

Addendum №8
to order № _____ dated _____

APPROVE
General Director
“Syktyvkar Plywood Mill” Ltd.

_____ Vyrilan I.A.

_____ 2019

Personal data processing policy of Syktyvkar Plywood Mill Ltd.

This Policy for the processing of personal data at Syktyvkar Plywood Mill Ltd. (hereinafter referred to as the Policy) defines the general provisions implemented in the processing of personal data at Syktyvkar Plywood Mill Ltd. (hereinafter referred to as the Company).

The purpose of the Policy adoption is to comply with the requirements of legislation¹ in the field of personal data protection, based on the Constitution of the Russian Federation and international treaties of the Russian Federation and consisting of Federal Law N 152-ФЗ "On Personal Data", dated July 27, 2006 and other federal laws and by-laws determining cases and personal data processing features².

1. BASIC TERMS AND DEFINITIONS³:

- 1.1. **Personal data** - any information related to a directly or indirectly specified natural person (personal data owner);
- 1.2. **Personal data owner** - an individual who is directly or indirectly determined or could be determined by personal data;
- 1.3. **Operator** - a state body, municipal body, legal or natural person who independently or jointly with other persons, arranges and (or) performs processing of personal data, as well as defines the aims of personal data processing, the scope of personal data subjected to processing and personal data handling;
- 1.4. **Personal data processing** - any action or a series of actions performed towards personal data with or without the software, including the personal data acquisition, recording, systematization, accumulation, storage, update and alteration, extraction, use, transfer (distribution, presentation, providing access), depersonalization, blocking, deleting and erasure;
- 1.5. **Automated processing of personal data** - processing of personal data using PC software;
- 1.6. **Distribution of personal data** - actions aimed at disclosing personal data to an indefinite number of persons;
- 1.7. **Provision of personal data** - personal data disclosure to particular person or certain group of persons;
- 1.8. **Blocking of personal data** - temporary interruption of personal data processing (except where processing is required for personal data update or alteration);

¹ p.2 p. 1 art. 18.1 of Federal Law N 152-ФЗ "On personal data" dated July 27.2006

² art. 4. of Federal Law N 152-ФЗ "On personal data" dated July 27.2006

³ art. 3. of Federal Law N 152-ФЗ «On personal data» dated July 27.2006

1.9. **Erasure of personal data** - actions making it impossible to restore personal data volume in the personal data information system and/or resulting in the elimination of tangible personal data carriers;

1.10. **Depersonalization of personal data** - actions making it impossible to identify personal data as related to a certain data subject without involving an additional information;

1.11. **Personal data information system** - a set of personal data included into personal data databases, as well as the software and tools used for their processing;

1.12. **Trans-border transfer of personal data** - personal data transfer to a foreign country, foreign government body and foreign natural or legal person.

2. PRINCIPLES OF PROCESSING PERSONAL DATA⁴

2.1. The processing of personal data should be performed on a legitimate equitable basis.

2.2. The processing of personal data should be limited to reaching specific predetermined legitimate aims. Processing of personal data incompatible with the purposes of personal data acquisition is not allowed.

2.3. Combining databases that contain personal data processed for the purposes incompatible with each other is not allowed.

2.4. Personal data meeting the purposes of their processing may only be processed.

2.5. The content and volume of personal data should comply with the stated processing goals. The personal data should not be redundant in relation to the stated purposes of processing.

2.6. The processing of personal data must be accurate, sufficient, as well as updated if necessary in relation to the purposes of personal data processing. The operator should take the necessary measures to delete or adjust incomplete or inaccurate personal data.

2.7. Storage of personal data should be carried out in a form that enables to determine the personal data owner, no longer than what is required by the purpose of personal data processing, in case the personal data storage period is not set by a federal law or an agreement under which the beneficiary or guarantor is the subject of the personal data. The processed personal data is deleted or depersonalized once the purposes of processing are achieved or in case achieving these purposes is not required anymore, unless otherwise provided by a federal law.

