

## 1. General Definitions

The following terms and definitions are used in this Personal Data Processing and Protection Policy (hereinafter referred to as the Policy):

**Automated processing of personal data** shall mean processing of personal data using computer engineering means;

**Blocking of personal data** shall mean temporary cessation of processing of personal data (with the exception of cases when processing is necessary to clarify personal data);

**Personal data information system** shall mean a set of personal data contained in databases and the information technologies and technical means ensuring their processing;

**Depersonalization of personal data** shall mean actions that make it impossible to determine the ownership of personal data by a certain subject of personal data without usage of additional information;

**Personal data operator (Operator)** shall mean a governmental agency, municipal authority, legal entity or individual that independently or jointly with other persons organizes and (or) carries out personal data processing, as well as determines the purposes of personal data processing, content of the personal data subject to processing, actions (operations) carried out and performed with the personal data.

In this Policy, the personal data operator shall be understood to be Limited Liability Company "Panna" (Panna LLC);

**Personal data processing** shall mean any action (operation) or a set of actions (operations) with the personal data performed with or without usage of the automation facilities. Personal data processing shall include, among other things:

- ✓ collection;
- ✓ recording;
- ✓ systematization;
- ✓ accumulation;
- ✓ storage;
- ✓ clarification (updating, modification);
- ✓ extraction;
- ✓ usage;
- ✓ transfer (distribution, provision, access);
- ✓ depersonalization;
- ✓ blocking;
- ✓ deletion;
- ✓ destruction;

**Publicly available personal data** shall mean personal data, access to which is provided to an unlimited number of persons with the consent of the personal data subject or to which, in accordance with federal laws, the requirement to maintain confidentiality does not apply;

**Personal data** shall mean any information related to a directly or indirectly identified or determinable individual (personal data subject);

**Personal data authorized by the personal data subject for distribution** shall mean personal data, the access to which is provided to an unlimited number of persons by the personal data subject by giving consent to the processing of personal data authorized by the personal data subject for distribution in accordance with the procedure prescribed by Federal Law No. 152-FZ dd. 27.07.2006 "On Personal Data";

**Personal data provision** shall mean actions aimed at disclosing personal data to a certain person or a certain group of persons;

**Employee** shall mean an individual who has entered into an employment relationship with the employer;

**Employer** shall mean a legal entity (organization) that has entered into an employment relationship with the employee.

In this Policy, the Employer shall be understood to be the Limited Liability Company "Panna" (LLC Panna);

**Distribution of personal data** shall mean actions aimed at disclosure of personal data to an indefinite number of persons;

**Cross-border transfer of personal data** shall mean transfer of personal data to the territory of a foreign state to a foreign government agency, a foreign individual or a foreign legal entity.

**Personal data subject** shall mean an individual whose personal data are processed.

**Destruction of personal data** shall mean actions resulting in the impossibility to restore the content of such personal data in the personal data information system and (or) resulting in destruction of material media where the personal data were stored.

## **2. General provisions**

2.1. The Policy of Panna LLC regarding the processing of personal data and the accomplishable requirements for protection has been developed in accordance with the Constitution of the Russian Federation, the Labour Code of the Russian Federation, Federal Law No. 152-FZ dd. 27.07.2006 “On Personal Data” (hereinafter referred to as the Law on Personal Data) and other statutory and regulatory enactments of the Russian Federation.

2.2. The Policy of Panna LLC (INN (Taxpayer Identification Number) 7722685589, 111024, city of Moscow, 5th Kabelnaya Street, house 3, building 7) (hereinafter also referred to as the “Company”) regarding the processing of personal data (hereinafter also referred to as the “Policy”) determines the position and intentions in the field of processing and protection of personal data, in order to ensure compliance with and protection of the rights and freedoms of each person and, in particular, the right to privacy, personal and family secrets, protection of one's honour and good name.

2.3. The organization of ensuring the security of personal data in the Company is assigned to the person responsible for organization of the personal data processing, appointed by the order of the General Director.

2.4. Responsibility for violation of the requirements of the legislation of the Russian Federation and regulatory acts of the Company in the field of processing and protection of the personal data shall be determined in accordance with the legislation of the Russian Federation.

