

ROSEXPERT-PERSONAL JSC`s Personal Data Processing and protection Policy

I. General provisions

1. The Policy is developed based on the requirements of the Constitution of the Russian Federation, The Labor Code of the Russian Federation, The Civil Code of the Russian Federation, The Federal Federation Government Regulation 'On Approving the Requirements to the Law 'On Personal Data', The Russian Personal Data Protection While Processing in Personal Data Information Systems', The Order of FSTEC of Russia 'On Approving the List and Scope of Planning and Technical Activities for Protection of Personal Data While Processing via Personal Data Information Systems' legislative and other statutory acts of the Russian Federation and legal documents of authorized government bodies.

2. This Personal Data Processing Policy (hereinafter referred to as "**Policy**") stipulates the basic principles, conditions and methods for personal data processing in ROSEXPERT-PERSONAL JSC (hereinafter referred to as "**Company**").

3. Company is obliged to publish the Policy and provide unlimited access to the Policy.

4. Basic terms and definitions used in the Policy:

personal data – any information related to directly or indirectly specified natural person (data subject).

special categories of personal data– personal data concerning race, nationality, political views, religious or philosophical beliefs, health status, private life and record of conviction;

biometric personal data – information that consists the physiological and biological characteristics of a person which allow or confirm the unique identification of that natural person and which are used by the Operator to identify the subject of personal data;

Operator – state authority, municipal authority, legal or private person, who severally or jointly arranges and/or performs personal data processing, as well as defines the aims of personal data processing, the volume of personal data subject to processing and personal data handling.

Personal data processing – any action or a series of actions performed towards personal data with or without the software, including the personal data acquisition, recording, systematization, accumulation, storage, update and alteration, extraction, use, transfer (distribution, presentation, providing access), depersonalization, blocking, deleting and annihilation.

automated personal data processing – personal data processing via PC software.

personal data presentation – personal data disclosure to particular person or certain group of persons.

personal data blocking – temporary interruption of personal data processing (except where processing is required for personal data update or alteration).

personal data annihilation – actions making it impossible to restore personal data volume in the personal data information system and/or resulting in the elimination of tangible personal data carriers.

personal data information system – a set of personal data included into personal data databases, as well as the software and tools used for their processing.

Trans-border transfer of personal data – personal data transfer to a foreign country, foreign government body and foreign natural or legal person.

Company`s service user – natural or legal person, that utilize services of Company;

personal data confidentiality - obligatory for the operator requirement not to disclose to third parties and prevent the presentation of personal data without the consent of the subjects of personal data or other legal grounds;

representative of subject of personal data– a representative determined for employees in accordance with Art. 89 of the Labor Code of the Russian Federation, and for other personal data subjects in accordance with the regulations of current legislation.

5. Personal data of personal data subjects are classified as confidential information, with the exception of information that is subject to distribution in mass media to the extent permitted by applicable federal laws.

II. Purposes of personal data processing

6. Processing of personal data of the subjects of personal data is carried out by the Company with the following aims:

- implementing provisions of the Labor Code of the Russian Federation, the Civil Code of the Russian Federation, the Tax Code of the Russian Federation and other normative acts of the Russian Federation;

- making a decision about employing a job candidate by the Company or a user of the Company's services;

- undertaking and fulfilling obligations under labor contracts, non-state pension provision contracts, compulsory pension insurance contracts;

- undertaking and fulfilling obligations under civil law contracts for the provision of services provided by the Company.

III. Personal data processing principles and conditions

7. When processing personal data, the Company takes into account the need to ensure protection of the rights and freedoms of the subjects of personal data, including protection of the right to privacy, personal and family secrets, and such processing is based on the following principles:

- processing of personal data must be carried out in a legal and fair manner;
- processing of personal data must be limited to achieving specific, pre-defined and legitimate purposes. Processing of personal data incompatible with declared purposes of collecting this data is not permitted;
- merging of databases containing personal data processing of which is carried out for purposes incompatible with each other is not permitted;
- only personal data corresponding to the purposes of processing shall be processed;
- the content and scope of processed personal data shall correspond to declared processing purposes.

