

# Policy of Limited Liability Company Onlog System in relation to personal data processing

## 1. General provisions

1.1. This Policy of Limited Liability Company Onlog System in relation to personal data processing (hereinafter referred to as the Policy) was developed to ensure the protection of human and civil rights and freedoms in the processing of personal data, including the protection of the rights to privacy, personal and family secrecy.

1.2. The Policy applies to all personal data processed by Limited Liability Company Onlog System (hereinafter referred to as the Operator, LLC Onlog System).

1.3. The Policy applies to the relations in the field of personal data processing, which have arisen for the Operator both before and after the approval of this Policy.

1.4. The Policy is published in free access on the Internet on the Operator's website.

1.5. Key terms used in the Policy:

**personal data** – any information that relates to an individual (personal data subject);

**personal data controller (operator)** - state authority, municipal authority, legal or natural person, independently or jointly with other persons organizing and (or) carrying out processing of personal data, as well as determining the purposes of personal data processing, composition of personal data subject to processing, actions (operations) performed with personal data;

**processing of personal data** - any action (operation) or set of actions (operations) with personal data, performed with or without the use of automation tools. Processing of personal data includes, but is not limited to:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- clarification (update, change);
- extraction;
- utilization;
- transfer (distribution, provision, access);
- depersonalization;
- blocking;
- deletion;
- destruction;

**automated processing of personal data** - processing of personal data by means of computer equipment;

**dissemination of personal data** - actions aimed at disclosure of personal data to an indefinite number of persons;

**provision of personal data** - actions aimed at disclosure of personal data to a certain person or a certain circle of persons;

**blocking of personal data** - temporary cessation of personal data processing (except for cases when processing is necessary to clarify personal data);

**destruction of personal data** - actions, as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which material carriers of personal data are destroyed;

**depersonalization of personal data** - actions, as a result of which it becomes impossible to determine, without using additional information, the belonging of personal data to a particular personal data subject;

**personal data information system** - totality of personal data contained in databases and information technologies and technical means ensuring their processing;

**confidentiality of personal data** – obligation of persons who have access to personal data not to disclose them to third parties and not to disseminate personal data without the subject's consent;

**cross-border transfer of personal data** – transfer of personal data on the territory of a foreign state to a foreign legal entity.

1.6. Main rights and obligations of the Operator.

1.6.1. The operator has the right to:

1) independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of duties;

2) entrust the processing of personal data to another person. The person who processes personal data on behalf of the Operator is obliged to comply with the principles and rules of personal data processing, maintain confidentiality of personal data, take necessary measures aimed at ensuring the fulfilment of obligations;

3) in case the personal data subject withdraws consent to personal data processing, the Operator has the right to continue processing personal data without the consent of the personal data subject if there are grounds for this.

1.6.2. The operator is obliged to:

1) organize the processing of personal data in accordance with requirements;

2) respond to appeals and requests of personal data subjects and their legal representatives;

3) inform the authorized body for the protection of the rights of personal data subjects at the request of this body of the necessary information.

1.7. The basic rights of the subject of personal data.

1.7.1. The data subject has the right to receive detailed information regarding the processing of his/her personal data, including the following information, either in person or by sending a written request to the e-mail address (info@onlogsystem.com):

- confirmation of the fact of personal data processing;
- legal grounds and purposes of personal data processing;
- purposes and methods of personal data processing applied by LLC Onlog System;
- name of LLC Onlog System, its location and address, information about persons (except for full-time employees) who have access to personal data or to whom personal data may be disclosed;
- processed personal data related to the respective subject, the source of their obtaining;
- terms of processing, including terms of storage of personal data;
- information on realized or suspected trans-border transfer of personal data;
- name or surname, first name, patronymic and address of the person processing personal data on behalf of LLC Onlog System, if the processing is or will be entrusted to such a person.

1.7.2. Upon receipt of the subject's request for information regarding the processing of his/her personal data, LLC Onlog System undertakes to consider such request and send a response within thirty calendar days from the date of receipt of the request.

1.7.3. The subject has the right to demand elimination of violations committed during the processing of personal data, clarification of his/her personal data, their blocking or destruction if, in the subject's opinion, the data are incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing. The subject also has the right to withdraw his/her consent to the processing of personal data by sending a written request to the electronic address of Onlog System indicated above in this clause of the Policy.

1.8. Control over compliance with the requirements of this Policy shall be exercised by the authorized person responsible for the organization of personal data processing at the Operator.

## **2. Purposes of personal data collection**

2.1. The processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data incompatible with the purposes of personal data collection is not allowed.

2.2. Only personal data that fulfil the purposes for which they are processed are subject to processing.

2.3. Processing of personal data by the Operator is carried out for the following purposes:

- carrying out its activities in accordance with the charter of LLC Onlog System, including the conclusion and execution of contracts with counterparties;
  - execution of labor legislation within the framework of labor and other directly related relations, including: assisting employees in employment, education and promotion, attracting and selecting candidates for employment with the Operator, ensuring personal safety of employees, controlling the quantity and quality of work performed, ensuring the safety of property, maintaining personnel and accounting records, completing and submitting required reporting forms to authorized bodies, arranging for individual (personified) registration of employees with the Operator, ensuring the quality of work performed by the Operator, ensuring the safety of property, maintaining personnel and accounting records, completing and submitting required reporting forms to authorized bodies;
  - providing information on product updates, special offers, prices, newsletters and other information;
  - promotional activities;
  - security clearance.
- 2.4. Personal data of employees may be processed solely for the purpose of ensuring compliance with laws and other regulatory legal acts.

