

JSC "PLASMA"
PERSONAL DATA PROCESSING POLITICS

1. General provisions

The Personal Data Processing Policy (hereinafter referred to as the Policy) has been developed in accordance with Federal Law No. 152-FL of 27.07.2006 "On Personal Data" (hereinafter referred to as FL — 152).

This Policy defines the procedure for processing personal data and measures to ensure the security of personal data in JSC "Plasma" (location: 390023, Ryazan, Tsiolkovsky str., house No. 24, INN 6230005886, OGRN 1026201102850) (hereinafter — the Operator) in order to protect the rights and freedoms of a person and a citizen when processing his personal data, including the protection of the rights to privacy, personal and family secrets.

This Operator's policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator can receive about website visitors <http://www.plasmalabs.ru/> and <http://www.plasmalabs.com/>

The following basic concepts are used in the Policy:

- **automated processing of personal data** — processing of personal data using computer technology;
- **blocking of personal data** — temporary termination of the processing of personal data (except in cases where the processing is necessary to clarify personal data);
- **website** – a set of graphic and informational materials, as well as computer programs and databases that ensure their availability on the Internet at a network address <http://www.plasmalabs.ru/> and <http://www.plasmalabs.com/>;
- **personal data information system** — a set of personal data contained in databases and information technologies and technical means that ensure their processing;
- **depersonalization of personal data** — actions as a result of which it is impossible to determine the identity of personal data to a specific personal data subject without using additional information;
- **personal data processing** — any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;
- **operator** — a state body, a municipal body, a legal entity or an individual who independently or jointly with other persons organize and (or) carry out the processing of personal data, as well as determine the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data;

- **user** – any visitor to the website <http://www.plasmalabs.ru/> and <http://www.plasmalabs.com/>;
- **provision of personal data** — actions aimed at disclosing personal data to a certain person or a certain circle of persons;
- **dissemination of personal data** — actions aimed at disclosure of personal data to an indefinite circle of persons (transfer of personal data) or at familiarization with personal data of an unlimited circle of persons, including the publication of personal data in the mass media, placement in information and telecommunications networks or providing access to personal data in any other way;
- **cross-border transfer of personal data** — transfer of personal data to the territory of a foreign state to a foreign state authority, a foreign individual or a foreign legal entity;
- **destruction of personal data** — actions as a result of which it is impossible to restore the content of personal data in the personal data information system and (or) as a result of which the material carriers of personal data are destroyed.

The Company is obliged to publish or otherwise provide unrestricted access to this Personal Data Processing Policy in accordance with Part 2 of Article 18.1 of Federal Law 152.

2. The concept and composition of personal data

2.1. For the purposes of this Policy, personal data means any information related directly or indirectly to a certain individual (subject of personal data).

2.2. Depending on the subject of personal data, the Organization may process personal data of the following categories of subjects in order to carry out its activities and fulfill its obligations:

- personal data of an employee of the Organization, former employees, candidates for work, as well as relatives of employees — information necessary for the Organization in connection with labor relations and concerning a specific employee
- customer data — information required by the Organization to fulfill its obligations under the contractual relationship with the Customer and to comply with the requirements of the legislation of the Russian Federation. This also includes data provided by potential clients, client representatives authorized to represent clients; managers and chief accountants of legal entities that are clients of the Organization, persons who have concluded civil law contracts with the Organization for the provision of services to the Organization; employees of the Organization's partners and other legal entities that have contractual relations with the Organization, with which the Organization's employees interact within the framework of their activities;
- personal data of other individuals who have expressed consent to the processing of their personal data by the Organization or the data of individuals whose personal data

processing is necessary for the Organization to achieve the goals provided for by the legislation of the Russian Federation.

2.3. The subject of personal data falling into the list of persons specified in clause 2.2, the client of the organization agrees to the processing of the following personal data: surname, first name, patronymic; date of birth; postal addresses (at the place of registration and for contacts); information about citizenship; number of the main identity document of the Customer, information about the date of issue of the specified document and the issuing authority; phone numbers; E-mail addresses (E-mail).

3. Principles and conditions of personal data processing

3.1. Principles of personal data processing

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

- legality and fair basis;
- restrictions on the processing of personal data to achieve specific, predetermined and legitimate goals;
- preventing the processing of personal data that is incompatible with the purposes of collecting personal data;
- preventing the integration of databases containing personal data, the processing of which is carried out for purposes incompatible with each other;
- processing only personal data that meet the purposes of its processing;
- compliance of the content and volume of the processed personal data with the stated processing purposes;
- preventing the processing of personal data that is excessive in relation to the stated purposes of its processing;
- ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of personal data processing;
- destruction or depersonalization of personal data upon achievement of the purposes of their processing or in case of loss of the need to achieve these goals, if it is impossible for the Operator to eliminate the violations of personal data, unless otherwise provided by federal law.

