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APPROVED
by Order of the General Director
of POLATI LLC
No. 228.2/22-a dated "23" November 2022

**POLICY
OF POLATI LIMITED LIABILITY COMPANY
(POLATI LLC)
ON THE PROCESSING OF PERSONAL DATA**

Mytishchi, Moscow Oblast

Content:

	TERMINOLOGY AND ABBREVIATIONS USED	2
1	GENERAL PROVISIONS	4
2	DEFINITION AND SCOPE OF PERSONAL DATA	6
3	PURPOSES OF PERSONAL DATA PROCESSING	6
4	LEGAL GROUNDS FOR PERSONAL DATA PROCESSING	6
5	PERSONAL DATA PROCESSING PERIODS	6
6	RIGHTS AND OBLIGATIONS	7
7	PROCEDURE AND CONDITIONS FOR PERSONAL DATA PROCESSING	8
8	ENSURING THE SECURITY OF PERSONAL DATA	9
9	FINAL PROVISIONS	10
10	APPENDIX TO THE POLICY	10

TERMINOLOGY AND ABBREVIATIONS USED

Terms	Definitions
Personal data	Any information relating to an identified or identifiable individual (personal data subject).
Personal data operator (operator)	In the Policy – POLATI Limited Liability Company, located at the following address: 141006, Moscow Oblast, Mytishchi, 29A Olimpiyskiy Prospekt, office 402.
Personal data processing	Any action (operation) or set of actions (operations) performed on personal data with or without the use of automation tools. Processing of personal data includes: Personal data processing includes, among others: - collection; - recording; - systematization; - accumulation; - storage; - clarification (updating, modification); - retrieval; - use; - transfer (distribution, provision, access); - anonymization; - blocking; - deletion; - destruction.
Automated processing of personal data	Processing of personal data using computing equipment.
Distribution of personal data	Actions aimed at disclosing personal data to an indefinite number of persons.
Provision of personal data	Actions aimed at disclosing personal data to a specific person or a specific group of persons.
Blocking of personal data	Temporary suspension of personal data processing (except where processing is necessary for clarification).
Destruction of personal data	Actions as a result of which restoring the content of personal data in the personal data information system becomes impossible and (or) as a result of which tangible media of personal data are destroyed.
Anonymization of personal data	Actions as a result of which determining the ownership of personal data by a specific personal data subject becomes impossible without the use of additional information.
Personal data information system	A set of personal data contained in databases and the technologies and tools used for processing them.
Cross-border transfer of personal data	Transfer of personal data to the territory of a foreign country to a foreign authority, foreign individual, or foreign legal entity.

1. GENERAL PROVISIONS

- 1.1. Ensuring the confidentiality and security of personal data processing at POLATI LLC (hereinafter referred to as the Company, POLATI LLC, or the Operator) is one of the Company's priority objectives.
- 1.2. For these purposes, POLATI LLC has implemented a set of organizational and administrative documentation that is mandatory for all employees involved in personal data processing.
- 1.3. The processing, storage, and maintenance of the confidentiality and security of personal data are in accordance with the current legislation of the Russian Federation in the field of personal data protection, and in accordance with the Company's bylaws.
- 1.4. Pursuant to Part 2 of Article 18.1 of Federal Law No. 152-FZ "On Personal Data," this Policy is published in open access on the Internet on the Operator's official website.
- 1.5. This Policy defines the principles, procedures, and conditions for processing personal data of POLATI LLC employees, job applicants, counterparties (representatives of counterparties), and other individuals whose personal data is processed by the Company, in order to ensure the protection of human and civil rights and freedoms, including the right to privacy, personal and family secrets. It also establishes the liability of POLATI LLC employees with access to personal data for non-compliance with the requirements of regulations governing the processing and protection of personal data.
- 1.6. Since this Policy is subject to public access in accordance with Part 2 of Article 18.1 of Federal Law No. 152-FZ "On Personal Data," it **does not contain** detailed information on the measures taken to protect personal data in POLATI LLC, nor any other information that, if made accessible to an unlimited number of persons, could harm the Company or personal data subjects.

2. DEFINITION AND SCOPE OF PERSONAL DATA

- 2.1. In POLATI LLC, personal data refers to any information relating to an identified or identifiable individual (personal data subject).
- 2.2. The list of personal data subject to protection in the Company is determined by the purposes of its processing, Federal Law No. 152-FZ "On Personal Data Protection" (hereinafter – the Law on Personal Data), the Labour Code of the Russian Federation, and other regulatory legal acts.
- 2.3. The Company has approved a list of personal data subject to protection.
- 2.4. The Company processes personal data of the following categories of personal data subjects.

