

PRIVACY POLICY BY IE VERSHNINA MARIA IGOREVNA

1. General provisions

Privacy policy (hereinafter - Policy) is developed in accordance with the Federal Law "On Personal Data" № 152-FL dd. 27.07.2006 (hereinafter - 152-FL).

This Policy defines the procedure of personal data processing and measures to ensure the security of personal data by IE Vershinina Maria Igorevna, registered at 143965, Moscow region, Reutov, prospekt Yubileiny, 48, flt 65 (hereinafter - the Operator) in order to protect the rights and freedoms of individuals and citizens during the processing of his/her personal data, including protection of the rights to privacy, personal life and family secret.

The Policy is strictly enforced by managers and employees of all structural subdivisions and branches of the Operator.

The Policy applies to all personal data of the subjects processed by the Operator with the use of automation and without application of such means.

2. Legal reasons for personal data processing

The Operator's personal data processing policy is determined in accordance with the following normative legal acts:

- Federal Law "On Personal Data" № 152-FL of July 27, 2006;
- Labor Code of the Russian Federation;
- Resolution of the Government of the Russian Federation № 1119 dd. 01.11.2012 "On Approval of the Requirements for the Protection of Personal Data in the Course of Processing";
- Decree of FSTEC of Russia № 55, Russia's FSB security agency № 86, Mininformsvyaz of Russia № 20 "On Approval of the Procedure for Classification of Personal Data Information Systems" dd. February 13, 2008;
- other regulatory legal acts of the Russian Federation and regulatory documents of the state authorities.

3. Definitions

Personal data - any information relating directly or indirectly to a certain or definable natural person (citizen). Such information may include, in particular: full name, year, month, date and place of birth, address, family information, social or property status, information about education, profession, income, information about health status, telephone number, e-mail address, as well as other information.

Operator - a state authority, municipal authority, legal or natural person, independently or jointly with other persons organizing and (or) carrying out processing of personal data, as well as determining the purposes of personal data processing, composition of personal data subject to processing, actions (operations) performed with personal data.

Processing of personal data - any action (operation) or set of actions (operations) with personal data, performed with or without the use of automation tools. Such actions (operations) may include: collection, receipt, recording, systematization, accumulation, storage, clarification

(updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

4. Principles of personal data processing

Processing of personal data by the Operator is carried out on the basis of the following principles:

- legality and fair basis;
- limitation of personal data processing to the achievement of specific, predetermined and legitimate purposes;
- prevention of personal data processing incompatible with the purposes of personal data collection;
- preventing the merging of databases containing personal data processed for incompatible purposes;
- processing only those personal data that meet the purposes of their processing;
- compliance of the content and scope of processed personal data with the stated purposes of processing;
- preventing the processing of personal data that are redundant in relation to the stated purposes of their processing;
- ensuring accuracy, sufficiency and relevance of personal data in relation to the purposes of personal data processing;
- destruction or depersonalization of data upon achievement of the purposes of their processing or in case of loss of necessity in achievement of these purposes, in case of impossibility of elimination by the Operator of the admitted violations of personal data, unless otherwise provided for by the federal law.

5. Conditions of personal data processing

The Operator shall process personal data under at least one of the following conditions:

- personal data processing is performed with the consent of the personal data subject to the processing of his/her personal data;
- the processing of personal data is necessary to achieve the goals stipulated by the international treaty of the Russian Federation or by law, to perform and fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation;
- processing of personal data is necessary for the execution of justice, execution of a judicial act, an act of another authority or an official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;
- processing of personal data is necessary for the execution of an agreement to which the personal data subject is a party or a beneficiary or guarantor, as well as for the conclusion of an agreement at the initiative of the personal data subject or an agreement under which the personal data subject will be a beneficiary or guarantor;

- processing of personal data is necessary for the exercise of rights and legitimate interests of the operator or third parties or for the achievement of socially important purposes, provided that the rights and freedoms of the personal data subject are not violated;
- personal data is processed if it is accessible to an unlimited number of persons by the subject of personal data or at his/her request (hereinafter referred to as publicly available personal data);
- processing of personal data subject to publication or mandatory disclosure in accordance with federal law.

6. Personal data confidentiality

The operator and other persons who have access to personal data are obliged not to disclose to third parties and not to disseminate personal data without the consent of the subject of personal data, unless otherwise provided by federal law.

7. Publicly available sources of personal data

For information support, the Operator may create publicly available sources of personal data of subjects, including directories and address books. Publicly available sources of personal data may include, with the written consent of the data subject, his/her surname, name, patronymic, date and place of birth, position, contact telephone numbers, e-mail address and other personal data provided by the data subject.

Information about the subject shall be excluded from publicly available sources of personal data at any time at the request of the subject or by decision of the court or other authorized state bodies.

