

REGULATION
ON THE PROCEDURE FOR PROCESSING AND PROTECTION OF
PERSONAL DATA
AT VIST GROUP JSC

1. GENERAL PROVISIONS

1.1. This Regulation determines the purposes, conditions and procedures for personal data processing, as well as establishes the general requirements in order to ensure the protection of personal data processed by VIST Group JSC.

1.2. This Regulation is governed by the Constitution of the Russian Federation, and under the Labor Code of the Russian Federation, Federal Law No. 152-ФЗ dd. 27.07.2006 *On Personal Data*, Federal Law No. 149-ФЗ dd. 27.07.2006 *On Information, IT and Protection of Information*, Order of the Federal Service for Technical and Export Control of Russia No. 21 dd. 18.02.2013 (as amended by Order of the Federal Service for Technical and Export Control of Russia No. 49 dd. 23.03.2017) *On the Approval of the Composition and Content of Organizational and Technical Measures to Ensure the Safety of Personal Data when Processing using Informational Systems of Personal Data* (registered with the Ministry of Justice of Russia on 14.05.2013 under No. 28375), Convention of the European Council "On the Protection of Individuals with Regard to Automated Processing of Personal Data and Ensuring Adequate Protection of the Rights of Subjects of Personal Data" and other regulations.

1.3. This Regulation and amendments hereto shall be approved by the General Director of VIST Group JSC and enters into force by his/her order. This Regulation (amendments) enters into force upon issue of the relevant order and applies to relations arising after entry thereof.

1.4. This Regulation is binding to all employees of VIST Group JSC. All employees of VIST Group JSC shall familiarize themselves with this Regulation and amendments hereto by signature. Upon employment, employees shall familiarize themselves with this Regulation before the execution of the employment agreement.

BASIC CONCEPTS:

Personal data (PD) shall mean any information related to the individual – subject of personal data directly or indirectly identified or identified on the basis of such information.

Employee's personal data shall mean any information concerning a specific employee, including his/her professional and personal qualities, processed by the employer (VIST Group JSC) in regards to the performance of the employee as determined by laws. The employer shall take necessary measures to protect such data collected, as well as establish the relevant legal regime for such.

The Operator shall mean any public authority, municipal body, legal entity or individual organizing processing and (or) processing personal data independently or together with other persons, as well as determining purposes of personal data processing, composition of personal data subject to processing, and actions (transactions) taken with such personal data (par. 2 of Art. 3 of Federal Law No. 152-ФЗ dd. 27.07.2006 *On Personal Data*).

Subject of personal data shall mean an individual, whose personal data are processed by VIST Group JSC due to his/her activity (employees, individuals in work relations with VIST Group JSC, candidates for employment, customers, counterparties, etc.).

Depersonalization of personal data shall mean actions resulting in the impossibility to determine the belonging of personal data to a certain subject without the use of additional information.

Personal data processing shall mean any action (transaction) or a set of actions with personal data performed with or without the use of automation means, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (dissemination, provision, access), depersonalization, deletion, and/or destruction of personal data.

Automated processing of personal data shall mean the processing, including transactions performed, in full or in part, with the use of automated means, namely, storage, performance of logistic (or) arithmetic transactions with personal data, change, destruction, search or dissemination, as well as the transfer thereof to third parties.

Non-automated processing of personal data shall mean actions regarding the use, clarification (update, change), dissemination or destruction of personal data performed with the direct participation of a person with regard to each subject of personal data.

Trans-border transfer of personal data shall mean the transfer of personal data to the territory of a foreign state, to a public authority of a foreign state, foreign individual or foreign legal entity.

Blocking of personal data shall mean the temporary termination of personal data processing (except for cases when processing is required to clarify personal data).

Documented information shall mean information recorded on a material medium through the documentation of details that allows the determination of such information or its material medium.

Informational system of personal data shall mean a set of personal data contained in a database and/or IT and technical means allowing the processing thereof.

Use of personal data shall mean actions (transactions) with personal data performed by an Operator's officer(s) with the purposes of taking a decision or performing other actions arising in legal consequences with regard to employees or otherwise concerning their rights and freedoms or rights and freedoms of other persons.

