

PERSONAL DATA PROCESSING AND PROTECTION POLICY

I. GENERAL PROVISIONS

1.1. In order to comply with the legislation of the Russian Federation regulating relations related to the processing and ensuring the security of personal data, as well as maintaining the business reputation of the Limited Liability Company "Sladeia" (hereinafter referred to as LLC "Sladeia") considers its tasks to be compliance with the principles of legality, fairness and confidentiality in the processing of personal data, as well as ensuring the security of their processing processes.

1.2. This Policy on the processing and protection of personal data in LLC "Sladeia" (hereinafter referred to as the Policy):

1.2.1. Discloses the main categories of personal data processed by LLC "Sladeia", the purposes, methods and principles of personal data processing, the rights and obligations of LLC "Sladeia" when processing personal data, the rights of personal data subjects.

1.2.2. Is a publicly available document declaring the conceptual foundations of "Sladeia" LLC's activities when processing personal data.

1.3. Terms and definitions used in the Policy:

1.3.1. Biometric personal data - information that characterizes the physiological and biological characteristics of a person, on the basis of which his identity can be established and which are used by the operator to establish the identity of the personal data subject.

1.3.2. Blocking personal data - temporary cessation of personal data processing (except for cases where processing is necessary to clarify personal data).

1.3.3. Access to information (access) – familiarization with information, its processing, in particular, copying, modification or destruction of information.

1.3.4. Personal data information system (hereinafter referred to as PDIS) – a set of personal data contained in databases and information technologies and technical means that ensure their processing.

1.3.5. Unauthorized access (UA) – access to information stored on various types of media (paper, magnetic, optical, etc.) in computer databases, file storage, archives, classified partsetc, etc. of various organizations by changing (increasing, falsifying) one's access rights.

1.3.6. Information carrier – any material object or environment used to store or transmit information.

1.3.7. Personal data (hereinafter – PD) – any information related to a directly or indirectly determined or determinable individual (subject of personal data).

1.3.8. Operator — a government agency, municipal agency, legal entity or individual that independently or jointly with other persons organizes and (or) carries out the processing of personal data, as well as determines the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data. The Operator is LLC Sladeia.

1.3.9. Processing of personal data — any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

1.3.10. Provision of personal data — actions aimed at disclosing personal data to a specific person or a specific circle of persons.

1.3.11. Dissemination of personal data — actions aimed at disclosing personal data to an indefinite circle of persons.

1.3.12. Special categories of personal data – categories of personal data related to race, nationality, political views, religious or philosophical beliefs, health status, intimate life.

1.3.13. Subject of personal data (subject) – an individual who is directly or indirectly determined or determinable using personal data.

1.3.14. Cross-border transfer of personal data – transfer of personal data to the territory of a foreign state to a foreign government body, a foreign individual or a foreign legal entity.

1.3.15. Destruction of personal data – actions that make it impossible to restore the content of personal data in the personal data information system and (or) as a result of which the tangible carriers of personal data are destroyed.

1.4. Basic rights of personal data subjects:

1.4.1. The personal data subject has the right to receive information about the processing of his personal data in LLC Sladeia;

1.4.2. The personal data subject has the right to demand from LLC Sladeia, which processes them, clarification of these personal data, their blocking or destruction if they are incomplete, outdated, inaccurate, illegally obtained or cannot be recognized as necessary for the stated purpose of processing, and also to take measures provided by law to protect their rights;

1.4.3. The right of the personal data subject to access his personal data may be limited in accordance with federal laws;

1.4.4. To exercise his rights and protect his legitimate interests, the personal data subject has the right to contact LLC Sladeia. The latter considers any requests and complaints from personal data subjects, thoroughly investigates violations and takes all necessary measures to immediately eliminate them, punish the guilty parties and settle disputes and conflicts out of court;

1.4.5. The personal data subject has the right to appeal the actions or inactions of LLC Sladeia by contacting the authorized body for the protection of the rights of personal data subjects (the territorial body of the Federal Service for Supervision of Communications, Information Technology and Mass Media);

1.4.6. The personal data subject has the right to protect their rights and legitimate interests, including compensation for damages and/or compensation for moral damage in court.

