

SISW LLC policy on personal data processing and protection

1. General provisions

The present document defines SISW LLC policy on processing and protection of personal data of people with employment, contract or other civil law relations with SISW LLC, according to legal requirements and requirements under other regulatory acts of the Russian Federation regarding personal data, in particular Federal Law as of 27.07.2006 No. 152-FZ On personal data.

SISW LLC processes personal data according to:

- consent of the subject to personal data processing;
- local acts of SISW LLC concerning personal data processing;
- SISW LLC Charter;
- labor and civil contracts, signed by SISW LLC;
- Labor Code of the RF as of 30.12.2001 No. 197-FZ;
- Tax Code of the RF as of 31.07.1998 No. 146-FZ (part one), as of 05.08.2000 No. 117-FZ (part two);
- Civil Code of the RF as of 30.11.1994 No. 51-FZ (part one), as of 26.01.1996 No. 14-FZ (part two);
- Federal law as of 15.12.2001 No. 167-FZ On mandatory pension insurance;
- Federal law as of 21.11.2011 No. 323-FZ On fundamental healthcare principles in the Russian Federation;
- Federal law as of 01.04.1996 No. 27-FZ On individual (personalized) record-keeping in the compulsory pension insurance system;
- Decree of the State committee of the RF for statistics as of 05.01.2004 No. 1 On approval of the unified form of initial employment and salary record documentation;
- Federal law as of 01.04.1996 No. 27-FZ On individual (personalized) record-keeping in the compulsory pension insurance system;
- Federal law as of 25.12.2008 No. 273-FZ On combating corruption;
- Federal law as of 07.08.2001 No. 115-FZ On counteraction of the legitimization (laundering) of the proceeds of crime and the financing of terrorism;
- and other statutory acts, containing SISW LLC obligation to process personal data.

The Policy shall apply to all personal data (subjects), which can be obtained by SISW LLC during its activity.

2. Main terms and definitions

The following main terms and definitions shall be used in the present Policy:

- personal data – any information, related to a natural person (personal data subject), which is defined or can be defined directly or indirectly;
- operator – state, municipal body, legal entity or natural person, which organizes and (or) processes personal data independently or together with other persons and determines the purposes of personal data processing, content of personal data, subject to processing, actions (operations), performed with personal data;
- personal data processing – any action (operation) or set of actions (operations), performed under application or without application of automation means in relation to personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deleting, destruction of personal data;
- automated personal data processing – personal data processing with computing tools;
- personal data distribution – actions, aimed at disclosure of personal data to an indefinite number of people;
- personal data provision – actions, aimed at disclosure of personal data to a definite person or definite number of people;
- personal data blocking – temporary termination of personal data processing (excluding cases, when processing is required for personal data clarification);

- personal data destruction – actions, which make it impossible to recover personal data content in the personal data information system and (or) which result in destruction of material personal data carriers;
- personal data depersonalization – actions, which make it impossible without additional information to determine that personal data relates to a certain personal data subject;
- personal data information system – total set of personal data in data bases and information technologies and technical means ensuring its processing;
- cross-border personal data transfer – personal data transfer to the territory of a foreign state to governmental body of a foreign state, foreign natural person or legal entity.

3. Principles, purposes and conditions for personal data processing at SISW LLC

SISW LLC is a personal data operator and processes personal data of SISW LLC employees and other personal data subjects, which have no labor relations with SISW LLC.

Personal data of subjects is processed at SISW LLC according to the following principles:

- personal data is processed at SISW LLC on legal and fair basis;
- personal data processing is limited to achievement of certain and legal goals, set in advance;
- personal data processing, not compliant with the purposes of personal data collection, shall be prohibited;
- it is prohibited to combine data bases with personal data, which is processed for incompatible purposes;
- only personal data, compliant with its processing purposes, can be processed;
- content and scope of processed personal data complies with the declared processing purposes. It is prohibited to process excessive personal data, compared to the declared processing purposes;
- personal data accuracy, its sufficiency and if required relevance compared to the purposes of personal data processing shall be ensured during personal data processing. SISW LLC shall undertake all required actions or shall ensure these actions to delete or clarify incomplete or inexact personal data;
- personal data shall be stored in a form which allows to determine personal data subject, if the term for personal data archiving is not set under the federal law, contract, the personal data subject is a party, beneficiary or surety to;
- processed personal data shall be destroyed or depersonalized upon achievement of processing purposes or if there is no further necessity to achieve these purposes, unless otherwise stipulated under the laws of the Russian Federation.

