

PRIVACY POLICY OF DYADYA VANYA TRADING LIMITED LIABILITY COMPANY REGARDING THE PROCESSING OF PERSONAL DATA

1. General provisions and terms used in the policy

1.1. This document defines the policy of Dyadya Vanya Trading Limited Liability Company, Taxpayer Identification Number (TIN) 5027137160, Primary State Registration Number (PSRN) 1085027007801 dated June 23, 2008, address: 3 Ogurechnaya St., Lyubertsy, Moscow Region, 140014, Russia (hereinafter referred to as the “Operator”), regarding the processing of personal data and the implementation of personal data protection requirements (hereinafter referred to as the “Policy”) in accordance with the requirements of Article 18.1 of Federal Law No. 152-FZ dated July 27, 2006 “On Personal Data”.

1.2. The following basic terms are used in this Policy:

1.3. personal data – any information relating directly or indirectly to an identified or identifiable individual (personal data subject);

1.4. processing of personal data – any action (operation) or set of actions (operations) performed with or without the use of automation tools on personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, and destruction of personal data;

1.5. automated processing of personal data – processing of personal data using computer technology;

1.6. provision of personal data – actions aimed at disclosing personal data to a specific person or a specific group of persons;

1.7. blocking of personal data – temporary cessation of personal data processing (except where processing is necessary for clarification of personal data);

1.8. destruction of personal data – actions resulting in the impossibility of restoring the content of personal data in a personal data information system and/or resulting in the destruction of physical media containing personal data;

1.9. personal data information system – a set of personal data contained in databases, as well as information technologies and technical means ensuring their processing;

1.10. personal data subject – an individual to whom personal data directly or indirectly relates;

1.11. confidentiality of information – a mandatory requirement for a person who has gained access to certain information not to transfer such information to third parties without the consent of its owner;

1.12. mixed processing – processing carried out both with the use of automation tools and without the use of such tools;

1.13. website – the Operator’s official Internet resource intended for providing information, rendering services, and interacting with users on the Internet.

2. Principles of personal data processing by the operator

2.1. The Operator processes personal data of personal data subjects who are not in an employment relationship with the Operator, as well as personal data of the Operator’s employees where such employees are engaged within the framework of employment relations.

2.2. Personal data shall be processed on a lawful and fair basis

2.3. The processing of personal data shall be limited to the achievement of specific, predetermined, and lawful purposes. Processing of personal data incompatible with the purposes of personal data collection shall not be permitted.

2.4. The merging of databases containing personal data processed for purposes incompatible with one another shall not be permitted.

2.5. Only personal data that meets the purposes of its processing shall be processed. Processing of personal data incompatible with the purposes of personal data collection shall not be permitted.

2.6. The content and scope of the processed personal data shall correspond to the stated processing purposes and shall not be excessive in relation to the stated purposes of processing.

2.7. When processing personal data, the accuracy, sufficiency, and, where necessary, relevance of personal data in relation to the purposes of processing shall be ensured. Necessary measures shall be taken to delete or clarify incomplete or inaccurate data.

2.8. Personal data shall be stored in a form allowing identification of the personal data subject for no longer than required by the purposes of personal data processing, unless the storage period for personal data is established by federal law or by an agreement to which the personal data subject is a party, beneficiary, or guarantor.

2.9. Processed personal data shall be destroyed upon achievement of the processing purposes or in the event that the need to achieve such purposes ceases to exist, unless otherwise предусмотрено federal law.

2.10. When collecting personal data, including through the Internet information and telecommunications network, the Operator shall ensure the recording, systematization, accumulation, storage, clarification (updating, modification), and extraction of personal data of citizens of the Russian Federation using databases located within the territory of the Russian Federation.

2.11. The processing of personal data shall not be used for the purpose of causing property and/or moral harm to personal data subjects or creating obstacles to the exercise of their rights and freedoms.

3. Legal grounds for personal data processing

3.1. Personal data processing within the Company is carried out in accordance with Federal Law No. 152-FZ dated July 27, 2006 “On Personal Data” (hereinafter also referred to as the “Personal Data Law”), Article 53 of Federal Law of the Russian Federation No. 126-FZ dated July 7, 2003 “On Communications”, the Labor Code of the Russian Federation, Federal Law No. 402-FZ dated December 6, 2011 “On Accounting”, Federal Law No. 27-FZ dated April 1, 1996 “On Individual (Personalized) Accounting in the Mandatory Pension Insurance System”, Resolution of the Government of the Russian Federation No. 1119 dated November 1, 2012 “On Approval of Requirements for Personal Data Protection During Their Processing in Personal Data Information Systems”, Resolution of the Government of the Russian Federation No. 687 dated September 15, 2008 “On Approval of the Regulation on Peculiarities of Personal Data Processing Carried Out Without the Use of Automation Tools”, Federal Law No. 31-FZ dated February 26, 1997 “On Mobilization Preparation and Mobilization in the Russian Federation”; Federal Law No. 255-FZ dated December 29, 2006 “On Mandatory Social Insurance in Case of Temporary Disability and in Connection with Motherhood”; Federal Law No. 27-FZ dated April 1, 1996 “On Individual (Personalized) Accounting in the Mandatory Pension Insurance System”; Federal Law No. 326-FZ dated November 29, 2010 “On Mandatory Medical Insurance in the Russian Federation”; Federal Law No. 178-FZ dated July 17, 1999 “On State Social Assistance”; Federal Law No. 167-FZ dated December 15, 2001 “On Mandatory Pension Insurance in the Russian Federation”; Federal Law No. 165-FZ dated July 16, 1999 “On the Fundamentals of Mandatory Social Insurance”; Federal Law