Confidentiality of personal data shall mean the obligation of operators and other persons not to disclose to third parties and not to disseminate personal data without the consent of the subject of the personal data, unless otherwise permitted by federal laws.

Public personal data shall mean personal data, to which access is granted to the general public upon consent of the subject of PD, or the requirement to observe confidentiality does not apply to them in accordance with federal laws.

Provision of personal data shall mean actions aimed at the disclosure of personal data to a certain person or number of persons.

Destruction of personal data shall mean actions resulting in the impossibility to restore the content of personal data in the informational systems of personal data and (or) destruction of material media of personal data.

2. PRINCIPLES OF PERSONAL DATA PROCESSING

2.1. Legality of the purposes and ways of personal data processing

2.2. Conformity of the purposes of personal data processing to the purposes previously determined and stated at the collection of personal data.

2.3. Personal data being processed shall not be excessive in regard to the stated purposes of the processing thereof.

2.4. At personal data processing, accuracy, sufficiency and, in necessary cases, relevancy of personal data shall be ensured with regard to the purposes of personal data processing.

2.5. Combination of databases containing personal data, processing whereof is allowed for the purposes inconsistent among itself, is not allowed.

3. CATEGORIES OF SUBJECTS OF PERSONAL DATA

VIST Group JSC may process personal data of the following categories of subjects of PD:

3.1. Individuals, who were or are in employment relations with VIST Group JSC (customers, counterparties, etc.).

3.2. Individuals considered for vacancies with the possibility of employment in the Company (candidates).

3.3. Individuals seeking execution and performance of agreements regarding business activities of the Company (visitors).

3.4. Employees, who were or are in employment relations with VIST Group JSC.

4. COMPOSITION AND CATEGORIES OF PERSONAL DATA

4.1. Personal data of employees and candidates for vacancies in the Company, include, but are not limited to, the following information:

4.1.1. Information on the employee:

- given name, patronymic, surname, age, sex, and date of birth;
- passport data of a citizen of the Russian Federation;
- passport data of a foreign citizen;
- data on work permits;
- data on education, specializations, qualifications, work experience, and previous employment;
- data on advanced trainings and additional professional trainings, certifications;
- position(s) held or performed work;
- data on military service;
- data on employee's salary and other income;
- data on social security and benefits and grounds for obtaining them;
- data on the state of health of the employee and his/her family members, and results of all medical examinations, psychiatric evaluations, etc.;
- registered address and actual address of residence, home and cell phone numbers;
- data on his/her criminal record;
- data on disciplinary measures taken against employee;
- data on employee's incentives received;
- data on the employee's social status and/or benefits (disability, donor, pregnancy, member of a trade union, etc.);
- data on any compulsory and/or additional insurance of the employee and his/her family members;
- content of the employment agreement, work book, orders, T-2 personal card, as well as characteristics and other employment documents concerning the employee;
- data on his/her driver's license;
- photo;
- other required data on the employee.

4.1.2. Information on the marital status of the employee and his/her family members:

- children;
- state of health of family members;
- presence of employee's dependents;
- need to take care of an ill family member;
- adoption;
- other facts forming grounds for the granting to the employee any securities and compensations required by law.

4.2. Personal data of customers, counterparties and other persons include:

- given name, patronymic and surname;
- age, date and place of birth;
- citizenship;
- Pension Fund of Russia/INN (Taxpayer Identification Number);
- passport data or data of other accepted identification document;
- registered address and actual address of residence, home and cell phone numbers;
- other data on individuals obtained by VIST Group JSC in the course of its activity.

4.3. Categories of personal data

In accordance with Federal Law No. 152-Φ3 dd. 27.07.2006 "On Personal Data", the following categories of personal data are classified:

- special categories of personal data;

- public personal data;
- biometric personal data.

4.3.1. Special categories of personal data include the following:

- the state of one's health;
- race and nationality;
- political views;
- religious and philosophic beliefs;
- private life;
- criminal record.

Processing at VIST Group JSC of special categories of personal data, as well as personal data on employees' private life is allowed only upon written consent by the employee, and only permitted by law.

