

**POLICY  
of Irida, LLC  
regarding personal data processing**

- **General Terms**

- The personal data processing policy determines major purposes, principles and security requirements of personal data at Irida, LLC.
- The Policy is developed to protect rights and freedoms of a personal data owner when processing their personal data.
- The Policy is compulsory for all employees of Irida, LLC, who have access to personal data and process them.

- **General Terms Used in the Policy**

*Personal data* is any information directly or indirectly relating to a definite or defined individual (personal data owner);

*Personal Data Processor (Processor)* is a state body, municipal body, legal entity or an individual that arranges or performs personal data processing independently or with another entity, that defines purposes of personal data processing, their content to be processed, actions (operations) applied to personal data;

*Personal Data Owner* is an individual that is defined directly or indirectly through their personal data.

*Personal Data Processing* is any action (operation) or a range of actions (operations) with personal data performed with or without automation facilities, including collection, recording, arrangement, accumulation, storage, updating (amendments), retrieval, usage, transfer (distribution, provision, access), anonymization, blocking, deleting, extermination of personal data;

*Personal Data Automated Processing* is personal data processing involving computing devices;

*Distribution of Personal Data* is an action aiming at revelation of personal data to the public.

*Provision of Personal Data* is an action aiming at revelation of personal data to a certain person or a group of people;

*Personal Data Blocking* is a temporary cessation of personal data processing (except cases, when processing is required for personal data update);

*Personal Data Extermination* is an action resulting in an impossibility to restore the content of personal data in the database or in extermination of a physical media of personal data;

*Personal Data Anonymization* is an action resulting in an impossibility to use additional information and define the specific owner of the personal data;

*Personal Data Information System* is a range personal data in data bases; the system includes informational technologies and technical means providing personal data processing;

*Trans-Border Transfer of Personal Data* is a transfer of personal data to the territory of a foreign state, to a governmental authority of a foreign state, a foreign individual or company;

- **Purposes of Personal Data Collection and Processing**

- Irida, LLC, collects and processes personal data in order to:
  - perform any type of business according to the Charter of Irida, LLC.
  - conclude, fulfil, terminate any contracts when performing business activity including searching and engaging potential agents (clients) for concluding a contracts (contracts).
  - provide work of HR, comply with Labour Code requirements,
  - do accounting and tax registration, form, issue and duly submit accountancy, taxation and statistics records,
  - perform administrative business activities,
  - perform or fulfil functions, obligations and duties born by Irida, LLC, according to the legislation of the Russian Federation,
  - on any other legal purpose.

- **Legal Framework for Personal Data Processing**

- Personal Data Processing is performed according to the following federal laws, legal documents, local regulatory documents and other provisions:
  - The Constitution of the Russian Federation;
  - The Labour Code of the Russian Federation;
  - The Civil Code of the Russian Federation;
  - other legal documents of the Russian Federation and legal documents of authorized governmental bodies;
  - The Provision On Personal Data Processing at Irida, LLC;
  - The Charter of Irida, LLC;
  - Contracts, concluded between Irida, LLC, and including partners outside the Russian Federation;
  - Agreement for Personal Data Processing.

- **Scope and Categories of Processed Personal Data, Categories of Personal Data Owners**

- Personal Data of the following Owners are to be processed:
  - employees of Irida, LLC, employees' relatives, former employees;
  - clients and partners of Irida, LLC, (individuals);
  - Representatives/employees of clients and partners of Irida, LLC, (companies);
  - other Personal Data Owners (to fulfil processing purposes stated in Section 3 of the Policy).

5.2. The content and scope of the personal data processed by Irida, LLC, is defined in compliance with the legislation of the Russian Federation and local legal documents of Irida, LLC, regarding the personal data processing purposes stated in Section 3 of the Policy.

5.3. Personal data of special categories concerning the race, political views, religious and philosophical issues, private life are not processed by Irida, LLC.

5.4. Irida, LLC, processes biometric personal data (photos) of current employees of Irida, LLC, and former employees of Irida, LLC, according to the requirements of the current legislation.

