

Personal Data Processing Policy

1. General Provisions

1.1. This Personal Data Processing Policy has been drawn up in accordance with the requirements of Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006 (hereinafter referred to as the Personal Data Law) and defines the procedure for processing personal data and measures to ensure the security of personal data taken by Joint Stock Company Izhevsky Opytno-Mekhanichesky Zavod (IOMZ JSC) (hereinafter referred to as the Processor).

1.2. The Processor establishes as its primary goal and condition for the implementation of its activities the respect for human and civil rights and freedoms when processing personal data, including the protection of the rights to privacy, personal and family secrets.

1.3. This Processor's policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Processor may obtain with respect to visitors of the website [[http\(s\)://www.iomz.ru/](http(s)://www.iomz.ru/)].

1.4. Information about the Processor:

Name: Joint Stock Company Izhevsky Opytno-Mekhanichesky Zavod;

Address: 51B Gagarin str., Izhevsk, Udmurt Republic, 426049;

Processor's contact details: tel. (3412) 222-888, e-mail: office@iomz.ru

1.5. The processing of personal data is carried out based on the Consent of the subject, the need to fulfill the contract and other legal grounds provided for in Article 6 of Federal Law 152-FZ.

2. General Definitions Used in the Policy

2.1. Automated personal data processing means the processing of personal data using means of computer technology.

2.2. Blocking of personal data means the temporary termination of the processing of personal data (except in cases where the processing is necessary to clarify personal data).

2.3. Website means a website on the Internet at: [[http\(s\)://www.iomz.ru/](http(s)://www.iomz.ru/)]

2.4. Personal data information system means a set of personal data contained in databases and information technologies and hardware that ensure their processing.

2.5. Anonymization of personal data means actions that make it impossible to determine without using additional information whether personal data belongs to a specific User or another personal data subject.

2.6. Personal data processing means any action (operation) or set of actions (operations) performed with or without the use of automation facilities with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data.

2.7. Processor means an organization that independently or jointly with other persons arranges and (or) performs the processing of personal data, as well as determines the purposes of processing, the composition of personal data to be processed, and actions (operations) performed with personal data;

2.8. Personal data means any information related directly or indirectly to a specific or identifiable User of the website <https://www.iomz.ru>.

2.9. Personal data authorized by the personal data subject for dissemination means personal data to which an unlimited number of persons have access provided by the personal data subject by giving consent to the processing of personal data authorized by the personal data subject for

dissemination in accordance with the procedure provided for by the Personal Data Law (hereinafter referred to as Personal Data Authorized for Dissemination).

2.10. User means any visitor of the website [[http\(s\)://www.iomz.ru/](http(s)://www.iomz.ru/)]

2.11. Provision of personal data means actions aimed at disclosing personal data to a certain person or a certain group of persons.

2.12. Dissemination of personal data means any actions aimed at disclosing personal data to an indefinite group of persons (transfer of personal data) or at familiarizing with personal data of an unlimited number of persons, including the publication of personal data in mass media, posting in information and telecommunications networks or otherwise granting access to personal data.

2.13. Cross-border transfer of personal data means the transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

2.14. Destruction of personal data means any actions that result in the irrevocable destruction of personal data with the impossibility of further restoration of the content of personal data in the personal data information system and/or destruction of the physical media of personal data.

2.15. Cookies means a small piece of data sent by a web server and stored on the User's computer, which the web client or web browser sends to the web server each time in an HTTP request when trying to open the page of the corresponding website.

For more details about the use of cookies, see the Processor's Cookies Files Policy.

3. Basic Rights and Obligations of the Processor

3.1. The Processor is entitled to:

- obtain reliable information and/or documents containing personal data from the personal data subject;

- if the personal data subject withdraws consent to the processing of personal data, as well as sending a request to terminate the processing of personal data, the Processor is entitled to continue processing personal data without the consent of the personal data subject, provided there are grounds stipulated in Article 6 of Federal Law 152-FZ (for example, contract performance, legitimate interests of the Processor);

- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Personal Data Law and statutory and regulatory enactments adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws.