2.4.1. Employees and former employees of the Company.

Personal data of employees processed both with and without the use of automation tools include:

- full name (including previous names);
- passport or other identity document data;
- date and place of birth;
- citizenship;
- military registration data, including conscription status;
- documents certifying professional education and professional retraining, advanced education and internship;
- documents confirming special qualifications;
- documents on academic degrees, titles, scientific works and inventions, awards, and honours;
- knowledge of foreign languages;
- marital status and family composition;
- information on social benefits, pensions, and insurance;
- disability documents (if any);
- results of medical examinations needed solely to determine fitness for work (excluding diagnosis and medical details);
 - employment duration and other data from the employment record book and the insert of the employment record book, or employment history and records (per Labour Code Article 61);
- job title and qualification level;

- salary (income), bank accounts, cards;
- residential address (registered and actual), date of registration;
- phone number (home, mobile);
- email address;
- details of the certificate of registration with the tax authority of an individual at the place of residence in the Russian Federation;
- details of the state pension insurance certificate;
- compulsory medical insurance policy data;
- biometric data: photographs (including digital), video images, height, weight, clothing/shoe size.

2.4.2. Users of the Company's websites, which in turn are divided into the following subcategories of personal data subjects:

2.4.2.1. Persons applying for vacant positions with the Operator who have submitted their resumes and/or applications in person or through specialized recruitment agencies (staffing agencies) (hereinafter referred to as Job applicants).

The Company processes the following categories of personal data of Job applicants using automated means:

- full name;
- e-mail;
- telephone number;
- IP address;
- cookie information;
- browser information;
- access time;
- referrer (previous page address);
- other personal data included in resumes and cover letters.

2.4.2.2. Clients and/or counterparties of the Company (individuals).

The Company processes the following categories of personal data of Clients and counterparties of the Company (individuals) using automated tools:

- full name;
- job title;
- e-mail;
- telephone number;
- place of work;
- IP address;
- cookie information;
- browser information;
- access time;
- referrer (previous page address);
- other personal data provided by clients and/or counterparties (individuals) necessary for the conclusion and performance of contracts.

2.4.2.3. Representatives (employees) of clients and/or counterparties of the Company (legal entities).

The Company processes the following categories of personal data of Representatives of clients and/or counterparties of the Company (legal entities) using automated tools:

- full name;
- job title;
- e-mail;
- telephone number;
- place of work;
- IP address;
- cookie information;
- browser information;

- access time;
- referrer (previous page address);
- other personal data provided by representatives of clients and/or counterparties (individuals), necessary for the conclusion and execution of contracts.

3. PURPOSES OF PERSONAL DATA PROCESSING

- 3.1. For each personal data category, specific processing purposes are defined and approved. Processing for incompatible purposes is not permitted.
- 3.2. For each processing purpose, the Operator has defined the categories and list of personal data processed, groups of subjects whose personal data are processed, legal grounds for processing personal data and the methods of processing. The corresponding composition of purposes, groups of subjects, categories, list of personal data and legal grounds for their processing are provided in Appendix No. 1 to the Policy.
- 3.3. The processed personal data are subject to destruction or anonymization upon expiration of the storage period, achievement of the processing purposes, or in the event of loss of need to achieve these purposes, unless otherwise provided by the legislation of the Russian Federation.

4. LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

- 4.1. Personal data are processed by the Company on the basis of:
 - the Labour Code of the Russian Federation;
 - the Charter of POLATI LLC;
 - agreements concluded between POLATI LLC and the personal data subject;
 - consent of the data subject.