1.5. Primary responsibilities in LLC Sladeia:

1.5.1. Comply with the requirements of the Russian Federation legislation in the field of processing and protecting personal data;

1.5.2. When collecting personal data, provide the personal data subject, at his request, with information regarding the processing of personal data;

1.5.3. If the provision of personal data is mandatory in accordance with federal law, employees of LLC Sladeia are obliged to explain to the subject of personal data the legal consequences of refusing to provide his personal data;

1.5.4. When collecting personal data, including through the information and telecommunications network "Internet", ensure the recording, systematization, accumulation, storage, clarification (updating,

modification), extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation;

1.5.5. Publish or otherwise provide unlimited access to the current document defining its policy regarding the processing of personal data, to information on the implemented requirements for the protection of personal data (this Policy);

1.5.6. Take the necessary legal, organizational and technical measures or ensure their adoption to protect personal data from unauthorized or accidental access to them;

1.5.7. Inform the subject of personal data or his representative of the availability of personal data related to the relevant subject of personal data, and also provide the opportunity to become familiar with this personal data upon request of the subject of personal data or his representative;

1.5.8. Clarify the personal data of the Subjects, block or destroy them if they are incomplete, outdated, inaccurate, illegally obtained or cannot be recognized as necessary for the stated purpose of processing;

1.5.9. Stop processing personal data if the subject of personal data revokes consent to the processing of his personal data. LLC Sladeia has the right to continue processing personal data without the consent of the subject of personal data if there are grounds specified in paragraphs 2 - 11 of Part 1 of Article 6, Part 2 of Article 10 and Part 2 of Article 11 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data".

1.5.10. If the personal data subject requests that LLC Sladeia cease processing the personal data, LLC Sladeia shall cease processing the personal data or ensure that such processing is ceased within a period not exceeding ten business days from the date of receipt by LLC Sladeia of the relevant request. The specified period may be extended, but by no more than five business days, if LLC Sladeia sends the personal data subject a reasoned notice stating the reasons for extending the period for providing the requested information. LLC Sladeia has the right to continue processing the personal data without the consent of the personal data subject if there are grounds specified in paragraphs 2–11 of Part 1 of Article 6, Part 2 of Article 10, and Part 2 of Article 11 of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data". 1.5.11. In the event of establishing the fact of illegal or accidental transfer (provision, distribution, access) of personal data, which resulted in the violation of the rights of personal data subjects, LLC Sladeia is obliged, from the moment of detection of such an incident by LLC Sladeia, Roskomnadzor or another interested party, to notify Roskomnadzor within 24 hours of the incident that occurred, of the alleged reasons that resulted in the violation of the rights of personal data subjects and the alleged harm caused to the rights of personal data subjects, of the measures taken to eliminate the consequences of the relevant incident, and also provide information about the person authorized by LLC Sladeia to interact with Roskomnadzor on issues related to the identified incident. Within 72 hours, notify Roskomnadzor of the results of the internal investigation of the identified incident, and also provide information about the persons whose actions caused the identified incident (if any).

II. PURPOSES OF COLLECTING PERSONAL DATA

2.1. LLC Sladeia processes personal data of the following categories of personal data subjects (hereinafter referred to as Subjects):

2.1.1. Employees.

2.1.2. Relatives of employees.

2.1.3. Dismissed employees.

2.1.4. Job seekers.

2.1.5. Interns.

2.1.6. Clients.

2.1.7. Counterparties.

2.1.8. Representatives of counterparties.

2.1.9. Citizens (under a civil-law contract).

2.1.10. Visitors.

2.1.11. Website visitors.

2.2. LLC Sladeia processes personal data of employees solely for the purposes of:

2.2.1. Maintaining personnel and accounting records;

2.2.2. Ensuring compliance with the labor legislation of the Russian Federation;

2.2.3. Ensuring compliance with the tax legislation of the Russian Federation;

2.2.4. Ensuring compliance with the pension legislation of the Russian Federation;

2.2.5. Opening an account in the bank of PJSC "BANK URALSIB", issuing cards, ensuring settlement transactions;

2.2.6. Undergoing medical examinations;

2.2.7. Undergoing professional retraining, education, advanced training;

2.2.8. Manufacturing passes;

2.2.9. Posting information on the official website, corporate portal and in social networks.

2.3. LLC Sladeia processes personal data of employees' relatives solely for the purposes of maintaining personnel and accounting records.

