

# Personal data collection and processing policy

## 1. General Provisions

1.1. Policy regarding the processing of personal data (hereinafter - the Policy) aims to protect the rights and freedoms of individuals, whose personal data is handled by LLC "Cifra" (hereinafter - the Operator).

1.2. The policy is developed in accordance with paragraph 2 of Part 1 of Art. 18.1 of the Federal Law of July 27 2006 No. 152-ФЗ "On Personal Data" (hereinafter - the Federal Law "On Personal Data").

1.3. The policy contains information to be disclosed in accordance with Part 1 of Art. 14 Federal Law "On personal data", and is a public document.

## 2. Information about the operator

2.1. The operator conducts its activities at the address: 620137, Sverdlovsk Region, Yekaterinburg, st. Akademicheskaya, d. 11A, office 4.

2.3. Database of information containing personal data of citizens of Russia Federation, located at the address: 196084, St. Petersburg, st. Flower, d. 18, lit. A business-park "On Flower, 18", office 137, client@sweb.ru. Server Address: 77.222.61.225

## 3. Information on the processing of personal data

3.1. The operator processes personal data in a lawful and fair manner for fulfillment of the functions, powers and responsibilities entrusted by the legislation the exercise of the rights and legitimate interests of the Operator, Operator's employees and third parties individuals.

3.2. The operator receives personal data directly from the subjects of personal data.

3.3. Operator handles personal data automated and by manual methods using computer technology and without the use of such.

3.4. Actions for the processing of personal data include the collection, recording, systematization, accumulation, storage, refinement (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion and destruction.

3.5. Database of information containing personal data of citizens of Russia Federation, located on the territory of the Russian Federation.

## 4. Processing employee personal data

4.1. The Operator processes the personal data of the Operator's employees as part of legal relations regulated by the Labor Code of the Russian Federation from 30 December 2001 No. 197-Federal Law (hereinafter - the Labor Code of the Russian Federation), including Chapter 14 of the Labor Code of the Russian Federation concerning the protection personal data of employees.

4.2. The operator processes the personal data of employees in order to fulfill labor contracts, compliance with the laws of the Russian Federation, as well as with the aim of:

- keeping personnel records;
- keeping accounting records;
- carrying out the functions and duties assigned by the legislation of the Russian Federation on the Operator, including on the provision of personal data to the authorities: State Government, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, Federal Fund for Mandatory Medical Insurance, as well as other government agencies;
- complying with the standards and requirements for labor protection and personal safety of employees of LLC "Cifra", the preservation of property;
- controlling the quantity and quality of work performed;
- providing benefits and compensation provided by the legislation of the Russian Federation;
- opening personal bank accounts of employees of LLC "Cifra" for transfer wages;
- insuring under programs of voluntary medical insurance;
- transferring insurance premiums to non-state pension funds;
- providing access control to the territory of the Operator;
- organizing the training of employees of LLC "Cifra";
- publishing on the site, in internal directories, address books of the organization.

4.3. The operator does not make decisions that affect the interests of workers based on their personal data obtained electronically or exclusively in result of automated processing.

4.4. The operator protects the personal data of employees at their own expense in the procedure established by the Labor Code of the Russian Federation, the Federal Law "On Personal Data" and other federal by the laws.

- 4.5. The operator familiarizes the workers and their representatives with documents establishing the procedure for processing personal data of employees, as well as their rights and obligations in this area.
- 4.6. The operator allows access to personal data of employees only to personnel entitled to receive the data necessary for performing their functions.
- 4.7. The operator receives all the personal data from the workers themselves. If the data can only be obtained from a third party, the Operator notifies in advance about this their employees and receives his written consent. The operator informs the employee about the goals sources, methods of obtaining, as well as the nature of the data to be obtained and the consequences of the employee's refusal to give written consent to receive them.
- 4.8. The operator processes the personal data of employees with their written consent, provided for the duration of the employment contract.
- 4.9. The operator processes the personal data of employees during the term of validity of employment contract. The operator processes the personal data of the dismissed workers during the period established by paragraph 5 of Part 3 of Art. 24 parts of the first Tax Code of the Russian Federation of July 31, 1998, No. 146-Federal Law, Part 1 of Art. 29 of the Federal Law "On Accounting" dated December 6, 2011 No. 402-Federal Law and other regulatory legal acts.
- 4.10. The operator can handle special categories of personal data off workers (health information related to the issue of performance of labor functions by them on the basis of clause 2.3 of Part 2 of Art. 10 FZ "On personal data".
- 4.11. The operator does not process biometric personal data of employees.
- 4.12. The operator does not receive data on the membership of workers in public associations or their trade union activities, except as required by the Labor Code of the Russian Federation or other federal laws.
- 4.13. The operator processes the following personal data of employees:
- Full Name;
  - Type, series and number of the identity document;
  - The date of issuance of an identity document and information about the issuer body;
  - Year of birth;
  - Month of birth;
  - Date of Birth;
  - Place of Birth;
  - Address;
  - Contact phone number;
  - E-mail address;
  - Taxpayer Identification Number;
  - Number of the insurance certificate of the state pension insurance;
  - Family status;
  - Health status;
  - Nationality;
  - Education;
  - Profession;
  - Revenues;
  - Insurance premiums for OPS;
  - Insurance premiums for CHI;
  - Tax deductions;
  - Position;
  - Retirement;
  - Academic degree.
- 4.14. The operator does not communicate to the third party the personal data of the employee without his written consent, except when necessary to prevent a threat to life and health of an employee, as well as in other cases provided for by the Labor Code of the Russian Federation, the Federal Law "On personal data "or other federal laws.
- 4.15. The operator does not communicate personal data of an employee for commercial purposes without his written consent.
- 4.16. The operator transfers the personal data of the employees to their representatives in the order established by the Labor Code of the Russian Federation, the Federal Law "On Personal Data" and other federal laws, and restricts this information to only those data that are necessary for performance by representatives of their functions.
- 4.17. The operator warns the persons receiving the employee's personal data that these data may only be used for the purposes for which they are communicated, requires these persons confirm that this rule is observed.
- 4.18. In the manner prescribed by law, and in accordance with Art. 7 FZ "O personal data "to achieve the purposes of processing personal data and with the consent of Employees The operator provides personal data of employees or instructs them

processing to the following persons:

- Government bodies (FIU, FTS, FSS, etc.);
- Bank (in the framework of the salary project);
- Insurance company (as part of the LCA program).

