

## **Policy of Plyterra, JSC on Personal Data Processing and Applicable Requirements for Personal Data Protection**

### **1. General provisions**

1.1. The Policy is developed based on the requirements of the Constitution of the Russian Federation, the Federal Law 'On Personal Data', the Federal Law 'On Information, Information Technologies and Information Protection', the Labor Code of the Russian Federation, and other statutory acts of the Russian Federation related to personal data protection.

1.2. The Policy determines the main issues related to personal data processed in Plyterra, JSC (hereinafter - the Company) and is applicable to all the personal data, which the Company receives or may receive from personal data subjects.

1.3. The Policy defines the position and intentions of the Company related to personal data processing and protection, in order to respect and protect the rights and freedoms of each person and, in particular, the privacy rights, personal and family secrets, the protection of one's name, honour and dignity.

1.4. Personal data is confidential, protected information which is subject to all requirements for the protection of confidential information, established by law and internal regulations of the Company.

1.5. Any personal data subject has access to the Policy.

The Policy applies to personal data received both before and after the Policy adoption.

1.6. In accordance with the current legislation of the Russian Federation, the Company functions as the Personal Data Operator. The Company, within its principal activity, processes personal data of various data subjects categories, either without application of automation technologies, or with them, including information and telecommunications networks - on the Company's website [www.plyterra.ru](http://www.plyterra.ru) (hereinafter - the Site), that links to the Policy.

### **2. Personal data definition and scope**

2.1. Personal data – is any information provided to the Company through the Site and/or collected, using the Site, related to directly or indirectly specified natural person (data subject).

2.2. The Company processes personal data of the following data subject categories:

- personal data of the Company's employees;
- personal data of candidates to fill vacant positions in the Company;
- personal data of subjects, who have signed contracts of civil legal nature;
- personal data of the client (potential client), partner, contractor (potential contractor), as well as personal data of the person in charge, participant (shareholder) or employee, other representatives of a legal entity, individual entrepreneur who is a client or contractor (potential client, partner, contractor) of the Company;
- personal data of the users registered on the Site of the Company.

### **3. Purposes and cases of personal data processing**

#### **3.1. Purposes of personal data processing are as follows:**

- search/application of persons/position for employment in the Company;
- providing potential consumers/purchasers with goods/services/works; sending them notifications regarding the provided goods/services/works, responses to their requests, information, including advertising, about the Company's events/goods/services/works

#### **3.2. Personal data is processed in the Company in the following cases:**

- if personal data is processed with consent of a data subject;
- if personal data processing is necessary for execution of the contract, a party, a beneficiary or a guarantor of which is a data subject, as well as if personal data processing is necessary for signing a contract at the initiative of a data subject, or a contract under which a data subject functions as a beneficiary or a guarantor;
- if processing of personal data is necessary to protect life, health or other vital interests of the personal data subject, if it is impossible to obtain data subject's consent;
- if processing of personal data is necessary to exercise the rights and legitimate interests of the Company or third parties, or to achieve socially significant purposes, on condition that the rights and freedoms of the personal data subject are not violated;
- if processing of personal data is necessary for scientific, literary or other creative activities, on condition that the rights and legitimate interests of the personal data subject are not violated;
- if processing of personal data is performed for research, statistical or other purposes, on condition that personal data shall be depersonalized compulsorily;
- if processing is performed in regards to the personal data, to which access of an unlimited number of persons is provided by the subject of personal data or at his request;
- if personal data, that is subject to publication or mandatory disclosure in accordance with the law, is processed.

3.3. The Company collects information through the Site in the following ways: personal data is provided by users (the Company collects personal data that has been entered in the data fields on the Company's website by users themselves or by other persons on their behalf); passive collection of personal data about the current connection in terms of statistical information.

The Company's website may collect statistical data about a user, including: visited pages; number of page visits; duration of the user session; entry points (third-party sites from which the user goes to the Company's sites, by clicking on the link); exit points (links on the Company's sites that the user clicks on to go to the third-party's sites); the user's country; the user's region; the user's provider; the user's browser; the user's system languages.

