



FBO SHEREMETYEVO
FBO PULKOVO

PERSONAL DATA PROCESSING POLICY

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1. General provisions

This Privacy Policy of JSC "A-Group" for Personal Data Processing (hereinafter referred to as "Policy") defines the basic principles and conditions for personal data processing at JSC "A-Group", as well as measures to ensure the security of personal data at JSC "A-Group".

This Policy has been developed in accordance with the requirements of Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data", other federal laws regulating personal data processing issues, as well as subordinate regulatory legal acts of the Russian Federation adopted for their implementation.

The Policy is aimed at ensuring the rights and freedoms of individuals and citizens when processing personal data at JSC "A-Group" (hereinafter referred to as "Operator"), including protection of rights to privacy of private life, personal and family secrets, in accordance with the requirements of current legislation of the Russian Federation.

The Policy is mandatory for implementation by all employees of JSC "A-Group" involved in the personal data processing.

2. Regulatory references

This Policy uses references to the following documents:

- Constitution of the Russian Federation dated December 12, 1993;
- Labor Code of the Russian Federation dated December 30, 2001 No. 197-FZ;
- Civil Code of the Russian Federation dated November 30, 1994 No. 51-FZ;
- Tax Code of the Russian Federation dated July 31, 1998 No. 146-FZ;
- Federal Law of the Russian Federation dated July 27, 2006 No. 149-FZ "On Information, Information Technologies and Information Protection";
- Federal Law of the Russian Federation dated July 27, 2006 No. 152-FZ "On Personal Data";
- Federal Law of the Russian Federation dated April 1, 1996 No. 27-FZ "On Individual (Personalized) Accounting in the Mandatory Pension Insurance System";
- Federal Law dated December 6, 2011 No. 402-FZ "On Accounting";
- Federal Law of the Russian Federation dated December 29, 2012 No. 273 "On Education in the Russian Federation";
- Federal Law dated October 22, 2004 No. 125-FZ "On Archival Affairs in the Russian Federation".

3. Terms and definitions

This policy uses the following fundamental terms and definitions:

Automated processing of personal data - processing of personal data using computing equipment;

Blocking of personal data - temporary cessation of personal data processing (except in cases where processing is necessary for clarification of personal data);

Personal Data Information System (PDIS) - a set of personal data contained in databases and information technologies and technical means ensuring their processing;

Depersonalization of personal data - actions as a result of which it becomes impossible to determine the ownership of personal data to a specific personal data subject without using additional information;

Processing of personal data - any action (operation) or set of actions (operations) performed using automation means or without their use. Personal data processing includes: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction;

Personal data operator - a state body, municipal body, legal entity or individual, independently or jointly with other persons organizing and (or) carrying out personal data processing, as well as determining the purposes of personal data processing, composition of personal data to be processed, actions (operations) performed with personal data;

Personal data (PD) - any information relating to a directly or indirectly identified or identifiable individual (personal data subject);

Provision of personal data - actions aimed at disclosing personal data to a specific person or a specific group of persons;

Distribution of personal data - actions aimed at disclosing personal data to an indefinite group of persons;

Cross-border transfer of personal data - transfer of personal data to the territory of a foreign state to a foreign state authority, foreign individual or foreign legal entity;

Destruction of personal data - actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which material carriers of personal data are destroyed.

4. Main provisions

4.1. Rights of personal data subject

4.1.1. Right of personal data subject to access their personal data

4.1.1.1. Right to receive information concerning the processing of their personal data, including containing:

- confirmation of the fact of personal data processing by the Operator;
- legal grounds and purposes of personal data processing;
- methods of personal data processing applied by the Operator;
- name and location of the Operator, information about persons (except for the operator's employees) who have access to personal data or to whom personal data may be disclosed based on an agreement with the Operator or based on federal law;
- processed personal data relating to the personal data subject, as well as their sources of receipt;
- terms of personal data processing and storage;
- procedure for exercising rights by personal data subject provided for by Federal Law No. 152-FZ "On Personal Data";
- information about completed or intended cross-border data transfer;
- name (surname, first name, patronymic) and address of the person processing personal data on behalf of the Operator, if processing is or will be entrusted to such person;
- other information provided for by federal laws of the Russian Federation.

