

POLICY OF ROSVEKSEL LIMITED LIABILITY COMPANY REGARDING PERSONAL DATA PROCESSING

1. GENERAL PROVISIONS

- 1.1. This Policy of the Rosveksel limited liability company regarding personal data processing (hereinafter – Policy) was developed in fulfillment of requirements of cl. 2 part 1 art. 18.1 of the Federal Law On Personal Data for the purposes of ensuring protection of rights and freedoms of man and citizen during processing of his personal data, including protection of rights to privacy, personal and family secret.
- 1.2. The Policy applies to all personal data that the Rosveksel limited liability company (hereinafter – Operator, RSV LLC) processes.
- 1.3. The Policy extends to relations in the field of personal data processing that arose with the Operator both before and after the approval of this Policy.
- 1.4. In fulfillment of requirements of the Law on Personal Data, this Policy is published in free access on the Operator's website <https://rsvx.ru/>.

2. BASIC CONCEPTS

- 2.1. Basic concepts used in the Policy:

Personal data – any information relating directly or indirectly to an identified or identifiable natural person (hereinafter – personal data subject);

Personal data operator (Operator) – RSV LLC, independently or jointly with other persons organizing and/or implementing Personal data processing, as well as determining the purposes of Personal data processing, the composition of Personal data subject to processing, actions (operations) performed with Personal data;

Personal data processing – any action (operation) or set of actions (operations) with Personal data performed using automation tools or without using them. Personal data processing includes:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- clarification (update, change);
- extraction;
- use;
- transfer (dissemination, provision, access);
- depersonalization;
- blocking;
- removal;
- destruction.

Automated personal data processing – processing of Personal data by means of computer technology tools;

Personal data dissemination – actions directed at disclosure of Personal data to an indefinite circle of persons;

Personal data provision – actions directed at disclosure of Personal data to a certain person or a certain circle of persons;

Personal data blocking – temporary termination of Personal data Processing (except for cases if it is necessary for Personal data clarification);

Personal data destruction – actions as a result of which it becomes impossible to restore 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;

Personal data depersonalization – actions as a result of which it becomes impossible without using additional information to determine the belonging of Personal data to a specific personal data subject;

Personal data information system – a set of Personal data contained in databases and information technologies and technical tools providing their processing.

3. RIGHTS AND OBLIGATIONS

- 3.1. The Operator has the right:
- independently determine the composition and list of measures necessary and sufficient for ensuring fulfillment of obligations provided by the Law on Personal Data and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Law on Personal Data or other federal laws;
 - entrust Personal data Processing to another person with the consent of the personal data subject, unless otherwise provided by federal law, on the basis of a contract concluded with this person. The person implementing Personal data Processing by order of the Operator is obliged to comply with principles and rules of Personal data Processing provided by the Law on Personal Data, comply with Personal data confidentiality, take necessary measures directed at ensuring fulfillment of obligations provided by the Law on Personal Data;
 - transfer Personal data to the address of third parties in case if such transfer is necessary for purposes provided by section 4 of this Policy;
 - in case of revocation by the personal data subject of consent for Personal data Processing, the Operator has the right to continue Personal data Processing without the subject's consent if grounds indicated in the Law on Personal Data exist.
- 3.2. **The Operator is obliged:**
- organize Personal data Processing in accordance with requirements of the Law on Personal Data;
 - respond to appeals and queries of personal data subjects and their legal representatives in accordance with requirements of the Law on Personal Data;
 - report to the authorized body for protection of rights of personal data subjects (Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor)) upon query of this body necessary information within 10 (ten) working days from the date of receipt of such query. This period can be extended but not more than by 5 (five) working days. It is necessary for the Operator to send a motivated notification to Roskomnadzor with indication of reasons for extension of the period for provision of the requested information;
 - in the order defined by the federal executive authority authorized in the field of security provision, ensure interaction with the state system for detection, prevention and elimination of consequences of computer attacks on information resources of the Russian Federation, including informing it about computer incidents that entailed unlawful transfer (provision, dissemination, access) of Personal data.
- 3.3. **The personal data subject has the right:**
- obtain information concerning processing of his Personal data, except for cases provided by federal laws. Information is provided to the personal data subject by the Operator in an accessible form, and it must not contain Personal data relating to other personal data subjects, except for cases when legal grounds for disclosure of such Personal data exist. The list of information and order for its receipt is established by the Law on Personal Data;
 - demand clarification of the Personal data from the Operator, their blocking or destruction in case if Personal data are incomplete, outdated, inaccurate, unlawfully obtained or are not necessary for the declared purpose of Personal data Processing, as well as take measures provided by law for protection of his rights;
 - give preliminary consent for Personal data Processing for purposes of promotion of goods, works and services on the market;
 - appeal to Roskomnadzor or in court order unlawful actions or inaction of the Operator during Processing of his personal data.
- 3.4. Control over fulfillment of requirements of this Policy is implemented by the authorized person responsible for organization of personal data processing at the Operator.
- 3.5. Liability for violation of requirements of the legislation of the Russian Federation and local regulatory acts of RSV LLC in the sphere of processing and protection of personal data is determined in accordance with the legislation of the Russian Federation.