VIST Group JSC is not entitled to obtain and process employee's personal data on his/her membership in public organizations or his/her trade union activity, except where permitted by law, namely, for the purposes stated under the provisions of Art. 82, 373-376 of the Labor Code of the Russian Federation.

4.3.2. Public personal data

1) All personal data are confidential, except for public personal data. Dissemination of confidential personal data is not allowed without consent of that person.

2) Public personal data shall mean data that is freely accessible upon consent of that person or where indicated by law. Consent form for public personal data is given in Appendix 1.

3) To ensure integration of structural subdivisions and separate employees, a phone book of VIST Group JSC shall be formed, including employee's given name, patronymic, surname, structural subdivision, position and/or profession, as well as business and cell phone numbers. The said personal data shall be included into the book upon the employee's written consent in accordance with par. 4.3.2. (2) hereof.

4.3.3. Personal and family secrets of a person's personal data include:

- personal data on the private life of the person, state of health, and diagnosis of disease constitute confidential personal information of the person;
- personal data on the adoption, diagnosis of disease and state of health of family members of the person, and their private life constitute confidential family information.

4.3.4. Biometric personal data

In the course of its activity VIST Group JSC may process biometric personal data only upon written consent of the person, in the manner permitted under current laws.

Biometric personal data include data characterizing physiological features of a person, allowing the establishment of his/her identity, namely:

- fingerprints and palmprint;
- iris;
- DNA analysis;
- features of the body structure, its separate parts, and internal organs;
- handwriting, etc.

If necessary, to process biometric personal data beyond the informational systems, VIST Group JSC shall ensure observance of the requirements provided for by Decree of the Government of the Russian Federation No. 512 dd. 06.07.2008 "On the Approval of Requirements to Material Media of Biometric Personal Data and Technologies of Storage of Such Data Beyond the Informational Systems of Personal Data".

5. PERSONAL DATA PROCESSING

5.1. Purposes of personal data processing at VIST Group JSC

5.1.1. Purposes of processing employees' personal data at VIST Group JSC are:

- assistance to employees in employment, training and career development;
- ensuring employees' personal safety;

- control over the quantity and quality of the work being performed;
- execution of employment relations;
- performance of the labor function and remuneration;
- granting securities and benefits provided for by regulations that contain provisions of the labor law, agreements, local regulations, and employment agreements.

5.1.2. Purposes of processing customers' and counterparties' personal data are:

- the carrying out by VIST Group JSC of its activities;
- the provision of services to customers;
- the enacting of the terms and conditions of agreements with counterparties.

5.2. Requirements for personal data processing

5.2.1. Personal data shall be processed upon written consent by the person of personal data, except when permitted by par. 5.2.4 hereof.

5.2.2. Written consent of the subject of personal data shall include:

- name and registered address of the operator (VIST Group JSC);
- given name, patronymic, surname, registered address and actual address of residence of the person (employee), identity documents (number of the document, issue date and issuing authority);
- purpose and way of personal data processing;
- list of data, to the processing of which the person consents;
- list of actions, to which consent is granted;
- validity term of the consent and procedure for the revocation thereof;
- signature of the person.

In case of minor employees, consent for personal data processing shall be granted by parents, guardians or tutors. Consent form for personal data processing is given in Appendix 2.

5.2.3. To ensure its activity, VIST Group JSC may perform trans-border transfer of data of its employees. Employees' written consent to the trans-border transfer of personal data shall include:

- name and registered address of the operator (VIST Group JSC);
- given name, patronymic, surname, registered address and actual address of residence of the person (employee), identity documents (number of the document, issue date and issuing authority);
- name or given name, patronymic, surname and address of the person, to whom the subject transfers personal data;
- purpose and way of processing personal data of the subject;
- list of data, to the processing of which the person consents;
- list of actions, to which consent is granted;
- validity term of the consent and procedure for the revocation thereof;
- employee's signature.

Consent form for the trans-border transfer of personal data is given in Appendix 3.