### **3. Legal basis of personal data processing**

- 3.1. The legal basis for personal data processing is a set of regulatory legal acts, in pursuance of which and in accordance with which the Operator processes personal data, including:
- Articles of Association of LLC Onlog System;
  - a contract to which the subject is or will be a party, a beneficiary or guarantor;
  - necessity of personal data processing for realization of rights and legitimate interests of the Operator or third parties;
  - the subject's consent to the processing of his/her personal data;
  - the need to process personal data in order to fulfil the obligations imposed on the Operator.
- 3.2. In order to implement the Policy of LLC Onlog System, appropriate necessary local normative acts may be developed.

### **4. Scope and categories of processed personal data, categories of personal data subjects**

- 4.1. The content and scope of the processed personal data shall comply with the stated purposes of processing as set out in Section 2 of this Policy. The processed personal data shall not be redundant in relation to the stated purposes of their processing.
- 4.2. The Operator may process personal data of the following categories of personal data subjects.
- 4.3. Category of personal data subject - candidate for a vacant position.
- 4.3.1. Scope and list of personal data that may be processed:
- surname, first name, patronymic;
  - date, month, year of birth;
  - address of residence;
  - marital status;
  - contact telephone numbers, e-mail addresses and/or other means of communication;
  - information on professional and labor activity, information on work experience (including previous jobs) and projects;
  - information on education, competences and specialization;
  - information on professional retraining and (or) professional development;
  - information on achievements, honors, state awards;
  - information on academic degrees and titles;
  - information on publications, scientific, educational, literary/publicist activities;

- information on military service;
- personal photograph;
- information on social benefits;
- information on foreign language proficiency, degree of proficiency;
- other information provided by the candidate for the vacant position.

4.3.2. The purpose of processing is to make a decision on the possibility of concluding a labor or partnership contract with the subject, to offer the Subject a position in the LLC OnlogSystem.

4.4. Category of the subject of personal data - natural person who applied to LLC Onlog System to receive services related to the activities of the company.

4.4.1. Scope and list of personal data that may be processed:

- surname, first name, patronymic;
- details of the identity document;
- taxpayer identification number (TIN);
- date of birth;
- address of registration;
- place of work and position held;
- contact information: mobile and office phone number, e-mail address;
- information provided by the client to ensure the possibility of providing services related to the activities of LLC Onlog System.

4.4.2. Purpose of processing:

- provision of services to the client related to the activities of LLC Onlog System;
- informational, advertising, marketing and other purposes aimed at realization and promotion of the Operator's activities by means of direct contacts with the client and potential client through means of communication.

4.5. Category of personal data subject - representative of a legal entity who has applied to the LLC Onlog System for services related to the activities of yje company.

4.5.1. Scope and list of personal data that may be processed:

- surname, first name, patronymic;
- details of the identity document (if necessary);
- date of birth (if necessary);
- address of registration (if necessary);
- place of work and position held;
- contact information: mobile and work phone number, e-mail address;
- information provided by the client in order to ensure the possibility of providing services related to the activities of LLC Onlog System.

4.6. Category of personal data subject - other individuals, including visitors to events organized by the LLC Onlog System, and persons receiving newsletters of LLC Onlog System.

4.6.1. Scope and list of personal data that may be processed:

- surname, first name, patronymic;
- postal address (if necessary)
- telephone number, fax number and e-mail address;
- information about the position and place of employment.

4.6.2. Purpose of processing:

- informational, advertising, marketing and other purposes aimed at implementation and promotion of the Operator's activities, including sending information mailings and marketing offers related to LLC Onlog System activities, invitations to seminars and other events, organization of meetings, attendance and participation in seminars and other events organized and conducted by LLC Onlog System.

## **5. Procedure and conditions of personal data processing**

5.1. Personal data processing is carried out by the Operator in accordance with the requirements of the legislation.

5.2. Personal data processing is carried out with the consent of personal data subjects to the processing of their personal data.

5.3. The Operator processes personal data for each purpose of its processing in the following ways:

- non-automated processing of personal data;
- automated processing of personal data with or without transmission of the received information via information and telecommunication networks;
- mixed processing of personal data.

5.4. The Operator's employees whose job description includes personal data processing are allowed to process personal data.

5.5. It is not allowed to disclose to third parties and disseminate personal data without the consent of the subject of personal data, unless otherwise provided for by law. Consent to the processing of personal data authorized by the subject of personal data for dissemination shall be executed separately from other consents of the subject of personal data to the processing of his/her personal data.