Data can be obtained using various methods, such as cookies and web beacons, etc. The Company can use third-party Internet services to organize the collection of statistical personal data, and third-party Internet services store the received data on their own servers. The Company is not responsible for the localization of servers of third-party Internet services. The Company does not compare the information, provided by the user independently and allowing to identify the subject of personal data, with statistical personal data obtained while using such passive methods of information collection.

#### **4. Basic principles of personal data processing**

4.1. Personal data processing must be performed on a legal and fair basis.

4.2. Personal data processing must be limited to the achievement of specific, predetermined and legitimate purposes. Personal data processing that is incompatible with the purposes of personal data collection is not allowed.

4.3. It is not allowed to combine databases containing personal data that are processed for purposes that are incompatible with each other.

Only personal data that meets the purposes of processing are subject to processing.

4.4. Content and volume of processed personal data must correspond to the stated purposes of processing. The personal data processed must not be excessive in relation to the stated purposes of its processing.

4.5. When personal data is processed, the accuracy of personal data, its sufficiency, and, if necessary, its relevance to the purposes of personal data processing must be ensured. The operator must take the necessary measures or ensure that they are taken to delete or clarify incomplete or inaccurate data.

4.6. Personal data storage must be performed in a form that allows to determine the subject of personal data, no longer than it is required by the purposes of personal data processing, unless the period for personal data storage is established by the Federal Law, or by the contract under which the personal data subject functions as a party, beneficiary or a guarantor. Processed personal data is subject to destruction or depersonalization as soon as the processing purposes have been reached or in case of loss of the need to achieve these purposes, unless otherwise is provided by the Federal Law.

#### **5. Measures to ensure the security of personal data**

5.1. In order to maintain its business reputation and ensure compliance with legal requirements, the Company considers ensuring the legitimacy of personal data processing in the Company's business processes and ensuring an appropriate level of protection of the personal data processed in the Company, to be the most important tasks.

5.2. The Company requires that other persons who have access to personal data do not disclose or distribute personal data to third parties without consent of the data subject, unless otherwise is provided by the Federal Law.

5.3. In order to ensure the security of personal data during its processing, the Company takes necessary and sufficient legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, as well as from destruction, modification, blocking, copying, provision, distribution and other illegal actions in relation to them.

5.4. The Company strives to ensure that all measures, aimed at organizational and technical protection of personal data, are carried out legally, in accordance with the requirements of legislative acts of the Russian Federation related to personal data processing.

5.5. In order to ensure adequate protection of personal data, the Company assesses the harm that may be caused to data subjects in case of violation of security of their personal data, and also determines current threats to the personal data security when they are processed in personal data information systems.

5.6. In accordance with the identified current threats, the Company takes necessary and sufficient legal, organizational and technical measures to ensure the security of personal data, including the use



of information security facilities, detection of unauthorized access to personal data, recovery of personal data, restriction of access to personal data, registration and accounting of actions with personal data, as well as monitoring and evaluating the effectiveness of the applied measures to ensure the security of personal data.

5.7. The Company destroys or depersonalizes personal data when the processing purposes have been achieved or when the processing purpose is no longer necessary.

5.8. The Company has appointed persons in charge for the processing and protection of personal data of data subjects.

## **6. Rights of personal data subjects**

The personal data subject is entitled for:

6.1. Receiving information on his/her personal data under processing, including information containing:

- confirmation of the fact of personal data processing by the Company;
- legal grounds and purposes of personal data processing;
- purposes and methods of personal data processing used by the Company;
- the name and location of the Company, information about persons (except for employees of the Company) who have access to personal data or who may have this data disclosed on the basis of a contract with the Company or on the basis of the Federal Law;
- processed personal data related to the relevant data subject, the source of its receipt, unless a different procedure for providing such data is stipulated by the Federal Law;
- terms of personal data processing, including the terms of its storage;
- the procedure for the data subject to exercise the rights stipulated by the Federal Law 'On Personal Data';
- information about the cross-border data transfer that has been carried out or is expected to be carried out;
- the name or surname, first name, patronymic name and address of the person in charge of personal data processing on behalf of the Company, if processing is entrusted or will be entrusted to such a person;
- other information provided by the Federal Law 'On Personal Data' or by other legislative acts.

