

Appendix  
to Order of IDGC of Centre, PJSC  
dated from 25.03.2016 # 91-CA

**The Policy**

**"Processing and protection of personal data in IDGC of Centre, PJSC"**

**P BS 4/11-01/2016**

### Data on the document

Implemented by	Order of IDGC of Centre, PJSC
Business process of the top level	BS 4 "Security"
Recurring inspection	Performed by: – Head of the BS "Security" at least once a year; – Group of internal auditors according to the schedule of checks
Responsible for the procedure	Head of the BS "Security"
Version	No. 1
Modification	Performed by results of application or at change of requirements of normative documents on which basis this Policy is developed
Developed by	Information Security Office
Justification of a new document revision	Introduced for the first time
Participants of the procedure	All employees of IDGC of Centre, PJSC
Method of acquaintance	Against signature
Additional data	

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## 1. General provisions

1.1. This policy "Processing and protection personal data in IDGC of Centre, PJSC (hereinafter — the Policy) it is developed for the purpose of ensuring implementation of requirements of the legislation of the Russian Federation in the field of processing of personal data, discloses the main categories of the personal data processed in IDGC of Centre, PJSC (hereinafter – the Operator), the purposes, methods and principles of processing by the Operator of personal data, the rights and obligations of Operator when processing personal data, the rights of subjects of personal data, and also the list of measures, applied by the Operator for the purpose of the personal data security at their processing.

1.2. The Policy is a public document declaring conceptual bases of activity of the Operator when processing personal data (hereinafter – PPD).

## 2. Normative references

The following legislative and regulating documents are used when developing this Policy:

- Federal Law from 27 July 2006 No. 152-FZ "About personal data";
- the Labour Code of the Russian Federation;
- Order of the Government of the Russian Federation from 01 November 2012 No. 1119 "About the approval of requirements to personal data protection at their processing in information systems of personal data";
- Order of the Government of the Russian Federation from 15 September 2008 No. 687 "About the approval of the Regulations on features of processing of personal data performed without use of automation equipment";
- Order of the Federal Service for Technical and Export Control from 18 February 2013 No. 21 "About the approval of the structure and scope of organizational and technical measures for security of personal data at their processing in information systems of personal data";
- the Articles of Association of IDGC of Centre, PJSC.

## 3. Terms, determinations and abbreviations

3.1. The following terms with the corresponding determinations are used in this Policy:

Term	Determination
Automated processing of personal data	Processing of personal data by means of computer software and hardware
Blocking personal data	Temporary termination of processing of personal data

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	(except for cases when processing is necessary for personal data specification)
Information system of personal data	A set of personal data and information technologies and technical means providing their processing which are contained in databases
Use of personal data	Actions (transactions) with personal data made by the operator for the purpose of decision making or commission of other actions generating legal effects concerning the subject of personal data or other persons or otherwise affecting the rights and freedoms of the subject of personal data or other persons
Operator	A state body, municipal body, legal entity or physical person, independently or together with other persons organizing and (or) performing processing of personal data, and also defining the purposes of personal data processing, structure of the personal data, which are subject to processing, actions (transactions) made with personal data
Processing of personal data	Any action (transaction) or a set of actions (transactions) made with use of automation equipment or without use of such means with personal data including collection, recording, systematization, accumulation, storage, specification (updating, change), extraction, use, transfer (distribution, providing, access), depersonalization, blocking, removal, destruction of personal data
Depersonalization of personal data	Actions as a result of which it becomes impossible without use of additional information to define reference of personal data to the specific subject of personal data
Personal data	Any information relating to directly or indirectly to the defined or being defined natural person (the subject of personal data)
Cross-border transfer of personal data	Transfer of personal data on the territory of the foreign state to authority of the foreign state, a foreign natural person or a foreign legal entity
Destruction of personal data	Actions as a result of which it becomes impossible to recover contents of personal data in the information

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	system of personal data and (or) as a result of which material carriers of personal data are destroyed
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### 3.2. The following abbreviations are used in this Policy:

Abbreviation	Interpretation
152-FZ	Federal Law from 27 July 2006 No. 152-FZ "About Personal Data"
Company	IDGC of Centre, PJSC
PPD	Personal data
PPIS	Information system of personal data
PPDS	System of personal data protection
FZ	Federal law

## 4. Purposes of processing of personal data

4.1. Execution of provisions of regulatory legal acts, specified in section 2 of this Policy.

4.2. Maintaining personnel and financial accounting, salary accrual, recording persons subject to military service, order of plastic cards of employees, providing security of IDGC of Centre, PJSC, accounting of persons performing work under contract agreement, charges of payments under contract agreement, consideration of candidates for compliance with vacant positions in the Company.

4.3. Execution of grid connection and value-added service agreements.

4.4. Others legal purposes.

## 5. Principles of processing of personal data

5.1. Respect for the principles and rules provided by existing legislation.

5.2. Compliance of PPD processing to the purposes which are in advance defined and declared when collecting PPD.

5.3. Compliance of the volume and character of processed PPD, and also methods of PPD processing to the purposes of PPD processing.

5.4. Absence of excessive PPD in relation to stated purposes when collecting PPD.

5.5. Consolidation of databases containing personal data, which processing is performed for the purpose incompatible among themselves, is not allowed.

5.6. The Company does not perform cross-border transfer of PPD.

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## **6. Categories of the processed personal data**

6.1. IDGC of Centre, PJSC processes personal data of the following categories of subjects:

- employees;
- candidates for employment;
- partners;
- consumers of services;
- other subjects of personal data.

The list of the personal data, processed in IDGC of Centre, PJSC and subject to protection, is approved by an internal regulating document of the Operator.

6.2. Processing of special categories of the personal data concerning the racial, national identity, political views, religious or philosophical beliefs, intimate life is not performed in IDGC of Centre, PJSC.

