



Approved  
General Director  
Nevsky Trans LLC  
December 16, 2023

**POLICY**  
**processing of personal data at Nevsky Trans LLC**

Moscow, 2023

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NEVSKY TRANS LLC  
TIN 9721076620 / KPP 772101001  
OGRN 1197746143935  
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<http://www.nevskiytrans.ru>



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## 1. General provisions

- 1.1. The personal data processing policy at Nevsky Trans LLC (hereinafter referred to as the Policy) defines the basic principles, goals, conditions and methods of processing personal data, lists of subjects and processed at Nevsky Trans LLC (TIN9721076620, registered at 109202, Moscow, st. 2nd Karacharovskaya, 1 building 1, room. 19, office 3, hereinafter referred to as the Operator or the Company) of personal data, functions in the processing of personal data, the rights and obligations of the Operator and subjects of personal data, as well as the requirements for the protection of personal data implemented by the Operator.
- 1.2. The policy was developed in accordance with the Federal Law of July 27, 2007 No. 152-FZ "On Personal Data" in order to implement the requirements of the current legislation of the Russian Federation in the field of processing and protection of personal data.
- 1.3. The policy is a publicly available document declaring the conceptual basis for the activities of Nevsky Trans LLC in the processing and protection of personal data.
- 1.4. Basic terms and definitions used in the Operator's local regulations governing the processing of personal data:

<b>Personal data (PD)</b>	Any information relating to a directly or indirectly identified or identifiable individual (subject of personal data).
<b>Automated PD processing</b>	Processing of personal data using computer technology.
<b>Blocking PD</b>	Temporary cessation of processing of personal data (except for cases when processing is necessary to clarify personal data).
<b>Personal Data Information System (PDIS)</b>	The totality of personal data contained in databases and the information technologies and technical means that ensure their processing.
<b>Information</b>	Information (messages, data) regardless of the form of its presentation.
<b>Material information carrier (PDN)</b>	A material object used for fixing and storing speech, sound or visual information (PDN), incl. in transformed form.
<b>PD accumulation</b>	Actions aimed at forming an initial, unsystematized array of personal data.
<b>Manual processing of personal data</b>	Processing of personal data without the help of computer technology.
<b>PD update</b>	Actions aimed at bringing the recorded PD into compliance with the state of the displayed objects of the subject area.
<b>PD processing</b>	Any action (operation) or set of actions (operations) performed using automation tools or without the use of such means with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.
<b>Operator</b>	State body, municipal body, legal entity or individual, independently or jointly with other persons 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 to be processed, actions (operations) performed with personal data data.
<b>Transfer of personal data</b>	Distribution, provision or access to PD.

<b>PD authorized by the subject of personal data for distribution</b>	Personal data, access to which is provided by an unlimited number of persons by the subject of personal data by giving consent to the processing of personal data authorized by the subject of personal data for distribution in the manner prescribed by the current legislation of the Russian Federation.
<b>User</b>	Any visitor to the websites <a href="http://www.nevskiytrans.ru">www.nevskiytrans.ru</a> , <a href="http://www.nevskiytrans.com">www.nevskiytrans.com</a> .
<b>Providing PD</b>	Actions aimed at PD to a specific person or a certain circle of persons.
<b>PD distribution</b>	Actions aimed at disclosing personal data to an indefinite number of persons.
<b>Website</b>	The Operator's website is located at the following Internet address: <a href="http://www.nevskiytrans.ru">www.nevskiytrans.ru</a>
<b>PD collection</b>	Purposeful actions of the operator or third parties specially attracted by the operator for this purpose to receive PD directly from the PD subject or his representative.
<b>Cross-border transfer of personal data</b>	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.
<b>Destruction of PD</b>	Actions as a result of which it becomes impossible to restore the content of PD in the ISPD and (or) as a result of which material media of personal data are destroyed.