4.19. An employee can get free access to information about him. personal data and the processing of this data. An employee can get a copy of any records containing his personal data, except as otherwise provided federal law.

4.20. An employee can access medical records reflecting his state of health, with the help of a medical professional of his choice.

4.21. An employee may identify a representative to protect his personal data.

4.22. An employee may request to exclude or correct their incorrect or incomplete personal data, as well as data processed in violation of the requirements of the LC RF, Federal Law "On personal data" or other federal law. At failure of the Operator he may exclude or correct the employee's personal data in writing form of his disagreement and justify such disagreement. Employee can supplement personal data of an estimated nature by a statement expressing its own point of view.

4.23. An employee may request to notify all persons who were previously informed of him incorrect or incomplete personal data, about all exceptions made in them, corrections or additions.

4.24. An employee may appeal to the court any wrongful acts or omissions. Operator in the processing and protection of his personal data.

## **5. Processing customer personal data**

5.1. The operator processes the personal data of clients in the framework of legal relations with Operator, regulated by part two of the Civil Code of the Russian Federation dated January 26, 1996 No. 14-Federal Law (hereinafter referred to as clients).

5.2. The operator processes the personal data of customers in order to comply legislation of the Russian Federation, as well as to:

- enter into and fulfill obligations under contracts with customers;
- carry out the activities stipulated by the constituent documents of LLC "Cifra";
- inform about new products, special promotions and offers;
- carry out the publication of scientific research;
- communication.

5.3. Operator handles personal data customers with their consent, provided for the duration of contracts concluded with them. In cases stipulated by the Federal Law "On Personal Data", consent is provided in written form. In other cases, consent is considered to be obtained at the conclusion of the contract or performing committed acts.

5.4. The operator processes the personal data of customers for periods of validity contracts made with them. The operator can process personal data customers after the expiration of the contracts concluded with them during the term, established by paragraph. 5 h. 3 Article. 24 parts of the first Tax Code, Part 1 of Art. 29 of the Federal Law "On Accounting" and other regulatory legal acts.

5.5. The operator processes the following personal customer data:

- Full Name;
- Type, series and number of the identity document;
- Date of issuance of identity document and information about issuing body;
- Year of birth;
- Month of birth;
- Date of Birth;
- Place of Birth;
- Contact phone number;
- E-mail address;
- Education;
- Profession;
- Position;
- Academic degree, title;
- Data on social benefits;
- Address;
- Retirement.

5.6. In order to achieve the purposes of processing personal data and with the consent of customers, the Operator provides personal data or requests their processing to the following persons:

- Hosting provider SpaceWeb LLC.

## **6. Information about the security of personal data**

6.1. The operator appoints the person responsible for organizing the processing of personal data. to fulfill the obligations stipulated by the Federal Law "On Personal Data" and normative legal acts adopted in accordance with it.

6.2. The operator applies a set of legal, organizational and technical measures to securing personal data to ensure confidentiality personal data and their protection from illegal actions:

- provides unlimited access to the Policy, a copy of which is located at location of the Operator, and can also be posted on the Operator's website (if it's available);
- in pursuance of the Policy, approves and activates the document "Regulations on personal data processing "(hereinafter - the Regulations) and other local acts;
- makes employees familiar with the provisions of the legislation on personal data, as well as Policy and Regulation;
- carries out the admission of employees to personal data processed in Operator's information system, as well as to their material media only for performance of job duties;
- sets the rules for access to personal data processed in information system of the Operator, as well as provides registration and accounting of all actions with them;
- makes an assessment of the harm that may be caused to the subjects of personal data in the event of a violation of the Federal Law "On Personal Data";
- identifies threats to the security of personal data when it is processed in Operator's information system;
- applies organizational and technical measures and uses remedies information required to achieve a specified level of security personal data;
- carries out the detection of facts of unauthorized access to personal response measures, including the restoration of personal data modified or destroyed due to unauthorized access to them;
- evaluates the effectiveness of security measures taken personal data prior to the commissioning of the Operator's information system;
- carries out internal control of compliance with the processing of personal data of the Federal Law "On personal data ", adopted in accordance with the regulatory legal acts, requirements for the protection of personal data, policies, regulations and other local acts including control over security measures taken personal data and their level of protection in the processing of information.

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

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

- to receive personal data related to this subject and information processing;
- to clarify, block or destroy his personal data in case they are incomplete, outdated, inaccurate, illegally obtained or not are necessary for the stated purpose of processing;
- withdrawal of consent given by him for the processing of personal data;
- to protect their rights and legitimate interests, including for damages and moral damages in court;
- to appeal the actions or omissions of the Operator to the authorized body on protection of the rights of subjects of personal data or in court.

7.2. To exercise their rights and legitimate interests, personal data subjects have the right to contact the Operator or send a request in person or with the help of representative. The request must contain the information specified in Part 3 of Art. 14 Federal Law "On personal data"