2.4. LLC Sladeia processes the personal data of dismissed employees solely for the purposes of maintaining personnel and accounting records.

2.5. LLC Sladeia processes the personal data of job seekers solely for the purposes of recruiting personnel (job seekers) for vacant positions.

2.6. LLC Sladeia processes the personal data of interns solely for the purposes of ensuring the completion of introductory, industrial or pre-graduation practice on the basis of an agreement with an educational institution.

2.7. LLC Sladeia processes the personal data of clients solely for the purposes of concluding and fulfilling obligations under agreements.

2.8. LLC Sladeia processes the personal data of counterparties solely for the purposes of concluding and fulfilling obligations under agreements.

2.9. LLC Sladeia processes the personal data of counterparty representatives solely for the purposes of concluding and fulfilling obligations under agreements.

2.10. LLC Sladeia processes personal data of citizens (under a civil-law contract) solely for the purpose of preparing, concluding and executing a civil-law contract.

2.11. LLC Sladeia processes personal data of visitors solely for the purpose of ensuring access control to the territory.

2.12. LLC Sladeia processes personal data of website visitors solely for the purpose of information and reference services.

III. LEGAL BASIS FOR PROCESSING PERSONAL DATA

3.1. The legal basis for processing personal data is a set of legal acts, pursuant to which and in accordance with which LLC Sladeia processes personal data.

3.2. Personal data is processed by LLC Sladeia in accordance with the following legal grounds:

3.2.1. The Constitution of the Russian Federation (adopted by popular vote on 12.12.1993 with amendments approved during the all-Russian vote on 01.07.2020);

3.2.2. The Labor Code of the Russian Federation dated 30.12.2001 No. 197-FZ;

3.2.3. The Civil Code of the Russian Federation (Part One of November 30, 1994 No. 51-FZ, Part Two of January 26, 1996 No. 14-FZ, Part Three of November 26, 2001 No. 146-FZ, Part Four of December 18, 2006 No. 230-FZ);

3.2.4. The Criminal Code of the Russian Federation of June 13, 1996 No. 63-FZ;

3.2.5. The Code of the Russian Federation on Administrative Offenses of December 30, 2001 No. 195-FZ;

3.2.6. The Tax Code of the Russian Federation (Part One of July 31, 1998, No. 146-FZ, and Part Two of August 5, 2000, No. 117-FZ);

3.2.7. Federal Law of December 6, 2011, No. 402-FZ "On Accounting";

3.2.8. Federal Law of October 22, 2004, No. 125-FZ "On Archival Affairs in the Russian Federation";

3.2.9. Federal Law of December 26, 1995, No. 208-FZ "On Joint-Stock Companies";

3.2.10. Federal Law of December 29, 2006, No. 255-FZ "On Compulsory Social Insurance in Case of Temporary Disability and in Connection with Maternity";

3.2.11. Federal Law of 01.04.1996 No. 27-FZ "On Individual (Personalized) Accounting in the Compulsory Pension Insurance System";

3.2.12. Federal Law of 15.12.2001 No. 167-FZ "On Compulsory Pension Insurance in the Russian Federation";

3.2.13. Federal Law of 24.07.1998 No. 125-FZ "On Compulsory Social Insurance against Industrial Accidents and Occupational Diseases";

3.2.14. Federal Law of 28.03.1998 N 53-FZ "On Military Duty and Military Service";

3.2.15. Order of the Minister of Defense of the Russian Federation dated 22.11.2021 No. 700 "On approval of the instructions on the organization of work to ensure the functioning of the military registration system";

3.2.16. Order of the Ministry of Education and Science of the Russian Federation dated 18.04.2013 No. 291 "On approval of the Regulation on the practice of students mastering the main professional educational programs of secondary vocational education";

