

Company Policy

regarding the processing of personal data

1. General Provisions

The personal data processing policy (hereinafter - the Policy) has been developed in accordance with Federal Law of 27.07.2006. № 152-Federal Lay "On personal data" (hereinafter - Federal Lay-152).

This Policy defines the procedure for processing personal data and measures to ensure security of personal data in VOSTOK INNOVACII LLC (hereinafter referred to as the Operator) in order to protect the rights and freedoms of a person and citizen when processing his personal data, including protection rights to privacy, personal and family secrets.

The Policy uses the following basic concepts:

- **automated processing of personal data** - processing of personal data with using computer technology;
- **blocking of personal data** - temporary termination of the processing of personal data (except in cases where processing is necessary to clarify personal data);
- **personal data information system** - a set of data contained in databases personal data, and information technologies that ensure their processing and technical means;
- **anonymization of personal data** - actions as a result of which it is impossible determine without using additional information the belonging of personal data to a specific subject of personal data;
- **processing of personal data** - any action (operation) or a set of actions (operations) performed using automation tools or without using such means with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;
- **operator** - government agency, municipal agency, legal or physical a person who independently or jointly with other persons organizes and (or) carries out processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data;
- **personal data** - any information relating directly or indirectly to a specific or a designated individual (subject of personal data);
- **provision of personal data** - actions aimed at disclosing personal data to a certain person or a certain circle of persons;
- **dissemination of personal data** - actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or to get acquainted with personal data of an unlimited number of persons, including the disclosure of personal data in the media, placement in information and telecommunication networks or providing access to personal data in any other way;
- **cross-border transfer of personal data** - transfer of personal data to the territory foreign state authority of a foreign state, foreign natural or foreign legal entity.
- **destruction of personal data** - actions as a result of which it is impossible to recover the content of personal data in the personal data information system and (or) as a result of which material carriers of personal data are destroyed;

The company is obliged to publish or otherwise provide unrestricted access to this Personal data processing policy in accordance with Part 2 of Art. 18.1. FZ-152.

2. Principles and conditions for the processing of personal data

2.1 Principles of processing personal data

The processing of personal data by the Operator is carried out on the basis of the following principles:

- legality and fair basis;
- limiting the processing of personal data to achieve specific, predetermined and legitimate goals;
- preventing the processing of personal data that is incompatible with the purposes of collecting personal data;
- preventing the merging of databases containing personal data, the processing of which is carried out for purposes incompatible with each other;
- processing only those personal data that meet the purposes of their processing;
- compliance of the content and volume of processed personal data with the stated processing purposes;
- preventing the processing of personal data that is redundant in relation to the stated purposes of their processing;
- ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of processing personal data;
- destruction or depersonalization of personal data upon achievement of the goals of their processing or in case of loss of the need to achieve these goals, if the Operator cannot eliminate the violations of personal data, unless otherwise provided by federal law.

2.2 Conditions for processing personal data

The operator processes personal data if at least one of the following conditions is met:

- processing of personal data is carried out with the consent of the subject of personal data to the processing of his personal data;
- the processing of personal data is necessary to achieve the goals provided for by an international treaty of the Russian Federation or the law, for the implementation and fulfillment of the functions, powers and obligations imposed by the legislation of the Russian Federation on the operator;
- the processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another body or official, subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;
- the processing of personal data is necessary for the performance of an agreement to which the subject of personal data is a party or a beneficiary or guarantor, as well as for concluding an agreement on the initiative of the subject of personal data or an agreement under which the subject of personal data will be a beneficiary or guarantor;
- the processing of personal data is necessary to exercise the rights and legitimate interests of the operator or third parties or to achieve socially significant goals, provided that this does not violate the rights and freedoms of the subject of personal data;
- processing of personal data is carried out, access of an unlimited number of persons to which is provided by the subject of personal data or at his request (hereinafter - publicly available personal data);
- processing of personal data subject to publication or mandatory disclosure in accordance with federal law.

2.3 Confidentiality of personal data

The operator and other persons who have gained access to personal data are obliged not to disclose to third parties and not to distribute personal data without the consent of the subject of personal data, unless otherwise provided by federal law.

2.4 Publicly available sources of personal data

In order to provide information, the Operator may create publicly available sources of personal data of subjects, including directories and address books. The publicly available sources of personal data, with the written consent of the subject, may include his last name, first name, patronymic, date and place of birth, position, contact phone numbers, e-mail address and other personal data provided by the subject of personal data.

