**PERSONAL DATA PROCESSING POLICY**

This Personal Data Processing Policy (hereinafter referred to as the Policy) defines the basic principles, objectives, and procedure for processing personal data at Fort Telecom (hereinafter referred to as the Company), the rights of personal data subjects, as well as the requirements for personal data protection implemented in the Company.

This Policy was developed in accordance with the Constitution of the Russian Federation, Federal Law No. 152-FZ of July 27, 2006 "On Personal Data", other regulatory and legal acts of the Russian Federation, and the Regulations on Personal Data of Fort Telecom LLC.

In accordance with the Federal Law No. 152-FZ "On Personal Data" of July 27, 2006, the Policy is a public document and must be posted on the Company website.

**1. PURPOSES OF PROCESSING PERSONAL DATA.**

The Company processes personal data in order to:

* ensure compliance with laws or other regulatory legal acts;
* regulate labor relations with employees of the Company (assist employees in employment, training and promotion, monitor the amount and quality of work performed, ensure the safety of the property of company employees, property of the company, pay wages, perform tax agent duties);
* fulfill the requirements of tax authorities concerning financial and economic activities involving high tax risk;
* prepare, conclude, execute and terminate contracts with contractors;
* provide the subjects of personal data, including users of the Company website, with information about the products and services of the Company, the terms of their provision, and other information;
* for other legitimate purposes.

**2. PRINCIPLES OF PROCESSING PERSONAL DATA.**

* The personal data is processed by the Company in a lawful and fair manner.
* The processing of personal data is limited to legitimate objectives defined by this Policy. The Company processes only the personal data corresponding to the purposes of processing; the excessiveness of the personal data processed in relation to the purposes of processing is forbidden.
* Personal data is stored for no longer than it is required by the purpose of processing personal data, unless the period for storing personal data is established by federal law, or the contract to which the beneficiary or the guarantor are subjects of personal data.
* The processing of personal data ensures the accuracy of personal data, their sufficiency, and, if necessary, relevance to the purposes of processing personal data. The Company takes or ensures the necessary measures to remove or clarify incomplete or inaccurate personal data.
* The processed personal data is destroyed or depersonalized upon the achievement of the processing objectives or in case of the loss of the need to achieve these objectives, unless otherwise provided by federal law.
* Personal data are classified as confidential (constituting the Company secrets protected by law) and are subject to protection from unauthorized access and disclosure. Protection of personal data from unauthorized use and/or loss is provided by the Company.

**3. CONDITIONS FOR PROCESSING PERSONAL DATA.**

1. The Company processes personal data of employees and other personal data subjects.
2. The Company receives personal data directly from the subjects of personal data, except in cases where personal data can only be obtained from a third party.
3. The processing of personal data is carried out with the consent of the personal data subject to processing of their personal data. Processing of personal data without consent is carried out only in cases stipulated by the legislation of the Russian Federation.
4. The Company shall not disclose personal data to third parties and shall not distribute personal data without the consent of the personal data subject, unless otherwise provided by federal law.
5. The Company processes personal data in automated and non-automated ways, on paper or electronic media.
6. When collecting personal data, including through the information and telecommunications network (the Internet), the Company provides recording, systematization, accumulation, storage, clarification (updating, modification), extraction of personal data of citizens of the Russian Federation using information resources located in the Russian Federation.
7. Special categories of personal data, including those relating to race, nationality, political views, religious or philosophical beliefs, intimate life, as well as biometric personal data are not processed by the Company.
8. The Company has the right to entrust the processing of personal data to another person with the consent of the personal data subject on the basis of an agreement with this person. The agreement should contain a list of actions (operations) with personal data that will be performed by the person performing personal data processing, processing purposes, the obligation of such person to maintain the confidentiality of personal data and ensure the security of personal data during their processing, as well as the requirements for the protection of the processed personal data in accordance with Article 19 of the Federal Law "On Personal Data" and this Policy.

