

APPROVED BY

Director of Boxglass

T. A. Kalashnikova
March 24, 2018

PERSONAL DATA PROCESSING
POLICY
IN BOXGLASS

1. General provisions

- 1.1. Personal Data Processing Policy (hereinafter referred to as the Policy) is aimed at protecting the rights and freedoms of individuals whose personal data are processed by Boxglass (hereinafter referred to as the Operator).
- 1.2. The Policy was developed in accordance with cl. 2, part 1, art. 18.1 of Federal Law No. 152-FZ On Personal Data as of July 27, 2006 (hereinafter referred to as the Federal Law On Personal Data).
- 1.3. The Policy contains information to be disclosed in accordance with part 1 of art. 14 of the Federal Law On Personal Data and is a public document.

2. Operator details

- 2.1. The Operator operates at the address: Office 312, 145A Udmurtskaya Street, Izhevsk, Udmurt Republic, 426077, Russia.
- 2.2. The Creative Director Kirill Vitalyevich Nikitin is responsible for the organization of personal data processing.
- 2.3. The database of information containing personal data of citizens of the Russian Federation is located at the address: Office 312, 145A Udmurtskaya Street, Izhevsk, Udmurt Republic, 426077, Russia.

3. Information about personal data processing

- 3.1. The Operator processes personal data on a legal and fair basis to carry out the functions, powers and duties imposed by the legislation, and to exercise the rights and legal interests of the Operator, employees of the Operator and third parties.
- 3.2. The Operator receives personal data directly from the subjects of personal data.
- 3.3. The Operator processes personal data using automated and non-automated methods with or without computer equipment.
- 3.4. Personal data processing includes collection, recording, systematization, accumulation, storage, review (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction.
- 3.5. Databases of information containing personal data of citizens of the Russian Federation are located on the territory of the Russian Federation.

4. Processing of personal data of individuals: individuals interested in obtaining different kinds of information about the Operator's goods/services, news, and sales promotion from the Operator (Potential customers)

- 4.1. The Operator processes personal data of individuals who are "individuals interested in obtaining different kinds of information about the Operator's goods/services, news, and sales promotion from the Operator (Potential customers)" under legal relationships with the Operator regulated by Part 2 of the Civil Code of the Russian Federation No. 14-FZ as of January 26, 1996.
- 4.2. The Operator processes personal data of "individuals interested in obtaining different kinds of information about the Operator's goods/services, news, and sales promotion from the Operator (Potential customers)" in order to:
 - Inform and send materials about sales promotions carried out by the Operator
 - Informing and send training materials
 - Advise on goods/services and special offers of the Operator, as well as advise on other issues related to the Operator's activities.
- 4.3. The Operator processes personal data of "individuals interested in obtaining different kinds of information about the Operator's goods/services, news, and sales promotion from the Operator (Potential customers)" with their written or implied consent.
- 4.4. The Operator processes personal data of "individuals interested in obtaining different kinds of information about the Operator's goods/services, news, and sales promotion from the Operator (Potential customers)" no longer than it is required for the purposes of personal data processing, unless otherwise required by legislation of the Russian Federation.
- 4.5. The Operator processes the following personal data of "individuals interested in obtaining different kinds of information about the Operator's goods/services, news, and sales promotion from the Operator (Potential customers)":
 - Full name
 - Contact phone number
 - E-mail address

5. Processing of personal data of individuals: individuals acting on behalf of individuals and/or individual entrepreneurs and/or legal entities (Representatives)

- 5.1. The Operator processes personal data of "individuals acting on behalf of individuals and/or individual entrepreneurs and/or legal entities (Representatives)" under legal relationships with the Operator regulated by Part 2 of the Civil Code of the Russian Federation No. 14-FZ as of January 26, 1996.

5.2. The Operator processes personal data of "individuals acting on behalf of individuals and/or individual entrepreneurs and/or legal entities (Representatives)" in order to:

- Provide information about goods/services of the Operator
- Draw up/conclude civil law contracts
- Fulfill contractual obligations.

