

Policy on Processing and Protection of Personal Data at Limited Liability Company "Sber Automotive Technologies" (LLC "SberAutoTech")

Terms & Definitions

Personal data security — the state of personal data's protection from illegal actions, characterized by the ability of users, technical means and information systems to ensure confidentiality, integrity and availability of personal data during their processing, regardless of the form of presentation.

Personal Data Information System — a set of personal data contained in databases of personal data and information technology and technical means to ensure their processing.

Counterparty – a Russian or foreign legal entity or individual entrepreneur with whom the Company enters into a contractual relationship, or is in a contractual relationship.

Personal data processing — any action (operation) or a set of actions (operations) performed with or without the use of automation 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.

Personal data — any information relating directly or indirectly to a specific or identifiable individual (the subject of personal data).

The process of processing personal data — the business process of the Company, within which the processing of personal data is carried out.

The subject of personal data — an individual who is directly or indirectly identified or determined using personal data. The subjects of personal data can be clients, representatives of clients, employees of the Company (including former employees of the Company), candidates for employment, employees and representatives of contractors of the Company and other individuals whose personal data is processed in the Company.

The following designations and abbreviations are used in this Policy:

PDIS – personal data information system;

Company – Limited Liability Company "Sber Automotive Technologies" (LLC "SberAutoTech");

PD – personal data;

Policy – Policy on Processing and Protection of Personal Data.

General provisions

In compliance with the requirements of Federal Law No. 152 of 27.07.2006 "On Personal Data", the Labor Code of the Russian Federation, orders of the Federal Service for Technical and Export Control and the Federal Security Service, other legislative acts of the Russian Federation in the field of processing and protection of personal data, as well as internal documents, the Company ensures the legitimacy of processing and security of PD in its activities.

The Company is included in the Register of PD Processing Operators (hereinafter referred to as the "Register. The Register is published on the website of the Federal Service for Supervision of Communications, Information Technology, and Mass Media (Roskomnadzor) on the Internet at: <http://rkn.gov.ru/personal-data/register/>.

Principles of PD processing

The principles of PD processing in the Company are:

- PD processing is carried out on a legal and fair basis;
- PD processing is limited by achieving specific, predetermined and legitimate goals;
- Any processing of PD incompatible with the purposes of collecting PD is not allowed;
- it is not allowed to combine databases containing PD which are processed for incompatible purposes;
- only those PD that correspond to the purposes of this procedure can be processed;
- the content and scope of the processed PD correspond to the stated processing goals. Redundancy of the processed PD in relation to the declared purposes of their processing is not allowed;
- during PD processing, the accuracy of PD is ensured, their sufficiency, and, if necessary, relevance in relation to the purposes of PD processing. Necessary measures are being taken to remove or clarify incomplete or inaccurate PD;
- PD storage is carried out in a form that allows you to determine the subject of PD, no longer than the purposes of PD processing require (if the PD storage period is not established by federal law, consent to PD processing, an agreement to which the PD subject is a party, beneficiary or guarantor);
- Processed PD shall be destroyed or depersonalised when the purposes of the processing have been achieved or when it is no longer necessary to achieve those purposes, unless otherwise provided for by federal law;
- PD processing is not used for the purpose of causing property and/or moral harm to PD subjects, hindering the exercise of their rights and freedoms.

Legal grounds for PD processing

The legal grounds for processing personal data are:

- The Constitution of the Russian Federation;
- The Civil Code of the Russian Federation;

- Labor Code of the Russian Federation;
- Federal Law No. 149 of July 27, 2006 "On Information, Information Technologies and Information Protection";
- other applicable legal acts of the Russian Federation and regulatory documents of public authorities;
- Company Charter;
- local regulations and internal regulations of the Company;
- contracts concluded between the Company and PD subjects;
- the subject's consent to the processing of personal data.

Purposes of PD processing

In accordance with the principles of PD processing, the Company has defined the composition of the processed PD and the purpose of their processing. The composition and purposes of the processing of PD comply with the requirements of the current legislation of the Russian Federation in the field of processing and protection of PD.

During the PD processing, the Company pursues exclusively those goals that were determined before the data collection began. Changes to the purposes are only possible to a limited extent and must be justified and communicated to the data subject.

The Company only processes personal data that is presented in the approved List of Personal Data Processed at LLC "SberAutoTech".