3.2.17. Resolution of the Government of the Russian Federation dated 27.11.2006 N 719 "On approval of the Regulation on military registration";

3.2.18. Order of the Ministry of Labor of Russia No. 988n, the Ministry of Health of Russia No. 1420n dated 31.12.2020 "On approval of the list of harmful and (or) hazardous production factors and works,

during the performance of which mandatory preliminary medical examinations are carried out upon admission to work and periodic medical examinations";

3.2.19. Order of the Ministry of Health of Russia dated 15.06.2015 No. 344n "On mandatory medical examination of vehicle drivers (candidates for vehicle drivers)";

3.2.20. Resolution of the Board of the Pension Fund of the Russian Federation dated 27.09.2019 No. 485p "On approval of the forms and formats of information used to register citizens in the individual (personalized) accounting system, and the Procedure for filling out the forms of the specified information";

3.2.21. Order of the Federal Financial Markets Service of Russia dated 30.07.2013 N 13-65/pz-n (as amended on 16.11.2018) "On the procedure for opening and maintaining personal and other accounts by holders of registers of owners of securities and on amendments to certain regulatory legal acts of the Federal Financial Markets Service";

3.2.22. Charter of LLC Sladeia;

3.2.23. Employment contracts with employees;

3.2.24. Agreements concluded between LLC Sladeia and the subject of personal data;

3.2.25. Consents of subjects to the processing of personal data.

IV. VOLUME AND CATEGORIES OF PROCESSED PERSONAL DATA, CATEGORIES OF PERSONAL DATA SUBJECTS

4.1. The content and volume of processed personal data of Subjects correspond to the purposes of processing.

4.2. As part of the processing of personal data of employees, the minimum necessary categories of personal data are processed in the volumes required in accordance with the current legislation of the Russian Federation, in the volumes of approved forms of personnel records management and accounting, in the volumes necessary for the fulfillment of obligations under the employment contract, as well as for other purposes specified in Section II.

4.3. As part of the processing of personal data of relatives of employees, the minimum necessary list of categories of personal data is processed in the required volumes of the current legislation of the Russian Federation, in the volumes of approved forms of personnel records management and accounting.

4.4. As part of the processing of personal data of dismissed employees, the minimum necessary list of personal data categories is processed in the required volumes of the current legislation of the Russian Federation, in the volumes of approved forms of personnel records management and accounting.

4.5. As part of the processing of personal data of applicants, the minimum necessary list of personal data categories is processed to make a decision on employment.

4.6. As part of the processing of personal data of clients, the minimum necessary list of personal data categories is processed to conclude and fulfill obligations under contracts.

4.7. As part of the processing of personal data of interns, the minimum necessary list of personal data categories required for undergoing educational and industrial practice is processed.

4.8. As part of the processing of personal data of citizens (under a civil-law contract), the minimum necessary list of personal data categories is processed for the preparation, conclusion and execution of a civil-law contract.

4.9. As part of the processing of personal data of counterparties, the minimum necessary list of personal data categories is processed to conclude and fulfill obligations under contracts concluded with the relevant counterparties.

4.10. As part of the processing of personal data of counterparties' representatives, the minimum necessary list of personal data categories is processed for concluding and fulfilling obligations under contracts concluded with the relevant counterparties.

4.11. As part of the processing of visitors' personal data, the minimum necessary list of personal data categories is processed to ensure access control to the Operator's territory.

4.12. As part of the processing of personal data of website visitors, the minimum necessary list of personal data categories is processed to provide information and reference services.

4.13. LLC Sladeia does not process biometric personal data (information that characterizes the physiological and biological characteristics of a person, on the basis of which his or her identity can be established and which is used to establish the identity of the subject of personal data).

4.14. LLC Sladeia does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, health status, or intimate life.

V. PROCEDURE AND CONDITIONS FOR PROCESSING PERSONAL DATA

5.1. LLC Sladeia processes personal data of subjects for the purposes specified in Section II of this Policy.

5.2. LLC Sladeia processes the categories of personal data specified in Section IV of this Policy.

5.3. The list of personal data processed; categories of personal data; categories of subjects of personal data that are processed; methods, terms of their processing and storage; the procedure for the destruction of personal data upon achieving the purposes of their processing or upon the occurrence of other legal grounds for each purpose of processing personal data are provided in Appendix 2.

