

# **Policies of processing personal data of the subjects of the Limited Liability Company “UK “Industrialnyi Park Krasnodar”**

## **Document Purpose and Definition**

This document describes the policies for processing, accumulation and storing of documents containing information classified as personal data.

Design goal of these Policies is to ensure protection of the civil and political rights and freedoms of an individual during their personal data processing including the right to personal and family privacy, as well as to establish responsibility of the officials with access to the personal data for non-compliance of the regulation requirements to processing and protection of personal data.

## **Abbreviations, General Terms and Definitions**

**Personal Data (PD)** mean any information directly or indirectly relating to an identified or identifiable individual (data subject);

**Operator** means a state authority, a municipal authority, a legal entity or an individual which independently or jointly with other persons organizes and (or) performs processing of personal data as well as defines the goals of personal data processing, composition of personal data to be processed and operations with personal data;

**Personal Data Processing** means any operation or a series of operations with personal data made with or without any means of automation, including personal data collection, record, systematization, accumulation, storing, refinement (renewal, amendment), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, erasion;

**Automated Personal Data Processing** means any personal data processing with the help of the computer engineering means;

**Personal Data Distribution** means any operations aimed to disclosure of personal data to the public at large;

**Personal Data Provision** means any operations aimed to disclosure of personal data to a certain person or a certain group of persons;

**Personal Data Blocking** means any temporary suspension of the personal data processing (except where such processing is required for personal data refinement);

**Personal Data Erasion** means any operations resulting in impossibility to recover the personal data content in the personal data system and (or) resulting in destruction of material media bearing personal data;

**Personal Data Depersonalization** means any operations resulting in impossibility to define which data subject owns these personal data without use of additional information;

**Personal Data Information System** means any collection of the personal data in the databases as well as information technologies and hardware facilities ensuring processing of such data;

**Cross-Border Transfer of Personal Data** means any transfer of the personal data to the foreign territory to a foreign state authority, a foreign individual of a foreign legal entity.

**Information** means any data (messages, readings) regardless of their representation form.

## **Legal Reasons for Personal Data Processing**

These Policies are developed according to the following normative legal documents of the Russian Federation:

- 1) Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data dated January 28, 1981, with amendments approved by the Committee of Ministers on June 15, 1999, which is ratified by the Federal Law of the Russian Federation No.160-Φ3 dated 19.12.2005 “On Ratification of the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data” to the extent of the declarations that is defined by this Federal Law;
- 2) Constitution of the Russian Federation;
- 3) Civil Code of the Russian Federation;
- 4) Administrative Offenses Code of the Russian Federation;

- 5) Labor Code of the Russian Federation;
- 6) Criminal Code of the Russian Federation;
- 7) Federal Law No. 152-ФЗ dated 27.07.2006 “On Personal Data” (hereinafter – the Federal Law No. 152-ФЗ);
- 8) Federal Law No. 149-ФЗ dated 27.07.2006 “On Information, Information Technologies and Information Protection”;
- 9) List of confidential information approved by the Decree of the President of the Russian Federation No. 188 dated 06.03.1997;
- 10) Regulation on aspects of the personal data processing without any means of automation approved by the order of the Government of the Russian Federation No.687 dated 15.09.2008;
- 11) Security requirements to the personal data processing in the personal data information systems approved by the order of the Government of the Russian Federation No.1119 dated 01.11.2012.

“UK “Industrialnyi Park Krasnodar”, LLC, performs personal data processing on the legitimate and equitable basis. Legal reasons for personal data processing shall be the set of legal acts in pursuance of and in accordance with which “UK “Industrialnyi Park Krasnodar”, LLC, performs personal data processing, namely:

- Labor Code of the Russian Federation;
- Contracts made up between “UK “Industrialnyi Park Krasnodar”, LLC, and the data subjects;
- Contracts made up between “UK “Industrialnyi Park Krasnodar”, LLC, and other legal entities under which personal data processing is planned;
- Consent to personal data processing, etc.

### **Goals of Personal Data Collection and Processing at “UK “Industrialnyi Park Krasnodar”, LLC**

Goals of personal data processing are the following:

1. concluding of employment contracts with individuals;
2. performing its employer functions by a legal entity;
3. ensuring financial and economic activity of the company;

### **Processed Personal Data Scope and Categories, Data Subject Categories**

Content and scope of the processed personal data fully conforms to the goals of processing.

“UK “Industrialnyi Park Krasnodar”, LLC, performs collection and further processing of the following data subject categories:

- employed personnel;
- former employees;
- immediate family members of employees;
- job applicants;
- contractors.

### **Procedure and Terms of Personal Data Processing**

“UK “Industrialnyi Park Krasnodar”, LLC, receives all PD of the subjects directly from them or from their legal representatives.

Personal data processing is carried out in accordance with the current legislation of the Russian Federation based on the data subject's consent, except the cases provided for by the Federal Law No. 152-ФЗ. It is allowed that the form of a written consent of the subject matches the standard documents containing the subject's personal data (e.g., application forms, printed forms, etc.).