6.2. Adjusting his/her personal data, data blocking or annihilation in case of personal data is incomplete, outdated, inaccurate, illegally obtained or inessential for processing purpose declared, as well as taking measures stipulated by the Law of the Russian Federation, to protect his/her rights;

6.3. Free access to his/her personal data, including the right to receive copies of any record containing personal data, except for cases stipulated by the legislation of the Russian Federation.

6.4. Revoking the consent given for personal data processing;

6.5. Appealing to court against the Company's action or inaction infringing the requirements of the Law of the Russian Federation related to personal data protection, as well as filing for compensation for losses or/and for moral harm in court;



6.6. Demanding the elimination of illegal actions of the Company in relation to his/her personal data.

6.7. The Company is not responsible for the unreliable information provided by the subject of personal data.

## **7. Obligations of the Company**

The Company is responsible for:

7.1. Taking necessary and sufficient legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, as well as from destruction, modification, blocking, copying, provision, distribution and other illegal actions in relation to it.

7.2. Implementing activities for organizational and technical protection of personal data in accordance with the requirements of the legislation of the Russian Federation related to personal data processing.

In order to ensure personal data protection, assessing the harm that may be caused to data subjects in case of violation of security of their personal data, and also determine current threats to the personal data security when it is processed in personal data information systems.

7.4. When identifying current threats, taking all the necessary and sufficient legal, organizational and technical measures to ensure the security of personal data, including:

- identification of security threats to the information, containing personal data, during its processing;
- taking organizational and technical measures to ensure the security of information, containing personal data, during its processing;
- assessment of the effectiveness of measures taken before putting personal data information system into operation;
- accounting of machine-readable media, that include personal data;
- detecting unauthorized access to information containing personal data and taking measures;
- recovery of personal data modified or destroyed due to unauthorized access to it;
- establishing rules of access to information containing personal data, ensuring registration and accounting of all actions performed with information containing personal data in the personal data information system;
- monitoring of the measures taken.

## **8. Obligations and responsibilities of the Company's employees**

8.1. Employees of the Company who are allowed to process personal data are obliged:

- to know and strictly comply with the requirements of this Policy;
- to process personal data only within their job duties;
- not to disclose personal data obtained as a result of performing their job duties as well as personal data that have become known to them due to the nature of their activities;
- to prevent actions of third parties that may lead to disclosure (destruction, distortion) of personal data;



- identify the facts of disclosure (destruction, distortion) of personal data and inform the line manager about it;
- keep secret information containing personal data in accordance with the by-laws of the Company.

8.2. Employees of the Company who are allowed to process personal data are prohibited from unauthorized and unregulated copying of personal data to any paper and electronic media that are not intended for storing personal data on.

8.3. Each new employee of the Company who directly processes personal data is subject to familiarization with the requirements of the legislation of the Russian Federation on the processing and protection of personal data, the Policy and other by-laws on the processing and protection of personal data and takes on the obligation to comply with them.

8.4. Persons guilty of violating the requirements of the legislation of the Russian Federation related to personal data are subject to disciplinary, material, civil legal, administrative or criminal liability.

## **9. Final provisions**

9.1. The Policy is an internal document of the Company which is publicly accessible and shall be posted on the official website of the Company.

9.2. The current version of the Policy in hard copy is stored in Plyterra, JSC at the address: 1 Leninskaya str., Umet, Zubovo-Polyansky district, Republic of Mordovia.

9.3. Control over the implementation of the requirements of the Policy is carried out by the person responsible for the Company's personal data processing organization.

9.4. The responsibility of the Company's employees, who process personal data and have the right to access it, for non-compliance with the requirements of the rules, stipulating the processing and protection of personal data, is established in accordance with the legislation of the Russian Federation and internal documents of the Company.

### **PLEASE NOTE THAT:**

To get clarification on issues of your personal data processing, please contact the Company in person or send an official request by post to the following address: 1 Leninskaya str., Umet, Zubovo-Polyansky district, Republic of Mordovia.

January 9, 2017