5.4. Personal data is processed in LLC Sladeia subject to the consent of the subjects of personal data or in accordance with Part 2-11 of Clause 1 of Article 6 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data". The consent of the personal data subject is executed in writing, unless otherwise established by the Federal Law "On Personal Data".

5.5. The processing of personal data of subjects includes the following actions: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), blocking, deletion, destruction of personal data.

5.6. LLC Sladeia does not carry out cross-border (on the territory of a foreign state to a government body of a foreign state, a foreign individual or a foreign legal entity) transfer of personal data.

5.7. LLC Sladeia has created publicly available sources of personal data (website, information stand). Personal data (last name, first name, patronymic, position, qualification, year of birth, etc.) reported by the subject (employee/citizen) are included in such sources only with the written consent of the personal data subject.

5.8. Collection, recording, systematization, accumulation and clarification (updating, modification) of personal data is carried out by obtaining personal data directly from personal data subjects (their legal representatives).

5.9. LLC Sladeia and employees of LLC Sladeia who have received access to personal data are obliged not to disclose to third parties or distribute personal data without the consent of the personal data subject, unless otherwise provided by federal law.

5.10. LLC Sladeia has the right to transfer personal data to inquiry and investigation bodies, other authorized bodies on the grounds stipulated by the current legislation of the Russian Federation.

5.11. If the provision of personal data is mandatory in accordance with federal law, an employee of LLC Sladeia who collects (receives) personal data directly from personal data subjects is obliged to explain to the personal data subject the legal consequences of refusing to provide his personal data.

5.12. LLC Sladeia ensures compliance with the principles of personal data processing specified in Article 5 of Federal Law 152-FZ "On Personal Data" in its activities.

5.13. LLC Sladeia takes measures in its activities provided for in Part 2 of Article 18.1, Part 1 of Article 19 of Federal Law 152-FZ "On Personal Data".

5.14. LLC Sladeia does not use databases located outside the borders of the Russian Federation for processing personal data.

5.15. Conditions for termination of personal data processing in LLC Sladeia:

5.15.1. achievement of the goals of personal data processing;

5.15.2. loss of legal grounds for personal data processing;

5.15.3. expiration of consent or revocation of consent of the personal data subject to the processing of his or her personal data;

5.15.4. detection of unlawful processing of personal data.

5.16. The storage period of personal data in a form that allows identifying the subject of personal data is no longer than required by the purposes of processing personal data, except in cases where the storage period of personal data is not established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor.

5.17. In order to comply with the legislation of the Russian Federation, to achieve the purposes of processing, as well as in the interests of and with the consent of the subjects of personal data, LLC Sladeia, in the course of its activities, provides personal data to government agencies and organizations, other organizations and companies for the purpose of fulfilling obligations to the subject of personal data, based on relevant requests and/or in accordance with the requirements established by the legislation of the Russian Federation.

VI. UPDATING, CORRECTING, DELETING AND DESTRUCTING PERSONAL DATA, RESPONSES TO REQUESTS FROM SUBJECTS FOR ACCESS TO PERSONAL DATA

6.1. In the event of detection of unlawful processing of personal data, LLC Sladeia blocks the unlawfully processed personal data.

6.2. In the event of detection of inaccurate personal data, LLC Sladeia blocks the relevant personal data for the verification period. In the event of confirmation of the fact of inaccuracy of personal data, LLC Sladeia, on the basis of information provided by the personal data subject or his representative or the authorized body for the protection of the rights of personal data subjects, or other necessary documents, clarifies the personal data and removes the blocking of the personal data.

6.3. LLC Sladeia is obliged to inform the personal data subject or his representative of information on the processing of the personal data of such subject carried out by him upon request of the latter.

