

**POLICY OF THE COMPANY
REGARDING TO THE PERSONAL DATA
PROCESSING**

CONTENTS:

1. GENERAL PROVISIONS	3
2. PRINCIPLES AND CONDITIONS OF PERSONAL DATA PROCESSING	4
Principles of Personal Data Processing.....	4
Conditions of Personal Data Processing	4
Confidentiality of Personal Data.....	5
Publicly Accessible Sources of Personal Data	5
Assigning the processing of Personal Data to another person	5
The processing of Personal Data of the Russian Federation citizens	5
Cross-Border Transfer of Personal Data.....	6
3. RIGHTS OF THE PERSONAL DATA SUBJECT	6
Consent of the Personal Data Subject to the processing his Personal Data.....	6
Rights of the Personal Data Subject	6
4. ENSURING THE SECURITY OF PERSONAL DATA.....	7
5. FINAL PROVISIONS.....	8

1. GENERAL PROVISIONS

The policy regarding to the personal data processing (hereinafter – “Policy”) is developed according to the Federal Law of 27 July 2006 N 152-FZ “On personal data”) (hereinafter – “FZ-152”).

This policy determines the procedure of the personal data processing and measurements to ensure the security of personal data in “SCHNEIDER GROUP” LLC (hereinafter – “Operator”) in order to protect human and citizens’ rights and freedoms during the processing of his personal data, including the protection of the following rights: right of privacy, personal and family secret.

In this Policy the following main terms are used:

automated personal data processing - personal data processing by means of computer technology;

blocking of personal data – the temporary cessation of personal data processing (except for the cases when the processing is needed for personal data specification);

personal data information system – a database that contains personal data as well as information technologies and hardware used for data processing;

anonymization of personal data – actions performed on personal data that do not permit the identity of the individual concerned to be verified solely from such anonymized data;

personal data processing – any action (operation) or a combination of actions (operations) performed both automatically and manually with personal data, including collection, recording, arrangement, accumulation, storage, specification (updating, changing), extraction, use, distribution (including transfer), anonymizing, blocking and destruction of personal data;

operator – state agency, municipal authority, legal entity or individual who independently or in cooperation with other entities organizes and/or processes personal data as well as determines the purposes and scope of personal data processing;

personal data – any information referring directly or indirectly to a particular or identified individual (personal data subject)

provision of personal data – actions related to making the data available to a definite person or a definite range of persons;

distribution of personal data – actions related to making the data available to indefinite range of persons (submission of personal data) or to the familiarization with the personal data to unlimited range of persons, including divulgation in mass media, placement in information and telecommunications networks or providing access to the personal data in any other way;

cross-border transfer of personal data – cross-border transfer of personal data to a foreign state agency, foreign legal entity or individual located in a foreign state.

destruction of personal data – actions performed on personal data contained in the respective database that prevent such data from being restored and (or) actions aimed at the physical destruction of the tangible medium of personal data;

The company is obliged to issue or in any other way to provide unlimited access to this Policy of the personal data processing in accordance with part2, article 18.1 of FZ-152.

2. PRINCIPLES AND CONDITIONS OF PERSONAL DATA PROCESSING

Principles of Personal Data Processing

The Operator's personal data processing is based on the following principles:

- on a legal and equitable basis;
- restriction by achieving specific pre-determined and legal purposes;
- it is not allowed to process personal data for incompatible purposes of personal data collection;
- it is not allowed to combine the data bases containing personal data to be processed for incompatible purposes;
- there shall be processed only personal data that comply with the purposes of their processing;
- the scope and character of personal data to be processed shall comply with the intended purposes;
- it is not allowed to process odd personal data regarding to the stated purposes of the processing;
- ensuring the personal data accuracy, their sufficiency and relevancy regarding to the stated purposes of the processing;
- personal data shall be destroyed or depersonalized upon achieving the set goals as well as when such goals cease to be relevant unless otherwise stipulated by federal laws.

