

Annex
to the President's order
No Y-028/19
dated 09.04.2019

POLICY
of
Sistema
Public Joint Stock Financial Corporation
on Personal Data Processing and Protection

2019

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1. Purpose of the document

1.1. The Policy of Sistema PJSFC (hereinafter, "the Corporation") on Personal Data Processing and Protection (hereinafter, "the Policy") was developed in accordance with the requirements of the Federal Law "On Personal Data" No 152-FZ dated 27 July 2006 (hereinafter, "the Federal Law"), the Constitution of the Russian Federation and the international treaties to which it is a party, as well as other Russian federal laws and regulations in the area of personal data (hereinafter, "PD").

1.2. This Policy determines the main principles, purposes, methods and conditions of PD processing, the lists of PD subjects, the rights and responsibilities of the Corporation with regard to PD processing, the rights and responsibilities of PD subjects and PD protection requirements and measures adopted and implemented by the Corporation.

2. Terms and definitions

Automated data processing: processing of personal data using computer technologies.

Protection of personal data: a set of technical and organisational activities aimed at ensuring PD security and protecting the information related to a PD subject that is identified or may be identified on the basis of such information.

Personal data IT system: (hereinafter, "PD IT system") is an information system which comprises the PD contained in the database, as well as information technologies and technological means making it possible to process such PD using automation solutions or otherwise.

Confidentiality of personal data: a mandatory requirement applied to an operator or another person with access to personal data to ensure that no personal data is disclosed to third parties or disseminated without the consent of the PD subject or other lawful grounds.

Sistema Group companies: companies in which the Corporation has the right to determine their decisions and/or participate in their management owing to a majority shareholding in their authorised capital or on the basis of an agreement with such companies or otherwise.

Depersonalisation of personal data: actions that make it impossible to identify the subject of specific PD without obtaining additional information.

Processing of personal data: any action (operation) or a set of actions (operations) related to PD performed with or without the help of automation tools, including collection, recording, systematisation, accumulation, storage, amendment (update, change), retrieval, use, transfer (dissemination, provision, access), depersonalisation, blocking, deletion, and destruction of PD.

Operator: An individual who, independently or jointly with other parties, organises and (or) performs the processing of personal data and determines the purposes of personal data processing, the contents of personal data to be processed and the actions (operations) to be taken with regard to personal data;

Personal data: Any information related to an individual (personal data subject) who is identified or identifiable based on such information, including his/her family name, first name, patronymic name, date and place of birth, address, marital status, social status, financial situation, education, profession, income, and

other information.

Dissemination of personal data: actions aimed at disclosing PD to an unlimited number of persons.

Provision of personal data: actions aimed at disclosing PD to a certain person or a certain number of persons.

Employee: An individual employed by the Corporation under an employment agreement.

Personal data subject: An individual whose PD is processed by the Corporation in compliance with the provisions of existing laws of the Russian Federation and internal regulations of the Corporation.

Cross-border transfer of personal data: transfer of PD to foreign government authorities, foreign citizens or foreign legal entities.

Destruction of personal data: actions which make it impossible to recover PD from the PD IT system and (or) as a result of which PD storage media are destroyed.

3. General principles of personal data processing

The processing of PD at the Corporation is performed with a view to ensure the protection of rights and freedoms of the Corporation's Employees and other PD subjects, including the right to privacy of personal and family life, on the basis of the following principles:

3.1. PD shall be processed by the Corporation fairly and lawfully;

3.2. PD shall be selected for processing on the basis of their relevance for the purpose of processing;

3.3. PD processing shall be limited by achievement of specific predetermined and lawful purposes;

3.4. The contents and volume of processed PD shall be consistent with the declared purposes of processing. It shall not be allowed to process PD that is not necessary for the declared purposes of processing;

3.5. It shall not be allowed to process PD that is not consistent with the purposes of PD collection;

3.6. It shall not be allowed to combine data bases containing PD that are processed for incompatible purposes;

3.7. PD shall be processed in a manner that ensures the accuracy and sufficiency of personal data and, in specific cases, the relevance of PD with respect to the purposes of PD processing. The Corporation shall take or procure to be taken all necessary measures to destroy or update inaccurate or incomplete PD;

3.8. Personal data shall be kept in a form which permits the identification of PD subjects for no longer than is necessary for the purposes for which the PD are processed unless the PD storage period is set out in the Federal Law or an agreement under which a PD subject is a party, beneficiary or guarantor;

3.9. The processed PD shall be destroyed or depersonalised as soon as the purposes of processing have been achieved or become irrelevant unless otherwise stipulated in the Federal Law.