Personal data is processed at SISW LLC:

- to ensure compliance with laws and other statutory legal acts, including without limitation to perform SISW LLC obligations against state and governmental and to interact with them;
- to assist SISW LLC employees and candidates in employment, education and promotion;
- to ensure personal security of SISW LLC employees;
- to control amount and quality of performed work;
- to ensure safety of SISW LLC property and resources;
- to enable employment at SISW LLC for a certain position as well as to form SISW LLC labor pool;
- to prepare, sign, perform and terminate agreements with contractors (business partners, suppliers and others third parties), as well as to perform their compliance check;
- to ensure access control and internal security policy at SISW LLC sites;
- to issue private medical insurance policy;
- to assist in visa processing.

SISW LLC processes personal data via collection, recording, systematization, accumulation, storage, clarification, extraction, use, transfer, depersonalization, blocking, deletion, destruction, both under application of personal data information system and without application of automation means.

The personal data subject directly is the information source for all personal data. If it is possible to obtain personal data only from a third party, the personal data subject must be notified about it in writing in advance and he must provide his written consent, unless otherwise stipulated under the laws of the RF on personal data. SISW LLC shall

inform the personal data subject about purposes, assumed sources and ways of obtaining personal data, as well as about the nature of personal data to be obtained and consequences of the personal data subject refusal to provide written consent to their obtaining.

SISW LLC shall not disclose personal data to third parties and shall not distribute it without the personal data subject's consent, unless otherwise stipulated by the federal law.

SISW LLC is entitled to transfer personal data to interrogation and investigation authorities, other authorized bodies on grounds according to current laws of the Russian Federation.

SISW LLC shall be entitled to assign personal data processing to another person upon the personal data subject's consent under a contract, signed with this person. The contract must contain a list of actions (operations) with personal data, which will be performed by the person, processing personal data, processing purposes, obligations of such person to ensure confidentiality of personal data and safety of personal data during its processing, as well as the requirement on protection of processed personal data, according to Art. 19 of the Federal Law On personal data.

SISW LLC executes cross-border transfer of personal data to the territory of foreign states, according to requirements of Art. 12 of the Federal Law as of 27.07.2006 No. 152-FZ On personal data

Access to personal data processed at SISW LLC is granted only to SISW LLC employees who have such responsibility, according to their professional (labor) functions.

Storage of personal data is performed in the form allowing to define the subject of personal data not longer than it is demanded by the purposes of their processing and the requirement of the statutory documents of the Russian Federation connected with document storage, then data can be destroyed or depersonalized (if necessary).

4. The list of subjects, whose personal data is processed at SISW LLC

Personal data of the following personal data subject categories is processed at SISW LLC:

- **Employees:** employees, who have labor relations with SISW LLC;
- **Contractors:** natural persons, who perform works or provide services to SISW LLC on the basis of civil contracts;
- **Candidates:** applicants for vacant positions at SISW LLC (candidates) and persons, who had labor relations with SISW LLC earlier;
- **Relatives of employees:** natural persons being close relatives of employees;
- **Partners:** natural persons, who are employees or representatives of partners – legal entities and individual entrepreneurs (suppliers, customers, and so on), which have civil contracts with SISW LLC,
- **Potential partners:** natural persons, who are employees or representatives of legal entities and individual entrepreneurs (potential suppliers, customers, and so on) at the pre-contractual stage with SISW LLC (at the stage of actions for the purposes of signing a contract).