5. PERSONAL DATA PROCESSING PERIODS

- 5.1. Processing duration is determined by the time needed to achieve processing purposes, unless otherwise specified by law or contract.
- 5.2. The processing timeframes for personal data are determined in accordance with the term of the contract (agreement) with the personal data subject, Order No. 236 of the Federal Archival Agency dated 20 December 2019, "On Approval of the List of Standard Management Archival Documents Generated in the Course of Activities of State Bodies, Local Governments, and Organizations, Indicating Their Storage Periods," the statute of limitations, and other requirements of Russian legislation.
- 5.3. The operator stores personal data in a form that allows for the identification of the personal data subject for no longer than required for the purposes of processing the personal data, unless the storage period for personal data is established by federal law, an agreement to which the personal data subject is a party, beneficiary, or guarantor.
- 5.4. POLATI LLC creates and stores documents containing information about personal data subjects. Requirements for the use of these standard document forms within the Company are established by Russian Government Resolution No. 687 of 15 September 2008, "On Approval of the Regulation on the Specifics of Personal Data Processing Carried Out Without the Use of Automation."
- 5.5. The storage period for personal data processed in personal data information systems corresponds to the storage period for personal data on paper.
- 5.6. Personal data processing is terminated within the timeframes established by Federal Law No. 152-FZ in the following cases:
 - upon achievement of the purpose of personal data processing or in case of loss of need to achieve the purpose of personal data processing, unless otherwise provided by Federal Law No. 152-FZ "On Personal Data";
 - in case of amendment or invalidation of regulatory legal acts establishing the legal grounds for personal data processing;

- upon detection of the fact of unlawful processing of personal data;
- upon withdrawal of consent to the processing of his personal data by the personal data subject (with some exceptions), if, in accordance with the Law on Personal Data, their processing is permitted only with consent.

5.7. If the personal data subject applies to the Operator with a request to terminate the processing of personal data within a period not exceeding 10 (ten) business days from the date of receipt by the Operator of the relevant request, the processing of personal data shall be terminated, except for cases provided for by the Law on Personal Data. The specified period may be extended, but not more than by 5 (five) business days. For this, the Operator must send the personal data subject a reasoned notice indicating the reasons for the extension.

6. RIGHTS AND OBLIGATIONS

6.1. The Company as a personal data operator has the right to:

6.1.1. Independently determine the scope and list of measures necessary and sufficient to ensure compliance with the obligations stipulated by the Personal Data Law and the regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws.

6.1.2. Entrust the processing of personal data to another person with the consent of the personal data subject, unless otherwise provided by federal law, on the basis of a contract concluded with such a person. The agreement with the person processing personal data must define the list of personal data, the list of actions (operations) to be performed with the personal data, the purposes of their processing, the obligation of the processor to maintain the confidentiality of the personal data, as well as other mandatory terms in accordance with the Personal Data Law, including compliance with principles and rules of processing, reporting to the Operator, and notifying the Operator of any unauthorized access to personal data.

6.1.3. In the event that a personal data subject withdraws their consent to the processing of personal data, the Operator has the right to continue processing without consent if there are legal grounds for doing so as set forth in the Personal Data Law.

6.1.4. Provide personal data of subjects to third parties when required by applicable law (e.g., tax authorities, law enforcement agencies, etc.).

6.1.5. Defend their interests in court.

6.2. The Company, as a personal data operator, is obliged to:

6.2.1. Organize the processing of personal data in compliance with the requirements of the Personal Data Law.

6.2.2. Ensure that each personal data subject has access to documents and materials containing their personal data, unless otherwise provided by law.

6.2.3. Make necessary corrections, delete or block personal data in cases where the subject provides incomplete, outdated, inaccurate, or unlawfully obtained data, and notify the subject accordingly.

6.2.4. Respond to inquiries and requests from personal data subjects or their legal representatives in accordance with the requirements of the Personal Data Law.

6.2.5. Provide, upon request of the authorized body for the protection of personal data subjects' rights (Roskomnadzor), the necessary information within 10 working days from the date of receipt. This period may be extended by no more than 5 working days, with a reasoned notice explaining the extension. To do so, the Operator must submit a reasoned notice to Roskomnadzor stating the reasons for extending the deadline for providing the requested information;

6.2.6. Comply with the requirements of the legislation of the Russian Federation.

6.3. The personal data subject has the right to:

6.3.1. Request the clarification of their personal data, or the blocking or destruction of their personal data if it is incomplete, outdated, inaccurate, unlawfully obtained, or not necessary for the stated purpose of processing, and take legal measures to protect their rights.

- 6.3.2. Obtain information about the processing periods of their personal data, including the duration of storage.
- 6.3.3. Request that all persons who previously received incorrect or incomplete personal data be informed of any changes, corrections, or additions made.
- 6.3.4. File complaints to the authorized body for the protection of personal data subjects' rights or challenge unlawful actions or inaction regarding their personal data in court.
- 6.3.5. Exercise other rights provided for by the legislation of the Russian Federation.

