

APPROVED
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PRIVACY POLICY

1. General provisions

1.1. The Regulation on the processing of personal data (hereinafter referred to as the "Regulations") has been issued and is being applied by The Special Systems and Technologies Group of Companies – SST Group (hereinafter the "Operator") in accordance with Section 2, Part 1, Art. 18.1 Federal Law of July 27, 2006 N 152-FZ "On Personal Data."

This Regulation determines the policies, procedures and conditions of the Operator with regard to the processing of personal data, establishes procedures aimed at preventing and detecting violations of the legislation of the Russian Federation, and eliminating the consequences of such violations related to the processing of personal data.

All issues related to the processing of personal data not regulated by this Regulation shall be resolved in accordance with the current legislation of the Russian Federation in the field of personal data.

1.2. The purpose of processing personal data is:

- ensuring the protection of human and civil rights and freedoms while processing his personal data, including protection of privacy rights, personal and family secrets;
- promotion of the goods, works, services of the Operator in the market by making direct contacts with the potential consumer by means of communication options.
- 1.3. The validity of this Regulation does not apply to relations arising when:
 - organization of storage, acquisition, registration and use of documents containing the personal data of the Archive Fund of the Russian Federation and other archival funds;
 - processing of personal data classified in accordance with the established procedure for information constituting a state secret;
 - the provision by the authorized bodies of information on the activities of the courts in the Russian Federation in accordance with Federal Law No 262-FZ dated 22.12.2008 "On providing access to information on the activities of courts in the Russian Federation".

2. The main terms and definitions used in the local regulatory acts of SST Group, which regulate the processing of personal data:

Personal data – any information related to a directly or indirectly defined or determined individual (subject of personal data).

Information – information (messages, data), regardless of the form of their presentation.

Operator – a state body, a municipal body, a legal entity or an individual, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as defining the purposes of processing personal data, the composition of personal data subject to processing, the actions (operations) performed with personal data.

Personal data processing – any action (operation) or a set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, updating (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

Automated processing of personal data – processing of personal data by means of computer facilities.

Provision of personal data – actions aimed at disclosing personal data to a specific person or a certain circle of persons.

Dissemination of personal data – actions aimed at disclosing personal data to an undefined circle of persons.

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

Blocking of personal data – temporary termination of processing of personal data (except for cases when processing is necessary for specification of personal data).

Destruction of personal data – an action that makes it impossible to restore the contents of personal data in the personal data information system and (or) as a result of which material data carriers of personal data are destroyed.

Depersonalization of personal data – an action that makes it impossible to use the additional information to determine whether personal data belongs to a particular personal data subject.

Info system – a set of personal data contained in databases, software and technical means providing information processing.

3. Processing is organized by the Operator on the principles:

- the legitimacy of the purposes and methods of processing personal data, integrity and fairness in the activities of the Operator;
- reliability of personal data, its sufficiency for processing purposes, inadmissibility of processing personal data that is redundant in relation to the purposes claimed in the collection of personal data;
- processing only personal data that meet the purposes of their processing;
- compliance of content and volume of processed personal data with the stated processing objectives. The processed personal data should not be redundant in relation to the stated purposes of their processing;
- inadmissibility of combining databases containing personal data, processing of which is carried out for purposes that are not compatible with each other;
- ensuring the accuracy of personal data, their sufficiency, and in necessary cases and relevance in relation to the purposes of processing personal data. The operator takes the necessary measures or ensures their acceptance for the removal or refinement of

incomplete or inaccurate data;

- storage of personal data in a form that allows you to determine the subject of personal data, no longer just the purpose of processing personal data.
- processing of personal data is carried out in compliance with the principles and rules provided for by Federal Law No 152-FZ dated 27.07.2006 "On Personal Data" and this Regulation.

