

The policy of Zenit-InvestProm in relation to processing of personal data Registered and trading address ZAO "Zenit-InvestProm": House 14, Sovetskaya St., Moscow Region, Krasnogorsk, Russia, 143403

1. Purpose and scope of the document

1. The Policy of ZAO "Zenith-InvestProm" (hereinafter referred to as "the Company") in relation of processing of personal data (hereinafter "The Policy") defines the position and intentions of the Company in the field of processing and protection of the personal data in order to ensure compliance with protection of rights and freedoms of each person and, in characteristics, the right to inviolability of private life, family and family secret, protection of one's honor and honest name.
2. The policy is strictly enforced by managers and employees of all the structural subdivisions and branches of ZAO "Zenit-InvestProm".
3. The policy action applies all personal data of subjects, processed in the Company using means of automation and without application of such means.
4. Every subject of the personal data has access to this policy.

2. Definitions

1. Personal data is any information, expressly or by implication defined or defining to a natural person (an individual). Such information, in particular, is possible to carry: Full name; year, month, date and place of birth; address.; information about the family, social, property positions,, information about education, profession, income; information about the state of health, as well as other information.
2. Processing of personal data is any action (or operation) with personal data, using means of automation or without using such funds. To such actions (operations) are included: collection, acquisition, recording, systematization, accumulation, storage, clarification(updated, changing), extraction, using, transferring (distribution, provision, accessing), depersonalization, freezing, deletion destruction of personal data.

3. Subjects of personal data of ZAO "Zenit-InvestProm" processes personal data of the following individuals:

- employees of ZA "Zenit-InvestProm";

- Entities with which contracts of a civil law character have been concluded
- candidates for vacant positions in ZAO "Zenit-InvestProm";
- customers of ZAO "Zenit-InvestProm";
- customers registered on the website of ZAO "Zenit-InvestProm"
- representatives of legal experts:
- providers (self-employed sole traders)

4. Principles and conditions for processing personal of data

1. Under the security of personal data ZAO "Zenit-InvestProm" understands the security of personal data from unauthorized or random access, destruction, alteration, freezeng, copying, provision, distribution of personal data, and also from other wrong acts with personal data and takes all the necessary legal, organizational and technical measures for protection of personal data.
2. Processing and security of personal data by ZAO "Zenit-InvestProm" is carried out in accordance with the requirements of the Russian Federation, Federal Law No. 152 "On personal data", subordinate acts, and other acts defying features of personal processing data of Federal Laws of the Russian Federation, leading and methodical documents of the FSTEC (Federal Service for Technology and Export Control) of Russia and the Federal Security Service.
3. While processing of personal data ZAO "Zenit-InvestProm" is committed to the following principles:
 - legality and fair basis:
 - restrictions on the processing of personal data by achieving specific pre-defined and legitimate aims;
 - preventing of processing personal data incompatible with the aims of collection of personal data;
 - preventing of database integration, containing personal data, which are processed in aims incompatible with each other;
 - processing of personal data, which correspond to the aims of their processing;
 - content compliance.
4. The company processes personal data only if at least one of the following conditions exist:

- processing of personal data is carried out with the consent of the subject for processing the personal data;
 - processing of personal data is necessary to achieve aims, prescribed by law, for implementation and compliance of the functions, powers and responsibilities imposed by law on the operator;
 - processing of personal data is necessary for performance of the contract, whose side is either beneficiary or guarantor on which the subject of personal data is, as well as for conclusion of an agreement initiated by subject of personal data, or agreement in which the subject is the beneficiary or guarantor.
 - processing of personal data is necessary for the exercise of rights and legitimate interests of the Company or third parties or to achieve socially significant goals provided, in case it does not violate rights and freedoms of the subject of personal data;
 - processing of personal data, accessed of an unlimited circle of persons to which is provided by the subject of personal data or through his request:
 - processing of personal data, subjected to the publication or compulsory disclosure is carried out in accordance with The Federal Law.
5. ZAO "Zenit-InvestProm" has the right to entrust processing personal data of citizens to third parties on the basis of a contract concluded with these persons.
 6. Persons performing processing personal data on behalf of ZAO "Zenit-InvestProm", undertake to observe principles and rules of processing and protection of personal data provided by Federal Law No. 152 "On the personal data". For each person a list of actions (operations) with personal data that will be performed by a legal entity processing personal data, processing chain the duty of such person to observe confidentiality and ensure security of personal data processing is established, as well as the requirements for protection of processed personal data.
 7. In cases established by law of The Russian Federation, ZAO "Zenit-InvestProm" has the right to transfer personal data of the individuals.
 8. For the purpose of information support, the Company can create publicly available sources of personal data of employees, including directories and address books. In the public sources of personal data with the consent of the employee may be included the surname, first name, patronymic, date and place of birth, family position, contact phone numbers, e-mail address. Information about the employee must be removed at

any time from publicly available personal data sources by the employee's request or by a court decision or other authorized representatives of government agencies.