5.6. The Operator shall take the necessary legal, organizational and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, dissemination and other unauthorized actions, including:

- determination of threats to the security of personal data during their processing;
- adoption of local regulatory acts and other documents regulating relations in the field of personal data processing and protection;
- appointing persons responsible for ensuring personal data security in the structural subdivisions and information systems of the Operator;
- creation of necessary conditions for working with personal data;
- organization of accounting of documents containing personal data;
- organization of work with information systems in which personal data is processed;
- storage of personal data in conditions that ensure their safety and prevent unauthorized access to them;
- organization of training of the Operator's employees who process personal data.

5.7. The Operator shall store personal data in a form that allows identification of the personal data subject for no longer than required by each purpose of personal data processing, unless the period of personal data storage is specified in the contract.

5.7.1. The period of storage of personal data processed in personal data information systems corresponds to the period of storage of personal data on paper carriers.

5.8. The Operator stops processing personal data in the following cases:

- the fact of their unauthorized processing has been revealed. The deadline is within three working days from the date of detection;
- the purpose of their processing has been achieved;
- the personal data subject's consent to the processing of the said data has expired or been withdrawn.

5.9. When the purposes of personal data processing are achieved, as well as in case the subject of personal data withdraws his/her consent to their processing, the Operator stops processing such data if:

- otherwise is not stipulated by the contract to which the personal data subject is a party, beneficiary or guarantor;
- the Operator is not entitled to carry out processing without the consent of the personal data subject on the grounds stipulated by law;
- unless otherwise provided for by another agreement between the Operator and the subject of personal data.

5.10. If a personal data subject appeals to the Operator with a request to stop processing personal data within a period not exceeding 10 working days from the date of receipt of the relevant request by the Operator, the processing of personal data shall be stopped, except for cases stipulated by law. The said term

may be extended, but not more than for five working days. For this purpose, the Operator shall send a motivated notice to the personal data subject indicating the reasons for extending the term.

5.11. When collecting personal data, including through the Internet, the Operator ensures recording, systematization, accumulation, storage, clarification (update, change), extraction of personal data using databases.

5.12. LLC Onlog System may perform cross-border transfer of personal data in order to carry out personal data processing using a third-party service located abroad.

## **6. Updating, correction, deletion, destruction of personal data, responses to requests of subjects for access to personal data**

Confirmation of the fact of personal data processing by the Operator, legal grounds and purposes of personal data processing, as well as other information shall be provided by the Operator to the personal data subject or his/her representative within 10 working days from the moment of application or receipt of the request of the personal data subject or his/her representative. This term may be extended, but not more than for five working days. For this purpose, the Operator should send a motivated notification to the personal data subject indicating the reasons for extending the term for providing the requested information.

The information provided shall not include personal data related to other personal data subjects, except for cases when there are legitimate grounds for disclosure of such personal data.

The request must contain:

- number of the main identity document of the personal data subject or his/her representative, information about the date of issue of the said document and the issuing authority;
- information confirming the personal data subject's participation in relations with the Operator (contract number, date of contract conclusion, conventional word designation and (or) other information), or information otherwise confirming the fact of personal data processing by the Operator;
- signature of the personal data subject or his/her representative.

The request may be sent in the form of an electronic document and signed with an electronic signature.

The operator provides information to the subject of personal data or his/her representative in the form in which the relevant appeal or request was sent, unless otherwise specified in the appeal or request.

The right of the subject of personal data to access his/her personal data may be restricted, including if the subject's access to his/her personal data violates the rights and legitimate interests of third parties.

6.1. In case of detection of inaccurate personal data upon application of the personal data subject or his/her representative or upon their request, the Operator blocks personal data related to this personal data subject from the moment of such application or receipt of the said request for the period of verification, if the blocking of personal data does not violate the rights and legitimate interests of the personal data subject or third parties.

If the fact of inaccuracy of personal data is confirmed, the Operator, based on the information submitted by the personal data subject or his/her representative or other necessary documents, clarifies the personal data within seven working days from the date of submission of such information and removes the blocking of personal data.

6.2. In case of detection of unlawful processing of personal data upon application (request) of a personal data subject or his/her representative, the Operator shall block the unlawfully processed personal data related to this personal data subject from the moment of such application or receipt of a request.

6.3. Procedure for destruction of personal data by the Operator.

6.3.1. Conditions and terms of personal data destruction by the Operator:

- achievement of the purpose of personal data processing or loss of necessity to achieve this purpose - within 30 days;
- achieving the maximum retention period of documents containing personal data - within 30 days;
- provision by the personal data subject (his/her representative) of confirmation that the personal data were obtained unlawfully or are not necessary for the declared purpose of processing - within seven working days;

- revocation by the personal data subject of consent to the processing of his/her personal data, if their preservation for the purpose of their processing is no longer required - within 30 days.

6.3.2. When the purpose of personal data processing is achieved, as well as in case the subject of personal data withdraws consent to their processing, the personal data shall be destroyed if:

- otherwise is not stipulated by the contract to which the personal data subject is a party, beneficiary or guarantor;
- the Operator may not carry out processing without the consent of the subject of personal data;
- unless otherwise provided for by another agreement between the Operator and the subject of personal data.

6.3.3. Methods of personal data destruction are set out in the Operator's local regulations.