

Policy

regarding the processing of personal data in the
Gotek Group of companies

1. General information:

This Policy regulates legal relations arising in the process of processing personal data, both of employees of the Gotek Group of companies and other subjects of personal data.

The purpose of this Policy is to protect the personal data of employees of the enterprise and other subjects of personal data from unauthorized access and disclosure. Personal data (hereinafter referred to as PD) is always confidential, strictly protected information.

- 1.1. Regulatory legislative documents in accordance with which this Policy has been developed:
 - Constitution of the Russian Federation;
 - Labor Code of the Russian Federation;
 - Federal Law No. 152-FZ "On Personal Data" and other applicable regulatory legal acts of the Russian Federation.
- 1.2. This Policy is published on the website of the Gotek Group of companies from the moment of approval and entry into force.
- 1.3. The Gotek Group of companies has the right to amend this Policy unilaterally and at any time.
- 1.4. This Policy is approved by the Gotek Group of companies and is subject to mandatory application.

2. Notions and terms:

- 2.1. **Personal data** - any information relating directly or indirectly to a specific or identifiable individual (subject of personal data);
- 2.2. **Operator** - a state body, municipal body, legal or natural person, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.
- 2.3. **Personal data subject** is an individual who is directly or indirectly defined or determined using personal data.
- 2.4. **Processing of personal data** - any action (operation) or a set of actions (operations) performed using automation tools or without using such 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;
- 2.5. **Dissemination of personal data** - actions aimed at disclosing personal data to an indefinite circle of persons;

- 2.6. **Provision of personal data** - actions aimed at disclosing personal data to a certain person or a certain circle of persons;
- 2.7. **Personal data information system** - a set of personal data contained in databases and information technologies and technical means providing their processing;
- 2.8. **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;
- 2.9. **Automated processing of personal data** - processing of personal data using computer technology;
- 2.10. **Cross-border transfer of personal data** - the transfer of personal data to the territory of a foreign state to a foreign state authority, a foreign individual or a foreign legal entity.
- 2.11. **The "Gotek" Group of companies should be understood as:**
- JSC Management company of "Gotek" Group of companies, TIN 4633009632, address: 121552 Moscow, Yartsevskaya street 19, floor 5, room CXVI, room 20.
 - JSC "Gotek", TIN 4633000037, address: 307170, Kursk region, Zheleznogorsk, Promzona territory, Liter B1.
 - JSC «Gotek – Center», TIN 7116146114, address: 301661Tula region, Novomoskovsk district, Novomoskovsk, Komsomolskoe highway, 64A.
 - JSC «Gotek North – West», TIN 4703099079, address: 188682, Leningrad region, Vsevolozhsky district, Novosaratovka village, house 6, Liter A, office 1.
 - JSC «Gotek – Print», TIN 4633010405, address: 307170, Kursk region, Zheleznogorsk, Promzona territory, Liter B1.
 - JSC «Gotek – Polipak», TIN 4633000171, address: 307170, Kursk region, Zheleznogorsk, Promzona territory, Liter B2.
 - JSC «Gotek – Litar», TIN 4633010853, address: 307170, Kursk region, Zheleznogorsk, Promzona territory, Liter B2.
 - JSC «Universal leasing», TIN 5032050910, address: 307170 Kursk region, Zheleznogorsk, Promzona territory, Liter B1.
 - LLC «Gotek – CPU», TIN 4633016372, address: 307170, Kursk region, Zheleznogorsk, Promzona territory, Liter B1.
- 2.12. **Site administration** - authorized employees to manage the site, acting on its behalf, who organize and (or) process personal data, and also determine the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.
- 2.13. **Site user (hereinafter referred to as the User)** is a person who has access to the site via the Internet and uses this site for his own purposes.
- 2.14. **Cookies** - small piece of data sent by a web server and stored on the user's computer, which the web client or web browser sends to the web server each time in an HTTP request when trying to open the page of the corresponding site.

2.15. **IP-address** - unique network address of a node in a computer network built using the IP protocol.

2.16. **Confidentiality of personal data**

Information about personal data is classified as confidential (constituting a secret of the Company protected by law). The confidentiality regime with respect to personal data is removed:

- in case of their depersonalization;
- after 50 years of their storage period;
- in other cases, stipulated by federal laws.

3. **Principles and purposes of personal data processing**

3.1. The Gotek Group of companies, being the operator of personal data, processes personal data of employees and other entities that are not in labor relations with the Group of companies.

