

## PERSONAL DATA POLICY of AO EXPOCENTRE

### 1 GENERAL

The policy of AO EXPOCENTRE as a Personal Data Operator ("Policy") was developed under Federal Law No. 152-FZ On Personal Data dated July 27, 2006 ("Federal Law").

This Policy sets forth the personal data processing procedure and measures to be taken by AO EXPOCENTRE ("Company") to ensure security of personal data in order to protect the rights and freedoms of each person and citizen when processing his/her personal data, including protection of the right to privacy and to personal and family secrets.

The Company provides unrestricted access to this Policy.

The following basic concepts are used in this Policy:

**Automatic personal data processing** means processing of personal data using computer aids.

**Blocking of personal data** means temporary termination of personal data processing (except where it is necessary to rectify personal data).

**Personal data information system** means the aggregate of personal data contained in databases and of information technologies and hardware that ensure the data processing.

**Depersonalization of personal data** means actions that make it impossible to determine without using additional information whether certain personal data belongs to a specific person.

**Personal data processing** means any action/operation or a set of actions/operations with personal data performed with or without computer equipment including collection, recording, systematization, accumulation, storage, rectification (updating or change), retrieval, use, transmission (dissemination, provision, or access), depersonalization, blocking, removal, and destruction of personal data.

**Personal data** means any information related directly or indirectly to a certain or defined individual (the subject of personal data).

**Provision of personal data** means actions intended to disclose personal data to a certain individual or a certain group of individuals.

**Dissemination of personal data** means actions intended to disclose personal data to an indefinite group of individuals (personal data disclosure) or to make personal data known to an unlimited number of people including publication of personal data in the mass media, placement in information-telecommunications networks or provision of access to personal data in any other manner.

**Transborder transfer of personal data** means transfer of personal data to the territory of a foreign state, to an authority of a foreign state, and to a foreign individual or a foreign legal entity.

**Destruction of personal data** means actions that make it impossible to recover the content of personal data from a personal data information system and/or that destroy personal data media.

### 2 PERSONAL DATA PROCESSING PRINCIPLES AND CONDITIONS

#### 2.1 Personal Data Processing Principles

Personal data processing by the Company is based on the following principles:

- Legality and fair basis.

- Restriction of personal data processing to achievement of specific and legal objectives set in advance.
- Avoidance of personal data processing incompatible with the purpose of personal data collection.
- Avoidance of combining databases containing personal data to be processed for purposes incompatible with each other.
- Processing of only those personal data that meet the objective of their processing.
- Compliance of the content and amount of processed personal data to the stated objective of the processing.
- Avoidance of processing personal data in excess of the stated objective of their processing.
- Ensuring accuracy, sufficiency and relevance of personal data with regard to the objective of personal data processing.
- Destruction or depersonalization of personal data upon achieving the objective of processing or if there is no longer the need to achieve this objective and it is impossible for the Company to remedy violations of personal data unless otherwise stipulated by federal law.

## **2.2 Personal Data Processing Conditions**

The Company processes personal data if at least one of the following conditions is present:

- Personal data are processed with the consent of the subject of personal data or of a legal representative thereof to his/her personal data processing.
- Personal data processing is necessary for the goal specified by an international treaty of the Russian Federation or by law or for the implementation and performance of the functions, powers, or duties imposed by the laws of the Russian Federation on the Company.
- Personal data processing is necessary to carry out an agreement, to which the subject of personal data is either a party or a beneficiary or the guarantor, or to conclude an agreement at the initiative of the subject of personal data or an agreement to which the subject of personal data will be the beneficiary or the guarantor.
- The personal data are processed, access to which was provided for an unlimited group of people by the subject of personal data or at his/her request (publicly available personal data).
- Personal data are processed, which are to be published or must be disclosed under federal law.

## **2.3 Confidentiality of Personal Data**

The Company and other persons who got access to personal data must not disclose them to third parties or disseminate the personal data without the consent of the subject of personal data unless otherwise stipulated by federal laws.

## **2.4 Public Sources of Personal Data**

To provide required information, the Company creates publicly accessible sources of personal data including directories, address books, and databases of exhibition visitors. With the written consent of the subject of personal data, the public sources thereof may include the subject's full name, date of birth, title, contact telephone numbers, e-mail address, and other personal data that the subject may share.

Information about the subject shall be removed from public sources of personal data at the request of the subject or by decision of court or of another authorized state agency.

## **2.5 Special Categories of Personal Data**

The Company may process a special category of personal data that contain information about health for positions/categories of persons subject to a mandatory medical check-up prior to employment for harmful and/or hazardous working conditions and for transportation jobs, if:

- the subject of personal data agreed in writing for these personal data to be processed;
- the personal data are to be processed under laws on state social assistance, employment, the laws of the Russian Federation on pensions to be paid by the state and on retirement pensions;

- the personal data are to be processed under mandatory insurance and other insurance laws.