## 2. Principles for processing personal data

The organization of processing and protection of personal data in the Company, as well as the implementation of processes in which the processing of personal data is carried out, is carried out taking into account the general principles of processing personal data enshrined in the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data", which are the basis for compliance with the requirements of the Legislation of the Russian Federation, ensuring the confidentiality and security of personal data of Personal Data Subjects, as well as protecting the rights and freedoms of Personal Data Subjects, including protecting the right to privacy, personal and family secrets. Among these principles:

- processing personal data on a legal and fair basis;
- ensuring that the processing of personal data is limited to predetermined and legitimate purposes for the processing of personal data, including preventing the processing of personal data that is incompatible with the purposes of collecting (receiving) personal data;
- processing only those personal data that meet the purposes of processing personal data;
- preventing the merging of databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other;
- ensuring compliance of the content and volume of processed personal data with the stated purposes of processing personal data, including preventing the processing of personal data that is excessive in relation to the stated purposes of their processing;
- ensuring the accuracy of personal data, their sufficiency and, where necessary, relevance in relation to the purposes of processing personal data;
- storage of personal data in a form that makes it possible to identify the Personal Data Subject no longer than required by the purposes of their processing, unless a different period for storing personal data is established by the Legislation of the Russian Federation, an agreement to which the Personal Data Subject is a party, beneficiary or guarantor;

- destruction or ensuring the destruction of personal data (if the processing of personal data is carried out by another person acting on behalf of the Operator), upon achieving the goals of their processing or in the event of the loss of the need to achieve these goals, unless otherwise provided by the legislation of the Russian Federation.

### **3. Legal grounds for processing personal data**

The legal grounds for the processing of personal data, on the basis of which the processing of personal data in the Company is permitted, are:

- Constitution of the Russian Federation;
- Labor Code of the Russian Federation;
- Civil Code of the Russian Federation;
- Tax Code of the Russian Federation;
- Federal Law of June 30, 2003 No. 87-FZ “On transport and forwarding activities”;
- “Rules of transport and forwarding activities”, approved by Decree of the Government of the Russian Federation of September 8, 2006 N 554;
- “The procedure for registration and forms of forwarding documents”, approved by Order of the Ministry of Transport of the Russian Federation dated February 11, 2008 N 23;
- Law of the Russian Federation of April 19, 1991 No. 1032-1 “On employment in the Russian Federation”;
- Federal Law No. 181-FZ “On social protection of disabled people in the Russian Federation”;
- Federal Law of 04/01/1996 No. 27-FZ “On individual (personalized) registration in the compulsory pension insurance system”;
- Federal Law of December 15, 2001 No. 167-FZ “On Compulsory Pension Insurance”;
- Federal Law of November 29, 2010 No. 326-FZ “On Compulsory Health Insurance in the Russian Federation”;
- Federal Law of July 24, 1998 N 125-FZ “On compulsory social insurance against industrial accidents and occupational diseases”;
- Federal Law of July 16, 1999 N 165-FZ “On the fundamentals of compulsory social insurance”;
- Federal Law of December 29, 2006 N 255-FZ “On compulsory social insurance in case of temporary disability and in connection with maternity”;
- Federal Law of December 6, 2011 No. 402-FZ “On Accounting”;
- Federal Law of March 28, 1998 No. 53-FZ “On Military Duty and Military Service”;
- Regulations on military registration, approved by Decree of the Government of the Russian Federation of November 27, 2006 No. 719;
- Federal Law of April 6, 2011 No. 63-FZ “On Electronic Signature”;
- other regulatory legal acts of the Russian Federation and regulatory documents of authorized government bodies, including regulatory relations related to the activities of the Operator;
- Charter of Nevsky Trans LLC;
- an agreement to which the Personal Data Subject is a party or beneficiary or guarantor, if the processing of personal data is necessary to conclude the specified agreement or fulfill obligations under the agreement;
- consent of the Personal Data Subject to the processing of personal data, taking into account the requirements provided for by the Legislation of the Russian Federation for the corresponding category of personal data.

