

Personal Data Processing Policy

1. General Provisions

1.1. This Personal Data Processing Policy (hereinafter the «Policy») has been developed in pursuance of the requirements of clause 2 of part 1 of Article 18.1 of Federal Law No. 152-FZ of 27 July 2006 «On Personal Data» (hereinafter the «Personal Data Law») for the purpose of ensuring the protection of human and civil rights and freedoms in the processing of personal data, including the protection of the rights to inviolability of private life and to personal and family secrets.

1.2. The Policy applies to all personal data processed by the zaleycash resource (hereinafter the «Operator»).

1.3. The Policy extends to relations in the field of personal data processing that arose for the Operator both before and after the approval of this Policy.

1.4. In pursuance of the requirements of part 2 of Article 18.1 of the Personal Data Law, this Policy is published and freely accessible on the information and telecommunications network «Internet» on the Operator's website zaleycash.com.

1.5. Key terms used in the Policy:

personal data — any information relating to a directly or indirectly identified or identifiable natural person (a personal data subject);

personal data operator (operator) — a state authority, a municipal authority, a legal entity or a natural person that, alone or jointly with other persons, organises and/or carries out the processing of personal data, and also determines the purposes of the processing of personal data, the composition of the personal data to be processed, and the actions (operations) performed with the personal data;

processing of personal data — any action (operation) or set of actions (operations) performed on personal data with or without the use of automation tools. The processing of personal data includes, among other things:

- collection;
- recording;
- systematisation;
- accumulation;
- storage;
- clarification (updating, modification);
- retrieval;
- use;
- transfer (dissemination, provision, access);
- depersonalisation;
- blocking;
- deletion;
- destruction;

automated processing of personal data — the processing of personal data by means of computer equipment;

dissemination of personal data — actions aimed at disclosing personal data to an indefinite range of persons;

provision of personal data — actions aimed at disclosing personal data to a specific person or a specific range of persons;

blocking of personal data — the temporary suspension of the processing of personal data (except where the processing is necessary in order to clarify the personal data);

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

depersonalisation of personal data — actions as a result of which it becomes impossible, without the use of additional information, to determine that the personal data belong to a specific personal data subject;

personal data information system — the aggregate of personal data contained in databases and of the information technologies and technical means ensuring their processing;

cross-border transfer of personal data — the transfer of personal data to the territory of a foreign state to a foreign state authority, a foreign natural person or a foreign legal entity.

1.6. Principal rights and obligations of the Operator.

1.6.1. The Operator has the right:

- 1) to determine independently the composition and the list of measures that are necessary and sufficient to ensure the performance of the obligations set out in the Personal Data Law and in the regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws;
- 2) to entrust the processing of personal data to another person with the consent of the personal data subject, unless otherwise provided by federal law, on the basis of a contract concluded with such person. A person processing personal data on the Operator's instructions is obliged to observe the principles and rules for the processing of personal data set out in the Personal Data Law;
- 3) where the personal data subject withdraws consent to the processing of personal data, the Operator is entitled to continue processing the personal data without the consent of the personal data subject where the grounds specified in the Personal Data Law are present;
- 4) to send the User notices about new products and services, special offers and various events. The User may at any time opt out of receiving informational messages by sending the Operator an email to the address (your email) marked «Opt-out of notices about new products and services and special offers».

1.6.2. The Operator is obliged:

- 1) to organise the processing of personal data in accordance with the requirements of the Personal Data Law;
- 2) to respond to enquiries and requests from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
- 3) to report to the authority responsible for the protection of the rights of personal data subjects (the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor)), at that authority's request, the necessary information within 30 days from the date of receipt of such request.

1.7. Principal rights of the personal data subject. The personal data subject has the right:

- 1) to receive information concerning the processing of their personal data, except in the cases provided for by federal laws. The information is provided to the personal data subject by the Operator in an accessible form and must not contain personal data relating to other personal data subjects, except where there are lawful grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Personal Data Law;
- 2) to require the operator to clarify, block or destroy their personal data where the personal data are incomplete, outdated, inaccurate, unlawfully obtained or not necessary for the stated purpose of processing, and also to take the measures provided for by law to protect their rights; to make the processing of personal data for the purposes of promoting goods, works and services on the market conditional upon prior consent;

3) to appeal against unlawful acts or omissions of the Operator in the processing of their personal data to Roskomnadzor or in court.

1.8. Compliance with the requirements of this Policy is monitored by the authorised person responsible for organising the processing of personal data at the Operator.

1.9. Liability for breaching the requirements of the legislation of the Russian Federation and of regulations in the field of the processing and protection of personal data is determined in accordance with the legislation of the Russian Federation.