3.2. Terms of personal data processing

The operator processes personal data in the presence of at least one of the following conditions:

- the processing of personal data is carried out with the consent of the personal data subject to the processing of his personal data;
- the processing of personal data is necessary to achieve the goals stipulated by an international agreement of the Russian Federation or a law, to perform and fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation;
- the processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another body or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;
- the processing of personal data is necessary for the execution of a contract to which the personal data subject is a party or a beneficiary or guarantor, as well as for the conclusion of a contract on the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor;
- the processing of personal data is necessary to exercise the rights and legitimate interests of the operator or third parties or to achieve socially significant goals, provided that the rights and freedoms of the personal data subject are not violated;
- personal data is processed, access to which is provided by the subject of personal data to an unlimited number of persons or at his request (hereinafter referred to as publicly available personal data);
- personal data subject to publication or mandatory disclosure in accordance with federal law is processed.

3.3. Confidentiality of personal data

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

3.4. Assignment of personal data processing to another person

The operator has the right to 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 this person. A person who processes personal data on

behalf of the Operator is obliged to comply with the principles and rules for processing personal data provided for by FL-152 and this Policy

3.5. Processing of personal data of citizens of the Russian Federation

In accordance with Article 2 of Federal Law No. 242-FL of 21.07.2014 "On Amendments to Certain Legislative Acts of the Russian Federation in Terms of clarifying the procedure for processing personal Data in information and Telecommunications networks" , when collecting personal data, including through the Internet information and telecommunications network, the operator is obliged to record, systematize, accumulate, store, clarify (update, change), extract personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except for the following cases:

- the processing of personal data is necessary to achieve the goals stipulated by an international agreement of the Russian Federation or a law, to perform and fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation;
- the processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another body or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings (hereinafter referred to as the execution of a judicial act);
- the processing of personal data is necessary for the performance of the powers of federal executive bodies, bodies of state extra-budgetary funds, executive bodies of state power of the subjects of the Russian Federation, local self-government bodies and the functions of organizations involved in the provision of state and municipal services, respectively, provided for by Federal Law No. 210-FL of 27.07.2010 "On the Organization of the Provision of State and Municipal Services", including the registration of the subject of personal data on the unified portal of state and municipal services and (or) regional portals of state and municipal services;
- the processing of personal data is necessary for the professional activities of a journalist and (or) the legitimate activities of the mass media or scientific, literary or other creative activities, provided that the rights and legitimate interests of the subject of personal data are not violated.

3.6. Cross-border transfer of personal data

The operator is obliged to make sure that the foreign state to whose territory the transfer of personal data is supposed to be carried out provides adequate protection of the rights of personal data subjects before the start of such transfer. The cross-border transfer of personal data on the territory of foreign states that do not provide adequate protection of the rights of personal data subjects may be carried out in the following cases:

- the written consent of the personal data subject to the cross-border transfer of his personal data;
- execution of the contract to which the subject of personal data is a party.

4. Rights of the personal data subject

4.1. Consent of the personal data subject to the processing of his personal data

The subject of personal data makes a decision on the provision of his personal data and gives consent to their processing freely, of his own will and in his own interests. Consent to the processing of personal data may be given by the personal data subject or his representative in any form that allows confirming the fact of its receipt, unless otherwise established by federal law.

4.2. Rights of the personal data subject

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

The processing of personal data for the purpose of promoting goods, works, services on the market by making direct contacts with the subject of personal data (potential consumer) using means of communication, as well as for the purposes of political campaigning is allowed only with the prior consent of the subject of personal data.

The operator is obliged to immediately terminate, at the request of the personal data subject, the processing of his personal data for the above-mentioned purposes.

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

If the personal data subject believes that the Operator processes his personal data in violation of the requirements of Federal Law 152 or otherwise violates his rights and freedoms, the personal data subject has the right to appeal the actions or omissions 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 rights and legitimate interests, including compensation for losses and (or) compensation for moral damage.

5. Ensuring the security of personal data

The security of personal data processed by the Operator is ensured by the implementation of legal, organizational and technical measures necessary to meet the requirements of federal legislation in the field of personal data protection.

To prevent unauthorized access to personal data, the Operator applies the following organizational and technical measures:

- appointment of officials responsible for organizing the processing and protection of personal data;
- restriction of the number of persons allowed to process personal data;
- familiarization of subjects with the requirements of federal legislation and regulatory documents of the Operator for the processing and protection of personal data;
- organization of accounting, storage and circulation of media containing information with personal data;
- identification of threats to the security of personal data during their processing, the formation of threat models based on them;
- development of a personal data protection system based on the threat model;
- checking the readiness and effectiveness of the use of information security tools;
- differentiation of users' access to information resources and software and hardware means of information processing;
- registration and accounting of actions of users of personal data information systems;
- using anti-virus tools and personal data protection system recovery tools;
- using inter-network shielding, intrusion detection, security analysis and cryptographic protection of information, if necessary;
- organization of access control to the Operator's territory, protection of premises with technical means of personal data processing.

6. Final provisions

Other rights and obligations of the Operator in connection with the processing of personal data are determined by the legislation of the Russian Federation in the field of personal data.

Employees of the Operator who are guilty of violating the norms governing the processing and protection of personal data bear material, disciplinary, administrative, civil or criminal liability in accordance with the procedure established by federal laws.