

Joint Stock Company "Research and Design Institute of Urea" (JSC NIIK)

> Appendix No. 1 to JSC NIIK Order dd. June 30, 2025, No.___

POLICY REGARDING PROCESSING AND PROTECTION OF JSC NIIK PERSONAL DATA

Date of Entry _____

Dzerzhinsk 2025



CONTENT

1 Terms and definitions	3
2 General Provisions	5
3 Legal grounds for processing personal data	7
4 Principles of personal data processing	
5 Rights and obligations of the operator	
6 Subjects of personal data	9
7 Rights and obligations of the subject of personal data	
8 Cross-border transfer of personal data	10
9 Terms of processing personal data	
10 Set of persons authorized to process personal data	10
11 Procedure and methods of processing personal data	11
12 Implementation of personal data protection	12
13 Purposes of collecting and processing personal data in society	12
14 Revocation of consent to the processing of personal data	13
15 Responsibility	13
16 Dispute Resolution Procedure	13
17 Contact information	13
Appendix A (mandatory) Revocation of consent to the processing of personal data (form)	sample
Appendix B (mandatory) Purposes of personal data processing, categories personal data and subjects	17



1 Terms and Definitions

No.	Term	Definition
1	Personal data	for the purposes of this Policy, personal data means any information relating to a directly or indirectly identified or identifiable individual (subject of personal data)
2	Confidentiality of personal data	a mandatory requirement for a person who has access to personal data to prevent their dissemination without the consent of the subject of the personal data
3	Personal data operator (Operator, Company)	Joint-Stock Company "Research and Design Institute of Urea" (JSC NIIK) as a legal entity, independently organizing and (or) carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data subject to processing, actions (operations) performed with personal data
4	Subject of personal data (Subject)	an individual defined as a subject of personal data in accordance with the legislation of the Russian Federation and interacting with the Operator to achieve their legitimate goals, with the exception of goals related to the implementation of entrepreneurial activities carried out by this individual in their own interests
5	Provision of personal data	actions of the Subject aimed at disclosing their personal data to JSC NIIK or another specific group of persons
6	Processing of personal data	any action (operation) or set of actions (operations) performed with the use of automation tools or without the use of such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data
7	Consent to the processing of personal data	the decision of the Subject to provide his personal data to the Operator and permission to process them freely, of his own free will and in his own interests. Consent to the processing of personal data may be given by the subject of personal data or his authorized representative in any form that allows confirmation of the fact of its receipt, unless otherwise established by federal law
8	Automated processing of personal data	processing of personal data using computer technology
9	Dissemination of personal data	any actions aimed at disclosing personal data to an indefinite number of persons (transfer of personal data) or familiarizing an unlimited number of persons with personal data, including the publication of personal data in the media, posting in information and telecommunications networks or providing access to personal data in any other way
10	Blocking personal data	temporary suspension of the processing of personal data (except in cases where the processing is necessary to clarify personal data)
11	Depersonalization of personal data	actions as a result of which it is impossible to determine without the use of additional information the ownership of



		personal data by a specific User or other subject of personal data
12	Destruction of personal data	any actions as a result of which personal data are destroyed irrevocably with the impossibility of further restoration of the content of personal data in the personal data information system and (or) the destruction of tangible media of personal data
13	Cross-border transfer of personal data	transfer of personal data to the territory of a foreign state to a foreign government body, foreign individual or foreign legal entity
14	Worker	an individual who is in a legal relationship with JSC NIIK on the basis of an employment contract
15	Applicant	an individual, a candidate applying for a vacant position in the Company, and having declared their desire in one way or another: by sending a resume, by phone call, by personal visit to the Company, as well as an individual included in the Company's personnel reserve
16	Counterparty	an individual who is in legal relations with the Operator's clients and counterparties, on the basis of an employment contract and/or on the basis of another civil law contract and/or power of attorney, as well as performers - individuals who are subjects of personal data, who are in legal relations with the operator under a civil law contract and/or power of attorney
17	User	individuals who are subjects of personal data using the Services owned or otherwise legally owned by JSC NIIK
18	Services	websites, web services, corporate portal, communities and chats in social networks, internet site chats, corporate e- mail, internal electronic information systems, electronic services for personnel electronic document management for applicants and employees . List of the Society's websites: niik.ru; conference.niik.ru
19	Corporate portal	an internet site for authorized users to access internal corporate information, documents and corporate services
20	IP address	a unique network address of a node in a computer network built using the IP protocol, belonging to the subject of personal data.
21	Cookies files	a small piece of service text (a piece of data) transmitted from a website viewed by a visitor to the website visitor's browser for storage. When the same website is visited again, the website visitor's browser sends the previously saved information back. Thanks to cookies, websites are able to remember the actions of the website user, as well as the preferences (language, font size, etc.) of the website visitor, so that there is no need to re-configure them when visiting websites again or when switching between pages of the website.
22	Nickname	fictitious name of the Subject, which is indicated as the name of the Subject as a user of the Service, and is also indicated in the name or username of the Subject's email



	and/or - as the name of the Subject who is a user of a social
	network

The terms and are defined within the framework of this Policy and in accordance with the current legislation of the Russian Federation.

