

**ADOPTED BY  
THE GENERAL DIRECTOR OF  
PAO "TMK"**

\_\_\_\_\_ (signature) **A.G. Shiryaev**

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**POLICY OF PAO "TMK"  
ON PROCESSING AND PROTECTION OF PERSONAL DATA**

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## **1 General provisions**

- 1.1 Within the compliance with the provisions of the current legislation of the Russian Federation PAO “TMK” (hereinafter referred to as the “Company” or “Operator”) considers implementation of principles of legality, fairness and confidentiality as well the protection of the process itself as its most important tasks during the processing of personal data.
- 1.2 The present Policy on processing and protection of personal data (hereinafter referred to as the “Policy”) has been developed in accordance with the requirements of the Constitution of the Russian Federation, legislative and other statutory acts of the Russian Federation related to personal data.
- 1.3 The Policy stipulates basic principles, objectives, conditions and methods of personal data processing, list of data subjects and categories of the personal data processed by the Company, rights of the personal data subjects as well as the adopted requirements for the protection of the personal data.
- 1.4 The terms used in the present Policy are interpreted in accordance with their definitions provided in the Federal law of the Russian Federation dated 27.07.2006 N152-FZ “On Personal data” (hereinafter referred to as the “Law “On Personal data”).
- 1.5 The Policy is spread on all personal data processed by the Company and is a publicly available document.
- 1.6 The provisions of the Policy serve as basis for the preparation of the internal regulatory acts governing all matters of personal data processing in the Company.

## **2 Principles and legal grounds for personal data processing**

- 2.1 The personal data processing of the Company shall be executed taking into consideration the requirement for the protection of freedom of rights of the employees of the Company and other personal data subjects including the right of inviolability of personal life, private and family secrets basing on the following principles:
  - 2.1.1 The personal data processing shall be conducted on legal and fair grounds.
  - 2.1.2 The personal data processing shall be limited by the achievement of certain determined legal purposes. It is prohibited to process any personal data which is in contradiction with the purpose of collection of such personal data.
  - 2.1.3 It is prohibited to combine the databases containing the personal data, which processing is conducted with the purposes that contradict one to another.
  - 2.1.4 The processing shall be conducted only in respect of the personal data that serves the purpose of their processing.
  - 2.1.5 The contents and volume of the processed personal data shall comply with the announced purpose of the processing. The processed personal data shall not be excessive in relation to the announced purpose of their processing.
  - 2.1.6 During the personal data processing the accuracy of the personal data, their sufficiency and in certain cases their relevance in respect of the purpose of the personal data processing should be provided. The Operator shall take all the necessary measures or arrange such measures in order to delete or clarify insufficient or inaccurate data.
  - 2.1.7 The custody of the personal data shall be conducted in the manner, which allows to determine the personal data subject, during the period not longer that the corresponding purpose of processing requires, in case the term of custody of personal data is not determined by the federal law, agreement, whose party, beneficiary or trustor is a personal data subject.
  - 2.1.8 If otherwise is not provided by the federal law the processed personal data shall be subject to annihilation or anonymization upon achievement of the purpose of processing or in case of loss of necessity to achieve such purpose.

2.2 The Company shall process the personal data in case of presence of at least one of the following conditions (legal grounds):

- 2.2.1 The personal data subject has given his/her consent for the personal data processing.
- 2.2.2 The personal data processing is required for achieving the purpose provided by the international agreement of the Russian Federation or a law, for execution and performance of the functions, rights and obligations of the Operator imposed by the legislation of the Russian Federation.
- 2.2.3 The personal data processing is required for the execution of rights and legal interests of the Company in order to achieve the purpose of a public nature on a condition that rights and freedom of a personal data subject are not violated.
- 2.2.4 The personal data processing is conducted for the statistics or research purposes on a condition of a mandatory anonymization of the personal data.
- 2.2.5 The personal data processing is required for the execution of the agreement whose party, beneficiary or trustor is a personal data subject, as well as for the conclusion of the agreement at the initiative of a personal data subject or an agreement in which the personal data subject shall be a beneficiary or trustor.
- 2.2.6 Other conditions provided by the current legislation of the Russian Federation on personal data.

### **3 Categories of the personal data subjects**

3.1 The Company shall implement the personal data processing of the following categories of the subjects:

- 3.1.1 employees of the Company.
- 3.1.2 employees of the entities that form part of TMK Group.
- 3.1.3 candidates for vacancies.
- 3.1.4 shareholders and members of the Board of Directors of the Company.
- 3.1.5 persons which concluded civil law contracts.
- 3.1.6 representatives of the counterparties (physical persons).
- 3.1.7 visitors of the Company' premises and website of the Company.
- 3.1.8 other personal data subjects (for implementation of the purposes of the personal data processing determined in clause 4.1 of the Policy).

