

POLICY FOR PROCESSING PERSONAL DATA



1. PURPOSE AND SCOPE

1.1. This document (hereinafter referred to as the Policy) defines the goals and general principles of personal data processing, as well as the measures taken to protect personal data in DIPO LLC (hereinafter referred to as the Operator).

The policy was developed in accordance with clause 2, part 1 of Art. 18.1 of the Federal Law of July 27, 2006 No. 152-Federal Law "On Personal Data" (hereinafter - the Federal Law "On Personal Data").

The policy contains information to be disclosed in accordance with Part 1 of Art. 14 of the Federal Law "On Personal Data" is a publicly available document of the Operator and provides for the opportunity to familiarize any person with it.

1.2. The policy is valid indefinitely after approval and until it is replaced by a new version.

1.3. The Policy uses terms and definitions in accordance with their meanings, as they are defined in FZ-152 "On Personal Data".

1.4. The policy applies to all employees of the Operator (including employees under labor contracts and employees working under contract contracts) and all structural divisions of the Company, including separate subdivisions. The requirements of the Policy are also taken into account and presented in relation to other persons if it is necessary for their participation in the processing of personal data by the Operator, as well as in cases of transferring personal data to them in the prescribed manner on the basis of agreements, contracts, orders for processing.

2. INFORMATION ABOUT THE OPERATOR

2.1. The operator operates at the address: Samara region, Togliatti, st. North, house 39.

2.2. Responsible for organizing the processing of personal data is the Head of Human Resources and Human Resources of the Company, tel. +7 (8482) 759 628.

2.3. Databases of information containing personal data of citizens of the Russian Federation are located on the territory of the Russian Federation.

3. INFORMATION ABOUT THE PROCESSING OF PERSONAL DATA

3.1. The operator processes personal data in automated and non-automated ways, using computer

technology and without using such means. The operator receives personal data directly from the subjects of personal data.

3.2. Actions with personal data include collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer, including cross-border (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data. To achieve the goals of processing personal data and with the consent of the subjects of personal data, the Operator can carry out cross-border transfer of personal data.

3.3. The Operator processes personal data on a legal and fair basis in order to fulfill the functions, powers and duties assigned by law, to exercise the rights and legitimate interests of the Operator, the Operator's employees and third parties, the legal grounds for processing are:

- The Constitution of the Russian Federation
- Labor Code of the Russian Federation
- Civil Code of the Russian Federation
- Tax Code of the Russian Federation
- Federal law of 27.07.2006. No. 152-FZ "On Personal Data"
- Federal Law of 01.04.1996 No. 27-FZ "On individual (personified) accounting in the compulsory pension insurance system"
- Federal law of 24.07.2009. No. 212-FZ "On insurance contributions to the Pension Fund
- RF, Social Insurance Fund of the RF, Federal Fund of Compulsory Health Insurance and territorial funds of compulsory health insurance "
- Federal law of 22.10.2004. No. 125-FZ "On archival affairs in the Russian Federation"
- Federal Law "On Combating Corruption" dated 25.12.2008 N 273-FZ
- Other applicable laws of the Russian Federation
- Charter of LLC "DIPO"

3.4. The content and volume of processed personal are determined based on the purposes of processing. Personal data that is redundant or incompatible with the following main purposes are not processed: labor relations with individuals (assistance in employment, training and promotion, organization of business trips, ensuring personal safety, monitoring the quantity and quality of work performed, ensuring the safety of property, transferring wages); provision of guarantees and compensations to the Company's employees, both provided for by the legislation of the Russian Federation, and additional, including voluntary medical insurance, medical care and other types of social security; formation of reference, educational, presentation and other materials (corporate newspapers, magazines) for internal information support of the Company's activities, as well as organizations and companies affiliated with the Company, including foreign ones; making a decision on hiring or refusing to hire, forming and maintaining a personnel reserve; preparation, conclusion, execution and termination of contracts with counterparties, fulfillment of the Operator's contractual obligations; observance of the current labor, accounting, pension, and other legislation of the Russian Federation, including the provision of personal data to government bodies, to the Pension Fund of the Russian Federation, to the Social Insurance Fund of the Russian Federation, to the Federal Fund of Compulsory Medical Insurance, as well as to other state bodies; execution of judicial acts, acts of other authorities or officials subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings; verification of information on possible violations received from employees and other persons via the hot line of the Company, and informing the applicant; protection of life, health or other vital interests of subjects of personal data; ensuring access and intra-facility modes at the facilities of the Company; implementation of rights and legitimate interests

of the Company in the framework of the activities provided for by the Charter and other local regulations of the Company, or third parties, or achieving socially significant goals; achieving socially significant goals of creating effective tools to comply with the requirements of the legislation on combating corruption, fraud, legalization (laundering) of proceeds from crime and financing of terrorism; for other lawful purposes.

3.5. The main categories of personal data subjects whose data is processed by the Operator include: individuals who are in labor and civil law relations with the Operator; individuals who are in labor and civil law relations with the contractors of the Operator; candidates for filling vacancies. Other subjects of personal data (to ensure the implementation of the processing purposes specified in clause 3.4. of the Policy)

3.6. For the specified categories of subjects, the following can be processed: surname, name, patronymic; year, month, date of birth; place of birth, address; marital status; social status; property status; education; profession; income; TIN, SNILS, contact information (phone number, e-mail address), and other information with the consent of the subjects of personal data, incl. provided by the standard forms and the established processing procedure.

The list of other personal data processed in the Company is determined in accordance with the legislation of the Russian Federation and local regulations of the Company, taking into account the purposes of processing personal data specified in clause 3.4. Politicians.

The processing of special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, and intimate life is not carried out in the Company.

The operator does not process biometric personal data.