6.4. Information concerning the processing of personal data shall be provided to the personal data subject or his/her representative upon receipt of a request from the personal data subject or his/her

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

6.5. Consideration of requests from personal data subjects or their representatives, as well as the authorized body for the protection of the rights of personal data subjects:

6.5.1. Personal data subjects have the right to receive information concerning the processing of their personal data, including the following:

6.5.1.1. Confirmation of the fact of personal data processing in LLC Sladeia;

6.5.1.2. Legal grounds and purposes of personal data processing;

6.5.1.3. Methods of personal data processing applied by LLC Sladeia;

6.5.1.4. The personal data being processed relating to the relevant personal data subject, the source of their receipt, unless another procedure for submitting such data is provided for by federal law;

6.5.1.5. Terms of processing personal data, including the terms of their storage in LLC Sladeia;

6.5.1.6. The procedure for the exercise by the subject of personal data of the rights stipulated by the legislation of the Russian Federation in the field of personal data;

6.5.1.7. Other information stipulated by the legislation of the Russian Federation in the field of personal data.

6.5.2. Upon receipt of a request from the Subject of personal data or his representative, as well as the authorized body for the protection of the rights of personal data subjects, LLC Sladeia provides information within the timeframes in accordance with the requirements of Article 20 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data".

6.6. Personal data subjects have the right to demand that LLC Sladeia clarify their personal data, block it or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, and to take measures provided by law to protect their rights

6.7. The right of a personal data subject to access his/her personal data may be limited in accordance with federal laws, including if the personal data subject's access to his/her personal data violates the rights and legitimate interests of third parties.

6.8. To obtain the necessary information regarding the processing of personal data described in paragraph 6.5.1. of this Policy, the Subject (or legal representative) must fill out the appropriate form for a personal data subject's request for information regarding the processing of personal data (Appendix 1 or 5) and hand it over in person to employees of LLC Sladeia who accept citizens' requests, or by mail.

6.9. To clarify certain personal data, the Subject (or legal representative) must complete the relevant form of the personal data subject's request for clarification of personal data (Appendix 2 or 6) and hand it over in person to the employees of LLC Sladeia who accept citizens' requests, or by mail.

6.10. To exclude the illegality of personal data processing, the Subject (or legal representative) must complete the relevant form of the personal data subject's request for destruction of personal data (Appendix 3 or 7) and hand it over in person to the employees of LLC Sladeia who accept citizens' requests, or by mail.

6.11. To revoke the consent of the Subject of personal data to the processing of his personal data, the subject (or legal representative) must fill out the appropriate form for revocation of consent of the subject of personal data to the processing of his personal data (Appendix 4 or 8) and hand it over in

person to the employees of LLC Sladeia who accept citizens' requests, or by mail. In the event of revocation of consent to the processing of personal data, LLC Sladeia has the right to continue processing personal data without the consent of the subject of personal data if there are grounds specified in paragraphs 2 - 11 of Part 1 of Article 6, Part 2 of Article 10 and Part 2 of Article 11 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data". 6.12. In accordance with paragraph 12 of Article 10.1 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data", a personal data subject who has consented to the dissemination of his personal data has the right to apply with a demand to stop the transfer (dissemination, provision, access) of his personal data. To do this, it is necessary to fill out the appropriate form of the personal data subject's request to stop the dissemination of his personal data (Appendix 9) and hand it over in person to the employees of LLC Sladeia accepting citizens' requests, or by mail.

6.13. Upon achieving the goals of personal data processing, as well as in the event of the personal data subject's withdrawal of consent to their processing, personal data are subject to destruction, in accordance with the requirements for confirmation of personal data destruction approved by Order of Roskomnadzor dated 28.10.2022 No. 179, if:

6.13. 1. Not otherwise provided by the agreement to which the personal data subject is a party, beneficiary or guarantor;

6.13.2. Unless otherwise provided by another agreement between LLC Sladeia and the personal data subject.

6.14. Upon receipt of a request from the personal data subject or his/her representative, as well as the authorized body for the protection of the rights of personal data subjects, to eliminate violations of the law committed during the processing of personal data, to clarify, block and destroy personal data, LLC Sladeia shall take appropriate measures and notify of the measures taken within the timeframes in accordance with the requirements of Article 21 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data".

