

# **AURUS LLC**

## **PERSONAL DATA PROCESSING**

### **POLICY**

#### **1. General Provisions**

The AURUS LLC personal data processing policy is developed according to part 2 of art. 18.1 of Federal Law No. 152-FZ On Personal Data dated July 27, 2006 and is intended for provision of unlimited access to the information regarding personal data processing, as well as to the data on requirements for the personal data protection implemented in AURUS LLC.

Personal data belongs and is referred to the confidential information category and is protected from unauthorized access, including the accidental one.

#### **2. Basic Terms in the Field of Personal Data**

Personal data means any information referred to any natural person defined or being defined directly or indirectly, including the following:

- full name;
- date and place of birth;
- registration address, place of residence;
- marital, social, property status;
- education, profession, income, etc.

Also, in the Policy, the following terms are used:

The personal data operator is a legal entity organizing and performing personal data processing independently or together with third parties, as well as defining processing objectives, personal data composition and related activities;

The personal data subject is a natural person, whose personal data is being processed by the personal data operator.

Personal data processing is any activity or operation performed with personal data including collecting, recording, systematization, accumulation, storage, clarification (updating, change), extraction, use, delivery (distribution, provision, access), depersonalization, blocking, deletion, destruction.

Automated personal data processing is personal data processing by means of computer aids.

Personal data distribution means activities aimed at personal data disclosure to public at large or any number of unspecified persons.

Personal data provision means actions aimed at personal data disclosure to a certain person or to certain people.

Personal data destruction means actions, as a result of which it becomes impossible to restore the personal data content in the personal data information system or as a result of which personal data material or tangible media become destroyed.

Personal data depersonalization means actions, as a result of which it becomes impossible to define the particular personal data subject belonging or owning the personal data without additional information.

The personal data information system is a combination of personal data contained in databases and information technologies and hardware allowing data processing.

### **3. Personal Data Processing**

Personal data collection is performed directly from the personal data subject. If personal data provision is obligatory according to the laws, the personal data subject shall be provided with clarification on legal consequences of refusal to provide such data.

Obtaining personal data from a third party is possible only where legally permitted. When obtaining personal data from a third party, the subject shall be notified thereof.

Obtaining and processing any natural person's personal data on its political opinions, religious beliefs and private life are not allowed. In cases when such data processing is necessary in connection with performance of contractual obligations, the data can be obtained and processed only with the written consent of the natural person or its lawful or legal representative.

Personal data processing shall be performed in cases when the subject's consent for the processing of its personal data is obtained or in other cases provided for by the laws.

Personal data processing is performed only in order to comply with the laws and regulatory legal acts of the Russian Federation, to conclude contracts and perform contractual obligations.

Personal data processing is performed only by the operator's employees admitted by the management in accordance with the established procedure.

Personal data is processed both on tangible or material (paper) media and in electronic form (in personal data information systems, on machine-readable media).

Personal data shall be stored in the form allowing definition of the personal data subject and for no longer than required according to the personal data processing objectives if the personal data storage period is not provided for by the law or any contract, a party to which is the personal data subject.

Personal data storage is performed with due consideration of data confidentiality provision.

Personal data shall be destroyed or depersonalized after achievement of the processing objectives or in case of no further need for achievement of these objectives unless otherwise provided for by the law.

Personal data transfer or delivery to any third party is performed only with the personal data subject's consent or in cases directly provided for by the law.

Personal data disclosure to any third party without the corresponding subject's written consent is not allowed, except for the cases when it is necessary for protection of life, health or other vital interests of the personal data subject.

Personal data disclosure to any third party for commercial purposes without the corresponding subject's written consent is prohibited. Personal data processing for promotion of goods, works, services in the market, as well as for political agitation or campaigning shall be performed only with the subject's prior consent.

The right to access the personal data being processed in AURUS LLC shall be granted to the following persons:

- AURUS LLC Chief Executive Officer;
- other AURUS LLC employees having a need for personal data processing in connection with performance of their duties and functions. Admission of employees to personal data shall be provided by the management in accordance with the established procedure.

Any subject, whose personal data is being processed in AURUS LLC, has the right to access its personal data, including the following information:

- confirmation or certification of the fact of its personal data processing;
- legal grounds and objectives of its personal data processing;
- objectives and methods of personal data processing applied by the operator;
- operator's denomination and location, information on persons having access to personal data (except for the operator's employees) or to whom personal data can be disclosed based on a contract with the operator or based on the laws;
- list of processed personal data belonging or referred to the corresponding subject and the data source;
- personal data processing time and storage period;

- procedure for exercise of statutory rights by the subject;
- denomination of the entity performing personal data processing by the operator's order in case processing is commissioned to a third party.

#### **4. Personal Data Protection**

During personal data processing, necessary legal, organizational and technical measures are taken to protect personal data against illegal or accidental access, erasure/destruction, change, blocking, copying, provision and distribution of personal data, as well as against other illegal actions or operations with personal data according to the requirements set forth in art. 19, Federal Law No. 152-FZ On Personal Data dated July 27, 2006.

#### **5. Responsibility**

In case of violation of the requirements established by the laws of the Russian Federation, AURUS LLC, employees and other persons having access to personal data shall bear disciplinary, administrative, civil and criminal responsibility or liability according to the federal laws of the Russian Federation.

#### **6. Final Provisions**

This Policy shall become effective after its approval and remain in force indefinitely. Changes to the Policy shall be introduced through individual acts by AURUS LLC.

This Policy is unrestrictedly available to all interested persons or parties, including personal data subjects and authorities supervising the personal data matters.