




**Personal Data Processing Policy
(FENSMA LLC)**

P-PDPP3-2.4.1-2022

Revision 3

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Approved by
Director General
of FENSMA LLC
V. S. Chernykh

June 23, 2022



At the time of approval of the Personal Data Processing Policy, there is no elected body of the local trade union organization

Personal Data Processing Policy **(FENSMA LLC)**

P-PDPP3-2.4.1-2022

Revision 3

Developed by:

Head of HR
Administration Department
of FENSMA LLC

 S. B. Ruzanova

June 23, 2022

Moscow 2022

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Foreword

1. DEVELOPED AND INTRODUCED by the Head of HR Administration Department of FENSMA LLC.
2. APPROVED and ENACTED by Director General of FENSMA LLC on June 23, 2022.
3. Compliant with the requirements of GOST R ISO 9001-2015;
4. INTRODUCED TO REPLACE the Operator's Personal Data Processing Policy of FENSMA LLC (Revision 2).

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1. Purpose and Scope

1.1 This Personal Data Processing Policy was developed in accordance with the Federal Law of 27.07.2006 No. 152-FZ On Personal Data in order to protect the rights and freedoms of individuals and citizens in processing of their personal data, including protection of the rights to privacy, personal and family secrecy.

1.2 FENSMA Limited Liability Company, in the course of fulfillment of the requirements of the Federal Law of 27.07.2006, No. 152-FZ 'On Personal Data' and based on the recommendations of Roskomnadzor to draw up a document defining the operator's personal data processing policy, as prescribed by the Federal Law of 27.07.2006 No. 152-FZ 'On Personal Data', and publishes to be publicly available on the website of FENSMA LLC (<https://fensma.ru>, <https://fensma.com>) the Personal Data Processing Policy and information on the implemented requirements for the protection of personal data.

1.3 This Personal Data Processing Policy is interrelated with the following Company Standards:

1.3.1 Regulations on Processing and Protection of Employee Personal Data

1.3.2 Rules of Internal Labor Regulations of the Company

1.4 The effect of this Personal Data Processing Policy applies to all personal data processed by FENSMA LLC, including those received from visitors of the website <https://fensma.ru>, <https://fensma.com>.

1.5 This Personal Data Processing Policy is mandatory for familiarization and execution by all employees of FENSMA LLC.

2. Regulatory References

2.1 The following regulatory documents are referenced in this Policy with regard to the processing of personal data:

2.1.1 Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data'

2.1.2 Recommendations on drafting a document defining the operator's personal data processing policy in accordance with the procedure established by the Federal Law dated July 27, 2006 No. 152-FZ 'On Personal Data'

2.1.3 Labor Code of the Russian Federation

2.1.4 Civil Code of the Russian Federation.

2.1.5 Tax Code of the Russian Federation

2.1.6 Federal Law No. 14-FZ 'On Limited Liability Companies' dated 08.02.1998

2.1.7 Order of the Federal Service for Supervision of Communications, Information Technologies and Mass Media of 15.03.2013 No. 274 'On Approval of the List of Foreign States That Are Not Parties to the Convention of the Council of Europe on Protection of Individuals with Regard to Automatic Processing of Personal Data and Ensure Adequate Protection of the Rights of Personal Data Subjects'.

3. Terms and Definitions

Abbreviation	Meaning of Abbreviation
FENSMA LLC	FENSMA Limited Liability Company
INN	Taxpayer identification number
IRD	Internal regulatory document
MDS Department	Management Documentation Support Department
PD	Personal data

