

Approved
General Director
TimeWeb Co. Ltd
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TIMEWEB Co. Ltd PERSONAL DATA PROCESSING POLICY

Saint-Petersburg

This Personal Data Processing Policy (hereinafter referred to as the Policy) is developed in accordance with the Constitution of the Russian Federation, the Convention for the Protection of Individuals during Automated Personal Data Processing ET8 No. 108 dated 28/01/1981, the Civil Code of the Russian Federation, Federal Act dated 27/07/2006 No. 152-FZ "On Personal Data" (hereinafter referred to as the Law), Federal Act dated 27/07/2006 No. 149-FZ "On Information, Information Technologies and Information Protection", Federal Act dated 07/07/2003 No. No. 126-FZ "On Communications", and other regulatory legal acts of the Russian Federation.

This Policy defines the procedure for processing and guarantees of ensuring personal data protection in TimeWeb Co. Ltd (hereinafter referred to as the Operator) in order to protect the rights and freedoms of a person and citizen when processing his/her personal data.

1. DEFINITION OF TERMS

1.1. Basic Policy terms:

1.1.1. Personal data refers to any information relating directly or indirectly to specific or determined individual (the personal data subject):

1.1.2. Operator refers to a state body, municipal body, legal or natural person, independently or jointly with other persons organizing and/or processing personal data, as well as determining the purposes of personal data processing, the content of personal data to be processed, actions (operations) with personal data;

1.1.3. Personal data processing means any action or set of actions taken with automation tools or without them, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;

1.1.4. Automated personal data processing means processing of personal data using computer equipment;

1.1.5. Distribution of personal data means actions aimed at disclosing personal data to an undetermined number of persons.

1.1.6. Provision of personal data means actions aimed at disclosing personal data to a certain person or a certain set of persons;

1.1.7. Personal data blocking means temporary personal data processing suspension (unless processing is necessary to clarify personal data);

1.1.8. Destruction of personal data means actions that result in the impossibility of restoring the content of personal data in the personal data information system and (or) result in destruction of the personal data physical media;

1.1.9. Depersonalization of personal data means actions that make it impossible to determine the ownership of personal data to a specific subject of personal data without the use of additional information;

1.1.10 Personal data information system means a set of personal data contained in databases, and information technologies and technical means ensuring their processing.

1.1.11. Cross-border transfer of personal data means 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.

2. PRINCIPLES AND TERMS OF PERSONAL DATA PROCESSING

2.1. Principles of personal data processing

2.1.1. The Operator shall process the personal data on the basis of the following principles:

- Legality and fair basis;
- Restrictions on personal data processing by achieving specific, predetermined and legitimate goals;
- Preventing personal data processing incompatible with the purposes of collecting personal data;
- Preventing the unification of databases containing personal data to be processed for purposes incompatible with each other;
- 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 processing of personal data that is redundant in relation to the stated purposes of their 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 purposes, if it is impossible for the Operator to eliminate violations of personal data, unless otherwise provided by federal law.

2.2. Terms of personal data processing

2.2.1. The Operator shall process personal data if at least one of the following conditions is met:

- personal data is processed with the consent of the personal data subject to the processing of their personal data;
- personal data processing is necessary to achieve the goals provided for by an international treaty of the Russian Federation or by law for the implementation and execution of the functions, powers and duties imposed by the legislation of the Russian Federation on the Operator;
- personal data processing 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);
- personal data processing is necessary for the performance of an agreement to which the personal data subject is a party, a beneficiary or a guarantor, as well as for concluding an agreement on the initiative of the personal data subject or an agreement under which the personal data subject will be a beneficiary or a guarantor;
- personal data processing is necessary to protect the life, health or other vital interests of the personal data subject, if it is impossible to obtain the consent of the personal data subject;
- personal data processing is necessary to exercise the rights and legitimate interests of the Operator or third parties, or to achieve socially significant goals, provided that this does not violate the rights and freedoms of the personal data subject;
- personal data processing is necessary for scientific, literary or other creative activities, provided that this does not violate the rights and legitimate interests of the personal data subject;
- personal data is processed for statistical or other research purposes with the exception of the purposes specified in Article 15 of the Law, subject to the mandatory depersonalization of personal data;
- personal data is processed with the access to it of an unlimited number of persons provided by the personal data subject or at their request (hereinafter referred to as personal data made publicly available by the personal data subject);

- personal data is processed subject to publication or mandatory disclosure in accordance with federal law of the Russian Federation.

2.3. Personal data confidentiality.

2.3.1. The Operator and other persons who have gained access to personal data shall not disclose to third parties and shall not distribute personal data without the consent of the personal data subject unless otherwise provided by federal law.

2.3.2. The Operator shall have the right to transfer personal data to the bodies of inquiry and investigation as well as other authorized bodies on the grounds provided for by the applicable legislation of the Russian Federation.

2.4. Publicly available sources of personal data.

2.4.1. For the purpose of information support publicly available sources of personal data (including directories, address books) may be created. With the written consent of the personal data subject, publicly available sources of personal data may include their last name, first name, patronymic, year and place of birth, address, subscriber number, information about the profession and other personal data provided by the personal data subject.

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

2.5. Special categories of personal data, as well as biometric personal data, shall not be not processed by the Operator.

2.6. Assignment of personal data processing to a third (other) party.

2.6.1. The Operator shall have the right to assign personal data processing to another person, including one located outside the Russian Federation (cross-border transfer of personal data), with the consent of the personal data subject, unless otherwise provided by federal law, on the basis of an agreement concluded with this person. A person who processes personal data on behalf of the Operator shall comply with the principles and rules for processing personal data provided for by the Law. The Operator's assignment shall define a list of actions (operations) with personal data that will be performed by the person processing personal data, and the purposes of processing, establish the obligation of such a person to maintain personal data confidentiality and ensure personal data security during processing, and also specify the requirements for protection of processed personal data in accordance with Article 19 of the Law. Cross-border transfer of personal data shall be effected in order to fulfill the rights and obligations under contracts concluded with the personal data subjects, including for the purpose of marketing research, for advertising and information purposes, as well as to ensure compliance with laws and other regulatory legal acts.