2.5. The Policy shall apply to all personal data of subjects processed in the Company with or without usage of the automation facilities.

2.6. Any personal data subject shall have access to this Policy, including through the use of the Internet network.

2.7. The Company shall periodically update this Policy and shall have the right to unilaterally change its terms and conditions at any time.

The Company recommends to check regularly the content of this Policy with respect to its possible changes.

2.8. Unless otherwise provided by the Policy, all changes introduced to it shall come into force from the date specified in the Policy.

2.9. In all other respects not provided for by this Policy, the Company shall be guided by the provisions of the current legislation of the Russian Federation.

2.10. The Company shall process the personal data in the following cases:

- ✓ carrying out by the Company of activities in the field of electronic commerce as the owner of the Internet page <https://panna.ru/>, <https://panna-stitch.com/>, <http://forum.panna.ru/>, <https://miadolla.ru/>, <https://miadolla.com/>, <http://obnimashki.ru/>, <https://woolla.ru/>, <https://woolla.com/>, <http://freya-crystal.ru/>, <https://freyja-crystal.com/>, <http://klart.ru/>, <http://hobbius.net/>, <https://russianpencil.ru/>;

- ✓ registration and regulation of labour and other relations of the Company directly connected therewith;

- ✓ carrying out by the Company of normal business activities as a legal entity.

2.11. The specific terms and conditions of processing, including the purposes of personal data processing, categories of personal data subjects, as well as the categories and the list of processed personal data shall be presented in the relevant annexes to this Policy, which shall be an integral part thereof.

### 3. Basic rights and obligations of the Company

3.1. The Company shall have the right to:

- ✓ independently determine the composition and the list of measures necessary and sufficient to ensure the fulfilment of obligations stipulated by the Law on Personal Data and statutory and regulatory enactments adopted in accordance therewith, unless otherwise provided by the Law on Personal Data or other Federal laws;

- ✓ entrust the processing of personal data to another person with the consent of the personal data subject, unless otherwise provided by the Federal laws, under an agreement entered into with this person. The person carrying out personal data processing on behalf of the Company shall be obliged to comply with the principles and rules for personal data processing stipulated by the Law on Personal Data;

- ✓ in the event of withdrawal by the personal data subject of its consent to the personal data processing, the Company shall have the right to continue personal data processing without the consent of the personal data subject in case of availability of the grounds specified in the Law on Personal Data.

3.2. The Company shall be obliged to:

- ✓ organize the personal data processing in accordance with the requirements of the Law on Personal Data;

- ✓ respond to requests and inquiries from personal data subjects and their legal representatives in accordance with the requirements of the Law on Personal Data;

- ✓ provide the authorized authority for 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 this authority, with the necessary information within 10 days from the date of receipt of such a request.

3.3. In some cases, as described below, the Company shall receive and process the personal data automatically by the means of meter programs used on the websites and online services of the Company. The Company uses cookies for work with such data.

Cookies are small text files containing some information that are downloaded to a device of a user (PC, smartphone, etc.) while browsing a web page.

Cookies allow websites to recognize the consumer devices, to determine user preferences and to collect statistics on how users interact with the websites in order to improve the user experience of such a website or to eliminate various errors or bugs that may occur from time to time. Therewith, the list of purposes for the achievement of which cookies are necessary is not exhaustive and depends on the specific website that the user visits or otherwise uses.

In particular, the following cookies may be used on the websites of the Company:

Category	Description and intended usage
<b>Technical cookies</b>	These cookies are essential for operation of the websites and online services of the Company, and without them they are unable to function in an appropriate manner. Technical cookies allow users to navigate such websites and services, view their various sections, fill out forms and click checkboxes there.
<b>Analytical cookies</b>	These cookies collect information about how often users visit the websites and online services of the Company, which sections they view, which links they click and how they navigate such websites and services in general.
<b>Preference cookies</b>	These cookies remember the settings and choices that users make on the websites and

	online services of the Company (language, region, search inquiries, etc.) and thereby ensure that users receive a personalized experience when using such websites and services.
<b>Marketing cookies</b>	These cookies collect information about the actions taken by users both on the websites and online services of the Company and on third-party websites in order to display the most relevant advertising to users, evaluate the effectiveness of such advertising and limit the number of advertising impressions for such users on the websites and online services of the Company.