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PD Operator	Company (FENSMA LLC)
Policy	Personal Data Processing Policy
RLD	Regulatory legal document
Definition	Explanation
Authorized representative	Employee of the Company, endowed with the relevant powers on conclusion of employment contracts, supplementary agreements to the labor contracts, issue and signing of employment orders, transfer to another position and any other orders and HR documents specified in the Power of Attorney.
Automated processing of personal data	Processing of personal data by means of computing equipment
Blocking of personal data	Temporary cessation of personal data processing (except for cases when processing is necessary to clarify personal data)
Company	FENSMA Limited Liability Company (FENSMA LLC) (all business and standalone units, construction facilities, areas)
Confidentiality of personal data	Mandatory requirement for the operator or other person who has access to personal data not to allow its dissemination without the consent of the personal data subject or other legal basis
Counterparty	Party to a civil law contract to whom the holder of information constituting a trade secret has communicated that information
Cross-border transfer of personal data	Transfer of personal data to the territory of a foreign state to a foreign authority, a foreign individual or a foreign legal entity
Depersonalization of personal data	Actions, as a result of which it becomes impossible to determine belonging of personal data to a particular personal data subject without using additional information
Destruction of personal data	Actions, as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which material carriers of personal data are destroyed
Dissemination of personal data	Actions aimed at disclosure of personal data to an indefinite number of persons
Document	Material carrier with information recorded on it in any form in the form of text, sound recordings, images and (or) a combination thereof, which has requisites that allow identifying it, and is intended for transmission in time and space for public use and storage
Employee	Individual who has entered into employment relations with the Company
Former employee	Individual with whom an employment contract previously concluded between the Company and the Employee has been terminated
Information	Any data, regardless of its form of presentation
Information system	System designed to store, search and process information, and appropriate organizational resources (human, technical, financial, and so on) that provide and distribute information
Internal regulatory document	Document containing labor law regulations, which is accepted by the Company within its competence in accordance with laws and other regulatory legal documents, agreements
Obtaining of personal data	Provision of personal data about oneself by the personal data subject or a third party

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Personal data	Any information directly or indirectly related to the personal data subject – a specific or identifiable individual, as well as the user of the website https://fensma.ru , https://fensma.com
Personal data authorized by the personal data subject for dissemination	Personal data, access to which is provided by the personal data subject to an unlimited number of persons by giving consent to personal data processing, authorized by the personal data subject for dissemination in the manner prescribed by the laws of the Russian Federation
Personal data information system	Aggregate of personal data contained in databases and information technologies and technical means ensuring its processing
Personal data operator	FENSMA LLC independently or together with other persons organizing or carrying out personal data processing, as well as determining the purposes of personal data processing, composition of personal data subject to processing, actions and operations performed with personal data
Personal data processing	Any action (operation) or set of actions (operations) performed with or without the use of automation means 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
Personal data subject	Defined or identifiable individual
Provision of personal data	Actions aimed at disclosure of personal data to a certain person or a certain circle of persons
Retaining of personal data	Ensuring conditions that prevent loss or misuse of personal data
Use of personal data	Dissemination, provision and other application of personal data in accordance with the purposes that determined its receipt
User	Any visitor to the website https://fensma.ru , https://fensma.com
Website	Set of graphic and information materials, as well as computer programs and databases that ensure its availability on the Internet at a network address https://fensma.ru , https://fensma.com

4. General Provisions

4.1 PD subjects have the right to:

4.1.1 obtain information regarding processing of his/her personal data, except for cases provided for by federal laws;

4.1.2 demand from the Operator to clarify his/her Personal Data, block or destroy it if they are 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;

4.1.3 impose a condition of prior consent when processing personal data for the purpose of marketing goods and services;

4.1.4 appeal to Roskomnadzor or in court against unlawful acts or omissions of the Operator in PD processing;

4.1.5 have access to their PD;

4.1.6 providing information on the availability of PD in an accessible form, without PD relating to other PD subjects, except in cases where there are legal grounds for disclosure of such PD.

4.2 PD subjects are obliged to:

4.2.1 provide the Operator with true information about himself/herself;

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4.2.2 inform the Operator about the clarification (update, change) of his/her personal data;

4.3 The operator has the right to:

4.3.1 independently determine the composition and list of measures necessary and sufficient to ensure fulfillment of the obligations stipulated by the PD laws and RLD adopted in accordance with it, unless otherwise provided for by other federal laws;

4.3.2 entrust personal data processing to another person with the consent of the data subject, unless otherwise provided for by federal laws, on the basis of a contract concluded with that person;

4.3.3 receive from the personal data subject reliable information and/or documents containing personal data;

4.3.4 send to the Website User notifications of new products and services, special offers and various events. The User can always unsubscribe from receiving informational messages by sending a letter to the Operator to the e-mail address feedback@fensma.ru with the note 'Opting out of notifications about new products, services, and special offers'.