2.6.2. The person processing personal data on the Operator's assignment shall not obtain the consent of the personal data subject to process his/her personal data.

2.6.3. In the event that the Operator entrusts personal data processing to another person, the Operator shall be responsible to the personal data subject for the actions of this person. The person who processes personal data on behalf of the Operator shall be responsible to the Operator.

2.7. Purpose of personal data processing.

2.7.1. Personal data may be processed by the Operator solely for the purpose of fulfilling the rights and obligations under contracts concluded with the subjects of personal data, ensuring compliance with laws and other regulatory legal acts, as well as in order to comply with other legitimate interests of the Operator or the personal data subjects.

2.7.2. Personal data shall be collected and used to the extent that it is justified by the purpose of processing

such personal data. The Operator shall look for ways and methods to use exclusively anonymized personal data to the extent and at the degree justified by the purposes of processing personal data.

2.7.3. Achieving the purposes of processing personal data may be a condition for terminating personal data processing.

2.8. Regardless of the existing judicial practice and explanations of the authorized bodies, the Operator shall refer the following information to (but not limited to) personal data:

- personal and biographical data;
- data that allows identifying the subject or their terminal equipment (cookies, web beacons, pixel tags, IP addresses, information about the browser or other software that accesses the display of advertising) and other digital marking technologies;
- other personal data.

3. RIGHTS OF THE PERSONAL DATA SUBJECT

3.1. Consent of the personal data subject to personal data processing.

3.1.1. The personal data subject shall decide to provide their personal data and consent to its processing freely, of their own will and in their interest. Consent to personal data processing shall be specific, informed and conscious. Consent to personal data processing can be provided by the personal data subject or their representative in any form enabling to confirm the fact of its receipt, unless otherwise provided by the federal law. In case of the consent to personal data processing from a representative of the personal data subject, the Operator shall check the powers of the representative to consent on behalf of the personal data subject.

3.1.2. Consent to personal data processing may be withdrawn by the personal data subject. If the personal data subject withdraws consent to personal data processing, the Operator shall have the right to continue processing personal data without the consent of the personal data subject if there are grounds specified in paragraphs 2-11, part 1, article 6, part 2, article 10 of the Law.

3.1.3. The obligation to provide proof of obtaining the consent of the personal data subject to their personal data processing or proof of the existence of the grounds specified in paragraphs 2-11 part 1, article 6, part 2, article 10 of the Law shall rest with the Operator.

3.2. Rights of the personal data subject.

3.2.1. The personal data subject shall have the right to receive information from the Operator regarding their personal data processing if such a right is not limited in accordance with federal laws.

3.2.2. The personal data subject shall have the right to demand that the Operator clarify their personal data, block it or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as take measures prescribed by law to protect their rights.

3.2.3. Personal data processing in order to promote goods, works, services in the market by direct contacts with a potential consumer using communication means, as well as for the purpose of political campaigning, shall be allowed only with the prior consent of the personal data subject. The above personal data processing shall be recognized as effected without the prior consent of the personal data subject unless the Operator proves that such consent has been obtained.

3.2.4. At the request of the personal data subject, the Operator shall immediately stop processing their personal data for the above purposes.

3.2.5. It is forbidden to make decisions on the basis of solely automated personal data processing that give rise to legal consequences in relation to the personal data subject or otherwise affect their rights and legitimate interests, with the exception of cases provided for by federal laws or with the consent of the personal data subject in writing.

3.2.6. If the personal data subject believes that the Operator is processing their personal data in violation of the Law or otherwise violates their rights and freedoms, the personal data subject shall have the right to appeal against the actions or inaction of the Operator to the authorized body for the protection of the rights of personal data subjects or to court.

3.2.7. The personal data subject shall have the right to protect their rights and legitimate interests, including compensation for damages and/or compensation for moral damage in court.

4. PERSONAL DATA SECURITY

4.1. Security of personal data processed by the Operator is ensured by implementing the legal, organizational, and technical measures necessary to meet the requirements of the federal legislation in personal data protection.

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

- appointment of officials responsible for organizing the personal data processing and protection;
- limiting the number of persons with access to personal data;
- familiarization of personal data subjects with the requirements of federal legislation and with this Operator's Policy on personal data processing and protection;
- organization of accounting, storage and circulation of information carriers;
- identification of threats to the personal data security during their processing, building threat models on their basis;
- development of a personal data protection system based on threat models;
- checking readiness and effectiveness of the use of information security tools;
- delimitation of user access to information resources and information processing software and hardware;
- registering and accounting actions of users of personal data information systems;
- use of anti-virus tools and means of restoring the personal data protection system;
- use of firewalling, intrusion detection, security analysis and cryptographic information security tools, if necessary.

5. FINAL PROVISIONS

5.1. Other rights and obligations of the Operator as a personal data operator shall be determined by the legislation of the Russian Federation in the field of personal data.

5.2. The Operator's officials guilty of violating the rules governing personal data processing and protection shall bear material, disciplinary, administrative, civil or criminal liability in the manner prescribed by federal laws.

5.3. This Policy may be changed by the Operator, taking into account the changing requirements of the legislation, as well as the development of organizational and technical measures for personal data protection. Changes to the text hereof shall be effected by replacing the current edition posted on the information and telecommunications network Internet, with a new edition or publication of changes hereto.