4. Personal data processing purposes

The Corporation shall process PD with the following purposes:

- 4.1. Protection of life, health or other essential interests of PD subjects;
- 4.2. Maintaining the list of individuals and legal entities entitled to participate in the General Meeting of Shareholders;
- 4.3. Registration of shareholders for participation in the General Meeting of Shareholders, identification of persons on the basis of identity documents;
- 4.4. Maintaining a register of the owners of registered shares and making dividend payments to shareholders;
- 4.5. Election of the Board of Directors;
- 4.6. Disclosing information about the Corporation's governance bodies;
- 4.7. Payment of remuneration and compensation;
- 4.8. Signing of employment agreements and induction of new Employees;
- 4.9. HR administration (document control);
- 4.10. Payment of salaries, bonuses, holiday pay, and making additional payments;
- 4.11. Issue of entry passes to the guarded premises of the Corporation;
- 4.12. Issue of powers of attorney;
- 4.13. Assessment, training and development of Employees;
- 4.14. Organising corporate events;
- 4.15. Forming a succession pool;
- 4.16. Providing corporate mobile communication services;
- 4.17. Providing voluntary medical insurance policies;
- 4.18. Providing international travel and visa support;
- 4.19. Filling vacant positions at the Corporation;
- 4.20. Conducting control and audit procedures;
- 4.21. Performing tender procedures in compliance with the internal regulations of the Corporation;
- 4.22. Signing and fulfilling agreements between the Corporation and a Counterparty, and performing obligations arising from the contractual relations which are regulated by the laws of the Russian Federation or an agreement;
- 4.23. Ensuring compliance with tax, pension and other applicable legislation as part of employment and civil law relations;
- 4.24. Ensuring access control and safekeeping of assets at the Corporation;
- 4.25. Maintaining the insider list of the Corporation;
- 4.26. Other purposes that do not contradict the existing laws of the Russian Federation.

5. Procedures and conditions of personal data processing

- 5.1. The processing of PD at the Corporation is conducted by using automation tools (as part of PD IT systems or otherwise), as well as without using such automation tools.
- 5.2. The automated processing of PD is based on the transfer of PD via the internal Internet network of the Corporation.
- 5.3. The cross-border transfer of PD is performed subject to obtaining a written consent from the PD subject.

5.4. The Corporation shall transfer the processed PD to the government authorities on the basis of and in compliance with the existing laws of the Russian Federation.

5.5. The transfer of PD to third persons for processing shall be performed in compliance with the requirements of the existing laws of the Russian Federation as part of the agreements signed by the Corporation and PD subjects or on the basis of a written consent granted by the PD subject.

6. Personal data processing and storage period

6.1. The procedures governing the storage of PD processed by the Corporation are set out in the regulations of the Corporation in accordance with the Federal Law "On Personal Data".

6.2. The processing of PD shall stop as soon as the purposes of data processing have been achieved, there are no longer legal grounds for data processing, or the period of document archiving set out in the relevant laws of the Russian Federation and the internal regulations of the Corporation has expired.

6.3. Upon the expiry of PD processing period PD shall be destroyed or depersonalised unless otherwise provided for in the Federal Law or internal regulations of the Corporation. The storage of PD after the expiry of storage period shall be allowed only subject to PD depersonalisation.

7. Blocking of personal data

The grounds for blocking the PD of specific PD subjects shall include:

7.1. Receipt of an application or request from a PD subject, provided that there is a confirmed instance of PD inaccuracy, obsolescence or incompleteness, irrelevance for the declared purpose of processing, or unlawful actions relating to PD or illegal manner of obtaining such PD;

7.2. Receipt of an application or request from the legal representative of a PD subject, provided that there is a confirmed instance of PD inaccuracy, obsolescence or incompleteness, irrelevance for the declared purpose of processing, or unlawful actions relating to PD or illegal manner of obtaining such PD;

7.3. Receipt of an application or request from the authorised body for protection of PD subjects' rights, provided that there is a confirmed instance of PD inaccuracy, obsolescence or incompleteness, irrelevance for the declared purpose of processing, or unlawful actions relating to PD or illegal manner of obtaining such PD.

8. Destruction of personal data

The grounds for destroying the PD processed by the Corporation shall include:

8.1. Achievement of the purpose of PD processing;

8.2. The purpose of PD processing becoming irrelevant;

8.3. Withdrawal by the PD subject of a consent for PD processing with the exception of cases when the processing of such PD is mandatory according to the laws of the Russian Federation or a signed agreement;

8.4. Identification of unlawful actions with regard to PD and impossibility to rectify them within three business days from the date of such identification;

8.5. Expiry of the PD storage period established in the laws of the Russian Federation and the internal regulations of the Corporation;

8.6. Order issued by an authorised agency for protection of the rights of PD subjects, the Prosecutor's Office of Russia, or a court ruling.

