



CEO of "Legal and financial creative solutions" Ltd.



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**SEAL: INN 7705975190 \* LIMITED COMPANY OGRN 1127746024493 \* MOSCOW \* LEGAL AND FINANCIAL CREATIVE SOLUTIONS / LEGAL AND FINANCIAL CREATIVE SOLUTIONS**

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## **PERSONAL DATA PROCESSING POLICY**

### **1. GENERAL PROVISIONS**

1.1. This personal data processing Policy (hereinafter - the Policy) is adopted by LFCS Ltd. in order to ensure the implementation of the requirements of the current legislation of the Russian Federation.

#### Terms and definitions

1.2. Operator - limited Company LFCS, legal address: 115054 Moscow, Dubininskaya, 57, block 1 room I, office 76, INN: 770597519, OGRN: 1127746024493, registered in accordance with the current legislation of the Russian Federation and engaged in the processing of personal data of personal data subjects.

Personal data subject - a natural person identified by means of personal data.

Personal data - any information that relates directly or indirectly to a particular/identifiable person.

Personal data processing - actions performed by the Operator with or without the use of automation tools 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.

Automated processing of personal data - processing of personal data by means of computer equipment (computers).

Personal data information system - the Operator's database, which contains personal data, as well as information technologies and technical means that allow the processing of personal data with or without automation.

Personal data protection - a set of organizational and technical actions on the part of the Operator aimed at protecting personal data.

Blocking of personal data - temporary termination of processing of personal data (except in cases where the processing is necessary to improve personal data).

Depersonalization of personal data - actions, as a result of which it becomes impossible without the use of additional information to determine the belonging of personal data to a particular subject of personal data.

Provision of personal data - actions aimed at disclosure of personal data to a certain person or a certain circle of persons.

Distribution of personal data - actions aimed at disclosure of personal data to an indefinite number of persons.

Confidentiality of personal data - requirement mandatory for the Operator or other person who has access to personal data not to allow the disclosure of personal data to third parties, their distribution without the consent of the subject of personal data or the presence of other legal grounds.

Storage of personal data - the direct content of personal data in the information system of the Operator's personal data.

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

## 2. BASIC PRINCIPLES AND PURPOSES OF PERSONAL DATA PROCESSING

### 2.1. Principles of personal data processing

processing of personal data is carried out on a legal and fair basis; it is not allowed to process personal data contrary to the purposes of collection (receipt) of personal data;

the processing of personal data is limited to the achievement of certain legal purposes;

processing of personal data is allowed only with the consent of the personal data subject;

only those personal data that meet the purposes of their processing specified in clause 2.2 of the present section are processed;

processing of personal data that does not correspond to the purposes of such processing is not allowed;

personal data will be stored in the form enabling to identify the data subject within the term that corresponds to the personal data processing purposes, if such period is not set by Federal law or contract, which a party, beneficiary or guarantor which is the subject of personal data.

### 2.2. Purposes of personal data processing

execution of the provisions of the current legislation of the Russian Federation;

proper maintenance of personnel records of the Operator's employees, payroll, medical insurance and payment for services of persons under civil contracts;

provision of services and execution of contracts and agreements concluded by the Operator with individuals;

any other purposes for which the Operator requires the processing of personal data in accordance with the current legislation of the Russian Federation.

### 3. SUBJECTS OF PERSONAL DATA

3.1. The subjects of personal data include the following persons:

3.1.1. in the field of labor relations:

employees of the Operator working on the basis of employment contracts;

applicants for vacant positions of the Operator.

3.1.2. in the field of civil relations:

any capable individuals with whom the Operator enters into civil contracts;

any capable individuals who are about to enter into or have already entered into contracts with the Operator and act as a party, beneficiary or guarantor under such contracts.

3.1.3. in other (related) areas:

visitors to the Operator's office;

representatives (employees) of the Operator's counterparties;

other persons whose personal data processing may be required by the Operator in accordance with the requirements (on the basis of) the current legislation of the Russian Federation.

### 4. RIGHTS OF PERSONAL DATA SUBJECTS

4.1. The subject of personal data has the right to receive information relating to the processing of his personal data, in accordance with the current legislation.

