

**GARDIA Insurance Company, Joint-Stock Company (GARDIA JSC)**

**Approved by Order No. 1901/24  
of January 19, 2024**

**POLICY**

**on arranging the processing of personal data  
and ensuring their security**

**Moscow, 2024**

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## **1. General provisions**

- 1.1. This Policy on arranging the processing of personal data and ensuring their security (hereinafter, the “Policy”) is approved by GARDIA Insurance Company, Joint-Stock Company (hereinafter, “GARDIA JSC”, the “Operator”) to comply with the requirements of the Russian Federation in the field of processing and ensuring security of personal data.
- 1.2. The Policy is a publicly available document that describes the purposes, legal basis, methods and principles of processing of personal data by GARDIA JSC, its rights and obligations when processing personal data, the rights of personal data subjects, as well as lists the measures applied by GARDIA JSC to ensure security of personal data during their processing.
- 1.3. This Policy applies to all processes of GARDIA JSC related to processing of personal data and is binding on all GARDIA JSC employees processing personal data as part of their official duties.
- 1.4. Prior to processing of personal data, GARDIA JSC informed the authorized body responsible for the protection of rights of personal data subjects on its intention to process personal data. GARDIA JSC registration number in the registry of personal data operators (<https://pd.rkn.gov.ru/operators-registry/operators-list/>): 08-0003803. GARDIA JSC shall in good faith and in due time update information contained in the notice.

## **2. Main terms used in the Policy**

- 2.1. Personal Data (hereinafter, the “PD”) means any information related directly or indirectly to a specific or identifiable individual (personal data subject);
- 2.2. Personal Data Operator (Operator) means a state body, municipal body, legal entity or individual, independently or jointly with other persons organizing and/or processing personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data;
- 2.3. Processing of Personal Data means any action (operation) or set of actions (operations) performed with personal data with or without the use of automation tools. Processing of Personal Data includes, *inter alia*, collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction;
- 2.4. Automated Processing of Personal Data means processing of personal data using computer technology;
- 2.5. Mixed Processing of Personal Data means processing of personal data both with the use of automated tools and without using them;
- 2.6. Dissemination of Personal Data means actions aimed at disclosure of personal data to general public;
- 2.7. Provision of Personal Data means actions aimed at disclosure of personal data to a certain person or general public;
- 2.8. Blocking of Personal Data means temporary termination of processing of personal data (except in cases where processing is required to clarify personal data);
- 2.9. Destruction of Personal Data means actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and/or as a result of which the material carriers of personal data are destroyed;
- 2.10. Depersonalization of Personal Data means actions as a result of which it becomes impossible to determine the belonging of personal data to a specific personal data subject without the use of additional information;
- 2.11. Special Categories of Personal Data means information concerning racial, national origin, political, religious and philosophical beliefs, state of health, intimate life and criminal record;

- 2.12. Biometric Personal Data means information that characterizes the physiological and biological characteristics of a person on the basis of which it is possible to establish his/her identity and which is used by the operator to establish the identity of a personal data subject;
- 2.13. Personal Data Information System (**PDIS**) is a set of personal data contained in databases as well as information technologies and technical means that ensure their processing;
- 2.14. Cross-Border Transfer of Personal Data means transfer of personal data to the territory of a foreign state: to the authority of a foreign state, a foreign individual or a foreign legal entity;
- 2.15. Confidentiality of Personal Data means a restricted access regime including a requirement not to disclose to any third parties and not to disseminate any personal data without the consent of a personal data subject or any other ground pursuant to the current legislation of the Russian Federation.