9. Personal data subjects

The Corporation, being a PD operator, shall process the PD of the following categories of PD subjects:

9.1. Individuals being the shareholders of the Corporation and the shareholders/members of Sistema Group companies;

9.2. Members of/nominees for the Boards of Directors of the Corporation and Sistema Group companies and the governance and other bodies of the Corporation and Sistema Group companies (Management Board, Audit Review Commission, working groups, expert councils);

9.3. Employees of the Corporation;

9.4. Applicants for vacant positions at the Corporation;

9.5. Counterparties including the individuals and sole traders bound by a contractual relationship with the Corporation and/or conducting negotiations with the Corporation;

9.6. Counterparties including the representatives of the legal entities bound by a contractual relationship with the Corporation and/or conducting negotiations with the Corporation;

9.7. Insiders of the Corporation;

9.8. Visitors of the Corporation.

10. Rights and responsibilities of personal data subjects

PD subjects are entitled to:

10.1. Apply to the Corporation for information regarding the processing of PD relating to such PD subject;

10.2. Receive information with regard to the Corporation's being in possession of their PD containing, inter alia, the following:

10.1.2. Confirmation of the fact of PD processing by the Corporation;

10.2.2. Legal grounds for and purposes of PD processing;

10.2.3. PD processing methods used by the Corporation;

10.2.4. The name and address of the Corporation, information about the persons (excluding the employees of the Corporation) with access to personal data or entitled to receive personal data on the basis of an agreement signed with the Corporation or on the basis of the Federal Law;

10.2.5. The type of processed personal data related to a specific data subject and the source of such data unless a different procedure for provision of such data is provided for by the Federal Law;

10.2.6. PD processing and storage period;

- 10.2.7. The procedure for exercising the rights of PD subjects in accordance with the Federal Law;
- 10.2.8. Information about the past or future cross-border transfer of PD;
- 10.2.9. The company name or the surname, name and patronymic of the person or entity in charge of PD processing on behalf of the Corporation if such person or entity has been or will be set the task of PD processing;
- 10.3. Demand that any incomplete, inaccurate or obsolete PD be supplemented, rectified or erased;
- 10.4. Withdraw their consent to PD processing;
- 10.5. The procedure for withdrawing the consent to PD processing is set out in the consent to PD processing granted by the PD subject.
- 10.6. Contest in court any unlawful actions or omissions of the Corporation committed in the course of processing and protecting their PD;
- 10.7. Defend their rights and lawful interests, including the right to indemnification of losses and (or) compensation for moral injury, in court;
- 10.8. PD subjects may be responsible for providing the Corporation with accurate data and for timely updating the provided data.

11. Rights and responsibilities of the Corporation with regard to personal data processing

- 11.1. The Corporation shall:
 - 11.1.1. Process the PD of PD subjects in compliance with the principles and rules set out in the existing laws of the Russian Federation and internal regulations of the Corporation in the area of PD;
 - 11.1.2. Obtain a written consent of the Corporation's Employee prior to inclusion of the Employee's PD into the generally accessible PD sources, including the surname, name, patronymic, date of birth, profession and other PD provided by the Employee;
 - 11.1.3. Provide the PD subject or their authorised representatives upon their request with information on whether the Corporation is in possession of PD related to the relevant PD subject;
 - 11.1.4. Grant the PD subject or their authorised representatives a free-of-charge access to the relevant PD within 30 days from the receipt of such request;
 - 11.1.5. In the event of denying the request of the PD subject for information regarding the Corporation's being in possession of any PD relating to the PD subject, within 30 days from the date of such application or request provide a substantiated written justification of such denial of information to the PD subject;
 - 11.1.6. Make necessary changes in the PD within 7 business days from the date of provision by the PD subject or their representative of information confirming that the PD is incomplete, inaccurate or outdated. Notify the PD subject or their representative of the introduced changes and take reasonable measures to notify the third parties which received the PD of relevant PD subject;
 - 11.1.7. Stop the processing of PD and destroy the relevant PD within 30 days from the date of achievement of the PD processing purpose unless otherwise

stipulated in the agreement between the Corporation and the PD subject or unless the Corporation has no right to process PD without the consent of the PD subject;

11.1.8. If the PD subject withdraws its consent to the processing of PD (and including of PD in the generally accessible sources), stop the processing of PD (erase the PD from the generally accessible sources) and destroy the PD within 30 days from the receipt of such withdrawal unless otherwise stipulated in the agreement between the Corporation and the PD subject or unless the Corporation has no right to process PD without the consent of the PD subject;

11.1.9. Submit to the authorised body in charge of protecting the rights of PD subjects the information and documents required by such body in its official capacity within 30 days from the date of relevant request.