3.7. During processing, the accuracy of personal data is ensured, their sufficiency and relevance in relation to the purposes of processing personal data. If inaccurate or incomplete personal data is found, they are clarified and updated.

3.8. For personal data that is not publicly available, confidentiality is ensured.

3.9. The processing and storage of personal data is carried out no longer than the purpose of processing personal data requires, if there are no legal grounds for further processing, for example, if an appropriate storage period is not established by federal law or an agreement with the subject of personal data. The processed personal data are subject to destruction or depersonalization upon the occurrence of the following conditions:

achievement of the purposes of processing personal data or maximum storage periods - within 30 days; loss of the need to achieve the goals of personal data processing - within 30 days; the provision by the subject of personal data or his legal representative of confirmation that personal data is illegally obtained or is not necessary for the stated purpose of processing - within 7 days; the impossibility of ensuring the legality of the processing of personal data - within 10 days; revocation by the subject of personal data of consent to the processing of personal data, if the storage of personal data is no longer required for the purposes of processing personal data within 30 days; expiration of the statute of limitations for legal relations within the framework of which the processing of personal data is carried out or carried out; liquidation (reorganization) of the Operator.

3.10. The processing of personal data on the basis of contracts and other agreements of the Operator, instructions to the Operator and instructions of the Operator for the processing of personal data is carried out in accordance with the terms of these contracts,

Operator's agreements, as well as agreements with persons who are entrusted with processing or who have entrusted processing legally. Such agreements may govern, inter alia:

purposes, conditions, terms of personal data processing;

obligations of the parties, including measures to ensure confidentiality;

the rights, obligations and responsibilities of the parties regarding the processing of personal data.

3.11. In cases not explicitly provided for by the current legislation or contract, processing is carried out after obtaining the consent of the subject of personal data. Consent can be expressed in the form

of taking actions, accepting the terms of the contract, affixing appropriate marks, filling in fields in forms, forms, or in writing in accordance with the law.

4. MEASURES TO ENSURE THE SECURITY OF PERSONAL DATA

The operator takes the necessary legal, organizational and technical measures to ensure the security of personal data to protect it from unauthorized (including accidental) access, destruction, modification, blocking of access and other unauthorized actions. Such measures include, in particular:

- providing unlimited access to the Policy, a copy of which is posted at the address of the Operator, and can also be posted on the Operator's website;
- appointment of employees responsible for organizing the processing and ensuring the security of personal data;
- inclusion, if necessary, in contracts of clauses on ensuring the confidentiality of personal data;
- issuing local acts on the processing of personal data, familiarizing employees with them;
- ensuring the physical security of premises and processing facilities, access control, security, video surveillance;
- restriction and differentiation of access of employees and other persons to personal data and processing means, monitoring of actions with personal data;
- identification of threats to the security of personal data during their processing, the formation of threat models on their basis;
- application of security tools (anti-virus tools, firewalls, means of protection against unauthorized access, means of cryptographic protection of information), including those that have passed
- the conformity assessment procedure in accordance with the established procedure;
- accounting and storage of information carriers, excluding their theft, substitution, unauthorized copying and destruction;
- backup of information for the possibility of recovery;

implementation of internal control over compliance with the established procedure, verification of the effectiveness of measures taken, response to incidents.

5. RIGHTS OF SUBJECTS OF PERSONAL DATA

5.1. The subject of personal data has the right to withdraw consent to the processing of personal data by sending a request to the Operator by mail or by contacting in person.

5.2. The subject of personal data has the right to receive information regarding the processing of his personal data, including containing:

- confirmation of the fact of personal data processing by the Operator;
- legal grounds and purposes of personal data processing;
- the purposes and methods of processing personal data used by the Operator;
- the name and location of the Operator, information about persons (with the exception of employees / employees of the Operator) who have access to personal data or to whom

personal data may be disclosed on the basis of an agreement with the Operator or on the basis of federal law;

- processed personal data relating to the relevant subject of personal data, the source of their receipt, unless another procedure for submitting such data is provided for by federal law;
- terms of processing personal data, including the terms of their storage;
- the procedure for the exercise by the subject of personal data of the rights provided for by the Federal Law "On Personal Data";
- information on the performed or expected cross-border data transfer;
- name or surname, first name, patronymic and address of the person who processes personal data on behalf of the Operator, if the processing is entrusted or will be entrusted to such a person;
- other information provided for by the Federal Law "On Personal Data" or other federal laws.

5.3. The subject of personal data has the right to demand that the Operator clarify his personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as take measures provided for by law to protect their rights.

5.4. If the subject of personal data believes that the Operator is processing his personal data in violation of the requirements of the Federal Law "On Personal Data" or otherwise violates his rights and freedoms, the subject of personal data has the right to appeal against the actions or inaction of the Operator to the authorized body for the protection of the rights of subjects of personal data or in court.

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

6. RESPONSIBILITY

6.1. . The rights and obligations of the Operator are determined by the current legislation and agreements of the Operator.

6.2. Control over the fulfillment of the requirements of this Policy is carried out by the person responsible for organizing the processing of the Operator's personal data within the limits of their authority. Responsible for organizing the processing of personal data is the Head of Human Resources and Human Resources of the Company,

6.3. The responsibility of persons participating in the processing of personal data on the basis of instructions from the Operator for the unlawful use of personal data is established in accordance with the terms of a civil agreement concluded between the Operator and the counterparty or the Information Confidentiality Agreement.

6.4. Persons guilty of violating the rules governing the processing and protection of personal data bear material, disciplinary, administrative, civil or criminal liability in the manner prescribed by federal laws, local acts, agreements of the Operator.

6.5. The policy is put into effect after approval by the head of the Operator. The policy is reviewed annually to keep it up to date and updated as necessary.