No. 125-FZ dated July 24, 1998 “On Mandatory Social Insurance Against Industrial Accidents and Occupational Diseases”, Law of the Russian Federation No. 4015-I dated November 27, 1992 “On the Organization of Insurance Business in the Russian Federation”, Decree of the President of the Russian Federation No. 188 dated March 6, 1997 “On Approval of the List of Confidential Information”, the Company Charter, Federal Law No. 149-FZ dated July 27, 2006 “On Information, Information Technologies and Information Protection”, and other regulatory legal acts in the field of personal data protection.

3.2. The legal grounds for processing personal data are as follows:

3.2.1. Agreements concluded between the Operator and the personal data subject, as well as agreements under which the personal data subject is a beneficiary or guarantor, including for the purpose of concluding an agreement at the initiative of the personal data subject or an agreement under which the personal data subject will be a beneficiary or guarantor;

3.2.2. Consent of personal data subjects to the processing of personal data;

3.2.3. Protection of the rights and legitimate interests of the Operator and third parties, or achievement of socially significant purposes, provided that the rights and freedoms of the personal data subject are not violated;

3.2.4. Participation of the Operator in constitutional, civil, administrative, criminal, and arbitration court proceedings;

3.2.5. Achievement of purposes предусмотренных by an international treaty of the Russian Federation or by law for the exercise and fulfillment of functions, powers, and obligations imposed on the Operator by the legislation of the Russian Federation;

3.2.6. Processing of personal data necessary for the execution of a judicial act, an act of another authority or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;

3.2.7. Processing of personal data subject to publication or mandatory disclosure in accordance with federal law.

4. Purposes and categories of personal data processing

4.1. The Operator processes only such personal data as is necessary for the provision of services and for carrying out its activities, as well as for ensuring the rights and legitimate interests of third parties, provided that the rights of the personal data subject are not violated.

The purposes of personal data processing and the list of personal data processed by the Operator are specified in Appendix No. 1 to this Policy.

4.2. The Operator does not process special categories of personal data relating to racial or ethnic origin, political opinions, religious beliefs, or biometric personal data. Processing of employees' health-related information is carried out solely in accordance with the applicable legislation of the Russian Federation for the purposes of fulfilling employment, contractual, and other obligations.

4.3. Processing of other categories of personal data is carried out by the Operator subject to the following conditions:

- processing of personal data is necessary for achieving purposes provided for by an international treaty of the Russian Federation or by law, as well as for exercising and fulfilling functions, powers, and obligations imposed by the legislation of the Russian Federation;

- processing of personal data is carried out with the consent of the personal data subject to the processing of their personal data;

- processing of personal data is necessary for the performance of an agreement to which the personal data subject is a party, beneficiary, or guarantor, as well as for entering into an agreement at the initiative of the personal data subject or an agreement under which the personal data subject will be a beneficiary or guarantor. An agreement concluded with a personal data subject may not contain provisions restricting the rights and freedoms of the personal data subject, establishing cases of personal data processing of minors unless otherwise provided by the legislation of the Russian Federation, or provisions allowing the inaction of the personal data subject to be treated as a condition for concluding the agreement;

- processing of personal data is carried out in connection with the possible participation of a person in constitutional, civil, administrative, criminal, or arbitration court proceedings;

- processing of personal data is necessary for the execution of a judicial act, an act of another authority or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings.

5. Conditions for termination of personal data processing

5.1. The conditions for termination of personal data processing by the Operator may include:

- achievement of the purposes of personal data processing;
- expiration of the validity period of the consent to personal data processing or expiration of the agreement with the personal data subject;
- withdrawal by the personal data subject of consent to the processing of their personal data (in the absence of other legal grounds for processing);
- detection of unlawful processing of personal data;
- liquidation of the Operator.

6. Conditions for personal data processing

6.1. Personal data of personal data subjects shall be processed for the purpose of ensuring compliance with the laws and other regulatory legal acts of the Russian Federation, training of the Operator's employees who are personal data subjects, ensuring the personal safety of personal data subjects, monitoring the quantity and quality of work performed, and ensuring the protection of the Operator's property.

6.2. Personal data processing shall be carried out by the Operator with the consent of personal data subjects, both with the use of automation tools and without the use of such tools. Processing of personal data of subjects shall be carried out in accordance with this Policy, the legislation of the Russian Federation, as well as within the framework of agreements and terms governing the use of the specified third-party services.

