

POLICY
IN RELATION TO THE PERSONAL DATA PROCESSING
IN FITNESS ON KAZANSKAYA LIMITED LIABILITY COMPANY

1. INTRODUCTION

1.1. This Policy defines the procedure of personal data processing and measures applied to ensure the security of personal data in Fitness on Kazanskaya Limited Liability Company (hereinafter - the Company), which acts as operator of personal data.

1.2. The policy in relation to personal data processing (hereinafter - the Policy) has been developed in accordance with the requirements of Federal Law No. 152-ФЗ dated 27.07.2006 "On Personal Data", Order of the Government of the Russian Federation No. 1119 dated 01.11.2012 "On Approval of the Requirements for Protection of Personal Data During Processing Thereof within Personal Data Information Systems", Order of the Government of the Russian Federation No. 687 dated 15.09.2008 "On Approval of the Regulation Concerning the Specificity of Personal Data Processing with no Automation Facilities Being Used".

1.3. The Policy has been developed to ensure implementation of the requirements of the legislation of the Russian Federation in the field of personal data processing, aimed at ensuring the protection of the personal and civil rights and freedoms during personal data processing, including protection of the rights to privacy, personal and family privacy, particularly for protection against unauthorized access and illegal distribution of personal data processed in the information systems of the Company.

1.4. The Policy applies to the information received by the Company about the subject of personal data in the process of services rendering or performance of the contractual obligations, as well as in the process of maintaining the labour relations with the Company.

1.5. This Policy discloses the list of subjects of personal data, the principles, the procedure and the conditions of personal data processing provided by the employees and other persons whose personal data is processed by the Company, aimed at ensuring the protection of the personal and civil rights and freedoms during personal data processing, including protection of the rights to privacy, personal and family privacy.

1.6. Personal data constitutes confidential, strictly secured information, and is subject to all the requirements established by the internal documents of the Company in terms of protection of confidential information.

2. CATEGORIES OF PERSONAL DATA SUBJECTS

2.1. The list of personal data processed by the Company is generated in accordance with the Federal Law on Personal Data and other regulatory documents of the Russian Federation.

2.2. The information constituting personal data is any information directly or indirectly relating to an identified or identifiable individual person (the subject of personal data).

2.3. Depending on the subject of personal data, the Company processes personal information of the following categories of subjects of personal data:

- the Company employee's personal data required in connection with the employment relations, and concerning any specific employee;
- personal data of the applicant for a vacant position;
- personal data of the Manager or an employee of a legal entity which is the contractor of the Company, required for fulfillment of its obligations in the contractual relations with the contractor, and to comply with the requirements of the legislation of the Russian Federation;
- personal data of individual persons - the Company's contractors.

3. PURPOSES OF PERSONAL DATA PROCESSING

3.1. The Company carries out personal data processing for the following purposes:

- conclusion, performance and termination of civil law contracts with individual persons, legal entities, individual entrepreneurs and other persons in the cases stipulated by the current legislation;
- organization of personnel records, ensuring the compliance with the laws and other statutory legal acts, conclusion and fulfillment of labour and civil contracts; HR records administration, assistance in employment, training and promotion, using various types of benefits, enforcement of tax compliance in connection with calculation and payment of individual income tax and unified social tax, pension legislation in the course of generation and representation of personal data on each recipient of income, to be taken into account when calculating the insurance contributions for compulsory pension insurance and social security, completion of initial statistical documents in accordance with the Labour Code of the Russian Federation, Tax Code of the Russian Federation, Federal Laws, in particular: "On Individual (Personified) Recording in the Compulsory Pension Insurance System", "On Personal Data".

4. TERMS OF PERSONAL DATA PROCESSING

4.1. Terms of personal data processing shall be determined in accordance with the validity term of the contract signed with the personal data subject, as well as other requirements of the legislation of the Russian Federation. 4.2. The Company must create and keep the documents containing the information about the subjects of personal data. Requirements to use of the data of standard forms of documents are established by Order of the Government of the Russian Federation No. 687 dated 15.09.2008 "On Approval of the Regulation Concerning the Specificity of Personal Data Processing with no Automation Facilities Being Used".

5. RIGHTS

- 5.1. The Company acting as data operator, shall be entitled to:
- defend its interests in court;
 - provide the subjects' personal data to third parties if so required by the applicable law (by tax, law enforcement authorities, etc.);
 - refuse to provide personal data in the cases stipulated by the law;
 - use the personal data of the subject without their consent, in the cases provided for by the law.
- 5.2. The subject whose personal data are processed by the Company, shall have the right to:
- demand clarification of their personal data, blocking or destruction thereof in case such personal data is incomplete, outdated, false, unlawfully obtained or is not necessary for the declared purpose of such processing, and also to take legal measures aimed at protection of their rights;
 - demand the list of their personal data processed by the Company, and the source thereof;
 - obtain the information about the term of processing of their personal data, including the terms of storage thereof ;
 - demand notification to be given to all persons who previously received incorrect or incomplete data on all the exceptions, corrections of or additions to their personal data;
 - appeal to the authorized body dealing with protection of rights of subjects of personal data, or to court, against unlawful acts or inaction admitted at processing of their personal data;
 - protect their rights and legitimate interests, including those to indemnification and (or) compensation of moral damage, in judicial order.

