

Approved by
the CEO of ASIAEXPO LLC

_____ I.Yu. Milovanov

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Policy of ASIAEXPO LLC on personal data processing

1. General provisions

1.1. This Policy of ASIAEXPO LLC regarding personal data processing (hereinafter referred to as the Policy) was developed in accordance with the requirements of clause 2, part 1, art. 18.1 of the Federal Law of July 27, 2006 No. 152-FZ “On Personal Data” (hereinafter referred to as the Law on Personal Data) in order to ensure the protection of the rights and freedoms of a human and a national when processing his/her personal data, including the protection of rights to privacy, personal and family secrets.

1.2. The policy applies to all personal data processed by ASIAEXPO LLC (hereinafter referred to as the Operator).

1.3. The Policy applies to relations in the field of personal data processing that arose with the Operator both before and after the approval of this Policy.

1.4. In pursuance of the requirements of Part 2 of Art. 18.1 of the Law on Personal Data, this Policy is published in the public domain on the Internet information and telecommunications network on the Operator’s website.

1.5. Basic concepts used in the Policy:

personal data - any information related to a directly or indirectly identified or identifiable individual (the subject of personal data);

personal data operator (operator) - a state body, municipal body, legal or natural person, independently or jointly with other persons organizing and (or) implementing of the personal data processing, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data;

personal data processing - any action (operation) or set of actions (operations) with personal data performed with or without the use of automation tools. Personal data processing includes, among other things:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- clarification (update, change);
- extraction;
- using;
- transmission (distribution, provision, access);

- depersonalization;
- blocking;
- deletion;
- termination;

automated personal data processing - personal data processing using computer technology;

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

provision of personal data - actions aimed at disclosing 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 where processing is necessary to clarify personal data);

termination 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 media of personal data are destroyed;

depersonalization of personal data - actions as a result of which it becomes impossible, without the use of additional information, to determine the ownership of personal data to a specific subject of personal data;

personal data information system - a set of personal data contained in databases and information technologies and technical means that ensure their processing;

cross-border transfer of personal data - transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

1.6. Basic 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 the obligations provided for by the Law on Personal Data and regulations adopted in accordance with it, unless otherwise provided by the Law on Personal Data or other federal laws;
- 2) entrust personal data processing to another person with the consent of the subject of personal data, unless otherwise provided by federal law, on the basis of an agreement concluded with this person. The person processing personal data on behalf of the Operator is obliged to comply with the principles and rules for processing personal data provided for by the Law on Personal Data;
- 3) If the subject of personal data withdraws his/her consent to personal data processing, the Operator has the right to continue processing personal data without the consent of the subject of personal data if there are the legal grounds specified in the Law on Personal Data.

1.6.2. The operator is obliged to:

- 1) organize personal data processing in accordance with the requirements of the Law on Personal Data;
- 2) respond to requests and inquiries from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law ;
- 3) report to the authorized body charged for the protection of the rights of personal data subjects (Federal Service for Supervision of Communications, Information Technologies and Mass Communications (in short – Roskomnadzor)) at the request of this body the necessary information within 30 days from the date of receipt of such a request.

1.7. Basic rights of the subject of personal data. The subject of personal data has the right to:

- 1) receive information regarding the processing of his/her personal data, except for cases provided for by federal laws. The information is provided to the subject of personal data by the Operator in an accessible form, and it should not contain personal data relating to other subjects of personal data, except in cases where there are legal grounds for the disclosure of such personal data. The list of information and the procedure for obtaining it is established by the Law on Personal Data;
- 2) require the operator to clarify his/her personal data, block it or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as take measures provided by the law to protect their rights;

- 3) put a condition of prior consent when processing personal data in order to promote the goods, works and services on the market;
- 4) appeal to Roskomnadzor or in court against unlawful actions or inaction of the Operator when processing his/her personal data.

1.8. Supervision over the compliance with the requirements of this Policy is implemented by an authorized person who is in charge for organizing personal data processing by the Operator.

1.9. Responsibility for violation of the requirements of the legislation of the Russian Federation and regulations of ASIAEXPO LLC in the field of processing and protection of personal data is determined in accordance with the legislation of the Russian Federation.

2. Purposes of collecting personal data

2.1. Personal data processing is limited to the achievement of specific, pre-defined and legitimate purposes. No personal data processing that is incompatible with the purposes of collecting personal data is allowed.