6.3. All personal data should be obtained directly from the personal data subject or their authorized representative. If personal data can only be obtained from a third party, the personal data subject must be notified thereof in advance and their written consent must be obtained.

6.4. The Operator may use information systems and/or software products of third parties that ensure the collection, storage, and transfer of personal data in the interests of the Operator.

6.5. The Operator shall not provide or disclose information containing personal data of personal data subjects to third parties without the written consent of the personal data

subject, except where this is necessary to prevent a threat to life and health, as well as in cases established by the applicable legislation of the Russian Federation.

6.6. Upon a reasoned request from an authorized authority and exclusively within the framework of compliance with applicable legislation, the personal data of a personal data subject may be transferred without the subject's consent to:

- judicial authorities in connection with the administration of justice;
- federal security authorities;
- prosecution authorities;
- police authorities;
- other authorities and organizations in cases established by regulatory legal acts and industry standards mandatory for compliance.

6.7. The Operator shall maintain a Log of Personal Data Disclosed to Third Parties upon Requests, in which incoming requests are registered, information about the requesting person is recorded, the date of transfer of personal data is indicated, and the specific information transferred is documented.

6.8. In the event that consent to personal data processing is obtained from a representative of the personal data subject, the Operator shall verify the authority of such representative to provide consent on behalf of the personal data subject.

6.9. In the event that a personal data subject withdraws consent to the processing of personal data, the Operator shall have the right to continue processing personal data without the consent of the subject where grounds specified by applicable legislation exist.

6.10. Publication (dissemination) of personal data to an unlimited number of persons may be carried out only on the basis of separate consent of the personal data subject executed in accordance with the requirements established by law. If personal data subjects establish additional conditions and/or restrictions on the subsequent processing of personal data, the Operator shall comply with such conditions. Placement of personal data may be carried out in the Operator's official accounts on social networks, messaging platforms, and other Internet platforms used by the Operator to promote goods, works, and services, provided that the relevant consent of the personal data subject has been obtained.

6.11. It is prohibited to make decisions based solely on automated processing of personal data that produce legal consequences for the personal data subject or otherwise affect their rights and legitimate interests, except in cases provided for by federal legislation establishing measures to ensure compliance with the rights and legitimate

interests of the personal data subject or where written consent of the personal data subject has been obtained.

6.12. The Operator shall explain to the personal data subject the procedure for making decisions based solely on automated processing of their personal data and the possible legal consequences of such decisions, provide the opportunity to object to such decisions, and explain the procedure for protection by the personal data subject of their rights and legitimate interests.

6.13. The Operator shall review such objection within thirty days from the date of its receipt and notify the personal data subject of the results of the review.

6.14. In the event that a personal data subject withdraws consent to the processing of personal data, the Operator shall have the right to continue processing personal data without the consent of the subject where grounds specified by applicable legislation exist.

6.15. The Operator shall have the right to entrust the processing of personal data to third parties (processors) for the purposes specified in this Policy, provided that such persons comply with the requirements of the legislation of the Russian Federation on personal data. Processing of personal data by third parties shall be carried out on the basis of an agreement concluded with the Operator, which defines the list of actions (operations) to be performed with personal data, the purposes of processing, and establishes obligations to ensure the confidentiality and security of personal data.

6.16. Personal data processing shall be carried out by the Operator, as well as by other third parties engaged by the Operator for processing or to whom personal data is transferred for the purposes specified above in accordance with the legislation of the Russian Federation. Such third parties may include, in particular:

- the Operator's counterparties providing services related to the performance of agreements to which the personal data subject is a party or beneficiary, services for supporting the operation of information systems and payment systems used, as well as other services acquired by the Company for the purposes specified above;
- other affiliated persons of the Operator for the purposes of ensuring intra-group interaction.

6.17. The Operator undertakes to implement the necessary legal, organizational, and technical measures to protect received personal data against unlawful or accidental access, destruction, modification, blocking, copying, provision, dissemination of personal data, and other unlawful actions with respect to personal data, and to comply with the principles

and rules of personal data processing established by the Personal Data Law and other relevant regulatory acts.

6.18. Organization of personal data storage:

6.18.1. Processing, including storage, of personal data by the Operator shall be carried out no longer than required by the purposes of personal data processing.

6.18.2. Personal data shall be stored on physical (paper) media and in electronic form.

6.18.3. The right of access to specific personal data of subjects shall be granted to employees who require such access for the performance of their job duties and who have been granted the relevant authority and access rights to personal data in accordance with the Operator's internal regulatory document.

6.18.4. When organizing the storage of physical media containing personal data, conditions ensuring the security of personal data and preventing unauthorized access thereto shall be maintained.

6.18.5. Personal data may be stored for the period established by:

- an agreement to which the personal data subject is a party, beneficiary, or guarantor;
- the consent of the personal data subject;
- applicable legislation of the Russian Federation;
- the Operator's local regulatory act governing the procedure and retention periods for documents containing personal data.

