**Policy on personal data processing**

APPROVED

Order No. PD1 of 26.06.2017

**POLICY**

**with regard to processing of personal data   
GeoSeysControl Scientific and Production Center CJSC**

**1. general provisions**

1.1 This Personal Data Processing Policy (hereinafter - "*Policy"*) is prepared in accordance with Section 2 Part 1 Article 18.1 of the Russian Federation Federal Law "On Personal Data" No. 152-FZ dated July 27, 2006 (hereinafter - "*the Law"*) and sets forth the position of GeoSeysControl NPC CJSC (hereinafter - "*the Company"*) regarding the processing and protection of personal data (hereinafter - "*the Data"*), observance of human rights and freedoms, and in particular the right to privacy and confidentiality of personal and family life.

**2 Area of application**

2.1 This Policy applies to Data received both before and after the enactment of this Policy.

2.2.Understanding the importance and value of Data, as well as taking care to respect the constitutional rights of citizens of the Russian Federation and citizens of other states, the Company provides reliable protection of Data.

**3. definitions**

3.1 Data means any information relating to a directly or indirectly defined or identifiable natural person (citizen), i.e. such information includes in particular: Full name, year, month, date and place of birth, address, information about family, social, property status, information about education, profession, income, phone number, e-mail address for communication, passport data, TIN, SNILS when filling out the form, including the information contained in the customer questionnaire, as well as other information.

3.2 Processing of Data shall mean any action (operation) or a set of actions (operations) with Data performed using automated means and/or without the use of such means. Such actions (operations) include: collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of Data.

3.3 Data security means protection of Data from unauthorized and/or unauthorized access, destruction, change, blocking, copying, provision, distribution of Data, as well as from other unlawful acts in relation to Data.

**4. Legal basis and purposes of data processing**

4.1 Processing and security of Data in the Company shall be carried out in accordance with the requirements of the Constitution of the Russian Federation, the Law, the Labor Code of the Russian Federation, by-laws, other federal laws of the Russian Federation, guiding and methodological documents of FSTEC of Russia and FSS of Russia that determine cases and specifics of Data processing.

4.2 Subjects of Data processed by the Company are:

- employees of the Company, relatives of Company employees, within the limits determined by the laws of the Russian Federation, if information about them is provided by the employee;

- persons who are members of the Company's management bodies and are not employees;

- Individuals with whom the Company enters into contracts of a civil law nature;

- representatives of legal entities - counterparties of the Company;

 4.3. The Company processes Subject Data for the following purposes:

- exercising the functions, powers and duties vested in the Company by the laws of the Russian Federation in accordance with the federal laws, including but not limited to: The Civil Code of the Russian Federation, the Tax Code of the Russian Federation, the Labor Code of the Russian Federation, the Family Code of the Russian Federation, the Federal Law of 01.04.1996 № 27-FZ "On individual (personalized) accounting in the mandatory pension insurance system", the Federal Law of 27.07.07.2006 № 152-FZ "On Personal Data", Federal Law of 28.03.1998 № 53-FZ "On Military Duty and Military Service", Federal Law of 26.02.1997 № 31-FZ "On mobilization training and mobilization in the Russian Federation", Federal Law of 8.02.02.1998 No. 14-FZ "On Limited Liability Companies", Federal Law of 26.12.1995 No. 208-FZ "On Joint-Stock Companies", Federal Law of 12.01.1996 No. 7-FZ "On Non-Profit Organizations", Federal Law of 07.02.1992 No. 2300-1 "On Protection of Consumer Rights", Federal Law of 21.11.1996 № 129-FZ "On Accounting", Federal Law of 08.08.2001 № 129-FZ "On State Registration of Legal Entities and Individual Entrepreneurs", as well as data operators, the Charter and local acts of the Company.

Employees in order to comply with labor, tax and pension laws of the Russian Federation, namely:

- helping employees with employment, training and career advancement;

- calculation and accrual of wages;

- organization of business trips (business trips) of employees;

- execution of powers of attorney (including for the representation of the Company's interests before third parties);

- Ensuring the personal safety of employees;

- control the quantity and quality of the work performed;

- Ensuring the safety of property;

- compliance with the pass control regime on the Company's premises;

- timekeeping;

- use various types of benefits in accordance with the Labor Code of the Russian Federation, the Tax Code of the Russian Federation, federal laws, as well as the Company's Charter and regulations;

- voluntary life, health and/or accident insurance.

