

Personal Data Processing Policy of Pumori-Energy Ltd.

1. GENERAL

1.1. The Personal Data Processing Policy (hereinafter, the Policy) has been worked out in accordance with Federal Law No. 152-FZ of 27 July 2006 “On Personal Data” (hereinafter, FZ-152).

1.2. This Policy determines the procedures of personal data processing and measures to ensure personal data security in Pumori-Energy Ltd. (hereinafter, the Processor) with the aim of protection of human and civil rights and freedoms in personal data processing, inter alia protection of the rights to privacy, personal and family secrets.

1.3. The following basic terms are used in the Policy :

- automated personal data processing: personal data processing with computing aids ;
- blocking of personal data: temporary suspension of personal data processing (with the exception of cases when processing is necessary to refine the personal data) ;
- personal data information system: an aggregate of personal data in databases and of information technologies and technical facilities making possible processing of such data ;
- depersonalization of personal data: actions resulting in impossibility to establish, without making use of additional information, that the given personal data belong to a particular personal data subject ;
- personal data processing: any action/operation or series of actions/operations performed with or without automation facilities with personal data, including collection, recording, systematization, accumulation, storage, refining (updating, alteration), extraction, usage, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data ;
- processor: a state body, a municipal body, a legal or natural person that organize and/or effect, independently or jointly with other persons, personal data processing, and also determine the purposes of personal data processing, the scope of personal data to be processed, and the actions/operations performed with the personal data ;
- personal data: any information relating to a natural person (personal data subject) directly or indirectly identified or identifiable ;
- personal data provision: actions directed at personal data disclosure to a specified person or a specified range of persons ;
- personal data distribution: actions directed at personal data disclosure to an unspecified range of persons (personal data transfer) or at familiarization with personal data of an unlimited range of persons, including making personal data public in mass media, placement in information and telecommunications networks or provision of access to personal data in any other way ;
- cross-border personal data transfer: personal data transfer to the territory of a foreign state to a body of power of the foreign state, or to a foreign natural or a foreign legal person ;

- personal data destruction: action resulting in impossibility to restore the content of personal data in the personal data information system and/or in destruction of physical carriers of personal data.

1.4. The company shall publish or otherwise provide unlimited access to this Personal Data Processing Policy in accordance with P. 2, Art. 18.1, FZ 152.

2. PRINCIPLES AND CONDITIONS OF PERSONAL DATA PROCESSING

2.1. Principles of personal data processing

2.1.1. Personal data processing by the Processor is based on the following principles :

- legality and equitable basis ;
- limiting personal data processing to achieving concrete, predetermined, and lawful aims ;
- non-admission of personal data processing incompatible with the purposes of personal data collection ;
- non-admission of Integration of databases containing personal data processing of which is effected for purposes incompatible between one another ;
- processing of only those personal data which answer the purposes of such processing ;
- correspondence of the content and amount of personal data being processed to the declared purposes of processing ;
- inadmissibility of processing personal data that are redundant with respect to the declared purposes of processing thereof ;
- ensuring accuracy and sufficiency of personal data, as well as their being up to date with respect to the purposes of the personal data processing ;
- destruction or depersonalization of personal data upon the processing purposes having been achieved, or if achieving such aims has become unnecessary, or if eliminating any personal data breach by the Processor is impossible, unless otherwise provided for by federal law.

2.2. Conditions of personal data processing

2.2.1. The Processor shall perform personal data processing given at least one of the following conditions :

- personal data processing is effected with the personal data subject's consent to have his/her personal data processed ;
- personal data processing is necessary for achievement of the purposes provided for by international legislation or a law, for exercise and fulfilment of functions, powers and duties imposed by the Russian Federation legislation on the processor ;
- personal data processing is necessary for administration of justice, execution of a judicial act, or of an act of another body or an official if such acts are subject to execution in accordance with Federal Law No. 229 of 2 October 2007 "On execution of judgement" ;
- personal data processing is necessary for performance of a contract a party, or a beneficiary, or a guarantor to which the personal data subject is, and also for conclusion of a contract at

the personal data subject's initiative or a contract under which the personal data subject is to be beneficiary or guarantor ;

- personal data processing is necessary for exercise of rights and legitimate interests of the processor or third parties, or for achievement of socially-relevant aims on condition that the rights and freedoms of the personal data subject are not violated ;
- personal data are processed access to which of an unlimited range of persons has been granted by, or at the request of, the personal data subject (hereinafter, generally available personal data) ;
- personal data are processed which are subject to publishing or obligatory disclosure in accordance with federal law.