Users can also independently limit or completely disable the installation of cookies through the settings of their web browser. However, without the use of technical cookies, the websites and online services of the Company may not work correctly, and some of their functionality may be unavailable.

The Company, using cookies, does not pursue the goal of identifying a specific user of the websites and online services of the Company.

#### **4. Basic rights of the personal data subject**

4.1. The personal data subject shall have the right to:

- ✓ receive information regarding the processing of its personal data, except for cases stipulated by the Federal laws. Information shall be provided to the personal data subject by the Company in an accessible form, and it should not contain personal data related to other personal data subjects, except for the cases where there are legal grounds for disclosure of such personal data. The list of information and the procedure for its obtaining are established by the Law on Personal Data;
- ✓ demand from the Company the rectification of its personal data, its blocking or destruction in the events when personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as to take measures provided by the law for protection of its rights;
- ✓ set forth conditions of prior consent when processing personal data for the purposes of promoting goods, works and services on the market;
- ✓ exercise free and unrestricted access to its personal data, including the right to receive copies of any record containing personal data, except for the cases provided for by the legislation of the Russian Federation;
- ✓ revoke consent to the processing of its personal data in the form established by the legislation of the Russian Federation;
- ✓ demand the Company or its authorized person to notify all persons to whom there were previously provided incorrect or incomplete personal data about all changes, deletions or additions made therein;
- ✓ appeal in court any illegal actions or inactions of the Company or its authorized person in the processing and protection of personal data;
- ✓ make proposals concerning personal data protection measures.

#### **5. Purposes of personal data collection**

5.1. The processing of personal data is limited by achievement of specific, predetermined and legitimate purposes. The processing of personal data that is incompatible with the purposes of personal data collection shall not be allowed.

5.2. The processing of personal data by the Company shall be carried out for the following purposes:

- ✓ **Personal data of employees of the Company:**
  - maintaining personnel records;
  - hiring and firing of an employee;
  - organization of registration of employees for individual (personalized) accounting with the compulsory pension insurance system;
  - transfer of an employee to another work;
  - registration of all types of vacations;
  - registration of business trips;
  - maintaining a staffing schedule;
  - processing of a personal card of an employee;
  - maintaining a time record;
  - salaries accounting;
  - opening of bank salary cards;
  - transfer of wages to the bank salary cards;
  - accounting and registration of travel expenses;
  - calculation and transfer of vacation allowance to salary card of an employee;
  - calculation of sick leave certificates for an employee of the Company;
  - severance settlements with the employees of the Company upon their dismissal;
  - submission of reports on insurance contributions to the Pension Fund of the Russian Federation;
  - submission of reports to the Federal Tax Service;
  - execution of other documents related to the performance of labour relations with an employee;
  - filling out and submission to the executive authorities and other authorized organizations the required forms of reporting.
- ✓ **Personal data of applicants for vacant positions of the Company:**
  - search and recruitment of personnel;
  - creation, storage, modification of the resume database.
- ✓ **Personal data of relatives of the employees of the Company:**
  - for the purpose of implementation and performance of functions, powers and authorities and duties stipulated by the Labour Code of the Russian Federation, in particular by Articles 228-230 of the Labour Code of the Russian Federation.
- ✓ **Personal data of visitors to the Company:**
  - implementation of the access control arrangements.
- ✓ **Personal data of employees of the Company's counterparties:**
  - execution of the rights and legitimate interests of the Company within the framework of civil law relations with the counterparties, provided that this shall not violate the rights and freedoms of the personal data subject.
- ✓ **Personal data of participants (founders), members of collegial bodies and affiliates of the Company:**
  - for the purpose of implementation of functions, powers and duties imposed on the Company by the legislation of the Russian Federation, in particular: Federal Law dd. 08.08.2001 No. 129-FZ "On State Registration of Legal Entities and Individual Entrepreneurs" and Federal Law dd. 08.02.1998 No. 14-FZ "On Limited Liability Companies".
- ✓ **Personal data of users of the website and other services of the Company (buyers, sellers, etc.):**
  - Use, including visiting, of the websites of the Company and relevant mobile applications (hereinafter collectively referred to as the "Sites"), as well as other services of the Company in accordance with the provided functionality, including registration and authorization on the Sites and in such services;
  - Placing orders (goods and services) on the Sites of the Company and their subsequent delivery (return) within the limits of the Russian Federation;