6.4. The personal data subject is obliged to:

- 6.4.1. Provide accurate personal data necessary to achieve the processing purposes and confirm their accuracy by presenting original documents.
- 6.4.2. Notify the Company of any changes to personal data necessary to achieve processing purposes and confirm the updates with supporting documents.
- 6.4.3. Comply with the requirements of the legislation of the Russian Federation.
- 6.5. Control over compliance with this Policy is carried out by the authorized person responsible for organizing the processing of personal data in the Company.

7. PROCEDURE AND CONDITIONS FOR PERSONAL DATA PROCESSING

- 7.1. Personal data is processed by the Operator in accordance with the legislation of the Russian Federation.
- 7.2. The Operator obtains personal data directly from the personal data subject, their representative, or from a person who has assigned the Operator to process personal data, unless otherwise stipulated by Russian law.
- 7.3. The processing of personal data is carried out with the consent of personal data subjects to the processing of their personal data, and without such consent in cases stipulated by the legislation of the Russian Federation.
- 7.4. In cases stipulated by the legislation of the Russian Federation, the processing of personal data may continue even after the subject has withdrawn their consent.
- 7.5. Access to personal data is granted to the Operator's employees who need personal data in connection with the performance of their official duties.
- 7.6. POLATI LLC carries out both automated and non-automated processing of personal data (mixed processing).
- 7.7. Processing of personal data within the Company includes: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction.
- 7.8. The Operator has the right to transfer personal data to inquiry and investigation authorities or other authorized bodies under the grounds established by Russian law.
- 7.9. Disclosure or dissemination of personal data to third parties without the consent of the personal data subject is not permitted unless otherwise provided by federal law. Consent for processing personal data allowed by the personal data subject for public dissemination must be obtained separately from other consents of the personal data subject.
- 7.10. The Operator shall take the necessary legal, organizational, and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, distribution, and other unauthorized actions, including:
 - Identifying threats to personal data security during processing;
 - Adopting internal regulations and other documents governing personal data protection;
 - Appointing persons responsible for personal data security within departments and information systems;
 - Creating secure conditions for working with personal data;
 - Keeping records of documents containing personal data;
 - Managing information systems that process personal data;
 - Storing personal data in a manner that prevents unauthorized access.

7.7. The Company stores personal data in a form that allows identification of the personal data subject for no longer than necessary to achieve the purposes of processing, unless a longer storage period is required by federal law or contract.

7.8. The processing of personal data in POLATI LLC is based on the following principles:

- Legality of purposes and processing methods;
- Compliance of processing purposes with those defined at the time of data collection;
- Compliance of the volume and nature of the processed personal data, methods of processing personal data with the purposes of processing personal data;
- Reliability of personal data, their sufficiency for the purposes of processing, inadmissibility of processing personal data that is excessive in relation to the purposes declared when collecting personal data;
- Inadmissibility of combining databases containing personal data created for incompatible purposes;
- Storing personal data in a form that allows the identification of the subject of personal data for no longer than is required for the purposes of their processing;
- Destruction upon achieving the purposes of processing personal data or in the event of loss of the need to achieve them.

7.9. When collecting personal data, including via the Internet, the Company ensures that personal data of Russian citizens is recorded, systematized, accumulated, stored, clarified (updated, modified), and retrieved using databases located in the territory of the Russian Federation, except in cases stipulated by the Personal Data Law.

8. ENSURING THE SECURITY OF PERSONAL DATA

8.1. The security of personal data during its processing in the Company is ensured in accordance with the legislation of the Russian Federation and the requirements of the authorized government body for the protection of personal data subjects' rights, the federal executive body authorized in the field of security, and the federal executive body authorized in the field of countering technical intelligence and providing technical protection of information.

8.2. The security of personal data in the Company is ensured by the implementation of agreed measures aimed at preventing (neutralizing) and eliminating threats to the security of personal data, minimizing possible damage, as well as measures to restore data and the operation of personal data information systems in the event of the implementation of threats.

8.3. The Company shall take the necessary organizational and technical measures to protect personal data from accidental or unauthorized access, destruction, modification, blocking of access and other unauthorized actions.

8.4. The security measures implemented by the Company when processing personal data include, among others:

- the adoption of local regulatory and administrative acts in the field of processing and protection of personal data;
- the appointment of officials responsible for ensuring the security of personal data in the divisions and information systems of the Company;
- creation of proper conditions for handling physical media and systems containing personal data;
- the organization of accounting of tangible media of personal data and information systems in which personal data are processed;
- storing physical personal data carriers under conditions that ensure their safety and prevent unauthorized access;
- and other measures established by the applicable legislation in the field of personal data protection.