4.1.1.2. Personal data subject has the right to receive information specified in clause 4.1.1.1, except in cases provided for in clause 4.1.1.7 of this Policy. Personal data subject has the right to demand from the Operator clarification of their personal data, their blocking or destruction if personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, as well as to take measures provided by law to protect their rights.

4.1.1.3. Information specified in clause 4.1.1.1 of this Policy is provided by the Operator:

- to the personal data subject in an accessible form, and it should not contain personal data relating to other personal data subjects, except in cases where there are legal grounds for disclosure of such personal data;
- to the personal data subject or their representative upon request or upon receipt of a request from the personal data subject or their representative.

The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation and must contain:

- number of the document certifying the identity of the personal data subject or their representative;
- information about the date of issue of the specified document and the body that issued it;
- information confirming the participation of the personal data subject in relations with the Operator (contract details, conditional verbal designation and/or other information);
- information otherwise confirming the fact of personal data processing by the Operator;
- signature of the personal data subject or their representative.

4.1.1.4. In case the information specified in clause 4.1.1.1 of this Policy was previously provided for review to the personal data subject upon their request, the right to a repeated request for obtaining the above information arises no earlier than 30 (thirty) calendar days after the initial request and/or sending the initial request (unless other terms are established by federal laws of the Russian Federation and regulatory legal acts adopted in accordance with them or an agreement to which the personal data subject is a party or

beneficiary/guarantor).

4.1.1.5. Personal data subject has the right to contact the Operator again or send a repeated request (with justification) to obtain information specified in clause 4.1.1.1 of this Policy, as well as to review processed personal data before the expiration of the term specified in clause 4.1.1.4 of this Policy, if such information and/or processed personal data were not provided to them for review in full based on the results of consideration of the initial request.

4.1.1.6. The Operator has the right to refuse (with justification) the personal data subject in fulfilling a repeated request that does not comply with the conditions provided for by the provisions of this Policy.

4.1.1.7. The right of personal data subject *to access their personal data may be limited* in accordance with federal laws of the Russian Federation, including if personal data processing:

- including personal data obtained as a result of operational-search, counterintelligence and intelligence activities, *is carried out for the purposes of national defense, state security and law enforcement*;

- *is carried out by bodies that detained the personal data subject on suspicion of committing a crime, or brought charges against the personal data subject in a criminal case, or applied a preventive measure to the personal data subject before bringing charges*, except for cases provided for by criminal procedural legislation of the Russian Federation, if it is allowed to familiarize the suspect or accused with such personal data;

- *is carried out in accordance with legislation on combating money laundering and terrorist financing*;

- *is carried out in cases provided for by legislation of the Russian Federation on transport security*, in order to ensure stable and safe functioning of the transport complex, protection of interests of individuals, society and the state in the sphere of transport complex from acts of unlawful interference.

Access of personal data subject to their personal data is always limited if it violates the rights and legitimate interests of third parties.

4.1.2. Rights of personal data subjects in processing their personal data for product, work, service promotion purposes

4.1.2.1. Processing of personal data for the purpose of promoting goods, works, services in the market by making direct contacts with potential consumers using communication means is allowed only with the prior consent of the personal data subject. Such processing of personal data is recognized as carried out without prior consent of the personal data subject if the Operator does not prove that such consent was obtained.

4.1.2.2. At the request of the personal data subject, the Operator immediately ceases processing their personal data.

4.1.3. Rights of personal data subjects in decision-making based solely on automated processing of their personal data

4.1.3.1. 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 in clause 4.1.3.2 of this Policy.

4.1.3.2. A decision that produces legal consequences for the personal data subject or otherwise affects their rights and legitimate interests may be made based solely on automated processing of their personal data only with written consent of the personal data subject or in cases provided for by federal laws, which also establish measures to ensure compliance with the rights and legitimate interests of the personal data subject.

