

PERSONAL DATA PROCESSING POLICY OF OJSC «RIVELTY GROUP»

Moscow

2018

1. General provisions

Personal Data Processing Policy (further — the "Policy" or "this Policy") is designed in accordance with the Federal Law of 27.07.2006 N°152-FL "On personal data" (further — FL-152).

This Policy defines the procedure for processing personal data and security measures of personal data in Open Joint Stock Company «Rivelly Group» (further — the Operator, the address of a website <https://rivelly.com>) in order to protect the rights and freedoms of a person and citizen when processing their personal data, including the protection of the rights to privacy, personal and family secrets.

The following basic concepts are used in the Policy:

- **automated processing of personal data** — processing of personal data using computer technology;
- **blocking of personal data** — temporary termination of the processing of personal data (except the cases when the processing is necessary to clarify personal data);
- **personal data information system** — the totality of personal data contained in databases, and information technologies and technical means that ensure their processing;
- **depersonalization of personal data** — actions that make it impossible to determine belonging of personal data to specific subject without using additional information;
- **processing of personal data** — any action (operation) or a set of actions (operations) performed with the use of automation tools or without the use of

such means, with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;

- **personal data** — any information related directly or indirectly to a specific or identifiable individual (the subject of personal data);
- **provision of personal data** — actions aimed at disclosure of personal data to a certain person or a certain circle of people;
- **distribution of personal data** — actions aimed at disclosure of personal data to an indefinite circle of people (transfer of personal data) or at familiarization for an unlimited number of people with personal data, including publishing personal data in the mass media, posting it in information and telecommunications networks, or providing access to personal data in any other way;
- **cross-border transfer of personal data** — transfer of personal data on the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity;
- **destruction of personal data** — actions that make it impossible to restore the content of personal data in the personal data information system and (or) as a result of which the material carriers of personal data are destroyed;
- **Cookies** — a small piece of data sent by a web server and stored on the computer of the personal data subject (user), which the web client or web browser sends each time to the web server in HTTP request when trying to open a site page;
- **IP address** — the unique network address of a node in a computer network built over the IP protocol.

2. Principles and conditions of personal data processing

2.1. Composition of personal data

The personal data allowed for processing under this Policy is provided by the personal data subject by filling out the registration form on the Operator's website and includes the following information about the personal data subject:

- last name, first name, patronymic;
- contact phone number;
- email address;
- other personal information that the subject provides about himself/herself in the process of using the Operator's website.

The Operator protects the data that is automatically transmitted during the viewing of personal data by the subject of advertising blocks, including information about Cookies. The Operator collects statistics about the IP addresses of its users. This information is used to identify technical problems.

The Operator does not verify the accuracy of the personal data provided by the subject, and does not have the ability to assess its legal capacity. However, the Operator assumes that the personal data subject provides reliable and sufficient data and keeps this information up to date.

2.2. Principles of personal data processing

The processing of personal data by the Operator is carried out on the basis of the following principles:

- legality and fair basis;
- restrictions on the processing of personal data for the achievement of specific, pre-defined and legitimate purposes;
- preventing the processing of personal data that is incompatible with the purposes of collecting personal data;
- preventing the integration of databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other;
- processing only those personal data that meet the purposes of their processing;

- compliance of the content and volume of the processed personal data with the stated purposes of processing;
- preventing the processing of personal data that is excessive in relation to the stated purposes of their processing;
- ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of personal data processing;
- destruction or depersonalization of personal data upon achievement of the purposes of their processing or in case of loss of the need to achieve these purposes, if it is impossible to eliminate the violations of personal data committed by the Operator, unless otherwise provided by Federal law.

2.3. Terms of personal data processing

The Operator processes personal data in the presence of at least one of the following conditions:

- the processing of personal data is carried out with the consent of the personal data subject to the processing of his personal data;
- the processing of personal data is necessary to achieve the goals stipulated by an international treaty of the Russian Federation or by law, to implement and accomplishment the obligations imposed by the Russian Federation legislation on the Operator of functions, powers and duties;
- the processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another authority or official subject to execution in accordance with the legislation of the Russian Federation enforcement proceedings;
- the processing of personal data is necessary for the performance of the contract, to which the subject of personal data is a part or beneficiary or guarantor, and to sign a contract on the initiative of the subject of personal data or a contract under which the subject of personal data will be a beneficiary or guarantor;

- the processing of personal data is necessary for the exercise of the rights and legitimate interests of the Operator or third parties, or for the achievement of socially significant goals, on condition that the rights and freedoms of the personal data subject are not violated;
- personal data is processed, access to which is granted to an unlimited number of people by the subject of personal data or at his request (further — publicly available personal data);
- personal data subject to publication or mandatory disclosure in accordance with Federal law is processed.

2.4. Confidentiality of personal data

The Operator and other persons who have obtained access to personal data are obliged not

to disclose or distribute personal data to third parties without consent of the personal data subject, unless otherwise provided by Federal law.

