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Personal Data Processing Policy

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Table of Contents

1 Purpose and scope	4
2 Order of commissioning and review of this Policy	4
3 Terms and abbreviations	4
4 General provisions	5
5 Principles and purposes of personal data collection.....	5
6 Legal basis for the processing of personal data	5
7 Scope and categories of personal data processed, categories of personal data subjects	5
8 Ways and terms of processing personal data.....	6
9 Updating, modifications, deletion and destruction of personal data. Responses to requests from subjects for access to personal data	7
10 Responsibility	7

1. Purpose and scope of application

This Policy is a public document and is subject to publication on the external and internal information portals of the Company.

This Policy defines the requirements for the processing of personal data of the Company and applies to all structural divisions of the Company.

2. Procedure for the entry into force and revision of this Policy

This Policy is put into effect and canceled by the order of the General Director of the company.

This Policy should be reviewed and, if necessary, amended once every two years or in the event of changes in the categories of personal data processed, as well as in the event of incidents that may affect the process described in the Policy.

3. Terms and abbreviations

Term	Description
Automated processing of personal data	Processing of personal data using computer technology.
Blocking of personal data	Temporary termination of personal data processing.
Personal Data Information System	The totality of personal data contained in databases and information technologies and technical means that ensure their processing.
The company	JSC "Intervale"
Counterparty	legal entity or an individual entrepreneur, an individual with whom the Company has a contractual relationship.
Depersonalization	Actions, as a result of which it becomes impossible to determine the identity of personal data to a specific personal data subject without using additional information.
Processing of personal data	Any action (operation) or a set of actions (operations) with personal data performed with or without the use of automation tools and includes collection, recording, systematization, accumulation, storage, clarification, extraction, use, transfer, depersonalization, blocking, deletion, destruction.
Operator	A state body, a municipal body, a legal entity or an individual, independently or jointly with other persons, organizing and (or) carrying out the processing of personal data, determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.
Personal data	Any information related directly or indirectly to a specific or identifiable individual (the subject of personal data).
Provision of personal data	Actions aimed at disclosing personal data to an indefinite circle of persons.
Dissemination of personal data	Actions aimed at disclosing personal data to a certain person to a person or a certain circle of people.
Subject of personal data	A specific or identifiable individual.
Cross-border transfer of personal data	Transfer of personal data to the territory of a foreign state, to an authority of a foreign state, to a foreign individual or a foreign legal entity.
Destruction of personal data	Actions as a result of which it is impossible to restore the content of personal data in the personal data information system and (or) as a result of which the material carriers of personal data are destroyed.

4. General provisions

The Policy regarding the processing of personal data (hereinafter referred to as the Policy) defines the basic principles, goals, conditions and methods of processing personal data, lists of subjects and processed personal data, the functions of the Company in relation to the processing of personal data, the rights of personal data subjects.

5. Principles and purposes of personal data collection

The terms of personal data processing may not exceed the terms for achieving the goals of personal data processing, or the terms established by Federal Law, an agreement to which the personal data subject is a party, beneficiary or guarantor. The expiration of the consent of the personal data subject to the processing of his personal data, the withdrawal of the subject's consent to the processing of his personal data, the detection of illegal processing of personal data entails the termination of the right to processing of personal data before the expiration of the established deadlines, except for cases provided for by law

The processing of personal data is limited to the achievement of specific, predetermined and legitimate goals.

It is not allowed to combine databases containing personal data, processing which are carried out for purposes that are incompatible with each other.

The content and volume of the processed personal data corresponds to the stated processing purposes. Redundancy of personal data processing in relation to the stated goals is not allowed.

The processing of personal data in the Company is carried out for the following purposes:

- Regulation of labor relations with employees of the Company;
- Preparation, conclusion, execution and termination of contracts with counterparties and is limited to achieving predetermined, legitimate goals.

It is not allowed to process personal data that are incompatible with the purposes of collecting personal data.

6. Legal grounds for processing personal data

Federal Law No. 149-FZ of 27.07.2006 (as amended on 25.11.2017) "On Information, Information Technologies and Information Protection";

Labor Code of the Russian Federation

Decree of the Government of the Russian Federation No. 1119 of November 01, 2012 " On approval of Requirements for the Protection of Personal Data during their Processing in Personal Data Information Systems;

Resolution of the Government of the Russian Federation No. 687 of September 15, 2008 "On approval of the Regulations on the specifics of processing personal data carried out without automation tools";

Order of the FSTEC of Russia No. 21 dated February 18, 2013 "On approval of the Composition and content of organizational and Technical measures to ensure security personal data when they are processed in personal data information systems;

Roskomnadzor Order No. 996 of September 05, 2013 "On approval of requirements and methods for depersonalization of personal data".

