

I hereby approve:

General Director

of LLC "Milecom"

_____/P.A. Isakin/

____ 2017

REGULATION ON PERSONAL DATA OF CONTRACTORS – PRIVATE INDIVIDUALS AND EMPLOYEES OF CONTRACTORS - LEGAL ENTITIES

1 General provisions

a This Regulation determines the procedure for dealing with personal data of contractors of LLC "Milecom" (hereinafter referred to as the "Company") – private individuals (incl. individual entrepreneurs), as well as employees of contractors of LLC "Milecom" of legal entities. This Regulation is applicable in respect of all personal data received by the Company from personal data owners of contractors (hereinafter referred to as the "Contractor"), entered into contractual relations with the Company, within the framework of performance of obligations under the contracts.

b Regulation of activities with personal data is intended to ensure compliance with the legitimate rights and interests of the Company, its contractors, their employees in connection with the possibility of obtaining, systematization (combining), storing and transferring information constituting personal data.

c Personal Information - any information relating directly or indirectly to the defined or determined private individual (subject of personal data) and contained in documents received and compiled by the Company in process of implementation of activities and interaction with contractors (incl. contracts, powers of attorney, primary accounting documents, copies of passports, certificates, etc.), including:

- surname, first name, patronymic;
 - sex, age, date and place of birth;
 - place of residence;
 - marital status, parental status, family relations,
 - social, property status;
 - education, qualifications, training and information on qualifications;
 - facts of biography and work activity (place of work, amount of earnings, previous conviction, service in the army, work in elective offices, in the civil service, etc.);
 - financial status (income, debts, ownership of real estate, cash deposits, etc.);
 - business and other personal qualities that are assessed,
- other similar information providing error-free identification of the subject of personal data.

a Information about personal data is referred to as confidential (constituting the Company's secret protected by law). The regime of confidentiality regarding personal data is removed in cases provided for by federal laws.

1 Basic concepts. Composition of personal data of employees

a For the purposes of this Regulation, the following basic concepts are used:

- contractor - legal entity, an individual entrepreneur with obligations in the Company, arising in connection with the conclusion of a contract or other grounds provided for by law;
- personal data - information necessary for the operator to fulfill his obligations, including the full name of the general director, chief accountant or other authorized employees of the contractor, contained in the forms of business papers (paper medium) or transmitted through the Internet;
- processing of the employee's personal data - any action (operation) or set of actions (operations) performed using automation tools or without using such means with personal data, including collection, recording, systematization, accumulation, storage, specification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;
- confidentiality of personal data - a requirement for compliance by a designated responsible person who has access to personal data of employees with the requirement not to allow their distribution without the consent of the owner or other legal basis;
- distribution of personal data - actions aimed at disclosing personal data to an indeterminate set of persons (transfer of personal data) or acquaintance with personal data of an unlimited number of persons, including promulgation of personal data in the mass media, placement in information and telecommunication networks or the provision of access to personal data in any other way;
- use of personal data - actions (operations) with personal data performed by an authorized officer of the Company for the purpose of taking decisions or performing other actions that produce legal consequences with respect to owners or otherwise affecting the rights and freedoms of others;
- destruction of personal data - actions resulting in the impossibility to restore the contents of personal data in the personal data information system and (or) as a result of which material data carriers of personal data are destroyed;
- protection of personal data - the Company's actions in the processing of personal data aimed at applying legal, organizational and technical measures to limit unauthorized, accidental access, destruction, modification, blocking, copy, provision, distribution to an indefinite set of individuals;
- depersonalization of personal data - actions resulting in the impossibility of using additional information to determine the ownership of personal data to a particular person;
- publicly available personal data - personal data, access to an unrestricted set of persons to which it was granted with the consent of the owner or for which confidentiality requirements do not apply in accordance with federal laws;
- information - data (messages, information) regardless of the form of their presentation;

- documented information - information recorded on a tangible medium by documenting, with details that allow to determine such information or its material carrier.

- a The Company does not create or store groups of documents containing personal data of contractors - individuals (incl. individual entrepreneurs), as well as employees of contractors - legal entities in single or combined form.

2.3 The Company in the course of its activities receives information about contractors, their employees. If this information contains personal data, the requirements of collecting, processing, storing, protecting personal data are fully applicable to it.

1 Personal data processing

- a The company does not specifically collect, request, process or transfer to anybody personal data of contractors - individuals and contractor's employees - legal entities, except for requesting, processing and transferring to the authorized bodies (the Federal Tax Service of Russia, off-budget funds) of personal data of contractors - individuals in order to fulfill the duties of the tax agent for the payment of personal income tax, as well as other cases directly specified in federal laws.