8. Assignment of personal data processing to another person

The Operator has the right to entrust personal data processing to another person with the consent of the personal data subject, unless otherwise provided for by federal law, on the basis of a contract concluded with this person. The person performing personal data processing on behalf of the Operator is obliged to comply with the principles and rules of personal data processing stipulated by the Federal Law № 152-FL.

9. Purposes of personal data processing

Processing of personal data by the Operator is carried out for the purposes of:

- conducting personnel management, regulating labor relations with the Operator's employees;
- fulfillment of obligations to provide personal data to state authorities, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Compulsory Medical Insurance Fund, as well as other state authorities;
- preparation, conclusion, execution and termination of contracts with counterparties;
- execution of judicial acts, acts of other bodies or officials subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;
- to exercise the rights and legitimate interests of the Operator within the framework of the activities provided for by the Company charter and other local regulatory acts of the Operator, or third parties, or to achieve socially important goals;

- to ensure efficient and user-friendly operation of the Operator's website cfn.su, where personal data is collected;
- for other lawful purposes.

10. Subjects of personal data

The Operator processes personal data of the following persons:

- employees;
- subjects with whom civil law contracts have been concluded;
- the Operator's clients;
- users registered on the Operator's website cfn.su.

11. List of personal data processed by the Operator

- The list of personal data processed by the Operator is determined in accordance with the legislation of the Russian Federation and local regulatory acts of the Operator, taking into account the purposes of personal data processing specified in p. 9 of the Policy.
- The Operator does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, intimate life.

12. Consent of the personal data subject to the processing of his/her personal data

The subject of personal data decides to provide his/her personal data and consents to their processing freely, of his/her own free will and in his/her own interest. Consent to the processing of personal data may be given by the subject of personal data or his/her representative in any form allowing to confirm the fact of its receipt, unless otherwise provided by the federal law.

13. Rights of the personal data subject

The subject of personal data has the right to receive information from the Operator regarding the processing of his/her personal data, unless such right is restricted in accordance with federal laws. The subject of personal data has the right to demand from the Operator to clarify his/her personal data, block or withdraw it if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as to take measures provided for by law to protect his/her rights.

Processing of personal data for the purpose of promoting goods, works, services on the market by means of direct contacts with potential consumers, as well as for political agitation purposes is allowed only with the prior consent of the personal data subject. The specified processing of personal data is recognized to be carried out without prior consent of the personal data subject, unless the Operator proves that such consent was obtained.

The Operator is obliged to stop processing of personal data for the aforementioned purposes immediately at the request of the subject of personal data.

It is prohibited to make decisions based solely on the automated processing of personal data that give rise to legal consequences in relation to the subject of personal data or otherwise affect his/her rights and legitimate interests, except in cases provided for by federal laws, or with the consent in writing of the subject of personal data.

If the personal data subject believes that the Operator processes his/her personal data in violation of the requirements of the Federal Law № 152-FL or otherwise violates his/her rights and freedoms, the personal data subject has the right to appeal the actions or inactions of the Operator to the Authorized Body for the Protection of the Rights of Personal Data Subjects or in court.

The subject of personal data has the right to protect his/her rights and legitimate interests, including compensation for losses and (or) compensation for moral damage in court.

14. Storage of personal data

The procedure of personal data storage is carried out in a manner that allows the storage of personal data in a form that allows to identify the subject of personal data, no longer than required by the purposes of personal data processing, unless the period of their storage is not established by federal law, contract to which the subject of personal data is a party, beneficiary or guarantor. This procedure corresponds to the principle of personal data processing defined in part 7 of Article 5 of the Federal Law "On Personal Data".

The limiting date of personal data storage is determined by the following:

- legal requirements (civil, labor, tax, pension);
- statute of limitation of mutual claims;
- other regulatory documents.

The retention period of paper material carriers of personal data is determined in accordance with the validity period of the contract with the subject of personal data, the order of the Ministry of Culture of the Russian Federation dd. August 25, 2010 № 558 "On Approval of the List of standard management archival documents formed in the course of activities of state bodies, local governments and organizations, with indication of retention periods", the statute of limitations, as well as other requirements of the legislation.

Or

- Storage of personal data means the existence of records in information systems and on tangible media.
- Personal data are processed and stored in information systems and on paper-based sources of the Operator. Personal data are also stored electronically: in the local computer network of the Operator, in electronic folders and files of employees authorized to process personal data.
- Personal data may be stored for no longer than required for the purposes of processing, unless otherwise is provided by federal laws of the Russian Federation.

15. Final provisions

The Operator reserves the right to make any changes to the Policy at any time at its discretion unilaterally. The changes shall come into force after their publication on the website.