Individual counterparties for the purposes of:

- the conclusion and execution of a contract, one party to which is a natural person;

- to consider opportunities for further cooperation. Representatives of legal entities - the Company's counterparties in order to:

- negotiating, concluding and executing contracts, under which the data of such legal entity's employees are provided for the purpose of executing the contract in various areas of the Company's business activities.

Individuals whose Data is processed in the interests of third parties - Data Operators on the basis of a contract (instructions from Data Operators) for the purpose of executing contracts - instructions from Data Operators.

Relatives of the Company's employees for the purpose of:

- the fulfillment of the requirements of the legislation of the Russian Federation;

- providing additional benefits; participation in corporate events.

**5. Principles and conditions of data processing**

5.1 When processing Data, the Company adheres to the following principles:

- Data is processed in a lawful and fair manner;

- The Data shall not be disclosed to third parties and shall not be disseminated without the consent of the Data subject, with the exception of cases requiring the disclosure of Data at the request of authorized government bodies, legal proceedings;

- Determination of specific legitimate purposes before processing (including collection) of Data;

- Only data that is necessary and sufficient for the stated purpose of processing is collected;

- Combining databases containing Data whose processing is incompatible with each other is not permitted;

- Processing of Data is limited to achieving specific, predetermined and legitimate purposes;

- Processed Data shall be destroyed or depersonalized upon attainment of the processing goals or when it is no longer necessary to attain those goals, unless otherwise provided for by federal law.

5.2 The Company may include subjects' Data in publicly available sources of Data, with the Company taking the subject's written consent to the processing of his Data.

5.3 The Company does not process Data related to race, ethnicity, political views, religious, philosophical and other beliefs, intimate life, membership in public associations, including trade unions.

5.4 The Company may process data on the health status of the Data subject in the following cases:

1) in accordance with the legislation on state social assistance, labor legislation, the legislation of the Russian Federation on state pensions, and on labor pensions;

2) to protect the life, health or other vital interests of the employee or to protect the life, health or other vital interests of others, and obtaining the consent of the Data subject is impossible;

(3) to establish or exercise the rights of the employee or third parties, and also in connection with the exercise of justice;

4) in accordance with the legislation on compulsory types of insurance, with the insurance legislation.

5.5 The Company does not process biometric data (data describing the physiological and biological characteristics of a person which can be used to identify him or her and which are used by the operator to identify the data subject).

5.6 The Company does not transfer Data across borders.

5.7 In cases stipulated by the legislation of the Russian Federation, the Company may transfer Data to third parties (federal tax service, state pension fund and other state bodies) in cases stipulated by the legislation of the Russian Federation.

5.8 The Company is entitled to entrust the processing of Data Subjects to third parties with the consent of the Data Subject, on the basis of a contract to be concluded with such persons.

5.9 Persons processing Data on the basis of an agreement concluded with the Company (commissioned by the Operator) shall be obliged to comply with the principles and rules of Data processing and protection stipulated by the Law. For each third party, the contract shall define the list of actions (operations) with the Data to be performed by the third party processing the Data, the purpose of processing, establish the obligation of such person to ensure the confidentiality and security of the Data when processing it, specify the requirements for the protection of the processed Data in accordance with the Law.

5.10. In order to comply with the requirements of the applicable laws of the Russian Federation and its contractual obligations, the Company shall process Data both with and without the use of automation tools. The set of processing operations includes collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), depersonalization, blocking, deletion, destruction of Data.

5.11 The Company is prohibited from making decisions based solely on the automated processing of Data that produce legal consequences in respect of the Data subject or otherwise affect his rights and legitimate interests, except in cases stipulated by the legislation of the Russian Federation.