- b The source of information on all personal data of the contractor - private individual is himself. All personal data of the contractor – private individual should be obtained from him. If personal data can only be obtained from a third party, then the contractor – private individual must be notified of this in advance and a written consent must be obtained from him. The company should inform the contractor – private individual about the purposes, prospective sources and methods of obtaining personal data, as well as about the nature of the personal data to be obtained and the consequences of refusal to give written consent for their receipt.

- c The processing of personal data can be carried out solely for the purpose of enforcing compliance with laws and other regulatory legal acts.

- d Written consent for the processing and transfer of personal data of the contractor - private individual may be included in the contract concluded with him.

- e In order to ensure the rights and freedoms of a person and a citizen, the head of the Company and his legal, plenipotentiary representatives in the processing of personal data must fulfill the following general requirements:

- i the processing of personal data may be carried out solely to ensure compliance with laws or other legal acts.

- ii In determining the scope and content of processed personal data, the Company shall be guided by the Constitution of the Russian Federation, the Civil Code of the Russian Federation, the Tax Code of the Russian Federation, the Labor Code of the Russian Federation and other federal laws.

- iii Protection of personal data from misuse, loss is provided by the Company at its own expense in the manner prescribed by federal law. Protection of personal data of contractors from illegal or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions with it from third parties is carried out in the manner established by the current legislation of the Russian Federation.

iv Employees of the Company should be acquainted with the receipt of the Company's documents that establish the procedure for processing personal data, as well as their rights and obligations in this area.

v In all cases, the refusal of the contractor - private individual from his rights to preservation and protection of secrecy is invalid.

1 Transfer, storage of personal data

a By transfer of personal data of the contractor - private individual, the Company must comply with the following requirements:

i Not to disclose the personal data of the contractor - private individual to a third party without his written consent, with the exception of cases established by federal law.

ii Not to disclose the personal data of the contractor - private individual in commercial purposes.

iii Warn the persons who have received the personal data of the contractor - private individual that these data can only be used for the purposes for which they are communicated and to require these persons to confirm that this rule is observed. Persons who have received personal data of the contractor - private individual, must comply with the regime of secrecy (confidentiality).

iv To transfer personal data within the Company in accordance with this Regulation.

v Permit access to personal data only to specially authorized persons, and these persons should have the right to receive only those personal data that are necessary for the performance of a particular function.

b Documents containing personal data of the contractor - private individual and the contractor's employees - legal entities are processed and stored in paper form in a way that provides protection from unauthorized access, copying, transfer to third parties. Storage of information on paper carriers is carried out in specially equipped cabinets and rooms.

The information in the electronic form is stored in the personal data information system, which is subject to appropriate protection. Internal access (inside the organization) to the personal data of contractors, clients is carried out in accordance with the job descriptions of the Company's employees. Obligations for storing documents containing personal data of contractors, customers are assigned to a specific employee and fixed by order. Access to personal data of contractors, customers without special permission is given to: general director, technical director, commercial director, chief accountant.

1 Rights of contractors

5.1. Receive information about the fact of processing and the composition of the processed personal data;

5.2. Obtain information about the methods of processing personal data, the processing time and storage of personal data;

5.3. Require the Company to clarify, block or destroy personal data, if personal data are incomplete, obsolete, inaccurate, processed for purposes other than the stated purposes.

1 Company's obligations

- 6.1. Ensure the protection of personal data in accordance with applicable laws of the Russian Federation.
- 6.2. Provide information on the processed personal data and the possibility of acquaintance with personal data upon request of contractors.
- 6.3. At the request of contractors, customers or an authorized body for the protection of the rights of subjects of personal data, ensure the blocking of personal data of the corresponding contractor.
- 6.4. Terminate processing of personal data if the purpose of processing is reached, at the request of contractors, customers or an authorized body for the protection of the rights of owners of personal data.
- 6.5. Keep records on the storage and transfer of personal data to third parties in order to fulfill obligations and provide related services.
- 6.6. In case of reorganization, liquidation of the Company, ensure the appropriate preservation of personal data, their transfer or destruction in accordance with the current legislation of the Russian Federation.

1 Responsibility for violation of the rules regulating the processing of personal data

a Persons guilty of violating the rules regulating the receipt, processing and protection of personal data, are subject to disciplinary and material liability in accordance with the procedure established by the Labor Code of the Russian Federation and other federal laws, and are also brought to civil, administrative and criminal liability in accordance with the procedure established by federal laws.