- Organization and holding by the Company of promotions, competitions and events, including subsequent presentation of prizes and payment of rewards to the winners;
- Delivery of advertising;
- Quality control of the use of the Sites and other services of the Company, as well as collection of statistics and implementation of other analytics in relation to the Sites and other services of the Company.

5.3. The processing of personal data of employees may be carried out solely for the purpose of ensuring compliance with the laws and other statutory and regulatory enactments.

## **6. Legal grounds for personal data processing**

6.1. The legal ground for personal data processing is a set of statutory and regulatory enactments, pursuant to which and in accordance with which the Company processes personal data, including:

- ✓ Constitution of the Russian Federation;
- ✓ Civil Code of the Russian Federation;
- ✓ Labour Code of the Russian Federation;
- ✓ Tax Code of the Russian Federation;
- ✓ Federal Law dd. 08.02.1998 No. 14-FZ “On Limited Liability Companies”;
- ✓ Federal Law dd. 06.12.2011 No. 402-FZ “On Accounting”;
- ✓ Federal Law dd. 15.12.2001 No. 167-FZ “On Compulsory Pension Insurance in the Russian Federation”;
- ✓ other statutory and regulatory enactments governing relations related to the activities of the Company;

6.2. The legal ground for personal data processing also includes:

- ✓ Articles of Association of Panna LLC;
- ✓ agreements entered into by and between the Company and personal data subjects;
- ✓ consent of the personal data subjects to the processing of their personal data.

## **7. Volume and categories of processed personal data**

7.1. The content and volume of processed personal data should correspond to the stated purposes of processing provided for in Section 5 of this Policy. The processed personal data should not be excessive in relation to the stated purposes of their processing.

7.2. The Company may process the personal data of the following categories of personal data subjects:

- ✓ Personal data of employees of the Company:
  - surname, name, patronymic;
  - date and place of birth;
  - nationality;
  - sex;
  - marital status;
  - address of registration and actual place of residence;
  - address of temporary registration (in case of arrival from another region);
  - contact information (phone number, email addresses);
  - information on composition and members of the family;
  - information on education;
  - passport details (internal passport, passport for traveling abroad);
  - driving licence details;
  - certificate of registration with the tax authority and assignment of INN (Taxpayer Identification Number);
  - state pension insurance certificate;
  - information on military registration;
  - information on the image of the face (photo);
  - bank (salary) card details;



- bank account details;
- information on the absence/availability of a criminal record;
- information on being under investigation;
- information on imposition of administrative sanctions;
- information about credit history;
- contents of the employment agreement;
- contents of the declaration submitted to the tax inspection;
- information contained in the Personal card T-2;
- information about the amount of salary.
- ✓ Personal data of relatives of the employees of the Company:
  - surname, name, patronymic;
  - place of work, position;
  - home address;
  - contact phone number.
- ✓ Personal data of participants (founders), members of collegial bodies and affiliates of the Company:
  - surname, name, patronymic;
  - date of birth;
  - passport details;
  - contact phone numbers and addresses;
  - other information provided in accordance with the laws of the Russian Federation.
- ✓ Personal data of applicants for vacant positions of the Company:
  - surname, name, patronymic;
  - date of birth, age;
  - place of birth;
  - place of actual residence;
  - contact information;
  - education;
  - additional knowledge and skills;
  - expected income level;
  - work history;
  - family composition;
  - hobbies, sports;
  - personal qualities.
- ✓ Personal data of visitors to the Company:
  - passport details of the visitor;
- ✓ Personal data of employees of the Company's counterparties:
  - surname, name, patronymic;
  - date of birth;
  - passport details;
  - information on registration at the place of residence;
  - INN (Taxpayer Identification Number);
  - contact phone numbers and addresses.