Personal data processing shall mean operations with the personal data, including:

- 1) data collection, storing, refinement (renewal, amendment);
- 2) data systematization, accumulation;
- 3) data use, distribution, transfer;
- 4) data depersonalization, blocking, erasion.

Data subject makes decision on personal data provision and gives consent to their processing at own will and for own benefit.

It is allowed that the form of a written consent of the subject matches the standard documents containing the subject's personal data (e.g., application forms, printed forms, etc.).

PD of the subjects of “UK “Industrialnyi Park Krasnodar”, LLC, are processed in the structural units in accordance with the performed functions.

Access to the PD processed without any means of automation shall be provided according to the approved list.

Access to the PD processed in the PD information systems (hereinafter – the PDIS) shall be provided according to the list approved pursuant to the procedure defined by “UK “Industrialnyi Park Krasnodar”, LLC.

Authorized persons cleared for access to the PD of the subjects of “UK “Industrialnyi Park Krasnodar”, LLC, are entitled to receive only those PD of the subject which are required for performing certain functions in accordance with the job description of the authorized persons.

PD processing performed without any means of automation shall be carried out in compliance with the requirements of the Regulation on aspects of the personal data processing without any means of automation approved by the order of the Government of the Russian Federation No.687 dated 15.09.2008.

When processed in such manner, PD shall be separated from the other information, in particular via their recording on separate material media bearing PD, in special sections or in the form of marginal notes (of printed forms).

Period of PD storing in the manner that allows identifying the data subject must not exceed the time period required by the goals of such PD processing.

PD must be erased or depersonalized in the following cases:

- 1) processing goals are achieved or there is no more necessity in reaching these goals;
- 2) receipt of the data subject's withdrawal of consent to PD processing;
- 3) Data subject or its legal representative provide data proving that the PD are obtained illegally or not necessary for the declared goal of processing;
- 4) reveal of wrongful PD processing in case of appeal from the data subject or its legal representative and inability to ensure lawful PD processing.

Material media bearing PD shall be stored in the specially fitted cabinets and safes. Storage locations shall be determined by the order on approval of storage locations for material media bearing PD issued by “UK “Industrialnyi Park Krasnodar”, LLC.

Within maximum 7 days after the data subject or its legal representative provides data proving that the PD are incomplete, inaccurate or irrelevant “UK “Industrialnyi Park Krasnodar”, LLC, shall make required amendments and notify the subject about such amendments.

PD Erasion shall be carried out within the period not exceeding 30 working days after achieving goals of PD processing, unless otherwise is stipulated by the laws of the Russian Federation.

PD Erasion shall be carried out within the period not exceeding 30 working days after the data subject's withdrawal of consent to PD processing.

PD Erasion shall be carried out within the period not exceeding 7 working days after the data subject or its legal representative provide data proving that the PD are obtained illegally or not necessary for the declared goal of processing.

Should any wrongful PD processing be revealed in case of appeal from the data subject or its legal representative and inability to ensure lawful PD processing, the procedure of PD erasion shall be carried out within the period not exceeding 10 working days after reveal of any wrongful PD processing. The person responsible for the PD processing organization shall make decision regarding the fact of wrongful PD processing and necessity of PD erasion and this person shall provide the corresponding information to the management. “UK “Industrialnyi Park Krasnodar”, LLC, shall notify the data subject or its legal representative on PD erasion.

PD Erasion shall be carried out by a commission composed of employees of the structural unit which processed PD of the subject and established necessity of PD Erasion, under control of the head of such structural

unit.

Destruction method for material media bearing PD shall be determined by the commission. The following methods are allowed:

- 1) burning;
- 2) shredding;
- 3) disposal to the special sites (landfills);
- 4) chemical treatment.

In any such case an act shall be drawn up and signed by the head of commission that carried out destruction of material media bearing personal data.

When it is necessary to carry out destruction of the large number of material media or apply special destruction methods, it is allowed to involve specialized organizations. In such case members of the PD erasion commission must be present during the procedure of material media bearing PD destruction. In any such case a delivery bill regarding transfer of material media bearing PD to be destructed to the specialized organization must be attached to an act of destruction.

Erasion of the fields in the databases of “UK “Industrialnyi Park Krasnodar”, LLC, shall be performed in the following cases:

- 1) processing goals are achieved or there is no more necessity in reaching these goals;
- 2) receipt of the data subject's withdrawal of consent to PD processing;
- 3) Data subject or its legal representative provide data proving that the PD are obtained illegally or not necessary for the declared goal of processing;
- 4) reveal of wrongful PD processing in case of application from the data subject or its legal representative and inability to ensure lawful PD processing.

Erasion shall be carried out by a commission composed of persons who are responsible for maintenance of automated systems and who own the databases.

Erasion shall be achieved via zapping of information on a data carrier (including reserve copies). In any such case an act shall be drawn up and approved by the person who is responsible for maintenance of automated systems and owns the databases.

It is not necessary to erase any electronic records archives and electronic interactions protocols if the corresponding regulatory and (or) contractual documents require their maintenance, safe-keeping and integrity during the specified time period.

