

Personal Data Processing and Protection Policy

MOSCOW, 2019

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1. Terms and Definitions

For the purpose of this document the following term definitions shall apply:

Company means Joint-Stock Company Rusagrotrans (JSC Rusagrotrans);

Personal data processing shall mean any action or a set of actions (operations) with personal data, performed with the use of automation tools or without using such means. Such actions (operations) may include collection, obtaining, recording, systematization, accumulation, storage, improvement (updating, alteration), extraction, utilization, transfer (distribution, providing, access), anonymization, blocking, deletion, destruction of personal data;

Personal data shall mean information that directly or indirectly relates an individual: surname, name, patronymic, year, date and place of birth, address, information on the marital, social, property status, information on the education, profession, information on the state of health, etc.;

Company Web-site is www.rusagrotrans.ru;

Subject of personal data shall mean an individual, visitor of the Company Web-site;

Cookie files shall mean small text-files saved by the browser when using the web-sites. It is possible to customize the procedure of using cookie files by means of browser's privacy settings (for more information on setting cookies, see the browser's reference manual).

2. General Provisions

2.1. This Personal data processing and protection policy (hereinafter referred to as Policy) establishes purposes, principles and rules of the personal data processing in JSC Rusagrotrans (hereinafter referred to as Company) and determines key measures taken by the Company to ensure personal data protection.

2.2. This Policy has been established with due regard to the requirements of the Constitution of the Russian Federation, Labor Code of the Russian Federation, Civil Code of the Russian Federation, Federal Law No. 152-Φ3 dated July 27, 2006 "On Personal Data", and other regulatory legal acts of the Russian Federation in the sphere of personal data protection and processing.

2.3. The Company carries out processing of personal data provided by the subject of personal data (individual) in the course of using the Web-site of the Company on any device and in the course of communication with the Company in any form in conformity with this Policy.

2.4. By using the Company Web-site, the subject of personal data gives its consent to its personal data processing and to the collection, analysis and utilization of cookie files in conformity with this Policy.

2.5. This Provision is subject to revision as necessary.

3. Principles and Conditions of Personal Data Processing

3.1. The Company carries out personal data processing keeping to the principles and rules stipulated by Federal Law No. 152-Φ3 dated July 27, 2006 "On personal data" and takes into account ensuring protection of rights and freedoms of subjects of personal data, namely:

- processing is carried out on the legal and equitable basis;
- processing is limited with the protection of specific, pre-determined and legitimate purposes; personal data processing that is unsuitable for the purposes of their collection is not permitted;

- it is not permitted to combine data bases that contain personal data processing of which is carried out for the purposes that are incompatible;
- only those personal data that conform to the processing purposes are subject to processing;
- content and volume of personal data processed shall conform to the declared purposes of processing; it is not permitted to process data that are excessive to the declared purposes;
- When processing, the accuracy and sufficiency of personal data are ensured, and topicality with respect to the processing purposes, if required. The Company takes measures on deletion or destruction of incomplete or inaccurate data;
- processed personal data are destroyed or anonymized either upon gaining the purposes of processing or in case when there is no necessity to gain these purposes, unless otherwise provided by the federal law;
- Processing of personal data is carried out in agreement with the subjects of personal data, unless otherwise provided by the legislation of the Russian Federation;
- Processing of personal data can be carried out using means of computer technology (automated processing) or under a direct participation of the individual without using means of computer technology (non-automated processing).

3.2. The Company carries out the collection of the following personal data of Subjects of personal data:

- provided in the course of filling information fields on the Company Web-site, including in the course of filling a form in the Contacts section, Feedback form, General Director Reception form, namely:
 - Surname Name Patronymic;
 - E-mail address;
 - Phone.
- provided in messages sent to the Company by subjects of personal data;
- technical data that are automatically transferred by the device by means of which subjects of personal data use the Company Web-site, including technical characteristics of the device, IP-address, information saved in cookie files, information on the browser, date and time of the access to the web-site, addresses of requested pages and other similar information;
- other data on subjects of personal data that they wished to leave on the Company Web-site.

3.3. Processing of personal data by the Company is carried out in agreement with the subject of personal data, unless otherwise provided by the legislation of the Russian Federation. When processing personal data, the Company is obliged to ensure their confidentiality.

3.4. The Company collects personal data in order to inform the subject of personal data on rendered services, to carry out questionnaires on the customer satisfaction, as well as by means of direct contacting using data provided on the Company Web-site.

3.5. The Company is entitled to engage another legal entity or sole proprietor to the procession of personal data with the consent of subjects of personal data based on the signed agreement. The legal entity or sole proprietor that process personal data under a commission of the Company are obliged to keep to the principles and rules of personal data processing stipulated by the legislation of the Russian Federation in the sphere of data protection.

4. Subjects of Personal Data

4.1. The Company processes personal data of subjects of personal data who visit the Company web-site.

4.2. The subject of personal data has the right to:

- receive exhaustive information related the processing of its personal data by the Company, except cases stipulated by the legislation of the Russian Federation;
- claim the correction of incorrect or incomplete personal data;
- claim blocking or destruction of its personal data if personal data are incomplete, outdated or inaccurate;
- withdraw the consent to the processing of its personal data;
- exercise other rights provided for by the legislation of the Russian Federation.

4.3. This consent of the personal data subject grants to the Company the right to carry out any actions with respect to personal data that are necessary and desired for gaining purposes indicated in paragraph 3.4., including without limitation, collection, systematization, accumulation, storage, itemization (updating, alteration), utilization, transfer, anonymization, blocking and destruction of personal data that include all data provided on the Company Web-site.

4.4. The consent to the processing of personal data is valid during 10 years or till its withdrawal by the subject of personal data.

4.5. To withdraw the consent to the processing of personal data, it is enough for the subjects of personal data to send a letter to the Company e-mail info@rusagrotrans.ru.

5. Responsibilities of the Operator

5.1. When processing the personal data, the Company is obliged to:

- take measures necessary for the fulfillment of operator obligations stipulated by the legislation of the Russian Federation in the sphere of personal data processing and protection;
- block illegitimately processed personal data;
- terminate processing of personal data in conformity with the legislation of the Russian Federation;
- provide at the request of the subjects of personal data or its representative information related processing of its personal data according to the procedure established by the legislation of the Russian Federation, local regulatory acts and other in-house documents of the Company.

6. Personal Data Security

6.1. To ensure safety of personal data during their processing, the Company takes necessary legal, organizational and technical measures to protect personal data against unauthorized or accidental access to them, their destruction, modification, blocking, copying, provision, distribution, as well as other illegal actions in relation to personal data.

6.2. The Company has adopted local acts on the issues of personal data safety. Employees of the Company who have access to personal data are familiarized with this Policy and local acts on the issues of personal data safety.

6.3. Personal data are stored on servers located on the territory of the Russian Federation.