The Company processes the following categories of personal data subjects:

Foreign workers

Purposes of personal data processing	<ul style="list-style-type: none"> • Conclusion, maintenance, modification, termination of employment contracts, which are the basis for the emergence or termination of employment relations between employees and the employer; • Fulfillment of obligations under employment contracts; • Fulfillment by the employer of obligations stipulated by local regulations and employment contracts; • Fulfillment by the employer of obligations stipulated by federal legislation and other regulatory legal acts; • Providing information to government agencies in the Russian Federation; • Providing information requested by government agencies; • Assistance in obtaining social benefits and compensation; • Assisting employees with training and career development; • Provision of business trips, business and personal trips: visas, invitations to enter, purchase of air/train tickets, booking hotels and taxis; • Placing personal data on the Company's website;
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Candidates for vacant positions

Purposes of personal data processing	<ul style="list-style-type: none"> • Reviewing CVs and selecting candidates for vacant positions for further employment; • Maintaining a personnel reserve for the purpose of subsequent employment; • Conducting analytical, statistical research, as well as monitoring in order to form the management and operational reporting of the Company.
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Contractors – individual entrepreneurs

Purposes of personal data processing	<ul style="list-style-type: none"> • Conclusion of a contract to which the subject of personal data is a party or beneficiary or guarantor; • Fulfillment of obligations under an contract to which the personal data subject is a party, beneficiary or guarantor;
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Representatives of legal entities – Contractors

Purposes of personal data processing	<ul style="list-style-type: none"> • Conclusion of a contract to which the personal data subject is a party, beneficiary, guarantor or representative; • The fulfilment of obligations under an contract to which the personal data subject is a party or beneficiary, guarantor or representative;
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Clients – individuals

Purposes of personal data processing	<ul style="list-style-type: none"> • Conclusion of a contract to which the personal data subject is a party, beneficiary, guarantor or representative; • Fulfillment of obligations under an contract to which the personal data subject is a party, beneficiary, guarantor or representative; • Registration and participation in testing of highly automated unmanned vehicles and providing feedback on the quality of the trip;
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Employees of the Company

Purposes of personal data processing	<ul style="list-style-type: none"> • Maintain the contract negotiation process and fulfil contractual requirements with counterparties and clients; • Conclusion, maintenance, modification, termination of employment contracts, which are the grounds for the emergence or termination of employment relations between employees and the employer; • Fulfillment of obligations under employment contracts; • Fulfillment by the employer of obligations stipulated by local regulations and employment contracts; • Fulfillment by the employer of obligations stipulated by federal legislation and other regulatory legal acts; • Providing information on requests from government agencies; • Assistance in obtaining social benefits and compensations; • Supporting employees in training and career development; • Providing for business and personal travel: visas, entry invitations, air/rail tickets, hotel and taxi reservations; • Placing personal data on the Company's website; • Other purposes not prohibited by the current legislation.
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Rules for processing PD

The Company carries out PD processing in the following ways:

- non-automated PD processing;
- automated PD processing;
- mixed PD processing.

PD processing is carried out by the Company on legal grounds. In cases provided for by the current legislation, the Company obtains the consent of the subject to the processing of his or her personal data in accordance with the form established by the current legislation. If a Company receives a PD from a third party, it must necessarily require confirmation that this person has all the necessary grounds for transferring the PD to the Company.

The Company collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distribution, provision, access), depersonalizes, blocks, deletes, destroys PD.

The Company, in the course of its activities, may provide subjects' personal data to third parties only with the consent of the subject himself/herself, except in cases established by Russian federal law or international obligations in their field of application. When transferring PD to third parties, the Company informs the receiving party that the transmitted information contains PD, in respect of which confidentiality requirements must be observed.

In the course of its activities, the Company has the right to entrust the processing of personal data to a third party, unless otherwise provided by applicable law. Confidentiality and security of personal data during their processing, as well as the use of data exclusively for predetermined purposes and volumes, is a prerequisite for assigning the processing of personal data (in the form of a contract or power of attorney) to another person.

Decisions that give rise to legal consequences with respect to the subject of Personal Data or otherwise affect their rights and legitimate interests cannot be made solely on the basis of automated PD processing, unless otherwise provided by the current legislation in the field of personal data protection.

Processing of special categories of personal data in the Company is possible only with the written consent of the PD subject and in other cases provided for by the current legislation in the field of personal data protection.

The Company, in the course of its activities, can process biometric PD (information that characterizes the physiological and biological characteristics of a person, on the basis of which it is possible to establish his identity), only on the basis of the written consent of the PD subject in accordance with the procedure established by the current legislation of the Russian Federation and internal documents of the Company. The Company immediately stops processing biometric personal data to achieve the purposes of their processing, unless otherwise established by the current legislation in the field of personal data protection.

The Company can carry out the cross-border transfer of PD in accordance with the requirements provided by the current legislation of the Russian Federation.

The provision of PD to state and local government bodies, courts, law enforcement agencies, as well as other supervisory authorities is carried out by the Company in cases and in accordance with the procedure provided for by the legislation of the Russian Federation.

