

Approved by
Director



Position

On the processing of personal data

1. GENERAL PROVISIONS

- 1.1. This Regulation on the processing of personal data (hereinafter referred to as the Regulation, this Regulation) has been developed by Heihe Yilin Economic TradingCO. , LIMITED. (hereinafter also the "Operator") and is applied in accordance with cl. 18.1. Federal Law of July 27, 2006 No. 152-FZ "On Personal Data". This Regulation determines the policy of the Operator with regard to the processing of personal data. All issues related to the processing of personal data, not regulated by this Regulation, are resolved in accordance with the current legislation of the Russian Federation in the field of personal data. This Regulation and amendments to it are approved by the Operator's head and are entered by the Operator's order.
- 1.2. In accordance with paragraph 1 of Art. 3 of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data", personal data of clients and individuals means any information relating to a client or an individual (hereinafter referred to as personal data), directly or indirectly determined or determined on the basis of such information.
- 1.3. Heihe Yilin Economic TradingCO. , LIMITED. is an operator organizing and (or) processing personal data, as well as defining the purposes and content of personal data processing.
- 1.4. The purpose of processing personal data is:
- ensuring the protection of human and civil rights and freedoms while processing his personal data, including protecting the rights to privacy, personal and family secrets;
 - Operator's rendering to the individual and legal entities of services related to the Operator's business activities, including the Operator's contacts with such persons, including by e-mail, by phone, to the address provided by the relevant person;
 - referral of consultations, replies to the contact persons using the means of communication and the contract data specified by them;
 - Promotion of goods, works, services of the Operator in the market by making direct contacts with the potential consumer by means of communication facilities (it is allowed only under the condition of prior consent of the subject of personal data).
- 1.6. Processing is organized by the Operator on the principles:
- the legitimacy of the purposes and methods of processing personal data, integrity and fairness in the activities of the Operator;
 - reliability of personal data, their sufficiency for processing purposes, inadmissibility of

- processing personal data that is redundant in relation to the purposes claimed in the collection of personal data;
- processing only personal data that meet the objectives of their processing;
 - Conformity of the content and volume of processed personal data to the stated processing objectives. The processed personal data should not be excessive in relation to the declared purposes of their processing;
 - Inadmissibility of combining databases containing personal data, processing of which is carried out for purposes that are not compatible with each other;
 - Ensuring the accuracy of personal data, their sufficiency, and in necessary cases and relevance in relation to the purposes of processing personal data. The operator takes the necessary measures or ensures their acceptance for the removal or refinement of incomplete or inaccurate data;
 - storage of personal data in a form that allows you to determine the subject of personal data, no longer than the purpose of processing personal data. Обработка персональных данных осуществляется с соблюдением принципов и правил, предусмотренных Федеральным законом от 27.07.2006 № 152-ФЗ «О персональных данных» и настоящим Положением.
- 1.7. Processing of personal data is carried out in compliance with the principles and rules provided for by Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" and this Regulation.
- 1.8. In accordance with the goals and objectives set, the Operator, before starting the processing of personal data, appoints the person responsible for organizing the processing of personal data.
- 1.8.1. The person responsible for organizing the processing of personal data receives instructions directly from the executive body of the Operator and is accountable to him.
- 1.8.2. 1.8.2. The person responsible for organizing the processing of personal data has the right to make out and sign the notice provided for in Parts 1 and 3 of Art. 22 of the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data".
- 1.9. Employees of the Operator who directly handle the processing of personal data must be familiarized before working with the provisions of the legislation of the Russian Federation on personal data, including requirements for the protection of personal data, documents defining the operator's policy regarding the processing of personal data, local processing acts Personal data, with this Regulation and amendments thereto.
- 1.10. When processing personal data, the Operator applies legal, organizational and technical measures to ensure the security of personal data in accordance with Art. 19 of the Federal Law of July 27, 2006 № 152-FZ "On Personal Data."
- 1.11. When carrying out the collection of personal data using information and telecommunications networks, the Operator is required to publish in the relevant information and telecommunications network a document specifying his policy regarding the processing of personal data and information on the current requirements for the protection of personal data, and to provide access to the document from Using the means of the relevant information and telecommunications network.
- 1.12. 1.12. Terms of personal data processing by the Operator. Processing of personal data is allowed in the following cases:
- 1) the processing of personal data is carried out with the consent of the subject of personal data to the processing of his personal data;
 - 2) the processing of personal data is necessary to achieve the goals stipulated by the international treaty of the Russian Federation or the law for the implementation and performance of functions, powers and duties imposed by the legislation of the Russian Federation on the Operator;
 - 3) the processing of personal data is necessary for the performance of a contract to which the subject of personal data, either the beneficiary or the guarantor, is a party, including if the Operator has exercised its right to assign rights (claims) under such a contract, as well as to