6.19. The Operator shall organize the storage of personal data for the period established by legislation governing archival storage and other regulatory acts containing provisions on the storage of personal data.

6.20. Upon achievement of the purposes of personal data processing, as well as in the event of withdrawal of consent to processing, personal data shall be destroyed if:

- otherwise is not provided for by an agreement to which the personal data subject is a party, beneficiary, or guarantor, or by the legislation of the Russian Federation;
- the Operator is not entitled to continue processing without the consent of the personal data subject on the grounds provided for by Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data" or other federal laws.

6.21. Destruction of documents containing personal data shall be carried out by any method excluding the possibility of unauthorized persons becoming acquainted with the materials being destroyed and excluding the possibility of restoring their content. Following destruction, a personal data destruction act shall be prepared and an entry shall

be made in the electronic registration log within the personal data information system in accordance with the requirements established for documenting the destruction of personal data.

6.22. Specific features of personal data processing on the website:

6.22.1. During visits by personal data subjects to the Operator's website and use of its functionality, technical information may be collected using various technologies and methods, including "cookies" technology and the Yandex.Metrica web service, which allow monitoring of the website's performance and usage characteristics, as well as optimization of marketing activities on the Internet

6.22.2. The Operator may process information contained in cookies files. The Cookies Processing Policy is available on the Internet at <https://dyadya-vanya.ru/> and constitutes an integral part of this Policy.

6.22.3. The data processing period is limited to the validity period of cookies files and shall not exceed one year from the moment of visiting the website. Data processing shall cease upon deletion of cookies files from the Subject's browser.

6.22.4. The Subject may refuse the use of cookies by selecting the appropriate browser settings. In addition, to opt out of the processing of statistical data, the Subject may use the following tool: <https://yandex.ru/support/metrika/general/opt-out.html>. However, this may affect the operation of certain website functions. By using this website, the Subject agrees to the processing of data relating to them by Yandex and the Operator in the manner and for the purposes specified above

6.22.5. If the Subject does not agree to the processing of the specified information by the web service, the Subject should leave this website.

6.22.6. This Policy applies only to the Operator's website and does not control and shall not be responsible for third-party websites to which the website user may navigate via links available on the Operator's website. On such websites, other personal information may be collected or requested from the user, and other actions may be performed.

7. Confidentiality of personal data

7.1. Information relating to personal data that becomes known in connection with the implementation of employment relations, performance of obligations under civil law agreements to which the personal data subject is a party, and in connection with the provision of services by the Operator shall constitute confidential information and shall be protected in accordance with the applicable legislation of the Russian Federation.

7.2. Persons granted access to processed personal data have signed a non-disclosure obligation regarding confidential information and have been informed of possible disciplinary, administrative, civil, and criminal liability in the event of violation of the norms and requirements of the applicable legislation of the Russian Federation in the field of personal data protection.

7.3. Persons granted access to processed personal data shall not disclose personal data of a personal data subject to third parties without the written consent of such subject, except where this is necessary to prevent a threat to the life and health of the personal data subject, as well as in cases established by the legislation of the Russian Federation.

7.4. Persons granted access to personal data undertake not to disclose personal data for commercial purposes without the written consent of the personal data subject. Processing of personal data of personal data subjects for the purpose of promoting goods, works, and services on the market through direct contact with a potential consumer by means of communication shall be permitted only with the prior consent of the personal data subject.

8. Exercise of the rights of personal data subjects

8.1. A personal data subject shall have the right to obtain information relating to the processing of their personal data, including information containing:

- confirmation of the fact of personal data processing by the Operator;
- legal grounds and purposes for personal data processing;
- the purposes and methods of personal data processing used by the Operator;
- the name and location of the Operator, information about persons (except for employees of the Operator) who have access to personal data or to whom personal data may be disclosed on the basis of an agreement with the Operator or pursuant to federal law of the Russian Federation;
- processed personal data relating to the relevant personal data subject, the source of their receipt, unless another procedure for providing such data is established by Federal Law No. 152-FZ dated July 27, 2006 “On Personal Data” or another federal law of the Russian Federation;
- periods of personal data processing, including storage periods;
- the procedure for exercising by the personal data subject the rights provided for by the Personal Data Law;

- the name or surname, first name, patronymic, and address of the person processing personal data on behalf of the Operator, if processing has been or will be entrusted to such person;
- other information provided for by Federal Law No. 152-FZ dated July 27, 2006 “On Personal Data” or other federal laws of the Russian Federation.

8.2. A personal data subject shall have the right to require the Operator to clarify, block, or destroy their personal data if such personal data is incomplete, outdated, inaccurate, unlawfully obtained, or not necessary for the stated processing purpose, as well as to take measures provided by law to protect their rights.

