

**PERSONAL DATA PROCESSING  
POLICY  
BIOSINTEZ, PJSC**

Penza, 2022

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## Terms and Definitions

**Automated processing of personal data** means processing of personal data using computer technology.

**Blocking of personal data** means a temporary suspension of the processing of personal data (except cases when processing is required to clarify personal data).

**Personal data information system** means a set of personal data contained in databases and information technologies and technical means that ensure their processing.

**Personal data blinding** means actions that make it impossible to determine the ownership of personal data by a specific subject of personal data without the use of additional information.

**Processing of personal data** means any action (operation) or a set of actions (operations) performed with personal data with or without automation tools, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), blinding, blocking, deletion, destruction of personal data.

**Operator** means a state authority, municipal authority, legal entity or individual, that independently or jointly with other persons arranges and (or) carries out the processing of personal data, as well as determines the purposes of the processing personal data, the composition of personal data to be processed, the actions (operations) performed with personal data.

**Personal data** means any information related to a directly or indirectly determined or being determined individual (subject of personal data).

**Provision of personal data** means actions aimed at disclosing personal data to a specific person or a certain group of persons.

**Dissemination of personal data** means actions aimed at disclosing personal data to the public.

**Cross-border transfer of personal data** is the transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

**Destruction of personal data** means actions that make it impossible to restore the content of personal data in the information system of personal data and (or) destruction of physical carriers of personal data.

## **1. GENERAL PROVISIONS**

This document defines the Personal Data Processing Policy of Biosintez, PJSC (hereinafter referred to as the “Operator”) and discloses details of the measures taken to ensure the personal data security by the Operator in order to protect the rights and liberties of a person and citizen when processing his/her personal data, including protecting rights to privacy, personal and family secrets.

This Personal Data Processing Policy (hereinafter referred to as the “Policy”) has been developed in accordance with the Constitution of the Russian Federation, Federal Law No. 160-FZ “On Ratification of the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data”, Labor Code of the Russian Federation No. 197-FZ, Federal Law No. 152-FZ “On Personal Data” (hereinafter referred to as FZ-152), other federal laws and by-laws of the Russian Federation that identify the cases and specifics of personal data processing and ensuring the security and confidentiality of this data.

The provisions of this Policy are binding on all employees of the Operator engaged in processing personal data, including those working in branches and separate units of the Operator.

The provisions of this Policy are the basis for arranging personal data processing by the Operator, including the development of internal regulatory documents that regulate processing and protection of personal data by the Operator.

If certain provisions of this Policy contradict to the current legislation on personal data, the provisions of the current legislation shall apply.

Requests of personal data subjects regarding the processing of their personal data by the Operator are accepted at: 4 Druzhby str., 440013, Penza, the Zheleznodorozhnyi district, the Penza region

Also, personal data subjects can send their request to the email address [Biosintez.Info@sunpharma.com](mailto:Biosintez.Info@sunpharma.com).

The term for consideration of requests shall not exceed thirty (30) days from the application date.

This Policy is an unlimited access document. To ensure unrestricted access, the Policy, in particular, is published on the official website of the Operator: [www.biosintez.com/](http://www.biosintez.com/).

## **2. PERSONAL DATA PROCESSING PRINCIPLES AND TERMS**

### **2.1. Principles of personal data processing**

Processing personal data by the Operator is based on the following principles:

- legitimacy and fairness;
- limiting personal data processing to the specific, predetermined and legitimate purposes;
- preventing personal data processing incompatible with the purposes of collecting personal data;
- preventing integration of databases containing personal data processed for incompatible purposes;
- processing those personal data only that meet the purposes of their processing;
- compliance of the content and scope of the personal data processed with the stated purposes of processing;
- preventing processing of personal data that is excessive in relation to the stated purposes of processing;

- ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of personal data processing;
- personal data destruction or blinding when the purposes of processing are achieved or when these purposes became obsolete, when the Operator is not able to eliminate the violations of personal data committed, unless otherwise provided by the federal law.

## **2.2. Requirements for personal data processing**

The operator processes personal data subject to at least one of the following requirements:

- consent of the subject of personal data to processing his/her personal data;
- processing of personal data is required to achieve the purposes stipulated by an international treaty of the Russian Federation or the law, to exercise and fulfill the functions, powers and obligations assigned to the Operator by the legislation of the Russian Federation;
- processing of personal data is required for administration of justice, execution of a judicial act, an act of another authority or official to be executed in accordance with the legislation of the Russian Federation on enforcement proceedings;
- processing of personal data is required to execute an agreement under which the personal data subject is a party or beneficiary or guarantor, as well as to conclude an agreement on the initiative of the personal data subject or an agreement under which the personal data subject is the beneficiary or guarantor;
- processing of personal data is required to exercise rights and legitimate interests of the Operator or third parties or to achieve socially significant goals, provided that the rights and liberties of the subject of personal data are not violated;
- processing of personal data subject to publication or mandatory disclosure in accordance with federal law.

## **2.3. Confidentiality of personal data**

The Operator and other persons who have gained access to personal data shall not disclose to third parties and distribute personal data without the consent of the subject of personal data, unless otherwise provided by the federal law.

## **2.4. Public sources of personal data**

For the purpose of information support, the Operator may create public sources of personal data of subjects, including directories and address books. Public sources of personal data subject to a written consent of the subject of personal data, may include his/her last name, first name, patronymic, date and place of birth, position, contact phone numbers, e-mail address and other personal data reported by the subject of personal data.

Information about the subject of personal data shall be removed from public sources of personal data at any time at the request of the subject of personal data, the authorized authority protecting the rights of subjects of personal data, or by a court decision.