3.2. The processing of personal data in the Gotek Group of companies is carried out taking into account the need to ensure the protection of the rights and freedoms of employees and other subjects of personal data, including the protection of the right to privacy, personal and family secrets, based on the following principles:

the processing of personal data is carried out in the Gotek Group of companies on a legal and fair basis;

- the processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes;
- processing of personal data that is incompatible with the purposes of collecting personal data is not allowed;
- it is not allowed to combine databases containing personal data, the processing of which is carried out for purposes incompatible with each other;
- only personal data that meet the purposes of their processing are subject to processing;
- the content and volume of processed personal data corresponds to the stated processing objectives. The redundancy of the processed personal data in relation to the stated purposes of their processing is not allowed;
- when processing personal data, the accuracy of personal data, their sufficiency, and, if necessary, relevance in relation to the purposes of processing personal data are ensured. The Gotek Group of companies takes all necessary measures or ensures that they are taken to remove or clarify incomplete or inaccurate personal data;
- storage of personal data is carried out in a form that makes it possible to determine the subject of personal data, no longer than the purpose of processing personal data requires, unless the storage period for personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor;
- the processed personal data is destroyed or depersonalized upon achievement of the processing goals or in case of loss of the need to achieve these goals, unless otherwise provided by federal law.

- 3.3. Personal data is processed by the Gotek Group of companies in order to:
- ensure compliance with the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation, local regulatory acts of the enterprise;
 - perform the functions, powers and duties assigned by the legislation of the Russian Federation to the enterprise, including the provision of personal data to state authorities, 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;
 - regulation of labor relations with employees of the enterprise (assistance in employment, training and promotion, ensuring personal safety, monitoring the quantity and quality of work performed, ensuring the safety of property);
 - provide employees of the enterprise and members of their families with additional guarantees and compensations, including non-state pension provision, voluntary medical insurance, medical care and other types of social security;
 - protection of life, health or other vital interests of subjects of personal data;
 - conclusion of any agreements with the Subject of personal data and their further execution;
 - providing the Subject of personal data with information about manufactured and sold products, services provided, about the development of new goods and services;
 - informing the Counterparties about offers for products and services of the Gotek Group of companies;
 - preparation, conclusion, execution and termination of contracts with counterparties;
 - provision of access and intra-facility regimes at the facilities of the enterprise;
 - formation of reference materials for internal information support of the activities of the enterprises of the Gotek Group of companies;
 - 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;
 - exercising the rights and legitimate interests of the enterprises of the Gotek Group of companies in the framework of the activities provided for by the Charter and other local regulations, or achieving socially significant goals;
 - other legal purposes.

4. **List of personal data processed by "Gotek" Group of companies**

4.1.

The list of personal data processed in the Gotek Group of companies is determined in accordance with the legislation of the Russian Federation and local regulations of the enterprise, taking into account the purposes of processing personal data specified in section 4 of this Policy.

- 4.2. The processing of special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, intimate life is not carried out in the Gotek Group of companies.
- 4.3. The list of personal data permitted for processing within the framework of using the site (site page) is provided by the User by filling out special forms on the Site and usually includes the following information:
 - last name, first name, patronymic of the User;
 - contact phone number of the User;
 - e-mail address;
 - data about the employer and the title of the User and other data.
- 4.4. The site administration also takes efforts to protect Personal data, which are automatically transmitted during the visit to the site pages:
 - IP-address;
 - information from cookies;
 - information about the browser (or other program that accesses the site);
 - access time;
 - visited page addresses;
 - referrer (address of the previous page), etc.
- 4.5. Disabling cookies may result in the inability to access the site.
- 4.6. The site collects statistics about the IP addresses of its visitors. This information is used to identify and solve technical problems, to control the correctness of operations.

5. **Functions of "Gotek" Group of companies when processing personal data**

5.1. **Measures to ensure the security of personal data during their processing.**

When processing PD, the enterprise applies the necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution of PD, as well as from other illegal actions in relation to personal data.

Ensuring the security of personal data is achieved by the following measures:

- identification of threats to the security of personal data during their processing in personal data information systems (hereinafter - PDIS);
- application of organizational and technical measures to ensure the security of personal data during their processing in PDIS, necessary to meet the requirements for the protection of PD, the implementation of which is ensured by the levels of protection of personal data established by the Government of the Russian Federation;
- evaluation of the effectiveness of measures taken to ensure the security of personal data prior to the commissioning of the PDIS;
- accounting of computer systems of personal data;

- detection of facts of unauthorized access to personal data and taking measures;
- recovery of personal data modified or destroyed due to unauthorized access to them;
- establishment of rules for access to personal data processed in the PDIS, as well as ensuring registration and accounting of all actions performed with personal data in the PDIS;
- control over the measures taken to ensure the security of personal data and the level of protection of the PDIS.