4.1.3.3. The Operator explains to the personal data subject the procedure for making decisions based solely on automated processing of their personal data and possible legal consequences of such decision, provides the opportunity to object to such decision, and explains the procedure for protecting the personal data subject's rights and legitimate interests.

4.1.3.4. The Operator considers the objection specified in clause 4.1.3.3 of this Policy within thirty days from the date of its receipt and notifies the personal data subject of the results of consideration of such objection.

4.1.4. Right to appeal actions or inaction of the Operator

4.1.4.1. If the personal data subject believes that the Operator processes their personal data in violation of Russian Federation legislation or otherwise violates their rights and freedoms, the personal data subject has the right to appeal the actions or inaction of the Operator to authorized bodies for protection of personal data subjects' rights or in court.

4.2. Operator's obligations

4.2.1. Operator's obligations in personal data collection

4.2.1.1. When collecting personal data, the operator provides the personal data subject, upon their request, with information provided for in clause 4.1.1.1 of this Policy.

4.2.1.2. If provision of personal data is mandatory in accordance with Russian Federation legislation, the Operator explains to the personal data subject the legal consequences of refusing to provide their personal data.

4.2.1.3. If personal data are obtained not from the personal data subject, the Operator, except in cases provided for in clause 4.2.1.4 of this Policy, before beginning processing of such personal data provides the personal data subject with the following information:

- name (surname, first name, patronymic) and address of the Operator or their representative;
- purpose of personal data processing and its legal basis;
- intended users of personal data;
- rights of personal data subject established by Russian Federation legislation;
- source of personal data receipt.

4.2.1.4. The Operator is released from the obligation to provide the personal data subject with information provided for in clause 4.2.1.3 of this Policy in cases if:

- personal data subject is properly notified about processing of their personal data;
- personal data are obtained by the operator based on Russian Federation legislation or in connection with performance of an agreement to which the personal data subject is a party or beneficiary/guarantor;
- personal data are made publicly available by the personal data subject or obtained from a publicly available source;
- Operator processes personal data for statistical or other research purposes, or scientific or other creative activities, if this does not violate the rights and legitimate interests of the personal data subject;
- providing the personal data subject with information provided for in clause 4.2.1.3 of this Policy violates the rights and legitimate interests of third parties.

4.2.1.5. When collecting personal data, including through the Internet, the operator ensures recording, systematization, accumulation, storage, clarification (updating, modification), extraction of personal data of Russian Federation citizens using databases located on the territory of the Russian Federation, except in cases provided for by Federal Law No. 152 "On Personal Data".

5. Purposes of personal data processing

5.1. Processing of personal data must be limited to achieving specific, predetermined and lawful purposes. Processing of personal data incompatible with the purposes of personal data collection is not allowed.

5.2. Purposes of personal data processing may arise from, including:

- analysis of legal acts regulating the Operator's activities;
- purposes of activities actually carried out by the Operator, as well as activities provided for by the Operator's constituent documents;
- specific business processes of the Operator in specific PDIS (by structural divisions of the Operator and their procedures regarding certain categories of personal data subjects).

5.3. Personal data processing is carried out by the Operator for the purposes of:

- maintaining personnel, accounting, tax and military records;
- making management and personnel decisions, employee adaptation, monitoring their work discipline;
- paying wages, bonuses and other payments included in the Operator's remuneration system;