### **3. Principles of processing of personal data**

- 3.1. In its activity, the Operator ensures compliance with the principles of processing of personal data established by Articles 5 of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" (hereinafter, the "Law on Personal Data"), including:
- processing of personal data on legitimate and fair grounds;
  - limitation of processing of personal data to the achievement of specific, predetermined and legitimate goals and prevention of processing of personal data which is incompatible with the purposes of their collection;
  - prevention of combining databases containing personal data, the processing of which is carried out for incompatible purposes;
  - processing only those personal data that meet the purposes of their processing;
  - ensuring compliance of the content and volume (avoidance of redundancy) of the processed personal data with the stated purposes of processing;
  - ensuring the accuracy of personal data, their sufficiency and relevance in relation to the purposes of processing of personal data; ensuring the acceptance of necessary measures for deletion or destruction of incomplete or inaccurate personal data;
  - storage of personal data is carried out in a form that allows determining the personal data subject, no longer than the purposes of processing of personal data require, unless the period of personal data storage is established by the legislation of the Russian Federation, the contract to which the personal data subject is a party, beneficiary or guarantor;
  - ensuring destruction of personal data upon achievement of processing purposes or in case of loss of the need to achieve these goals, unless otherwise provided for by the federal legislation.

### **4. Rights and obligations of the Operator**

- 4.1. The Operator shall:
- publish the document defining its personal data processing policy and the information on the requirements applied to personal data protection, as well as ensure access to the specified documents with the help of means of corresponding information and telecommunications network, including on the pages of the website belonging to the Operator in the information and telecommunications network (the Internet);
  - appoint the person responsible for the organization of processing of personal data;
  - take measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Law on Personal Data and regulatory legal acts adopted in accordance with it;
  - take necessary legal, organizational and technical measures or ensure the adoption thereof to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions in relation to personal data;

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- when collecting personal data, including by means of information and telecommunications network (the Internet), ensure recording, systematization, accumulation, storage, clarification (update, change), extraction of personal data of citizens of the Russian Federation using databases located in the territory of the Russian Federation (hereinafter, also the “RF”), except for cases stipulated by the legislation;
- before processing personal data received not from the personal data subject, provide the personal data subject with the information pursuant to the legislation on personal data;
- if the provision of personal data and/or the consent for their processing is mandatory in accordance with the legislation of the Russian Federation and the personal data subject refuses to provide his/her personal data and/or give his/her consent to their processing, explain the legal consequences of the refusal to provide such data and/or the consent for their processing;
- when collecting personal data, provide personal data subjects, at their request, with the information in compliance with the legislation on personal data;
- accept and review applications of personal data subjects sent to the addresses indicated on the Operator’s official website in section <https://gardia.sk/contact-us/>, corresponding to the requirements of the Law on Personal Data, thoroughly investigate the violations and take all necessary measures to eliminate the violations without delay and resolve conflicts and disputes in a pre-trial manner;
- at the request of the personal data subject (his/her representative), provide information on the availability of personal data related to the corresponding personal data subject as well as the opportunity to familiarize with such personal data free of charge, and in case of refusal to provide the information, give a motivated refusal within ten business days from the date of receipt of the request of the personal data subject or his/her representative. Should the Operator send to the personal data subject a motivated notice defining the reasons for such prolongation of the requested information provisioning, the specified term could be prolonged but not more than for five business days;
- introduce necessary changes to personal data within seven business days from the date the personal data subject or his/her representative provides information evidencing that the personal data are incomplete, inaccurate or outdated;
- destroy personal data within seven business days from the date the personal data subject or his/her representative provides information evidencing that such personal data are illegally obtained or are not necessary for the stated purpose of their processing;
- fulfill obligations established for operators of personal data in case of receipt from personal data subject a request to stop processing of personal data and/or to revoke consent to their processing;
- perform (or ensure performance) destruction, blocking, deletion of personal data in cases stipulated by the legislation on personal data;
- eliminate violations of the law committed when processing personal data;
- upon the request of an authorized body for the protection of rights of personal data subjects, provide information as well as notify such body on detection of unlawful or accidental transfer of (provision, dissemination, granting access to) personal data resulting in violation of rights of personal data subjects in the procedure and within the term stipulated by
- the legislation on personal data;
- fulfill other obligations stipulated by the legislation on personal data.

4.2. The Operator has the right to:

- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations of the operator of personal data stipulated by the legislation on personal data;
- process personal data of personal data subjects without the consent to such processing in cases stipulated by the RF legislation;
- perform transfer of personal data to third parties as well as entrust the processing of personal data to third parties on the basis of agreements concluded with these persons subject to the availability of corresponding legal grounds and compliance with the requirements;
- refuse a personal data subject to provide information on the processing of his/her personal data in cases stipulated by the legislation on personal data;
- use other rights stipulated by the legislation on personal data.