4. PURPOSES OF PERSONAL DATA PROCESSING

- 4.1. Personal data processing is limited to reaching specific, predetermined and legal purposes. Personal data Processing incompatible with purposes of Personal data collection is not permitted.
- 4.2. Only Personal data that answer the purposes of their processing are subject to Processing.
- 4.3. Processing of personal data by the Operator is implemented for the following purposes:
 - implementation of its activity in accordance with the charter of RSV LLC, including conclusion and implementation of contracts with counterparties, fulfillment of obligations imposed on the Operator by current legislation, protection of rights and legal interests belonging to the Operator in mutual relations with third parties;
 - fulfillment of labor legislation in labor and other relations directly connected with it, including: assistance to employees in employment, receipt of education and promotion in service, attraction and selection of candidates for work at the Operator, provision of personal safety of employees, control of quantity and quality of work performed, provision of property preservation, keeping of personnel, accounting and tax records, filling in and transfer to authorized bodies of required forms of reporting, organization of registration for individual (personified) record of employees in systems of mandatory pension insurance and mandatory social insurance;
 - implementation of access control mode to objects where the Operator is located and/or which belong to the latter on any legal grounds (hereinafter – access control mode).
- 4.4. Processing of personal data of employees can be implemented exclusively for purposes of ensuring compliance with laws and other regulatory legal acts and implementation of labor contracts and other agreements concluded with employees.

5. LEGAL GROUNDS FOR PERSONAL DATA PROCESSING

- 5.1. The legal ground for Personal data Processing is a set of regulatory legal acts, in fulfillment of which and in accordance with which the Operator implements Personal data Processing, including:
 - Constitution of the Russian Federation;
 - Civil Code of the Russian Federation;
 - Labor Code of the Russian Federation;
 - Tax Code of the Russian Federation;
 - Federal Law dated 08.02.1998 No. 14-FL On Limited Liability Companies;
 - Federal Law dated 06.12.2011 No. 402-FL On Accounting;
 - Federal Law dated 15.12.2001 No. 167-FL On Mandatory Pension Insurance in the Russian Federation;
 - other regulatory legal acts regulating relations connected with the activity of the Operator.
- 5.2. The legal ground for Personal data Processing also are:
 - charter of RSV LLC;
 - contracts concluded between the Operator and personal data subjects;
 - consent of personal data subjects for Processing of their personal data.

6. VOLUME AND CATEGORIES OF PROCESSED PERSONAL DATA, CATEGORIES OF PERSONAL DATA SUBJECTS

- 6.1. The content and volume of processed Personal data must correspond to declared purposes of processing provided in section 4 of this Policy. Processed Personal data must not be excessive in relation to declared purposes of their processing.
- 6.2. The Operator can process Personal data of the following categories of personal data subjects:
 - 6.2.1. Candidates for employment at the Operator – for purposes of fulfillment of labor legislation in framework of labor and other relations directly connected with it, implementation of access control mode, creation of personnel reserve of the Operator:
 - surname, name, patronymic;
 - gender;
 - citizenship;
 - date and place of birth;
 - contact data;
 - information about education, work experience, qualification;
 - other personal data reported by candidates in resume and cover letters, or in relation to which the Personal data subject gave consent for Personal data Processing.