**6. Rights and obligations of Data subjects, as well as of the Company in terms of Data processing**

6.1 The subject, whose Data is processed by the Company, has the right:

- receive from the Company:

1) confirmation of the fact of Data processing and information on the availability of Data relating to the relevant Data subject;

2) information on the legal basis and purpose of Data processing;

3) information about the methods used by the Company to process Data;

4) information on the name and location of the Company;

5) information about persons (excluding the Company's employees) who have access to Data or to whom Data may be disclosed on the basis of a contract with the Company or on the basis of federal law;

6) a list of processed Data pertaining to the Data subject and information about the source of its receipt, unless another procedure for providing such Data is stipulated by federal law;

7) information about the term of Data processing, including the term of its storage;

8) information on how the Data subject shall exercise the rights provided for by the Law;

9) the name (full name) and address of the person processing the Data on behalf of the Company;

10) other information as provided by the Law or other regulatory legal acts of the Russian Federation;

- Demand that the Company clarify its Data, block or destroy it if the Data is incomplete, outdated, inaccurate, illegally obtained or unnecessary for the stated purpose of processing;

- Withdraw your consent to the processing of Data at any time;

- Demand elimination of improper actions of the Company in relation to his Data;

- To appeal against the Company's actions or omissions to the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor) or in court if the Data Subject believes that the Company is processing his Data in violation of the requirements of the Law or otherwise violates his rights and freedoms;

- to protect their rights and legitimate interests, including compensation for damages and/or compensation for moral harm in court.

6.2 In processing Data, the Company shall:

- Provide to the Data Subject at his/her request information concerning the processing of his/her Personal Data, or legally refuse to do so within thirty days from the date of receipt of the Data Subject's or his/her representative's request;

- Explain to the Data Subject the legal consequences of a refusal to provide Data if the provision of Data is mandatory under federal law;

- Prior to the commencement of Data processing (if the Data is not received from the Data subject), provide the following information to the Data subject, except in the cases stipulated in Article 18, paragraph 4 of the Law

1) the name or surname, first name, patronymic and address of the Company or its representative;

2) the purpose of data processing and its legal basis;

3) the intended users of the Data;

4) the rights of Data subjects established by law;

5) the source of the Data.

- Take the necessary legal, organizational and technical measures, or ensure their adoption, to protect Data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of Data, as well as from other unlawful acts in relation to Data;

- Publish on the Internet and provide unrestricted access via the Internet to the document defining its policy regarding the processing of Data, information on the implemented requirements for Data protection;

- provide Data subjects and/or their representatives with an opportunity to review Data free of charge upon request within 30 days from the date of receipt of such request;

- Block unlawfully processed Data relating to the Data subject, or ensure its blocking (if the Data processing is carried out by another person acting on behalf of the Company) from the moment of application or receipt of request for the inspection period, in case of detection of unlawful processing of Data upon application of the Data subject or his representative or upon request of the Data subject or his representative or the authorized body for the protection of the rights of personal data subjects;

- Refine the Data or ensure their clarification (if the Data processing is carried out by another person acting on behalf of the Company) within 7 working days from the date of data submission and remove the blocking of Data, if it is confirmed that the Data is inaccurate on the basis of the information provided by the Data subject or his representative;

- Stop the unauthorized processing of Data or ensure the termination of the unauthorized processing of Data by a person acting on behalf of the Company, in case of detection of the unauthorized processing of Data carried out by the Company or a person acting under a contract with the Company, within a period not exceeding 3 working days from the date of this detection;

- Stop processing Data or ensure its termination (if the Data is processed by another person acting under a contract with the Company) and destroy the Data or ensure its destruction (if the Data is processed by another person acting under a contract with the Company) upon achieving the purpose of Data processing, unless otherwise provided by the contract to which the Data subject is a party, beneficiary or guarantor, in case the purpose of Data processing is achieved;

- Stop processing Data or ensure its termination and destroy Data or ensure its destruction if the Data subject withdraws consent to Data processing, if the Company is not entitled to process Data without the consent of the Data subject;

- Keep a log of requests from subjects of Personal Data, which should record the subjects' requests for Data, as well as the provision of Data on these requests.

