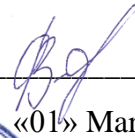


**APPROVED**

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«01» March 2017



**COMPANY POLICY OF PERSONAL DATA PROCESSING**

Moscow, 2017

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## 1 GENERAL PROVISIONS

The policy for the processing of personal data (from now on referred to as the Policy) is developed under the Federal Law of 07.27.2006. No. 152-FL “About Personal Data” (from now on - FL-152).

This Policy defines the procedure for personal data processing and measures to ensure the security of personal data in SQA Lab LLC (from now on referred to as the Operator) to protect the rights and freedoms of persons and citizens when processing their personal data, including protecting the rights to privacy, personal and family secrets.

The following basic concepts are used in the Policy:

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

**blocking of personal data** - temporary termination the processing of personal data (unless the processing is necessary to clarify personal data);

**information system of personal data** - a set of personal data contained in databases, and information technologies and technical means ensuring their processing;

**depersonalisation of personal data** - actions, as a result of which it is impossible to determine the belonging of personal data to a specific subject of personal data without the use of additional information;

**personal data processing** - any action (operation) or a set of actions (operations) performed with personal data using automation tools or without them, including collection, recording, systematisation, accumulation, storage, clarification (updating, changing), retrieval, use, transfer (distribution, provision, access), depersonalisation, blocking, deletion, elimination of personal data;

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

**personal data** - any information relating directly or indirectly to a specific or a determinable individual person (the subject of personal data);

**provision of personal data** - actions aimed at the disclosure of personal data to a specific person or a certain circle of persons;

**distribution of personal data** - actions aimed at disclosing personal data to an undefined number of persons (transfer of personal data) or familiarising with personal data of an unlimited number of persons, including disclosing personal data in the media, posting on information and telecommunication networks or providing access to personal data in any other way;

**cross-border transfer of personal data** - the transfer of personal data to the territory of a foreign state to foreign state authority, to a foreign individual or foreign legal person;

**elimination of personal data** - actions, as a result of which it is impossible to restore the content of personal data in the personal data information system and (or) as a result of which material carriers of personal data are destroyed.

The company is obliged to publish or otherwise provide unlimited access to this Policy of Personal Data Processing under Part 2 of Art. 18.1. FL-152.

## **2 PRINCIPLES AND TERMS OF PERSONAL DATA PROCESSING**

### **2.1 Principles of Personal Data Processing**

The processing of personal data by the Operator is based on the following principles:

- legality and equitable basis;
- restrictions on the processing of personal data by achieving specific, predetermined and legitimate purposes;
- preventing the processing of personal data that is incompatible with the purposes of their collecting;
- prevention of combining the databases containing personal data, the processing of which is performed for purposes incompatible with each other;
- processing only those personal data that meet the purposes of their processing;
- compliance of the content and volume of processed personal data with the stated purposes of their processing;
- preventing the processing of excessive personal data concerning the stated purposes of their processing;
- ensuring the accuracy, sufficiency and relevance of personal data concerning the stated purposes of their processing;
- elimination or depersonalisation of personal data upon the achievement of the purposes of its processing or in case of loss of necessity to achieve these purposes, if it is impossible to eliminate the committed violations of personal data by the Operator, unless otherwise provided by Federal Law.

### **2.2 Terms of Personal Data Processing**

The operator processes personal data upon availability at least one of the following conditions:

- processing of personal data is performed according to a consent of the subject of personal data;
- processing of personal data is necessary to achieve the purposes stipulated by the international treaty of the Russian Federation or by the law to fulfil the functions, powers and obligations assigned to the operator by the legislation of the Russian Federation;

- processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another authority body or official body, subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;
- processing of personal data is necessary for the execution of an agreement where the subject of personal labour is a Party of this agreement or a beneficiary, or a guarantor, as well as for the conclusion of an agreement on the initiative of the subject of personal data or an agreement under which the subject of personal data will be the beneficiary or the guarantor;
- processing of personal data is necessary for realisation the rights and legitimate interests of the Operator or third parties, or to achieve socially significant goals, under the condition that it does not violate the rights and freedoms of the subject of personal data;
- processing of personal data is performed if the access to an unlimited number of persons is provided by the labour of personal data or by his/her request (from now on referred to as publicly available personal data);
- the processing of personal data is performed as a subject to publication or mandatory disclosure by Federal law.

### **2.3 Confidentiality of Personal Data**

The operator and other persons who have gained access to personal data are required not to disclose to third parties and not to distribute personal data without the consent of the subject of personal data, unless otherwise provided by Federal Law.

### **2.4 Public Sources of Personal Data**

For the purposes of information support, the Operator may create publicly accessible sources of personal data of entities, including directories and address books. With the written consent of the subject, public sources of personal data may include his/her surname, first name, middle name, date and place of birth, position, contact phone numbers, email address and other personal data provided by the subject of personal data.

Information about the subject should be excluded from public sources of personal data at any time by request of the subject or by a decision of the court or other authorised state bodies.