3.2. The Processor is obliged to:

- provide the personal data subject, upon his/her request, with information related to the processing of his/her personal data;

- arrange for the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;

- respond to applications and requests from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;

- inform the authorized body for the protection of the rights of personal data subjects at the request of this body of the necessary information within 10 days from the date of receipt of such request;

- publish or otherwise provide unrestricted access to this Personal Data Processing Policy;

- take legal, organizational and technical measures to protect personal data from unlawful or accidental access to it, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unlawful actions with respect to personal data;

- stop transferring (disseminating, providing, accessing) personal data, stop processing and destruct personal data in accordance with the procedure and cases provided for by the Personal Data Law;

- perform other duties stipulated by the Personal Data Law.

4. Basic Rights and Obligations of Personal Data Subjects

4.1. Subjects of personal data are entitled to:

- obtain information regarding the processing of his/her personal data, except in cases provided for by federal laws. The information is provided to the personal data subject by the Processor in a simple form, and it shall not contain personal data related to other personal data subjects, except in cases where there are legitimate grounds for the disclosure of such personal data. The list of information and the procedure for obtaining it are established by the Personal Data Law;
- demand from the Processor the clarification of his/her personal data, their blocking or destruction in case the personal data is incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated objective of processing, as well as to take measures provided by law to protect their rights;
- set forth a condition of prior consent when processing personal data in order to promote goods, works and services on the market;
- withdraw consent to the processing of personal data, as well as to send a request to terminate the processing of personal data;
- appeal to the authorized body for the protection of the rights of personal data subjects or in court against unlawful actions or failure to act of the Processor during the processing of his/her personal data;
- exercise other rights provided for by the legislation of the Russian Federation.

4.2. The personal data subjects are obliged to:

- provide the Processor with reliable personal data;
- inform the Processor about the clarification (updating, changes) of his/her personal data.

4.3. Persons that have provided the Processor with false information about themselves or information about another personal data subject without the latter's consent are exposed to liability in accordance with the legislation of the Russian Federation.

5. Personal Data Processing Principles

5.1. Personal data is processed on a lawful and fair basis.

5.2. The processing of personal data is limited to the achievement of specific, predetermined and legitimate objectives. Processing of personal data incompatible with the objectives of personal data collection is not allowed.

5.3. It is not allowed to combine databases containing personal data, the processing of which is carried out for objectives incompatible with each other.

5.4. Only personal data that meets the objectives of their processing is subject to processing.

5.5. The content and scope of personal data processed correspond to the stated objectives of processing. Excessiveness of the processed personal data in relation to the stated objectives of its processing is not allowed.

5.6. When processing personal data, the accuracy of personal data, its sufficiency, and, if necessary, its relevance to the objectives of personal data processing are ensured. The Processor takes the necessary measures and/or ensures that they are taken to delete or clarify incomplete or inaccurate data.

5.7. The personal data is stored in a form that makes it possible to identify the subject of personal data for no longer than the purposes of personal data processing require, unless the period of personal data storage is established by federal law, an agreement to which the personal data subject is a party, beneficiary or guarantor. The personal data being processed is destroyed or anonymized upon achievement of the processing objectives or in case of loss of the need to achieve these objectives, unless otherwise provided by federal law.

6. Personal Data Processing Objectives

Processing objective	Conclusion of contracts, order handling, marketing newsletters (with consent)
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Personal data	<ul style="list-style-type: none"> • full name • e-mail address • phone numbers • position • company name
Legal grounds	Consent of the subject, performance of the contract (clause 5, part 1, Article 6 of Federal Law 152-FZ)
Personal data processing types	<ul style="list-style-type: none"> • Collection, recording, systematization, accumulation, storage, destruction and anonymization of personal data • Sending information letters to an email address

7. Personal data processing conditions

7.1. In cases of personal data processing that is not explicitly provided for by applicable law or an agreement with the subject, such processing is carried out following the obtaining the Consent of the personal data subject.

7.2. The Consent form shall comply with the requirements of the law.

In cases established by the Personal Data Law, the processing of personal data is carried out only with the written Consent of the personal data subject. Consent in the form of an electronic document signed with an electronic signature in accordance with federal law is deemed to be equivalent to a written Consent on paper containing a handwritten signature of the personal data subject.

In other cases, Consent may be expressed as certain actions performed by the personal data subject, such as marking, checking boxes, filling in appropriate fields in forms and check-lists on the Processor's website.