4.3.5 in case the PD subject revokes his/her consent to personal data processing, the Operator has the right to continue personal data processing without the consent of the PD subject if there are grounds specified in the Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data'.

4.4 The operator is obligated to:

4.4.1 organize processing of PD in accordance with the requirements of Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data';

4.4.2 respond to appeals and inquiries from PD subjects and their legal representatives;

4.4.3 provide the personal data subject, upon his/her request, with information regarding processing of his/her personal data;

4.4.4 take legal, organizational and technical measures to protect personal data from unlawful or accidental access to it, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unlawful actions in relation to personal data;

4.4.5 cease transfer (dissemination, provision, access) of personal data, stop processing and destroy personal data in the manner and cases stipulated by the laws of the Russian Federation;

4.4.6 report to the authorized body for protection of the rights of PD subjects (Federal Service for Supervision of Communications, Information Technology and Mass Media - Roskomnadzor), upon request of this authority, the necessary information within 30 days from the date of receipt of such request.

4.5 All information specified in this Policy is based on the requirements of Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data', by-laws and the Regulations on Processing and Protection of Employee Personal Data approved by the Company.

5. Purposes of Personal Data Collection

5.1 PD processing is limited to the achievement of specific, predetermined and legitimate purposes. PD processing incompatible with the purpose of collecting PD is not allowed.

5.2 The Company processes PD in compliance with legal requirements and solely for the purpose of:

5.2.1 carrying out its activities in accordance with the Charter of FENSMA LLC;

5.2.2 assistance in employment, formalization of labor relations, education and promotion, control over the quantity and quality of work performed, ensuring the personal safety of PD subjects and ensuring safety of property;

5.2.3 Completion and submission of required reporting forms to executive authorities and other authorized organizations;

5.2.4 formalization of civil-law relations;

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5.2.5 implementation of access control.

5.3 Any personal information such as criminal record, health status, family composition, presence of minor children and dependents and other information is processed by the Company only for the purpose of labor relations and provision of guarantees and compensations provided by the labor law and the Company IRD.

6. Legal Basis for Processing Personal Data

6.1 The Company processes the PD of PD subjects in accordance with:

6.1.1 Labor Code of the Russian Federation, other federal laws and RLD containing labor law standards, Civil Code of the Russian Federation, Tax Code of the Russian Federation, Federal Law No. 14-FZ dated 08.02.1998 'On Limited Liability Companies' and other legal documents regulating relations related to the Company activities;

6.1.2 The Charter of FENSMA LLC;

6.1.3 contracts concluded between the Company and PD subjects;

6.1.4 consent to the processing of personal data, consent of Users to the processing of personal data authorized for dissemination;

6.1.5 order on approval of the list of employees authorized to work with personal data.

7. Scope and Categories of Processed Personal Data, Categories of Personal Data Subjects

7.1 The Company processes PD of the following PD subjects:

7.1.1 employees, former employees, candidates for vacant positions, and relatives of employees;

7.1.2 users of the website;

7.1.3 clients and counterparties - individuals;

7.1.4 representatives or employees, customers and counterparties - legal entities.

7.2 The Company processes any PD of employees, former employees, candidates for vacant positions, and relatives of employees for employment purposes. The Company processes any PD of clients and counterparties - individuals, as well as representatives or employees of clients and counterparties - legal entities for the purposes of civil legal relations.

7.3 Exception: PD of special categories:

7.3.1 about a medical condition when it is not job-related;

7.3.2 about race and nationality;

7.3.3 about political views;

7.3.4 about religious or philosophical beliefs;

7.3.5 about intimacy and privacy;

7.3.6 about a criminal record.

