

**Personal Data
Processing Policy
in the joint-stock company «Russian Railways Business Asset»**

1. General Provisions.

1.1 The Policy of Personal Data Processing in Joint Stock Company «Russian Railways Business Asset» (hereinafter - the Policy), in accordance with the Federal Law of July 27, 2006 No. 152-FL «On Personal Data» (hereinafter – the Federal Law «On Personal Data») establishes the purposes, basic principles and rules of personal data processing and determines the main measures to ensure their security.

1.2 The Policy has been developed to implement the legislative requirements of the Russian Federation in the field of personal data in Joint Stock Company «Russian Railways Business Asset» and to ensure the protection of the rights and freedoms of individuals when processing their personal data.

1.3 The provisions of the Policy are the basis for the development and updating of regulatory and organizational-legal documents (hereinafter - regulatory documents) of the joint-stock company «Russian Railways Business Asset» regulating the processing of personal data of various categories of personal data subjects, as well as the procedure for implementing measures to protect processed personal data.

The development of aforementioned regulatory documents is carried out in accordance with the procedure established in the joint-stock company «Russian Railways Business Asset».

1.4 The provisions of the Policy are binding on employees of the joint-stock company «Russian Railways Business Asset» who have access to personal data.

1.5 The following terms/abbreviations are used in the Policy:

Term/abbreviation	Definition
Company	Joint-stock company «Russian Railways Business Asset».
Personal Data	Any information relating to, directly or indirectly, specific or identifiable individual (personal data subject)
Personal data security	The state of personal data protection, characterized by the ability of users, technical means and information technologies to ensure confidentiality, integrity and availability of personal data during its processing in information systems
Biometric personal data	Information that characterizes physiological and biological features of a person, on the basis of which it is possible to establish their identity and which is used by the Company to establish the identity of the personal data subject
Personal data protection	Activities aimed at preventing the leakage of protected personal data, as well as unauthorized and unintentional influences on protected personal data

Distribution of personal data	Actions aimed at disclosure of personal data to an indefinite number of individuals
Information system	A totality of information (personal data) contained in databases and information technologies and technical means ensuring its processing
Confidentiality of personal data	Mandatory requirement not to disclose to third parties and not to allow distribution of personal data without the consent of personal data subjects or other legal basis
Personal data processing	Any action (operation) or set of actions (operations) performed with or without the use of automation means 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
Personal Data	Any information relating to, directly or indirectly, specific or identifiable individual (personal data subject)
Personal data subjects	Individuals and/or representatives of legal entities that are current, potential and former counterparties of the Company, current and former employees of the Company and their close relatives, candidates for employment (job applicants) and their close relatives, individuals who have civil legal relations with the Company, students and pupils of educational institutions who undergo practical training in the Company, visitors of the Company's website on the Internet, as well as other persons whose personal data became known to the Company due to the provision of social benefits, guarantees, compensations or services to such persons by the Company
Cross-border transfer of personal data	Transfer of personal data to the territory of a foreign state to a foreign authority, a foreign natural person or a foreign legal entity
Special categories of personal data	Personal data of personal data subjects concerning race, nationality, political opinions, religious or philosophical beliefs, health status, intimate life and criminal record
Destruction of personal data	Actions, as a result of which it becomes impossible to restore the contents of personal data in the information system and (or) as a result of which material carriers of personal data are destroyed

2. Purposes of personal data processing.

2.1 The Company shall process personal data for the purposes of:

- conclusion and execution of transportation, freight forwarding and other contracts concluded by the Company within the framework of its activities, provision of additional services during transportation;
- providing information on services rendered, development of new products and services;
- collection and development of ideas aimed at improving the management of the transportation process;
- conducting surveys, marketing, statistical and other research activities;

execution of contracts concluded with individuals who have contractual and other civil legal relations with the Company;

regulating labor relations with employees and civil law relations with individuals, as well as ensuring proper personnel records management, including recruitment and selection of candidates for employment;

ensuring compliance with the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation, and local regulations of the Company;

performance of functions, authorities and duties assigned to the Company by the legislation of the Russian Federation;

fulfillment of social obligations, as well as for other purposes stipulated by the legislation of the Russian Federation, the Articles of Association and local regulations of the Company.

3. Principles and rules of personal data processing.

3.1 The Processing of personal data in the Company shall be carried out in compliance with the principles and rules stipulated by the Federal Law "On Personal Data" and shall take into account the need to ensure the protection of the rights and freedoms of personal data subjects, including the protection of the right to privacy, personal and family secrecy, namely:

processing is conducted in a legal and fair manner;

processing is limited to achieving specific, predetermined and legitimate purposes;

personal data corresponding to the purposes of processing shall be processed, provided that its scope and content necessarily correspond to the stated purposes of processing;

merging of databases containing personal data processed for incompatible purposes is not allowed;

during processing, the accuracy and sufficiency of personal data and, if necessary, relevance in relation to the purposes of processing are ensured by taking measures to delete or clarify incomplete or inaccurate data or ensuring that such measures are taken;

personal data shall be stored in a form that allows identification of the subject of personal data for no longer than required by the purposes of personal data processing, unless the period of personal data storage is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor;

processed personal data shall be destroyed or depersonalized upon achievement of the purposes of processing or in case of loss of necessity to achieve these purposes, unless otherwise provided for by the legislation of the Russian Federation.

3.2 The Company shall process personal data with the consent of the subject of personal data, unless otherwise provided for by the legislation of the Russian Federation.

