



PERSONAL DATA PROCESSING POLICY OF TCH, JSC IN PERSONAL DATA INFORMATION SYSTEMS OF TCH, JSC

1 General provisions

1.1 Transport Clearing House, Joint Stock Company (hereinafter referred to as JSC TCH, the Company) within the framework of its activities makes the processing of personal data and acts as an operator of personal data with the respective rights and obligations stipulated by Federal Law “On Personal Data” No.152-FZ of 27.07.2006 and other regulatory legal acts of the Russian Federation.

1.2 The TCH’s Policy on personal data processing (hereinafter referred to as the Policy) is developed in accordance with the requirements of Federal Law “On Personal Data” No.152-FZ of 27.07.2006 and sets out the main principles of personal data processing and protection in the Company.

1.3 The present Policy shall be applied to all the processes of personal data processing in the Company and to the Company’s employees taking part in these processes.

1.4 This Policy is to be published on the Company’s official website on the Internet¹.

1.5 The terms and definitions used in this Policy are listed in Table 1.

Table 1 - Terms and definitions

Term	Definition
Automated personal data processing	Processing of personal data by means of computers
Blocking personal data	Temporary termination of personal data processing (except for the cases when processing is needed for updating personal data)
Access to personal data	The possibility of obtaining personal data and the use thereof
Personal data information system	The combination of the personal data contained in databases and the information technologies and hardware allowing to process them
Depersonalisation of personal data	The actions resulting in the impossibility of identifying -- without the use of additional information -- the belonging of personal data to a specific subject of personal data
Processing of personal data	Any action (operation) or a set of actions (operations) realised by means of automation facilities or without such facilities as involving personal data, including the gathering, recording, systematising, accumulating, storing, updating (renewing and altering), retrieving, using, transmitting (disseminating, providing and accessing), depersonalising, blocking, deleting and destroying personal data
Publicly available personal data	The personal data to which access is provided by a subject of personal data to an unlimited group of persons
Operator	A governmental body, a municipal body, a legal entity or a natural person that on its/his/her own or jointly with

¹ <https://www.tch.ru>

Term	Definition
	other persons organises and (or) carries out the processing of personal data, and also defines the purposes of personal data processing, the contents of the personal data which are subject to processing and the actions (operations) involving personal data
Personal data	Any information directly or indirectly concerning a natural person who is defined or is being defined (subject of personal data)
Provision of personal data	The actions aimed at obtaining personal data by a certain group of persons or transmitting personal data to an unlimited group of persons
Dissemination of personal data	The actions aimed at disclosing personal data to an unlimited group of persons
Site on the Internet	The combination of the programs for electronic computers and other information contained in the information system access to which is provided through the information and the telecommunication network "Internet" (the Internet) using domain names and (or) network addresses that allow to identify sites on the Internet
Cross-border transfer of personal data	The transfer of personal data to the territory of a foreign state to a governmental body of the foreign state, to a foreign natural person or a foreign legal entity
Destruction of personal data	The actions resulting in the impossibility of restoring the content of personal data in a personal data information system and (or) resulting in the destruction of personal data material media

2 Rules and principals of personal data processing

2.1 Personal data shall be processed by the Company on a legal and fair basis and shall be limited by the achievement of specific, preset and lawful purposes. The processing of personal data by the Company which is incompatible with the purposes of gathering of personal data is prohibited, as well as the consolidation of databases -- that contain personal data -- when processing of such databases is done for purposes which are mutually incompatible.

2.2 Processing shall involve only the personal data which meet the intended purposes of the processing thereof. The contents and scope of personal data processed by the Company shall correspond to the declared purposes of processing, the data being processed shall not being excessive.

2.3 When personal data are being processed by the Company, the Company shall ensure the correctness of personal data, the sufficiency thereof, and, where necessary, also the feasibility in respect of the purposes of personal data processing. The Company shall take necessary measures (make sure they are taken) to delete or update incomplete or inaccurate personal data.