5.2.4. Personal data may be processed without consent of the person in the following cases:

- to perform a civil and/or an employment agreement, the party to which is the person of the personal data;
- for statistical and scientific purposes subject to depersonalization of data;
- to protect an employee's life, health and other vitally important interests, and when procurement of consent from the subject is not possible;
- in other cases permitted by law.

5.2.5. Processing of PD of customers, counterparties, employees of VIST Group JSC for the purposes of promoting goods, as well as works and services in the market through direct contacts with potential consumers is allowed only upon prior written consent from the person of the personal data. Upon request from the person of personal data, processing of his/her personal data shall be terminated on the date of receipt of the relevant request.

5.3. Terms of personal data processing

Terms of personal data processing shall be determined in accordance with the validity terms of agreements with the persons of personal data, "List of typical managerial archival documents formed in the course of operation of public authorities, local self-governing authorities and organizations with the indication of the term of storage" approved by the Order of the Ministry of Culture of the Russian Federation No. 558 dd. 25 August 2010, as well as other requirements under law.

5.4. Procurement of personal data

When carrying out its activity, VIST Group JSC is entitled to obtain personal data in the manner permitted under law and this Regulation.

Rules to obtain personal data at VIST Group JSC are:

- scope and content of obtained data shall adhere to the Constitution of the Russian Federation and its federal laws;
- personal data shall be obtained from the person of personal data by him/herself;
- decisions concerning the interests of the person based on the data obtained, only as a result of their automated processing or electronic receipt, are not allowed.

5.5. Procedure for obtaining an employee's personal data

5.5.1. The obtaining of an employee's personal data from a third party is allowed only by the employee's written consent, if it is not possible to obtain information from himself/herself in the manner provided by par. 5.5.2 hereof.

5.5.2. To obtain personal data from third parties, an employee shall be notified in writing of the procurement of data from a third party, stating the purposes for obtaining, as well as their legal grounds, expected sources and ways of obtaining the personal data, nature of data subject for procurement, employee's rights and consequences of refusal to grant written consent to obtain the data.

5.5.3. Upon entering into employment with and employment at VIST Group JSC, a person may be requested to provide only those documents and data necessary to perform his/her work, and which do not contradict the Labor Code of the Russian Federation.

5.5.4. Upon the entering of an employment agreement, the employee shall provide: passport, work record book, insurance certificate for compulsory pension insurance, and documents of military registration, for those persons bound to military service.

5.5.5. If the work requires a certain level and type of education, documentation on education shall be provided. In case of first employment, work record book and insurance certificate shall be provided by VIST Group JSC.

5.5.6. Upon the entering of an employment agreement, the employee's personal file shall be created and will include copies of required and provided documents. A person's personal card shall contain data provided by the employee.

5.5.7. Processing of data of the person in regards to but not exclusive to pregnancy, disability, temporary inability to work, studies in educational institutions of primary, secondary and higher professional education, as well as data on his/her family members, such as minor children and ill family members in need of care, are permitted for the sole purpose of granting the employee those securities provided for under labor laws.

5.5.8. Securities and compensation provided for under the law shall be granted upon the receipt of the relevant information by VIST Group JSC.

5.5.9. The procurement of data on the employee's state of health is allowed only in regards to the employee's performance connected with his/her labor function, as well as for the purposes of protecting the life and health of the employees of VIST Group JSC and granting securities, compensations and other benefits provided for by law, along with any collective agreement, local regulation or employment agreement, namely:

- 1) medical examinations (preliminary, periodic, scheduled and unscheduled) and psychiatric evaluations in those cases permitted under Art. 69 and 213 of the Labor Code of the Russian Federation, as well as under other regulations;
- 2) term of an employee's temporary inability to work;
- 3) deterioration of the health, or damage, and injury in case of a production accident or occupational disease;
- 4) deterioration of the health of the employee and his/her family members entailing the need for a transfer, change of work schedule, or termination of the employment agreement;
- 5) disability of the employee and/or his/her family members;
- 6) pregnancy.

5.5.10. Upon the employee's written statement, within three business days from the date of filing a statement, he/she shall be provided with properly certified copies of those documents related to his/her work.

