

## **1. General Provisions**

1.1. Acron's personal data processing policy ("Policy") was developed in line with Article 18.1 of the Federal Law No. 152-FZ *On Personal Data* dated 27 July 2006 ("the Federal Law") and contains information about the measures taken for personal data processing and protection.

1.2. The Policy was developed in line with the requirements of the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data, the Constitution of Russia, international treaties entered into by Russia, federal laws and other Russian regulatory legal acts related to personal data.

1.3. The purpose of this document is to inform personal data owners and other persons engaged in personal data processing that Acron ("Company" or "Operator") adheres to the fundamental principle that the processing of personal data must be conducted in a manner that is lawful, fair, relevant and not excessive in relation to the purpose for which data are processed.

1.4. One of the Company's priorities is the protection of the rights and freedoms of an individual as part of personal data processing, including protection of the rights to privacy, personal and family secrets.

1.5. The Policy applies to all personal data processed at the Company and constitutes a public document.

## **2. Legal Grounds for Personal Data Processing**

2.1. Subject to the processing purposes, the Operator processes personal data:

2.1.1. With the consent of personal data owners to their personal data processing

2.1.2. For the purpose of compliance with Russian laws, international treaties entered into by Russia, decrees by the Russian Government and other Russian regulatory legal acts

2.1.3. For the purpose of executing a court order or an order by any other authority or officer that is enforceable pursuant to Russian laws on enforcement proceedings

2.1.4. For the purpose of making or performance of an agreement whereto or whereunder the personal data owner is a party, beneficiary or guarantor, including where the Company exercises its right to cession of rights (claims) under such agreement.

## **3. Purposes and Applied Methods of Personal Data Processing**

3.1. Personal data are processed at the Company either using automated technologies, including information personal data systems, or without such technologies (mixed personal data processing).

3.2. Where the automated data processing method is used, personal data are transmitted via the Operator's internal network and via the Internet.

3.3. Personal data are processed for the following purposes:

3.3.1. Executing employment agreements and providing assistance to employees and candidates in employment, training and promotion; creating a talent pool, monitoring the quantity and quality of work performed, and complying with labour regulations and other legal acts containing labour regulations

3.3.2. Providing social benefits and guarantees and securing the personal safety or other vital interests of employees of the Company and of entities that are members of the same group as the Company on one or more grounds established by Article 9 of Federal Law No. 135-FZ *On Protection of Competition* dated 26 July 2006 ("Acron Group"), and members of their families

3.3.3. Making and performing civil law contracts, including service contracts, supply contracts with the Company and entities that are members of Acron Group

- 3.3.4. Complying with Russian laws on joint stock companies and information disclosure
- 3.3.5. Complying with antitrust laws
- 3.3.6. Complying with securities laws
- 3.3.7. Protecting the rights and legal interests of the Company, members of Acron Group and their officers in court, during dispute resolution and with administrative authorities
- 3.3.8. Preparing accounts or statutory applications, notifications or similar documents for submission to the Russian Pension Fund, Russian Social Insurance Fund, Federal Compulsory Medical Insurance Fund, Federal Tax Service and other state bodies and agencies
- 3.3.9. Consolidating statistical, analytical and accounting data and figures for Acron Group
- 3.3.10. Conducting inspections and audits of Acron Group members
- 3.3.11. Conducting bidding procedures provided for by the Company's bylaws
- 3.3.12. Preparing powers of attorney in favour of employees of the Company, members of Acron Group, other companies and individuals
- 3.3.13. Organising access and on-site control at guarded premises and facilities of the Company and ensuring property protection
- 3.3.14. Holding cultural, recreation and entertainment events for the Company's employees
- 3.3.15. Maintaining corporate databases of phone numbers and other information, publishing messages on in-house portals, recognition boards and in public personal data systems
- 3.3.16. Discharging other obligations in the context of the legal grounds specified in clause 2.1 hereof.

#### **4. Processed Personal Data and Data Sources**

4.1. Personal data are obtained by the Operator from public personal data sources or directly from the personal data owner or his/her representative, unless a different personal data acquisition procedure is provided for by an agreement with the personal data owner or by the Federal law.

4.2. Personal data may be accepted from a person other than the personal data owner, provided that the personal data owner agrees to submit his/her personal data to the Company for processing, unless a different personal data acquisition procedure is provided for by an agreement with the personal data owner or by the Federal law.

4.3. The Company will not process certain personal data categories (concerning racial or ethnic identity, political views, religious or philosophical beliefs, health status or sex life), except in cases provided for by the Federal law.

4.4. It is prohibited to use personal data for political solicitation or the promotion of goods, work and services, except in cases provided for by the Federal law.