7.4 PD of employees, former employees, candidates for vacant positions:

7.4.1 last name, first name, patronymic, age, sex, date and place of birth;

7.4.2 passport information, citizenship;

7.4.3 education, specialty, qualification, length of service, work experience;

7.4.4 qualification upgrading, professional retraining, independent qualification assessment, attestation;

7.4.5 position held or work performed;

7.4.6 information on military registration;

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- 7.4.7 social guarantees, benefits, and the grounds for them;
- 7.4.8 state of health, results of medical examination, psychiatric examination;
- 7.4.9 photo;
- 7.4.10 residence address, telephone number, personal e-mail address;
- 7.4.11 INN
- 7.4.12 marriage registration data;
- 7.4.13 disability information;
- 7.4.14 alimony deduction information;

7.4.15 a document confirming registration in the individual (personified) accounting system, including in the form of an electronic document;

7.4.16 other PD communicated by candidates in resumes and cover letters and by employees in accordance with the labor laws of the Russian Federation.

7.5 PD on the marital status of employees and their family members:

- 7.5.1 marital status, kinship;
- 7.5.2 the presence of dependent children;
- 7.5.3 last name, first name, patronymic of relatives, year of birth;
- 7.5.4 the health status of family members;
- 7.5.5 the need to care for a sick family member;
- 7.5.6 of adoption;

7.5.7 other facts on the basis of which employees shall be provided with guarantees and compensations under the law and the Company IRD.

7.6 PD of clients and counterparties - individuals, representatives or employees of clients and counterparties - legal entities:

- 7.6.1 last name, first name, patronymic, age, date and place of birth;
- 7.6.2 passport information;

7.6.3 residence addresses of customers and counterparties - individuals, representatives or employees of customers and counterparties - legal entities;

- 7.6.4 position, INN, settlement account number;
- 7.6.5 phone number, personal e-mail address;

7.6.6 other PD submitted by clients and counterparties (individuals, necessary for conclusion and execution of contracts).

7.7 Personal data processing authorized for dissemination from among the special categories of personal data specified in the Federal Law dated 27.07.2006 No. 152-FZ 'On Personal Data' is allowed if the prohibitions and conditions stipulated by the laws of the Russian Federation are observed.

7.8 On the website, the Operator collects and processes anonymized data about visitors (including cookies) using Internet statistics services (Yandex Metrika, Google Analytics and others). The anonymized data of Users collected through Internet statistics services are used to collect information about Users' actions on the website, to improve the quality of the website and its content.

7.9 Operator processes User PD only if they are filled in and/or sent by the User independently through special forms located on the site <https://fensma.ru>, <https://fensma.com> or sent to the Operator via e-mail. By filling in the relevant forms and / or sending their personal data to the Operator, the User confirms their familiarization with this Policy and expresses their consent to this Policy.

7.10 The Operator processes anonymized data about the User if it is allowed in the User's browser settings (cookies and JavaScript technology enabled).

7.11 Operator does not process biometric data (information characterizing physiological and biological features of a person on the basis of which his/her identity can be established).

8. Procedure and Conditions of Personal Data Processing

8.1 The Company ensures creation, movement and storage of personnel records and other documents containing PD in such a way as to prevent unauthorized use of this information, including:

8.1.1 identifies threats to the security of PD during its processing;

8.1.2 adopts IRD and other documents regulating relations in the field of processing and protection of personal data;

8.1.3 creates the necessary conditions for working with PD, organizes accounting of documents containing PD, organizes work with information systems in which PD is processed.

8.2 PD processing is accomplished by:

8.2.1 obtaining PD orally and in writing directly from PD subjects;

8.2.2 obtaining PD from publicly available sources;

8.2.3 entering PD into the Company logs, registers and information systems;

8.2.4 using other methods of PD processing.

8.3 Only those employees in the Company who need it to fulfill their job duties have access to PD. The list of employees allowed to work with PD is approved by the order of the Head of the Company or authorized representative. Employees are trained in the methods and techniques of secure PD processing before being granted access to PD.

8.4 For violation of the rules of processing and storage of personal data, employees processing personal data are subject to disciplinary liability in the form of a remark, reprimand, or dismissal.