The processed personal data must not be excessive in relation to the declared purposes of their processing;

- when processing personal data, the accuracy and sufficiency of personal data as well as, in certain necessary situations, the relevance with respect to the purposes of processing must be ensured. The Company must take necessary measures to remove or clarify incomplete or inaccurate personal data or ensure taking such measures;
- storing personal data must be done in such a form that allows the subject of personal data to be identified for a period no longer than is required by the purposes of processing personal data when such a period of storage of personal data is not stipulated by a federal law, or contract under which the personal data subject acts as a party, beneficiary or guarantor;
- the processed personal data must be destroyed or depersonalized upon achievement of the processing purposes or in the event of a loss of the need to achieve these purposes, unless otherwise provided by federal law.

8. Processing of personal data in the Company is carried out in the following situations:

- processing of personal data is necessary for the performance of a contract to which the subject of personal data is a party or a beneficiary or a guarantor, as well as for entering a contract initiated by the personal data subject or a contract whereby the personal data subject will be a beneficiary or guarantor;
- with the consent of the subject of personal data to the processing of the subject's personal data;
- processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another body or official when these acts are subject to enforcement in accordance with the legislation of the Russian Federation on enforcement proceedings, and to exercise and perform the functions, powers and duties imposed by the Russian Federation legislation on the Company;
- processing of personal data is necessary to protect the life, health or other vital interests of the subject of personal data if obtaining the consent of the personal data subject is impossible;
- when there is processing of personal data to which the subject of personal data provided access to or requested such access to be provided for an unlimited number of persons;
- when there is processing of personal data that are subject to publication or mandatory disclosure in accordance with the federal law;
- in other cases provided for by the legislation of the Russian Federation.

9. Processing of special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, health status, and sexual life is not permitted, except in the following cases:

- the subject of personal data has consented in writing to the processing of his personal data;
- personal data are made by the personal data subject that is publicly accessible;
- processing of personal data is carried out in accordance with the legislation on state social assistance, labor legislation, pension legislation of the Russian Federation;

- processing of personal data is necessary to protect the life, health or other vital interests of other persons and obtaining consent of the subject of personal data is not possible;
- processing of personal data is necessary to exercise the rights of the subject of personal data or third parties, as well as in connection with the administration of justice;
- processing of personal data is carried out in accordance with the legislation on certain types of insurance, with insurance legislation;
- in other cases provided for by the legislation of the Russian Federation.

10. Biometric personal data may be processed in the Company only if there is consent in writing by the subject of personal data, except when processing of biometric personal data is carried out in connection with implementation of international treaties of the Russian Federation on readmission, in connection with administration of justice and judicial acts, and also in situations provided for by the legislation of the Russian Federation on defense, on security, on countering terrorism, on transport security, on countering corruption, on state detective work, on state service, the criminal enforcement legislation of the Russian Federation, the Russian Federation legislation on entering into and leaving the Russian Federation, on citizenship of the Russian Federation.

Biometric personal data are not processed in the Company except for the photographic image of the subject of personal data, provided that the conditions set forth by the legislation are observed.

11. When collecting personal data, including by means of the information and telecommunication network "the Internet", the Company ensures recording, systematization, accumulation, storage, clarification (updating, modification), and extraction of personal data of citizens of the Russian Federation by using the databases located on the territory of the Russian Federation.

Cross-border transfer of personal data in the Company may be carried out only within the limits set forth by the current legislation.

12. The Company may use publicly accessible sources of personal data (including directories, address books) with the purposes of information support. Public sources of personal data with may include, with written consent of the personal data subject, his surname, first name, patronymic, year and place of birth, address, subscriber number, information about occupation and other personal data reported by the subject of personal data.

Information about the subject of personal data must be at any time excluded from publicly accessible personal data sources at the request of the personal data subject or by a ruling of the court or other authorized bodies.