2 General Provisions

2.1 This Policy has been developed and is applied with respect to the processing and protection of personal data of individuals - subjects of personal data (hereinafter referred to as the "Subject") on the basis of Article 24 of the Constitution of the Russian Federation and the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data" (hereinafter referred to as the "federal law on personal data"), establishes the goals, basic principles, rules and legal grounds for the processing of personal data, and also determines the main measures to ensure their security (hereinafter referred to as the "Policy", "Privacy Policy").

The personal data operator is: Joint-Stock Company "Research and Design Institute of Urea" (JSC NIIK, OGRN 1235200032121, INN (Taxpayer Identification Number) 5249181160, address: 606008, Nizhny Novgorod Region, urban district of Dzerzhinsk, Dzerzhinsk, Griboyedov St., 31) (hereinafter referred to as the "Operator", "Company").

2.1.1 This Policy applies to JSC NIIK (OGRN 1235200032121, INN 5249181160, address: 606008, Nizhny Novgorod Region, urban district of Dzerzhinsk, Dzerzhinsk, Griboyedov St., 31) and to third parties to whom personal data of Subjects have been or will be transferred on the basis of an order.

2.1.2 The Policy applies to and is mandatory for compliance and execution by all employees of the Company, as well as other third parties and their employees who, within the framework of contractual relations with the Company, have received access to personal data.

2.1.3 This Policy is the basis for the development of internal local regulations of the Company and third parties that have joined it.

2.1.4 The provisions of this Policy shall be subject to compliance by the Company and third parties that have joined it, from the moment of approval of a similar document, on the basis of an administrative document on the extension of this Policy and/or by virtue of a separate agreement or assignment.

2.1.5 This Policy is a publicly available document and is subject to publication on the official website, other electronic services and in publicly accessible areas of the Company.

2.2 The Policy applies to any personal data and information that may be received by the Company in the course of its activities, including from founders, shareholders, persons who are members of the Company's management bodies, clients, contractors, employees, former employees, applicants, persons included in the Company's personnel reserve and other individuals interacting with the Company to achieve any legal goals, with the exception of goals related to the implementation of entrepreneurial activities by these individuals in their own interests.

The processing of personal data in the Company is carried out in accordance with applicable laws and regulations in the Russian Federation concerning the processing of personal data, in particular, but not limited to:

- Federal Law "On Personal Data" dated July 27, 2006 No. 152-FZ;

- Federal Law "On Communications" dated 07.07.2003 No. 126-FZ;

– Federal Law "On Information, Information Technologies and Information Protection" dated July 27, 2006 No. 149-FZ;

- Labor Code of the Russian Federation;
- other regulatory legal acts in the field of processing and protection of personal data:
 - statutory (constituent) documents of the Company;



this Policy;

other internal local regulatory acts of the Company;

- contracts concluded by the Company;

- consent of personal data subjects to the processing of their personal data.

2.3 The objectives of this Policy are:

 observance by the Company of the rights and freedoms of man and citizen when processing his personal data, including the protection of the rights to privacy, personal and family secrets;

 providing persons providing their personal data with the necessary information to assess what personal data and for what purposes are processed by the Company, what methods of ensuring their security are implemented,

– establishing the basic principles and approaches to the processing and ensuring the security of personal data in the Company.

2.4 The policy ensures the protection of the rights and freedoms of subjects when processing their personal data using automation tools or without using such tools, and also establishes the liability of persons who have access to personal data for failure to comply with the requirements governing the processing and protection of personal data.

2.5 Users, using the services of the Company, services posted on the websites and web services of the Company (hereinafter referred to as the "Site") (list of websites: niik.ru; conference.niik.ru), having communicated their personal data to the Company, including through third parties, acknowledge their consent to the processing of personal data in accordance with this Policy.

2.6 In case of disagreement with this Policy, either in whole or in part, the Subject must refrain from any interaction with the Company, from using the Services and/or visiting the offices and other territories, premises of the Company.

By continuing to use the services, continuing to be on the territory of offices, warehouses, other premises and territories owned or otherwise legally owned by the Company, the Subject, by his/her implicit actions, gives consent to the processing of his/her personal data, except in cases where the current legislation provides for a written form of consent.

2.7 The Company receives and begins processing the personal data of the Subject from the moment of receiving his/her consent. Consent to the processing of personal data may be given by the Subject in any form that allows confirmation of the fact of receiving consent, unless otherwise established by federal law: in writing, orally or in another form stipulated by the current legislation, including through the performance by the Subject of implicative actions when using the services on the Site, using feedback forms and accepting offers containing provisions on the processing of personal data in accordance with the current legislation, as well as in the event of visiting offices and other territories, premises of the Company.