4.5. The Company will process the following personal data: family name, first name, patronymic, gender, age; date of birth; place of birth; nationality; information about education (including the name of the educational institution, degree, qualification); marital status, family members; passport data (type of document, series and number of the document, issuing authority, date of issue); existence of foreign passport and its validity; address of registration and actual place of residence (place of residence); information about labour activity; military records; knowledge of foreign languages; academic degree; academic title; thesis date and topic, diploma; information on advanced training, professional retraining or practical training, supplementary education, awards / decorations; details on any disciplinary, material, civil, administrative or criminal liability; biographical data; personal and business qualities, hobbies; information about state pension insurance; individual insurance account number (SNILS),

taxpayer identification number; details of payments to the Federal Tax Service; payments to the Pension Fund of Russia; information about charges and deductions; business unit; place of work, occupied and part-time positions; details of the employment agreement; positions in management bodies of legal entities; work schedule; details of limited working ability, disability; details of tax deductions; information about vacation, business trips; social benefits; state of health, temporary disability leave details; additional skills; contact phone, image (photo) of a person, video image of the personal data owner, contact email addresses, including business email, contact phone numbers, including business numbers, fax, number and location of work space, work place, settlement account number and other personal data not prohibited by Russian law.

4.6. The Company processes personal data owned by:

4.6.1. The Company's employees and their relatives

4.6.2. Members of the Company's Board of Directors and their relatives, candidates to the Company's Board of Directors

4.6.3. Members of the Company's Internal Audit Team and their relatives, candidates to the Company's Internal Audit Team

4.6.4. Candidates considered for labour agreements

4.6.5. Persons whose personal data processing is related to the performance of agreements

4.6.6. Persons who are parties to labour agreements or civil law agreements with members of Acron Group

4.6.7. Persons who were previously employed by the Company

4.6.8. Prospective contractors (individuals)

4.6.9. Founders, management and representatives (individuals) of prospective contractors

4.6.10. Persons acting as sole executive bodies of Acron Group members

4.6.11. Shareholders and their relatives

4.6.12. Lawyers and notaries interacting with the Company

4.6.13. Authors of written applications to the Company

4.6.14. Other personal data owners (for the purpose of achieving the personal data processing purposes outlined in clause 3.3 hereof).

## **5. Personal Data Processing and Storage Period**

5.1. Personal data will not be processed before the legal grounds for personal data processing outlined in clause 2 hereof arise.

5.2. Personal data processing will be suspended as soon as processing purposes are achieved, legal grounds for data processing cease to exist, or the document storage period provided for by laws on archive-keeping in Russia and by Acron's bylaws expires.

5.3. Upon expiration of the processing period, personal data will either be destroyed or depersonalised for statistical or other research purposes.

## **6. Rights of Personal Data Owners**

6.1. The personal data owner is entitled to be informed about the processing of his/her personal data within the time period and according to the procedure provided for by the Federal law.

6.2. The personal data owner is entitled to require that the Operator update, block or delete his/her personal data if the data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the declared processing purpose; the data owner has the right to use the measures provided for by the Federal law to protect his/her rights.

6.3. A personal data owner's right to access his/her personal data may be restricted under the Federal law.

6.4. Decisions based solely on automated personal data processing that result in legal consequences for the personal data owner or otherwise affect his/her rights and legal interests may be made with the data owner's written consent.

6.5. A personal data owner has the right to challenge the Operator's actions or failure to act by filing an application to the authorised body for protection of personal data owners' rights or through the courts.

6.6. The personal data owner has the right to protection of his/her rights and legal interests, including the right to damages and/or compensation for moral injury through the courts.

## **7. Cross-Border Personal Data Transmission**

7.1. The Company engages in cross-border personal data transmission, which is defined as the transmission of personal data to a foreign country, a foreign regulatory authority, or a foreign private individual or legal entity.

7.2. Personal data may be transmitted across the borders of foreign countries that are Parties to the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data, as well as to other foreign countries that ensure proper protection of the rights of personal data owners (the list of these countries will be subject to approval by the authorised bodies for protection of personal data owner rights) without the personal data owner's written consent to cross-border transmission in view of the personal data processing purposes outlined in clause 3.3 hereof.