- **Procedure and Conditions of Personal Data Processing**

- Conditions of Personal Data Processing at Irida, LLC:
  - personal data are processed upon the consent of the Personal Data Owner to have their personal data processed, unless otherwise is stipulated by the legislation of the Russian Federation,
  - personal data are required to fulfil a contract with the personal data owner as a party of the contract.
  - Irida, LLC, does not reveal the owner's personal data to a third party and does not distribute personal data, unless otherwise is stipulated by the legislation of the Russian Federation,
  - Irida, LLC, is enabled to have personal data processed by a third party upon the personal data owner's consent and a contract concluded with the party.

6.2. When processing personal data Irida, LLC, performs the following operations over the personal data:

- collection, recording, arrangement, accumulation, storage, updating (amendments), retrieval, usage, transfer (distribution, provision, access), anonymization, blocking, deleting, extermination of personal data.

6.3. Personal data are processed in the following ways:

- non-automated personal data processing.

6.4. Irida, LLC, is allowed to perform transborder transfer of personal data in order to fulfil a contract according to the procedure agreed upon by Irida, LLC, and a foreign partner.

6.5. Irida, LLC, takes all necessary and sufficient measure to provide fulfilment of obligations in compliance with the Federal Law dated 27/07/2006 No.125-FZ On Personal Data, the Provision of the Government dated 15/09/2008 No. 687 On Approval of Provision on Peculiarities of Personal Data Processing Performed without Computing Means, Provision of the Government dated 01/11/2012 No. 1119 On Approval of Requirements to Security of Personal Data during Processing in Personal Data Information Systems, Order of the Federal Service for Technical and Export Control dated 18/02/2013 No. 21 On Approval of Content and Structure of Administrative and technical Measures Providing Security of Personal Data during Processing in Personal Data Information Systems, and legal document adopted in regards thereto.

6.6. Documents with personal data area stored in the archive of Irida, LLC, or in the archive of the company a contract on document storage is concluded with. Documents with personal data of personal data owners are stored within the storage period stipulated in the associated legal documents. When the storage period expires, the documents are to be exterminated.

6.7. Personal data of personal data owners are kept in Personal Data Processing Information Systems in the territory of the Russian Federation.

## **7. Updating, Amending, Deleting and Exterminating of Personal Data, Responding to Enquires of Owners for Access to Personal Data**

- If in fact there is a misleading information in the personal data, Irida, LLC, is to update the personal data or have them updated within seven business days as from the moment of provision of such data in compliance with the information provided by the personal data owner, the owner's representative or an authorized body for personal data owners' rights protection, or with other associated legal documents.

- Personal data are no longer processed by Irida, LLC, if:
  - purposes of personal data processing are reached,
  - personal data processing consent expires,
  - the personal data owner withdraws the personal data processing consent,

- personal data processing is illegally.

- If purposes of personal data processing are reached, Irida, LLC, is to cease this processing or have it ceased and exterminate the personal data within the period under 30 days as from the moment of reach of personal data processing purposes, unless otherwise is stated in a contract with the personal data owner as the beneficiary or the principal, or in another agreement between Irida, LLC, and the personal data owner; if the processor is not entitled to process personal data without the personal data owner's consent the case is subject to the Federal Laws.

- If the owner withdraws the personal data processing content, Irida, LLC, is to cease this processing or have it ceased and, if personal data storage is no longer required for personal data processing purposes, exterminate the personal data within the period under 30 days as from the moment of the withdrawal submission unless otherwise is stated in a contract with the personal data owner as the beneficiary or the principal, or in another agreement between the processor and the personal data owner; if the processor is not entitled to process personal data without the personal data owner's consent the case is subject to the Federal Laws.

- If personal data are processed illegally, Irida, LLC, is to cease the personal data processing or have the personal data processing ceased within the term under three business days as from the moment of this processing proven illegal. If it is impossible to make personal data processing legal, Irida, LLC, is to exterminate the personal data or to have them exterminated within the period under ten business days as from the moment of this processing proven illegal.