7.2. Information related to the personal data may be contained:

- ✓ in paper form;
- ✓ on electronic media;
- ✓ in the information and telecommunication networks and other information systems.

7.3. The Company shall independently establish the methods of personal data processing depending on the purposes of such processing and the material and technical capabilities of the Company.

7.4. The personal data processed by the Company may be contained in the following documents (copies of the specified documents):

✓ **Personal data of employees of the Company:**

- passport (or other identity document);
- employment record book;
- state pension insurance certificate;
- certificate of registration with the tax authority and assignment of INN (Taxpayer Identification Number);
- driving licence;
- marriage/divorce certificates;
- birth certificates of children;
- certificate from the Civil Registry Office;
- military registration documents – for persons bound to military service and persons who are subjects to enlistment for military service;
- documents on education, qualification or availability of special knowledge, special training;
- employment agreement;
- Personnel Orders: on hiring and firing of an employee, on transfer of an employee to another work, on provision of all types of leave, on sending on a business trip;
- grounds (applications and other documents) for the Personnel Orders;
- certificates issued at the request to an employee for submission to whom it may concern;
- employee personal record form (Form T-2);
- staffing schedule (Form T-3);
- time sheets;
- salary register and other documents containing information on labour remuneration;
- reporting on insurance contributions to the Pension Fund of the Russian Federation;
- reporting to FNS (Federal Tax Service);
- applicant questionnaire;
- curriculum vitae;
- employee characteristics issued by the HR Officer;
- sick leave certificates;
- employment exit checklist;
- travel documents;
- other documents containing personal data required by the employer within the framework of labour relations with the employee, including those presented in certain cases in accordance with the current legislation of the Russian Federation when concluding an employment agreement (for example, the results of a medical examination with respect to fitness for performance of employment duties).

✓ **Personal data of relatives of the employees of the Company:**

- marriage/divorce certificates;
- birth certificates of children;
- certificate from the Civil Registry Office;
- employee personal record form (Form T-2);
- applicant questionnaire;
- other documents required for the employer within the frameworks of labour relations with the employee.

✓ **Personal data of participants (founders), members of collegial bodies and affiliates of the Company:**

- register of members/founders of the Company;
- questionnaires of members of collegial bodies of the Company;



- materials for meetings of collegial bodies of the Company;
- other documents containing personal data and intended for official use;
- ✓ **Personal data of applicants for vacant positions of the Company:**
  - candidate questionnaire;
  - applicant curriculum vitae;
  - character reference of an applicant from previous places of work in case of need.
- ✓ **Personal data of visitors of the Company in the visitor record book.**
- ✓ **Personal data of employees of the counterparties of the Company:**
  - powers of attorney;
  - powers of attorney register;
  - agreements with counterparties;
  - minutes of meeting.
- ✓ **Personal data of users of the website and other services of the Company (buyers, sellers, etc.):**
  - user ID;
  - surname, name, patronymic;
  - Contact information (phone number, email address, nicknames and IDs in instant messengers, social networks, etc.);
  - Information about usage of the functionality of the Sites or other services of the Company (e.g. about purchased services, enabled subscriptions, etc.);
  - Information collected through the meter programs, including technical information about the consumer devices and identifiers (cookies, device geolocation, metadata, etc.);
  - Prize delivery address (in case of winning);
  - Bank details for transfer of the reward (in case of winning);
  - Other data in accordance with the terms and conditions of promotions and competition (in case of need);
  - Other data independently provided by the individuals to the Company (as part of filling out of information in personal accounts on the Sites or in other services of the Company) - for example, sex and age.

## **8. Procedure for and conditions of the personal data processing**

8.1. The personal data processing shall be carried out by the Company in accordance with the requirements of the legislation of the Russian Federation and for the purposes determined in Section 5 of this Policy.

8.2. The volume and nature of the processed personal data, as well as the methods of personal data processing should correspond to the purposes of personal data processing.