## **5. Rights of personal data subjects**

The personal data subject has the right to:

- receive information concerning the processing of its personal data by the Operator in the procedure, form and within the term stipulated by the legislation of the Russian Federation on personal data. Note: the right of the data subject to access his/her personal data may be limited by federal laws, including when the processing of personal data is carried out pursuant to the legislation on countering money laundering and combating terrorism, as well as when the access of the data subject to his/her personal data violates the rights and legitimate interests of third parties;
- require the Operator to clarify the personal data of the personal data subject, block or destroy them if the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing;
- take measures provided by law to protect their rights;
- withdraw its consent to the processing of personal data;
- apply to the Operator in order to realize and protect its rights and legitimate interests;
- complain about the unlawful actions or inaction of the Operator to the authorized body for the protection of rights of data subjects or to the court, if the personal data subject believes that the Operator is processing his/her personal data in violation of the Law on Personal Data or otherwise violates his/her rights and freedoms;
- protect its rights and legitimate interests including the right to claim damages and/or compensation for moral damage in court.

## **6. Purposes, categories and a list (volume) of personal data processed, categories of personal data subjects, methods and the term of processing of personal data and their storage**

The Operator processes personal data for the following purposes:

HR records keeping, compliance with the labor, tax, pension, insurance, other applicable RF legislation and other regulatory legal acts (including those containing the requirements for the assessment of qualification and business reputation of the officials, approval of the applicants to the position); promotion of employment, education, career; employee personal security; control over quantity and quality of the works performed; safekeeping of property; rendering assistance in opening accounts and issuing a payment payroll card; provision of taxi services and corporate	<u>Categories of PD subjects:</u> employees; relatives of employees; dismissed employees; executors under civil contracts; members of the board of directors. <u>List of PD processed:</u> surname, name, patronymic; year of birth; date of birth; place of birth; marital status; income; sex; email address; residence address; registration address; phone number; SNILS (Individual Insurance Account Number); TIN; information about citizenship; details of the identity document outside of
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<p>mobile services; issuing powers of attorney; producing business cards; arranging business trips; providing insurance for the employees and their relatives; providing utility vehicles for the employees; execution and performance of civil contracts.</p>	<p>the Russian Federation; the data of the document contained in the birth certificate; bank card details; personal account number; profession; position; employment history (including length of service, information on current employment defining the name and settlement account of the organization); military status; information about military registration; information about education; marriage certificate details; information about knowledge and level of foreign language proficiency; information about degree of relationship; date of registration at residential address; information about ongoing education; information about advanced training; information about professional retraining; information about rewards (awards), honorary titles; information about leaves; information about social benefits; business subdivision; labor agreement details; labor book details; information about the fact and date of labor agreement termination; information about the amount of salary; information about accrued and retained salary; information about accrued and paid insurance payments; information about bonuses; information about recurring payments; information about the amount of supplementary fee; information about aid paid and other compensations; information about valuable prizes and gifts.</p> <p><u>Special categories of PD:</u> health status; criminal records. <u>Methods of processing of PD:</u> mixed.</p> <p><u>Term of processing and storage of PD:</u> term of personal data storage stipulated by the RF legislation, a contract or a consent of a personal data subject to process his/her personal data.</p>
<p>Recruitment of personnel (applicants) to the Operator's vacant positions, labor pool maintenance.</p>	<p><u>Categories of PD subjects:</u> applicants.</p> <p><u>List of PD processed:</u> surname, name, patronymic; year of birth; date of birth; email address; residence address; registration address; phone number; details of the identity document; profession; position; information about education; information about knowledge and level of foreign language proficiency; information about ongoing education; information about advanced training; information about professional retraining; employment history (including the name of previous and current place of employment).</p> <p><u>Methods of processing of PD:</u> mixed.</p> <p><u>Term of processing and storage of PD:</u> term of personal data storage stipulated by a consent of a personal data subject to process his/her personal data.</p>
<p>Provision of insurance and reinsurance services, including:</p> <ul style="list-style-type: none"> <li>- execution, follow-up, performance and termination of insurance (reinsurance) contracts;</li> <li>- claims settlement and insurance claims settlement;</li> </ul>	<p><u>Categories of PD subjects:</u> counterparties; representatives of counterparties; clients; beneficiaries under insurance contracts; legal representatives; representatives of clients; beneficial owners of clients, insured persons.</p>