5.2. **Conditions and methods of processing personal data.**

PD processing at the enterprise is carried out in compliance with the principles and rules established by the federal law "On Personal Data" and is allowed in the following cases:

- processing of personal data is carried out with the consent of the subject of personal data to the processing of his personal data;
- processing of personal data is necessary to achieve the goals stipulated by the legislation of the Russian Federation, for the implementation and fulfillment of the functions, powers and duties imposed by the legislation of the Russian Federation on the operator;
- processing of personal data is necessary for the performance of an agreement to which the subject of personal data is a party or beneficiary or guarantor, as well as for concluding an agreement on the initiative of the subject of personal data or an agreement according to which the subject of personal data will be the beneficiary or guarantor;
- processing of personal data is necessary to protect the life, health or other vital interests of the subject of personal data, if it is impossible to obtain the consent of the subject of personal data;
- 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 this does not violate the rights and freedoms of the subject of personal data;
- processing of personal data is carried out for statistical or other research purposes, subject to the mandatory depersonalization of personal data. An exception is the processing of personal data in order to promote goods, works, services on the market by making direct contacts with a potential consumer using communication means;
- processing of personal data is carried out, access of an unlimited number of persons to which is provided by the subject of personal data or at his request (hereinafter - personal data made publicly available by the subject of personal data).

The company can include personal data of employees in publicly available sources of personal data, while the company takes the employee's written consent to the processing of his personal data.

Biometric personal data (information that characterizes the physiological and biological characteristics of a person, on the basis of which it is possible to establish his identity and which is used by the operator to establish the identity of the subject of personal data) are not processed at the enterprise.

The processing of personal data at the enterprises of the Gotek Group of companies is carried out in the following ways:

- non-automated processing of personal data,
- automated processing of personal data with or without transmission of the information received via information and telecommunication networks,
- mixed processing of personal data.

The company carries out cross-border transfer of personal data, only with the written consent of the subject of personal data. The company has the right to entrust the processing of personal data to another person with the consent of the subject of personal data, on the basis of an agreement concluded with this person.

The company and other persons who have gained access to personal data are obliged not to disclose to third parties and not to distribute personal data without the consent of the subject of personal data, unless otherwise provided by Federal Law.

The user of the site accepts the terms of this Policy in full and gives his consent to the processing of personal data of the GOTEK Group of companies, as well as to persons providing technical support for the site.

6. Rights of subjects of personal data

6.1. Personal data subjects have the right to get:

- complete information about their personal data processed in the Group of enterprises;
- access to their personal data, including the right to receive a copy of any record containing their personal data, except as provided for by federal law, as well as to access medical data related to them with the help of a medical specialist of their choice;
- clarification of their personal data, their blocking or destruction in the event that personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing;
- withdrawal of consent to the processing of personal data;
- taking measures provided by law to protect their rights;
- appeal against an action or inaction of an enterprise, carried out in violation of the requirements of the legislation of the Russian Federation in the field of personal data, to an authorized body for the protection of the rights of subjects of personal data or to a court;

- exercise of other rights stipulated by the legislation of the Russian Federation.

7. Measures taken by "Gotek" Group of companies to ensure the fulfillment of the operator's obligations when processing personal data

7.1. The measures necessary and sufficient to ensure that Gotek enterprises fulfill the operator's obligations stipulated by the legislation of the Russian Federation in the field of personal data include:

- appointment of a person responsible for organizing the processing of personal data at the enterprise;
- adoption of local regulations and other documents in the field of processing and protection of personal data;
- organizing training and conducting methodological work with employees of structural divisions, branches and all enterprises of the Group;
- obtaining the consent of the subjects of personal data to the processing of their personal data, with the exception of cases provided for by the legislation of the Russian Federation;
- separation of personal data processed without the use of automation tools from other information, in particular by recording them on separate material carriers of personal data, in special sections;
- ensuring the separate storage of personal data and their material carriers, the processing of which is carried out for different purposes and which contain different categories of personal data;
- imposing a ban on the transfer of personal data through open communication channels, computer networks outside the controlled area and the Internet without applying established measures to ensure the security of personal data (with the exception of publicly available and (or) anonymized personal data);
- storage of tangible carriers of personal data in compliance with conditions ensuring the safety of personal data and excluding unauthorized access to them;
- implementation of internal control over the compliance of the processing of personal data with the Federal Law "On Personal Data" and the regulatory legal acts adopted in accordance with it, the requirements for the protection of personal data, this Policy, internal regulatory documents (regulations, provisions, methods, etc.) governing the process processing of personal data in the Gotek Group of companies;
- other measures provided for by the legislation of the Russian Federation.

Measures to ensure the security of personal data during their processing in personal data information systems are established in accordance with the local regulations of the enterprise, regulating the issues of ensuring the security of personal data when processing them in information systems.

8. Responsibility for disclosure of information related to personal data

- 8.1. Persons guilty of violating the rules governing the receipt, processing and protection of personal data are subject to disciplinary, administrative, civil or criminal liability in accordance with federal laws.