The terms of processing of personal data are determined in accordance with:

- the purposes of personal data processing;
- the Order of the Federal Archive of 20.12.2019 No. 236 "On approval of the List of standard administrative archival documents formed in the course of the activities of state bodies, local self-government bodies and organizations, indicating the terms of their storage";
- the contract, the party to which, the beneficiary or the guarantor of which is the subject of personal data;
- the statute of limitations.

Ensuring the accuracy, sufficiency and relevance of PD

During PD processing, accuracy, sufficiency and, if necessary, relevance in relation to the purposes of PD processing must be ensured. The Company assumes that the PD subject has provided accurate, sufficient and up-to-date data. Accuracy, sufficiency and relevance in the PD processing process are achieved by the following methods:

- notification by the PD subject of changes (e.g. by contacting the data subjects through various communication channels);
- identifying inaccuracies, unreliability and following up to clarify data or confirm its accuracy, validity and relevance.

If the Company identifies inaccurate, insufficient or irrelevant PD, the following set of actions is carried out:

- blocking of the PD (only if the identified problem may affect the Company's activities or the rights of the subject during the clarification of the PD), if these actions do not violate the rights and legitimate interests of the PD subject or third parties;
- clarification of the PD, as a result of which the blocking of the PD is removed.

The need to ensure accuracy, sufficiency and relevance arises at the time of the Company's actions, as a result of which the following events may occur:

- submission of incorrect information about the subject to state authorities and local self-government bodies, to extra-budgetary funds, etc.;
- conducting monetary or property transactions with the PD subject (or where the PD subject is the beneficiary), as a result of which the subject receives losses or receives less profit as a result of incorrect information;
- publication or provision of incorrect information about the subject of PD, as a result of which various negative consequences may arise for the subject (moral damage, losses, harm to health, failure to provide timely medical care, lost profits, etc.);
- inaccurate or irrelevant information about the subject may cause losses to the Company;
- other events that in one way or another negatively affect the activities of the PD subject and/or the Company.

If the above events have not occurred at the time of the implementation of these actions, the PD are recognized as accurate, sufficient and relevant.

Rights of personal data subjects

The subject of personal data has the right to receive information regarding the processing of personal data in accordance with Article 14 of Federal Law No. 152 of 27 July 2006 "On Personal Data".

The subject of personal data has the right to demand clarification of personal data, their blocking or destruction if personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, as well as to take measures provided by law to protect their rights.

The subject of personal data has other rights defined by Chapter 3 of the Federal Law "On Personal Data".

Procedure for responding to requests from PD subjects

The Company organizes the processes of interaction with PD subjects in such a way that the subject can contact the Company on all issues stipulated in the legislation related to the processing of his or her PD (information about processed PD, about third parties, requests for clarification, termination of processing, blocking and destruction).

PD subject may contact the Company regarding the processing of their PD in the following cases:

- to obtain information relating to the processing of his or her (the subject's) personal data;
- to clarify, block or delete personal data if it is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;

- to file a complaint about the Company's unlawful processing of his or her (the subject's) personal data;
- to withdraw consent to the processing of personal data.

In accordance with the requirements of Federal Law No. 152 of 27.07.2006 "On Personal Data", the request of a PD subject must contain:

- Full name of the PD subject or his/her legal representative;
- information confirming the data subject's relationship with the Company (contract number, contract date, conditional verbal designation and (or) other information), or information otherwise confirming the fact of PD processing in the Company;
- Details and a copy of the identity document of the Data Subject or his/her legal representative (series, number, date of issue and issuing authority);
- a handwritten or electronic signature depending on the form of the request;
- the essence of the request.

Requests of data subjects or their representatives shall be sent to: Moscow, Andropova Ave. 10A, 115432. Requests signed with an electronic signature may be also sent to the following email address:

privacy@sberautotech.ru

The response to the request is sent to the PD subject or representative within a period not exceeding 10 (ten) working days from the date of the request. The specified period may be extended by 5 (five) working days by sending a reasoned notification to the PD subject or the authorized body indicating the reasons for extending the deadline for submitting the requested information.

In case of refusal to provide information or perform an action reflected in the request, a motivated answer is sent to the subject within a period not exceeding 10 (ten) working days from the date of the request of the PD subject or his/her representative. The answer contains a reference to the provision of Part 8 of Article 14 of Federal Law No. 152 of July 27, 2006 "On Personal Data" or another federal law, which is the basis for such a refusal.

In case of detection of illegal processing of PD or inaccurate PD, the Company ensures the blocking of personal data (including when processing PD by another person acting on behalf of the Company) for the period of verification.

In case of confirmation of the fact of inaccuracy of the PD, the Company provides clarification of the PD (including when processing personal data by another person acting on behalf of the Company), within 7 (seven) working days from the date of submission of such information and removes the blocking of the PD.