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<ul style="list-style-type: none"> <li>- execution and performance of contracts with insurance intermediaries;</li> <li>- compliance with the requirements of the legislation on countering the legalization (laundering) of proceeds from crime and financing terrorism;</li> <li>- review and record of the requests of clients and other persons;</li> <li>- organization and performance (individually or through third parties) of external and internal control and audit.</li> </ul>	<p><u>List of PD processed:</u> surname, name, patronymic; date of birth; place of birth; marital status; sex; email address; residence address;</p> <p>registration address; phone number; SNILS (Individual Insurance Account Number); TIN; information about citizenship; details of the identity document; bank card details; settlement account number, personal account number; profession; position; migration card details; details of the document confirming the right to stay (right of residence) in the RF; information about the status of public official; degree of relationship or status of client toward the public official; employer name; information about property.</p> <p><u>Special categories of PD:</u> health status.</p> <p><u>Methods of processing of PD:</u> mixed.</p> <p><u>Term of processing and storage of PD:</u> term of personal data storage stipulated by the RF legislation, a contract or a consent of a personal data subject to process his/her personal data.</p>
<p>General economic activity: drafting, execution and performance of agreements for the supply of goods, performance of works and rendering of services in favor of GARDIA JSC, holding tenders, (potential) counterparties due diligence.</p>	<p><u>Categories of PD subjects:</u> counterparties, representatives of counterparties.</p> <p><u>List of PD processed:</u> surname, name, patronymic; email address; phone number; TIN; settlement account number; position; details of the identity document and other information contained in the document confirming the authority of a signatory on behalf of the counterparty.</p> <p><u>Methods of processing of PD:</u> mixed.</p> <p><u>Term of processing and storage of PD:</u> term of personal data storage stipulated by the RF legislation, a contract or a consent of a personal data subject to process his/her personal data.</p>
<p>Collecting traffic statistics, services personalization and the Operator's website usability maintenance.</p>	<p><u>Categories of PD subjects:</u> visitors of GARDIA JSC website.</p> <p><u>List of PD processed:</u></p> <p>information contained in cookies: information about user session, including, but not limited to: information on visited pages, on page traffic, on user session length, on user actions (shift between site sections and keystrokes);</p> <p>- information about client device (including, but not limited to: information about user browser, user system languages, user supported typefaces, user operation system, user country and region, user's provider, user screen resolution, number of user screen colors, extension number, user device's processor, user device settings, audio and video devices, plugins installed).</p> <p><u>Methods of processing of PD:</u> automated.</p> <p><u>Term of processing and storage of PD:</u> within the term of the use of the Operator's website.</p>



## **7. Legal grounds for processing PD**

7.1. The legal ground for processing personal data is a set of federal laws, laws and regulations accepted on their basis, in pursuance of which and in accordance with which the Operator processes personal data, including:

- (1) Labor Code of the Russian Federation and other regulatory legal acts governing labor relations;
- (2) Tax Code of the Russian Federation;
- (3) Civil Code of the Russian Federation;
- (4) Federal Law No. 208-FZ of December 26, 1995 "On Joint-Stock Companies";
- (5) Federal Law No. 167-FZ of December 15, 2001 "On Compulsory Pension Insurance in the Russian Federation";
- (6) Federal Law No. 27-FZ of April 1, 1996 "On Individual (Personalized) Accounting in the Compulsory Pension Insurance System";
- (7) Federal Law No. 255-FZ of December 29, 2006 "On Compulsory Social Insurance in Case of Temporary Disability and in Connection with Motherhood";
- (8) Federal Law No. 426-FZ of December 28, 2013 "On Special Assessment of Working Conditions";
- (9) Federal Law No. 225-FZ of July 27, 2010 "On Compulsory Insurance of Civil Liability of Hazardous Facility Owner for Causing Harm as Result of Accident at Hazardous Facility";
- (10) Federal Law No. 115-FZ of August 7, 2001 "On Counteracting the Legalization (Laundering) of Proceeds from Crime and Financing of Terrorism";
- (11) Federal Law No. 4015-I "On Organization of Insurance Business in the Russian Federation" of November 27, 1992;
- (12) Decree of the Government of the Russian Federation No. 2464 of December 24, 2021 "On the Procedure for Training in Occupational Safety and Verification of Knowledge of Occupational Safety";
- (13) Decree of the State Statistics Committee of the Russian Federation No. 1 dated January 5, 2004 "On Approval of Unified Forms of Primary Accounting Documentation for Labor Accounting and Compensation";
- (14) Russian Labor Ministry Order No. 223n of April 20, 2022 "On Approval of Regulations on Investigation of Aspects related to Occupational Accident in Separate Industries and Entities, Document Forms, Relevant Classifiers required to investigate Occupational Accidents";
- (15) regulatory legal acts of the Bank of Russia governing the activity of insurance companies;
- (16) regulatory legal acts introducing requirements to documents storage (in particular, Bank of Russia Ordinance No. 4902-U of September 12, 2018 "On the List of Documents to be Protected by Insurers and the Requirements for the Safety of these Documents", Order No. 236 of Rosarchive of December 20, 2019 "On Adopting the List of Standard Management Archive Documents that are Formed as State Authorities, Local Authorities and Companies Carry Out their Activity, and the Storage Periods for such Documents");

7.2. Legal grounds for processing of personal data are also as follows:

- (1) the Charter of GARDIA JSC;
- (2) PD subjects' consent to processing of their PD (in cases not directly stipulated by the RF legislation, however that conform to the Operator's authorities);
- (3) contracts where the party, or beneficiary, or guarantor thereof are PD subjects.

7.3. The Operator also has the right to process personal data if it is required to exercise rights and legitimate interests of the Operator or third parties.

**8. Conditions and procedures for processing of personal data**

- 8.1. Processing of PD by the Operator includes, *inter alia*, collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), blocking, deletion, destruction.
- 8.2. The Operator performs processing of PD with or without the use of automation tools as well as their mixed processing.
- 8.3. When collecting PD, the Operator ensures recording, systematization, accumulation, storage, clarification (update, change), extraction of PD of citizens of the Russian Federation using databases located in the territory of the Russian Federation, except for cases directly stipulated by the legislation of the Russian Federation.
- 8.4. The Operator does not perform processing of biometric personal data.
- 8.5. The Operator does not perform cross-border transfer of personal data.
- 8.6. The Operator has established the following conditions to terminate the processing of PD:
  - (1) achievement of PD processing goals and maximum storage periods;
  - (2) loss of the need to achieve PD processing goals;
  - (3) provision of information by PD subject or his/her legal representative evidencing that such PD are illegally obtained or are not required for the stated purpose of their processing;
  - (4) it is impossible to ensure the legality of the processing of PD;
  - (5) the PD subject withdraws his/her consent to processing of PD, if the storage of PD is no longer required for the purposes of processing PD;
  - (6) expiration of the limitation periods with regard to legal relations where PD are being processed or have been processed.
- 8.7. The Operator performs procession of special categories of PD (including health status) pursuant to the requirements of the current RF legislation, as well as on the basis of written consent of the PD subject. Processing of personal data on criminal record could be performed in cases and in the procedure defined by federal laws.
- 8.8. The Operator collects and processes only those personal data which are required to achieve the purposes stated herein.
- 8.9. The Operator does not make decisions entailing legal consequences with regard to PD subjects or otherwise affecting their rights and legitimate interests on the basis of automated data processing only.
- 8.10. Contracts concluded by the Operator with personal data subjects do not contain any provisions limiting the rights and freedoms of personal data subjects, establishing cases of processing of personal data of minors, unless otherwise required by the legislation of the Russian Federation, as well as any provisions allowing the personal data subjects to omit actions as a condition for the conclusion of the contract.
- 8.11. The Operator has the right to transfer personal data to authorized bodies or third party organizations in accordance with the requirements of the current RF legislation (in particular, the RF labor, tax, insurance legislation, legislation on countering the legalization (laundering) of proceeds from crime and financing terrorism, legislation on auditing activity, on joint-stock companies, on social and pension insurance, on military registration in the RF).
- 8.12. The Operator also has the right to transfer personal data or entrust the processing of personal data to third parties not listed in Clause 8.11 hereof, unless otherwise required by the federal law, on the basis of the consent of the personal data subject and an agreement concluded with such third party defining their confidentiality obligations and data security obligations.

