


POLICY
on Personal Data
Processing
ABU LLC*

*UNOFFICIAL TRANSLATION

APPROVED

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ABU LLC

General Director

Resolution

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Amendments

Version	Date of issue	Amendment	Creator
1.0.		Policy Approval	S. Vesnina

1. Key Terms and Definitions

- **Automated Processing of Personal Data** - processing of personal data using computer technology;
- **Blocking of Personal Data** - temporary termination of personal data processing (unless the processing is required to clarify personal data);
- **Personal Data Information System** - a set of personal data stored in database as well as a set of information technologies and technical means providing processing;
- **Anonymization of Personal Data** - actions that make impossible to determine the ownership of personal data without additional information;
- **Processing of Personal Data** - an action (operation) or set of actions (operations) with the help of automation tools or without it that includes collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data;
- **Personal Data Operator (Operator)** - a state body, municipal body, legal entity or private person, independently or jointly with other persons that organizes and (or) processes personal data, as well as determines the purposes of processing, composition of the data to be processed, actions (operations) performed with the personal data;
- **Personal Data (PD)** - any information related directly or indirectly to a specified or determined individual (personal data owner);
- **Personal Data Provision** - actions that aim a disclosure of personal data to a specific person or group of persons;
- **Personal Data Disclosure** - actions that aim to release personal data to public;
- **Cross-Border Transfer of Personal Data** - the transfer of personal data to the territory of a foreign state, foreign government body, foreign individual or foreign legal entity;
- **Personal Data Destruction** - actions, that make impossible to restore the content of personal data in the Personal Data Information System, and (or) that destroy physical media on which personal data is stored.



2. General

- 2.1 This Policy on Personal Data prepared by ABU LLC (hereinafter referred to as the Policy) is an official document that defines general principles, purposes and procedure for the personal data processing (hereinafter referred to as PD), as well as the information about the implemented measures related to the protection of personal data.
- 2.2 This Policy applies to all employees of ABU LLC (hereinafter the Operator), as well as to the employees of third-party organizations interacting with the Operator under corresponding agreements, regulatory, legal, organizational and administrative acts.
- 2.3 This Policy enters into force from the date of its approval and is valid indefinitely, until is replaced by a new Policy.

3. Purpose of Personal Data Collecting

3.1. The Operator shall process Personal Data exceptionally for the following:

- Compliance with laws and other regulatory legal acts;
- Assisting employees in professional promotion;
- HR record management;
- Actions provided for by the Charter;
- Compliance with the labor laws;
- Calculation and payment of temporary disability benefits;
- Determination of the possibility to perform labor function;
- Supervision of the quantity and quality of work performed;
- Ensuring the property safety;
- Keeping HR records and accounting;
- Registration of an additional health insurance policy;
- Compliance with corporate Company acts;
- Communication with a person;
- Assistance in recruitment and choosing a suitable position;
- Maintaining the general data base of employees (information support);
- Fulfillment of contractual obligations;
- Issue of the service request.

4. Legal Basis for Personal Data Processing

4.1. The operator processes Personal Data in accordance with the following regulatory and legal acts:

- Labour Code of the Russian Federation, Articles 86-90;
- Labour Code of the Russian Federation, Article 65;
- Tax Code of the Russian Federation;
- Federal Law N 167-FZ “On Compulsory Pension Insurance in the Russian Federation”, dated December 15, 2001;
- Federal Law N 255 “On Compulsory Social Insurance in Case of Temporary Disability and due to Motherhood” dated December 29, 2006, Article 13;
- Federal Law N 61-FZ “On Defense”, dated May 31, 1996, Article 8;
- Resolution of the State Statistics Committee of the Russian Federation N 1 “On Approval of Standard Forms of Primary Accounting Documents for Labor Accounting and Payment”, dated January 5, 2004;
- Consent to Personal Data processing;
- The Charter of the Operator

5. Scope and Types of Processed Personal Data

5.1. The Operator processes the following types of Personal Data:

PD Owner	PD Type	Scope of Processed Data
Employees, former employees	Other Personal Data; Public Personal Data	Less 100 000 owners
Immediate family	Other Personal Data	Less 100 000 owners
Job applicants	Other Personal Data	Less 100 000 owners
Individuals employed under civil law contracts	Other Personal Data	Less 100 000 owners
Employees of third-party organizations, including counterparties	Other Personal Data	Less 100 000 owners
Site Visitors	Other Personal Data	Less 100 000 owners

6. Processing Procedure and Environment

- 6.1 PD processing is legal and fair.
- 6.2 PD processing is limited to the achievement of specific, predetermined and legitimate purposes. PD processing incompatible with the purposes of data collection is not allowed.
- 6.3 It is not allowed to combine various databases containing PD, which processing is carried out for the purposes incompatible with each other.
- 6.4 Only the Personal Data that meet the purposes of its processing is the subject of processing.
- 6.5 The content and volume of the processed Personal Data is consistent with the announced purposes and is not excessive in regards to the announced processing purposes.
- 6.6 It is ensured that the processing PD is accurate, adequate, and, if necessary, relevant to the purposes of processing. Necessary measures are taken to delete or clarify incomplete or inaccurate data.
- 6.7 The Operator can create public sources of Personal Data if required (such as directories, electronic databases, online content on the Operator's web site). Public sources of Personal Data may include only the data that the PD owner has agreed, in writing, to place in open sources.
- 6.8 Personal data is stored in a form that allows to determine the owner of Personal Data no longer than the purpose of the PD processing requires, if the PD storage period is not established by Federal law, and/or by a contract under which the PD owner acts as a beneficiary, guarantor, or a party. The processed PD is to be destructed or depersonalized when the processing purposes have been achieved, or they are unnecessary to achieve, unless otherwise provided by Federal law.