Consent to the personal data processing shall be formalized separately from other information and (or) documents that are confirmed and (or) signed by the personal data subject.

7.3. The processing of personal data by the Processor shall be carried out in compliance with the principles and rules provided for by the legislation of the Russian Federation and the Processor's regulatory documents applicable to personal data. The processing of personal data by the Processor is allowed in the following cases:

1) the processing of personal data is carried out subject to the Consent of the personal data subject to the processing of his/her personal data;

2) the processing of personal data is necessary for:

- achieving the goals stipulated by an international agreement of the Russian Federation or a law for the implementation of the functions, powers and duties assigned to the Processor by the legislation of the Russian Federation;

- in connection with a person's participation in constitutional, civil, administrative, criminal, and arbitration proceedings;

- execution of a court order, a decree of another body or official subject to fulfillment in accordance with the legislation of the Russian Federation concerning the enforcement proceedings (hereinafter referred to as the execution of a court order);

- fulfillment of an agreement to which the personal data subject is a party or beneficiary or guarantor, as well as to conclude an agreement at the initiative of the personal data subject or an agreement under which the personal data subject will be the beneficiary or guarantor;

- protection of life, health or other vital interests of the personal data subject, if it is impossible to obtain the consent of the personal data subject;

- exercising the rights and legitimate interests of the Processor or third parties, or to achieve publicly significant goals, provided that the rights and freedoms of the personal data subject are not violated.

- statistical or other research purposes, subject to mandatory anonymization of personal data and in accordance with the procedure provided for by the Federal Law "On Personal Data";
- publication or mandatory disclosure of information in accordance with the legislation of the Russian Federation.

7.4. If the personal data subject refuses to provide the necessary and sufficient amount of his/her personal data, the Processor will not be able to take the necessary actions to achieve the processing objectives.

7.5. The personal data subject may withdraw his/her Consent to the processing of personal data at any time by sending an e-mail notification to the Processor's e-mail address office@iomz.ru marked "Withdrawal of Consent to the Personal Data Processing". Data processing is terminated within 30 days of receiving the withdrawal of consent.

7.6. If the personal data subject or his/her representative withdraws consent to the processing of personal data, the Processor is entitled to continue processing personal data without the consent of the personal data subject, provided there are grounds specified in paragraphs 2-11 of part 1 of Article 6, part 2 of Article 10 and Part 2 of Article 11 of Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006.

8. Procedure for Collecting, Storing, Transferring and Other Types of Personal Data Processing

8.1. The security of personal data processed by the Processor is ensured by means of implementation of legal, organizational and technical measures necessary to fully comply with the requirements of current legislation applicable to personal data protection, including:

8.1.1. Organizational measures:

- appointment of individuals or legal entities responsible for arranging the processing and ensuring the security of personal data;
- publication of local regulations on personal data processing, information security, and familiarization of employees with them;
- employee training in personal data processing and information security;
- ensuring the physical security of premises and processing facilities, access control, security, video surveillance;
- restriction and differentiation of access of employees and other persons to personal data and processing facilities, monitoring of actions related to personal data;
- identification of threats to the security of personal data during their processing in personal data information systems, making threat models based on them;
- accounting and storage of information media, avoiding their theft, substitution, unauthorized copying and destruction;
- implementation of in-house control over compliance with the established procedure, checking the effectiveness of measures taken, responding to incidents;
- verification of the availability of contracts, including, if necessary, clauses in contracts to ensure the confidentiality and security of personal data;
- maintaining an in-house register of personal data processing operations in order to monitor compliance with security measures, etc.;

8.1.2. Technical measures of protection:

- restriction of access to information systems by using authentication and authorization tools;
- use of encryption facilities in the transmission and storage of personal data;
- information backup for the possibility of recovery;
- use of security tools (antivirus tools, firewalls, protection against unauthorized access, cryptographic information protection tools), including, if necessary, those that have passed the compliance assessment procedure in accordance with the established procedure;
- regular software updates and information security audits, etc.

8.2. The Processor ensures the safety of personal data and takes all possible measures to avoid an access to personal data by unauthorized persons.

8.3. The User's personal data will never, under no circumstances, be transferred to third parties, except in cases related to the implementation of current legislation or if the personal data subject provides the Consent to the Processor to transfer data to a third party in order to fulfill obligations under a civil contract.