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- 8.13. The Operator has the right to entrust the storage of documents containing, *inter alia*, personal data to a third party on contractual basis.
- 8.14. Term of personal data storage shall be defined with regard to the term of validity of data subject consent to processing as well as the term of validity of contracts the party or beneficiary of which is personal data subject, to limitation periods, to the requirements to documents storage term, other requirements of the legislation of the Russian Federation.

### **9. Measures on proper arranging the processing of PD and ensuring their security**

- 9.1. When processing PD, the Operator takes all necessary legal, organizational and technical measures or ensure the adoption thereof to protect PD from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of PD, as well as from other illegal actions in relation to PD. Personal data security is ensured in the following ways:
- (1) appointment of a person responsible for organization of processing of PD and a person responsible for ensuring security of PD in PDIS;
  - (2) development of local regulatory legal acts of the Operator concerning the processing of personal data and security;
  - (3) carrying out internal control and/or audit of compliance of processing of PD with Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" and the regulatory legal acts adopted in accordance with it, the requirements to PD security, the Operator's local regulations;
  - (4) familiarizing the Operator's employees immediately performing the processing of PD with the provisions of the Russian Federation legislation on PD, including the requirements to PD protection, the Operator's local regulations on data processing and/or training of the specified employees;
  - (5) detecting PD security threats at their processing in PDIS;
  - (6) applying organizational and technical measures to ensure PD security at their processing in PDIS to comply with the requirements to PD protection;
  - (7) assessment of efficiency of the measures applied to ensure PD security before putting PDIS into operation;
  - (8) organization of a security regime for the premises in which PD are processed and/or the Operator's PDIS are located;
  - (9) determining storage locations of material carriers of PD, as well as ensuring the accounting and safety of material carriers of PD;
  - (10) identifying unauthorized access to PD and taking appropriate measures;
  - (11) recovery of PD modified or destroyed due to unauthorized access thereto;
  - (12) establishing the rules for access to PD processed in PDIS as well as ensuring registration and accounting of all actions performed with PD in PDIS;
  - (13) control over the measures taken to ensure PD security and level of protection of PDIS.
- 9.2. The obligations of the Operator's employees performing the processing of PD and protection, and their liability, are defined in the Regulation on arranging the processing of personal data and ensuring their security issued by the Operator.

### **10. Access to the Policy**

- 10.1. The electronic version of the current version of this Policy is posted on the Operator's website at [https://gardia.sk/privacy\\_policy/](https://gardia.sk/privacy_policy/).

**11. Procedure for amending and supplementing the Policy**

- 11.1. The Policy is approved and brought into force by the order of the Operator's senior manager and is valid until canceled.
- 11.2. The Operator has the right to amend the Policy. The amendments are approved by the order of the Operator's senior manager.
  - 11.2.1. The Policy is reviewed as required but at least every three years from the moment of the previous Policy review.
  - 11.2.2. The Policy could be reviewed before the date specified in Clause 11.2.1 hereof, as the following acts being amended:
    - (1) the regulatory legal acts of the Russian Federation on PD;
    - (2) the local regulations and individual acts of the Operator governing the processing and ensuring security of PD;
    - (3) contracts and agreements regulating the legal relations of the Operator with its counterparties and other persons;
    - (4) the procedure for arranging PD processing and ensuring their security by the Operator.

**12. Liability**

- 12.1. Persons who are guilty of violating the norms of processing and protection of PD shall be held liable in accordance with the legislation of the Russian Federation, local regulations of the Operator and contracts regulating legal relations of the Operator with third parties.