5.6. Storage and destruction of personal data

Personal data shall be stored in the manner excluding loss or unauthorized use thereof.

All personal data shall be kept in a place with no access thereto of unauthorized persons (in safes or other cupboards with a lock).

VIST Group JSC shall ensure storage of documentation on primary accounting, labor and remuneration, use of work time, as well as other documents constituting an employees' personal data. Personal files shall be archived within terms established by law.

Upon achievement of the purposes of personal data processing, data shall be destroyed, except in the following cases:

- personal data shall be stored as required by Regulations;
- any candidate who desires to remain on the list of potential employees during a certain term as determined by the agreement;

VIST Group JSC shall keep and store work record books in accordance with the Labor Code of the Russian Federation and Decree of the Government of the Russian Federation No. 225 dd. 16.04.2003 "On Work Record Books".

5.7. Transfer of personal data

Personal data may be transferred both to VIST Group JSC and to other persons in the manner established by the laws of the Russian Federation and this Regulation.

To transfer personal data to third parties, VIST Group JSC shall observe the following requirements:

- 1) personal data shall be provided only upon written consent from the person, including for commercial purposes. Exceptions may be made for those cases provided for by law and this Regulation;
- 2) procurement of personal data without written consent of the person of personal data is possible in cases when the provision of personal data is necessary to prevent a threat to one's life and/or health (namely, in case of a work related accident) and in the other cases as established under federal laws;
- 3) warning a person with access to personal data on the possibilities of using data for the sole purposes as determined by VIST Group JSC;
- 4) observance of the confidentiality procedures by any recipients of personal data.

At VIST Group JSC, personal data may be provided only by authorized persons in accordance with the list approved in the manner determined herein and only in the scope necessary for them to perform certain functions.

In other cases, employee's personal data, including information on salary, shall be provided only upon his/her written consent and is to be done in accordance with par. 5.2.2 hereof.

Without an employee's written consent, his/her personal data shall be provided to:

- the Pension Fund of the Russian Federation;
- the Social Insurance Fund;
- tax inspectorates;
- law enforcement agencies;
- military commissariat;
- other authorities and institutions in those cases permitted by law.

Scope and content of personal data provided to the said authorities and institutions shall be determined in the manner established by law.

5.8. Automated processing of personal data at VIST Group JSC

When using automated processing of personal data, decisions based only on automated processing are not allowed if such a decision can lead to certain legal consequences, as well as concerns the rights and legitimate interests of its subject.

Decisions based only on the automated processing of personal data are allowed only upon consent of the person.

The person, with regards to their personal data, may object to a decision only on the basis of automated processing of his/her personal data. VIST Group JSC shall consider provided objection and notify the subject of the results of the consideration thereof within seven business days.

Non-automated processing of personal data at VIST Group JSC

Regarding non-automated processing, personal data shall be recorded on separate media materials. Different categories of personal data shall also be recorded on or from different media materials.

Persons performing non-automated processing of personal data shall be notified of the features of such processing in advance. Liability for timely notification shall be borne by the heads of the relevant structural subdivisions.

Access to the territory of VIST Group JSC shall be granted only by entering records on the person(s) into the visitor's log provided said person(s) provide(s) approved identity documents.

Control over and record of visits shall be made for the following purposes:

- ensuring employees' safety and integrity of the property of VIST Group JSC;
- prevention of offences;
- control over timely arrival to and leaving of the workplace by the employees of VIST Group JSC.

Access to the book of records is possible upon request of the General Director of VIST Group JSC from the Lessor's employees.

The book shall be kept and stored by the Lessor's employees.

The visitor's log shall contain the following data:

- given name, patronymic, surname of the visitor entering the territory of VIST Group JSC, passport data;
- purpose, time and date of visit, time of leaving the territory;
- officer, to whom the visitor has come.

Recording in the book shall be made by the Lessor's employee on duty in his/her own handwriting.

Access to the territory of VIST Group JSC shall be granted upon a pass. Visitors shall be provided with temporary passes with the validity term of that work day.

Copying information contained in the visitor's log is not allowed, except as evidence of a violation of the labor agreement by a certain employee.