2. Purposes of Collecting Personal Data

2.1. The processing of personal data is limited to the achievement of specific, predetermined and lawful purposes. The processing of personal data that is incompatible with the purposes of collecting the personal data is not permitted.

2.2. Only personal data that correspond to the purposes of their processing are subject to processing.

2.3. The Operator processes personal data for the following purposes:

- ensuring compliance with the Constitution of the Russian Federation, federal laws and other regulatory legal acts of the Russian Federation;
- carrying out its activities in accordance with its charter;
- maintaining personnel records;
- assisting employees with employment, obtaining education and career advancement, ensuring the personal safety of employees, monitoring the quantity and quality of the work performed, and ensuring the safekeeping of property;
- attracting and selecting candidates for employment with the Operator;
- arranging the individual (personified) registration of employees in the mandatory pension insurance system;
- completing and submitting the required reporting forms to executive authorities and other authorised organisations;
- engaging in civil law relations;
- maintaining accounting records;
- operating the access control regime.

2.4. The processing of employees' personal data may be carried out exclusively for the purpose of ensuring compliance with laws and other regulatory legal acts.

3. Legal Grounds for Processing Personal Data

3.1. The legal grounds for the processing of personal data are the body of regulatory legal acts in pursuance of and in accordance with which the Operator processes personal data, including:

- the Constitution of the Russian Federation;
- the Civil Code of the Russian Federation;
- the Labour Code of the Russian Federation;
- the Tax Code of the Russian Federation;
- Federal Law No. 14-FZ of 08 February 1998 «On Limited Liability Companies»;
- Federal Law No. 402-FZ of 06 December 2011 «On Accounting»;
- Federal Law No. 167-FZ of 15 December 2001 «On Mandatory Pension Insurance in the Russian Federation»;
- other regulatory legal acts governing relations connected with the Operator's activities.

3.2. The legal grounds for the processing of personal data also include:

- the charter;
- contracts concluded between the Operator and personal data subjects;
- the consent of personal data subjects to the processing of their personal data.

4. Scope and Categories of Personal Data Processed, Categories of Personal Data Subjects

4.1. The content and scope of the personal data processed must correspond to the stated purposes of processing set out in Section 2 of this Policy. The personal data processed must not be excessive in relation to the stated purposes of their processing.

4.2. The Operator may process the personal data of the following categories of personal data subjects.

4.2.1. Candidates for employment with the Operator:

- surname, first name, patronymic;
- sex;
- citizenship;
- date and place of birth;
- contact details;
- information on education, work experience and qualifications;
- other personal data provided by candidates in their CVs and cover letters.

4.2.2. Employees and former employees of the Operator:

- surname, first name, patronymic;
- sex;
- citizenship;
- date and place of birth;
- image (photograph);
- passport details;
- address of registration at the place of residence;
- actual residential address;
- contact details;
- individual taxpayer number (INN);
- insurance number of the individual personal account (SNILS);
- information on education, qualifications, professional training and advanced training;
- marital status, children, family relationships;
- information on employment history, including any incentives, awards and/or disciplinary sanctions;
- marriage registration data;
- military registration information;
- information on disability;
- information on the withholding of alimony;
- information on income from the previous place of employment;
- other personal data provided by employees in accordance with the requirements of labour legislation.

4.2.3. Family members of the Operator's employees:

- surname, first name, patronymic;
- degree of kinship;
- year of birth;
- other personal data provided by employees in accordance with the requirements of labour legislation.

4.2.4. Clients and counterparties of the Operator (natural persons):

- surname, first name, patronymic;
- date and place of birth;
- passport details;
- address of registration at the place of residence;
- contact details;
- position held;
- individual taxpayer number (INN);
- settlement account number;
- other personal data provided by clients and counterparties (natural persons) that are necessary for concluding and performing contracts.

4.2.5. Representatives (employees) of the Operator's clients and counterparties (legal entities):

- surname, first name, patronymic;
- passport details;
- contact details;
- position held;
- other personal data provided by representatives (employees) of clients and counterparties that are necessary for concluding and performing contracts.

4.3. The Operator's processing of biometric personal data (information characterising a person's physiological and biological features, on the basis of which their identity can be established) is carried out in accordance with the legislation of the Russian Federation.

4.4. The Operator does not process special categories of personal data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, state of health or sex life, except in the cases provided for by the legislation of the Russian Federation.

5. Procedure and Conditions for Processing Personal Data

5.1. The Operator processes personal data in accordance with the requirements of the legislation of the Russian Federation.