2.2. Only personal data that meets the purposes of their processing are subject to processing.

2.3. Personal data processing by the Operator is implemented for the following purposes:

- ensuring compliance with the Constitution of the Russian Federation, federal laws and other regulatory legal acts of the Russian Federation;
- carrying out its activities in accordance with the charter of ASIAEXPO LLC;
- conducting personnel records;
- assistance to employees in finding employment, obtaining education and career advancement, ensuring the personal safety of employees, monitoring the quantity and quality of work performed, ensuring the safety of property;
- attracting and selecting candidates for work with the Operator;
- organizing individual (personalized) registration of employees in the compulsory pension insurance system;
- filling out and submitting required reporting forms to executive authorities and other authorized organizations;
- implementation of civil law relations;
- accounting;
- implementation of access control;
- for the other lawful purposes.

2.4. Personal data processing of employees may be implemented solely for the purpose of ensuring the compliance with the laws and the other regulations.

3. Legal grounds for 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:

- Constitution of the Russian Federation;
- Civil Code of the Russian Federation;
- Labor Code of the Russian Federation;
- Tax Code of the Russian Federation;
- Federal Law of December 26, 1995 No. 208-FZ “On Joint-Stock Companies”;
- Federal Law of December 6, 2011 No. 402-FZ “On Accounting”;
- Federal Law of July 27, 2006 No. 152-FZ “On Personal Data”;
- Federal Law of December 15, 2001 No. 167-FZ “On Compulsory Pension Insurance in the Russian Federation”

- Decree of the President of the Russian Federation dated March 6, 1997 No. 188 “On approval of the List of Confidential Information”;
 - Decree of the Government of the Russian Federation dated September 15, 2008 No. 687 “On approval of the Regulations on the specifics of processing personal data carried out without the use of automation tools”;
 - Decree of the Government of the Russian Federation dated November 1, 2012 No. 1119 “On approval of requirements for the protection of personal data during their processing in personal data information systems”;
 - other regulatory legal acts regulating relations related to the activities of the Operator.
- 3.2. The legal basis for personal data processing is also:
- Articles of Association of ASIAEXPO LLC
 - agreements concluded between the Operator and the subjects of personal data;
 - consent of the personal data subjects for the processing of their personal data.

4. Volume and categories of personal data processed, categories of personal data subjects

4.1. The content and volume of personal data processed must correspond to the stated purposes of processing provided for in Section 2 of this Policy. The personal data processed should not be excessive or 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.

4.2.1. Candidates for employment with the Operator:

- full name;
- sex;
- nationality;
- date and place of birth;
- contact details;
- information on education, work experience, qualifications;
- other personal data provided by the candidates in their CV, resumes and cover letters.

4.2.2. Employees and the former employees of the Operator:

- full name;
- sex;
- nationality;
- date and place of birth;
- image (photo);
- passport details;
- registration address at the place of residence;
- address of the actual residence;
- contact details;
- taxpayer’s individual number;
- individual personal account insurance number (SNILS);
- information about education, qualifications, professional training and advanced training;
- marital status, presence of children, family ties;
- information about work activity, including the presence of incentives, awards and (or) disciplinary sanctions;
- marriage registration data;
- information about military registration;
- information about disability;
- information about alimony deduction from the salary;
- information about income from the previous employment;
- other personal data provided by employees in accordance with the requirements of labor

legislation.

4.2.3. Family members of the Operator's employees:

- full name;
- relation degree;
- year of birth;
- other personal data provided by employees in accordance with the requirements of labor legislation.

4.2.4. Clients and counterparties of the Operator (individuals):

- full name;
- date and place of birth;
- passport details;
- registration address at the place of residence;
- contact details;
- occupied office position;
- place of work;
- other personal data provided by clients and counterparties (individuals) necessary for the conclusion and execution of contracts.

4.2.5. Representatives (employees) of the Operator's clients and counterparties (legal entities):

- full name;
- passport details;
- contact details;
- position to be filled;
- other personal data provided by the representatives (employees) of the clients and counterparties necessary for concluding and executing contracts.

4.3. The Processing by the Operator of biometric personal data (information that characterizes the physiological and biological characteristics of a person, on the basis of which his/her identity can be established) is made in accordance with the legislation of the Russian Federation.