2.8 In the absence of the Subject's consent to the processing of his personal data, such processing shall not be carried out. At the same time, the current legislation of the Russian Federation may provide for the possibility of processing personal data without such consent.

2.9 The Operator collects data about visitors and users (including: IP addresses and other data about the user device and equipment, cookies, the User's Personal Account ID, using Internet statistics services (Yandex Metrica and Google Analytics and others). The specified personal data of users is collected for the purpose of improving the Site, conducting statistical, marketing and other research related to the provision of its personalized services.

2.10 The Company does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, or intimate life.

2.11 The written consent of the Subject to the processing of personal data permitted



for distribution is drawn up separately from other consents to the processing of his personal data and is provided to the Operator directly.

2.12 The Operator has the right to send notifications to the Subject about various events via SMS messages or emails. The Subject can always refuse to receive information messages by sending a letter to the Operator at the email address niik @ niik . ru or other contact information specified in Section 21 of this Policy, marked "Refusal to receive notifications".

2.13 If necessary, the Operator has the right to request documents containing personal data for identification and comparison in the form of originals, copies, digital copies. Identification and comparison of the accuracy of personal using original documents is carried out in the presence of the Subject, after this procedure, the original document is immediately returned to the Subject. If necessary and with the appropriate consent of the Subject, copies, digital copies of documents containing personal data are transferred by the Subject to the Operator for storage.

2.14 Consent to the processing of personal data for the purpose of notification of various events is drawn up in advance and separately from other types of consent to the processing of personal data.

2.15 This Policy may be amended by the Company at any time at its sole discretion without prior notice to the personal data subject. When making changes to the current version, the date of the last update and the version number are indicated. The new version of the Policy comes into force from the moment of its approval and publication on the Company's Website.

2.16 All information collected by third-party services, the transition to which is possible through links on the Company's Website, including by means of communication, is stored and processed by the specified persons (Operators) in accordance with the Privacy Policy. The Subject is obliged to independently familiarize themselves with the specified documents in a timely manner. The Operator is not responsible for the actions of third parties.

2.17 If the Company's service provides for the registration of the Subject in the service's personal account, then authentication in the service is recognized as a simple electronic signature of the subject if it is carried out by entering any of the following combinations of data on the service's web page:

login (user name, nickname) and password (access code);

– confirmation code sent to the subject's personal telephone number;

- confirmation code and/or confirmation link sent to the subject's email.

Consents for the processing of personal data, executed in the personal account using the authentication provided for in this clause of the Policy, are recognized as duly executed written consent of the Subject.

3 Legal grounds for processing personal data

3.1 The Company processes personal data to carry out its activities, promote works and services on the market, provide services, perform works, including to fulfill its duties as an employer.

3.2 The Company processes personal data only if at least one of the following legal grounds exists:

1) the processing of personal data is carried out with the consent of the Subject;

2) the processing of personal data is necessary to achieve the goals provided by law, to implement and fulfill the functions, powers and obligations imposed on the Operator by the legislation of the Russian Federation;

3) the processing of personal data is necessary for the exercise of the rights and legitimate interests of the Company or third parties or for the achievement of socially significant goals, provided that this does not violate the rights and freedoms of the Subject;

4) personal data is processed, access to which by an unlimited number of persons is



provided by the Subject or at his request;

5) personal data subject to publication or mandatory disclosure in accordance with federal law is processed.

3.3 Persons who have gained access to personal data are obliged to maintain confidentiality and not disclose to third parties or distribute personal data without the consent of the subject of the personal data, unless otherwise provided by federal law.

4 Principles of personal data processing

4.1 The principles of processing personal data are:

the legality of the purposes and methods of processing personal data;

good faith;

- the content and volume of personal data processed correspond to the stated purposes of processing, minimization and elimination of redundancy in relation to the stated purposes of their processing;

- the accuracy and sufficiency, and, where necessary, the relevance of personal data in relation to the stated purposes of their processing;

 destruction of personal data upon achieving the purposes of processing in a manner that excludes the possibility of their restoration;

– the inadmissibility of combining databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other.

5 Rights and obligations of the Operator

5.1 The operator has the right:

receive from the Subject reliable information and/or documents containing personal data;

 require the Subject to provide reliable personal data necessary for the execution of the contract, provision of services, identification of the Subject, compliance with the labor legislation of the Russian Federation, as well as in other cases stipulated by the legislation of the Russian Federation;

 independently determine the composition and list of 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, unless otherwise provided by the law on personal data or other federal laws;

 entrust the processing of personal data to another person with the consent of the Subject of personal data;

- in the event of the withdrawal by the Subject of personal data of consent to the processing of personal data, the Operator has the right to continue processing personal data without the consent of the subject of personal data if there are grounds specified in the law on personal data, other federal laws and by-laws.