- providing employees with guarantees and compensation, as well as mandatory social insurance and tax deductions;
- providing employees and their family members with additional guarantees and compensation, including voluntary medical insurance and other types of social security;
- organizing business trips, assignments, training, professional development, professional retraining, instruction and knowledge testing;
- ensuring occupational health and safety, industrial safety, fire safety, conducting special workplace assessment, identifying health disorders and medical contraindications to work, conducting medical examinations and medical certifications, investigating, recording and reporting accidents;
- ensuring communication between employees and other persons, communicating employee personal data for commercial purposes, manufacturing and issuing business cards, providing work uniforms, operating and using company vehicles;
- protecting life and health of individuals, property and real estate from unlawful encroachments, ensuring internal facility and access control regimes at the operator's real estate facilities;
- carrying out administrative and economic activities by the operator;
- operating and using information technology infrastructure, providing corporate mobile radio communication service and corporate Internet access, technical user support, ensuring information protection;
- carrying out entrepreneurial activities and making transactions in accordance with the operator's Charter;
- concluding any agreements with personal data subjects and their subsequent performance;
- providing personal data subjects with information about services provided by the operator, about new products and services;
- actual implementation of activities provided for by the constituent document, acquisition and use of counterparty products, conducting settlements with counterparties, quality control and improvement of own products, consideration of incoming appeals of any nature, implementation and quality control of information and organizational interaction with counterparties and other persons, ensuring transparency of the operator's activities for shareholders, investors and other interested parties;
- regulating labor and other relations directly related to them;
- preparation, issuance, termination, storage of powers of attorney, including for preparation and storage of powers of attorney and orders for their cancellation in an automated information system designed for preparation and storage of powers of attorney, as well as for transmission to persons for representation before whom powers of attorney are issued, for creation and issuance of electronic signature verification key certificates;
- attracting and selecting job candidates;
- conducting business negotiations, providing personal data as part of information communicated by the operator during audits and when providing other audit-related services to the operator, organizing procurement procedures and participating in such procedures, taking due diligence measures and assessing various risks, offering and promoting the operator's products in the market, conducting activities to increase recognition and consumer loyalty, conducting marketing research;
- forming statistical reports for the operator's needs;
- achieving purposes provided for by Russian Federation legislation and performing functions, powers and obligations imposed on the operator by Russian Federation legislation.

6. Legal grounds for personal data processing

6.1. The legal basis for personal data processing is a set of legal acts of the Russian Federation and the Company in effect at the time of personal data processing, in accordance with and pursuant to which the operator processes personal data.

6.2. Legal grounds for processing are:

- Constitution of the Russian Federation dated December 12, 1993;
- Civil Code of the Russian Federation dated November 30, 1994 No. 51-FZ;
- Federal Law dated July 27, 2006 No. 152-FZ "On Personal Data";

- Federal Law dated April 1, 1996 No. 27-FZ "On Individual (Personalized) Accounting in the Mandatory Pension Insurance System";
- Tax Code of the Russian Federation dated July 31, 1998 No. 146-FZ;
- Labor Code of the Russian Federation dated December 30, 2001 No. 197-FZ;
- Federal Law dated December 6, 2011 No. 402-FZ "On Accounting";
- Federal Law dated December 29, 2012 No. 273 "On Education in the Russian Federation";
- Federal Law dated February 9, 2007 No. 16-FZ "On Transport Security";
- Federal Law dated March 19, 1997 No. 60-FZ "Air Code of the Russian Federation";
- Order of the Ministry of Transport of the Russian Federation dated July 19, 2012 No. 243 "On approval of the procedure for formation and maintenance of automated centralized databases of personal data of passengers and personnel (crew) of vehicles, as well as provision of data contained therein";
- Charter of JSC "A-Group";
- agreements to which the personal data subject is a party or beneficiary or guarantor, as well as agreements for conclusion at the initiative of the personal data subject.

6.2.1. In addition, personal data processing is possible in the following cases:

- to protect life, health or other vital interests of the personal data subject, if obtaining consent of the personal data subject is impossible;
- to exercise the rights and legitimate interests of the Operator or third parties or to achieve socially significant purposes, provided that the rights and freedoms of the personal data subject are not violated;
- for statistical or other research purposes, except as provided for by law (subject to mandatory depersonalization of personal data);
- for processing personal data to which access is provided to an unlimited number of persons by the personal data subject or at their request;
- for publication or mandatory disclosure in accordance with Russian Federation legislation.

6.3. Personal data processing is possible in case of obtaining consent of the personal data subject for personal data processing.