3. TERMS OF PERSONAL DATA PROCESSING⁵

3.1. The processing of personal data must be carried out in compliance with the principles and rules provided by federal laws.

3.2. The processing of personal data is allowed in the following cases:

3.2.1. processing of personal data is carried out with the consent of the personal data owner for processing, including the transfer of one's personal data;

3.2.2. The processing of personal data is necessary to achieve the goals stipulated by the international treaty of the Russian Federation or the law to carry out and fulfill the functions, powers and obligations assigned to the operator by the legislation of the Russian Federation;

3.2.3. The processing of personal data is necessary for implementation of justice, execution of a judicial act, an act of another body or official to be executed in accordance with the legislation of the Russian Federation on enforcement proceedings;

3.2.4. Processing of personal data is necessary to fulfill the powers of federal executive bodies, State non-budgetary funds, executive State government bodies of the constituent entities of the Russian Federation, local authorities and the functions of organizations involved in the

⁴ art. 5. of Federal Law N 152-ФЗ "On personal data" dated July 27.2006

⁵ art. 6. of Federal Law N 152-ФЗ "On personal data" dated July 27.2006

3.2.5. provision of state and municipal services, respectively, set by the Federal Law № 210-ФЗ "On organization of state and municipal services provision", including registration of the personal data owner on a Public Services Portal of the Russian Federation and (or) regional portals of state and municipal services;

3.2.5. the processing of personal data is necessary for execution of a contract under which the owner of personal data is either the beneficiary or guarantor, as well as for making a contract by the initiative of the personal data owner or a contract under which the personal data owner will be the beneficiary or guarantor;

3.2.6. The processing of personal data is necessary to protect the life, health or other vital interests of the personal data owner, in case it is impossible to get the consent of the personal data owner;

3.2.7. 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 it does not violate the rights and freedoms of the personal data owner;

3.2.8. The processing of personal data is necessary for the professional activities of a journalist and (or) the legitimate activities of the media or scientific, literary or other creative activities, provided that it does not violate the rights and legitimate interests of the personal data owner;

3.2.9. Personal data processing is carried out for statistical or other research purposes, except the purposes specified in Article 15 of this Federal Law, subject to the mandatory depersonalization of the personal data;

3.2.10. Processing of personal data is carried out, when access to it is provided by the personal data owner or at his request to an unlimited number of persons (hereinafter - personal data made publicly available by the personal data owner);

3.2.11. Processing of personal data is carried out if it's subject to publication or mandatory disclosure in accordance with federal law.

3.3. The operator has the right to entrust the processing of personal data to another person with the consent of the personal data owner, unless otherwise provided by a federal law, on the basis of an agreement made with that person, including a state or municipal contract, or by adoption of the relevant act (hereinafter - the order operator) by a state or municipal body. A person who processes personal data on behalf of the operator is required to comply with the principles and rules for the processing of personal data provided for by this Federal Law.

4. SCOPE AND CATEGORIES OF THE PROCESSED PERSONAL DATA, CATEGORIES OF PERSONAL DATA SUBJECTS

4.1. The Company carries out the processing of personal data on a legitimate equitable basis of the following personal data owners:

4.1.1. Company employees;

4.1.2. Personal data of citizens.

5. PROCEDURE AND TERMS OF PERSONAL DATA PROCESSING

5.1. The list of actions carried out by the Company with personal data: acquisition, record, systematization, accumulation, storage; clarification (update, change); extraction; using; transmission (distribution, provision, access); depersonalization; blocking; removal; erasure.