Conditions of Personal Data Processing

Operator processes Personal data if meeting one of the following criteria:

- processing of personal data is carried out with the consent of the data subject to the processing of his personal data;
- personal data processing is required for achieving the purposes stipulated by an international agreement of the Russian Federation or by a law, or for exercise and fulfillment of functions, powers and obligations imposed on operators by the Russian Federation law;
- personal data processing is required for administration of justice or enforcement of a judicial act or an act of another body or official which are enforceable in accordance with the legislation of the Russian Federation concerning enforcement proceedings;
- personal data processing is required for performance of an agreement to which a personal data subject is a party or under which the data subject is a beneficiary or surety, or for conclusion of an agreement on the initiative of a personal data subject or an agreement under which a personal data subject shall be a beneficiary or surety;
- processing of personal data is required for realization of the rights and legitimate interests of an operator or third parties or for the attainment of socially significant objectives, provided that this not cause the rights and freedoms of the personal data subject to be violated;

- public access to the personal data being processed has been granted by or at the request of the personal data subject (hereinafter referred to as “personal data made public by the personal data subject”);
- the personal data being processed are subject to publication or compulsory disclosure in accordance with federal laws.

Confidentiality of Personal Data

Operator and other persons who have obtained an access to personal data shall be obliged to refrain from disclosing to third parties or disseminating those personal data without the consent of the personal data subject, except as otherwise provided by federal laws.

Publicly Accessible Sources of Personal Data

Publicly accessible sources of personal data, including directories and address books may be created for the purposes of information provision. Subject to the written consent of a personal data subject, the surname, first name and patronymic, year and place of birth, address, subscriber number, occupation details of that data subject and other personal data communicated by the personal data subject.

Details of a personal data subject shall at any time be excluded from publicly accessible sources of personal data at the request of the personal data subject or by decision of a court or other authorized state bodies.

Assigning the processing of Personal Data to another person

An operator shall have the right to assign the processing of personal data to another person with the consent of a personal data subject, except as otherwise provided by federal laws, on the basis of a contract concluded with that person, including a state or municipal contract, or by means of adoption of an appropriate act by a state or municipal body (hereinafter referred to as “instruction of an operator”). A person carrying out the processing of personal data on the instruction of an operator shall be obliged to comply with the principles and rules for the processing of personal data which are stipulated by FZ-152 and this Policy.

The processing of Personal Data of the Russian Federation citizens

In accordance with Article 2 of the Federal Law No. 242-FZ of July 21, 2014 on Amending Some Legislative Acts of the Russian Federation in as Much as It Concerns Updating the Procedure for Personal Data Processing in Information-Telecommunication Networks, while the Personal Data collection, including the information and telecommunications network "Internet", Operator shall be obliged to provide the record, systematization, aggregation, storage, clarification (update, modification), extraction of the Personal Data of the Russian Federation citizens with the database, which are on the territory of the Russian Federation, except the following cases:

- the processing of personal data is necessary to achieve the purposes in connection with the implementation of international agreement or with the law for the implementation and performance of functions, powers and duties imposed by the legislation of the Russian Federation on the Operator;

- personal data processing is required for administration of justice or enforcement of a judicial act or an act of another body or official which are enforceable in accordance with the legislation of the Russian Federation concerning enforcement proceedings (hereinafter referred to as “enforcement of a judicial act”);
- personal data processing is required for the execution of the powers of federal executive bodies, bodies of state extra-budgetary funds, executive bodies of state power of the constituent entities of the Russian Federation, local self-government bodies and the functions of organizations participating in the provision of state and municipal services in accordance with the Federal law of 27 July 2010 N 210-FZ “About provision of state and municipal services”, for ensuring the provision of this service and (or) for registration of personal data subjects on the uniform portal of state and municipal services;
- processing of personal data is required for the purposes of professional activities of a journalist and (or) the legitimate activities of a mass medium or for the purposes of scientific, literary or other creative activity, provided that this not cause the rights and freedoms of the personal data subject to be violated.