7.3. Personal data will only be transmitted across borders to the countries that are incapable of ensuring proper protection of personal data owner rights:

7.3.1. With the written consent of the personal data owner to cross-border transmission of his/her personal data

7.3.2. For the purpose of performing a contract to which the personal data owner is a party

7.3.3. To protect the life, health, other vital interests of the personal data owner or other persons, where it is impossible to obtain the written consent of the personal data owner

7.3.4. In the cases provided for by international treaties entered into by Russia, federal laws (should it be necessary to protect the constitutional system of Russia, ensure its national defence and security, ensure stable and smooth functioning of transportation infrastructure, or to protect personal, social and state interests associated with transportation from unlawful interference)

7.4. The countries to which the Operator may transmit the personal data, subject to the purposes and personal data categories, include: Austria, Azerbaijan, Belarus, Belgium, British Virgin Islands, Bulgaria, Hungary, Ghana, Germany, Greece, Georgia, Denmark, India, Iraq, Spain, Italy, Kazakhstan, Canada, Cyprus, Kyrgyzstan, China, Ivory Coast, Latvia, Lithuania, Republic of Macedonia, Republic of Moldova, the Netherlands, Norway, United Arab Emirates, Ukraine, Estonia, Poland, Portugal, Romania, Serbia, Slovakia, the United Kingdom of Great Britain and Northern Ireland, the United States of America, Turkey, Uzbekistan, Finland, France, Croatia, Montenegro, Czech Republic, Switzerland, Sweden, Japan.

## **8. Information about Third Parties Engaged in Personal Data Processing**

8.1. With the consent of the personal data owner, the Operator may delegate personal data processing to a third party, unless otherwise provided for by the Federal law, by virtue of the agreement concluded with such party.

8.2. The Operator's instruction (agreement) will specify the list of actions (operations) to be conducted with personal data by the person responsible for personal data processing, the processing purposes, the confidentiality obligations towards the personal data assumed by the respective person, as well as the obligations to protect the personal data as they are processed, and requirements to protect personal data that is already processed.

8.3. The person responsible for personal data processing under instruction from the Operator is not obligated to obtain the personal data owner's consent to processing of his/her personal data.

8.4. Should the Operator commission a third party with personal data processing, the Operator will be liable to the personal data owner for the third party's actions. The third party personal data processor will be liable to the Operator.

## **9. Information on Measures Taken to Protect Personal Data**

9.1. In the course of personal data processing the Operator will take the required legal, organisational and technical measures to protect personal data from unlawful or accidental access, destruction, alteration, blocking, copying, submission, sharing or other unlawful actions with regard to the personal data.

9.2. Personal data will be protected by the following means:

9.2.1. Appointing persons responsible for organising personal data processing and personal data safety

9.2.2. Issuing bylaws on personal data processing and protection focused on prevention and discovery of violations of Russian laws, elimination of consequences

9.2.3. Making a list of persons directly processing personal data

9.2.4. Providing training and methodological support and informing, against signature, the employees engaged in personal data processing of the fact of their participation in personal data processing, as well as of the rules for personal data processing and protection established by the regulatory legal acts of the executive bodies and the Company's bylaws

9.2.5. Registering physical personal data storage media and monitoring their use to prevent their loss, theft, substitution, unauthorised copying or destruction

9.2.6. Keeping records of personal data owners' applications and feedback

9.2.7. Transmitting personal data within the Company solely among those persons holding the positions on the list of positions that require processing personal data of persons occupying such positions

9.2.8. Placing personal data processing within a protected area and organising the physical protection of personal data storage media, locations and tools for their processing

9.2.9. Controlling access to the premises used for personal data processing and/or storage of physical data storage media

9.2.10. Identifying threats to the safety of personal data while they are processed within the information personal data systems and, if appropriate, developing a system to protect personal data while they are processed within the information personal data systems and setting access rules to personal data

9.2.11. Designing standard forms for personal data collection so that each personal data owner may review his/her personal data without infringing on the rights and legal interests of other personal data owners.

## **10. Liability for Violation of Personal Data Processing Rules and Requirements for Personal Data Protection**

Pursuant to applicable Russian laws, the Company's employees engaged in personal data processing will bear disciplinary, civil, administrative or criminal liability for violation of personal data processing rules and requirements for personal data protection.

## 11. Contact Information

11.1. Public Joint Stock Company Acron. TIN: 5321029508. Address: Veliky Novgorod 173012, Russia, tel.: +7 (8162) 99-61-09, fax: +7 (8162) 99-66-63, +7 (8162) 73-19-40, telex: 237133 ACRON RU, email: [root@vnov.acron.ru](mailto:root@vnov.acron.ru);

11.2. Registration number in the register of personal data operators (<http://rkn.gov.ru/personal-data/register/>): 53-18-001843.

11.3. Person responsible for personal data processing at PJSC Acron: Vladimir Kozlov, tel. +7 (816 2) 99-64-6, email: [vkozlov@vnov.acron.ru](mailto:vkozlov@vnov.acron.ru);

11.4. Agency authorized to protect the rights of personal data owners: Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor), Department for Protection of Personal Data Owner Rights.