8.3. A personal data subject shall have the right, including the right to withdraw consent to the processing of personal data, by sending a corresponding request to the Operator’s email address: info@ruspole.ru, or by any other method allowing reliable confirmation of receipt by the Operator. In the event of an electronic request, the Operator shall have the right to request additional information necessary to identify the personal data subject. Withdrawal of consent to the processing of personal data may be sent by the subject using a qualified electronic signature in accordance with Part 1 of Article 6 of Federal Law No. 63-FZ dated April 6, 2011 “On Electronic Signature”, or by sending a corresponding written application to the Operator’s postal address: Russia, 140014, Moscow Region, Lyuberetsky District, Lyubertsy, 3 Ogurechnaya St.

8.4. Upon receipt of a request from a personal data subject for information relating to the processing of personal data, the Operator undertakes to provide such information to the subject free of charge and in an accessible form within the period established by legislation.

8.5. The Operator shall block personal data for the period of an internal review in the event of detection of:

- unlawful processing of personal data;
- inaccurate personal data;
- impossibility of destroying personal data within the period established by legislation in the field of personal data or by local regulatory acts.

8.6. The Operator undertakes to cease processing and destroy personal data in the following cases:

- impossibility of ensuring lawful processing of personal data;
- achievement of the purposes of personal data processing;

- expiration of the validity period of consent to personal data processing or withdrawal of consent by the personal data subject;
- expiration of the established period for personal data processing;
- liquidation of the Operator.

8.7. If a personal data subject believes that the Operator processes their personal data in violation of the requirements of Federal Law No. 152-FZ dated July 27, 2006 “On Personal Data” or otherwise violates their rights and freedoms, the personal data subject shall have the right to appeal the actions or inaction of the Operator to the authority responsible for the protection of the rights of personal data subjects (the Federal Service for Supervision of Communications, Information Technology and Mass Media – Roskomnadzor) or through judicial proceedings.

8.8. A personal data subject shall have the right to protect their rights and legitimate interests, including compensation for damages and/or moral harm through judicial proceedings.

8.9. In the event of any questions or requests regarding the processing of personal data, the personal data subject may contact the Operator via email at info@ruspole.ru or send a written request to the Operator’s postal address: Russia, 140014, Moscow Region, Lyuberetsky District, Lyubertsy, 3 Ogurechnaya St.

9. Measures aimed at ensuring the operator’s compliance with the obligations provided for by Articles 18.1 and 19 of Federal Law № 152-FZ dated July 27, 2006 «On personal data»

9.1. The Operator shall implement all legal, organizational, and technical measures предусмотренные by applicable regulatory legal acts to ensure the security of personal data during their processing in the Operator’s personal data information systems.

9.2. When processing personal data, the Operator shall:

9.2.1. Appoint a person responsible for organizing personal data processing;

9.2.2. Adopt local regulatory acts defining the policy and issues related to personal data processing and protection;

9.2.3. Conduct regular scheduled and unscheduled internal audits and monitor compliance of personal data processing activities with applicable legislation;

9.2.4. Regularly assess the potential harm that may be caused to personal data subjects in the event of violation of their rights and legislative requirements;

9.2.5. Establish a procedure for access to information resources and maintain records of positions of the Operator's employees whose access to personal data processed both with and without the use of automation tools is necessary for the performance of official (employment) duties;

9.2.6. In cases provided for by the legislation of the Russian Federation, apply information security tools within the personal data protection system that have successfully passed the conformity assessment procedure established by law. Commissioning of new information systems shall be carried out only after completion of procedures for assessing the effectiveness of the implemented personal data security measures;

9.2.7. Maintain records of the categories and lists of personal data processed by the Operator, categories of personal data subjects whose personal data is processed, retention periods, and procedures for destruction of such personal data;

9.2.8. Maintain records of machine-readable media containing personal data and the Operator's information systems in which personal data is processed;

9.2.9. Determine the required level of protection for personal data processed in the Operator's personal data information systems and identify threats to the security of personal data during their processing within such systems.

9.3. Within the framework of the personal data protection system, the Operator shall implement:

9.3.1. Protection of premises where technical means of personal data information systems are located;

9.3.2. Equipment of the Operator's premises with lockable doors;

9.3.3. Application of necessary software and hardware protection tools, including access control and user activity logging tools, antivirus protection tools, backup systems, and firewalls;

9.3.4. Organizational measures to ensure personal data security, including procedures establishing rules for access to personal data, registration, and recording of all actions performed with personal data.\

9.4. When processing personal data without the use of automation tools, the requirements established by Resolution of the Government of the Russian Federation No. 687 dated September 15, 2008 "On Approval of the Regulation on Peculiarities of Personal Data Processing Carried Out Without the Use of Automation Tools" shall be complied with.

9.5. The Operator shall ensure that employees directly engaged in personal data processing are familiarized with the provisions of the legislation of the Russian Federation on personal data (including personal data protection requirements) and local acts relating to personal data processing. The Operator shall provide regular training to its employees and communicate to them the requirements of the legislation of the Russian Federation.

9.6. The Operator shall bear responsibility for violation of obligations relating to ensuring the security and confidentiality of personal data during processing in accordance with the legislation of the Russian Federation.