2.5. Assignment of personal data processing to another person

The Operator has the right to assign the processing of personal data to another person with the consent of the subject of personal data, unless otherwise provided by federal law, on the basis of a contract signed with this person. A person who processes personal data on behalf of the Operator is obliged to comply with the principles and rules of personal data processing provided for in FL-152.

2.6. Cross-border transfer of personal data

The Operator must ensure that a foreign state on the territory of which the personal data is supposed to be transferred, appropriate protection of the rights of subjects of personal data is provided until the beginning of the implementation of such a transfer.

Cross-border transfer of personal data on the territory of foreign states that do not provide appropriate protection of the rights of personal data subjects can be carried out in the following cases:

- the written consent of the personal data subject to the cross-border transfer of his personal data;
- execution of the contract to which the subject of personal data is a party.

3. Purposes of personal data processing

The Operator processes personal data for the following purposes:

- the Operator establishes feedback with the subject of personal data, including, but without limiting to the distribution of materials and content of the Site based on the subscription of the subject of personal data, the implementation of information and/or advertising mailing based on the consent of the subject of personal data;
- systematization of personal data (formation of a database);
- processing of personal data for other purposes agreed upon by the personal data subject.

4. Rights of the personal data subject

4.1. Consent of the personal data subject to the processing of his personal data

The subject of personal data makes a decision on the provision of his personal data and gives consent to its processing freely, at his own will and in his own interest. Consent to the processing of personal data can be given by the subject of personal data or his

representative in any form that allows to confirm the fact of its receipt, unless otherwise established by Federal law.

The Operator is obliged to provide proof of obtaining the consent of the personal data subject to the processing of his personal data or proof of the existence of the bases specified in FL-52.

4.2. Rights of the personal data subject

The subject of personal data has the right to receive from the Operator information concerning the processing of his personal data, if such right is not restricted in accordance with federal laws. The personal data subject has the right to require the Operator to clarify his personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as to take measures provided by law to protect his rights.

The processing of personal data for the purpose of promoting goods, works, and services on the market through direct contacts with a potential consumer via means of communication, as well as for the purpose of political agitation, is allowed only with the prior consent of the subject of personal data. The specified processing of personal data is considered to be carried out without the prior consent of the personal data subject, unless the Operator proves that such consent was obtained.

The operator is obliged to immediately stop at the request of the personal data subject the processing of his personal data for the above purposes.

It is prohibited to make decisions based solely on automated processing of personal data that give rise to legal consequences in relation to the subject of personal data or otherwise affect his rights and legitimate interests, except in cases provided by federal laws, or with the written consent of the subject of personal data.

If the personal data subject believes that the Operator processes his personal data in violation of the requirements of FL-152 or otherwise violates his rights and freedoms, the subject of personal data has the right to appeal against the actions or omissions of the Operator to the competent authority for the protection of the rights of personal data subjects or in court.

The subject of personal data has the right to protect his rights and legitimate interests, including compensation for damages and (or) compensation for moral damage in court.

5. Ensuring the security of personal data

The security of personal data processed by the Operator is ensured by the implementation of legal, organizational and technical measures necessary for ensuring the requirements of the federal legislation in the field of personal data protection.

To prevent unauthorized access to personal data the Operator applies the following organizational and technical measures:

- appointment of officials responsible for organizing the processing and protection of personal data;
- restriction of the number of people who have access to personal data;
- familiarization of subjects with the requirements of the federal legislation and regulatory documents of the Operator on the processing and protection of personal data;
- organization of accounting, storage and circulation of information carriers;
- identification of threats to the security of personal data during their processing, the formation of threat models based on them;
- development of a personal data protection system based on the threat model;
- checking the availability and effectiveness of the use of information security tools;
- differentiation of user access to information resources and software and hardware for information processing;
- registration and accounting of actions of users of personal data information systems;
- use of antivirus and personal data protection system recovery tools;
- use of means of internetwork shielding, intrusion detection, security analysis, and cryptographic protection of information, if necessary;
- organization of access control to the Operator's territory, protection of premises with technical means of processing personal data.

6. Final provisions

Other rights and obligations of the Operator as the Operator of personal data are determined by the legislation of the Russian Federation in the field of personal data.

Officials of the Operator who are guilty of violating the rules governing the processing and protection of personal data bear material, disciplinary, administrative, civil or criminal liability in accordance with the procedure established by federal laws.

The Operator has the right to make changes to this Privacy Policy without the consent of the personal data subject.

The new version of the Personal Data Processing Policy comes into force from the moment it is posted on the Operator's website, unless a later date is provided for the new version of the Personal Data Processing Policy.

The current version of the Policy is always available on the page at <https://rivelty.com>

APPROVED BY

General Director of OJSC «Rivelty Group»

_____ Bogdanov D. Yu.

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