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

2.5 Special categories of personal data

The processing by the Operator of special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, health status, intimate life is allowed in cases where:

- the subject of personal data has given his consent in writing to the processing of his personal data;
- personal data made publicly available by the subject of personal data;
- the processing of personal data is carried out in accordance with the legislation on state social assistance, labor legislation, the legislation of the Russian Federation on pensions for state pensions, on labor pensions;
- the processing of personal data is necessary to protect the life, health or other vital interests of the subject of personal data or the life, health or other vital interests of others and obtaining the consent of the subject of personal data is impossible;
- the processing of personal data is carried out for medico-prophylactic purposes, in order to establish a medical diagnosis, the provision of medical and medico-social services, provided that the processing of personal data is carried out by a person who is professionally engaged in medical activities and is obliged in accordance with the legislation of the Russian Federation to maintain a medical secret;
- the processing of personal data is necessary to establish or exercise the rights of the subject of personal data or third parties, as well as in connection with the administration of justice;
- the processing of personal data is carried out in accordance with the legislation on compulsory types of insurance, with insurance legislation.
- The processing of special categories of personal data should be immediately terminated if the reasons due to which they were processed are eliminated, unless otherwise provided by federal law.

The processing of personal data on criminal records can be carried out by the Operator only in cases and in the manner determined in accordance with federal laws.

2.6 Biometric Personal Data

Information that characterizes the physiological and biological characteristics of a person, on the basis of which it is possible to establish his identity - biometric personal data - can be processed by the Operator only with the consent in writing of the subject.

2.7 Ordering the processing of personal data to another person

The operator has the right to entrust the processing of personal data to another person with the consent of the subject of personal data, unless otherwise provided by federal law, on the basis of an agreement concluded with this person. The person who processes personal data on behalf of the Operator is obliged to comply with the principles and rules for processing personal data provided for by Federal Law 152.

2.8 Cross-border transfer of personal data

The operator is obliged to make sure that the foreign state, to whose territory it is supposed to transfer personal data, provides adequate protection of the rights of subjects of personal data, prior to the start of such transfer.

Cross-border transfer of personal data on the territory of foreign states that do not provide adequate protection of the rights of subjects of personal data may be carried out in the following cases:

- the consent of the subject of personal data in writing to the cross-border transfer of his personal data;
- the performance of a contract to which the personal data subject is a party.

3. Rights of the personal data subject

3.1 Consent of the subject of personal data to the processing of his personal data

The subject of personal data decides on the provision of his personal data and agrees to their processing freely, of his own free will and in his interest. Consent to the processing of personal data can be given by the subject of personal data or his representative in any form that allows to confirm the fact of its receipt, unless otherwise provided by federal law.

The Operator is responsible for providing proof of the consent of the subject of personal data to the processing of his personal data or proof of the existence of the grounds specified in the Federal Law-152.

3.2 Rights of the personal data subject

The subject of personal data has the right to receive information from the Operator regarding the processing of his personal data, if such a right is not limited in accordance with federal laws. The subject of personal data has the right to demand that the Operator clarify his personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as take measures provided for by law to protect their rights .

The processing of personal data in order to promote goods, works, services on the market by making direct contacts with a potential consumer using communication means, as well as for the purposes of political campaigning is allowed only with the prior consent of the subject of personal data. The specified processing of personal data is recognized as carried out without the prior consent of the subject of personal data, unless the Company proves that such consent was obtained.

The operator is obliged to immediately stop, at the request of the subject of personal data, the processing of his personal data for the above purposes.

It is forbidden to make decisions on the basis of solely automated processing of personal data that generate legal consequences in relation to the subject of personal data or otherwise affect his rights and legitimate interests, with the exception of cases provided for by federal laws, or with the consent in writing of the subject of personal data .

If the subject of personal data believes that the Operator is processing his personal data in violation of the requirements of FZ-152 or otherwise violates his rights and freedoms, the subject of personal data has the right to appeal against the actions or inaction of the Operator to the Authorized body for the protection of the rights of subjects of personal data or in court.

The subject of personal data has the right to protect his rights and legitimate interests, including compensation for damages and (or) compensation for moral damage in court.

4. Ensuring the security of personal data

The security of personal data processed by the Operator is ensured by the implementation of legal, organizational and technical measures necessary to meet the requirements of federal legislation in the field of personal data protection.

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

- appointment of officials responsible for organizing the processing and protection of personal data;
- limiting the list of persons with access to personal data;
- familiarization of subjects with the requirements of federal legislation and regulatory documents of the Operator on the processing and protection of personal data;
- organization of accounting, storage and circulation of information carriers;
- identification of threats to the security of personal data during their processing, formation of threat models on their basis;
- development of a personal data protection system based on the threat model;
- checking the readiness and effectiveness of using information security tools;
- differentiation of user access to information resources and software and hardware for information processing;
- registration and accounting of actions of users of information systems of personal data;
- using antivirus and personal data protection system recovery tools;
- use, where necessary, firewalling, intrusion detection, security analysis and cryptographic protection of information;
- organization of access control to the territory of the Operator, security of premises with technical means for processing personal data.

5. Final Provisions

Other rights and obligations of the Operator as an operator of personal data are determined by the legislation of the Russian Federation in the field of personal data.

Officials of the Operator guilty of violating the rules governing the processing and protection of personal data bear material, disciplinary, administrative, civil or criminal liability in the manner prescribed by federal laws.