The processing of the special category of personal data shall be stopped immediately if the reasons for the processing disappear unless otherwise provided for by the Federal Law.

## **2.6 Biometric Personal Data**

The details that characterize human physiological and biological features on the basis of which a person can be identified (biometric personal data) and which are used by the Company to identify the subject of personal data can be processed only if the subject agrees thereto in writing.

## **2.7 Assignment of Personal Data Processing to a Third Party**

The Company may entrust personal data processing to a third party with the consent of the subject of personal data under a contract entered into with this party unless otherwise stipulated by the Federal Law. When assigning the personal data processing to the third party, the Company shall comply with the personal data processing principles and rules specified by the Federal Law.

## **2.8 Transborder Transfer of Personal Data**

The Company shall transfer personal data across borders to the territories of the foreign states that are parties to the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data and to other foreign states that can provide adequate protection of the rights of the subjects of personal data under contracts signed with organizers of exhibition and congress events (Order No. 139 dated 25.09.2017 as revised).

# **3 THE RIGHTS OF THE SUBJECT OF PERSONAL DATA**

## **3.1 The Consent of the Subject of Personal Data to Processing his/her Personal Data**

The subject of personal data decides to provide his/her personal data and consents to the data being processed freely with his/her own free will and in his/her interest. The subject of personal data or a representative thereof can agree to personal data processing in any form making it possible to prove the fact of the consent unless otherwise stipulated by the Federal Law.

The responsibility to provide proof of the consent by the subject of personal data to processing his/her personal data or evidence of the grounds specified by the Federal Law lies with the Company.

## **3.2 The Rights of the Subject of Personal Data**

The subject of personal data has the right to receive information from the Company concerning the processing of his/her personal data if this right is not restricted by federal laws. The subject of personal data may demand that the Company update, block or destroy the personal data thereof if these personal data are incomplete, obsolete, inaccurate, acquired illegally or are not necessary for the declared objective of data processing and may take measures specified by law to protect his/her rights.

Personal data processing to promote goods, work, or services on the market by direct contacts with potential customers by means of communications is only allowed provided the subject of personal data agreed thereto in advance. This personal data processing shall be regarded as carried out without the prior consent of the subject of personal data unless the Company fails to prove that this consent was obtained.

The Company shall stop immediately the processing of personal data for the above purposes if the subject of personal data so requests.

Decisions must never be made solely on the basis of automatic personal data processing if that gives rise to legal consequences for the subject of personal data or otherwise infringes upon his/her rights

and legitimate interests except for the cases specified by federal laws or if the written consent of the subject of personal data is given.

If the subject of personal data believes that the Company processes his/her personal data in contravention of the Federal Law or otherwise infringes upon his/her rights and freedoms, the subject of personal data may appeal against the Company's actions or omission to act to the Authority for the Protection of the Rights of Personal Data Subjects or start legal proceedings.

The subject of personal data is entitled to the protection of his/her rights and legitimate interests, including damages and/or compensation for moral injury, by court of law.

#### **4 ENSURING PERSONAL DATA SECURITY**

The security of personal data to be processed by the Company is ensured by legal, organizational and technical measures required for complying with federal personal data protection laws.

The following organizational and technical measures are taken by the Company in order to prevent unauthorized access to personal data:

- Appointment of officials responsible for managing personal data processing and protection.
- Restriction of the range of persons with access to personal data.
- Briefing the employees on the requirements of federal laws and of the Company's regulatory documents concerning personal data processing and protection.
- Proper management of record-keeping, storage, and data media handling.
- Identification of security threats to personal data in the course of processing and threat modeling on its basis.
- Development, implementation and modification of a personal data protection system.
- Differentiation of user access to informational resources and to software and hardware for information processing and protection.
- Use of information protection tools necessary to ensure security of personal data including cryptographic means.
- Ensuring recovery of personal data destroyed or modified due to unauthorized access thereto.
- Supervision of measures being taken to ensure personal data security and the level of protection of personal data IT systems.
- Setting up check points for entry to the Company's area and guarding the premises that contain personal data processing hardware.

#### **5 FINAL PROVISIONS**

Other rights and responsibilities of the Company as the Personal Data Operator are governed by laws of the Russian Federation in the area of personal data processing.

The Company's officials found guilty of violating the standards for regulating the processing and protection of personal data shall bear pecuniary, disciplinary, administrative, legal or criminal liability in accordance with the procedures prescribed by federal laws.