## **7. Sources of receiving personal data**

Obtaining personal data is performed on the basis of documents and information provided personally by employees of the Operator in the course of employment relationships, and also personally by persons signing civil agreements with the Operator, citizens and legal entities, who addressed the Operator in accordance with the established procedure.

## **8. Rights of IDGC of Centre, PJSC when processing personal data**

IDGC of Centre, PJSC as the operator of personal data has the right to:

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8.1. Advocate its interests in court.

8.2. Provide personal data of subjects of PPD to third parties if it is provided by the current legislation of the Russian Federation (tax, law enforcement agencies, etc.).

8.3. Refuse providing personal data in cases, stipulated by the legislation of the Russian Federation.

8.4. Charge processing of PPD to another person with the consent of the subject of PPD unless specified by the federal law, on the basis of the agreement signed with this person, including the public or municipal contract, or by adoption of the relevant act by the state or municipal body (hereinafter - the order of the operator).

8.5. The person performing processing personal data under the order of the Operator is obliged to follow the principles and rules of processing of personal data provided by 152-FZ. The order of the operator shall define the list of actions (transactions) with personal data which will be made by the person performing processing of personal data and the purposes of processing, the duty of such person to observe confidentiality of personal data and to ensure security of personal data at their processing shall be established, and also requirements to protection of the processed personal data shall be specified.

## **9. Duties of IDGC of Centre, PJSC when processing personal data**

IDGC of Centre, PJSC as the operator of personal data is obliged to:

9.1. Take measures necessary and sufficient for ensuring accomplishment of the duties connected with processing of personal data stipulated by the legislation of the Russian Federation.

9.2. Develop, approve and provide unlimited access to the document (to publish in information and telecommunication network) defining its policy for PPD processing.

9.3. Submit documents and local acts of the Operator, concerning processing and protection of PPD, at the request of the authorized body on protection of the rights of subjects of personal data.

9.4. Perform processing of personal data of subjects with respect for the principles and rules provided by existing legislation of the Russian Federation.

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

10.1. The subject of personal data has the right to receiving data on processing of his personal data by the Operator.

10.2. The subject of personal data has the right to demand from the Operator of specification of personal data of the subject of personal data processed by the Operator, their blocking or destruction if the personal data are incomplete,

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outdated, inexact, illegally received or are not necessary for the stated purpose of processing, and also to take the measures for protection of the rights provided by the law.

10.3. The right of the subject of personal data to access his personal data can be limited according to federal laws, including, if:

- processing of personal data, including the personal data obtained as a result of operational search, counterintelligence and intelligence activities is performed for the purpose of defense of the country, security of the state and protection of law and order;

- processing of personal data is performed by the bodies which performed detention of the subject of personal data on suspicion of crime execution, or brought to the subject of personal data charge on criminal case, or applied to the subject of personal data the measure of restraint before bringing a charge except for provided criminally - the procedural legislation of the Russian Federation of cases if acquaintance of the suspect or defendant with such personal data is allowed;

- processing of personal data is performed according to the legislation on counteraction of legalization (laundering) of income obtained in the criminal way and financing of terrorism;

- access for the subject of personal data to his personal data violates the rights and legitimate interests of third parties;

- processing of personal data is performed in cases, stipulated by the legislation the Russian Federation about transport security, for the purpose of ensuring steady and safe functioning of the transport complex, protection of interests of the personality, society and the state in the field of the transport complex from acts of illegal intervention.

10.4. For implementation of the rights and protection of legitimate interests the subject of personal data has the right to address the Operator. The Operator considers any addresses and complaints from subjects of personal data, carefully investigates facts of violations and takes all necessary measures for their immediate elimination, punishment of perpetrators and settlement of disputable and conflict situations in the pre-judicial order.

10.5. The subject of personal data has the right to appeal against actions or failure to act of the Operator by the appeal to the authorized body on protection of the rights of subjects of personal data.

10.6. The subject of personal data has the right of defense of the rights and legitimate interests, including to indemnification and (or) compensation of moral harm judicially.

## 11. Measures for security of personal data at their processing

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11.1. The Operator when processing personal data takes all necessary legal, organizational and technical measures for personal data protection from illegal or accidental access to them, destruction, change, blocking, copying, providing, distribution of personal data, and also from other wrongful acts concerning personal data.

11.2. Security of personal data is reached, in particular, by:

- appointment of a person responsible for the organization of processing of personal data;

- implementation of internal control of compliance of processing of personal data to Federal Law from 27.07.2006 No. 152-FZ "About personal data" and to the regulatory legal acts adopted according to it, requirements to personal data protection to local acts;

- acquaintance of employees of the Operator, who directly perform processing of personal data, with regulations of the legislation of the Russian Federation on personal data, including requirements to personal data protection, local acts concerning processing of personal data, and (or) training of specified employees;

- application of organizational and technical measures for security of personal data at their processing in information systems of personal data necessary for fulfillment of requirements to personal data protection;

- accounting of machine carriers of personal data;

- detection of facts of unauthorized access to personal data and taking measures;

- recovery of personal data modified or destroyed owing to unauthorized access to them;

- control of taken measures for security of personal data.

## 12. Final provisions

12.1. This Policy is an internal document of the Operator, public and is subject to placement on the official site of the Operator.

12.2. This Policy is subject to change, addition in case of new legal acts and special regulating documents for processing and personal data protection, but not more often than once in three years.

12.3. Control of execution of requirements of this Policy is exercised by the person responsible for security of personal data.

12.4. Responsibility of the officials of the Operator having access to personal data for failure to meet requirements of the regulations regulating processing and personal data protection is defined in accordance with the legislation of the Russian Federation and internal documents of the Operator.

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