9. The company destroys or impersonates personal data upon the achievement of processing objectives or in the event of the loss of the need to achieve the purpose of processing.

5. Rights of the personal data subject

A citizen whose personal data is being processed by ZAO "Zenit-InvestProm" has the right to:

- receive from ZAO " Zenit-InvestProm" the confirmation of the fact of processing the personal data.
- legal grounds and purposes of processing personal data;
- information about the processing methods of personal data used by ZAO "Zenit-InvestProm";
- the name and location of ZAO "Zenit-InvestProm";
- information about people who have access to personal data or to whom personal data can be disclosed to, based on the agreement with ZAO "Zenit-InvestProm "or on the basis of the Federal Law
- list of processed personal data related to an individual, from whom a request was made and the source of their perception if other order the provision of such data is not is provided by the Federal Law:
- information on the processing time of personal data, including the timing of the storage
- information on the procedure for implementation by an individual of the rights provided by the Federal Law "On the personal data "No. 152;
- information about personal data being transferred transboundary or being proposed to be transferred;
- name and address of the person, processing the personal data on behalf of ZAO "Zenit-InvestProm";
- other information provided for Federal Law "On the personal data "No. 152- or other Federal Laws;
- require clarification of their personaldata, blocking or destroying it in case the personal data is incomplete, outdated, inaccurate, Illegally caught or not necessary for the claimed aim of processing;

- withdraw the consent to processing personal data;
- to demand the elimination of unlawful actions with the personal data by ZAO "Zenit-InvestProm";
- appeal against the acts or omissions of acts of ZAO "Zenit-InvestProm" to the Federal Service on supervision in the field of communication, information technologies and mass communications (Roskomnadzor) in the court in case, if the individual believes that ZAO "Zenit-InvestProm" is implementing processing his personal data with breach of the requirements of the Federal Law No. 152 "On the personal data" or otherwise violates the rights and freedom,
- to protect their rights and legitimate interests, including compensation for damages and/or Compensation for the harm in the judicial order.

6 Responsibility

In case of failure to comply with the provisions of this Policy, ZAO " Zenit-InvestProm" is liable in accordance with the current legislation of the Russian Federation.

PLEASE CONSIDER!

To receive explanations on your interests concerning processing of your personal data, you have to address personally in the ZAO "Zenith-InvestProm "or by sending an official request using the Post of Russia at the address: 14 – Sovetskaya St., Krasnogorsk, Moscow Region, Russia 143403.

In case of sending an official request to Zenit-InvestProm in the text of your request you must specify:

- Full name
- Number of the identity paper, proving the identity of the individual, requesting about personal data, information about the date of issue and about the agency issued the document;
- information confirming your participation in the relations with ZAO "Zenit-InvestProm" or information confirming the fact of processing of personal data by ZAO "Zenit-InvestProm";
- signature of the individual (or his legal representative). If the request is sent using an electronic form, it should be done in the form of an electronic document and signed by an electronic signature in accordance with the legislation of the Russian Federation.

7. On the www.zenit.photo website is the actual version of "Policy of ZAO "Zenith-InvestProm" concerning the processing of personal data".

Information about the current requirements for protection of the personal data

ZAO "Zenith-InvestProm" takes the necessary legal organizational and technical measures to protect personal data from unauthorized or random access to them, destruction, change, blocking, copying, provision, diffusion of the personal data, as well as from other illegal acts concerning the personal data.

To such measures in accordance with the Federate Law No. 152 "On Personal Data" are related:

- Identification of threats to the security while processing of personal data
- using of organizational and technical security measures concerning personal data while processing in personal information systems, needed to perform requirements for the protection of personal data, implementation of which provides established by the Government of the Russian Federation levels of security of personal data;
 - using of the established procedures for conformity assessment means of information protection;
 - assessment of the effectiveness of the measures taken to personal safety data before putting it into the operation information system of personal data:
 - detection of unauthorized access to personal data and the taking actions
 - recovery of personal data, modified or destroyed due to unauthorized access to it;
 - setting access rules to personal data processed in personal information system data, as well as ensuring the registration and taking into account of all the actions taken with personal information data systems;
 - control over the measures taken to the safety of personal data and security level of the personal information data systems;
 - taking into the account computer storage of personal data:
 - organization of a access mode on the territory of the Company:
 - placement of technical means of processing personal data within the protected area;
 - maintenance of technical means of protection, having the alarm in constant readiness;
 - monitoring of the user's actions
 - proceeding examinations on the facts of violation of safety of the personal data

8. In order to coordinate actions to ensure the security of personal data, ZAO "Zenit-InvestProm" appoints persons responsible for ensuring the security of personal data.