5.3. The Operator processes personal data of "individuals acting on behalf of individuals and/or individual entrepreneurs and/or legal entities (Representatives)" with their written or implied consent.

5.4. The Operator processes personal data of "individuals acting on behalf of individuals and/or individual entrepreneurs and/or legal entities (Representatives)" no longer than it is required for the purposes of personal data processing, unless otherwise required by legislation of the Russian Federation.

5.5. The Operator processes the following personal data of "individuals acting on behalf of individuals and/or individual entrepreneurs and/or legal entities (Representatives)":

- Full name
- Type, series and number of the identity document
- Date of issue of the identity document and information on the issuing authority
- Address
- Contact phone number
- E-mail address

6. Processing of personal data of individuals: individuals having contractual relationships with the Operator (Counterparties, Partners, Contractors/Executors)

6.1. The Operator processes personal data of "individuals having contractual relationships with the Operator (Counterparties, Partners, Contractors/Executors)" under legal relationships with the Operator regulated by Part 2 of the Civil Code of the Russian Federation No. 14-FZ as of January 26, 1996.

6.2. The Operator processes personal data of "individuals having contractual relationships with the Operator (Counterparties, Partners, Contractors/Executors)" in order to:

- Draw up and conclude civil law contracts
- Execute, terminate, or cancell civil law contracts
- Carry out activities to develop computer software, as well as other activities set out in constituent documents of the Operator
- Inform about the Operator's goods/services, special promotions and offers
- Issue discount cards.

6.3. The Operator processes personal data of "individuals having contractual relationships with the Operator (Counterparties, Partners, Contractors/Executors)" with their written or implied consent.

6.4. The Operator processes personal data of "individuals having contractual relationships with the Operator (Counterparties, Partners, Contractors/Executors)" no longer than it is required for the purposes of personal data processing, unless otherwise required by legislation of the Russian Federation.

6.5. The Operator processes the following personal data of "individuals having contractual relationships with the Operator (Counterparties, Partners, Contractors/Executors)":

- Full name
- Type, series and number of the identity document
- Date of issue of the identity document and information on the issuing authority
- Address
- Income
- Position
- Contact phone number
- E-mail address

7. Processing of personal data of individuals: individuals being candidates for a vacancy (Applicants)

7.1. The Operator processes personal data of "individuals being candidates for a vacancy (Applicants)" under legal relationships with the Operator regulated by Part 2 of the Civil Code of the Russian Federation No. 14-FZ as of January 26, 1996.

7.2. The Operator processes personal data of "individuals being candidates for a vacancy (Applicants)" in order to:

- Organize and hold competitions for a vacancy
- Inform and send materials on vacancies
- Assist in finding employment
- Organize on-the-job training and/or internship and/or training
- Draw up and conclude an employment contract
- Manage candidate pool.

7.3. The Operator processes personal data of "individuals being candidates for a vacancy (Applicants)" with their written or implied consent.

7.4. The Operator processes personal data of "individuals being candidates for a vacancy (Applicants)" no longer than it is required for the purposes of personal data processing, unless otherwise required by legislation of the Russian Federation.

7.5. The Operator processes the following personal data of "individuals being candidates for a vacancy (Applicants)":

- Full name
- Type, series and number of the identity document
- Date of issue of the identity document and information on the issuing authority
- Year of birth
- Month of birth
- Date of birth
- Contact phone number
- E-mail
- Marital status
- Education
- Occupation
- Work experience
- Address.

8. Processing of personal data of individuals: individuals having employment relationships with the Operator (Employees)

8.1. The Operator processes personal data of "individuals having employment relationships with the Operator (Employees)" under legal relationships with the Operator regulated by Part 2 of the Civil Code of the Russian Federation No. 14-FZ as of January 26, 1996.