3.3 When processing personal data, the Company shall keep such data confidential.

4. Rights of the subject of personal data.

4.1 The subject of personal data has the right to:

receive full information regarding the Company's processing of their personal data, except for cases stipulated by the legislation of the Russian Federation;

require clarification, blocking or destruction of personal data if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;

require notification of all persons who have been previously informed of incorrect or incomplete personal data about any changes made to them;

withdraw consent to the processing of their personal data;
to appeal against the Company's actions or omissions in the processing of their personal data in accordance with the laws of the Russian Federation;
exercise other rights provided for by the legislation of the Russian Federation.

5. Categories and volume of processed personal data.

5.1 The content and volume of the processed personal data are determined by the purposes of its processing as set out in clause 2.1. of the Policy, and shall be specified in the consent of the personal data subject to the processing of their personal data, except in cases where the processing of personal data may be carried out without obtaining such consent.

5.2 Processing of personal data that is redundant in relation to the stated purpose of their processing is not allowed.

5.3 Personal data authorized by the subject of personal data for disclosure shall be determined on the basis of the consent to the processing of personal data authorized by the subject of personal data for disclosure provided by the subject of personal data to the Company.

5.4 Personal data placed by the Company in publicly available sources of personal data (corporate directories, corporate e-mail, address books) shall be included with the written consent of the subject of personal data.

5.5 Special categories of personal data, as well as biometric personal data of personal data subjects shall be processed by the Company in accordance with the procedures established by the legislation of the Russian Federation.

6. Organization of personal data processing.

6.1 In order to realize the rights of personal data subjects while processing their personal data, the Company shall:

take the necessary measures to fulfill the obligations stipulated by the legislation of the Russian Federation;

clarify to the subject of personal data the legal consequences of refusal to provide personal data, if it is mandatory in accordance with the legislation of the Russian Federation;

implement blocking, clarification and destruction of unlawfully processed personal data, as well as terminate their unlawful processing;

notify the personal data subject on elimination of the committed violations or destruction of their personal data;

provide, at the request of a personal data subject or their representative, information regarding the processing of their personal data in accordance with the procedure established by the legislation of the Russian Federation and the Company's regulatory documents.

develop and update the Company's regulatory documents on personal data processing and protection and bring them to the attention of relevant personal data subjects;

take legal, organizational and technical measures to protect personal data, including data processed in information systems, against illegal or accidental access to it, destruction, modification, blocking, copying, dissemination of personal data, as well as against other illegal actions in relation to personal data;

exercise internal control over the Company's compliance with the requirements of the legislation of the Russian Federation and the Company's regulatory documents in the field of personal data, including personal data protection requirements;

properly process appeals and requests of personal data subjects or their

representatives, including those related to personal data legislation violations committed by the Company's employees;

interact with state authorities on matters concerning the protection of personal data.

6.2 Processing of personal data in the Company shall be carried out by means of computer equipment (automated processing) or with the direct participation of a person without the use of computer equipment (non-automated processing).

6.3 The Company's managers authorized by the employer and only those employees of the Company whose job description includes personal data processing shall be allowed to process personal data.

Such managers and employees have the right to process only the personal data necessary for the performance of their job duties.

6.4 The transfer of personal data to third parties (including cross-border transfer) shall be carried out with the written consent of personal data subjects, except for cases when it is necessary in order to prevent a threat to the life and health of personal data subjects, as well as in other cases established by the legislation of the Russian Federation.

When transferring personal data to third parties in accordance with concluded contracts, the Company shall ensure mandatory fulfillment of the requirements of the legislation of the Russian Federation and local regulatory acts of the Company in the field of personal data.

6.5 Transfer of personal data to state authorities (Federal Tax Service of the Russian Federation, Russian Federation Pension Fund, Russian Federation Federal Compulsory Medical Insurance Fund, etc.) shall be carried out in accordance with the requirements of the legislation of the Russian Federation.

6.6 The transfer of personal data during its processing in information systems is carried out through communication channels, the protection of which is ensured through the implementation of appropriate organizational and technical measures that ensure the neutralization of current security threats in accordance with Article 19, Section 5 of the Federal Law «On Personal Data».

6.7 Transborder transfer of personal data to the territories of foreign states that are parties to the Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (hereinafter referred to as the Convention), as well as other foreign states that ensure adequate protection of the rights of personal data subjects, shall be carried out in accordance with the Federal Law «On Personal Data» and may be prohibited or restricted in order to protect the constitutional order of the Russian Federation, morality, health, rights and legitimate interests of the Russian Federation.

Transborder transfer of personal data to the territory of a foreign state, which is not a party to the said Convention, shall be carried out in accordance with the legislative acts of the Russian Federation, provided that the legal norms in force in this state and the applied personal data security measures comply with the provisions of the Convention.

6.8 The Company has the right to entrust the processing of personal data to another legal entity, individual entrepreneur or individual with the consent of the subjects of personal data on the basis of a concluded contract, an essential condition of which is the obligation to ensure by the contractor the conditions of confidentiality of personal data and its security during transmission and processing.

6.9 When collecting personal data, including by using the information and telecommunications network Internet, the Company shall ensure recording, systematization, accumulation, storage, clarification (update, change), extraction of personal data of citizens of the Russian Federation using databases located in the territory of the Russian Federation, except for cases stipulated by the legislation of the Russian Federation.

6.10. The terms of storage of personal data in the Company shall be determined in accordance with the legislation of the Russian Federation and the Company's regulatory documents.

6.11. Ensuring the security of personal data, including during its processing in information systems, shall be carried out in accordance with the legislation of the Russian Federation and the requirements of the authorized state authority for the protection of the rights of personal data subjects, the federal executive body authorized in the field of security, and the federal executive body authorized in the field of countering technical intelligence and technical protection of information.

Final provisions

7.1 Responsibility for violation of the requirements of the legislation of the Russian Federation and the Company's regulatory documents in the field of personal data shall be determined in accordance with the legislation of the Russian Federation.

7.2 The Policy is a publicly available document and shall be posted on the Company's official website.