- If it is impossible to exterminate the personal data within the period stated in cl. 7.3-7.5 of the Policy, Irida, LLC, is to block these personal data and provide the extermination of these personal data within the period under six months, unless another term is stated in the federal laws.

- The personal data owner has the right to receive the information concerning their personal data processing.

- The list of data the personal data owner has the right to enquire is given in cl. 8.1. of the Policy. The stated information is submitted if the personal data owner or the owner's representative applies to the processor or makes an enquiry. The enquiry should contain the number of the personality identification document of the personal data owner or the owner's representative, its date of issue and issuing authority, references, that confirm relations of the personal data owner and Irida, LLC, (contract number and date), or other information that confirms that Irida, LLC has been processing the personal data; the enquiry should also contain a signature of the personal data owner or the owner's representative.

- **Rights of Personal Data Owners**

8.1. The personal data owner has the right to receive the information concerning their personal data processing, cl. 7 of Article 14 of the Federal Law On Personal Data entitles the owner to receive:

- 1) confirmation of actual personal data processing;
- 2) legal framework and purposes of personal data processing;
- 3) ways and purposes of personal data processing;
- 4) location of Irida, LLC, information of people (except employees of Irida, LLC) who have access to the personal data or who are entitled to learn the personal data upon a contract with the processor or according to the Federal Laws;
- 5) the processed personal data of the associated personal data owner, source they are received from, unless otherwise procedure is stated by the current legislation;
- 6) terms of personal data processing, including the storage terms;

- 7) the procedure of fulfilment of the personal data owner's rights according to FZ On Personal Data;
- 8) information of performed or future trans-border transfer of personal data;
- 9) full names and addresses of those, who process the personal data upon the assignment of Irida, LLC, if processing is or will be assigned to them;
- 10) other data in compliance with FZ On Personal Data or other federal laws.

- **Rights and Obligations of Irida, LLC**

1. When collecting personal data, Irida, LLC, is to provide the personal data with the information provided [in cl. 7, Article 14](#) of the Federal law On Personal Data.

2. If provision of personal data is compulsory pursuant to the federal laws, Irida, LLC, is to explain to the personal data owners the legal consequences of the refusal to provide their personal data.

3. If the personal data were received not from the personal data owner, Irida, LLC, is to provide the personal data owner with the following information (except in cases provided by p.4 Art. 18 of the Federal Law On Personal Data):

- 1) full name and address of Irida, LLC, or their representative;
- 2) legal framework and purposes of personal data processing;
- 3) assumed users of personal data;
- 4) rights of the personal data owner according to the Federal Law On Personal Data;
- 5) the source the personal data are received from.

4. Irida, LLC, has the right not to provide this information provided in [p. 3](#) Article 18 of the Federal Law On Personal Data, if:

- 1) the personal data owner has been informed of the personal data processing by the associated processor;

- 2) the personal data were received by the processing pursuant to the federal law or fulfilling a contract with the personal data owner as the beneficiary or the principal;

- 3) the personal data were made public by the personal data owner or were received from a public source;

- 4) the processor processes the personal data in statistic or other research purposes, to perform professional [activities](#) of a journalist, for scientific, literature or other art activity subject to the rights and legal interests of the personal data owner;

- 5) submission of the information provided by [p.3](#) Article 18 of the Federal Law On Personal Data infringes the rights and legal interests of a third party.

5. When collecting personal data, including with the Internet telecommunication network means, Irida, LLC, is to provide collection, recording, arrangement, accumulation, storage, updating (amendments), retrieval, usage, transfer (distribution, provision, access), anonymization, blocking, deleting, extermination of personal data of the Russian federation citizens only with data bases in the territory of the Russian Federation, except cases provided by [cl. HYPERLINK "consultantplus://offline/ref=5EF40D32C68AD54EC3A553991989E3B4641AED4536AAEBA2C2D1E732AEE1321459F4BFDAF14EE6EE265FBAABA172630B2AEFE7405D5605AAS8QBK" \\_2, 3, 4, 8 p.1 Article 6](#) of the Federal Law On Personal Data.