### **4 Purpose and methods of personal data processing**

4.1 The personal data processing shall be conducted with the following purposes:

- 4.1.1 assistance to the employees and candidates during the employment and promotion, quality and quantity control of work, compliance with the provisions of the labour law and other legal acts containing the provisions of the labour law;
- 4.1.2 information support of the Company and other entities that form part of TMK Group, communication assistance between the employees by means of launching of the corporate media as well as implementation of the corporate guidance, portals, mobile application which contains contact and other business information;
- 4.1.3 organization and implementation of trainings, upgrading of qualifications, professional trainings of the employees as well as obtaining of any necessary information from the Company within the frames of the activity of the Corporate University TMK2U;
- 4.1.4 organization and management of business trips of the employees (including assistance in booking of hotels/tickets, visa support);
- 4.1.5 preparation of business cards, taxi service provision, courier service provision;
- 4.1.6 fulfilment of all social obligations of the Company in respect of its employees and their family members (voluntary health insurance, welfare assistance, organization of holiday

- packages, corporate programs of co-financing of the investment part of the state pension, gifts);
- 4.1.7 organization of corporate and sports events;
  - 4.1.8 personal protection and life and health protection of the employees (including by means of the organization of the access control on the facilities of the Company);
  - 4.1.9 conclusion and execution of civil law contracts including service contracts.
  - 4.1.10 compliance with the current legislation of the Russian Federation on joint-stock companies, on disclosure of information;
  - 4.1.11 compliance with the antimonopoly legislation;
  - 4.1.12 compliance with the legislation on securities;
  - 4.1.13 protection of rights and interests of the Company, entities of TMK Group and their officers at courts, dispute settlement bodies, administrative authorities;
  - 4.1.14 preparation of the financial statements or applications, notifications and others to the Pension Fund of the Russian Federation, Social Security Fund of the Russian Federation, Federal Statutory Health Insurance Fund, Federal Tax Service and other state organs and services;
  - 4.1.15 conduction of control and audit inspections of the entities of TMK Group;
  - 4.1.16 obtaining of licenses;
  - 4.1.17 issuance of powers of attorney in favour of the employees of the Company, employees of the entities of TMK Group, other organizations and physical persons;
  - 4.1.18 provision of access control and security measures at the facilities of the Company, provision of protection of other property;
  - 4.1.19 granting to visitors of the Company's website the possibility to contact the Company, to register their requests (inquiries, offers, proposals, comments, claims, gratitude) to the Company as well as implementation of any information support for users of the website.
  - 4.1.20 provision of consulting to visitors of the Company's website on matters related to the services that the Company provides;
  - 4.1.21 organization of participation of the visitors of the Company's website in motivation events meant for building of the brand awareness and the customer loyalty in respect of the Company as well as for the promotion of the services;
  - 4.1.22 provision of corporate information protection and commercial information protection.
  - 4.1.23 fulfilment of other obligations, within the existing legal grounds, listed in clause 2.2 of the Policy.
- 4.2 The personal data processing of the Company shall be conducted using the automated technology including the personal data information system but also without such technology (mixed personal data processing).
- 4.3 At the automated personal data processing the transmission of the personal data by the internal net of the Company and through Internet. shall be done.

## **5 Order and terms of personal data processing**

- 5.1 Only those employees of the Company, who are entitled to process the personal data, can be granted permission for the personal data processing. Such employees shall be entitled to obtain only that personal data that is necessary for the performance of their functions.
- 5.2 The Company shall conduct the personal data processing for organization of the access control in order to provide the personal protection of the employees of the Company and other persons visiting the facilities (buildings, offices, territory) of the Company, as well as for the protection of the property located at such facilities of the Company.
- 5.3 The Company shall conduct the processing of certain special categories of the personal data related to the health of the employees which may affect the possibility to perform their

working functions in accordance with the provisions of the article 10 of the Law “On Personal data”.