Decree of the President of the Russian Federation No. 188 of March 6, 1997 "On approval of the list of confidential information"

7. Volume and categories of processed personal data, categories of personal data subjects

The content and volume of the processed personal data must correspond to the stated purposes of processing and comply with the requirements of legislative acts, internal regulatory acts (documents) and the terms of contracts with counterparties, provided that they fully comply with the legislation of the Russian Federation.

The categories of personal data subjects include:

employees and candidates for the vacant posts, (for these categories of citizens of the processed personal data containing name, date and place of birth, family status, passport data,

information about registration at the place of residence, TIN, SNILS, information about disability, data on labor activities, education information, information about business activities, information about the status of military service, status of financial obligations).

- Employees of contractors (and the contractors if they are physical persons or individual entrepreneurs), whose data have been submitted by contractors in the execution of concluded contracts, as well as in the framework of reference negotiation and preparation of contracts (for these categories of citizens processed personal data including name, date and place of birth, passport details, information about registration at the place of residence TIN, SNILS, information about business activity).

Other persons whose data were received by the Counterparties and transferred to the Company on the basis of current legislation or as part of the execution of the contract.

Other subjects of personal data (for the implementation of the processing purposes specified in section 5 of the Policy).

8. Procedure, methods and conditions of personal data processing

The list of actions performed by the operator with the personal data of subjects:

collection,
recording,
systematization,
storage,
refinement (update, change),
use,
transmission,
blocking,
removal,
destruction.

Methods of processing personal data:

- Automated processing of personal data;
- Processing without the use of automation tools

When processing and storing personal data, the Company uses databases and physical media located on the territory of the Russian Federation.

The personal data processed by the Company is subject to protection. The procedure for their protection is determined by the requirements of the relevant regulatory legal acts of the Russian Federation

Processing of personal data carried out without the use of automation means should be carried out in such a way that it is possible to determine the places of storage of personal data for each category of personal data (material carriers) and establish a list of persons who process personal data or have access to them.

The company provides separate storage of personal data (material carriers), the processing of which is carried out for various purposes.

The Company has the right to transfer personal data to the bodies of inquiry and investigation, to other authorized bodies on the basis provided for by the current legislation.

The Company has the right to transfer personal data to third parties provided that the personal data subjects consent to such transfer or if it is provided for by law, in cases where such transfer corresponds to the purposes of collecting personal data.

The transfer of personal data is necessarily accompanied by a notification to the receiving party about the confidentiality of the transmitted data and the need to comply with the legislation on the protection of personal data.

The transfer is made directly to the receiving party on a tangible medium or using electronic data transmission means, provided that secure means of information transmission are provided that allow to confirm receipt of data by a specific person and the fact of their delivery in integrity.

When storing material carriers, the conditions that ensure the security of personal data and excluding unauthorized access to them.

The list of measures necessary to ensure such conditions, the procedure for their adoption, as well as the list of persons responsible for the implementation of these measures, are established by the Company.

9. Updating, correction, deletion and destruction of personal data. Responses to requests from subjects for access to personal data.

Updating of personal data is carried out by the operator as soon as changes are received from the subjects of personal data, inaccuracies are detected. At the time of making changes, the processing of personal data of the subject must be temporarily stopped.

When the purposes of personal data processing are achieved, as well as in the event that the personal data subject withdraws consent to their processing, personal data is subject to destruction unless:

- otherwise provided for by the contract to which the personal data subject is a party, beneficiary or guarantor;
- the operator does not have the right to process personal data without the consent of the subject on the basis provided for by the Federal Law "On Personal Data";
- nothing else is specified by another agreement between the operator and the subject of personal data or by a legislative act.

Responses to requests/appeals of personal data subjects and their representatives of authorized bodies regarding inaccuracies of personal data, illegality of their processing, revocation of consent and access of the personal data subject to their data are determined by the Rules for Responding to requests.

10. Responsibility

Persons guilty of violating the requirements of Federal Law No. 152-FZ "On Personal Data" bear the responsibility provided for by the legislation of the Russian Federation.

Moral damage caused to the subject of personal data as a result of the violation of his rights violations of the rules of processing personal data established by the Federal law No. 152-FZ "On personal data", as well as requirements for the protection of personal data established by Federal law No. 152-FZ "On personal data", shall be reimbursed in accordance with the legislation of the Russian Federation.