6.2.2. **Employees and former employees of the Operator** – for purposes of fulfillment of labor legislation in framework of labor and other relations directly connected with it, implementation of access control mode, creation of personnel reserve of the Operator, protection of rights and legal interests belonging to the Operator and personal data subjects in mutual relations with third parties:

- surname, name, patronymic;
- gender;
- citizenship;
- date and place of birth;
- image;
- passport data;
- registration address by place of residence;
- actual residence address;
- contact data (phone number, email address, etc.);
- individual tax payer number (TIN);
- insurance number of the individual personal account;
- information about education, qualification, professional training and advanced training;
- marital status, presence of children, kinship ties;
- information about labor activity, including presence of encouragements, awards and/or disciplinary penalties;
- marriage registration data;
- information about military record;
- information about alimony withholding;
- information about income from the previous place of work;
- other personal data provided by employees in accordance with requirements of labor legislation, or in relation to which the Personal data subject gave consent for Personal data Processing.

6.2.3. **Family members of employees of the Operator** – for purposes of fulfillment of labor legislation in framework of labor and other relations directly connected with it between the Operator and employees:

- surname, name, patronymic;
- degree of kinship;
- year of birth;
- other personal data provided by employees in accordance with requirements of labor legislation, or in relation to which the Personal data subject gave consent for Personal data Processing.

6.2.4. **Clients and counterparties of the Operator (natural persons)** – for purposes of implementation by the Operator of its activity in accordance with the charter of RSV LLC, implementation of access control mode, protection of rights and legal interests belonging to the Operator and personal data subjects in mutual relations with third parties:

- surname, name, patronymic;
- date and place of birth;
- passport data;
- registration address by place of residence;
- contact data (phone number, email address, etc.);
- held position;
- individual tax payer number (TIN);
- settlement account number;
- other personal data provided by clients and counterparties (natural persons), necessary for conclusion and implementation of contracts, or in relation to which the Personal data subject gave consent for Personal data Processing.

6.2.5. **Representatives (employees) of clients and counterparties of the Operator (legal entities)** - for purposes of implementation by the Operator of its activity in accordance with the charter of RSV LLC, implementation of access control mode, protection of rights and legal interests belonging to the Operator and personal data subjects in mutual relations with third parties:

- surname, name, patronymic;

- passport data;
 - contact data (phone number, email address, etc.);
 - held position;
 - other personal data provided by representatives (employees) of clients and counterparties, necessary for conclusion and implementation of contracts, or in relation to which the Personal data subject gave consent for Personal data Processing.
- 6.3. Processing by the Operator of biometric personal data (information that characterizes the physiological and biological characteristics of a person, on the basis of which his identity can be established) is implemented in accordance with the legislation of the Russian Federation. The ground for processing is the corresponding consent of personal data subjects, as well as other grounds directly provided by current legislation of the Russian Federation.
- 6.4. Processing of special categories of personal data concerning racial, national belonging, political views, religious or philosophical beliefs, state of health, intimate life is not implemented by the Operator, except for cases provided by the legislation of the Russian Federation.

7. PROCEDURE AND CONDITIONS FOR PERSONAL DATA PROCESSING

- 7.1. Personal data processing is implemented by the Operator in accordance with requirements of the legislation of the Russian Federation.
- 7.2. Personal data processing is implemented with the consent of personal data subjects for the processing of their personal data, as well as without such in cases provided by the legislation of the Russian Federation.
- 7.3. The Operator implements Personal data Processing for each purpose of their processing in the following ways:
- non-automated personal data processing;
 - automated personal data processing with transfer of obtained information by information and telecommunications networks or without it;
 - mixed personal data processing.
- 7.4. Employees of the Operator, whose official duties include Personal data Processing, are admitted to Personal data Processing.
- 7.5. Personal data processing for each purpose of processing, indicated in clause 4.3 of the Policy, is implemented by means of:
- obtaining Personal data in oral and written form directly from personal data subjects;
 - entering Personal data into journals, registers and information systems of the Operator;
 - using other ways of Personal data Processing.
- 7.6. The Operator has the right to transfer Personal data to third parties for reaching purposes indicated in section 4 of this Policy. Such third parties can in including include:
- persons participating in organization of payment acceptance from the personal data subject and implementation of payment operations (payment systems, providers of payment instruments, banks and other financial organizations, etc.);
 - persons who require personal data of the personal data subject for conclusion/implementation of a specific agreement or contract concluded with the personal data subject.
- 7.7. Transfer of Personal data to bodies of inquiry and investigation, to the Federal Tax Service of the Russian Federation, the Social Fund of Russia and other authorized bodies of executive authority and organizations is implemented in accordance with requirements of the legislation of the Russian Federation.
- 7.8. The Operator and other persons who obtained access to Personal data from the Operator are obliged not to disclose and not to disseminate Personal data without the consent of the personal data subject, unless otherwise provided by federal law.
- 7.9. The Operator takes necessary legal, organizational and technical measures for protection of Personal data from unlawful or accidental access to them, destruction, change, blocking, unauthorized actions, including:
- determines threats to Personal data security during their processing;
 - adopts local regulatory acts and other documents regulating relations in the sphere of Personal data Processing and protection;
 - appoints persons responsible for organization of Personal data Processing and provision of Personal data security in structural subdivisions and information systems of the Operator;

