

Personal Data Protection and Processing Policy

This website is operated by TAIGA GROUP LLC.

General Provisions

This personal data protection and processing policy (hereinafter – the Policy) has been developed by LLC "TAIGA GROUP" (hereinafter – the Company) in accordance with clause 2 of Article 18.1 of the Federal Law "On Personal Data" No. 152-FZ dated July 27, 2006, and the recommendations on drafting a document determining the operator's policy regarding personal data processing as established by the Federal Law "On Personal Data" No. 152-FZ dated July 27, 2006, published on August 1, 2017 on the official website of the Federal Service for Supervision of Communications, Information Technology and Mass Media, in implementation of the provisions of the Labor Code of the Russian Federation and other normative legal acts of the Russian Federation in the field of personal data protection and processing, applicable contracts, and defines the basic principles, purposes, conditions and methods of processing personal data, lists of data subjects and their rights, as well as the primary requirements for personal data protection.

This personal data protection and processing policy has also been approved to ensure compliance with the data protection compliance guidelines of LLC "TAIGA GROUP" and serves as the basis for the Company's development of local normative acts regulating specific issues of processing, storage, disclosure and other actions with personal data *of individuals who have provided their personal data to the Company* by completing information fields on the Company's websites, in particular, but not limited to, the List of Positions Involving Processing of Personal Data, the Provision on Ensuring Personal Data Security in Processing in the Company's Information Systems.

This Policy does not apply to relationships arising from the processing of personal data of the Company's employees, as well as its contractors with whom civil law contracts have been concluded.

Terms and Definitions

This Policy uses the following terms and definitions:

Personal Data — any information relating to a directly or indirectly identified or identifiable individual (data subject);

Personal Data Operator — a legal entity that independently or jointly with other parties organizes and/or carries out the processing of personal data, and also determines the purposes of personal data processing, the scope of personal data to be processed, and the actions (operations) performed with personal data. The Operator is the Company located at [address of registered office];

Processing of Personal Data — any action (operation) or set of actions (operations) performed with or without the use of automated means applied to personal data, including collection, recording, systematization, accumulation, storage, refinement (updating, modification), retrieval, use, transmission (dissemination, provision, access), anonymization, blocking, deletion, and destruction of personal data;

Automated Processing of Personal Data — processing of personal data using computer equipment;

Personal Data Information System — a set of personal data contained in databases and the information technologies and technical means that ensure their processing;

Dissemination of Personal Data — actions aimed at disclosing personal data to an indefinite circle of persons;

Disclosure of Personal Data — actions aimed at disclosing personal data to a definite circle of persons;

Blocking of Personal Data — temporary suspension of processing of personal data (except where processing is necessary for clarification of personal data);

Destruction of Personal Data — actions as a result of which it becomes impossible to restore the contents of personal data in the personal data information system and/or as a result of which material carriers of personal data are destroyed;

Anonymization of Personal Data — actions as a result of which it becomes impossible to determine, without the use of additional information, the attribution of personal data to a specific data subject;

Cross-Border Transfer of Personal Data — transfer of personal data to the territory of a foreign state to a foreign state authority, a foreign individual or a legal entity;

Confidentiality of Personal Data — ensuring by the Operator of the necessary and sufficient level of information security of personal data and business processes within which they are processed;

Data Subjects — individuals who have provided their personal data by completing information fields on the Company's websites.

Principles and Purposes of Personal Data Processing

When processing personal data, the Company is guided by the following principles, taking into account the need to ensure the protection of the rights and freedoms of employees, including the right to privacy, and personal and family secrets:

- lawfulness and fairness;
- timeliness and accuracy of obtaining consent from the data subject for processing of personal data;
- processing only those personal data that correspond to the purposes of their processing;
- correspondence of the content and scope of processed personal data to the stated purposes of processing. Processed personal data must not be excessive in relation to the stated purposes of their processing;
- inadmissibility of combining databases containing personal data processed for purposes that are incompatible with each other;
- ensuring the accuracy of personal data, their sufficiency, and where necessary, their relevance to the purposes of processing personal data. The Company takes necessary and sufficient measures or ensures their implementation to delete or clarify incomplete or inaccurate data;
- storage of personal data in a form that allows identification of the data subject for no longer than required by the purposes of processing personal data.

Personal data is processed by the Company for the following purposes:

- to process and fulfill customer orders;
- to conduct promotional campaigns by the Company;
- to promote the Company's services and/or goods by establishing direct contact with the data subject using various means of communication, including, but not limited to: mail, email, telephone, the Internet, social media;
- for other purposes if the relevant actions of the Company do not contradict the applicable legislation, the Company's activities, and consent from the data subject for such processing has been obtained.