8.5. When processing personal data, take the necessary legal, organizational and technical measures, including the measures established by Art. 18.1. of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data" or ensure their adoption to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well

as from other illegal actions in relation to personal data.

8.6. Personal data is processed using software and automated tools with the use of databases located within the territory of the Russian Federation.

8.7. If it is determined that there has been an unlawful or accidental disclosure (provision, dissemination, access) of personal data that results in a violation of data subjects' rights, the Operator must notify the authorized agency as follows:

8.7.1. within 24 (twenty-four) hours:

- about the incident that occurred, including the list of personal data, categories of personal data subjects, the number of personal data subjects affected by the incident;
- about the alleged reasons that led to the violation of the rights of personal data subjects;
- about the alleged harm caused to the rights of personal data subjects;
- about the measures taken to eliminate the consequences of the relevant incident;
- about the person authorized by the Operator to interact with the authorized body for the protection of the rights of personal data subjects on issues related to the identified incident.

8.7.2. within 72 (seventy-two) hours: on the results of the internal investigation of the identified incident, and also provide information on the persons whose actions caused the identified incident (if any).

9. FINAL PROVISIONS

9.1. This Policy is subject to public access. The current version of the Policy is available in open access on the Internet at the following address: https://polati.ru/en/footer/privacy_policy_doc.

9.2. This Policy is approved by the General Director and applied in all separate divisions of POLATI LLC on the territory of the Russian Federation.

9.3. This Policy shall be amended or supplemented in the event of the adoption of new legislation or special regulatory documents concerning personal data processing and protection. The new version of the Policy comes into effect from the moment it is published on the Operator's website, unless otherwise specified by the new version.

9.4. Compliance with the requirements of this Policy shall be monitored by the person responsible for organizing the processing of personal data at POLATI LLC.

9.5. The liability of POLATI LLC officials with access to personal data for failure to comply with the requirements of the regulations governing the processing and protection of personal data shall be determined in accordance with the legislation of the Russian Federation and the internal documents of the Company.

10. APPENDIX TO THE POLICY

10.1. Appendix No. 1 - Categories of personal data subjects, list of processed personal data, methods of processing, and legal grounds for each of the purposes of personal data processing.

Appendix No. 1 to the Policy of OOO POLATI

CATEGORIES OF PERSONAL DATA SUBJECTS, LIST OF PROCESSED PERSONAL DATA, METHODS OF PROCESSING AND GROUNDS FOR EACH PURPOSE OF PERSONAL DATA PROCESSING

No.	Purpose of personal data processing	Categories of data subjects	List of personal data	Legal grounds for processing	List of actions	Processing method
Personal data information system "Employees"						
1	Compliance with labour legislation in the context of labour and other directly related relations, access control (HR and accounting records management)	Employees and former employees of the Company	As specified in Clause 2.4.1 of the Policy	Pursuant to Clauses 1, 2, and 5 of Part 1 of Article 6 of Federal Law No. 152-FZ	Collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (dissemination, access), depersonalization, blocking, deletion, destruction	Mixed
Personal data information system "Website Users"						
1	Recruitment for vacant positions	Job applicants (candidates) seeking employment with the Company	As specified in Clause 2.4.2.1 of the Policy	Pursuant to Clauses 1 and 2 of Part 1 of Article 6 of Federal Law No. 152-FZ	Collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (dissemination, access), depersonalization, blocking, deletion, destruction	Automated
2	Activities in accordance with the Company's Charter,	Clients and/or counterparties of	As specified in Clause 2.4.2.2 of the Policy	Pursuant to Clauses 1, 2, and 5 of Part 1 of	Collection, recording, systematization, accumulation, storage,	Automated

	access control, conclusion and performance of contracts	the Company (individuals)		Article 6 of Federal Law No. 152-FZ	clarification (updating, modification), retrieval, use, transfer (dissemination, access), depersonalization, blocking, deletion, destruction	
3	Activities in accordance with the Company's Charter, access control, conclusion and performance of contracts	Representatives (employees) of clients and/or counterparties of the Company (legal entities)	As specified in Clause 2.4.2.3 of the Policy	Pursuant to Clauses 1, 2, and 5 of Part 1 of Article 6 of Federal Law No. 152-FZ	Collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (dissemination, access), depersonalization, blocking, deletion, destruction	Automated