8.3. The personal data processing shall be carried out with the consent of the personal data subjects to the processing of their personal data, as well as without such consent or without consent from a third party, but only in cases stipulated by the legislation of the Russian Federation.

8.4. The consent to the personal data processing may be given by the personal data subject or its representative in any form that allows to confirm the fact of its receipt. The consent to the processing of personal data of employees of the Company and applicants for the vacant positions in the Company shall be executed only in written form.

8.5. The Company shall carry out both automated and non-automated processing of personal data.

8.6. Only those employees of the Company whose job responsibilities include the personal data processing shall be admitted to the personal data processing.

8.7. The personal data processing shall be carried out by:

- ✓ obtaining personal data in oral and in written form directly from the personal data subjects;
- ✓ obtaining personal data from publicly available sources;
- ✓ entering of personal data to the journals, registers and information systems of the Company;
- ✓ using other methods of personal data processing.

8.8. Disclosure to the third parties and distribution of the personal data without the consent of the personal data subject shall not be allowable, unless otherwise provided for by the Federal Law. The consent to the personal data processing permitted by the personal data subject for distribution shall be executed separately from the other consents of the personal data subject to the processing of its personal data.

8.9. The transfer of personal data to the inquiry bodies and investigation authorities, the Federal Tax Service, the Pension Fund of the Russian Federation, the Social Insurance Fund and other authorized executive bodies and organizations shall be carried out in accordance with the requirements of the legislation of the Russian Federation.

8.10. The Company shall undertake necessary legal, organizational and technical measures for protection of the personal data from unauthorized or accidental access thereto, destruction, modification, blocking, distribution and other unauthorized actions, including:

- ✓ determine the threats to the security of personal data during their processing;
- ✓ adopt local normative acts and other documents regulating relations in the field of processing and protection of the personal data;
- ✓ appoint persons responsible for ensuring the safety of personal data in the structural divisions and information systems of the Company;
- ✓ create necessary conditions for working with the personal data;
- ✓ organize the accounting of documents containing personal data;
- ✓ organize work with the information systems wherein the personal data is processed;
- ✓ keep personal data under conditions that ensure their safety and exclude unauthorized access thereto;
- ✓ organize training of employees of the Company carrying out personal data processing.

8.11. The Company shall have the right to entrust the personal data processing to another person if the following conditions are met:

- ✓ entrustment of the personal data processing shall be carried out under an agreement entered into with this person;
- ✓ the consent of the subjects to the entrustment of their personal data processing to another person has been received.

8.12. The Company shall keep personal data in a form that makes it possible to identify the personal data subject as long, and no longer, than required by the purposes of personal data processing, unless the period for storage of the personal data is established by the Federal Law or an agreement.

8.13. In the course of collection of the personal data, including through the information and telecommunications network Internet, the Company shall ensure the recording, systematization, accumulation, storage, clarification (updating, modification), extraction of personal data of citizens of the Russian Federation using databases located within the territory of the Russian Federation, except for cases specified in the Law on Personal Data.

## **9. Updating, correcting, deletion and destruction of personal data, responses to the requests from the subjects for access to the personal data**

9.1. Confirmation of the fact of personal data processing by the Company, the legal grounds and purposes of personal data processing, as well as other information specified in Part 7 of Article 14 of the Law on Personal Data, shall be provided by the Company to the personal

data subject or its representative upon request or upon receipt of an inquiry from the personal data subject or its representative.

The provided information shall not include personal data related to the other personal data subjects, except in cases of availability of legal grounds for disclosure of such personal data.

The inquiry should contain:

- ✓ number of the main document certifying the identity of the personal data subject or its representative, information on the date of issue of the said document and the authority that issued it;

- ✓ information confirming the participation of the personal data subject in relations with the Company (number of the agreement, date of the agreement, conventional verbal designation and (or) other information), or information otherwise confirming the fact of personal data processing by the Company;

- ✓ signature of the personal data subject or its representative.

The inquiry 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.

To the extent that the request (inquiry) of the personal data subject shall not contain all necessary information in accordance with the requirements of the Law on Personal Data or the subject shall not have the right to access the requested information, then a reasoned refusal shall be sent to it.