- 5.4 The Company shall provide the personal data processing of the citizens of the Russian Federation using the databases located on the territory of the Russian Federation except for those cases directly provided by the legislation of the Russian Federation on personal data.
- 5.5 If otherwise is not provided by the current legislation, the Company shall be entitled to assign the personal data processing to another person with the consent of a data subject, on basis of an agreement concluded with such person.
- 5.6 In the request from the Company (agreement) the list of actions (operations) with the personal data, which shall be conducted by the assigned person, the objective of such processing, obligation of such assigned person to keep the personal data confidential and protect the personal data during its processing, as well as requirements to the protection of the processed personal data shall be determined.
- 5.7 The person that is assigned with the personal data protection on basis of the request from the Company shall not be obliged to obtain any consent from data subjects for the processing of their personal data.
- 5.8 In addition, the Company shall be entitled to transmit the personal data to the bodies of inquiry and investigation, other authorized bodies on grounds provided by the current legislation of the Russian Federation.
- 5.9 The personal data shall be stored during the term which is necessary for the achievement of the purpose for which it has been granted or during the period provided by the legislation. The personal data shall be annihilated upon achievement of that certain purpose/expiration of the term for its processing.

## **6 Personal data protection**

- 6.1 The Company shall take all the necessary legal, organizational and technical measures to protect the personal data from any casual or unauthorized access, annihilation, modification, access blocking or other unauthorized actions. The personal data protection shall be implemented with the following means:
  - a) appointment of a responsible person for the organization of the personal data processing;
  - b) in-house control and/or internal audit of compliance of the personal data processing to the Law “On personal data” and other statutory acts, internal documents of the Company;
  - c) acknowledgement of the employees of the Company, directly processing the personal data with the provisions of the legislation of the Russian Federation on personal data, internal documents of the Company in respect of the personal data processing and training of such employees;
  - d) determination of threats to the security of the personal data during their processing in the personal data information system;
  - e) use of organizational and technical measures for the protection of the personal data during their processing in the personal data information system, necessary for the fulfilment of requirements to the protection of the personal data;
  - f) evaluation of quality of measures taken for the protection of the personal data prior to the launching of the personal data information system;
  - g) registering of personal data medium facilities;
  - h) detection of an unauthorized access to the personal data and taking of corresponding measures;
  - i) restoring the personal data, modified or destroyed as a consequence of an authorized access to it;
  - j) establishment of access to the personal data processed in the personal data information system as well registering and accounting of all actions carried out with the personal data in the personal data information system;

k) control of all measures taken for the protection of the personal data and level of protection of the personal data information system.

## **7 Rights and obligations of personal data subjects**

- 7.1 The personal data subject shall be entitled to obtain all the information related to the processing of his/her personal data by the Company.
- 7.2 The personal data subject shall be entitled to claim from the Operator clarifications of all his/her personal data, its blocking or annihilation in case if the personal data is not full, obsolete, inaccurate, illegally obtained or not necessary for the announced purpose of the processing.
- 7.3 The right of the personal data subject to access his/her personal data can be limited in accordance with the federal laws, including, if the access of the personal data subject to his/her personal data violates the rights and legal interests of the third parties.
- 7.4 For the protection of his/her rights and legal interests the personal data subject shall be entitled to contact the Operator by way of delivery of a corresponding written request at the following address: Pokrovka str., 40, building 2A, Moscow, 106062, Russian Federation.
- 7.5 If in the request (inquiry) of the personal data subject all the required information is not provided in accordance with the provisions of the Law "On personal data" or if the subject does not have the right of access to the requested information, then the Company shall be entitled to forward a reasonable refusal.
- 7.6 The Operator shall review any requests and complaints from the personal data subjects, shall carefully investigate any violation and shall take all the necessary measures for its immediate correction, shall take actions against responsible persons and shall settle any arising disputes in the pre-trial order.
- 7.7 The personal data subject shall be entitled to appeal against any actions or omissions of the Operator by way of addressing his/her complaint to the authorized body for protection of rights of the personal data subject.
- 7.8 The personal data subject shall be entitled to protection of his/her rights and legal interests, including a right of indemnification of any losses and compensation for moral injury by judicial means.
- 7.9 The personal data subject shall be obliged to provide only the accurate data about him/herself.

## **8 Responsibility for violation of terms of personal data processing and personal data protection requirements**

- 8.1 All the employees of the Company involved in the personal data processing shall have disciplinary, civil, administrative and criminal liability in accordance with the current legislation of the Russian Federation for violating the terms of the personal data processing and personal data protection requirements.

## **9 Final provisions**

- 9.1 The present Policy is publicly available and shall be subject to publication on the corporate portal of the Company as well as on the official website of the Company.
- 9.2 The present Policy shall be subject to modification and/or amendment if required, including in case of introduction of any changes in the statutory acts related to the personal data.
- 9.3 All relations with the participation of the Company related to the personal data processing and protection and not regulated by the present Policy shall be governed in accordance with the provisions of the current legislation of the Russian Federation on personal data.