4. Personal data is processed by SST Group in order to:

- ensure compliance with the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation, local regulatory acts of SST Group;
- the exercise of the functions, powers and duties imposed by the legislation of the Russian Federation on SST Group, including the provision of personal data to public authorities, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Compulsory Medical Insurance Fund, As well as to other state bodies;
- regulation of labor relations with the employees of SST Group (assistance in employment, training and promotion, personal security, monitoring the quantity and quality of the work performed, ensuring the safety of property);
- provision of additional guarantees and compensations to employees of SST Group and their family members, including non-state pension provision, voluntary medical insurance, medical services and other types of social security;
- protection of life, health or other vital interests of subjects of personal data;
- preparation, conclusion, execution and termination of contracts with counter-parties;
- provision of access and intra-site facilities at the facilities of SST Group;
- formation of reference materials for internal information support for the activities of SST Group, its branches and representative offices, as well as subsidiaries and organizations of SST Group;
- execution of judicial acts, acts of other bodies or officials subject to enforcement in accordance with the legislation of the Russian Federation on enforcement proceedings;
- the exercise of the rights and legitimate interests of SST Group in the framework of carrying out activities specified in the Charter and other local regulatory acts of SST Group, or third parties or achieving socially significant goals;
- for other legitimate purposes.

5. The list of subjects whose personal data are processed in SST Group

5.1. In SST Group, personal data of the following categories of subjects are processed:

- employees of structural divisions of the administration of SST Group, its branches and representative offices;
- employees of subsidiaries and organizations of SST Group;

- other subjects of personal data (to ensure the implementation of the processing objectives specified in section 4 of the Policy).

6. The list of personal data processed by SST Group

6.1. The list of personal data processed by SST Group is determined in accordance with the laws of the Russian Federation and local regulations of SST Group, taking into account the purposes of processing personal data specified in section 4 of the Policy.

6.2. Special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, intimate life are not processed in SST Group.

7. Functions of SST Group in the processing of personal data

7.1. SST Group in the processing of personal data:

- takes measures necessary and sufficient to ensure compliance with the requirements of the legislation of the Russian Federation and local statutory acts of SST Group in the field of personal data;
- takes legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as other illegal actions in respect of personal data;
- appoints the person responsible for organizing the processing of personal data in SST Group;
- publishes local normative acts defining the policy and issues of processing and protection of personal data in SST Group;
- acquaints employees of SST Group, its branches and representative offices directly processing personal data, with the provisions of the legislation of the Russian Federation and local statutory acts of SST Group in the field of personal data, including requirements for the protection of personal data, and training of these workers;
- publishes or otherwise provides unrestricted access to the Policy;
- informs the owners of the personal data or their representatives about the availability of their personal data in accordance with the established procedure, provides an opportunity to get acquainted with these personal data when applying and / or receiving requests from specified subjects of personal data or their representatives, unless otherwise provided by law Russian Federation;
- terminates processing and destroys personal data in cases stipulated by the legislation of the Russian Federation in the field of personal data;
- performs other actions stipulated by the legislation of the Russian Federation in the field of personal data.

8. Conditions for processing personal data in SST Group

8.1. Processing of personal data in SST Group is carried out with the consent of the subject of personal data to the processing of his personal data, unless otherwise provided by the legislation of the Russian Federation in the field of personal data.

8.2. SST Group does not disclose to third parties without the consent of the personal data subject and does not disseminate personal data unless otherwise provided by federal law.

8.3. SST Group has the right to entrust processing of personal data to another person with the consent of the subject of personal data on the basis of a contract concluded with that person. The contract must contain a list of actions (operations) with personal data that will be performed by the person processing personal data, the purpose of processing, the duty of such person to maintain the confidentiality of personal data and ensure the safety of personal data during processing, as well as the requirements for protecting the processed personal data in Accordance with Article 19 of the Federal Law "On Personal Data".

8.4. For the purposes of internal information support, SST Group can create internal reference materials, where the surname, first name, patronymic, place of work, position, year and place of birth can be included with the written consent of the personal data subject, unless otherwise provided by the legislation of the Russian Federation , Address, subscriber number, e-mail address, other personal data reported by the subject of personal data.

8.5. Access to the personal data processed by SST Group is allowed only to employees of SST Group, occupying the positions included in the list of posts of the structural divisions of the administration of SST Group, its branches and representative offices, whose processing involves the processing of personal data.

9. List of actions with personal data and ways of processing them

9.1. SST Group collects, records, systemizes, accumulates, stores, updates (updates, changes), extracts, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes and destroys personal data.