The right of the personal data subject to access to its personal data may be limited in accordance with Part 8 of Article 14 of the Law on Personal Data, including if access of the personal data subject to its personal data violates the rights and legitimate interests of the third parties.

9.2. In the event of determining the inaccurate personal data upon a request by a personal data subject or its representative or at their inquiry or at the inquiry of Roskomnadzor (Federal Service for Supervision of Communications, Information Technology, and Mass Media), the Company shall block the personal data related to this personal data subject from the moment of such request or receipt of the said request for the verification period, unless blocking the personal data shall violate the rights and legitimate interests of the personal data subject or the third parties.

In the event of confirmation of the fact of inaccuracy of the personal data, the Company, based on the information provided by the personal data subject or its representative or Roskomnadzor (Federal Service for Supervision of Communications, Information Technology, and Mass Media), or other necessary documents, shall clarify the personal data within seven business days from the date of submission of such information and shall cancel the blocking of the personal data.

9.3. In the event of determining the unlawful processing of personal data upon a request (inquiry) of a personal data subject or its representative or Roskomnadzor (Federal Service for Supervision of Communications, Information Technology, and Mass Media), the Company shall block the unlawfully processed personal data related to this personal data subject from the moment of such request or receipt of the inquiry.

9.4. Upon achieving the purposes of personal data processing, as well as in the event of withdrawal on the part of the personal data subject of consent to their processing, the personal data shall be subject to destruction, unless:

- ✓ otherwise provided by the agreement to which the personal data subject is a party, beneficiary or guarantor;

- ✓ the Company has no right to process the personal data without the consent of the personal data subject on the grounds stipulated by the Law on Personal Data or other Federal Laws;

- ✓ otherwise provided by another agreement between the Company and the personal data subject.

## **10. Personal data protection**

10.1. Protection of the rights of the personal data subjects from the unlawful use of their personal data or their loss shall be ensured by the Company, in accordance with the procedure established by the legislation of the Russian Federation and local acts of the Company, by implementing a set of organizational and technical measures to ensure their security.

10.2. In order to implement measures on ensuring the safety of the personal data, the following persons shall be appointed by the Order of the General Director of the Company:

- a person responsible for organization of the personal data processing;
- a person responsible for the physical security of the personal data;
- a commission on the matters of processing and protection of the personal data.

10.3. The receipt and processing of the personal data by the authorized persons shall be carried out after signing by the personal data subject of consent to the processing of its personal data, in cases where it is required by the legislation of the Russian Federation.

10.4. Documents containing the personal data should be kept in the securely locked storage facilities (their storage in unlocked cabinets shall be allowed, provided that uncontrolled access of third parties to the storage facilities (offices) is excluded).

10.5. Storage of personal data in the structural subdivisions of the Company, whose employees have access to the personal data, shall be carried out in accordance with the procedure that excludes access to them by the third parties.

10.6. Organization of protection of the personal data in the information systems of the Company shall be carried out within the frameworks of the information security system operating in the Company. Access to the information systems of the Company containing personal data shall be provided by the system of passwords, as well as by the software and hardware tools for protection of information.

10.7. The premises where the personal data shall be processed must ensure the safety of technical equipment and information protection facilities that process the personal data, as well as the personal data itself, and exclude the possibility of uncontrolled access therein of the third parties.

10.8. During the working day, the keys to the cabinets (boxes, storage facilities) containing the personal data carriers, as well as to the premises where the computer engineering means intended for the personal data processing are located, shall be kept by the responsible employees.

10.9. At the end of the working hours, the premises intended for personal data processing should be put under lock and key, uncontrolled access to such premises should be excluded.

10.10. The storage of the personal data should be carried out in accordance with the procedure that excludes their loss or their unauthorized use.

10.11. The Company has no right to take decisions that generate legal consequences in relation to the personal data subject or otherwise affect its rights and legitimate interests, based solely on automated processing of the personal data.

10.12. It is not allowed to answer questions related to transfer of the personal information by telephone or fax.

10.13. All confidentiality measures in the course of collection, processing and storage of the personal data of an employee shall apply to both paper and electronic information carriers.