2.3. Confidentiality of personal data

2.3.1. The Processor and other persons obtaining access to personal data shall not disclose personal data to third persons and not distribute such data without the personal data subject's consent unless otherwise provided for by federal law.

2.4. Generally available personal data sources

2.4.1. For the purpose of information support, the Processor may have generally available sources of personal data of personal data subjects, including directories and address books. The following data may be included in generally available personal data sources on condition of the personal data subject's written consent: his/her surname, given name, patronymic, date and place of birth, work capacity, contact telephone numbers, e-mail address, and other personal data communicated by the personal data subject.

2.4.2. Information about a personal data subject shall be at any time removed from generally available personal data sources at the demand of the personal data subject or of an authorized body in charge of protection of personal data subjects' rights, or by decision of a court.

2.5. Special categories of personal data

2.5.1. Processing by the Processor of special categories of personal data concerning race, ethnicity, political views, religious or philosophical convictions, state of health, intimate life shall be permitted if :

- the personal data subject has given consent to processing of his/her personal data ;
- the personal data subject has made the personal data generally available ;
- the personal data processing is necessary for protection of the life, health or other vital interests of the personal data subject or of the life, health or other vital interests of other persons and it is impossible to obtain the personal data subject's consent ;
- the personal data processing is necessary in order to establish or exercise the rights of the personal data subject or third persons as well as in connection with administration of justice ;
- personal data processing is effected in accordance with legislation on compulsory classes of insurance.

2.5.2. Processing of special categories of personal data being effected in cases provided for in Item 4, Article 10, FZ-152 shall be immediately stopped if the causes of the processing have been eliminated, unless otherwise provided for by federal law.

2.5.3. Processing personal data on record of conviction may be effected by the Processor only where and as provided for in federal laws.

2.6. Biometric personal data

2.6.1. Biometric personal data, i. e. data characterizing physiological and biological peculiarities of a person enabling his/her identification may be processed by the Processor only on condition of the personal data subject's written consent.

2.7. Commissioning another person with personal data processing

2.7.1. The Processor has the right to commission another person with personal data processing with the consent of the personal data subject, unless otherwise provided for in federal law, on the basis of a contract made with such person. The person effecting personal data processing under the Processor's commission shall observe the principles and rules of personal data processing provided for in FZ-152 and this Policy.

2.8. Processing personal data of citizens of the Russian Federation

2.8.1. In accordance with Article 2 of Federal Law No. 242-FZ of 21 July 2014 "On amendments to certain legislative acts of the Russian Federation in what pertains to clarifying the procedure for personal data processing in information and telecommunications networks", the Processor shall, when collecting personal data, inter alia through the Internet information and telecommunications network, ensure recording, systematizing, accumulating, storing, refining (updating, altering), extracting personal data of citizens of the Russian Federation using databases located in the territory of the Russian Federation, except in cases when :

- personal data processing is necessary for achievement of the purposes provided for by international legislation or a law, for exercise and fulfilment of functions, powers and duties imposed by the Russian Federation legislation on the processor ;
- personal data processing is necessary for administration of justice, execution of a judicial act, or of an act of another body or an official if such acts are subject to execution in accordance with the Russian Federation legislation on execution of judgement (hereinafter, execution of a judicial act) ;
- personal data processing is necessary to exercise the powers of federal executive power bodies, bodies of state extrabudgetary funds, executive bodies of state power of the subjects of the Russian Federation, local self-governments bodies and the functions of organizations participating in the provision of state and municipal services, respectively, provided for by Federal Law No. 210-FZ of 27 July 2010 "On organization of provision of state and municipal services", municipal services, including registration of the personal data subject on the unified portal of state and municipal services and/or regional portals of state and municipal services ;
- personal data processing is necessary to effectuate professional journalist activities, and/or legitimate activities of mass media, or scientific, literary or other creative activities on condition that in doing so, the rights and legitimate interests of the personal data subject are not violated.