4.4. The operator does not process special categories of personal data relating to race, ethnicity, political views, religious or philosophical beliefs, health status, intimate life, except for cases provided for by the legislation of the Russian Federation.

5. Procedure and conditions for processing personal data

5.1. Personal data processing is implemented by the Operator in accordance with the requirements of the legislation of the Russian Federation.

5.2. Personal data processing is carried out with the consent of the subjects of personal data for the processing of their personal data, as well as without it in cases provided for by the legislation of the Russian Federation.

5.3. Personal data is processed in the following ways:

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

5.4. Employees of the Operator, whose job responsibilities include personal data processing, are allowed to process personal data.

5.5. Personal data processing is made by:

- receiving personal data orally and in writing directly from the subjects of personal data;
- obtaining personal data from publicly available sources;
- entering personal data into journals, registers and information systems of the Operator;

- use of other methods of processing personal data.

5.6. Disclosure to third parties and dissemination of personal data without the consent of the subject of personal data is not permitted, unless otherwise provided by federal law.

5.7. The personal data to the inquiry and investigation authorities or bodies, to the Federal Tax Service, the Pension Fund of the Russian Federation, the Social Insurance Fund and other authorized executive authorities and organizations is transferred in accordance with the requirements of the legislation of the Russian Federation.

5.8. The operator takes the necessary legal, organizational and technical measures to protect the personal data from unauthorized or accidental access, termination, modification, blocking, distribution and other unauthorized actions, including:

- detecting the threats to the security of personal data during their processing;
- appointing persons responsible for ensuring the security of personal data;
- creating the necessary conditions for working with personal data;
- organizing recording of documents containing personal data;
- organizing the work with information systems in which personal data is processed;
- storing the personal data under conditions that ensure their safety and prevent unauthorized access to them;
- organizing the training for the Operator's employees processing personal data.

5.9. The operator stores the personal data in a form that allows identifying the subject of personal data for no longer than required by the purposes of processing personal data, unless the storage period for personal data is established by the federal law or agreement.

5.10. When collecting the personal data, including through the information and telecommunications network Internet, the Operator ensures recording, systematization, accumulation, storage, clarification (updating, changing), extraction of personal data of nationals of the Russian Federation using databases located on the territory of the Russian Federation, except for the cases specified in the Law on Personal Data.

6. Updating, correction, deletion and termination of personal data, responses to requests from subjects for access to personal data

6.1. Confirmation of the fact of personal data processing by the Operator, legal grounds and purposes of processing personal data, as well as other information specified in Part 7 of Art. 14 of the Law on Personal Data are provided by the Operator to the subject of personal data or his/her representative upon application or upon receipt of a request from the subject of personal data or his/her representative. The information provided does not include personal data relating to other subjects of personal data, unless there are legal grounds for disclosing such personal data.

The request must contain:

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

The request can be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

If the appeal (request) of the personal data subject does not specify all the necessary information in accordance with the requirements of the Personal Data Law or the subject does not have the rights to access the requested information, then a reasoned refusal is sent to him/her/it.

The right of the subject of personal data to access his /her personal data may be limited in accordance with Part

8 of Art. 14 of the Law on Personal Data, including if the personal data subject's access to his /her personal data violates the rights and legitimate interests of third parties.

6.2. If inaccurate personal data is found when contacting the subject of personal data or his /her representative or at their request or at the request of Roskomnadzor, the Operator blocks personal data relating to this subject of personal data from the moment of such request or receipt of the specified request for the period of verification, if the blocking of personal data does not violate the rights and legitimate interests of the subject of personal data or third parties.

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

6.3. If unlawful or unauthorized personal data processing is found upon an appeal (request) from the subject of personal data or his /her representative or Roskomnadzor, the Operator shall block the unlawful or unauthorized processed personal data related to this subject of personal data from the moment of such application or receipt of the request.

6.4. When the goals of processing personal data are achieved, and if the subject of personal data withdraws consent to their processing, the personal data is subject to termination if:

- otherwise is not provided for by the agreement to which the subject of personal data is a party, beneficiary or guarantor;
- the operator does not have the right to process without the consent of the subject of personal data on the grounds provided for by the Law on Personal Data or other federal laws;
- otherwise is not provided for in another agreement between the Operator and the subject of personal data.