4.1. List of personal data, processed at SISW LLC

Employees: family name, name, patronymic, gender, date and place of birth, registration and actual address, citizenship, data of the main ID document, foreign passport data, family status, children, information on education, additional education, including professional advanced training and retraining, knowledge of foreign languages, personal telephone number and e-mail address, information on signing/termination of an employment contract, employment conditions and professional duties, information from the labor record book, any documents from personal file and any statements regarding labor relations; information about previous professional experience and employment, including CV and recommendation letters, information on years in service; data on the photographic image; INN; SNILS, identification data within the employer's organization, results of medical check regarding suitability to perform employment duties; special certificates and licenses, required to perform employment duties (for example driving license); data on the photographic image from the ID document and foreign passport; information on salary, accrued insurance contributions, compensations, benefits and other payments; information on bank account, bank card, including personal bank cards, issued by SISW LLC; information on military registration;

work evaluation forms, comments, management notes and other information under the PMP process; immigration card information, work permits and patent data (only for foreign citizens, employed at SISW LLC); visa data; information on time at work, temporary incapacity to labor, business trips and vacation; copies of documents required to confirm the right for additional vacation and compensations/benefits; information from work files, documents, e-mail and other messages in digital or any other form regarding SISW LLC business activity as well as incoming, sent or available with the employee in connection with his/her professional activity, which can contain personal data; information on using SISW LLC resources, such as computer, telephone and other devices, in particular, Internet and Intranet network – for the purposes of compliance with laws and statutory requirements, assistance by employment, training and promotion, ensuring individual security of the Subject, quality control of the performed work, as well as ensuring safety of SISW LLC property.

Contractors: family name, name, patronymic, date and place of birth, registration and actual address, gender, citizenship, data of the main ID document, INN; SNILS, identification data assigned or provided by the operator (GID number, employee ID, e-mail address, information on work place, telephone numbers), information on the photographic image, personal telephone number and e-mail address, data on the photographic image from the ID document, information on payments, accrued insurance contributions, special certificates and licenses, required to perform works under the contract (for example driving license), information on bank account, bank card, immigration card information, work permits and visa data; information from work files, documents, e-mail and other messages in digital or any other form regarding SISW LLC business activity as well as incoming, sent or available with the subject in connection with performance of works under the contract, which can contain personal data; information on using SISW LLC resources, such as computer, telephone and other devices, in particular, Internet and Intranet network - for the purposes of compliance with laws and statutory requirements, assistance by employment, training and promotion, ensuring individual security of the Subject, quality control of the performed work, as well as ensuring safety of SISW LLC property.

Candidates: personal data, independently specified by the subject in his/her CV – for the purposes of potential employment at SISW LLC for a certain position, as well as for the purposes of establishing the candidates pool at SISW LLC and consideration of the subject for other open or future positions.

Relatives of employees: family name, name, patronymic, date of birth, gender, data of the main ID document, actual address, telephone number, degree of relationship to SISW employee, foreign passport number – for issuing a private medical insurance policy via transferring the data to the insurance company as well as for further settlements with SISW employee according to SISW LLC Guideline on the social benefits package.

Potential partners: family name, name, patronymic, date of birth, e-mail address, position in the company, information on whether he/she is a governmental official/is related to a governmental official, education, years in service, current/previous place of works, availability and nature of interactions with SISW employees, information on former work at SISW (term of work at SISW, position at SISW) – for the purpose of their compliance check.

All categories of subjects of personal data (for the purposes of support in execution of visas: family name, name, patronymic, date and place of birth, registration and actual address, data of the main ID document, family status, gender, citizenship, foreign passport data, data on the photographic image, salary and position data, information on the employer (name, address, telephone), personal telephone numbers – for the purposes of visa issue via further transfer to the visa center as well as for internal recording of provided services on visas support.

Partners: family name, name, patronymic, data of the main ID document, telephone number and e-mail address – for the purposes of signing and performance of the contract.

The additional data relating to personal data and processed by SISW LLC can be established by local acts of SISW LLC for separate special cases. Content and volume of the processed personal data shall comply with the intended purposes of such data processing. The processed personal data shall not be irrelevant to the declared purposes of their processing.