8.5 The Company performs both automated and non-automated PD processing.

8.6 The Company obtains all PD only from the PD subject. In cases where PD can only be obtained from third parties, this is done with the written consent of the PD subject.

8.7 In cases stipulated by the laws, the Company processes PD without special consent of the PD subject. In other cases, the Company offers the PD subject to execute a personalized and specific written consent to PD processing.

8.8 The PD subject may revoke his/her consent to PD processing at any time.

8.9 The website user may withdraw his/her consent to the personal data processing at any time by sending a notice to the Operator by e-mail to the e-mail address feedback@fensma.ru, marked 'Withdrawal of consent to personal data processing'.

8.10 The Company stores Personal Data in a manner that prevents its loss or misuse. Upon achievement of the processing objectives, the Company destroys the PD.

8.11 Exceptions:

8.11.1 PD shall be kept for a long period of time due to the requirements of RLD;

8.11.2 the job candidate wishes to remain in the talent pool.

8.12 Personal data recorded on hard copies is stored in locked cabinets or in locked rooms with limited access rights. PD of the subjects processed using automation tools for different purposes are stored in closed folders of file exchangers with restricted access rights.

8.13 The Company and other persons who have access to PD shall not disclose to third parties or disseminate PD without consent of the PD subject, unless otherwise provided for by the laws of the Russian Federation.

8.14 The Company transfers PD in accordance with the procedure established by the laws of the Russian Federation. Personal Data is transferred only with the written consent of PD subject, except for cases provided for by the laws of the Russian Federation.

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8.15 Data is transferred to inquiry and investigative bodies, the Federal Tax Service, the Pension Fund of the Russian Federation, the Social Insurance Fund and other authorized executive authorities and organizations in accordance with the requirements of the laws of the Russian Federation.

8.16 All information that is collected by third-party services, including payment systems, communications and other service providers, is stored and processed by these operators in accordance with their user agreement and privacy policy. The PD Subject and/or the Website User is obliged to familiarize himself/herself with these documents in a timely manner. The Operator is not liable for the actions of third parties, including the service providers mentioned in this clause.

8.17 The Company may perform cross-border transfer of personal data to the territories of foreign states that are parties to the Council of Europe Convention for protection of Individuals with regard to automatic PD processing, which provide adequate protection of the rights of PD subjects, as well as to the territories of foreign states that do not provide adequate protection of the rights of personal data subjects, namely they are not party to the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data, and are not specified in the Order of the Federal Service for Supervision in the Sphere of Communications, Information Technology and Mass Media dated 15.03.2013 No. 274 'On Approval of the List of Foreign States That Are Not Parties to the Convention of the Council Of Europe on Protection of Individuals with Regard to Automatic Processing of Personal Data and Ensure Adequate Protection of the Rights of Personal Data Subjects' and ensure adequate protection of the rights of personal data subjects and are not equal to such countries that ensure adequate protection of the rights of personal data subjects.

8.18 In case of transfer of personal data in the territory of foreign countries specified in clause 8.13 of this Policy, the purpose of trans-border transfer of personal data is to organize business trips and workflow.

8.19 The list of actions related to processing of personal data during cross-border transfer: recording, systematization, storage, clarification, transfer, depersonalization, blocking, deletion, destruction.

8.20 Methods of personal data processing in case of cross-border transfer: automated processing with transfer via the information and the 'Internet' telecommunication network, with the adoption of the necessary legal, organizational and technical measures.

8.21 The Company undertakes to carry out cross-border transfer of PD only if the following is observed:

8.21.1 if the PD subject consents in writing to the cross-border transfer of data to the territory of foreign countries specified in clause 8.13 of this Policy;

8.21.2 the purpose of transferring personal data to foreign countries is not excessive and corresponds to the conditions determined in accordance with the provisions of the current laws of the Russian Federation, as well as the existing and concluded international agreements of the Russian Federation;


8.21.3 there are contractual relations with official representatives of foreign states and/or commercial companies to whom the transfer of personal data is carried out, which establish technical and organizational measures for such transfer, as well as the legal basis and purposes of PD processing;

8.21.4 execution of a contract to which the PD subject is a party;

8.21.5 protection of life, health, other vital interests of the PD subject or other persons if it is impossible to obtain the PD subject written consent.