7. Terms and Conditions for the PD Processing Termination

- 7.1. The Operator terminates the PD processing in the following cases:
 - PD processing purposes has been achieved or maximum storage period has been expired - within 30 days;
 - There is no further need to process Personal Data - within 30 days;
 - The PD Owner or his/her legal representative provides information confirming that the Personal Data has been obtained illegally or it is not necessary for the stated purpose of processing - within 7 days;
 - It is impossible to ensure the legitimate PD processing - within 10 days;



- The Owner of Personal Data has withdrawn his/her consent to the PD processing, if the PD storage is no longer required for processing - within 30 days;
- Limitation period for legal relations, during which the PD is (was) processed, has been expired.

7.2. According to Federal Law N 152-FZ “On Personal Data”, dated July 27, 2006, Article 21, Part 5 the Operator does not terminate the PD processing and does not destroy it in the following cases:

- The contract under which the PD owner is a beneficiary, guarantor, or a party provides for otherwise;
- The Operator has the right to process Personal Data without the consent of the PD Owner on the grounds provided for by Federal laws;
- The terms of the PD processing established by the Russian Federal laws and other regulatory acts have not expired.

8. Personal Data Security Assurance

8.1. The Operator takes legal, organizational, technical and program measures, necessary and sufficient to meet the legislation requirements related to the Personal Data protection to ensure the security of processed Personal Data.

8.2. The Operator takes the necessary organizational and technical measures to protect the Personal Data from accidental or unauthorized access, destruction, alteration, access blocking and other unauthorized actions.

8.3. The Operator undertakes the following organizational and technical measures:

- Appoint officials responsible for the PD processing facilitation, as well as safety and security arrangement;
- Appoint and moderate the group of employees having access to the Personal Data;
- Make the employees aware with the requirements of Federal law and local regulatory acts related to processing and protection of the Personal Data;
- Ensure that the recording and storage of PD tangible media and their circulation excludes theft, substitution, unauthorized copying, or destruction;
- Identify the security risks for PD processing in PD information systems (hereinafter - PDIS), generate threat models on their basis;
- Develop the Personal Data security system based on a threat model considering the appropriate security level during data processing in PDIS;
- Verify the readiness and efficiency of the information security tools;
- Implement an authorization system for PDIS users to access information resources, software and hardware for processing and protecting information;



- Register and record actions of the PDIS users;
- Introduce password protection for the PDIS users access;
- Use, if necessary, cryptographic information protection to ensure the PD security when transmitting Personal Data via open communication channels and storage on removable data media;
- Implement virus protection, prevent the introduction of malicious programs (software viruses) and software bugs into the corporate network;
- Use firewalls where necessary;
- Use, if necessary, detectors of intrusion into the corporate network as it creates the grounds for violation of the established requirements for the PD security;
- Train the Operator's employees how to handle the information protection tools used in PDIS;
- Maintain the applied PD protection systems, review operational and technical documentation;
- Use the properly verified PD protection tools, when necessary;
- Monitor the actions of the PDIS users, examine violations of the PD safety requirements;
- Maintain the constant readiness of the security equipment and alarm systems.

9. Rights of the Personal Data Owner

9.1. The PD Owner has the right to receive information regarding his/her PD processing including the following:

- Confirmation of the PD processing from the Operator;
- Legal grounds and purposes of the PD processing;
- Purposes and methods that the PD processing Operator uses;
- Name and location of the Operator, information on the persons (except the Operator's employees) who have access to Personal Data, or who can disclose Personal Data under a contract with the Operator, or according to the Federal Law;
- Processing data related to the relevant PD Owner, source of its receipt, unless otherwise provided for by the Federal Law;
- Terms of PD processing, including storage periods;
- Procedure for implementation of the rights of the PD Owner stipulated by Federal Law "On Personal Data";



- Information on completed or planned PD cross-border transfer;
 - Company name, full name and the address of the person processing PD on behalf of the Operator, if such a person is or will be authorized to process the data;
 - Other data provided for by Federal Law “On personal Data” or other Federal legislative acts.
- 9.2. The PD Owner has the right to require from the Operator to clarify his/her PD, block or destroy it, if the data is incomplete, outdated, inaccurate, illegally obtained or unnecessary for the stated processing purpose, as well as to take measures prescribed by the Law to protect his/her rights.
- 9.3. If the PD Owner considers that the Operator, processing his/her PD, violates the requirements of Federal Law “On Personal Data”, or otherwise violates his/her rights and freedoms, he/she is authorized to appeal against the Operator’s action or inaction to a higher authority (Federal Service for Supervision in Communication, IT and Mass Media - Roskomnadzor) or in court.
- 9.4. The PD Owner has the right to protect his rights and legitimate interests, including compensation for losses and (or) compensation for non-pecuniary damage in court.

10. Final Provisions

- 10.1. The person responsible for the Personal Data processing supervises the implementation of the requirements of this Policy.
- 10.2. Federal Law “On Personal Data” and other legal acts related to the Personal Data protection governs the rights and responsibilities of the Operator.
- 10.3. Officials guilty of a violation of the regulations governing the PD processing and protection bear material, disciplinary, administrative, civil or criminal liability in the manner prescribed by the Federal Laws.