SISW LLC does not process special and biometric personal data.

5. Rights of personal data subjects

According to current laws, personal data subjects are entitled to receive information related to their personal data processing, including:

- confirmation of the fact of personal data processing by SISW LLC;
- legal basis and purposes of personal data processing;
- purposes and ways of personal data processing applicable at SISW LLC;
- name and location of SISW LLC, information about persons (except the employees of SISW LLC) which have access to personal data or by which personal data on the basis of the contract with the operator or on the basis of the federal law can be opened;
- the processed personal data relating to an appropriate subject of personal data, a source of their receiving if other order of submission of such data is not provided by the federal law;
- personal data processing terms, including archiving terms;
- the procedure of implementation by personal data subjects the rights provided by the Federal Law as of 27.07.2006 No. 152-FZ On personal data;
- information about carried out or about alleged cross-border transfer of personal data;
- the name or the surname, the name, the middle name and the address of the person which is carrying out personal data processing at the request of the operator if processing is charged or it will be charged to such person;
- other information, provided for under the Federal Law as of 27.07.2006 No. 152-FZ On personal data or other federal laws.

The personal data subject is entitled to withdraw his/her consent for personal data processing, however SISW LLC is entitled to proceed with personal data processing without consent for personal data processing in case of reasons, specified in the Federal Law as of 27.07.2006 No. 152-FZ On personal data.

In order to exercise the specified rights the personal data subject must send a written request to SISW LLC.

The personal data subject is entitled to appeal against SISW LLC actions or omissions to authorized bodies for protection of personal data subjects' rights or by legal means.

Personal data subject can also carry out other rights provided by the Federal law of 27.07.2006 No. 152-FZ On personal data or other federal laws.

6. Ensuring personal data protection

According to part 1 Art. 18.1 of the Federal Law as of 27.07.2006 No. 152-FZ On personal data and unless otherwise is provided for under the Law or other federal laws, SISW LLC shall independently define the content and the list of actions, required and sufficient to ensure performance of obligations, according to laws on personal data. In particular personal data protection means include:

- in cases, provided for under the law, personal data is received and processed by SISW LLC upon written consent of personal data subject;
- appointment of a person, responsible for organization of personal data processing at SISW LLC;
- appointment of a person, responsible for information security at SISW LLC;
- implementation of access system to information resources, information system and SISW LLC documents, related to its use, as well as documents of the subject, he/she provided to SISW LLC;
- limited access to premises, containing technical means, which allow personal data processing;
- antivirus control, prevention of corporate network penetration by malicious software (virus programs) and software bugs;
- backing of SISW LLC technical means, duplication of information, use by SISW LLC of protected communication channels, location of servers and communication means in lockable SISW LLC premises with access control measures;

- storage of personal data tangible carriers, according to terms and conditions, which ensure their protection and exclude unauthorized access;
- ensuring an opportunity for SISW LLC to recover data, changed and destroyed as a result of unauthorized access, to perform regular checks of personal data recovery procedures;
- performance of actions, aimed at prevention of unauthorized access to personal data and (or) its transfer to persons with no right to access such information;
- constant control of personal data protection level;
- prohibition to transfer personal data via open communication channels, computer networks beyond the controlled area and via internet network without application of personal data protections means, set at SISW LLC (excluding personal data in public access and (or) depersonalized personal data);

7. Liability for violation of provisions on personal data processing

Persons, guilty of violation of provisions of the laws of the RF on personal data during personal data processing shall be held disciplinary and financially liable according to the order under the Labor Code of the RF and other federal laws, as well as they will be held administratively, civilly or criminally liable according to the order under federal laws.

8. Final provisions

The present policy shall be published in the digital form at SISW LLC official web-site
https://www.plm.automation.siemens.com/ru/about_us/index.shtml.

The Policy shall be revised at least once in five years and in case of changes to the laws on personal data.

All questions regarding the present Policy can be sent to e-mail or post address:

- E-mail – dp.ru@siemens.com;
- Post address – 115184, Moscow, Bolshaya Tatarskaya str. 9.