### **4. Purposes of processing personal data, categories and list of personal data processed, categories of subjects whose personal data is processed, methods of processing personal data**

#### **4.1. Organization, provision and regulation of labor and directly related relations (including maintaining personnel, accounting, tax and military records, ensuring working conditions, guarantees and compensation**

**established by the legislation of the Russian Federation, including the implementation of the labor legislation of the Russian Federation and other acts containing labor law norms, social security, ensuring the development of a labor career and job growth, arranging business trips and other business trips, organizing the issuance of bank cards as part of a salary project, making management and personnel decisions, control of the quantity and quality of work performed, ensuring the safety of property)**

4.1.1. Categories and list of personal data:

- personal data: last name, first name, patronymic; year of birth; Month of birth; Date of Birth; Place of Birth; Family status; floor; residence address; registration address; phone number; E-mail address; information contained in the insurance certificate of compulsory pension insurance or a document confirming registration in the individual (personalized) accounting system (SNILS); TIN; citizenship; identity document details (series and number, date of issue, name and code of the issuing authority); driver's license details; information about family composition (last name, first name, patronymic, year of birth, degree of relationship); information about marriage or divorce; information about education; data and details of the education document; information about advanced training; information about knowledge of foreign languages; bank card details; account number; current account number; information on income, expenses and deductions related to work activities; information about work activity (including work experience); profession; job title; Personnel Number; information about social and other benefits; details of documents confirming the right to a tax deduction; insurance experience; details of certificates of incapacity for work; details of the work book; name and details of the document confirming disability; information about the number and age of children; document data contained in the birth certificate of the employee's child; SNILS number of the employee's relative; information about awards and incentives; information on the results of a special assessment of working conditions; attitude towards military service, information about military registration; military specialty, fitness category, military rank, composition (profile), name of the military unit at the place of military registration; information about the place of study (for persons receiving education);
- special categories of personal data: information about health status.

4.1.2. Categories of subjects whose personal data is processed: employees, relatives of employees, dismissed employees, the only participant of the Limited Liability Company "Nevsky Trans".

4.1.3. List of actions: collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (provision, access), blocking, deletion, destruction.

4.1.4. Processing methods: mixed (using automation tools and without using automation tools).

4.1.5. Terms for processing personal data: personal data contained in personal files, in cards of form No. T-2, in employment contracts, agreements on their amendment and termination, in orders for personnel and for core activities, questionnaires, job descriptions, applications, certificates, in individual accounting cards for the amounts of accrued payments and other remunerations and the amounts of accrued insurance premiums, tax accounting registers, and other documents containing personal data of PD subjects specified in clause 4.1.2, are subject to processing, including storage, until the deadline, defined in the current legislation (Federal Law of October 22, 2004 N 125-FZ "On Archiving in the Russian Federation", "List of standard management archival documents generated in the process of activities of state bodies, local governments and organizations, indicating their storage periods", approved by order of the Federal Archive of December 20, 2019 N 236, Article 29 of the Federal Law of December 6, 2011 No. 402-FZ "On Accounting", paragraph 5, paragraph 3 of Article 24 of the Tax Code of the Russian Federation and other regulatory legal acts establishing deadlines storage). If storage periods are not regulated by law, personal data is processed for up to 6 months after termination of the employment contract, or until the conditions specified in clause 5.8 of this Policy occur.

4.1.6. The procedure for destroying personal data for the purpose specified in clause 4.1 is defined in clause 8.8 of this Policy.

