Annex to

Order of NovaWind JSC

No. 716/171-П dated 20 09 2018

***NOVAWIND JSC PERSONAL DATA PROCESSING POLICY***

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# GENERAL PROVISIONS

* 1. This Personal Data Processing Policy (hereinafter, the Policy) is based on the requirements stated in Federal Law No. 152-ФЗ Concerning Personal Data as well as recommendations of the Federal Agency for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor) to drawing up a document defining the policy of the operator in respect of personal data processing.
	2. This Policy shall apply to processing of restricted information which relates to personal data under the laws of the Russian Federation.

The personal data shall mean any information which relates, directly or indirectly, to a certain or defined individual person (the personal data owner).

Personal data processing shall mean any action, transaction or cumulative actions, transactions involving personal data which are performed with or without automation means. Personal data processing shall include collecting, recording, filing, accumulation, storage, keeping current (updating or amending), retrieval, use, transfer (dissemination, provision, and access), depersonalization, blocking, deleting, destruction.

* 1. This Policy shall define principles, purposes, conditions of and the procedure for processing the personal data of employees of NovaWind JSC (hereinafter, the Company) and other owners whose personal data are processed by the Company.
	2. This Policy is a public document and is freely available on the official website of the Company in the Internet (<http://www.novawind.ru>).

# PURPOSES OF PERSONAL DATA COLLECTION

* 1. The Company processes personal data for the purposes of employment, establishing employment relations, ensuring security of employees as well as providing employees with remuneration and benefits envisaged by laws or under internal regulations of the Company.

# LEGAL FRAMEWORK FOR PERSONAL DATA PROCESSING

* 1. The Company shall process the personal data of employees in compliance with:
		+ the Labour Code of the Russian Federation, other federal laws and subordinate legislation stating the rules of employment law;
		+ the Company’s Articles of Association;
		+ the Employment Agreement entered into by and between the Company and the employee;
		+ the Consent to process the personal data of the employee.

# CATEGORIES OF PERSONAL DATA OWNERS

* 1. The owners whose personal data are processed by the Company with or without automation means include:
		+ applicants;
		+ employees of the Company;
		+ interns/trainees engaged by the Company;
		+ contractors of the Company who are individual entrepreneurs;
		+ visitors of the Company.

# CATEGORIES OF PERSONAL DATA

* 1. The Company processes personal data of the following categories:
		+ personal data of general category (other personal data) which do not qualify for personal data of special categories;
		+ biometric personal data;
		+ publicly available personal data.

# PROCEDURE FOR AND CONDITIONS OF PERSONAL DATA PROCESSING

* 1. The Company has arranged for private record management system. The system allows to establish, handle and store documents in respect of the staff

and other documents stating personal data with a view to prevent unauthorized use of such data.

* 1. Access to personal data shall be granted only to those employees of the Company who need such access to carry out their job duties. The list of the employees of the Company who are granted with access to personal data is approved by the Regulation on securing the personal data of the employees of the Company. Such employees shall undertake in writing to keep the personal data confidential.
	2. In cases stipulated by the laws of the Russian Federation, the Company shall process personal data without any special consent to such processing granted by the owner of personal data. In other cases, the Company asks the owner of personal data to grant written consent to process its personal data. At any moment, the owner can withdraw its consent to process the personal data.
	3. The Company shall cease to process personal data in the following cases when:
		+ the purpose of processing personal data is achieved;
		+ the period for processing personal data which is envisaged by the laws of the Russian Federation, the agreement or consent granted by the owner of personal data to process its personal data is expired;
		+ the owner of personal data withdraws its consent to process personal data in cases allowed by the laws of the Russian Federation.
	4. The Company shall not transfer personal data to any third parties without written consent from the owner of personal data except as envisaged by the laws of the Russian Federation.

# UPDATE, AMENDMENT, DELETION AND DESTRUCTION OF PERSONAL DATA. ANSWERS TO THE OWNERS’ REQUESTS IN RESPECT OF THE ACCESS TO PERSONAL DATA

* 1. The Company shall notify the owner of personal data, upon its request, of any available personal data relating to the owner within the period specified by the laws of the Russian Federation.
	2. The Company shall clarify personal data based on information provided by the owner of personal data within the period envisaged by the laws of the Russian Federation.
	3. In the event unauthorized processing of personal data is detected, the Company shall cease such unauthorized processing of personal data within the period envisaged by the laws of the Russian Federation.
	4. In the event the purpose for processing personal data is achieved, the Company shall cease to process the personal data of the owner and destroy its personal data within the period envisaged by the laws of the Russian Federation.
	5. In the event the owner of personal data withdraws its consent to process the personal data, the Company ceases to process such data within the period envisaged by the laws of the Russian Federation.

# LIABILITY

* 1. The Company shall be liable for the compliance of personal data processing with the laws of the Russian Federation.
	2. The employees of the Company who have access to personal data shall be obliged to keep confidential any personal data the access to which they were granted when performing their job duties.
	3. The employees of the Company guilty of violating the rules regulating personal data processing shall be held liable for damages and subject to disciplinary procedures, civil, criminal and other liability under the laws of the Russian Federation and internal regulations of the Company applicable to handling of personal data.