- conclude a contract on the initiative of the entity Personal data or contract, according to which the subject of personal data will be the beneficiary or guarantor;
- 4) the processing of personal data is necessary to protect the life, health or other vital interests of the subject of personal data if obtaining the consent of the personal data subject is impossible;
 - 5) the processing of personal data is necessary to exercise the rights and legitimate interests of the Operator or third parties or to achieve socially significant goals, provided that the rights and freedoms of the subject of personal data are not thereby violated;
 - 6) the processing of personal data is carried out for statistical or other research purposes, with the exception of the purposes specified in Art. 15 of the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data", subject to obligatory depersonalization of personal data;
 - 7) processing of personal data, access of an unlimited circle of persons to which is provided by the subject of personal data or at his request;
 - 8) processing of personal data subject to publication or mandatory disclosure in accordance with federal law.
- 1.13. The storage of personal data must be in the form that allows the subject of personal data to be determined no longer than the purpose of processing requires, and they are subject to destruction upon achievement of processing purposes or in the event of the loss of the need to achieve them in the manner provided for in the Regulation on the storage of personal data The operator.
- 1.14. Personal data that is processed in information systems must be protected from unauthorized access and copying. The safety of personal data when processing them in information systems is provided by means of a personal data protection system that includes organizational measures and information protection means. The hardware and software must comply with the information protection requirements established in accordance with the legislation of the Russian Federation.
- 1.15. Interaction with federal executive authorities on the processing and protection of personal data of entities whose personal data are processed by the Operator is carried out within the framework of the legislation of the Russian Federation.

2. PROVIDING THE RIGHT TO THE OPERATOR SUBJECTS OF PERSONAL DATA

- 2.1. Subjects of personal data or their representatives have the rights provided for by Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" and other regulatory legal acts regulating the processing of personal data.
- 2.2. The operator ensures the rights of subjects of personal data in the manner prescribed by Chapters 3 and 4 of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data".
- 2.3. The operator is obliged to provide free of charge to the subject of personal data or his representative the opportunity to get acquainted with the personal data relating to this subject of personal data, at the location of the Operator during the Operator's working hours.
- 2.4. The right of the subject of personal data to access his personal data may be restricted in accordance with federal laws.
- 2.5. In case of representation of the interests of the subject of personal data by a representative, the representative's credentials are confirmed by a power of attorney issued in accordance with the established procedure.
- 2.6. In cases when the subject provides personal data with written consent to use personal data for such consent, a simple written form is sufficient.
- 2.7. The operator guarantees the safety and confidentiality of the personal data used.
- 2.8. Processing of personal data in order to promote goods, works, services on the market by making direct contacts with a potential consumer by means of communication is allowed only with the prior consent of the subject of personal data.

3. OBTAINING, PROCESSING, STORAGE OF PERSONAL DATA

3.1. The Operator shall establish the following procedure for obtaining personal data:
3.1.1. When applying for the services of the Operator, the client indicates the data set by the corresponding forms.