9.2. Processing of personal data in SST Group is carried out in the following ways:

- manual processing of personal data;
- automated processing of personal data with the transfer of information received through information and telecommunications networks or without it;
- mixed processing of personal data.

10. Rights of subjects of personal data

10.1. Subjects of personal data are entitled to:

- full information about their personal data processed by SST Group;
- access to their personal data, including the right to receive a copy of any record containing their personal data, except as provided for by federal law, and to access medical data related to them with the help of a medical specialist of their choice;
- clarification of their personal data, their blocking or destruction in the event that personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing;
- withdrawal of consent to the processing of personal data;
- the adoption of measures provided by law to protect their rights;
- appealing against the action or inaction of SST Group, carried out in violation of the requirements of the legislation of the Russian Federation in the field of personal data,

to the authorized body for the protection of the rights of subjects of personal data or to a court;

- the exercise of other rights provided for by the legislation of the Russian Federation.

11. Measures taken by SST Group to ensure the fulfillment of the duties of the operator when processing personal data

11.1. Measures that are necessary and sufficient to ensure the performance of SST Group of the operator's duties, provided for by the legislation of the Russian Federation in the field of personal data, include:

- Appointment of the person responsible for organizing the processing of personal data in SST Group;
- adoption of local regulations and other documents in the field of processing and protection of personal data;
- organization of training and conducting methodical work with employees of the structural divisions of the administration of SST Group, its branches and representative offices occupying the positions included in the list of posts of the structural divisions of the administration of SST Group, its branches and representative offices, whose processing involves the processing of personal data;
- obtaining consent of subjects of personal data for the processing of their personal data, except for cases provided for by the legislation of the Russian Federation;
- Separation of personal data processed without the use of automation tools, from other information, in particular by fixing them on separate material carriers of personal data, in special sections;
- provision of separate storage of personal data and their material carriers, processing of which is carried out for different purposes and which contain different categories of personal data;
- prohibiting the transfer of personal data through open communication channels, computer networks outside the controlled area, SST Group and Internet networks without the use of measures established by SST Group to ensure the security of personal data (except for public and (or) depersonalized personal Data);
- storage of material carriers of personal data in compliance with the conditions ensuring the safety of personal data and excluding unauthorized access to them;
- implementation of internal control over the compliance of personal data processing with the Federal Law "On Personal Data" and regulatory legal acts adopted in accordance with it, requirements for the protection of personal data, this Policy, local regulatory acts of SST Group;
- other measures provided for by the legislation of the Russian Federation in the field of personal data.

11.2. Measures to ensure the safety of personal data when processing them in personal data information systems are established in accordance with local regulatory acts of SST Group, which regulate the security of personal data when processing them in the personal data information systems of SST Group.

12. Control over compliance with the legislation of the Russian Federation and local regulatory acts of SST Group in the field of personal data, including requirements for the protection of personal data

12.1. Control over compliance of the legislation of the Russian Federation and local statutory acts of SST Group in the field of personal data, including requirements for the personal data protection, by the divisions of SST Group, its branches and representative offices is aimed to verify the compliance of personal data processing in the divisions of SST Group, its branches and representative offices to the legislation of the Russian Federation and local regulatory acts of SST Group referring to personal data, including the requirements for the protection of personal data, as well as the measures taken to prevent and detect violations of the legislation of the Russian Federation in the field of personal data, identify possible channels of diversion and unauthorized access to personal data, and to eliminate the consequences of such violations.

12.2. Internal control over the observance by the structural divisions of the administration of SST Group, its branches and representative offices of the legislation of the Russian Federation and local statutory acts of SST Group in the field of personal data, including requirements for the protection of personal data, is carried out by the person responsible for organizing the processing of personal data in SST Group.

12.3. Internal control over the compliance of personal data processing The Federal Law "On Personal Data" and the regulatory legal acts, the requirements for the protection of personal data, this Policy, local regulations of SST Group are implemented by the Department for the Protection of Business of SST Group.

12.4. Personal responsibility for compliance with the requirements of the legislation of the Russian Federation and local statutory acts of SST Group in the field of personal data in the structural division of the administration of SST Group, its branch and representative office, as well as for ensuring the confidentiality and safety of personal data in these divisions of SST Group is assigned to their leaders.