6.3.1. The personal data subject makes a decision to provide their personal data and gives consent to their processing freely, by their own will and in their own interest. Consent to personal data processing must be specific, informed and conscious.

6.3.2. Consent to personal data processing may be given by the personal data subject or their representative in any form allowing confirmation of the fact of its receipt, unless otherwise established by federal laws. In case of obtaining consent for personal data processing from a representative of the personal data subject, the powers of this representative to give consent on behalf of the personal data subject are verified by the operator.

6.3.3. Consent to personal data processing may be withdrawn by the personal data subject. In case of withdrawal by the personal data subject of consent to personal data processing, the operator has the right to continue processing personal data without consent of the personal data subject if there are grounds provided for by Federal Law No. 152 "On Personal Data".

7. Categories of personal data subjects

7.1. The content and scope of processed personal data correspond to the stated processing purposes. Processed personal data are not excessive in relation to the stated purposes of their processing.

Categories of personal data subjects may include, but are not limited to:

- individuals who are candidates for vacant positions; operator employees, their family members and close relatives; former operator employees, their family members and close relatives; designated beneficiaries under corresponding insurance contracts for operator employees; alimony recipients from operator employees; work performers who have concluded civil law contracts with the operator; members of the operator's management bodies; operator clients, as well as those not related to them who have concluded or intend to conclude contractual relations with the operator in connection with the operator's administrative and economic activities; representatives of operator client interests (representatives of organizations concluding contracts with the operator); operator counterparties (including their employees

and representatives); those who have acquired or intend to acquire operator services, third-party services through operator mediation; those whose personal data have been made publicly available by them, and their processing does not violate their rights and complies with requirements established by Russian Federation legislation; those sending appeals to the operator; those visiting the operator's real estate facilities; those who have expressed consent to processing of their personal data by the operator; those whose personal data processing is necessary for the operator to achieve purposes provided for by Russian Federation legislation or to implement and fulfill functions, powers and obligations imposed on the operator by Russian Federation legislation;

- **participants in court proceedings and enforcement procedures** involving the Operator;
- **owners** of the Operator (including their employees and representatives).

8. Procedure and conditions for personal data processing

8.1. Personal data processing is carried out in the form of automated processing, processing without using automation means, as well as in the form of mixed personal data processing.

8.2. Personal data processing is carried out on a lawful and fair basis.

8.3. Personal data processing is limited to achieving specific, predetermined and lawful purposes. Processing of personal data incompatible with the purposes of personal data collection is not allowed.

8.4. Combining databases containing personal data, the processing of which is carried out for purposes incompatible with each other, is not allowed.

8.5. Only personal data that meet the purposes of their processing are subject to processing.

8.6. The content and scope of processed personal data correspond to the stated processing purposes. Processed personal data are not excessive in relation to the stated purposes of their processing.

8.7. When processing personal data, accuracy of personal data, their sufficiency, and where necessary, relevance in relation to personal data processing purposes are ensured. The Operator takes necessary measures or ensures their implementation to remove or clarify incomplete or inaccurate data.

8.8. Storage of personal data is carried out in a form allowing identification of the personal data subject, no longer than required by personal data processing purposes, unless the personal data storage period is established by federal laws, an agreement to which the personal data subject is a party, beneficiary or guarantor. Processed personal data are destroyed or depersonalized upon achievement of processing purposes or in case of loss of necessity to achieve these purposes, unless otherwise provided by federal laws.

8.9. The Operator reserves the right, but does not assume obligations for personal data processing in the form of actions (operations) or a set of actions (operations) with personal data performed using automation means or without their use.

8.10. Personal data are stored and processed by the operator for periods necessary for:

- achieving personal data processing purposes;
- fulfilling functions, powers and obligations imposed on the Operator by Russian Federation legislation;
- performing agreements to which the personal data subject is a party, beneficiary or guarantor;
- protecting the operator's rights and legitimate interests, including taking into account limitation periods.