5.2 The operator is obliged to:

 provide the Subject, at his request, with information concerning the processing of his personal data;

- organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;

- respond to requests and inquiries from Subjects and their legal representatives in accordance with the requirements of the Law on Personal Data;

- to notify the authorized body for the protection of the rights of personal data subjects, at the request of this body, of the necessary information within 10 working days from the date of receipt of such request;

- publish or otherwise provide unlimited access to this Policy regarding the

8



processing of personal data (on websites and other electronic services, on publicly accessible stands and places on the premises of the Company, etc.);

- take legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, leakage, as well as from other illegal actions in relation to personal data;

– comply with the legislation on the localization of personal data on the territory of the Russian Federation;

 stop the transfer (distribution, provision, access) of personal data, stop processing and destroy personal data in the manner and cases stipulated by the Law on Personal Data;

 perform other duties stipulated by the Law on Personal Data and other federal laws.

5.3 The operator also has other rights and bears other obligations established by the federal law on personal data, other federal laws and by-laws.

6 Subjects of personal data

The Company may process personal data of the following categories of subjects:

founders, owners, shareholders, persons included in the management bodies of the Company;

 applicants, candidates for a vacant position of the Company, as well as candidates included in the personnel reserve of the Company;

employees/former employees under an employment contract and their relatives;

performers under a civil law contract;

representatives and employees of both current and potential clients and contractors;

– users of the Company's Service;

- visitors to office, warehouse and other premises and territories of the Company;

– other persons interacting with the Company, citizens and individuals.

7 Rights and obligations of the Subject of personal data

7.1 Subjects of personal data have the right to:

- receive information regarding the processing of their personal data, except for cases stipulated by federal laws. The information is provided to the Subject by the Operator in an accessible form, and it should not contain personal data related to other Subjects, except for cases where there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Law on Personal Data;

 demand that the Operator clarify his personal data, block it or destroy it if the personal data is incomplete, outdated, inaccurate or not necessary for the stated purpose of processing, and also take measures provided by law to protect his rights;

to require prior consent when processing personal data;

- to revoke consent to the processing of personal data (Appendix A to this Policy);

– appeal to the authorized body for the protection of the rights of personal data subjects or in court against the illegal actions or inaction of the Operator when processing his personal data;

- to exercise other rights provided for by the legislation of the Russian Federation.

7.2 Subjects of personal data are obliged to:

provide the Operator with reliable information about yourself;

– inform the Operator about clarification (update, change) of their personal data.

7.3 The subject also has other rights and bears other obligations established by the federal law on personal data, other federal laws and by-laws.



8 Cross-border transfer of personal data

8.1 Before commencing the cross-border transfer of personal data, the operator is obliged to ensure that the foreign state to whose territory the personal data is to be transferred ensures reliable protection of the rights of the subjects of personal data, as well as foreign recipients of personal data: foreign individuals and legal entities.

8.2 Cross-border transfer of personal data to the territory of foreign states that do not meet the above requirements may be carried out only if there is written consent from the subject of personal data to the cross-border transfer of his personal data and/or execution of an agreement to which the subject of personal data is a party.

8.3 When providing services or otherwise interacting with the Company, the Company may carry out cross-border transfer of anonymized personal data solely for the purpose of recording requests and analyzing statistics, and such transfer is carried out using databases located on the territory of the Russian Federation.

8.4 The Subject's consent to cross-border transfer may be included in the text of the consent to the processing of personal data for other purposes, and, if necessary, the Subject gives separate consent to the Operator for the cross-border transfer of his/her personal data.

9 Terms of processing personal data

9.1 The terms of processing personal data are determined based on the purposes of processing in the Company's information systems, in accordance with the term of the contract, agreement with the Subject of personal data or in cases stipulated by law.

9.2 Consent to the processing of personal data is generally valid for 3 (three) years, unless other periods are established. Consent is not assumed to be the purpose of processing personal data or unless otherwise established by the current legislation of the Russian Federation.

9.3 Processed personal data are subject to destruction or depersonalization upon the occurrence of the following conditions:

9.3.1 Achievement of the purposes of processing personal data or maximum storage periods - subject to destruction or depersonalization within 30 days from the date of achieving the purpose of processing personal data;

9.3.2 Loss of the need to achieve the purposes of processing personal data - subject to destruction or depersonalization within 30 days from the date of loss of the need to achieve the purpose of processing personal data;

9.3.3 Provision by the Subject or his legal representative of legal, substantiated and motivated confirmation that personal data are not necessary for the stated purpose of processing - subject to destruction or depersonalization within 7 working days from the date of receipt of such confirmation by the Operator;

9.3.4 Revocation by the Subject or his legal representative of consent to the processing of personal data, if the storage of personal data is no longer required for the purposes of processing personal data, is subject to destruction or depersonalization within 30 days from the date of receipt of such revocation by the Operator (Appendix A to this Policy).

9.4 The Operator has the right to continue processing personal data without the consent of the Subject if there are grounds specified in the law on personal data, other federal laws and regulations.