6. DUTIES OF THE COMPANY EMPLOYEES

- 6.1. Company employees admitted to personal data processing, shall be obliged to:
- familiarize themselves with this Policy and other internal documents of the Company, regulating personal data processing, and comply with the requirements of such documents;
 - implement personal data processing only within the framework of execution of their official duties;
 - never disclose personal data access to which was obtained by them due to official duties thereof;
 - notify the employees of the information security department of the facts of disclosure (destruction, distortion) of personal data.

7. PRINCIPLES AND CONDITIONS OF PERSONAL DATA PROCESSING

- 7.1. Personal data processing shall be implemented on the basis of:
- legality and fairness of the purposes and means of personal data processing;
 - consistency of the purposes of personal data processing with the purposes previously defined and declared at the time of personal data collection;
 - conformity of the volume and nature of personal data being processed, the methods of personal data processing, with the objectives of personal data processing;
 - accuracy of personal data, sufficiency thereof for the purposes of processing, inadmissibility of personal data processing excessive in terms of the purpose declared at the time of personal data collection;
 - combination of various databases containing the personal data processing of which is carried out for inconsistent purposes is inadmissible;
 - storage of personal data in the form that allows one to identify the subject of personal data, during the period not exceeding the time required for the purpose of such processing;
 - destruction or depersonalization upon achievement of the purposes of personal data processing, or in case when achievement thereof is no longer needed.
- 7.2. Personal data processing is carried out on the basis of the conditions determined by the legislation of the Russian Federation.

8. PROVIDING FOR SECURITY OF PERSONAL DATA

- 8.1. The Company shall take the necessary technical and organisational measures in order to ensure safety of personal data and protection thereof against unauthorized access (including incidental access), destruction, modification, blocking of access and other unauthorized actions.
- 8.2. For purposeful creation of adverse conditions and hazards for the persons violating the rules and attempting to receive unauthorized access to personal data for the purpose of illegal possession, modification, destruction, malware infection, replacement and other unauthorized actions, the following organizational and technical measures shall be applied:
- appointment of the officials responsible for organization of processing and protection of personal data;
 - imposing restrictions on the number of employees having access to personal data;
 - familiarization of employees with the requirements of the Federal Law and regulatory documents of the Company on processing and protection of personal data;
 - ensuring the recording and storage of the information on tangible media and circulation thereof, excluding theft, spoofing, unauthorized copying and destruction of personal data;
 - identification of threats to the security of personal data during their processing, formation of threat models

on their basis;

- implementation of the system of authorization of user access to the information resources, software and hardware means of information processing and protection;
- registration and recording of actions of the users of personal data information systems ;
- password protection of user access to the personal data information system;
- implementation of the anti-virus control, prevention of introduction of malware (software viruses) into the corporate network, and software bugs;
- centralized management of personal data protection system.
- data back-up measures;
- ensuring the recovery of the personal data modified or destroyed due to unauthorized access thereto;
- training of employees using the information protection means applied in the personal data information systems, the rules of working with them;
- accounting of the applied means of information protection, operational and technical documentation thereto;
- use of information protection frames which have passed the prescribed conformity assessment procedure;
- implementation of user activity monitoring, conducting the investigations of violations of personal data security requirements;
- placement of technical means of personal data processing within the protected territory;
- organization of admission regime in the territory;
- maintenance of constant state of readiness of technical means of protection, alarm in the premises;
- other organizational and technical measures aimed at protection of personal data, provided for by normative documents of the Russian Federation and internal documents of the Company.

9. FINAL PROVISIONS

9.1. This Policy is an internal document of the Company which is available to general public and shall be placed on the official website of the Company.

9.2. This Policy is subject to modification, addition in case of the new legislative acts and special normative documents intended for processing and protection of personal data, but not less than once in three years. When the current version is amended, the date of the latest change shall be indicated. The Revised Policy shall become effective from the date of placement thereof, unless otherwise provided for in the new version of the Policy.

9.3. Control over execution of the requirements of this Policy shall be performed by the person responsible for organizing personal data processing.

9.4. Responsibility of the Company's employees to whom access to personal data was granted, for failure to comply with the requirements of the normative documents regulating the processing and protection of personal data, shall be defined in accordance with the legislation of the Russian Federation and the internal documents of the Company.