been completed by persons with permanent access to Personal Data, persons operating the technical and software tools of the PDIS and the PDIS protection tools, and persons responsible for the operation of the PDIS information protection tools.

9.18. Employees are obliged to immediately inform the relevant official of the Operator about the loss or shortage of information carriers constituting Personal Data, as well as about the causes and conditions of a possible leak of Personal Data. In case of an attempt by unauthorized persons to obtain from an employee the Personal Data processed by the Operator, immediately notify the relevant official of the Operator.

9.19. When working with the software tools of the Operator's automated system implementing the functions of viewing and editing Personal Data, it is prohibited to demonstrate screen forms containing such data to persons who do not have the appropriate authorization.

9.20. Storage of Personal Data:

9.20.1. Personal Data of Subjects may be obtained, further processed and transferred for storage both on paper and in electronic form.

9.20.2. Personal Data on paper media is stored by the Operator for the periods of storage of documents for which such periods are provided by the legislation on archiving in the Russian Federation (Federal Law No. 125-FZ of 22.10.2004 "On Archiving in the Russian Federation", the List of standard administrative archival documents generated in the course of the activities of state bodies, local self-government bodies and organizations, indicating their storage periods (approved by Order of the Federal Archival Agency No. 236 of 20.12.2019)).

9.20.3. Personal Data of Subjects recorded on paper media is stored in lockable cabinets or in lockable premises with restricted access rights.

9.20.4. Personal Data of Subjects processed using automation tools is processed and stored in compliance with the requirements established by Decree of the Government of the Russian Federation No. 1119 "On approval of requirements for the protection of Personal Data during their processing in Personal Data information systems" dated 01.11.2012. The storage period of Personal Data processed in Personal Data information systems corresponds to the storage period of Personal Data on paper media.

9.20.5. Storage and placement of documents containing Personal Data in open electronic catalogs (file-sharing services) in Personal Data information systems is not allowed.

9.20.6. Storage of Personal Data must be carried out in a form that allows determining the Subject for no longer than the purposes of Personal Data processing require, unless the storage period of Personal Data is established by federal law or by an agreement to which the Subject is a party, a beneficiary or a guarantor.

10. LIABILITY OF THE OPERATOR

10.1. The management of the Operator is responsible for the failure to ensure the confidentiality of Personal Data and non-compliance with the rights and freedoms of Subjects with regard to their Personal Data, including the rights to privacy, personal and family secrecy.

10.2. The Operator's employees bear personal responsibility for non-compliance with the requirements for the processing and security of Personal Data in accordance with the legislation of the Russian Federation.

10.3. An employee of the Operator may be held liable in the following cases:

- Intentional or negligent disclosure of Personal Data;
- Loss of material carriers of Personal Data;
- Violation of the requirements of this Policy and other regulatory documents of the Operator regarding access to and work with Personal Data.

10.4. In cases of violation of the established procedure for processing and ensuring the security of Personal Data, unauthorized access to Personal Data, disclosure of Personal Data and causing material or other damage to the Operator, its employees, counterparties and other Subjects, the guilty persons bear civil, criminal, administrative, disciplinary and other liability provided for by the legislation of the Russian Federation.

10.5. The Operator informs the Subject that this Policy applies only to Personal Data processed by the Operator. The Operator does not control and is not responsible for the use of third-party websites to which the Subject may, at his own discretion and at his own risk, follow the links posted on the Websites.

10.6. The Operator is not responsible for the accuracy of the Subject's Personal Data.

11. FINAL PROVISIONS

11.1. This Policy comes into force from the moment of approval, is put into effect by order of the Operator and is valid indefinitely (until cancelled or replaced by a new version of the Policy).

11.2. The requirements of this Policy apply to all employees of the Operator who have access to Personal Data, as well as to all Subjects.

11.3. The Operator has the right to unilaterally make changes and (or) additions to this Policy. In case of changes affecting the rights of Subjects, the Operator has the right, but is not obliged, to send information about these changes to the Subjects at their contact details or notify them of the changes in another way.

12. DETAILS OF THE OPERATOR

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