13. The Company has the right to process personal data upon instruction from another person (operator), unless otherwise stipulated by federal law, on the basis of an agreement entered into with this person (operator), including a state or municipal contract, or on the basis of a relevant act adopted by a state or municipal body (hereinafter - the instruction of the operator).

A company processing personal data upon instructions of the operator must comply with principles and rules for processing of personal data set forth by Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" (hereinafter - the Federal Law "On Personal Data").

The instruction of the operator:

- must define a list of actions (operations) to be performed with personal data by the Company as well as the purposes of processing personal data;
- must establish the obligation of the Company to respect the confidentiality of personal data and ensure the security of personal data when processing;
- the requirements for the protection of personal data processed in accordance with Article 19 of the Federal Law "On Personal Data" must be stated.

14. A company that processes personal data upon instructions of another person who is a personal data operator is not obliged to obtain the consent of the personal data subject to processing his personal data.

15. In the event that another person who is the operator of personal data entrusts the processing of personal data to the Company, the responsibility to the personal data subject for the actions of the Company shall be borne by that person. The Company is liable to the person who has entrusted the Company with the processing of personal data.

16. When processing personal data, the Company must ensure its confidentiality, i.e. not to disclose to third parties or distribute personal data without the consent of the personal data subject, unless otherwise provided by federal law.

IV. Subjects of personal data

17. List of subjects of personal data, who have their personal data processed in the Company:

- Company's employees, job applicants, former employees;

- users of the Company's services (private persons);
- employees or job applicants of a law person (private entrepreneur)- user of the Company`s services (employees or job applicants of Company`s contractual counterparty);
- employees of a law person (private entrepreneur)- user of the Company`s services (employees of Company`s contractual counterparty) if authorized;
- any other private person whose personal data became known to the Company by virtue of providing him with social benefits, guarantees and compensations from the Company.

V. List of personal data processed at the Company

18. The Company processes the following categories of personal data: surname, name, patronymic, date, month, year of birth; residence address; marital status; property status; education; profession; individual taxpayer number; data of the insurance certificate and other personal data processed by the Company on the basis of the legislation of the Russian Federation.

The Company may also process other personal data of users of the Company's services, considering the personal data processing purposes stated in Section 6 of the Policy

19. The list of personal data of employees processed at the Company is stipulated by the Labor Code of the Russian Federation and corporate statutory acts.

VI. Processing and protection of personal data in the Company

20. Processing of personal data is carried out with the consent of the subjects of personal data, unless otherwise provided by the legislation of the Russian Federation.

21. Processing of personal data contained in the personal data information system or extracted from such a system is carried out by means of computer technology; however, such activities with personal data as the usage, clarification, distribution, destruction of personal data with respect to each of the personal data subjects, are carried out with the direct participation of a person.

22. Only those employees of the Company whose duties include the processing of personal data are allowed to process personal data.

The aforementioned employees have the right to receive only that personal data that they need to fulfill their official duties.

23. Processing of personal data is carried out by means of:

- receiving information containing personal data directly from the subjects of personal data in oral and written form;

- provision by the subjects of personal data of originals of required documents;
- receiving duly certified copies of documents containing personal data or copying of original documents;
- receiving personal data when making requests to public authorities, state extra-budgetary funds, other state bodies, local self-government bodies, commercial and non-commercial organizations, private persons in cases and in the manner provided for by the legislation of the Russian Federation;
- obtaining personal data from publicly accessible sources;
- recording (registering) of personal data in journals, books, registers and other forms for recording information;
- entering personal data into the information systems of the Company;
- using other means and methods of recording personal data obtained within the framework of the Company's business.

24. Transfer of personal data to third parties is allowed with the written consent of the subjects of personal data, except when it is necessary to prevent threats to life and health of subjects of personal data, as well as in other cases established by the legislation of the Russian Federation.

When transferring personal data to third parties in accordance with signed agreements, the Company ensures mandatory compliance with requirements of the legislation of the Russian Federation and the Company's normative documents in the area of personal data.