If the PD subject withdraws consent to the processing of his/her PD, the Company ensures the destruction of personal data (including when processing PD by a third party acting on behalf of the Company). The destruction of PD is carried out within a period not exceeding 10 (ten) working days from the date of receipt of the specified recall (except in cases of reasoned refusal to revoke consent established by the legislation of the Russian Federation). The specified period may be extended, but not more than 5 (five) working days by sending a reasoned notification to the PD subject. This notification specifies the reasons for extending the deadline for providing the requested information.

Upon expiration of the PD storage periods established in this Policy, the Company ensures the destruction of PD (including when processing PD by a third party acting on behalf of the Company), within a period not exceeding 30 (thirty) days.

If there is no possibility of destruction of personal data within the prescribed period, the Company ensures the blocking of such personal data (including when processing personal data by a third party acting on behalf of the Company), and ensures the destruction of personal data within a period of no more than 6 (six) months, unless another period is established by the legislation of the Russian Federation.

Establishment of rules and procedure for processing PD

The Company's internal documents, which are mandatory for all employees of the Company, as well as partners, contractors and other third parties in the part concerning them, define:

- procedures for granting access to PD;

- procedures for making changes to PD in order to ensure their accuracy, reliability and relevance, including in relation to the purposes of PD processing;
- procedures for the destruction, depersonalization or blocking of PD (if necessary, such procedures);
- procedures for processing appeals of PD subjects (their legal representatives) for cases provided for by law, in particular, the procedure for preparing information on the availability of PD related to a specific PD subject, information necessary to enable the PD subject (his legal representatives) to familiarize himself with his PD, as well as procedures for processing requests for clarification of PD, their blocking or destruction, if the PD is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the established purpose of processing;
- procedures for obtaining the consent of the PD subject to the processing of his/her PD and to transfer the processing of his/her PD to third parties;
- procedures for the transfer of PD between users of the PD processing resource, which provides for the transfer of PD only between employees of the Company who have access to PD;
- procedures for transferring PD to third parties;
- procedures for working with PD material carriers.

The Company may obtain the PD of data subjects by means of data entry forms on the Internet sites, other computer networks (local, global) in accordance with the legislation of the Russian Federation in the field of protection and processing of personal data.

Requirements for confidentiality and security of PD

In order to ensure the safety of PD during processing, the Company implements the requirements of current legislation in the field of processing and ensuring the safety of PD. For these purposes, the Company has a PD protection system that functions and undergoes periodic monitoring.

The Company applies the necessary and sufficient organizational and technical measures, including:

- development of internal documents on the processing of personal data, as well as local acts establishing procedures aimed at preventing and detecting violations of the law, eliminating the consequences of such violations;
- protection of PD from unauthorized access, illegal processing or transfer, as well as from loss, distortion or destruction (regardless of whether automated or non-automated processing of PD is carried out);
- identification and implementation of technical and organizational measures to ensure the protection of PD, focused on the modern level of technical equipment and the necessary degree of data protection before the introduction of new methods of processing PD and new PDIS;
- Identification of threats to the security of PD when processed in PDIS;
- use of information security tools that have passed the conformity assessment procedure;
- establishment of rules for access to PD processed in PDIS, as well as ensuring registration and recording of all actions performed with PD in PDIS;
- monitoring and evaluating the effectiveness of the measures applied (including the involvement of audits);
- detecting unauthorized access to Personal Data (and other Personal Data incidents) and taking action;
- recovery of PD.

In terms of ensuring confidentiality of processing, the Company takes measures aimed at preventing unauthorized collection, processing or use of personal data, including:

- access to PD is provided only in cases and in accordance with the procedure provided for by law;;
- inform the Company's employees directly engaged in the processing of PD with the provisions of the PD legislation, including the requirements for the protection of PD, documents defining the Company's policy regarding the processing of PD, local acts on the processing of PD, and (or) training of these employees.

The Company has employees responsible for organising the processing and security of Personal Data. The Company's management is interested in ensuring the security of Personal Data processed in the performance of the Company's activities, both in terms of applicable legal requirements and in terms of minimising risks.

Final provisions

The Company may make changes to this Policy from time to time without prior notice, and any changes will take effect from the moment they are posted on the Company's website (<https://sberautotech.ru/>) or in the offices of the Company.

Control over the fulfillment of the requirements of this Policy, as well as its timely updating, is carried out by the person responsible for organizing the processing of personal data in the Company. The responsibility of the Company's employees who have access to personal data for non-compliance with the requirements of the norms governing the processing and protection of personal data is determined in accordance with the legislation of the Russian Federation and internal documents of the Company.

Contact information

Any requests concerning the processing of personal data can be sent by e-mail specified in the contacts on the Company's website (<https://sberautotech.ru/>), as well as during a personal visit to the Company's offices or through a letter to the Company's legal address: Moscow, Andropova Ave., 10A, 115432.