6. PERSONAL DATA PROTECTION

6.1. Principles of personal data protection at VIST Group JSC

Personal data may not be used to control behavior of its subjects, for the purposes of discrimination, moral and (or) financial damages, or impeding one from exercising their rights and freedoms.

When taking decisions concerning the interests of the subject, it is not allowed to be based on the data obtained solely by automated processing or electronic procurement thereof.

Ensuring confidentiality of personal data

The subject of personal data is not required to waive his/her rights to the protection of confidential personal and family data.

VIST Group JSC shall protect personal data at its own expense.

Forbidden to abuse the right of personal data processing and provisions.

6.2. Personal data protection system at VIST Group JSC shall be implemented for the purposes of:

Prevention of leaks, theft, loss, distortion, falsification or other unauthorized actions in regards to information constituting personal data;

Prevention of threats to the safety of the said person of personal data, his/her family members, as well as society and the state in general.

Protection of the constitutional rights of individuals in the keeping of personal secrets and confidentiality of personal data available in the informational systems and keeping them secret.

Ensuring the rights of the person in the field of personal data.

Ensuring the integrity of the property of VIST Group JSC and its employees.

6.3. Methods and ways of personal data protection in the informational systems of personal data shall be executed in accordance with the Decree of the Government of the Russian Federation No. 1119 dd. 01.11.2012 "On the Approval of Requirements to Personal Data Protection at Processing Thereof in the Informational Systems of Personal Data" at processing thereof in the informational systems of personal data and Order of the Federal Service for Technical and Export Control of Russia No. 21 dd. 18.02.2013 as amended by the Order of the Federal Service for Technical and Export Control of Russia No. 49 dd. 23.03.2017 "On the Approval of the Composition and Content of Organizational and Technical Measures to Ensure Safety of Personal Data at Processing in the Informational Systems of Personal Data" registered with the Ministry of Justice of Russia on 14.05.2013 under No. 28375 through;

- implementation of the system of granting access to the users (servicing staff) to informational resources, informational system and works, documents related to the use thereof;
- restriction of visitors' access to premises, where technical means allowing personal data processing are placed, as well as media information are stored;
- differentiation of access of users and servicing staff to informational resources, software to process (transfer) and protect information;
- registration of actions of users and servicing staff, control over unauthorized access and actions of users, servicing staff and third parties;
- organization of the records and storage of portable media of information and circulation thereof excluding theft, replacement and destruction;
- reservation of technical means, duplication of arrears and media of information;
- use of means to protect information that have undergone the conformity assessment procedure in the established manner;
- use of the protected communication channels;
- placement of technical means allowing personal data processing within the protected territory;
- organization of physical protection of the premises and actual technical means that allow for personal data processing;
- prevention of introduction of malicious programs (viruses) and bugs into informational programs.

Method and ways of personal data protection in the informational systems shall be chosen and ensured by the authorized officer to be appointed by the order of the General Director of VIST Group JSC.

6.4. VIST Group JSC shall take the following measures to protect personal data:

- development of provisions on personal data protection;
- determination and record of the list of information constituting personal data;
- restriction of access to information constituting personal data through the establishment of the manner and treatment of such information and control over observance thereof;
- keeping record of persons with access to information constituting personal data and (or) persons, whom such information has been provided or transferred;
- execution with persons with access to personal data of employment and civil agreements and non-disclosure agreements;
- marking material media (documents) containing information constituting personal data as confidential;
- training and check of the awareness of the provisions and requirements in the field of personal data protection;
- organization of and keeping confidential document management;

- application of means and methods of technical protection of confidential information (installation of locks, grids, different mechanical, electric and electronic means of protection).

6.5. Persons responsible for ensuring confidentiality of personal data

Persons with access to personal data are responsible for the processing thereof and shall take necessary measures in preventing familiarization of personal data by persons without access to personal data.

Persons responsible for ensuring confidentiality of personal data include the General Director, heads of structural subdivisions, office manager(s), staff director(s), financial director(s) and other structural subdivisions engaged in the procuring, processing, storage, use and transfer of personal data of the employees of VIST Group JSC.