10. Set of persons authorized to process personal data

10.1 In order to achieve the goals specified in paragraph 2.3 of this Policy, the Company appoints an official responsible for organizing the processing and protection of personal data in the Company, and also allows only those persons to process personal data who are assigned such responsibility on the basis of an administrative document of the



Company in accordance with their official (labor) duties and/or duties arising from a civil law contract.

10.2 Access of other employees may be granted only in cases stipulated by law. The Company requires its employees to maintain confidentiality and ensure the security of personal data when processing them.

10.3 Access to internal corporate information, telephone and other corporate information directories containing personal data of the Company's employees is provided to the Company's employees and contractors under civil law contracts solely for the purpose of communication within the Company.

The basis for providing such access is an employment contract or other civil law contract.

Employees/contractors of the Company are prohibited from transferring personal data of employees/contractors published on internal corporate services to third parties and/or to those who are not employees/contractors of the Company without obtaining the corresponding written consent of the Subject of personal data.

10.4 Personal data may be transferred to third parties for the fulfillment of their contractual obligations, performance of work, delivery of goods, provision of services or for other purposes based on consent to data processing.

Other third parties to whom personal data may be transferred are listed in the text of the consent to the processing of personal data with the mandatory indication of the basis and purpose of the transfer of personal data, the INN of the third party.

10.5 The Company has the right to transfer personal data to third parties in the following cases:

The subject has clearly expressed his consent to such actions;

- The transfer forseen by the agreement concluded between the Operator and the Subject, Russian or other applicable legislation.

10.6 The third party to whom the Operator transfers personal data of the Subjects shall assume the obligations to comply with and implement this Policy and the extent of liability, in relation to the personal data received, to the same extent as if such third party independently acted as the operator in relation to the subject whose data was transferred by the Operator to the third party.

10.7 Personal data shall not be disclosed to third parties or otherwise distributed without the consent of the Subject, unless otherwise provided by the legislation of the Russian Federation or an agreement between the Operator and the Subject.

10.8 At the reasoned request of the authorized body and in accordance with current legislation, the personal data of the Subject may be transferred without his consent:

in connection with the administration of justice in judicial bodies;

- to the police, the Federal Security Service, the prosecutor's office, lawyers, and the Investigative Committee;

 to other bodies and organizations authorized by current legislation and applicable legal norms in cases established in regulatory legal acts that are mandatory for the Operator to execute.

11 Procedure and methods of processing personal data

11.1 In the process of processing personal data, the Company uses automated and non-automated processing of personal data.

11.2 The Company has the right to entrust the processing of personal data to another person with the consent of the Subject, unless otherwise provided by the legislation of the Russian Federation, on the basis of an agreement concluded with this person, a mandatory condition of which is the observance by this person of the principles and rules for the processing of personal data provided for by the Federal Law "On Personal Data".

11.3 In the event of confirmation of the fact of inaccuracy of personal data or illegality



of their processing, the personal data are subject to updating by the Operator, and the processing must be immediately terminated.

12 Implementation of personal data protection

12.1 The Company's activities in processing personal data are inextricably linked to the Company's protection of the confidentiality of this information. All employees of the Company are obliged to ensure the confidentiality of personal data, as well as other information, the list of which is established by the Company.

12.2 The Company ensures the security of processed personal data within the framework of a single comprehensive system of organizational, technical and legal measures to protect information constituting a commercial secret, taking into account the requirements of the legislation on personal data.

12.3 The exchange of personal data during their processing in information systems is carried out through communication channels protected by technical means of information protection.

12.4 When processing personal data in the Company's information systems, the following is ensured:

 compliance with the requirements for the protection of personal data when processing them in the Company's information systems, as provided for by the legislation of the Russian Federation;

 implementation of measures aimed at preventing unauthorized access to personal data and/or their transfer to persons who do not have the right to access such information;

timely detection of unauthorized access to personal data;

– preventing any impact on technical means of automated processing of personal data, which may result in disruption of their functioning;

- the possibility of immediate restoration of personal data modified and destroyed due to unauthorized access to them;

- constant monitoring of the level of protection of personal data;

 appointment of an official responsible for organizing the processing and protection of personal data;

 limiting the composition of persons who have access to personal data and are obliged to fulfill the obligation of non-disclosure of personal data and other confidential information;

 familiarization of the Company's employees who process personal data with the requirements of the Russian Federation legislation on personal data, local acts on issues of processing personal data;

bringing those guilty of violating the rules governing the receipt, processing and protection of personal data, as well as this Policy, to disciplinary, administrative, civil and criminal liability in accordance with the current legislation of the Russian Federation.

13 Purposes of collecting and processing personal data in the Company

13.1 The processing of personal data is limited to achieving specific, predetermined and legitimate purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not permitted.

13.2 The purposes of processing personal data arise, among other things, from the analysis of legal acts regulating the activities of the Operator, the purposes of the activities actually carried out by the Operator, as well as the activities provided for in the constituent documents of the Operator and specific business processes of the Operator in information systems (by structural divisions of the operator and their procedures in relation to certain



categories of personal data subjects).