5.2. Personal data are processed with the consent of the personal data subjects to the processing of their personal data, and also without such consent in the cases provided for by the legislation of the Russian Federation.

5.3. The Operator carries out both automated and non-automated processing of personal data.

5.4. Access to the processing of personal data is granted to those employees of the Operator whose job duties include the processing of personal data.

5.5. Personal data are processed by means of:

- obtaining personal data orally and in writing directly from the personal data subjects;
- obtaining personal data from publicly available sources;
- entering personal data into the Operator's logs, registers and information systems;
- using other methods of processing personal data.

5.6. Disclosure to third parties and dissemination of personal data without the consent of the personal data subject are not permitted, unless otherwise provided by federal law.

5.7. The transfer of personal data to bodies of inquiry and investigation, to the Federal Tax Service, the Pension Fund of the Russian Federation, the Social Insurance Fund and other authorised executive authorities and organisations is carried out in accordance with the requirements of the legislation of the Russian Federation.

5.8. The Operator takes the necessary legal, organisational and technical measures to protect personal data against unlawful or accidental access, destruction, modification, blocking, dissemination and other

unauthorised actions, including that it:

- identifies threats to the security of personal data during their processing;
- adopts local regulations and other documents governing relations in the field of the processing and protection of personal data;
- appoints persons responsible for ensuring the security of personal data in the Operator's structural units and information systems;
- creates the necessary conditions for working with personal data;
- organises the recording of documents containing personal data;
- organises work with the information systems in which personal data are processed;
- stores personal data under conditions that ensure their safekeeping and preclude unlawful access to them;
- organises training for the Operator's employees who process personal data.

5.9. The Operator stores personal data in a form that permits the personal data subject to be identified for no longer than is required by the purposes of processing the personal data, unless the retention period for the personal data is established by federal law or by contract.

5.10. When collecting personal data, including via the information and telecommunications network «Internet», the Operator ensures the recording, systematisation, accumulation, storage, clarification (updating, modification) and retrieval of the personal data of citizens of the Russian Federation using databases located within the territory of the Russian Federation, except in the cases specified in the Personal Data Law.

6. Updating, Correction, Deletion and Destruction of Personal Data; Responses to Subjects' Requests for Access to Personal Data

6.1. Confirmation of the fact that personal data are processed by the Operator, the legal grounds for and purposes of the processing of personal data, and other information specified in part 7 of Article 14 of the Personal Data Law, are provided by the Operator to the personal data subject or their representative upon an enquiry, or upon receipt of a request from the personal data subject or their representative.

The information provided does not include personal data relating to other personal data subjects, except where there are lawful grounds for disclosing such personal data.

The request must contain:

- the number of the principal identity document of the personal data subject or their representative, information on the date of issue of that document and the issuing authority;
- information confirming the personal data subject's involvement in relations with the Operator (contract number, date of conclusion of the contract, conventional verbal designation and/or other information), or information otherwise confirming the fact that the personal data are processed by the Operator;
- the signature of the personal data subject or their representative.

The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

If an enquiry (request) from a personal data subject does not set out all the necessary information as required by the Personal Data Law, or if the subject does not have rights of access to the requested information, a reasoned refusal shall be sent to them.

The personal data subject's right of access to their personal data may be restricted in accordance with part 8 of Article 14 of the Personal Data Law, including where the personal data subject's access to their personal data infringes the rights and lawful interests of third parties.

6.2. Where inaccurate personal data are identified upon an enquiry from the personal data subject or their representative, or at their request or at the request of Roskomnadzor, the Operator shall block the personal data relating to that personal data subject from the moment of such enquiry or receipt of the said request for the

period of verification, provided that the blocking of the personal data does not infringe the rights and lawful interests of the personal data subject or of third parties.

Where the fact that the personal data are inaccurate is confirmed, the Operator shall, on the basis of the information submitted by the personal data subject or their representative or by Roskomnadzor, or of other necessary documents, clarify the personal data within seven business days from the date such information is submitted and lift the blocking of the personal data.

6.3. Where unlawful processing of personal data is identified upon an enquiry (request) from the personal data subject or their representative or from Roskomnadzor, the Operator shall block the unlawfully processed personal data relating to that personal data subject from the moment of such enquiry or receipt of the request.

6.4. Upon achievement of the purposes of processing the personal data, and also where the personal data subject withdraws consent to their processing, the personal data are subject to destruction, unless:

- otherwise provided by a contract to which the personal data subject is a party, beneficiary or guarantor;
- the operator is entitled to carry out the processing without the consent of the personal data subject on the grounds provided for by the Personal Data Law or other federal laws;
- otherwise provided by another agreement between the Operator and the personal data subject.