Specific list of persons with access to personal data and processing them shall be approved by order of the General Director. The order shall determine the grounds and purposes obtaining and processing of personal data, terms of use, conditions and other requirements. Access to personal data shall be granted only after proper access procedures have been followed as determined in par. 6.5.1 hereof.

Heads of structural subdivisions are entitled to obtain and process personal data concerning employees of the structural subdivision regarding issues of performance by them (employees) in relation to their labor duties.

6.5.1. Access to confidential personal data includes:

- 1) familiarization of the employee with the laws on personal data protection, including obtained personal data, liability for violation thereof and local regulations of VIST Group JSC in the field of personal data protection;
- 2) assuming responsibility by the employee of the obligations to observe confidentiality of personal data, to which he/she has access;
- 3) assuming responsibility regarding the obligations not to disclose confidential data after termination of employment relations for the duration of the confidentiality regime of such data;
- 4) observance of the requirements on the protection of confidential information;
- 5) assuming responsibility regarding the obligation not to use confidential data without consent of their holders in relation to their activities that are unrelated to the activities of VIST Group JSC.

Access procedure shall be performed before entering into the employment agreement by the employee of the staff department, as well as after employment of the employee, if the need for access occurs after entering into the employment agreement.

6.5.2. With any persons granted access to personal data and the processing of it an employment agreement and/or additional agreements thereto with the condition to ensure confidentiality of personal data shall be entered into.

If the performance of work is related to the access of confidential information, and the person refuses to assume the responsibility to keep data confidential, an employment agreement shall not be entered into.

Persons, whose work duties are not related to personal data processing, may be granted access to personal data only upon appropriate written consent.

In case of unintentional receipt of personal data by an authorized person, an agreement on ensuring confidentiality of the obtained personal data shall be signed by him/her. Intentional receipt of personal data by any unauthorized persons shall form the ground for bringing disciplinary action as provided for by law.

Timely and legal execution of agreements and agreements on ensuring confidentiality of personal data shall be executed by the employees of the staff department.

6.6. Training and checking of employees on their awareness of all provisions and requirements in the field of personal data protection

Training and checking of employee awareness in the field of personal data protection shall be performed at least once a year.

Unscheduled training and checks of employee awareness shall be performed in cases of amendments to the laws on personal data protection, as well as amending and supplementing local regulations of VIST Group JSC on the issues of personal data protection and processing.

Employee's refusal to undergo training and checks of awareness of personal data protection forms the ground for disciplinary action.

6.7. Organization of and keeping confidential document management

All documents containing confidential personal data shall be kept strictly confidentiality and shall be available only to persons with access to such data by virtue of their work duties. Organization of confidential document management shall exclude familiarization with confidential information by other persons without such access.

Any person responsible for the recording, storing and using of confidential personal data shall be appointed by the order of the General Director.

When dealing with documents containing confidential personal data, it is not allowed to:

- make extracts without the relevant permission of the responsible person;
- familiarize unauthorized persons, including other employees, with confidential documents;
- use information from such documents in open messages, reports, correspondence, or advertising publications;
- provide computers or other electronic medums to other employees for work;
- leave unattended confidential documents, on a turned on computer at the work place.

Upon dismissal of the employee responsible for confidential documents, they shall be transferred upon the execution of an acceptance certificate.

7. RIGHTS AND OBLIGATIONS IN THE FIELD OF PERSONAL DATA PROCESSING AND PROTECTION

7.1. Subjects of personal data are entitled to:

- 1) access to their personal data that are in the possession of VIST Group JSC;
- 2) obtain information on:
 - their personal data and way of processing thereof;
 - automated processing of personal data (existence of the automated file of data, purposes of such processing);
 - trans-border transfer of personal data.
- 3) obtain a copy of documents in accordance with par. 5.5.10 hereof;
- 4) assistance from their representatives in the exercising of the rights of the person of personal data;
- 5) mandatory deletion of mistakes in their personal data through:
 - change, clarification and supplemental data;
 - deletion and (or) termination of processing obsolete, inaccurate and illegally obtained data;
 - notification by VIST Group JSC to all persons, whom inaccurate, incomplete or obsolete data have been rectified, as well as notification on all changes, supplements and clarifications;
 - amending and supplementing the work record book;
 - providing data in a form available to the employee;
- 6) protection against unauthorized actions (omissions) with regard to their personal data through:
 - determination of representatives for the protection thereof;
 - going to court.
- 7) Familiarization against signature with this Regulation and other local regulations concerning their labor function.