**4. CONSENT OF THE PERSONAL DATA SUBJECT FOR THE PROCESSING OF PERSONAL DATA.**

The personal data subject makes a decision on the provision of their personal data and gives consent to their processing freely, by their own will and in their interest. Consent to the processing of personal data must be specific, informed and conscious. Consent to the processing of personal data may be given by the personal data subject in any form that allows to confirm the fact of its receipt, unless otherwise provided by federal law.

Consent to the processing of personal data may be withdrawn by the personal data subject. In case of a withdrawal of consent to the processing of personal data by the personal data subject, the Company is entitled to continue processing of personal data without the consent of the personal data subject if there are grounds specified in clauses 2-11 of part 1 of article 6 of the Federal Law “On Personal Data”.

**5. RIGHTS OF THE PERSONAL DATA SUBJECT.**

The personal data subject has the right to:

* + receive complete information about their personal data and the processing of this data;
	+ get access to their personal data and get familiar with them;
	+ withdraw their consent for the processing of personal data;
	+ appeal to the authorized body for the protection of the rights of personal data subjects or in court against the illegal actions or failure to act of the Company in the processing and protection of their personal data.

**6. INFORMATION ON IMPLEMENTED REQUIREMENTS FOR PROTECTION OF PERSONAL DATA.**

In processing personal data, the Company performs the duties stipulated by the Federal Law "On Personal Data".

The Company takes the measures necessary and sufficient to fulfill the obligations stipulated by the Federal Law "On Personal Data" and the regulatory legal acts adopted in accordance with it.

The Company itself determines the list and type of measures necessary and sufficient to fulfill obligations stipulated by the Federal Law "On Personal Data" and the regulatory legal acts adopted in accordance with it, unless otherwise provided by federal laws.

When processing personal data, the Company ensures that the necessary legal, organizational and technical measures are taken to protect personal data from unlawful or accidental access, destruction, alteration, blocking, copying, submission and distribution of personal data, as well as from other illegal actions in relation to personal data.

In order to protect personal data, the Company meets the requirements for the protection of personal data when they are processed in personal data information systems established by the Government of the Russian Federation.

Information about the measures taken by the Company to protect personal data are restricted information.

**CONSENT OF THE WEBSITE VISITOR TO THE PROCESSING OF PERSONAL DATA**

By leaving a request on the website, I give my consent to Fort Telecom LLC (8A, Khrustalnaya street, Perm Russia 614107) to the processing of my personal data, namely, last name, first name, middle name, contact telephone numbers (home/cell/work), email address, place of work and position held, user data (location information), on following conditions:

1. This Consent is given to the processing of personal data, both with and without the use of automation equipment.

2. The purpose of processing personal data is:

* to ensure compliance with laws or other regulatory legal acts;
* to prepare, conclude, execute and terminate contracts with contractors;
* to provide the subjects of personal data, including users of the Company website, with information about the products and services of the Company, the terms of their provision, and other information;
* other legitimate purposes.

3. The basis for the processing of personal data is the Federal Law No. 152-FZ of July 27, 2006 "On Personal Data", other regulatory legal acts of the Russian Federation, as well as the Personal Data Processing Policy.

4. The processing of personal data may include the following actions: collection; record; systematization; accumulation; storage; clarification (updating, modification); extraction; using; deletion; destruction.

5. This consent is also given to the possible transfer of personal data to a third party, UniSender Rus LLC, to which Fort Telecom entrusted the processing of personal data. The transfer of personal data and their processing by a third party is carried out in accordance with the requirements of the Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" and the Personal Data Processing Policy of Fort Telecom LLC.

6. The consent to the processing of personal data may be withdrawn by the personal data subject or their representative by sending a written statement to Fort Telecom LLC at the address indicated at the beginning of this Consent.

7. This Consent is valid from the moment of its signing until the date of withdrawal of the consent submitted in writing.