13.3 The list of purposes of processing personal data in the Company, the composition of personal data and their categories, as well as the categories of subjects of personal data are provided in Appendix B to this Policy.

14 Revocation of consent to the processing of personal data

14.1 The Subject may at any time contact the Organization with a request:

- delete the personal data provided within the timeframes established by law (in the event of the withdrawal of permission by the subject of the personal data);

change or update the data to more reliable ones;

 provide information about the purposes and conditions of processing the provided personal data, and also send in response the provided personal data in a structured form.

The Subject's request must contain a clear indication of the Operator's performance of a specific action, including the revocation of consent to the processing of personal data .

14.2 The withdrawal of consent to the processing of personal data by the Subject or his legal representative, if the storage of personal data is no longer required for the purposes of processing personal data, is the basis for the destruction or depersonalization of personal data within 30 days from the date of receipt of such revocation by the Operator (Appendix A to this Policy).

14.3 In the event that the subject of personal data revokes consent to the processing of personal data, the operator has the right to continue processing personal data without the consent of the subject of personal data if there are grounds specified by current legislation.

14. 4 Any questions regarding the procedure for deleting personal data, revoking consent to the processing of personal data and other issues related to the application of this Policy may be sent to the addresses specified in Section 17 of this Policy.

15 Responsibility

15.1 Persons who have provided the Operator with false information about themselves or information about another personal data subject without the latter's consent shall be liable in accordance with Russian legislation.

15.2 Persons guilty of violating the rules governing the receipt, processing and protection of personal data, and/or guilty of violating the provisions of this Policy shall bear disciplinary, administrative, civil or criminal liability in accordance with the legislation of the Russian Federation.

15.3 Third parties to whom personal data is transferred by the Operator shall bear liability as provided for by the relevant instruction of the Operator and the current legislation of the Russian Federation.

16 Dispute resolution procedure

16.1 Before filing a claim in court regarding disputes arising from the relationship between the Subject and the Operator, it is mandatory to file a claim.

16.2 The recipient of the claim, within 30 (Thirty) calendar days from the date of its receipt, shall notify the claimant in writing of the results of its consideration.

16.3 The parties send each other claim and judicial correspondence by registered mail or courier service with a list of attachments.

16.4 Jurisdiction of the dispute is determined in accordance with the current legislation of the Russian Federation.

17 Contact information

In case of any questions related to the processing of personal data, this Policy,



interested persons have the right to send their request to the e-mail address: niik@niik.ru, as well as by post to JSC NIIK at the address: 606008, Nizhny Novgorod region, Dzerzhinsk, Griboyedov st., 31.



Policy on processing and ensuring protection of personal data of JSC "NIIK"

Attachment A (required) Withdrawal of consent to the processing of personal data (sample form)

то

(name of the legal entity - Operator)

(legal entity address)

from

(surname, first name, patronymic - Subject)

(passport details)

(registration address at place of residence)

(contact phone number)

(e-mail)

STATEMENT

to revoke Consent to the processing of personal data

Ι,

(last name, first name, patronymic in full)

in accordance with Part 2 of Article 9 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data", I revoke my consent to the processing of my personal data by JSC NIIK (OGRN 1235200032121, INN 5249181160, address: 606008, Nizhny Novgorod Region, Dzerzhinsk, Griboyedov Street, 31)

(name, OGRN, INN, address of the legal entity - Operator)

as well as with partners and other third parties to whom the Operator or I personally transferred my personal data, documents, copies of documents containing my personal data,

I request that my personal data, documents, copies of documents containing my personal data be destroyed on all resources and systems of the Operator, including on paper, within the timeframes established by current legislation.

Please notify me of the fact of destruction of my personal data and documents containing personal data at the above-mentioned postal address and e-mail.

signature name

Date: _____



Attachment B

(required) Purposes of personal data processing, categories of personal data and subjects

Nºp /p	Purposes of personal data	Categories of personal data		Categories of personal data
	processing			subjects
		general	Special	
1	Maintaining personnel and accounting records	Last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; marital status; social status; income; gender; email address; residential address; registration address; telephone number; SNILS; INN; citizenship; identity document details; driver's license details; identity document details outside the Russian Federation; document details contained in the birth certificate; bank card details; current account number; personal account number; profession; position; work experience details (including length of service, current employment details indicating the name and current account of the organization); military service status, military registration details; information collected through metric programs; education details; compulsory medical insurance policy details, sample of handwritten signature; electronic signature details (if necessary).	information about the state of health; (in cases stipulated by the legislation of the Russian Federation)	Employees; Relatives of employees; Dismissed employees; Counterparties.
2	Ensuring compliance with the labor legislation of the Russian Federation	Last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; marital status; social status; property status; income; gender; email address; residential address; registration address; telephone number; SNILS; INN; citizenship; identity document details; driver's license details; identity document details outside the Russian Federation; document details contained in the birth certificate; bank card details; current account number; personal account number; profession; position; work experience details (including length of service, current employment details indicating the name and current account of the organization); military service status, military registration details; compulsory medical insurance policy details, sample of handwritten signature; electronic signature details (if necessary).	information about the state of health; (in cases stipulated by the legislation of the Russian Federation)	Employees; Job seekers; Relatives of employees; Dismissed employees
3	Training and professional development of personnel	last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; gender; email address; residential address; registration address; telephone number; SNILS; citizenship; identity document details; profession; position; education details; photo/video image of the face;	-	Workers
4	Preparation, conclusion and	Last name, first name, patronymic; year of birth; month of birth; date of birth; place of	-	Counterparties