8.4. Should any inaccuracies be identified in personal data, the User can update them independently by sending a notification to the Processor's email address office@iomz.ru marked "Updating Personal Data".

8.5. The period of personal data processing is determined by the achievement of the purposes for which the personal data had been collected, unless another period is stipulated by the contract or current legislation. The data retention period is determined taking into account the purposes of processing, and unless otherwise provided by contract or law, the data is stored for 5 years from the moment of termination of interaction with the subject.

The User may withdraw his/her Consent to the processing of personal data at any time by sending an e-mail notification to the Processor's e-mail address office@iomz.ru marked "Withdrawal of Consent to the Personal Data Processing". The User's request is reviewed by the Processor within 30 days.

8.6. All information collected by third-party services, including payment systems, communications facilities, and other service providers, is stored and processed by these persons (Processors) in accordance with their User Agreement and Privacy Policy. The Processor enters into agreements with third parties obliging them to comply with the requirements of Federal Law 152-FZ. The Processor is not responsible for the actions of third parties, including the service providers specified herein.

8.7. The prohibitions established by the personal data subject on the transfer (other than granting access), as well as on the processing or conditions of processing (other than gaining access) of personal data permitted for dissemination, do not apply in cases of processing personal data in the state, public and other public interests defined by the legislation of the Russian Federation.

8.8. The Processor ensures the confidentiality of personal data when processing personal data.

8.9. The Processor stores personal data in a form that makes it possible to identify the subject of personal data for no longer than the purposes of personal data processing require, unless the period of personal data storage is established by federal law, an agreement to which the personal data subject is a party, beneficiary or guarantor.

8.10. The condition for termination of personal data processing may be the achievement of the goals of personal data processing, the expiration of the Consent of the personal data subject, the withdrawal of Consent by the personal data subject or the claim to terminate the processing of personal data, as well as revealing of unlawful processing of personal data.

8.11. The Processor maintains an in-house register (record keeping) of personal data processing operations, which allows monitoring their processing and timely taking measures to ensure data security.

9. List of Actions Performed by the Processor Pertaining to the Obtained Personal Data

9.1. The Processor collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distributes, provides, accesses), anonymizes, blocks, deletes, and destructs personal data.

9.2. The Processor fulfills automated processing of personal data with or without receiving and/or transmitting the information obtained via information and telecommunications networks, by means of profiling operations or the use of automated solutions.

10. Cross-Border Transfer of Personal Data

10.1. Prior to the commencement of activities on the cross-border transfer of personal data, the Processor is obliged to notify the authorized body for the protection of the rights of personal data subjects of its intention to carry out cross-border transfer of personal data (such notification is sent separately from the notification of the intention to process personal data).

10.2. Prior to submitting the above notification, the Processor is obliged to obtain relevant information from the authorities of a foreign state, foreign individuals, and foreign legal entities to whom the cross-border transfer of personal data is intended.

10.3. When carrying out cross-border transfer of personal data, the Processor takes into account the requirements for such transfer in accordance with applicable law. Prior to the transfer, the Processor evaluates the confidentiality of personal data and ensuring the security of personal data during their processing by authorities of foreign states, foreign individuals, and foreign legal entities to whom the cross-border transfer of personal data is intended.

10.4. The Processor informs the subjects of personal data about the cases of the cross-border transfer of their personal data, information about such transfer is published on the website (in the current revision of the Policy) so that the subjects can independently familiarize themselves with it.

10.5. Cross-border transfer is carried out only to countries that provide adequate protection of personal data, or if there is a Consent of the subject.

11. Confidentiality of Personal Data

The Processor and other persons who have obtained access to personal data are obliged not to disclose or disseminate personal data to third parties without the consent of the personal data subject, unless otherwise provided by federal law.

The Processor's officials are allowed to process personal data only following the signing a non-disclosure agreement.

12. Final Provisions

12.1. The User can obtain any clarifications on issues of interest related to the processing of his/her personal data by contacting the Processor via e-mail office@iomz.ru.

12.2. This document will reflect any changes to the Personal Data Processing Policy made by the Processor. The Policy shall remain in force indefinitely until superseded by a new revision.

12.3. The current version of the Policy is freely available on the Internet at [\[http\(s\)://www.iomz.ru/\]](http(s)://www.iomz.ru/)