6.15. In contractual relations with the personal data subject, the agreement shall not contain provisions allowing inaction of the personal data subject as a condition for concluding the agreement.

VII. REQUIREMENTS TO PROTECT PERSONAL DATA

7.1. LLC Sladeia takes the necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data.

7.2. LLC Sladeia has determined the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" and regulatory legal acts adopted in accordance with it.

7.3. LLC Sladeia has appointed a person responsible for organizing the processing of personal data.

7.4. LLC Sladeia carries out internal control and (or) audit of compliance of personal data processing with the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data" and regulatory legal acts adopted in accordance with it, requirements for the protection of personal data, the policy of LLC Sladeia regarding the processing of personal data, local acts of LLC Sladeia.

7.5. For each personal data information system, an assessment of the harm that may be caused to personal data subjects in the event of a violation of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data" has been made, the ratio of the said harm and the measures taken by LLC Sladeia.

7.6. Employees of LLC Sladeia directly involved in the processing of personal data are familiar with the provisions of the legislation of the Russian Federation on personal data, including the requirements for the protection of personal data, documents defining the policy of LLC Sladeia with respect to the processing of personal data, and local acts on the processing of personal data.

7.7. LLC Sladeia has taken the necessary legal, organizational, and technical measures when processing personal data and implemented the requirements for the protection of personal data:

7.7.1. threats to the security of personal data when processing them in personal data information systems have been identified;

7.7.2. organizational and technical measures are applied to ensure the security of personal data when processing them in personal data information systems that are necessary to meet the requirements for the protection of personal data, the implementation of which ensures the levels of protection of personal data established by the Government of the Russian Federation;

7.7.3. information security tools that have undergone the conformity assessment procedure in the established manner are applied;

7.7.4. the effectiveness of the measures taken to ensure the security of personal data is assessed before putting the personal data information system into operation;

7.7.5. machine-readable media of personal data are recorded;

7.7.6. unauthorized access to personal data is detected and measures are taken;

7.7.7. personal data is restored that has been modified or destroyed as a result of unauthorized access to it;

7.7.8. rules for access to personal data processed in the personal data information system are established, and registration and recording of all actions performed with personal data in the personal data information system are ensured;

7.7.9. control over measures taken to ensure the security of personal data and the level of protection of personal data information systems.

VIII. TERMS OF PROCESSING PERSONAL DATA BY THE PUBLIC PERSONS, AUTHORIZED BY THE PERSONAL DATA SUBJECT FOR DISTRIBUTION

8.1. The personal data of the personal data subject shall be distributed with the consent of the personal data subject, executed in accordance with the requirements of Art. 10.1 of the Federal Law of 27.07.2006 N 152-FZ "On Personal Data" and the order of the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor) dated 24.02.2021 N 18 "On approval of the requirements for the content of consent to the processing of personal data authorized by the personal data subject for distribution", except for cases stipulated by the legislation of the Russian Federation for the implementation and performance of the duties imposed by the legislation of the Russian Federation on LLC Sladeia.

8.2. For personal data distributed by LLC Sladeia on the organization's information resources, the subjects of personal data have not established prohibitions and conditions for their processing by an unlimited number of persons.

8.3. Visitors to the information resources of LLC Sladeia, on which LLC Sladeia distributes personal data of subjects with their consent, have the right to process the distributed personal data of subjects in compliance with the requirements of the Federal Law of July 27, 2006 N 152-FZ "On Personal Data".

IX. FINAL PROVISIONS

9.1. This Policy is an internal document of LLC Sladeia, publicly available and subject to posting on the official website of LLC Sladeia.

9.2. This Policy is subject to change, supplementation in the event of the emergence of new legislative acts and special regulatory documents on the processing and protection of personal data, but not less than once every three years.

9.3. Control over compliance with the requirements of this Policy is carried out by the person responsible for organizing the processing of personal data in LLC Sladeia.

9.4. The liability of officials of LLC Sladeia who have access to personal data for failure to comply with the requirements of the rules governing the processing and protection of personal data is determined in accordance with the legislation of the Russian Federation and the internal documents of LLC Sladeia.