- creates necessary conditions for work with Personal data;
 - organizes accounting of documents containing Personal data;
 - organizes work with information systems in which Personal data are processed;
 - stores Personal data in conditions under which their preservation is ensured and unlawful access to them is excluded;
 - familiarizes employees of the Operator with provisions of the legislation on personal data and local acts of the Operator on issues of personal data processing, organizes training of employees of the Operator.
- 7.10. The Operator implements storage of Personal data in a form allowing to determine the personal data subject no longer than each purpose of Personal data Processing requires, unless the period for Personal data storage is established by federal law, contract.
- 7.11. Personal data on paper carriers are stored in **RSV LLC** during periods of storage of documents for which these periods are provided by legislation on archival matters in the Russian Federation (Federal Law dated 22.10.2004 No. 125-FL On Archival Matters in the Russian Federation, List of typical administrative archival documents produced in the process of activity of state bodies, bodies of local self-government and organizations, with indication of periods for their storage (appr. by Order of The Federal Archival Agency of the Russian Federation dated 20.12.2019 No. 236).
- 7.12. The period for storage of Personal data processed in Personal data Information systems corresponds to the period for storage of Personal data on paper carriers.
- 7.13. The Operator terminates Personal data Processing in the following cases:
- within 3 (three) working days from the date of discovery of the fact of unlawful Personal data Processing;
 - the purpose of Personal data Processing is reached;
 - the period of action expired or consent of the personal data subject for processing of specified data is revoked, when according to the Law on Personal Data processing of these data is permitted only with consent;
 - other cases provided by the legislation of the Russian Federation.
- 7.14. Upon reaching purposes of Personal data Processing, as well as in case of revocation by the personal data subject of consent for their processing, the Operator terminates processing of these data if:
- it is not otherwise provided by a contract, a party of which, a beneficiary or, a guarantor of which is the personal data subject;
 - the Operator does not have the right to implement Personal data Processing without the consent of the personal data subject on grounds provided by the Law on Personal Data or other federal laws;
 - it is not otherwise provided by another agreement between the Operator and the personal data subject.
- 7.15. The personal data subject has the right at any time to revoke his consent by means of sending a notification with the mark "Revocation of Consent for personal data processing":
- in simple written form to the legal address of the Operator;
 - in electronic form to the email address of the Operator indicated on the site <https://rsvx.ru/>.
- 7.16. Upon appeal of the personal data subject to the Operator with a demand to terminate Personal data Processing in a period not exceeding 10 (ten) working days from the date of receipt by the Operator of the corresponding demand, Personal data Processing terminates, except for cases provided by the Law on Personal Data. Specified period can be extended, but not more than by 5 (five) working days. For this, it is necessary for the Operator to send the personal data subject a motivated notification with indication of reasons for extension of the period.
- 7.17. During collection of Personal data, including Internet, the Operator ensures systematization, recording, accumulation, storage, clarification (update, change), extraction of Personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except for cases indicated in the Law on Personal Data.

8. UPDATE, CORRECTION, REMOVAL, DESTRUCTION OF PERSONAL DATA, ANSWERS TO SUBJECT QUERIES FOR ACCESS TO PERSONAL DATA

8.1. Confirmation of the fact of Personal data Processing by the Operator, legal grounds and purposes of Personal data Processing, as well as other information indicated in part 7 art. 14 of the Law on Personal Data, are provided by the Operator to the personal data subject or his representative within 10 (ten) working days from the moment of appeal or receipt of a query of the personal data subject or his representative. Specified period can be extended, but not more than by 5 (five) working days. For this, it is necessary for the Operator to send the personal data subject a motivated notification with indication of reasons for extension of the period for provision of the requested information. Personal data relating to other personal data subjects are not included in provided information, except for cases when legal grounds for disclosure of such Personal data exist.

