

Personal Data Processing Policy

1. General Provisions

This Personal Data Processing Policy was developed pursuant to the requirements of the Federal Law No. 152-FZ On Personal Data issued on July 27th, 2006, and establishes a personal data processing procedure and personal data safety measures in NPO Spetselektromekhanika JSC (hereinafter “Operator”).

1. The Operator sets observance of human and civil rights and freedoms in processing any personal data, including the right for privacy, personal and family secrets, as the most important objective and condition of its activities.
2. This Personal Data Processing Policy (hereinafter “Policy”) applies to all and any data that the Operator may obtain in regards to the visitors of the <http://semgroup.ru>.

2. Basic terms and definitions used in the Policy

1. Computer-assisted personal data processing: Processing of personal data with employment of computing hardware;
2. Blocking of personal data: A temporary suspension of personal data processing (except in the event when the processing is required to update the personal data);
3. Website: A combination of graphic and information materials, as well as computer software and data bases that enable such information accessibility at the following URL: <http://semgroup.ru>;
4. Personal data information system: A combination of personal data, contained in the data bases, and IT solutions and technical means allowing for processing of such data;
5. Depersonalization of personal data: Actions, resulting in making it impossible to associate any personal data with a specific User or any other personal data subject without using additional information;
6. Personal data processing: Any action (operation) or a combination of actions (operations), carried out with or without the help of automated processes, in connection with personal data, including collecting, capturing, classifying, accumulating, saving, reviewing (updating, changing), retrieving, utilizing, transmitting (disseminating, providing, granting access), depersonalizing, blocking, deleting, or destroying any personal data;
7. Operator: A public authority, municipal body, natural person or legal entity which solely or jointly with others arranges processing and/or processes any personal data, and determines the purposes of personal data processing, contents of the personal data to be processed, actions (operations) carried out in connection with the personal data;
8. Personal data: Any information directly or indirectly relating to an identified or identifiable User of <http://semgroup.ru>;
9. User: Any visitor of <http://semgroup.ru>;
10. Provision of personal data: Any actions aimed at disclosing personal data to a certain person of a certain group of persons;
11. Dissemination of personal data: Any actions aimed at disclosing any personal data to general public (transmitting personal data) or at familiarizing the general public with the personal data, including publishing the personal data in mass media, publishing in data telecommunications networks, or granting access to the personal data by any other means;
12. Cross-border transmission of personal data: A transmission of personal data to a foreign territory, to authorities of a foreign territory, to a foreign natural person or legal entity;
13. Deletion of personal data: Any actions, resulting in permanent destruction of any personal data with no further recovery of the personal data contents in the personal data information system and/or in destruction of any physical storage media with personal data.

3. The Operator has the right to process the below personal details of the Users:

1. Last name, first name, patronymic/middle name;
2. E-mail address;
3. Phone numbers;
4. Year, month, day and place of birth;
5. Photographic images;
6. Information relating to education, professional occupation, area of expertise and qualification, details of education documents;
7. Information on previously held positions and work experience, military duty, military registration;
8. Further, the Website collects and processes depersonalized data on the visitors (including cookie-files) employing Internet statistics services (such as Yandex Metrica and Google Analytics, etc.).
9. Pursuant to the provisions of this Policy the above details are commonly described as Personal Data.

4. Personal data processing objectives

1. The objective of the User's personal data processing comprises informing the User via electronic messages.
2. Further, the Operator has the right to notify the User of any new products and services, limited offers and various events. The User may at any time refuse from receiving such information messages by sending an electronic message to the Operator at sem-bf@semgroup.ru with subject "Unsubscribe from notifications on new products and services, and limited offers".
3. Depersonalized personal details of the Users, retrieved with the help of Internet-statistics services, are used for collecting information on the Users' actions on the Website to improve the Website and its contents.

5. Legal basis for personal data processing

1. The Operator processes the User's personal details only in the event such data was filled and/or sent by the User through dedicated forms available on <http://semgroup.ru>. By filling such dedicated forms and/or sending his/her personal details to the Operator, the User gives his/her consent with the provisions of this Policy.
2. The Operator processes the depersonalized User's details provided this is enabled in the User's Internet browser settings (enabled cookie-files saving and JavaScript technology).

6. Procedure for personal data collection, storage, transmittal and other kinds of processing

Safety of the personal data, processed by the Operator, is ensured by implementing legal, organizational and technical measures required to fully comply with the requirements of the applicable personal data protection legislation.

1. The Operator guarantees the safety of the personal data and takes all possible precautions to prevent any unauthorized access to the personal data.
2. The User's personal data shall never and in no circumstances be disclosed to any third parties, with the exception of events related to compliance with the applicable legislation.
3. In the event of any discrepancies in the personal details the User can update such details himself/herself by sending an electronic message with a notification to the Operator at sem-bf@semgroup.ru with subject "Personal data update".
4. The duration of the personal data processing is indefinite. The User may at any moment withdraw his/her consent for personal data processing by sending an electronic message with such notification to the Operator at sem-bf@semgroup.ru with subject "Withdrawal of consent for personal data processing".

7. Cross-border transmission of personal data

1. Prior to performing a cross-border transmission of personal data the Operator shall ensure that the authorities of a foreign state, whose territory the personal data will be transmitted to, guarantee a reliable protection of the rights of the personal data owners.
2. A cross-border transmission of personal data to the territories of foreign states, that do not comply with the above requirements, may only be allowed under a written consent of the personal data owner for the cross-border transmission of his/her personal details and/or in an event of implementation of an agreement, which such owner is a part to.

8. Concluding provisions

1. The User can obtain clarifications on any issues relating to his/her personal data processing by sending an electronic message with an inquiry to the Operator at sem-bf@semgroup.ru.
2. This document will reflect any changes in the policy for personal data processing by the Operator. This Policy remain in force indefinitely unless replaced with a newer version.
3. An updated version of this Policy is publicly available in the Internet at URL: <http://semgroup.ru/policy.pdf>.