4.2. In order to exercise their rights and legitimate interests, the subject of personal data has the right to apply to the Operator for the provision of information relating to the processing and protection of personal data. The Operator considers the requests of personal data subjects, gives explanations and takes measures to protect personal data. In case of claims and complaints from the personal data subjects, the Operator takes all necessary measures to eliminate possible violations, identify the perpetrators and settle disputes in the pre-trial order.

4.3. The right of the personal data subject to access to his personal data may be limited in the following cases, established by the current legislation of the Russian Federation.

4.4. Other rights defined by the Federal law "on personal data".

### 5. CATEGORIES OF PERSONAL DATA TO BE PROCESSED AND SOURCES OF THEIR RECEIPT

5.1. In the information system of personal data, the Operator processes the following categories of personal data:

5.1.1. In accordance with paragraph 3.1.1. section 3 of the Policy: for Operator employees

surname, name, patronymic;

passport data;

date and place of birth; registration address; marital status; education; profession; INN data; Bank details;

data of pension insurance certificate; data of medical policies;

data on the birth of children and on the marriage or divorce; data on the military register; place of work; position;

information about employment (Employment record); telephone

for relatives of employees of the Operator surname, name, patronymic;

date of birth; degree of relationship.

5.1.2. In accordance with paragraph 3.1.2. section 3 of the Policy:

For individuals with whom the Operator enters into civil contracts

surname, name, patronymic; passport data; date and place of birth;

registration address, address of the premises where the services are provided; INN data;

data of pension insurance certificate; Bank details; e-mail address (e-mail) contact phone number;

other information that may relate to these individuals.

5.1.3. In accordance with paragraph 3.1.3. section 3 of the Policy:

surname, name, patronymic; passport data; telephone.

other information that may relate to these individuals.

5.1.4. The sources of personal data are:

For labor relations and personnel records of the Operator's employees, as well as for persons with whom the Operator enters into contracts of a civil nature and other persons whose personal data processing may be required by the Operator.

documents and information provided personally by employees and individuals with whom contracts of a civil nature are concluded.

For individuals who are going to conclude or have already concluded contracts with the Operator and act as a party, beneficiary or guarantor under such contracts.

Information provided personally by such citizens when registering and creating accounts when using the software and websites of the Operator and filling out the relevant electronic forms. Mandatory

information is marked in a special way. Any other information is provided by individuals at their discretion.

## 6. CONFIDENTIALITY OF PERSONAL DATA

6.1. All information relating to personal data, which became known to the Operator in connection with the implementation of the processing of such data - are confidential information and are protected by the current legislation of the Russian Federation. The operator shall take appropriate measures to protect such information.

6.2. The Operator's employees and other persons who have gained access to the processed personal data must sign a non-disclosure agreement and are warned of possible disciplinary, administrative, civil and criminal liability in case of violation of the provisions of the current legislation of the Russian Federation in the field of processing and protection of personal data.

## 7. MEASURES TO ENSURE THE SECURITY OF PERSONAL DATA DURING THEIR PROCESSING

7.1. When processing personal data, the Operator shall take all necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data.

7.2. The main measures aimed at the protection of personal data carried out by the Operator:

appointment of the Operator's employees responsible for personal data processing; internal control (audit) of compliance of personal data processing with the requirements of the Federal law of 27.07.2006 No. 152-FZ "On personal data" and other legal acts regulating this area;

familiarization of the Operator's employees directly engaged in the processing of personal data with the provisions of the current legislation of the Russian Federation on personal data, including the requirements for the processing and protection of personal data, local regulations, including this Policy.

application of organizational and technical measures aimed at ensuring the security of personal data during their processing in information systems of personal data necessary to comply with the requirements for the processing and protection of personal data

accounting for physical carriers of personal data (computers);

establishment of facts of unauthorized access to personal data and taking appropriate measures;

recovery of personal data modified or destroyed as a result of unauthorized access to them;

establishment of rules for access to personal data processed in the information system of personal data, as well as ensuring registration and accounting of all actions performed with personal data in the information system of personal data;

control over the measures taken to ensure the security of personal data.

## 8. FINAL PROVISION

8.1. The Operator has the right to make changes to this Policy. The new version of the Policy shall enter into force upon its signing by the authorized person of the Operator and the official publication of the electronic version on the website at the following address on the Internet [www.legalsupport.ru](http://www.legalsupport.ru)

8.2. Control over compliance with the requirements of the Policy is carried out by persons responsible for ensuring the security of personal data.