### **2.5 Special Categories of Personal Data**

Processing of special categories of personal data by the Operator relating to race, nationality, political views, religious or philosophical beliefs, health status, intimate life is allowed in cases if:

- the subject of personal data agreed in writing form to the processing of his/her personal data;
- personal data is made publicly available by the subject of personal data;
- processing of personal data is performed by the legislation on state social assistance, labour legislation, the legislation of the Russian Federation on pensions for state pensions, and labour pensions;

- processing of personal data is necessary to protect the life, health or other vital interests of the subject of personal data or the life, health or other vital interests of others, and obtaining the consent of the subject of personal data is impossible;
- the processing of personal data is performed for medical and preventive purposes, to establish a medical diagnosis, provide medical and medical social services, under condition that the processing of personal data is performed by a person who is professionally engaged in the activities and is obliged to keep medical confidentiality by the legislation of the Russian Federation;
- the processing of personal data is necessary to establish or realisation the rights of the subject of personal data or third parties, as well as in connection with the administration of justice;
- the processing of personal data is performed by the legislation on compulsory types of insurance, with insurance legislation.

The processing of special categories of personal data should be stopped immediately if the reasons due to which they were processed are eliminated, unless otherwise provided by Federal law.

Processing of personal data on a criminal record may be performed by the Operator exclusively in cases and in the manner that are determined by Federal laws.

## **2.6 Biometric Personal Data**

Information that characterises the physiological and biological characteristics of a person, based on which it is possible to establish his/her personality - biometric personal data - can be processed by the Operator with the consent of the subject in writing form only.

## **2.7 Authorising Other Person for Processing Personal Data**

The operator has the right to entrust the processing of personal data to another person with the consent of the subject of personal data, unless otherwise provided by Federal Law, based on an agreement concluded with this person. A person who processes personal data on behalf of the Operator is required to comply with the principles and rules for the processing of personal data according to FL-152.

## **2.8 Cross-border Transfer of Personal Data**

The operator is obliged to make sure that the foreign state into whose territory it is supposed to transfer personal data provides adequate protection of the rights of the subjects of personal data before such a transfer begins.

Cross-border transfer of personal data on the territory of foreign states that do not provide adequate protection of the rights of subjects of personal data may be performed in cases:

- the written consent of the subject of personal data on the cross-border transfer of his/her personal data;
- execution of an agreement to which the subject of personal data is a Party.

## **3 PERSONAL DATA SUBJECT RIGHTS**

### **3.1 Consent of the Subject of Personal Data**

The subject of personal data decides to provide his/her personal data and agrees to its processing freely, by his/her will and in his/her interest. Consent to the processing of personal data may be given by the subject of personal data or his/her representative in any form allowing confirming the fact of its receipt, unless otherwise provided by Federal Law.

The obligation to provide the evidence of getting the consent of the subject of personal data to the processing of his/her personal data or proof of the existence the grounds specified in FL-152 is the responsibility of the Operator.

### **3.2 Personal Data Subject Rights**

The subject of personal data has the right to receive information from the Operator regarding the processing of his/her personal data if such a right is not limited by Federal Laws. The subject of personal data has the right to require from the Operator to clarify his/her personal data, block it or eliminate it if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated processing purpose, and also take measures prescribed by law to protect his/her rights.

The processing of personal data to promote goods, works, services on the market through direct contacts with a potential consumer using communication means, as well as for political campaigning, is allowed only with the prior consent of the subject of personal data. The specified processing of personal data is recognised as being performed without the prior consent of the subject of personal data, unless the Company proves that such consent was obtained.

The operator is obliged to stop immediately processing of his/her personal data for the above purposes by request of the subject of personal data.

It is forbidden to make decisions on the basis of exclusively automated processing of personal data that give rise to legal consequences in relation to the subject of personal data or otherwise affect his/her rights and legitimate interests, unless the cases provided for by Federal Laws, or if there is a written consent of the subject of personal data.

If the subject of personal data considers that the Operator is processing his/her personal data in violation of the requirements of FL-152 or otherwise violates his/her rights and freedoms, the subject of personal data has the right to appeal the actions or omissions of the Operator to the Authorized Body for the protection the rights or in a court .

The subject of personal data has the right to protect his/her rights and legitimate interests, including compensation for losses and (or) compensation for non-pecuniary damage in court.

#### **4 PERSONAL DATA SECURITY**

The security of personal data processed by the Operator is ensured by the implementation of legal, organisational and technical measures necessary to ensure the requirements of Federal legislation in the field of personal data protection.

To prevent unauthorised access to personal data, the following organisational and technical measures are applied by the Operator:

- assignment of officials responsible for organising the processing and protection of personal data;
- limitation the group of persons having access to personal data;
- familiarisation of subjects with the requirements of Federal legislation and regulatory documents of the Operator for the processing and protection of personal data;
- organisation of accounting, storage and circulation of information carriers;
- identification of the security threats of personal data during their processing, the formation of threat models on their basis;
- development of a personal data protection system based on the threat model;
- verification of the readiness and effectiveness of the use of information security tools;
- differentiation of user access to information resources and firmware for information processing;
- registration and accounting the actions of users of information systems of personal data;
- using antivirus and recovery tools for the protection of personal data;
- using, if necessary, firewalls, intrusion detection, security analysis and cryptographic information protection tools;
- organisation of access control to the Operator's territory, under security of premises with technical means for processing personal data.

#### **5 FINAL PROVISIONS**

Other rights and obligations of the Operator as the operator of personal data are determined by the legislation of the Russian Federation in the field of personal data.

The Operator's officials, guilty in violating the rules governing the processing and protection of personal data, bear material, disciplinary, administrative, civil or criminal liability in the manner prescribed by Federal Laws.