List of Personal Data Processed by the Company:

- surname, name, patronymic;
- position;
- contact telephone number;
- email address;
- data automatically transmitted to website services in the process of their use through software installed on the data subject's device, including IP address, cookie file data, information about the data subject's browser (or other software used to access the services), technical characteristics of equipment and software used by the data subject, date and time of access to the services, addresses of requested pages and other similar information;
- participation of the data subject as a result of using website services in motivational programs, such as attending trainings, completing training courses, participating in conferences and visiting various facilities in the publishing and printing industry and paper production.

Processing of personal data relating to racial or ethnic origin, political views, religious or philosophical beliefs, or intimate life is not carried out by the Company.

Rights and Obligations of the Company and Data Subjects

When processing personal data, the Company:

- takes measures necessary and sufficient to ensure compliance with the requirements of the legislation of the Russian Federation and local normative acts
- takes measures necessary and sufficient to protect Personal Data from unlawful or accidental access to it and from the commission of unlawful actions in relation to Personal Data;
- appoints a person responsible for organizing the Processing of Personal Data in the Company;
- publishes or otherwise ensures unrestricted access to this Policy;
- guarantees and ensures compliance with all rights of the Data Subject provided for by current legislation;
- performs other actions provided for by the legislation of the Russian Federation in the field of Personal Data.

Data Subjects have the right to:

- information about their Personal Data being processed in the Company;
- access to their Personal Data, including the right to obtain a copy of any record containing their Personal Data, except in cases provided for by federal law;
- clarification of their Personal Data, its Blocking or Destruction in the event that the Personal Data is incomplete, outdated, inaccurate, unlawfully obtained, or is not necessary for the stated purpose of Processing;
- withdrawal of consent to the Processing of Personal Data;
- adoption of measures provided for by law to protect their rights;
- exercise of other rights provided for by the legislation of the Russian Federation.

Regarding requests and appeals from Data Subjects, their representatives, and the authorized body for the protection of rights of Data Subjects, the Company follows a policy of maximum speed and objectivity in responding. The procedure for responding to requests and appeals from Data Subjects and their representatives, authorized bodies regarding the inaccuracy of Personal Data, the unlawfulness of its Processing, withdrawal of consent, and access of the Data Subject to their data, is established in the relevant local normative acts of the Company that regulate issues of Processing of Personal Data.

Processing of Personal Data

Personal Data is processed exclusively:

- with the consent of the Data Subject to the Processing of their Personal Data, unless otherwise provided for by the legislation of the Russian Federation in the field of Personal Data;
- the Company does not disclose or distribute Personal Data to third parties without the consent of the Data Subject, unless otherwise provided for by the legislation of the Russian Federation;

The Company has the right to entrust the Processing of Personal Data to another person with the consent of the Data Subject on the basis of a contract concluded with such person, containing a list of actions (operations) with Personal Data that

will be performed by the person carrying out the Processing of Personal Data, the purposes of Processing, the obligations of such person to maintain the Confidentiality of Personal Data and ensure security, including protection, of Personal Data during their Processing;

- access to Personal Data processed by the Company is permitted only to employees of the Company holding positions included in the list of positions, the appointment to which involves the Processing of Personal Data.

The Company carries out the collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transmission (dissemination, provision, access), anonymization, Blocking, deletion, and Destruction of Personal Data.

In the event of Cross-Border Transfer of Personal Data, the Company is obliged to verify that the foreign state, to the territory of which the transfer of Personal Data is intended to be carried out, ensures adequate protection of the rights of Data Subjects prior to the commencement of such transfer.

Personal Data is processed by means of:

- non-automated Processing of Personal Data;

- automated Processing of Personal Data with transmission of the obtained information through information and telecommunications networks or without such;
- mixed Processing of Personal Data.

Measures Taken by the Company to Ensure Compliance with Data Operator

Obligations in the Processing of Personal Data

In order to take measures to ensure compliance with Data Operator obligations in the Processing of Personal Data, the Company:

- appoints a person responsible for organizing the Processing of Personal Data;
- adopts local normative acts and other documents in the field of Processing and Protection of Personal Data;
- organizes training for employees occupying positions included in the list of positions the replacement of which involves the Processing of Personal Data;
- obtains the consent of the Data Subject for the Processing of Personal Data, except in cases provided for by the legislation of the Russian Federation;
- ensures separate storage of Personal Data and their material carriers, the processing of which is carried out for different purposes and containing different categories of Personal Data;
- ensures storage of material carriers of Personal Data in compliance with conditions that ensure the preservation of Personal Data and exclude unauthorized access to them;
- takes other measures provided for by the legislation of the Russian Federation in the field of Personal Data.

Measures to ensure the security of Personal Data during their Processing in Personal Data Information Systems are established in accordance with the local normative acts of the Company.

The Company carries out internal control over compliance with the legislation of the Russian Federation and local normative acts in the field of Personal Data, including requirements for the Protection of Personal Data. Internal control is ensured by the person responsible for organizing the Processing of Personal Data.