8.11. Transfer of personal data to third parties is carried out only with consent of the personal data subject, unless otherwise provided by federal laws or an agreement to which the personal data subject is a party, beneficiary or guarantor.

8.12. The Operator has the right to transfer personal data to a third party provided for by current legislation of the Russian Federation. In case of entrusting personal data processing of subjects, the agreement must specify information about compliance with personal data confidentiality requirements established by provisions of the Federal Law "On Personal Data".

8.13. Conditions for termination of personal data processing:

- achievement of personal data processing purposes;
- expiration of consent for personal data processing;
- withdrawal of personal data subject's consent for processing their personal data;
- identification of unlawful personal data processing.

8.14. When collecting personal data, including through the Internet, the operator is obliged to

ensure recording, systematization, accumulation, storage, clarification (updating, modification), extraction of personal data of Russian Federation citizens using databases located on the territory of the Russian Federation, except in cases specified in paragraphs 2, 3, 4, 8 of part 1 of article 6 of Federal Law No. 152 "On Personal Data".

8.15. For the purpose of organizing, controlling processing and ensuring security of personal data, the operator has designated participants responsible for personal data processing:

8.15.1. *The person responsible for organizing personal data processing* performs the following functions:

- organizing development of local regulatory acts on personal data processing and security issues and maintaining them in current state;
- conducting internal control and audit of information security for compliance of personal data processing with requirements of Russian Federation legislation, as well as approved local regulatory acts in the field of personal data;
- assessing harm that may be caused to personal data subjects in case of violation of legislation requirements, correlation of specified harm and measures taken to ensure fulfillment of Operator's obligations provided for by legislation;
- organizing security regime for premises where personal data information systems are located, preventing possibility of uncontrolled penetration or stay in these premises of persons who do not have access rights to these premises;
- interaction with authorized body for protection of personal data subjects' rights and other authorized bodies in cases provided for by Russian Federation legislation on personal data;
- formation and sending to authorized body for protection of personal data subjects' rights within terms established by Russian Federation legislation on personal data, notifications about operator's personal data processing (about operator's intention to process) or information letter about making changes to information in the register of operators processing personal data;
- regular monitoring of facts of operator's inclusion in annual consolidated plan for conducting scheduled inspections of business entities for compliance with mandatory requirements in the field of personal data processing;
- organizing development and formation of plan and program for raising awareness on personal data processing and security issues.

8.15.2. *The person responsible for ensuring personal data security* performs the following functions:

- organizing consolidation of list of personal data processing processes and list of personal data information systems;
- organizing work to ensure personal data security in both automated and non-automated personal data processing;
- organizing creation and commissioning of personal data protection system;
- organizing assessment of compliance with requirements of Russian Federation legislation in the field of personal data (internal control and/or information security audit activities regarding personal data);
- organizing information of operator employees about requirements of Russian Federation legislation in the field of personal data security, as well as local regulatory acts on personal data security issues.

8.15.3. *Personal Data Security Commission* performs the following functions:

- conducting assessment of key PDIS parameters;
- establishing necessary level of personal data protection during their processing in PDIS;
- organizing and conducting legal assessment of possibility of creating (modernizing) PDIS, including taking into account requirements of Russian Federation legislation and operator's local regulatory acts;
- conducting assessment of harm that may be caused by personal data subjects in case of violation of current Russian Federation legislation in the field of personal data;
- determining priority directions of operator's activities to ensure personal data security during

their processing using automation means and without using such means;

- assessing effectiveness of personal data security activities and making decisions about necessity of improving adopted personal data security measures;
- coordinating process of deletion, destruction of personal data, including destruction of paper carriers of personal data.

8.16. For the purpose of ensuring personal data security, the person responsible for organizing personal data processing ensures:

- management involvement - activities for organizing processing and ensuring personal data security are initiated and controlled at management level;
- compliance of personal data security measures with requirements of Russian Federation legislation and operator's local regulatory acts in the field of personal data;
- use of a combination of organizational and technical measures to ensure personal data security;
- increasing awareness level of persons admitted to personal data processing on personal data security issues;
- continuous improvement of personal data security processes.