The query must contain:

- number of the main document certifying the identity of the personal data subject or his representative, information about the date of issue of the specified document and the body that issued it;
- information confirming the participation of the personal data subject in relations with the Operator (contract number, date of contract conclusion and/or other information), or information otherwise confirming the fact of Personal data Processing by the Operator;
- signature of the personal data subject or his representative.

The query can be sent in the form of an electronic document and signed by an electronic signature in accordance with the legislation of the Russian Federation.

The Operator provides the information indicated in part 7 art. 14 of the Law on Personal Data to the personal data subject or his representative in the form in which the corresponding appeal or query was sent, unless otherwise indicated in the appeal or query.

If all necessary information is not reflected in the appeal (query) of the personal data subject in accordance with requirements of the Law on Personal Data or the subject does not possess rights of access to requested information, then a motivated refusal is sent to him.

The personal data subject's right to access his Personal data can be limited in accordance with part 8 art. 14 of the Law on Personal Data, including if the personal data subject's access to his Personal data violates rights and legal interests of third parties.

8.2. In case of discovery of inaccurate Personal data upon appeal of the personal data subject or his representative or upon their query or upon query of Roskomnadzor, the Operator implements Personal data Blocking relating to this personal data subject from the moment of such appeal or receipt of specified query for the period of check, if Personal data Blocking does not violate rights and legal interests of the personal data subject or third parties.

In case of confirmation of the fact of Personal data inaccuracy, the Operator on grounds of information provided by the Personal data subject or his representative or by Roskomnadzor, or other necessary documents clarifies Personal data within 7 (seven) working days from the day of provision of such information and removes Personal data Blocking.

8.3. In case of discovery of unlawful Personal data Processing, the Operator on grounds of appeal (query) of the personal data subject or his representative or Roskomnadzor implements blocking of unlawfully processed Personal data relating to this personal data subject from the moment of such appeal or receipt of query.

8.4. Upon discovery by the Operator, Roskomnadzor or other interested person of the fact of unlawful or accidental transfer (provision, dissemination) of Personal data (access to Personal data) that entailed violation of rights of personal data subjects, the Operator:

- within 24 (twenty-four) hours – notifies Roskomnadzor about the occurred incident, assumed reasons that entailed violation of rights of personal data subjects, assumed harm caused to rights of personal data subjects, and taken measures for elimination of incident consequences, and also provides interaction with Roskomnadzor on issues connected with the incident;
- within 72 (seventy-two) hours – notifies Roskomnadzor about results of the internal investigation of the discovered incident and provides information about persons, actions that became its reason (if available).

8.5. Procedure for Personal data destruction by the Operator.

8.5.1. Conditions and periods for Personal data destruction by the Operator:

- reaching the purpose of Personal data Processing or loss of necessity to reach this purpose – within 30 (thirty) days;

- reaching maximum periods for storage of documents containing Personal data – within 30 (thirty) days;
 - provision by the personal data subject (his representative) of confirmation of the fact that Personal data were obtained unlawfully or are not necessary for declared purpose of processing – within 7 (seven) working days;
 - revocation by the personal data subject of consent for Processing of his personal data, if their preservation for the purpose of their processing is no longer required – within 30 (thirty) days.
- 8.5.2. Upon reaching the purpose of Personal data Processing, as well as in case of revocation by the personal data subject of consent for their processing, Personal data are subject to destruction if:
- it is not otherwise provided by a contract, a party of which, a beneficiary or a guarantor of which is the personal data subject;
 - the Operator does not have the right to implement Processing without the consent of the personal data subject on grounds provided by the Law on Personal Data or other federal laws;
 - it is not otherwise provided by another agreement between the Operator and the personal data subject.
- 8.6. Destruction of personal data is implemented by a commission created by order of the general director of RSV LLC.
- 8.7. Methods of Personal data Destruction are established in local regulatory acts of the Operator.

9. INFORMATION ABOUT THE OPERATOR:

Rosveksel limited liability company

TIN: 2304087790

PSRN: 1262300019068

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