2.9. Cross-border personal data transfer

2.9.1. The Processor shall satisfy itself that the foreign state to the territory of which the personal data transfer is contemplated to be effected ensures adequate protection of the rights of personal data subjects, before the start of such transfer.

2.9.2. Cross-border personal data transfer to the territories of foreign states failing to ensure adequate protection of the rights of personal data subjects may be effected in cases of :

- existence of the personal data subject's written consent to cross-border transfer of his/her personal data ;
- performance of a contract, a party to which the personal data subject is.

3. RIGHTS OF A PERSONAL DATA SUBJECT

3.1. Consent of a personal data subject to have his/her personal data processed.

3.1.1. The personal data subject shall take the decision on providing his/her personal data and give consent to such data to be processed freely, of his/her own will, and in his/her own interests. Consent to personal data to be processed may be given by the personal data subject or his/her representative in any form permitting to confirm the fact of its having been obtained, unless otherwise provided for by federal law.

3.2. Rights of a personal data subject

3.2.1. The personal data subject shall have the right to obtain, from the Processor, information concerning processing of his/her personal data, unless such right is limited in accordance with federal laws. The personal data subject shall have the right to demand that the Processor refine, block or delete the subject's personal data if such data are incomplete, obsolete, inaccurate, unlawfully obtained or not necessary for the declared purposes of processing, and shall furthermore have the right to take measures provided for by law to protect his/her rights.

3.2.2. Personal data processing for the purposes of marketing of goods, work, services in the market through direct contacts with the personal data subject (a potential consumer) with the aid of communication means as well as for the purposes of political agitation shall be permissible only on condition of the personal data subject's prior consent.

3.2.3. The Processor shall immediately stop personal data processing for the above-mentioned purposes at the respective personal data subject's demand.

3.2.4. It is prohibited to take decisions on the exclusive basis of automated personal data processing if such decisions would generate legal consequences regarding the personal data subject or otherwise affect his/her rights and legitimate interests, except in cases provided for by federal laws or when appropriate written consent is given by the personal data subject.

3.2.5. If the personal data subject considers that the Processor effects processing of such subject's personal data with violation of the requirements of FZ-152 or otherwise violates the subject's rights and freedoms, then such personal data subject has the right to challenge the Processor's actions or omission to act in the Authorized Body in charge of protection of personal data subjects' rights or in a judicial proceeding.

3.2.6. The personal data subject shall have the right to protection of his/her rights and legitimate interests, including compensation for damages and/or moral harm.

4. ENSURING SECURITY OF PERSONAL DATA

4.1. Security of personal data processed by the Processor shall be ensured by implementation of legal, organizational and technical measures necessary to support fulfilment of the requirements of the federal legislation in the sphere of personal data protection.

4.2. To prevent unauthorized access to personal data the Processor shall take the following organizational and technical measures :

- appointment of officials responsible for organization of personal data processing and protection ;
- limitation of the list of persons admitted to personal data processing ;
- familiarization of subjects with the requirements of federal legislation and the Processor's normative documents on personal data processing and protection ;
- organization of record-keeping, storage, and circulation of carriers containing information with personal data ;
- identification of personal data security threats during their processing, forming threat models on the basis thereof ;
- development, on the basis of the threat model, of a personal data protection system ;
- use of information protection tools that have passed the procedure of evaluation of compliance with the requirements of the Russian Federation legislation in the sphere of information security when use of such tools is necessary for neutralization of immediate threats ;
- checking of readiness and use efficiency of information protection tools ;
- differentiation of user access to information resources, and software&hardware for information processing ;
- logging and record-keeping of actions of users of personal data information systems ;
- use of antivirus tools and recovery tools of the personal data protection system ;
- use of firewall, intrusion detection, vulnerability analysis, and cryptographic information protection tools, when necessary ;
- organization of access control to the territory of the Processor, guarding of premises with technical means of personal data processing.

5. CONCLUDING PROVISIONS

5.1. Other rights and obligations of the Processor in connection with personal data processing are determined by the legislation of the Russian Federation in the sphere of personal data.

5.2. Employees of the Processor guilty of violating the rules governing personal data processing and protection shall bear pecuniary, disciplinary, administrative, civil-law, criminal responsibility according to the procedures established by federal law.