9. Procedure for updating, correcting, deleting and destroying personal data

9.1. In case of confirmation of personal data inaccuracy, the Operator, based on information provided by the personal data subject or their representative or authorized body for protection of personal data subjects' rights, or other necessary documents, clarifies personal data or ensures their clarification (if personal data processing is carried out by another person acting on behalf of the operator) within 5 (five) working days from the date of submission of such information and removes blocking of personal data.

9.2. In case of identification of unlawful personal data processing upon appeal by the personal data subject or their representative or upon request of the personal data subject or their representative or authorized body for protection of personal data subjects' rights, the operator blocks unlawfully processed personal data relating to this personal data subject, or ensures their blocking (if personal data processing is carried out by another person acting on behalf of the operator) from the moment of such appeal or receipt of specified request for the verification period.

9.3. In case of identification of unlawful personal data processing carried out by the operator or person acting on behalf of the operator, the operator within a period not exceeding three working days from the date of this identification, ceases unlawful personal data processing or ensures cessation of unlawful personal data processing by the person acting on behalf of the operator.

9.4. In case it is impossible to ensure lawfulness of personal data processing, the operator within a period not exceeding ten working days from the date of identification of unlawful personal data processing, destroys such personal data or ensures their destruction.

9.5. The operator notifies the personal data subject or their representative about elimination of violations or destruction of personal data, and in case the appeal by the personal data subject or their representative or request of authorized body for protection of personal data subjects' rights were sent by authorized body for protection of personal data subjects' rights, also the specified body.

9.6. In case of achieving the purpose of personal data processing, the operator ceases personal data processing or ensures its cessation (if personal data processing is carried out by another person acting on behalf of the operator) and destroys personal data or ensures their destruction (if personal data processing is carried out by another person acting on behalf of the operator) within a period not exceeding thirty days from the date of achieving the purpose of personal data processing, unless otherwise provided by an agreement to which the personal data subject is a party, beneficiary or guarantor, other agreement between the operator and personal data subject, or if the operator does not have the right to process personal data without consent of the personal data subject based on grounds provided for by federal laws.

9.7. In case of withdrawal by the personal data subject of consent for processing their personal data, the operator ceases their processing or ensures cessation of such processing (if personal data processing is carried out by another person acting on behalf of the operator) and in case preservation of personal data is no longer required for personal data processing purposes, destroys personal data or ensures their destruction (if personal data processing is carried out by another person acting on behalf of the operator) within a period not exceeding thirty days from the date of receipt of specified withdrawal, unless otherwise provided by an

agreement to which the personal data subject is a party, beneficiary or guarantor, other agreement between the operator and personal data subject, or if the operator does not have the right to process personal data without consent of the personal data subject based on grounds provided for by federal laws.

9.8. In case of absence of possibility to destroy personal data within the period specified in clauses 9.3 - 9.5 of this Policy, the operator blocks such personal data or ensures their blocking (if personal data processing is carried out by another person acting on behalf of the operator) and ensures destruction of personal data within a period of no more than six months, unless another period is established by federal laws.

10. Limitations on the application of this Policy

The Policy does not apply to relations arising from:

- processing of personal data by individuals exclusively for personal and family needs, if this does not violate the rights of personal data subjects;
- organizing storage, acquisition, accounting and use of documents containing personal data of the Archival Fund of the Russian Federation and other archival documents in accordance with legislation on archival affairs in the Russian Federation;
- processing of personal data classified in established order as information constituting state secrets.

11. Final provisions

11.1. This Policy, as well as all changes and additions to it, are adopted and approved by the General Director and remain in effect until replaced by new ones.

11.2. The Operator, as well as its officials and employees, bear civil, administrative and other liability for non-compliance with principles and conditions of processing personal data of individuals, as well as for disclosure or illegal use of personal data in accordance with legislation of the Russian Federation.

The Policy is publicly available and shall be posted on the operator's official website or otherwise unrestricted access to this document shall be ensured.