8.22 As a result of cross-border data transfer, the laws of the state to which such information was transferred apply to PD processing.

8.23 When collecting personal data, including via the 'Internet' information and telecommunications network, the Company ensures recording, systematization, accumulation, storage, clarification (update, change), retrieval of employees' personal data using databases located in the territory of the Russian Federation, except for cases stipulated by the laws of the Russian Federation.

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9. Updating, Correcting, Deleting and Destroying Personal Data. Responses to Requests of Personal Data Subjects for Access to Personal Data

9.1 Upon application or at the request of a PD subject or his/her representative, as well as at the request of Roskomnadzor, the Company blocks the unlawfully processed PD of this PD subject from the moment of application or receipt of a request for the period of verification.

9.2 If the fact of inaccuracy of the Personal Data is confirmed, the Company shall, based on the information provided by the PD subject or his/her representative or Roskomnadzor, or other necessary documents, clarify the Personal Data within 7 (seven) business days from the date of provision of such information.

9.3 In case of identifying inaccuracies in PD, the Website User may update it independently by sending a notice to the Operator to the Operator's e-mail address feedback@fensma.ru with the note 'Personal Data Update'.

9.4 In case of detection of unlawful PD processing, the Company stops unlawful PD processing on the day of detection of unlawful processing.

9.5 In the event that the purpose of PD processing has been achieved, the Company stops PD processing and destroy PD within a period not exceeding 30 (thirty) days from the moment the purpose of PD processing has been achieved, unless otherwise provided for in the contract to which the PD subject is a party, beneficiary or guarantor, or the Operator may not process PD without the consent of the PD subject on the grounds provided for by the laws of the Russian Federation, or unless otherwise provided for in other agreements between the Company and the PD subject.

9.6 In case a PD subject revokes his/her consent to processing of his/her data, the Company stops processing it on the day of receipt of the revocation.

9.7 The Company informs the PD subject or his/her representative about the availability of PD related to the PD subject. At the request of the PD subject or his/her representative, the Company familiarizes him/her with this PD within 5 (five) working days from the moment of receipt of the request. The data provided are not include Personal Data related to other PD subjects, unless there are legitimate grounds for disclosure of such Personal Data. The request shall contain:

9.7.1 number of the main identity document of the PD subject or his/her representative, information on the date of issue of the said document and the issuing authority;

9.7.2 information confirming the PD subject's participation in relations with the Company (contract number, date of contract conclusion, conventional verbal designation and (or) other information), or information otherwise confirming the fact of PD processing by the Company;

9.7.3 signature of the PD subject or his/her representative. The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with the laws of the Russian Federation. If a data subject's application (request) does not contain all the necessary information in accordance with the requirements of the laws of the Russian Federation, or if the personal data subject does not have access rights to the requested information, a reasoned refusal is sent to the data subject. The right of a data subject to access his/her personal data may be restricted in accordance with Article 14.8 of Federal Law No. 152-FZ dated 27.07.2006 'On Personal Data', including where the PD subject's access to his/her personal data violates the rights and legitimate interests of third parties.

9.8 A website user may obtain any clarifications on any questions of interest regarding processing of his/her personal data by contacting the Operator via e-mail at feedback@fensma.ru.

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10. Responsibility

10.1 Subjects who have provided the Operator with unreliable data about themselves or information about another PD Subject without the latter's consent are liable in accordance with the laws of the Russian Federation.

10.2 The Company employees who violate the requirements of the laws of the Russian Federation and the Company IRD regarding the processing and protection of Personal Data are held liable in accordance with the laws of the Russian Federation.

10.3 Responsibility for the development, updating of P-PDPP3-2.4.1-2022 is borne by the Head of HR Administration Department.

10.4 Responsibility for issuance, enactment, withdrawal and cancellation of P-PDPP3-2.4.1-2022 is borne by the head of Head of Management Documentation Support, Certification and Licensing Department.

10.5 This Policy is effective from the date of signing the Order on its approval.