7.1.1. In case of refusal to correct personal data, the employee shall be entitled to state in writing his/her disagreement with the justification thereof.

7.1.2. The employee may not be provided data that can violate the constitutional rights and freedoms of other persons, as well as in other cases provided for by law.

7.2. The employee shall:

- notify in a timely manner, to his/her immediate superior, head of the structural subdivision and (or) staff director, information on the impossibility to perform his/her job duties in a timely manner, impossibility to come to

work due to temporary inability to work, studies in an educational institution, performance of state and (or) public duties, donation of blood and its components and/or other circumstances impeding their ability to perform their work duties;

- notify the staff director of changes in their personal details within two weeks from the date of such changes;
- immediately notify their immediate supervisor of those situations that threaten the life and health of people, integrity or property;
- undergo training and checks of their awareness in the field of personal data protection;
- observe this Regulation;
- keep confidential obtained personal data, including after termination of employment relations with VIST Group JSC;
- upon termination of the employment agreement, they shall transfer to the authorized person all material of personal data that they have in their possession.

7.3. Rights and obligations of VIST Group JSC regarding personal data protection

7.3.1. VIST Group JSC is entitled to:

- obtain accurate personal data from the person of personal data in the cases and manner established by the laws of the Russian Federation and this Regulation;
- bring disciplinary action, in accordance with the laws and this Regulation, against any person(s) that violate(s) the rules on personal data processing and procurement;
- bring other types of disciplinary action and/or charges that are in accordance with the laws of the Russian Federation, e.g., civil, administrative and criminal liability. The employee may be held responsible and be prosecuted, not at the initiation of the employer, but by a court or relevant government agencies.

7.3.2. VIST Group JSC shall:

- take measures to protect personal data in the scope and manner provided for by law and this Regulation;
- obtain and process personal data in the manner established by law and this Regulation;
- ensure the training and checking of the employee's awareness of the provisions and requirements in the field of personal data protection;
- familiarize the employee, through a signature, with this Regulation and other local regulations on the rules and regulations of personal data protection and processing;
- appoint a person responsible for the organization of personal data protection and subordinate to the General Director.

Person responsible for the organization of personal data protection shall, namely:

- 1) have internal control over the adhering to, by VIST Group JSC and its employees, the laws of the Russian Federation on personal data, including requirements on personal data protection;
- 2) bring to the attention of the employees of VIST Group JSC provisions of the laws of the Russian Federation on personal data, local regulations on personal data protection, and requirements on personal data protection;
- 3) organize acceptance and processing of applications (requests) of the person(s) of personal data or their representatives and/or exercise control over the accepting and processing of such applications and requests.

8. LIABILITY FOR THE DISCLOSURE OF AN EMPLOYEE'S PERSONAL DATA

8.1. Violation of this Regulation entails the bringing upon of legal action in accordance with federal laws.

8.2. Any employee violating this Regulation may have financial and disciplinary action brought against them, including dismissal from the company.

8.3. Violation of the procedure for the collecting, storing, using and disseminating of personal data may bring about disciplinary action against the person committing such violations, as per Art. 13.11, 13.14 of Code of the Russian Federation on Administrative Offences No. 195-Φ3 dd. 30.12.2001.

8.4. Persons violating the privacy of one's private life, confidential personal or family information, or the revealing of a confidential adoption may have criminal charges brought against them, as per Art. 137, 155, 183 of Criminal Code of the Russian Federation No. 63-Φ3 dd. 13.06.1996.

9. APPENDICES

- Appendix No. 1 Standard form of an employee's written consent to have their personal data considered public
- Appendix No. 2 Standard form of an employee's written consent for personal data processing
- Appendix No. 3 Standard form of consent for the trans-border transfer of personal data