№p /p	Purposes of Categories of personal data personal data processing			Categories of personal data subjects	
		processing	general	Special	
	execution of a civil law contract	birth; gender; email address; residential address; registration address; telephone number; SNILS; INN; citizenship; identity document details; driver's license details; identity document details outside the Russian Federation; bank card details; current account number; profession; work experience details (including length of service, current employment details indicating the name and current account of the organization); education details; sample handwritten signature; electronic signature details (if necessary)			
5	Recruitment of personnel (job seekers) and creation of a personnel reserve	Last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; social status; gender; email address; residential address; registration address; telephone number; SNILS; INN; citizenship; identity document details; driver's license details; document details contained in the birth certificate; bank account number; profession; position; information about work experience (including length of service, information about current employment indicating the name and bank account of the organization); attitude to military service, information about military registration; information about education; photo/video image of the face; sample of handwritten signature; electronic signature details (if necessary) disqualifications in the Federal Tax Service database; verification of affiliation with legal entities, verification in the register of nominal directors, database of enforcement proceedings.	information about the state of health; (in cases stipulated by the legislation of the Russian Federation)	Applicants	
6	Creation of a personnel reserve	last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; gender; email address; residential address; registration address; telephone number; SNILS; INN; citizenship; identity document details; profession; education details; photo/video image of the face; sample of handwritten signature; electronic signature details (if necessary)	-	Applicants	
7	Ensuring compliance with the legislation of the Russian Federation on transport security	last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; gender; email address; residential address; registration address; telephone number; SNILS; INN; citizenship; identity document details; driver's license details; position; sample of handwritten signature; electronic signature details (if necessary)	health information (in cases stipulated by the legislation of the Russian Federation)	Employees; Counterparties; Counterparty representatives	
8	Providing access control to the operator's territory	last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; email address; residential address; registration address; telephone number;	-	Employees; Job Seekers; Relatives of Employees;	



Nºp /p				Categories of personal data subjects
		general	Special	
		citizenship; identity document details; driver's license details; position; sample of handwritten signature; electronic signature details (if necessary)		Counterparties; Representatives of Counterparties; Clients
9	Ensuring compliance with the tax legislation of the Russian Federation	last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; income; gender; email address; residential address; registration address; telephone number; SNILS; INN; citizenship; identity document details; bank account number; position; information on work experience (including length of service, information on current employment with the name and bank account of the organization)	-	Employees; Dismissed employees; Counterparties; Clients; Beneficiaries under contracts
10	Ensuring compliance with the pension legislation of the Russian Federation	last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; marital status; income; gender; email address; residential address; registration address; telephone number; SNILS; INN; citizenship; identity document details; document details contained in the birth certificate; bank account number; personal account number; position; work experience details (including length of service, current employment details indicating the name and bank account of the organization); education details;	health information (in cases stipulated by the legislation of the Russian Federation)	Employees; Relatives of employees; Dismissed employees
11	Ensuring compliance with the insurance legislation of the Russian Federation	last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; marital status; income; gender; email address; residential address; registration address; telephone number; SNILS; INN; citizenship; details of the identity document outside the Russian Federation; details of the document contained in the birth certificate; bank card details; current account number; personal account number; position; information on work experience (including length of service, information on current employment with the name and current account of the organization);	health information (in cases stipulated by the legislation of the Russian Federation)	Employees; Relatives of employees; Dismissed employees; Counterparties;
12	Ensuring security related to the Operator's due diligence	last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; gender; email address; residential address; registration address; telephone number; SNILS; INN; citizenship; identity document details; driver's license details; profession; position; information on work experience (including length of service, information on current employment with the name and bank account of the organization); attitude to military service, information on military registration; information on education;	-	Employees; Job Seekers; Counterparties;



Policy on processing and ensuring protection of personal data of JSC "NIIK"