## 4.2. Recruitment of personnel (applicants) for vacant operator positions

- 4.2.1. Categories and list of personal data: last name, first name, patronymic; year of birth; Month of birth; Date of Birth; Family status; floor; E-mail address; residence address; registration address; phone number; citizenship; information about work activity (including length of service, data on employment at the current time, indicating the name and current account of the organization); information about education; information about personal knowledge, skills and abilities; information about personal qualities, interests and preferences; information about professional and personal development; information about achievements, merits, promotions and awards; results of professional testing and testing of other business qualities.
- 4.2.2. Categories of subjects whose personal data is processed: applicants to fill vacant positions at Nevsky Trans LLC.
- 4.2.3. List of actions: collection; systematization; accumulation; storage; usage; blocking, deletion, destruction.
- 4.2.4. Processing methods: mixed (with the use of automation tools and without the use of automation tools).
- 4.2.5. Terms for processing personal data: period for making a decision on the applicant's compliance with the requirements for filling a vacant position + 3 months after refusal to hire or sending a job offer, or until the conditions specified in paragraph 5.8 of this Policy.
- 4.2.6. The procedure for destroying personal data for the purpose specified in clause 4.2 is defined in clause 8.8 of this Policy.
- 4.3. Assistance in the performance of labor and official functions (provision for use and (or) official operation of equipment, software and hardware (including personal computers, office equipment, communications equipment, information security equipment), provision for use and (or) official operation of vehicles, monitoring and control of official operation and safety of vehicles, organization and (or) training and advanced training of employees, information support, provision of business cards, organization of corporate events)**
- 4.3.1. Categories and list of personal data:
- personal data: last name, first name, patronymic; year of birth; Month of birth; Date of Birth; Place of Birth; floor; residence address; registration address; phone number; E-mail address; information contained in the insurance certificate of compulsory pension insurance or a document confirming registration in the individual (personalized) accounting system (SNILS); citizenship; identity document details (series and number, date of issue, name and code of the issuing authority); driver's license details; information about education; data and details of the education document; information about advanced training; information about knowledge of foreign languages; bank card details; account number; current account number; profession; job title;
  - special categories of personal data: information about health status.
- 4.3.2. Categories of subjects whose personal data is processed: employees, dismissed employees.
- 4.3.3. List of actions: collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (provision, access), blocking, deletion, destruction.
- 4.3.4. Processing methods: mixed (using automation tools and without using automation tools).
- 4.3.5. Terms for processing personal data: personal data is processed up to 6 months after termination of the employment contract, or upon expiration of the storage periods defined in current legislation, or until the conditions specified in paragraph 5.8 of this Policy.
- 4.3.6. The procedure for destroying personal data for the purpose specified in clause 4.3 is defined in clause 8.8 of this Policy.
- 4.4. Representing the interests of the Company and granting special powers (executing powers of attorney), drawing up and maintaining a register of powers of attorney, checking powers in powers of attorney.**
- 4.4.1. Categories and list of personal data: last name, first name, patronymic, email address, registration address, telephone number, data identity document (series and number, date of issue, name and code of

the issuing authority), position; other information to be included in the power of attorney in accordance with the terms of such power of attorney.

- 4.4.2. Categories of subjects whose personal data is processed: employees, contractors, representatives, counterparties.
  - 4.4.3. List of actions: collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (provision, access), blocking, deletion, destruction.
  - 4.4.4. Processing methods: mixed (with the use of automation tools and without the use of automation tools).
  - 4.4.5. Terms for processing personal data: validity period of the power of attorney +3 years after termination of the power of attorney (to comply with the statute of limitations), or before the conditions specified in paragraph 5.8 of this Policy.
  - 4.4.6. The procedure for destroying personal data for the purpose specified in clause 4.4 is defined in clause 8.8 of this Policy.
- 4.5. Preparation, conclusion and execution of a civil contract**
- 4.5.1. Categories and list of personal data: Full Name; registration address; phone number; E-mail address; TIN; identity document details (series and number, date of issue, name and code of the issuing authority); information contained in the insurance certificate of compulsory pension insurance or a document confirming registration in the individual (personalized) accounting system (SNILS); bank account information (payment details); details (information about the date of conclusion and number) of the civil contract; details (series and number, date of issue, name and code of the issuing authority) of the driver's license; job title; place of work; structural subdivision; address of current place of work.
  - 4.5.2. Categories of subjects whose personal data are processed: individuals performing work or providing services under civil contracts.
  - 4.5.3. List of actions: collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (provision, access), blocking, deletion, destruction.
  - 4.5.4. Processing methods: mixed (with the use of automation tools and without the use of automation tools).
  - 4.5.5. Terms for processing personal data: period of validity of the civil contract with the counterparty + 3 years after termination of the civil contract (to comply with the statute of limitations), or until the conditions specified in paragraph 5.8 of this Policy.
  - 4.5.6. The procedure for destroying personal data for the purpose specified in clause 4.5 is defined in clause 8.8 of this Policy.
- 4.6. The actual implementation of the types of activities provided for by the constituent document, the provision of services to clients and/or potential clients (including interaction on the provision and maintenance of services, contractual work, financial settlements with counterparties and other persons who are not employees, accounting and tax accounting in relation to the actual activities carried out, the acquisition and use of products (goods, works, services) of counterparties, conducting and participating in competitive procurement and posting tender documentation on the relevant trading platforms)**
- 4.6.1. Categories of personal data: Full Name; registration address; phone number; E-mail address; TIN; identity document details (series and number, date of issue, name and code of the issuing authority); information about banking account (payment requisites); information contained in the insurance certificate of compulsory pension insurance or a document confirming registration in the individual (personalized) accounting system (SNILS); details (series and number, date of issue, name and code of the issuing authority) of the driver's license; details (series and number, date of issue, name and code of the issuing authority) of the certificate of state registration of an individual as an individual entrepreneur; place of work; job title; structural subdivision; address of current place of work; details (information about the date of conclusion and number) of the civil contract.
  - 4.6.2. Categories of subjects whose personal data is processed: employees, counterparties, representatives of counterparties, clients, potential clients.

