

PERSONAL DATA PROCESSING POLICY

POLICY of a "limited partnership" regarding the processing of personal data. Foreign Company - Limited Partnership, hereinafter referred to as the "Company" establishes the Company's policy regarding the processing of personal data (hereinafter - the "Company Policy"): - individuals, including those who are sole proprietors; - natural persons - beneficial owners of legal entities, or those who have the ability to control the actions of legal entities; - an individual who is the beneficial owner of an individual, unless there is reason to believe that the beneficial owner is another individual. The above persons for the purposes of this Policy of the Company are hereinafter referred to as the "Counterparties" and each of them individually as "Counterparty". "Company" and "Counterparty", including representatives of each of them for the purposes of this Policy of the Company are hereinafter referred to as "Partners".

General Provisions

1. This Policy of the Company regulates relations between the Company and the Counterparties in connection with the processing of their personal data contained in documentary and (or) documentless (electronic) databases using automation tools, including information and communication networks (including the Internet "), Or without the use of such means, if the processing of personal data without the use of such means corresponds to the nature of the actions (operations) performed with personal data using means of automation, that is, it allows to search in accordance with the specified algorithm for the search for personal data recorded on a physical medium and contained in card files or other systematized collections of personal data, and (or) access to such personal data.
2. This Policy of the Company applies to the Company's Counterparties and / or other Counterparties, as well as their representatives.
3. The Company's policy is aimed at ensuring the protection of the rights and freedoms of Partners in the processing of their personal data, including the protection of privacy rights, personal and family secrets of each of them, as well as the confidentiality of this information.
4. This Policy of the Company extends to cases where the processing of personal data of the Counterparties, Partners, allows them, under existing or possible circumstances, to increase revenues, to avoid unjustified expenses, to maintain position in the market for goods, works, services or to obtain other commercial benefits. In this case, with respect to personal data, a regime of their confidentiality shall be introduced, to which commercial secrecy legislation applies.
5. This Company Policy extends to the processing of personal data included in the insider information, as well as if the Personal Data Operator is an insider. The Company's policy is applicable in a part that does not contradict the legislation and other legal acts regulating the procedure for the provision and dissemination of insider information.

Basic concepts

Personal data - any information related to a person (personal data subject) or his representative, directly or indirectly defined or determined, contained in documentary and (or) book-entry (electronic) databases. Personal data processing is any action (operation) or set of actions (operations) performed in an information system using automation tools (personal data processing with the help of computer facilities) or without using such means with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, removal, destruction of personnel data. Cross-border transfer of personal data - the transfer of personal data to the territory of a foreign state to the authority of a foreign state, to a foreign individual or to a foreign legal entity. Personal Data Operator - The Company, its Contractors, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as defining the purposes of processing personal data, the composition of personal data subject to processing, the actions (operations) performed with personal data. The operator of personal data may be a person to whom the Company entrusts the processing of personal data on the basis of a contract concluded with that person. Operators of personal data can not be the Counterparty and its natural persons, as well as third parties who have made illegal or accidental access to personal data, despite the processing of their personal data. Partner's counterparties are individuals, including individual entrepreneurs, who are with the Company in legal relationships on the basis of concluded labor contracts and civil-law contracts, their representatives, as well as individuals specified in paragraphs three and four of the preamble of this Company Policy. Actual threats to the security of personal data are a combination of conditions and factors that create an actual danger of unauthorized access, including accidental access to personal data, when processed in an information system using automation tools, which can result in the destruction, modification, blocking, copying, provision, distribution of personal data, as well as other illegal actions.

Processing of personal data

1. Processing is subject only to personal data, which meet the objectives of their processing.
2. The content and volume of processed personal data must comply with the stated processing objectives. Processed personal data should not be excessive in relation to the stated purposes of their processing.
3. In accordance with the Company's Policy, the processing of personal data is necessary in order to:
 - protection of life, health or other vital interests of the personal data of the Counterparties of Partners, if obtaining their consent is impossible;
 - the execution of a contract to which the Company or the Contractor is the party or the beneficiary or guarantor, including in the case of the Company exercising its right to assign rights (claims) under such agreement, and also to conclude a contract at the initiative of the Company or the Counterparty, or a contract, on which the Company or the Counterparty will be the beneficiary or guarantor;
 - the publication or mandatory disclosure of the personal data of the Counterparties of Partners in accordance with the law;
 - Promoting goods, works, services on the market by making direct contacts with potential Counterparties by means of communication facilities.