11.2. The Corporation is entitled to:

11.2.1. Assign the task of PD processing to a third party subject to obtaining the consent of the PD subject unless otherwise provided for by the Federal Law or other laws of the Russian Federation, on the basis of an agreement signed with this third party, including a contract with a state or municipal authority, or by means of the passing of relevant laws by a state or municipal authority.

12. Cross-border transfer of personal data

The Corporation may perform cross-border transfer of personal data, including the transfer of data to a foreign state, to a government authority of a foreign state, or to foreign citizens or legal entities.

12.1. The cross-border transfer of personal data to foreign states being parties to the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data, and other foreign states ensuring adequate protection of the rights of PD subjects (the list of such countries is approved by an authorised body in charge of protection of the rights of PD subjects) may be performed without obtaining the written consent of the PD subject for cross-border transfer in view of the purposes of PD processing specified in clause 4 of the Policy.

12.2. The cross-border transfer of PD to the countries that do not ensure adequate protection of the rights of PD subjects shall be performed in the following cases:

12.2.1. The PD subject has granted a written consent to the cross-border transfer of their personal data;

12.2.2. Fulfilment of an agreement to which the PD subject is a party;

12.2.3. Protection of the life, health and other essential interests of the PD subject or other persons if it is impossible to obtain the written consent of the PD subject;

12.2.4. In the events provided for by the international treaties to which the Russian Federation is a party and by federal laws (if it is necessary to protect the constitutional order of the Russian Federation; ensure defence of the country and security of the state; guarantee a stable and secure operation of its transport sector; protect individuals, society and the state from acts of unlawful interference in the transport sector).

13. Personal data protection requirements adopted at the Corporation

When processing PD the Corporation shall take all necessary legal, organisational and technical measures to protect PD from illegal or accidental access to them by third parties, as well as to prevent PD destruction, change, blockage, replication, provision or dissemination, and other unlawful actions in relation to PD. Such measures taken by the Corporation shall include:

13.1. Appointment by the Corporation of an Employee responsible for organising PD processing.

13.2. Adoption of internal regulations on PD processing and protection aimed at prevention and identification of violations of the Russian laws and rectifying such violations.

13.3. Introduction of legal, organisational and technical measures to ensure PD protection.

13.4. Determining the list of positions at the Corporation the filling of which involves PD processing.

13.5. Performing internal control and (or) audit procedures to ensure that PD processing is done in compliance with the existing laws of the Russian Federation in the area of personal data processing.

13.6. Registration and recording of all operations involving personal data.

13.7. Ensuring that the Corporation's employees directly responsible for PD processing are familiar with the provisions of the laws of the Russian Federation in the area of personal data, including personal data protection requirements.

13.8. Performing PD processing within the guarded premises of the Corporation and organising physical protection of the PD storage media, as well as the venues and means of PD processing.

13.9. Organising access to the facilities used for PD processing and/or keeping PD storage media.

13.10. Determining threats to the integrity of personal data during data processing in information systems, developing, if necessary, the personal data protection system to be used for processing personal data in information systems, and establishing rules for obtaining access to personal data.

13.11. Identifying incidents of unsanctioned access to personal data and adoption of relevant measures.

13.12. Regular monitoring of the measures aimed at ensuring PD security in terms of compliance with the laws of the Russian Federation in the area of personal data and the local legislation supporting them.

14. Final provisions

14.1. The provisions of this Policy are binding on all the Employees of the Corporation having access to PD.

14.2. This Policy applies to all the PD processed by the Corporation and is a generally accessible document that should be made available on the official website of the Corporation.

14.3. The authorised body for protection of the rights of personal data subjects: Federal Service for Supervision of Communications, Information

Technology, and Mass Media (Roskomnadzor), Directorate for protection of the rights of personal data subjects.

14.4. Roskomnadzor agency for Moscow and the Moscow region: 117997, Moscow, 2 Starokashirskoye Shosse, bldg.10, GSP 7, Tel. (495) 587-44-85, fax: (495) 957-08-48, e-mail: rsockanc77@rkn.gov.ru, website: 77.rkn.gov.ru.