3.1.2. The operator does not receive or process the client's personal data about his race, political views, religious and philosophical convictions, health status, intimate life, unless otherwise provided by law.

3.1.3. In cases directly related to the issues of labor relations, in accordance with Art. 24 of the Constitution of the Russian Federation The organization is entitled to receive and process data on the private life of the client only with his written consent.

3.2. In the event that the customer accepts an offer placed on the Operator's website or concludes another agreement with the Operator, the processing of the client's personal data is carried out for the execution of the relevant contract that came into effect due to acceptance of the terms of the offer by the client or the conclusion of another contract, respectively.

3.3. Also, the Operator has the right to process personal data of customers who applied to the Operator of individuals only with their consent to use personal data.

↓ The consent of the client to the processing of personal data is not required in the following cases:

↓ - personal data are publicly available;

↓ - processing of personal data is carried out on the basis of the federal law establishing its purpose, the conditions for obtaining personal data and the circle of subjects whose personal data are subject to processing, as well as a certain authority of the Organization;

↓ - at the request of authorized state bodies - in cases provided for by federal law;

↓ - processing of personal data for the purpose of executing a contract concluded with the Operator;

↓ - processing of personal data is carried out for statistical or other scientific purposes subject to obligatory depersonalization of personal data;

↓ - processing of personal data is necessary to protect the life, health or other vital interests of the client, if obtaining his consent is impossible.

3.5. The operator ensures the safe storage of personal data, including:

3.5.1. Storage, acquisition, accounting and use of documents containing personal data is organized in the form of a separate archive of the Operator.

3.5.2. The storage of personal data must be in the form that allows the subject of personal data to be determined no longer than the purpose of personal data processing requires, unless the period of personal data storage is established by a federal law, an agreement to which the subject of personal data is a party whose beneficiary or guarantor is the subject. The processed personal data shall be destroyed or depersonalized upon the achievement of the processing objectives or in the event of the loss of the need to achieve these goals, unless otherwise provided by federal law.

4. TRANSFER OF PERSONAL DATA

↓ Personal data is transmitted with the following requirements:

↓ - it is forbidden to disclose personal data to a third party without the written consent of the client, unless it is necessary to prevent a threat to life, the health of the client, and in other cases provided for by laws;

↓ - not to disclose personal data for commercial purposes without the written consent of the subject of such data;

↓ - to warn persons receiving personal data that these data can be used only for the purposes for which they are communicated and to require these persons to confirm that this rule is observed;

↓ - allow 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 performing

specific functions;

- ↓ - do not request information about the health of the client, except for those information that relate to the issue of the client's ability to fulfill obligations under the contract with the Operator;
- ↓ - transfer personal data of the client to its representatives in the manner established by Federal Law No. 152-FZ of 27.07.2006 "On Personal Data".

5. ACCESS TO PERSONAL DATA

5.1. The right of access to personal data is:

- ↓ - Head of the Operator;
 - ↓ - Employees of the Operator working with a certain client;
 - ↓ - Accounting staff;
 - ↓ - employees who provide technical support for the activities of the Operator.
- ↓ Clients have the following rights in order to protect personal data:
- ↓ - on the full information about their personal data and processing of this data;
 - ↓ - free, free access to their personal data, including the right to receive copies of any record containing personal data, except as provided for by federal law;
 - ↓ - to determine their representatives to protect their personal data;
 - ↓ - the requirement to exclude or correct incorrect or incomplete personal data, as well as data processed in violation of the requirements of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data"

5.3. Copy and make statements of personal data is permitted only for official purposes with the permission of the manager.

6. RESPONSIBILITY FOR VIOLATION OF NORMS REGULATING PERSONAL DATA PROCESSING

- 6.1. Persons guilty of violating the procedure for handling personal data bear disciplinary, administrative, civil or criminal liability in accordance with federal laws.
- 6.2. Heads of the Operator's structural units bear personal responsibility for the performance of duties by their subordinates.