Nºp	Purposes of	Categories of personal data		Categories of
/p	personal data processing			personal data subjects
		general	Special	
13	Voluntary health insurance	last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; gender; email address; residential address; registration address; telephone number; SNILS; INN; citizenship; identity document details; profession; position; information on work experience (including length of service, information on current employment with the name and bank account of the organization); sample of handwritten signature; electronic signature details (if necessary)	-	Workers; Relatives of workers
14	Execution of a judicial act	surname, first name, patronymic; year of birth; month of birth; date of birth; place of birth; marital status; social status; property status; income; gender; e-mail address; residential address; registration address; telephone number; SNILS; INN; citizenship; identity document details; driver's license details; identity document details outside the Russian Federation; document details contained in the birth certificate; bank card details; bank account number; profession; position; work experience details (including length of service, current employment details indicating the name and bank account of the organization); education details.	health information (if applicable)	Employees; Job seekers; Relatives of employees; Dismissed employees; Counterparties; Representatives of counterparties; Clients; Beneficiaries under contracts
15	Improving customer service	last name, first name, patronymic; email address; phone number; social media and messenger accounts	-	Counterparties; Counterparty representatives; Clients; Website visitors
16	Providing information on offered goods, works, services	last name, first name, patronymic; date of birth; email address; phone number; messenger and social network accounts	-	Counterparties; Representatives of Counterparties; Clients;
17	Ensuring compliance with the legislation of the Russian Federation on combating corruption	last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; income; gender; email address; residential address; registration address; telephone number; SNILS; INN; citizenship; identity document details; position; information on work experience (including length of service, information on current employment with the name and bank account of the organization)	-	Employees; Dismissed employees; Counterparties; Representatives of counterparties; Clients; Beneficiaries under contracts



Nºp /p	Purposes of personal data processing	rsonal data		Categories of personal data subjects
		general	Special	
18	Ensuring compliance with the legislation of the Russian Federation on enforcement proceedings	last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; marital status; property status; income; gender; email address; residential address; registration address; telephone number; SNILS; INN; citizenship; details of an identity document outside the Russian Federation; bank card details; current account number; position; information about work experience (including length of service, information about current employment, indicating the name and current account of the organization)	-	Employees; Counterparties; Representatives of Counterparties; Clients; Beneficiaries under Agreements; Other categories of personal data subjects whose personal data are processed; individuals whose rights may be affected in the context of enforcement proceedings
19	Provision of housing for employees and their families	last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; marital status; gender; email address; residential address; registration address; SNILS; INN; citizenship; identity document details; document details contained in the birth certificate; bank account number; position	-	Workers; Relatives of workers
20	Consideration of citizens' appeals	last name, first name, patronymic; date of birth; place of birth; marital status; income; email address; residential address; registration address; SNILS; INN; citizenship; identity document details; position; information on work experience (including length of service, information on current employment with the name and bank account of the organization); information on education	-	Employees; Job seekers; Relatives of employees; Dismissed employees; Counterparties; Representatives of counterparties; Clients; Website visitors; Beneficiaries under contracts; Legal representatives
21	Interaction with contractors, clients	last name, first name, patronymic; date of birth; place of birth; email address; residential address; registration address; phone number; SNILS; INN; citizenship; identity document details; driver's license details; position; social media and messenger accounts; sample of handwritten signature; electronic signature details (if necessary)	-	Employees; Counterparties; Counterparty representatives



Nºp	Purposes of	Policy on processing and ensuring protection of p Categories of personal data		Categories of
/p	personal data processing			personal data subjects
		general	Special	
22	Publication of notices of revocation of power of attorney, issue and revocation of machine-readable power of attorney	last name, first name, patronymic; date of birth; place of birth; email address; residential address; registration address; SNILS; INN; citizenship; identity document details; position;	-	Employees; Dismissed employees; Counterparties; Counterparty representatives
23	Conducting statistical, marketing and other research	information collected through metric programs; data on visitors and users (including: IP addresses and other data on the user device and equipment, cookie files, the User's Personal Account ID, using Internet statistics services (Yandex Metrica, Google Analytics and others)	-	Counterparties; Counterparty representatives; Clients; Website visitors; Personal data subject who has provided consent to the cross-border transfer of personal data
24	Compliance with communications legislation (SIM cards, Internet)	last name, first name, patronymic; date of birth; email address; residential address; registration address; telephone number; citizenship; identity document details; position	-	Workers
25	Sending an employee on a business trip within the Russian Federation and abroad	last name, first name, patronymic; date of birth; email address; residential address; registration address; telephone number; SNILS; INN; citizenship; identity document details; driver's license details; identity document details outside the Russian Federation; bank card details; bank account number; profession; position; work history details (including length of service, current employment details with the organization's name and bank account); sample of handwritten signature; electronic signature details (if necessary), photo	-	Employees; Personal data subject who has provided consent to the cross- border transfer of personal data
26	Ensuring compliance with Russian legislation on countering terrorism	last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; gender; email address; residential address; registration address; telephone number; SNILS; INN; citizenship; identity document details; driver's license details; identity document details outside the Russian Federation; position; sample of handwritten signature; electronic signature details (if necessary)	-	Employees; Job Seekers; Relatives of Employees; Counterparties; Representatives of Counterparties; Clients; Website Visitors; Beneficiaries under Contracts