5.2. The Company has the following methods for personal data processing:

5.2.1. Automated personal data processing;

5.2.2. Non-automated personal data processing.

6. TIME LIMITS OF PROCESSING PERSONAL DATA

6.1. In case of achieving the goals of personal data processing or losing the need to achieve these goals personal data of entities processed by the Company is subject to erasure or depersonalization if:

6.1.1. Otherwise is not provided by the contract under which the personal data owner is the beneficiary or guarantor;

6.1.2. Company is not entitled to process without the consent of the personal data owner in accordance with the Federal Law "On Personal Data" or other federal laws;

6.1.3. Otherwise is not provided by another agreement between the Company and the personal data owner.

7. MEASURES USED TO PROTECT PERSONAL DATA⁶

7.1. Company takes the necessary and sufficient organizational and technical measures stipulated by the legislation in the field of personal data protection to protect personal data requiring confidentiality from unlawful or accidental access, erasure, amendment, blocking, copying, distribution, as well as from other illegal actions by third parties.

7.2. When instructing the processing of personal data to third parties, the instruction shall indicate the requirements for the protection of processed personal data⁷ in accordance with the requirements of the legislation in the field of personal data⁸.

7.3. Internal control over the compliance of the personal data processing with the legislation and the regulatory legal acts adopted in accordance with it, is carried out in the way established by the Government of the Russian Federation⁹.

7.4. The databases of the Company are located exclusively on the territory of the Russian Federation.

8. RESTRICTIONS ON THIS POLICY

The policy does not apply to relations arising from¹⁰:

8.1. Processing of personal data by individuals solely for personal and family needs, if this does not violate the rights of a personal data owner;

⁶ p. 1 art. 18.1 of Federal Law N 152-ФЗ "On personal data" dated July 27.2006

⁷ p. 3 art. 6 of Federal Law N 152-ФЗ "On personal data" dated July 27.2006

⁸ p. 3 art. 6 of Federal Law N 152-ФЗ "On personal data" dated July 27.2006

⁹ p. 17 of the Decree of the Russian Government № 1119 "On confirmation of requirement for personal data protection while processing in IT systems" dated November 01, 2012.

¹⁰ p. 2 art. 1 of Federal Law N 152-ФЗ "On personal data" dated July 27.2006

8.2. Management of storage, acquisition, accounting and use of documents, containing personal data, from the Archival Fund of the Russian Federation and other archival documents in accordance with the legislation on archival affairs in the Russian Federation;

8.3. Processing of personal data referred in the established order to information constituting a state secret;

8.4. Provision of information by authorized bodies on the activities of courts in the Russian Federation in accordance with Federal Law N 262-ФЗ "On providing access to information on the activities of courts in the Russian Federation" dated December 22, 2008.

9. REGULATIONS OF RESPONSE TO REQUESTS AND APPEALS OF PERSONAL DATA OWNERS AND THEIR REPRESENTATIVES

9.1. The personal data owner has the right to receive information about the processing of his personal data in the Company.

9.2. The personal data owner has the right to ask the Company to clarify his personal data, block it or erase it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as take measures prescribed by law to protect their rights.

9.3. Reception of appeal (request) takes place in the following forms:

9.3.1. Reception of direct appeal of the personal data owner (his representative);

9.3.2. Receiving a mail request from the personal data owner (his representative).

9.4. In the case of an appeal by a representative of a personal data owner, Operator is obliged to request authority of the personal data owner and attach it to the request.

9.5. Information on the personal data availability is provided to the subject when responding to the request within thirty days from the date of receipt request of the personal data owner or his legal representative.

9.6. The personal data owner has the right to withdraw his consent to the processing of the personal data any time by contacting the Company.

10. REGULATIONS FOR RESPONSE TO REQUESTS AND APPEALS OF AUTHORIZED AUTHORITIES

10.1. The company shall provide information to the authorized body for the protection of the rights of the personal data subjects at its request, necessary for the activities of the said body within thirty days from the receipt of the request.

11. CONTACT INFORMATION

“Syktyvkar Plywood Mill” Ltd., address: 66 Ukhtinskoe ave., Syktyvkar, Komi Republic, Russia, TRN 1121009024, PSRN 1021101120380