25. Transfer of personal data to the authorized executive authorities (the Federal Tax Service of the Russian Federation, the Pension Fund of the Russian Federation, the Federal Fund for Mandatory Medical Insurance of the Russian Federation, etc.) is carried out in the Company in accordance with the requirements of the legislation of the Russian Federation.

26. Storage of personal data in the Company is carried out in such a form that allows the subject of personal data to be identified for no longer period than is required by the purpose of personal data processing. Upon achievement of processing objectives or in the event when achievement of processing objectives becomes unnecessary, personal data must be destroyed. Time limits to store personal data in the Company are determined in accordance with the legislation of the Russian Federation and normative documents of the Company.

27. Making decisions that will create legal consequences with respect to the subject of personal data or will otherwise affect his rights and legitimate interests

exclusively on the basis of automated processing of personal data, except as provided for by federal laws, is prohibited in the Company.

28. The Company takes necessary and sufficient organizational and technical measures to protect personal data, including use of information security tools, detection of unauthorized access, restoration of personal data, establishment of rules for access to personal data, as well as monitoring of measures being undertaken to ensure security and evaluation of the effectiveness of measures being undertaken.

29. The Company recognizes the need to provide appropriate level of security of personal data processed within the framework of the Company's core business both from the point of view required by normative documents of the Russian Federation as well as from the point of view justified by assessing business risks.

VII. Rights of subjects of personal data

30. The subject of personal data has the right to:

- receive, in accordance with the legislation of the Russian Federation, information concerning processing of his personal data in the Company, except for cases set forth by the legislation of the Russian Federation;
- require correction of incorrect or incomplete personal data, as well as data processed in violation of requirements of the legislation of the Russian Federation;
- require blocking or destruction of his personal data in the event that personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing;
- require notifying all persons who had previously been informed of his incorrect or incomplete personal data about all changes made to the data;
- withdraw consent to processing of his personal data;
- appeal against actions or inaction of the Company when processing his personal data in accordance with the legislation of the Russian Federation;
- exercise other rights provided for by the legislation of the Russian Federation.

VIII. Obligations of the Company as a personal data operator

31. When processing personal data, the Company is obliged to:

- take necessary measures to fulfill the duties of the operator, stipulated by the legislation of the Russian Federation in the area of processing and protection of personal data;
- explain to the subject of personal data the legal consequences of refusing to provide personal data if this is mandatory in accordance with the legislation of the Russian Federation;
- block unlawfully processed personal data;
- discontinue the processing of personal data in accordance with the legislation of the Russian Federation;
- notify the subject of personal data about elimination of violations committed in regard to his personal data or destruction thereof;
- provide, at the request of the subject of personal data or his representative, information regarding the processing of his personal data, in accordance with the procedure established by the legislation of the Russian Federation and normative acts of the Company.

32. In order to take measures necessary to fulfill the duties established by the legislation of the Russian Federation and the Company's normative documents, the person responsible for organizing the processing of personal data in the Company is appointed by a directive of the General Director of the Company.

33. The person responsible for organizing the processing of personal data in the Company receives instructions directly from the General Director of the Company and is accountable to him.

34. The person responsible for organizing the processing of personal data in the Company is obliged, in particular, to:

- organize the adoption of legal, organizational and technical measures to ensure protection of personal data processed by the Company from unauthorized or accidental access to personal data, destruction, modification, blocking, copying, dissemination of personal data, as well as other illegal actions in respect to personal data;
- organize exercising of internal control over compliance within the Company with the requirements of the legislation of the Russian Federation and normative documents of the Company in the area of personal data, including requirements for the protection of personal data;

- organize informing the Company's employees about provisions of the legislation of the Russian Federation on personal data, normative documents of the Company related to processing of personal data, as well as requirements for the protection of personal data;
- organize reception and processing of appeals and requests from subjects of personal data or their representatives as well as exercise control over the reception and processing of such appeals in the Company.

IX. Liability for breach of the requirements in the area of processing and protection of personal data

35. Liability for breach of the requirements established by legislation of the Russian Federation and normative acts of the Company in the area of processing and protection of personal data is determined in accordance with the legislation of the Russian Federation.