2.4 The Company shall store personal data in a form allowing to identify a subject of personal data for a term not exceeding the one which is required by the purposes of personal data processing, unless a storage term is established for the personal data by a federal law, a contract to which the subject of personal data is a beneficiary or surety. The personal data being processed shall be destroyed or depersonalised when the purposes of processing are attained or if the need for attaining such purposes is lost, except as otherwise established by a federal law.

2.5 The personal data is processed in accordance with the preset and declared purposes of processing, as well as in accordance with the powers and authorities of the Company stipulated by the existing laws of the Russian Federation and contractual relations with the Company.

2.6 Personal data shall be processed in the Company both with the use of automation facilities in personal data information systems and without such facilities.

2.7 The Company shall not process special categories of personal data.

2.8 The Company is allowed to process the publicly available personal data obtained from publicly accessible sources or upon written consent of a subject of personal data.

2.9 For informational support purposes, publicly accessible sources of personal data (including reference books, address books) may be created in the Company. Publicly accessible sources of personal data may, upon written consent thereto of a subject of personal data, comprise his/her family name, first name, patronymic, job position, email address and other personal data communicated by the subject of personal data.

2.10 The Company shall not process biometric personal data.

2.11 The list of the categories of subjects of personal data processed in the Company, the contents of such personal data and legal grounds for processing are defined in the Company's internal regulatory acts.

2.12 The Company is allowed to transfer personal data to third parties for the purposes of personal data processing when a subject of such personal data gave his/her consent thereto, and in the cases stipulated by the laws of the Russian Federation.

2.13 The Company shall not make cross-border transfer of personal data.

2.14 The Company shall not make any decisions that may have legal implications solely on the basis of the automatic processing of personal data.

2.15 The Company is entitled to delegate processing of personal data to other persons upon the consent of a subject of personal data in accordance with article 6 of Federal Law “On Personal Data” No.152-FZ of 27.07.2006.

2.16 Upon the consent of a subject of personal data, the Company is entitled to entrust another persons with processing of personal data in accordance with article 6 of Federal Law “On Personal Data” No.152-FZ of 27.07.2006.

3 Personal data protection implemented measures

3.1 While processing personal data the Company shall take the necessary legal, organisational and technical measures or make sure they are taken for the purpose of protecting personal data from illegal or accidental access thereto, destruction, modification, blocking, copying, provision and dissemination of the personal data as well as other illegal actions in respect of the personal data.

3.2 Such measures in the Company, in particular, include the following:

- assignment of a person responsible for the organisation of personal data processing;
- internal control over the observance of the Russian Federation legislation on personal data, including the requirements to personal data protection;
- inform the Company's employees of the provisions of the Russian Federation legislation on personal data and internal regulatory acts on the issues of personal data processing and the requirements to personal data protection;
- promulgating the internal regulatory acts related to personal data processing as also the internal regulatory acts establishing procedures aimed at preventing and detecting breaches of the Russian Federation laws;
- detecting levels of the threats to the security of personal data when they are being processed in the personal data information systems;
- using the organisational and technical measures to ensure the security of personal data when they are being processed in personal data information systems;
- using the information protection facilities which have duly passed a conformity assessment procedure with respect to the requirements of the Russian Federation laws on information security;
- assessment of the efficiency of the measures being applied for personal data protection purposes.

4 Interaction with the subjects of personal data

4.1 In the process of its operations, the Company may receive various requests and applications from the subjects of personal data. According to applicable laws, a subject of personal data is entitled to obtain information concerning the processing of his/her personal data.

4.2 The Company shall define the procedure for the registration and handling of the requests from the subjects of personal data with the aim to meet the legislated procedures and timeframes of compiling responses to requests.

4.3 The questions or comments to this Policy, requests for personal data processing in the Company may be addressed at info@tch.ru or 123056, Moscow, B. Grouzinskaya St., 59/1.