9.7. To ensure unrestricted access to the Operator's Policy regarding personal data processing and information on implemented personal data protection measures, the text of this Policy is published on the Operator's website <https://dyadya-vanya.ru> used for the promotion of goods, works, and services

9.8. The Operator shall have the right to amend this Policy without prior notice to personal data subjects. The current version of the Policy shall be posted on the Operator's website and shall enter into force from the moment of its publication.

10. Liability

10.1 Liability of the Operator's employees (if any) and officials having access to personal data for failure to comply with the requirements of regulations governing the processing and protection of personal data shall be determined in accordance with the applicable legislation of the Russian Federation and the Operator's internal regulatory documents.

Appendix № 1 to the Personal Data Processing Policy

Purpose 1	Human resources and accounting management
categories of personal data	surname; first name; patronymic; year of birth; month of birth; date of birth; place of birth; marital status; income; gender; e-mail address; residential address; details of identity document (series, number, date of issue, issuing authority); details contained in the birth certificate; bank card details; current account number; personal account number; profession; position; information regarding employment activity (including work experience; information regarding current employment specifying the name and settlement account of the organization); military duty status; military registration information; education details; leave information; health information.
categories of personal data subjects whose personal data is processed	employees, employees' relatives, former employees, counterparties, representatives of counterparties, beneficiaries under agreements.
list of actions performed with personal data	collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.
personal data processing and retention periods	until the achievement of the purposes of processing, or until the expiration of the validity period of the personal data subject's consent, or until such consent is withdrawn by the subject, unless otherwise provided for by federal law.
methods of personal data processing	mixed processing, with transfer via the internal network of the legal entity, and with transfer via the Internet.
procedure for destruction of personal data	determined in clauses 6.20–6.21 of this Policy.
Purpose 2	Ensuring compliance with the labor legislation of the Russian Federation
categories of personal data	surname; first name; patronymic; year of birth; month of birth; date of birth; marital status; gender; e-mail address; registration address; residential address; telephone number; SNILS (Insurance Number of Individual Ledger Account); TIN; citizenship; details of identity document (series, number, date of issue, issuing authority); profession; position; information regarding employment activity (including work experience; information regarding current employment specifying the name and settlement account of the organization); military duty status; military registration information; education details (including educational, scientific, and other institutions attended; education document number; field of study or specialty specified in the education document; qualification); series, number, and date of issue of professional development and retraining documents; personnel

	number; terms and conditions of the employment agreement; official salary amount; social benefits to which the employee is entitled under the legislation of the Russian Federation; total work experience; information regarding annual paid leave, educational leave, and unpaid leave; health information.
categories of personal data subjects whose personal data is processed	employees; employees' relatives; former employees.
list of actions performed with personal data	collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.
personal data processing and retention periods	until the achievement of the purposes of processing, or until the expiration of the validity period of the personal data subject's consent, or until such consent is withdrawn by the subject, unless otherwise provided for by federal law.
methods of personal data processing	mixed processing, with transfer via the internal network of the legal entity, and with transfer via the Internet.
procedure for destruction of personal data	determined in clauses 6.20–6.21 of this Policy.
Purpose 3	Ensuring compliance with the tax legislation of the Russian Federation
categories of personal data	surname; first name; patronymic; year of birth; month of birth; date of birth; place of birth; marital status; income; gender; e-mail address; residential address; registration address; telephone number; SNILS (Insurance Number of Individual Ledger Account); TIN; citizenship; details of identity document (series, number, date of issue, issuing authority); bank card details; current account number; personal account number; profession; position; information regarding employment activity (including work experience; information regarding current employment specifying the name and settlement account of the organization).
categories of personal data subjects whose personal data is processed	employees; employees' relatives; former employees; counterparties; representatives of counterparties.
list of actions performed with personal data	collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.
personal data processing and retention periods	until the achievement of the purposes of processing, or until the expiration of the validity period of the personal data subject's consent, or until such consent is withdrawn by the subject, unless otherwise provided for by federal law.
methods of personal data processing	mixed processing, with transfer via the internal network of the legal entity, and with transfer via the Internet.