8.2. The Operator processes personal data of "individuals having employment relationships with the Operator (Employees)" in order to:

- Execute, terminate, or cancel employment contracts
- Arrange/keep HR records
- Arrange/keep accounting records
- Manage HR records, including completion of essential documents in accordance with legislation of the Russian Federation
- Observe the rules of occupational safety, personal safety and safeguard of assets
- Control the amount and quality of work performed
- Pay salaries, bonuses and benefits according to legislation of the Russian Federation
- Assist in training and promotion
- Fulfill legal requirements of the Russian Federation related to calculation and payment of personal income tax, as well as payment of pension, social and other contributions provided for by the legislation of the Russian Federation.

8.3. The Operator processes personal data of "individuals having employment relationships with the Operator (Employees)" with their written or implied consent.

8.4. The Operator processes personal data of "individuals having employment relationships with the Operator (Employees)" no longer than it is required for the purposes of personal data processing, unless otherwise required by legislation of the Russian Federation.

8.5. The Operator processes the following personal data of "individuals having employment relationships with the Operator (Employees)":

- Full name
- Type, series and number of the identity document
- Date of issue of the identity document and information on the issuing authority
- Address
- Income
- Position
- Contact phone number

— E-mail address

8.6. To achieve the objectives of personal data processing and with the consent of "individuals having employment relationships with the Operator (Employees)", the Operator provides personal data or delegates their processing to the following bodies:

- Social Insurance Fund of the Russian Federation
- Pension Fund of the Russian Federation
- Federal Tax Service of the Russian Federation.

9. Information about personal data security

9.1. The Operator appoints a person responsible for personal data processing management to fulfill the obligations under the Federal Law On Personal Data and laws and regulations adopted under it.

9.2. The Operator takes legal, organizational and technical measures to ensure the security and confidentiality of personal data and protect them from illegal actions:

- provides unrestricted access to the Policy, a copy of which is available at the address of the Operator and can also be published on the Operator's website (if any);
- pursuant to the Policy, the Operator approves and implements the document "Regulations on the processing of personal data" (hereinafter referred to as the Regulations) and other internal regulations;
- introduces its employees to personal data legislation, as well as to the Policy and the Regulations;
- makes sure that the employees have access to personal data processed in the Operator's information system, as well as to their tangible media only to fulfill their job duties;
- establishes rules for accessing personal data processed in the Operator's information system and ensures the due record and account of all actions with them;
- assesses the harm that may be caused to subjects of personal data in case of violation of the Federal Law On Personal Data;
- identifies threats to the security of personal data when processing them in the Operator's information system;
- takes organizational and technical measures and uses means of information protection to achieve the required level of personal data protection;
- detects unauthorized access to personal data and takes response measures, including restoration of personal data modified or destroyed due to unauthorized access to them;
- assesses the effectiveness of measures taken to ensure the security of personal data before putting the information system of the Operator into operation;
- exercises internal control of compliance of the personal data processing with the Federal Law On Personal Data, laws and regulations adopted under it, requirements for the protection of personal data, the Policy, the Regulations and other internal regulations, including control over the measures taken to ensure the security of personal data and the level of their protection during processing in the information system of the Operator.

10. Rights of subjects of personal data

10.1. A subject of personal data has a right to:

- Receive personal data related to this subject and information on their processing
- Clarify, block or destroy their personal data in case they are incomplete, outdated, incorrect, illegally obtained or not relevant for the stated purpose of processing
- Withdraw their consent to personal data processing
- Protect their rights and legitimate interests, including the right to take legal proceedings to receive compensation of losses and/or moral injury
- File a claim against actions or omissions of the Operator to the authorized authority for the protection of the rights of subjects of personal data or to court.

10.2. To exercise their rights and legitimate interests, subjects of personal data have a right to contact the Operator or make a request personally or through a representative. The request must contain the information specified in part 3 of art. 14 of the Federal Law On Personal Data.