4. The processing of personal data must be carried out in a legal and fair manner.
5. Processing of personal data should be limited to the achievement of specific, pre-defined and legitimate purposes. It is not allowed to process personal data incompatible with the purposes of collecting personal data.
6. When processing personal data, the accuracy of personal data, their sufficiency, and, if necessary, the relevance to the purposes of processing personal data should be ensured. The operator of personal data must take the necessary measures or ensure their acceptance for the removal or refinement of incomplete or inaccurate data.
7. Personal data shall be stored by the Company, as well as by the persons specified in subsections 5 and 6 of Article V of the Company's Policies, in documentary and / or electronic forms, for a period of at least 5 years. A longer period of storage of personal data may be established in contracts to which the Counterparty is a party whose beneficiary or guarantor is the Counterparty.
8. Processing of personal data of Partner's Counterparties is carried out with their consent to the processing of such personal data, except for cases provided for by legislation and this Company Policy.
9. The counterparties of the Company express their consent to the processing of their personal data by the Personal Data Operator, with the exception of other Counterparties and their physical persons, as well as third parties as a result of their unauthorized or accidental access to personal data.
10. The operator of personal data, processing personal data on behalf of the Company, is not required to obtain the consent of the Counterparties for the processing of their personal data.
11. If the Company entrusts the processing of personal data to another Personal Data Operator, the Company is liable to the Counterparties for the actions of this person. The operator of personal data processing personal data on behalf of the Company is liable to the Company.

The personal data operator responsible for organizing the processing of personal data, in particular, is obliged:

- to exercise internal control over observance by him and his employees of legislation on personal data, including requirements for the protection of personal data;
- inform the employees of the Personal Data Operator of the provisions of the legislation on personal data, international legal acts, this Company Policy on the processing of personal data, requirements for the protection of personal data;
- Organize reception and processing of requests and requests from the Counterparties or their representatives and (or) monitor the receipt and processing of such requests and requests;
- not transfer to others the fulfillment of obligations assumed in any form.

The counterparty and its natural persons, as well as third parties, who, as a result of unauthorized or accidental access to personal data, can process them, bear legal responsibility to the Company and / or the Personal Data Operator.

Cross-border transfer of personal data

1. The company acts as a resident of a state that is not a party to the Council of Europe Convention on the Protection of Individuals with regard to the automated processing of personal data and may be included in the list of foreign countries that provide adequate protection of the rights of Counterparty Partners, provided that the provisions of this Convention comply with the provisions of the relevant law and the applicable security measures for personal data.
2. Transboundary transfer of personal data for the purposes of this Policy shall be carried out in cases of execution of the contract to which the Counterparty is a party, and also to protect life, health, other vital interests of the Counterparty or third parties in the event that it is impossible to obtain consent in written form of the Counterparty in the cases provided for legislation and this Company Policy.
3. Prior to commencement of cross-border transfer of personal data and in the course of their subsequent processing, the Company guarantees adequate protection of the rights of Counterparties through the following actions:
 - Identification of threats to the security of personal data when processing them in personal data information systems;
 - application of organizational and technical measures to ensure the safety of personal data when processing them in information systems of personal data necessary to meet the requirements for the protection of personal data, the implementation of which provides levels of protection of personal data;
 - the use of procedures that passed in accordance with the established procedure to assess the compliance of information protection means;
 - evaluation of the effectiveness of measures taken to ensure the security of personal data prior to putting into operation the personal information system;
 - taking into account the computer carriers of personal data;
 - Detection of the facts of unauthorized access to personal data and taking measures to eliminate these violations;
 - restoration of personal data, modified or destroyed
 - due to unauthorized access to them;
 - Establishment of rules for access to personal data processed in the personal data information system, as well as ensuring the registration and recording of all actions performed with personal data in the personal information system;
 - control over the measures taken to ensure the security of personal data and the level of security of information systems of personal data.
4. The effect of this article shall apply to the Counterparties of Partners in case of legitimate cross-border transfer of personal data by them. Counterparties of Partners guarantee and take appropriate security measures aimed at preventing accidental or unauthorized destruction of personal data or their accidental loss, as well as preventing unauthorized access to them, changing or disseminating such data in accordance with these requirements established in national legislation and provided for Convention for the Protection of Individuals with regard to the Automated Processing of Personal Data dated 28.01.1981 (the "Convention"), Taking into account the participation of states - members of the Council of Europe, signatories to this Convention. In the event



that the resident state is not a party to the Convention, the Counterparties of the Partners comply with the requirements of this Company Policy.