Cross-Border Transfer of Personal Data

An operator shall be obliged to satisfy itself that the foreign state into whose territory personal data are to be transferred provides adequate protection of the personal data subjects’ rights before commencing the cross-border transfer of personal data.

The cross-border transfer of personal data into the territories of foreign states which do not provide an adequate protection of the personal data subjects’ rights may be carried out in the following cases:

- where the personal data subject has given his written consent to the cross-border transfer of his personal data;
- for the purpose of the performance of a contract to which the personal data subject is a party.

3. RIGHTS OF THE PERSONAL DATA SUBJECT

Consent of the Personal Data Subject to the processing his Personal Data

A personal data subject shall decide whether or not to provide his personal data and shall give consent to the processing thereof freely, of his own will and in his own interest. Consent to the processing of personal data may be given by the personal data subject or his representative in any form which provides evidence of its receipt, except as otherwise established by federal laws.

Rights of the Personal Data Subject

A personal data subject shall have the right to receive information from Operator except in cases this right is limited by federal laws. A personal data subject shall have the right to request an Operator to rectify, block or destroy his personal data in the event that the personal data are incomplete, out-of-date, inaccurate or unlawfully obtained or are not needed for the stated purpose of the processing, and shall have the right to take measures provided for by law to protect his rights.

The processing of personal data for the purpose of the market promotion of goods, work and services by means of making direct contact with a potential consumer with the aid of communications facilities, and for purposes of political campaigning, shall be permitted only on condition of the prior consent of the subject of the personal data.

An operator shall be obliged, upon the request of a data subject, immediately to terminate the processing of his personal data upon abovementioned purposes.

Shall be prohibited for making decisions which give rise to legal consequences for a personal data subject or otherwise affect his rights and legitimate interests to be taken solely on the basis of the automated processing of personal data, except the cases provided by federal laws or with consent of the Personal Data Subject.

Where a personal data subject believes that an Operator is processing his personal data not in compliance with the requirements of FZ-152 or is otherwise violating his rights and freedoms, the personal data subject shall have the right to appeal against the actions or inaction of the operator to the authorized body for the protection of the personal data subjects' rights or through the courts.

A personal data subject shall have the right to protection of his rights and legal interests, including the right to reimbursement for losses and (or) compensation for moral injury.

4. ENSURING THE SECURITY OF PERSONAL DATA

An operator shall be obliged, when processing data, to take or arrange for the taking of such legal, organizational and technical measures as are necessary to protect personal data against unlawful or accidental access to and destruction, alteration, blocking, copying, provision or dissemination of personal data and against other unlawful actions in relation to personal data.

To prevent unauthorized access to the personal data, Operator apply the following organizational and technical measures:

- the appointment of a person responsible for organizing the processing of personal data;
- limitation of number of persons authorized to process personal data;
- restriction of the persons admitted to the processing of personal data;
- familiarization of subjects with the requirements of the federal legislation and regulatory documents of the Operator for the processing and protection of personal data;
- organization of recording, storage and circulation of tangible media containing information with personal data;
- identification of threats to the security of personal data during processing, the formation of threat models on their basis;
- the development on the basis of the threat model of the personal data protection system;
- verification of the readiness and effectiveness of the use of the information protection means;

- restricted access of users to information sources and programs for information processing;
- registration and action record by users of the information system of personal data;
- if necessary, use of screening means, if an intrusion is detected, and an analysis of the protective measures and the protection of the information by means of cryptic means;
- the organization of an access regime to the Operator's territory, the protection of premises with technical means for processing personal data.

5. FINAL PROVISIONS

Other Operator's rights and obligations in connection with the processing of Personal Data are determined by the legislation of the Russian Federation in the jurisdiction of personal data.

Operator's employees who are 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.