## **2.5. Special categories of personal data**

The Operator is allowed processing special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, health status, intimate life in the following cases:

- the subject of personal data has consented in writing to processing his/her personal data;
- processing of personal data for distribution with the permission of the subject of personal data is allowed subject to limitations and requirements provided for in Article 10.1 of 152-FZ;
- processing of personal data in accordance with the legislation on social safety net, labor legislation, the legislation of the Russian Federation on public retirement income system, and labor pensions;
- processing of personal data required to protect the life, health or other vital interests of the subject of personal data or the life, health or other vital interests of other persons and it is impossible to obtain the consent of the subject of personal data;
- processing of personal data for medical and preventive purposes, in order to establish a medical diagnosis, provide medical and health care and social services, provided that the personal data is processed by a healthcare professional and a person obliged to observe medical privacy in accordance with the legislation of the Russian Federation;
- processing of personal data required to establish or exercise the rights of the subject of personal data or third parties, as well as for the administration of justice;
- processing of personal data in accordance with the legislation on compulsory insurance, insurance legislation.

Processing of personal data of special categories in cases listed in paragraph 4 of Art. 10 of FZ-152, shall be immediately terminated if the purposes of this processing are eliminated, unless otherwise provided by federal laws.

The Operator is allowed processing personal data of criminal record in cases and in accordance with the procedure determined by the federal laws only.

#### **2.6. Biometric personal data**

Operator is allowed processing data that characterizes the physiological and biological characteristics of a person, used as the basis to establish his/her identity (biometric personal data) subject to the writing consent of the subject of personal data only.

#### **2.7. Assigning another person to process personal data**

The Operator is entitled to assign processing of personal data to another person subject to the consent of the subject of personal data, unless otherwise provided by federal law, on the basis of an agreement concluded with this person. The person assigned to process personal data on behalf of the Operator is obliged to comply with the principles and rules for processing of personal data provided for by Federal Law-152 and this Policy.

#### **2.8. Processing of personal data of citizens of the Russian Federation**

The Operator ensures collection, recording, systematization, accumulation, storage, clarification (updating, changing), retrieval of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except for the cases specified in paragraphs 2, 3, 4, 8 of part 1 Art. 6 of FZ-152.

#### **2.9. Cross-border transfer of personal data**

The Operator shall control that the foreign state supposed to receive the personal data transferred ensures adequate protection of the rights of personal data subjects, before the start of this transfer.

Cross-border transfer of personal data to the territory of foreign states that do not provide adequate protection of the rights of personal data subjects is allowed in the following cases:

- writing consent of the subject of personal data to the cross-border transfer of his/her personal data has been obtained;
- execution of an agreement under which the subject of personal data is a party.

### **3. RIGHTS AND OBLIGATIONS**

When processing personal data, the Operator and subjects of personal data have the following rights.

The subject of personal data has the right to:

- obtain information regarding the processing of his/her personal data in accordance with the procedure, form and terms established by the legislation on personal data;
- demand clarification of their personal data, their blocking or destruction if the personal data is incomplete, outdated, inaccurate, illegally obtained, not applicable for the stated purpose of processing or used for purposes not previously declared when the subject of personal data provided his/her consent to processing of personal data;
- take legal measures to protect his/her rights;
- withdraw his/her consent to processing of personal data;
- other rights provided by the legislation on personal data.

The Operator has the right to:

- process personal data of a subject of personal data in accordance with the stated purpose;
- require the subject of personal data to provide reliable personal data required to execute a contract, identify the subject of personal data, as well as in other cases provided for by legislation on personal data;
- limit the access of the subject of personal data to his/her personal data if the access of the subject of personal data to his/her personal data violates the rights and legitimate interests of third parties, as well as in other cases provided for by the legislation of the Russian Federation;
- process personal data authorized by the subject of personal data for distribution, subject to the provisions of Art. 10.1 of 152-FZ;
- process personal data subject to publication or mandatory disclosure in accordance with the legislation of the Russian Federation;
- assign another person to process personal data subject to the consent of the subject of personal data;
- other rights provided by the legislation on personal data.

### **4. ENFORCEMENT OF THE OPERATOR'S OBLIGATIONS AND MEASURES TO PROTECT PERSONAL DATA**

The security of personal data processed by the Operator is ensured by the implementation of legal, organizational and technical measures required to comply with the requirements of the federal legislation on personal data protection.

The Operator shall apply the following organizational and technical measures to prevent unauthorized access to personal data:

- appointment of a person responsible for processing of personal data;
- appointment of persons responsible for measures for ensuring the security of personal data and prevention of unauthorized access to it;
- appointment of a person responsible for ensuring the security of personal data in information systems;
- limiting the persons admitted to process personal data;
- ensuring the subjects read and understand the requirements of federal legislation and regulatory documents of the Operator for processing and protection of personal data;
- arrangement of registration, storage and circulation of carriers containing information with personal data;
- identification of threats to the security of personal data when processing it, generation of threat models on their basis;
- development of a personal data protection system based on the threat model;
- verification of the readiness and performance of data protection tools;
- delimitation of user access to information resources and software and hardware for data processing;
- registration and accounting of user actions of personal data information systems;
- use of anti-viruses and means of restoring personal data protection system;
- use, when applicable, of firewalls, intrusion detection, security analysis and cryptographic information protection;
- arrangement of access control to the Operator's territory, protection of premises with technical devices for processing personal data.

## **5. FINAL PROVISIONS**

Other rights and obligations of the Operator related to personal data processing are determined by the legislation of the Russian Federation on personal data.

The Operator's employees who have committed violation of the rules for personal data processing and protection shall be subjected to financial, disciplinary, administrative, civil or criminal liability in accordance with the procedure established by federal laws.