procedure for destruction of personal data	determined in clauses 6.20–6.21 of this Policy.
Purpose 4	Ensuring compliance with the pension legislation of the Russian Federation
categories of personal data	surname; first name; patronymic; year of birth; month of birth; date of birth; place of birth; marital status; income; gender; e-mail address; residential address; registration address; telephone number; SNILS (Insurance Number of Individual Ledger Account); TIN; citizenship; details of identity document (series, number, date of issue, issuing authority); bank card details; current account number; personal account number; profession; position; information regarding employment activity (including work experience; information regarding current employment specifying the name and settlement account of the organization).
categories of personal data subjects whose personal data is processed	employees; employees' relatives; former employees; legal representatives.
list of actions performed with personal data	collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.
personal data processing and retention periods	until the achievement of the purposes of processing, or until the expiration of the validity period of the personal data subject's consent, or until such consent is withdrawn by the subject, unless otherwise provided for by federal law.
methods of personal data processing	mixed processing, with transfer via the internal network of the legal entity, and with transfer via the Internet.
procedure for destruction of personal data	determined in clauses 6.20–6.21 of this Policy.
Purpose 5	Ensuring compliance with the insurance legislation of the Russian Federation
categories of personal data	surname; first name; patronymic; year of birth; month of birth; date of birth; place of birth; marital status; gender; SNILS (Insurance Number of Individual Ledger Account); TIN; details of identity document (series, number, date of issue, issuing authority); profession; position; information regarding employment activity (including work experience; information regarding current employment specifying the name and settlement account of the organization); health information; other personal data (details of the certificate of temporary disability; reason for temporary disability; period of temporary disability).
categories of personal data subjects whose personal data is processed	employees; employees' relatives; former employees.

list of actions performed with personal data	collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.
personal data processing and retention periods	until the achievement of the purposes of processing, or until the expiration of the validity period of the personal data subject's consent, or until such consent is withdrawn by the subject, unless otherwise provided for by federal law.
methods of personal data processing	mixed processing, with transfer via the internal network of the legal entity, and with transfer via the Internet.
procedure for destruction of personal data	determined in clauses 6.20–6.21 of this Policy.
Purpose 6	Preparation, conclusion, and performance of civil law agreements
categories of personal data	surname; first name; patronymic; year of birth; month of birth; date of birth; place of birth; gender; e-mail address; registration address; telephone number; SNILS (Insurance Number of Individual Ledger Account); TIN; citizenship; details of identity document (series, number, date of issue, issuing authority); bank card details; current account number; personal account number.
categories of personal data subjects whose personal data is processed	counterparties; representatives of counterparties; beneficiaries under agreements.
list of actions performed with personal data	collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.
personal data processing and retention periods	until the achievement of the purposes of processing, or until the expiration of the validity period of the personal data subject's consent, or until such consent is withdrawn by the subject, unless otherwise provided for by federal law.
methods of personal data processing	mixed processing, with transfer via the internal network of the legal entity, and with transfer via the Internet.
procedure for destruction of personal data	determined in Clauses 6.20–6.21 of this Policy.
Purpose 7	Recruitment of personnel (job applicants) for vacant positions of the operator
categories of personal data	surname; first name; patronymic; year of birth; month of birth; date of birth; place of birth; e-mail address; registration address; residential address; telephone number; details of identity document (series, number, date of issue, issuing authority); profession; position; information regarding employment activity (including work experience; information regarding current employment specifying the name and settlement account of the organization); education details; TIN.
categories of personal data subjects whose personal data is	job applicants.

processed	
list of actions performed with personal data	collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.
personal data processing and retention periods	until the achievement of the purposes of processing, or until the expiration of the validity period of the personal data subject's consent, or until such consent is withdrawn by the subject, unless otherwise provided for by federal law.
methods of personal data processing	mixed processing, with transfer via the internal network of the legal entity, without transfer via the Internet.
procedure for destruction of personal data	determined in Clauses 6.20–6.21 of this Policy.
Purpose 8	Ensuring the continuous operation of the official website and its functions, as well as generating client statistics on the use of website sections
categories of personal data	information collected through analytics tools; requested Internet pages; information about the web browser; IP address; location data; technical characteristics of software and equipment; access time; cookies files.
categories of personal data subjects whose personal data is processed	website visitors.
list of actions performed with personal data	collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.
personal data processing and retention periods	until the achievement of the purposes of processing, or until the expiration of the validity period of the personal data subject's consent, or until such consent is withdrawn by the subject, unless otherwise provided for by federal law.
methods of personal data processing	automated processing, without transfer via the internal network of the legal entity, with transfer via the Internet.
procedure for destruction of personal data	determined in Clauses 6.20–6.21 of this Policy.
Purpose 9	Processing of client requests and feedback
categories of personal data	surname; first name; patronymic; e-mail address; telephone number; message content; region of residence.
categories of personal data subjects whose personal data is processed	website visitors; clients.
list of actions performed with personal data	collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.
personal data processing and	until the achievement of the purposes of processing, or until the expiration of the validity period of the personal data subject's consent,