If due to insufficient technical resources the erasion of PD in the databases is impossible it is allowed to carry out their depersonalization via rewriting the database fields. Rewriting shall be performed so that no data subject identification could be possible in the future.

The person responsible for the PD processing organization shall exercise control over fulfillment of PD erasion procedure.

“UK “Industrialnyi Park Krasnodar”, LLC, shall not process any biometric personal data.

Any decision giving rise to legal consequences for the data subject or otherwise affecting its rights and legitimate interests can be taken on the basis of only automated processing of its PD and only with express written consent of the data subject.

“UK “Industrialnyi Park Krasnodar”, LLC, shall ensure protection of the subjects' PD against unlawful use or loss at its own expenses and in the procedure established by the legislation of the Russian Federation.

During PD processing the necessary organizational and technical measures shall be taken to ensure confidentiality thereof.

In the process of personal data processing with any technical means the technical measures of protection shall be define according to:

1) Guidance Document of the Federal Service for Technical and Export Control of Russia (FSTEC) “Composition and content of organizational and technical measures ensuring personal data safety during their processing in the personal data information systems”. Document is approved by the Russian FSTEC Order No.21 dated 18.02.2013;

2) internal documents of “UK “Industrialnyi Park Krasnodar”, LLC, applied in the information security area.

Personal data protection allows for restricting access to them.

The local regulatory acts are approved by the Regulation of the General Director of “UK “Industrialnyi Park Krasnodar”, LLC, and shall be subject to execution, among them:

- documents defining the procedure of personal data processing;
- orders on approval of storage locations for material media bearing personal data;
- orders on defining list of persons performing personal data processing or having access to them;
- form of the subject consent to its personal data processing;
- documents defining procedures aimed to prevent and detect violations of the legislation of the Russian Federation, as well as remedial of such violation consequences;
- documents regulating the internal control procedure;
- documents aiming to estimation of damage that can be caused to the data subjects in case of violation of the federal laws related to personal data;
- procedure of access to the premises where personal data processing is performed;
- standard personal data non-disclosure agreement;
- standard form clarifying to a data subject the legal effects of refusal to provide their personal data;
- list of the personal data information systems.

“UK “Industrialnyi Park Krasnodar”, LLC, keeps its right to check completeness and accuracy of the provided personal data with express consent of the data subject. Should any inaccurate or incomplete personal data be detected, “UK “Industrialnyi Park Krasnodar”, LLC, is entitled to disconnect any and all relations with the data subject.

### **Procedure for Processing Appeals and Requests from the Subjects**

If the data subject or its legal representative appeals or provides written request for obtaining access to its personal data “UK “Industrialnyi Park Krasnodar”, LLC, follows requirements of the Articles 14, 18 and 20 of the Federal Law No. 152-Φ3.

“UK “Industrialnyi Park Krasnodar”, LLC, provides personal data access to the data subject or its legal representative only under control of the person responsible for PD processing organization in “UK “Industrialnyi Park Krasnodar”, LLC.

Any appeal of the data subject or its legal representative is recorded in the special log where all appeals from citizens (data subjects) regarding personal data processing are registered.

Written request from the data subject or its legal representative is recorded in the special log for registration of written appeals from individuals regarding obtaining access to their personal data.

Person responsible for the personal data processing organization makes decision whether to provide the subject with access to its personal data.

If the data provided by the subject are not sufficient for its identity verification, or if provision of personal data violates the civil and political rights and freedoms of other persons, the person responsible for the personal data processing organization prepares a sustainable response containing a reference to the regulation of the part 8, Article 14 of the Federal Law No. 152-Φ3 or another federal law, constituting grounds for such rejection, not later than thirty working days after the appeal of the data subject or its legal representative or from the date when such request from the data subject or its legal representative was received.

In order to provide the data subject or its legal representative with the access to the subject's personal data the person responsible for the personal data processing organization involves an employee(s) of the structural unit which performs processing of the subject's personal data upon consultation with the head of this structural unit.

“UK “Industrialnyi Park Krasnodar”, LLC, provides information regarding the personal data availability to the data subject in an accessible form, and such information must not include any personal data relating to the other data subjects. The person responsible for the personal data processing organization exercises control over

the procedure of information provision to the data subject or its legal representative.

Information regarding the personal data availability is provided to the subject in a request reply which must be given within thirty days from the date when such request from the data subject or its legal representative was received.

### **Procedure of Response to the Requests of Supervisory Authorities**

Following the part 4, Article 20 of the Federal Law No. 152-ФЗ, “UK “Industrialnyi Park Krasnodar”, LLC, notifies the authorized body for protection of the data subjects' rights, at request of this body, on the information necessary for carrying out its activities by the mentioned body within thirty days upon receipt of such request.

The person responsible for the personal data processing organization collects information required for preparing a sustainable response to the supervisory authorities' request, involving the employees of “UK “Industrialnyi Park Krasnodar”, LLC, if necessary.

The person responsible for the personal data processing organization within the legal time limit prepares and sends a sustainable response and other necessary document to the authorized body.