**7. Data protection requirements**

7.1 When processing Data, the Company shall take the necessary legal, organizational and technical measures to protect Data from unauthorized and/or unauthorized access, destruction, modification, blocking, copying, provision, distribution of Data, as well as from other unlawful acts in relation to Data.

7.2 Such measures under the Act include, but are not limited to:

- Appointment of the person responsible for organizing Data processing and the person responsible for ensuring Data security;

- development and approval of local acts on data processing and protection;

- application of legal, organizational and technical measures to ensure data security:

1) Determination of threats to Data security in the course of its processing in personal data information systems;

2) application of organizational and technical measures to ensure security of Data during its processing in personal data information systems, necessary to meet the requirements for Data protection, implementation of which ensures the levels of Data security established by the Government of the Russian Federation;

3) use of information protection tools that have passed the conformity assessment procedure in accordance with the established procedure;

4) assessment of the effectiveness of measures taken to ensure data security prior to the commissioning of the personal data information system;

5) recording of machine media of Data, if Data is stored on machine media;

6) detecting unauthorized access to Data and taking measures to prevent similar incidents in the future;

7) recovery of Data modified or destroyed as a result of unauthorized access to it;

8) establishment of rules of access to Data processed in the information system of personal data, as well as ensuring registration and recording of all actions performed with Data in the information system of personal data.

- Control over the measures taken to ensure data security and the level of security of personal data information systems;

- Assessment of the harm that may be caused to Data subjects in case of a violation of the requirements of the Law, the ratio of the said harm and the measures taken by the Company to ensure compliance with the obligations stipulated by the Law;

- Compliance with the conditions that prevent unauthorized access to tangible media of Data and ensure the safety of Data;

- familiarization of the Company's employees, directly involved in the processing of Data, with the provisions of the legislation of the Russian Federation on Data, including the requirements for the protection of Data, local regulations on the processing and protection of Data, and training of the Company's employees.

**8. Terms of Data processing (storage)**

8.1 The term of processing (storage) of Data shall be determined based on the purpose of Data processing, in accordance with the term of the contract with the subject of Data, the requirements of federal laws, the requirements of Data operators, on behalf of which the Company carries out Data processing, the basic rules of the archives of organizations, the limitation period.

8.2 Data whose processing (storage) period has expired shall be destroyed, unless otherwise stipulated by federal law. Storage of Data after the termination of its processing is only allowed after its depersonalization.

**9. Procedure for obtaining explanations on data processing issues**

9.1 Persons whose Data is processed by the Company may obtain explanations regarding the processing of their Data by contacting the Company in person or by sending a corresponding written request to the Company's registered office: 115114, Moscow, Derbenevskaya str. Moscow Derbenevskaya street, 20, bldg. 16.

9.2 If an official request is sent to the Company, the text of the request must specify:

- the surname, first name, patronymic of the Data subject or his representative;

- number of the main document certifying the identity of the Data subject or his/her representative, information about the date of issue of the said document and the authority that issued it;

- information confirming that the Data subject has a relationship with the Company;

- information for feedback in order for the Company to respond to the request;

- signature of Data Subject (or his/her representative). If the request is sent electronically, it must be in the form of an electronic document and signed by electronic signature in accordance with the laws of the Russian Federation.

**Closing Provisions**

This Policy is a local regulation of the Company. This Policy is publicly available. Public availability of this Policy is ensured by publishing it on the Company's Website.

This Policy may be revised in any of the following circumstances:

- in case of changes in the legislation of the Russian Federation in the field of processing and protection of personal data;

- in cases where orders have been received from competent governmental authorities to eliminate inconsistencies affecting the scope of the Policy; by decision of the Company's management;

- when changing the purpose and timing of Data processing;

- when changing the organizational structure, structure of information and/or telecommunication systems (or introducing new ones);

- in the application of new technologies of data processing and protection (including transfer, storage);

- If there is a need to change the process of data processing related to the activities of the Company.

If the Company and its employees fail to comply with the provisions of this Policy, they shall be held liable in accordance with the applicable laws of the Russian Federation.

Compliance with the requirements of this Policy is monitored by those responsible for organizing the processing of Company Data, as well as for the security of personal data.