retention periods	or until such consent is withdrawn by the subject, unless otherwise provided for by federal law.
methods of personal data processing	mixed processing, with transfer via the internal network of the legal entity, and with transfer via the Internet.
procedure for destruction of personal data	determined in Clauses 6.20–6.21 of this Policy.
Purpose 10	Promotion of the operator’s goods, works, and services on the internet, analysis of user activity on the website, and evaluation of advertising campaign effectiveness
categories of personal data	IP address; information regarding user actions on the website; cookies files; information about the user’s browser and device; user technical identifiers; information regarding the date and time of website visits; information regarding the source of referral to the website; information regarding viewed pages and actions performed on the website; data collected by web analytics services.
categories of personal data subjects whose personal data is processed	website visitors
list of actions performed with personal data	collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.
personal data processing and retention periods	until the achievement of the purposes of processing, or until the expiration of the validity period of the personal data subject’s consent, or until such consent is withdrawn by the subject, unless otherwise provided for by federal law.
methods of personal data processing	automated processing, without transfer via the internal network of the legal entity, with transfer via the Internet.
procedure for destruction of personal data	determined in Clauses 6.20–6.21 of this Policy.
Purpose 11	Interaction with counterparties (suppliers, delivery services, contractors)
categories of personal data	surname; first name; patronymic; e-mail address; telephone number; year of birth; month of birth; date of birth; place of birth; gender; registration address; citizenship; details of identity document (series, number, date of issue, issuing authority); bank card details; current account number; personal account number.
categories of personal data subjects whose personal data is processed	counterparties; representatives of counterparties.
list of actions performed with personal data	collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.

personal data processing and retention periods	until the achievement of the purposes of processing, or until the expiration of the validity period of the personal data subject's consent, or until such consent is withdrawn by the subject, unless otherwise provided for by federal law.
methods of personal data processing	mixed processing, with transfer via the internal network of the legal entity, and with transfer via the Internet.
procedure for destruction of personal data	determined in clauses 6.20–6.21 of this Policy.
Purpose 12	Ensuring the participation of the personal data subject in legal proceedings, as well as the enforcement of judicial acts and acts of other authorities and officials subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings
categories of personal data	surname; first name; patronymic; telephone number; e-mail address; residential address / delivery address; order information (order contents, cost, order date, status); payment information (fact of payment, payment method, amount, without storing full bank card details); correspondence with the personal data subject (requests, claims, responses); information contained in agreements, acts, delivery notes, and other primary documents; identity document details (in cases provided for by law or necessary for dispute resolution); other personal data provided by the personal data subject within the framework of a request, claim, or legal proceedings.
categories of personal data subjects whose personal data is processed	employees; employees' relatives; former employees; counterparties; representatives of counterparties; clients; legal representatives; beneficiaries under agreements.
list of actions performed with personal data	collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.
personal data processing and retention periods	until the achievement of the purposes of processing, or until the expiration of the validity period of the personal data subject's consent, or until such consent is withdrawn by the subject, unless otherwise provided for by federal law.
methods of personal data processing	смешанная, с передачей по внутренней сети юридического лица, с передачей по сети Интернет.
procedure for destruction of personal data	determined in clauses 6.20–6.21 of this Policy.
Purpose 13	Loyalty programs, promotions, and contests
categories of personal data	surname; first name; patronymic; telephone number; e-mail address; date of birth; city; photograph; participation identifier; prize information; information regarding the existence of the subject's account (profile) on social networks such as VKontakte, Facebook, Instagram, and others.
categories of personal data subjects whose	clients; website visitors.

personal data is processed	
list of actions performed with personal data	collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.
personal data processing and retention periods	until the achievement of the purposes of processing, or until the expiration of the validity period of the personal data subject's consent, or until such consent is withdrawn by the subject, unless otherwise provided for by federal law.
methods of personal data processing	mixed processing, with transfer via the internal network of the legal entity, and with transfer via the Internet.
procedure for destruction of personal data	determined in clauses 6.20–6.21 of this Policy.
Purpose 14	Organization of internal corporate electronic interaction and provision of employees with access to the operator's internal information resources
categories of personal data	surname; first name; patronymic; gender; e-mail address; telephone number; position; structural subdivision.
categories of personal data subjects whose personal data is processed	employees.
list of actions performed with personal data	collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.
personal data processing and retention periods	until the achievement of the purposes of processing, or until the expiration of the validity period of the personal data subject's consent, or until such consent is withdrawn by the subject, unless otherwise provided for by federal law.
methods of personal data processing	automated processing, with transfer via the internal network of the legal entity, and with transfer via the Internet.
procedure for destruction of personal data	determined in clauses 6.20–6.21 of this Policy.
Purpose 15	Organization of mandatory pre-employment, periodic, and pre-trip medical examinations for employees; ensuring compliance with labor legislation and occupational health and safety requirements; as well as making decisions regarding employees' fitness and authorization to perform their job duties..
categories of personal data	surname; first name; patronymic; gender; e-mail address; telephone number; position; structural subdivision; personnel number; workplace information; health information to the extent provided for by the legislation of the Russian Federation; information regarding medical examinations; conclusions of medical organizations regarding fitness/unfitness for work.
categories of personal data	employees; candidates.

subjects whose personal data is processed	
list of actions performed with personal data	collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), blocking, deletion, destruction.
personal data processing and retention periods	until the achievement of the purposes of processing, or until the expiration of the validity period of the personal data subject's consent, or until such consent is withdrawn by the subject, unless otherwise provided for by federal law.
methods of personal data processing	mixed processing, with transfer via the internal network of the legal entity, and with transfer via the Internet.
procedure for destruction of personal data	determined in clauses 6.20–6.21 of this Policy.