- 4.6.3. List of actions: collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (provision, access), blocking, deletion, destruction.
- 4.6.4. Processing methods: mixed (with the use of automation tools and without the use of automation tools).
- 4.6.5. Terms for processing personal data: the period of validity of the contract with the counterparty + 3 years (to comply with the statute of limitations), or the period of storage of personal data for purpose 4.6 is limited to the period of fulfillment of all obligations, including guarantees, under the concluded agreement with the counterparty + 3 years (to comply with the statute of limitations), or until the expiration of the storage periods defined in the current legislation (Federal Law of October 22, 2004 N 125-FZ "On Archival Affairs in the Russian Federation", "List of standard management archival documents generated in the course of the activities of state bodies, local governments and organizations, indicating their storage periods," approved by Order of the Federal Archive of December 20, 2019 N 236, Article 29 of the Federal Law of December 6, 2011 No. 402-FZ "On Accounting", paragraph 5, paragraph 3 of Article 24 of the Tax Code of the Russian Federation and other regulatory legal acts establishing storage periods), or until the conditions specified in paragraph 5.8 of this Policy.
- 4.6.6. The procedure for destroying personal data for the purpose specified in clause 4.6 is defined in clause 8.8 of this Policy.
- 4.7. Business development, external communications, marketing and promotion of services (carrying out information and (or) organizational interaction with all interested parties (including information support, sending information messages and advertising information, processing incoming requests and information materials of any nature and preparing a response to them), as well as managing the quality and efficiency of such interaction (service); search, identification, analysis of persons potentially interested in cooperation)**
- 4.7.1. Categories of personal data: Full Name; phone number; E-mail address; registration address; address for sending correspondence; job title; place of work; structural subdivision; address of current place of work.
- 4.7.2. Categories of subjects, personal whose data is processed: employees, contractors, representatives of contractors, clients, potential clients.
- 4.7.3. List of actions: collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (provision, access), blocking, deletion, destruction.
- 4.7.4. Processing methods: mixed, with transmission over the internal network of a legal entity, with transmission over the Internet.
- 4.7.5. Term processing: personal data is processed until the consent to the processing of personal data is withdrawn, or until the purpose of processing is achieved, or until the consent to the processing of personal data expires.
- 4.7.6. The procedure for destroying personal data for the purpose specified in clause 4.7 is defined in clause 8.8 of this Policy.

## **5. Procedure, conditions and terms of processing and storage of personal data**

- 5.1. The processing of personal data is carried out by the Operator in accordance with the requirements of the legislation of the Russian Federation. In all cases provided for by the legislation of the Russian Federation, the Company organizes obtaining the consent of the subject of personal data for the processing of his personal data in writing or in another form that allows confirming the fact of its receipt.
- 5.2. The processing of personal data is limited to the achievement of specific, pre-defined and legitimate purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not permitted. Only personal data that meets the purposes of their processing are subject to processing.
- 5.3. Depending on the specific purposes of processing personal data, such processing may include, in particular, performing all or some of the following actions (operations) with personal data: collection (receipt), recording,



systematization, accumulation, storage, clarification (updating, changing ), extraction, use, transfer (distribution, provision, access), blocking, deletion, destruction of personal data.

5.4. For each purpose of processing personal data, the Company has determined:

- relevant categories and list of personal data processed;
- categories of personal data subjects whose personal data is processed by the Operator;
- methods and terms of processing and storage of personal data;
- procedure for destruction of personal data.

5.5. The Processing of biometric personal data and special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, intimate life is not carried out by the Operator.

5.6. Processing of personal data relating to the health status of the Company's employees is permitted only in cases provided for by labor legislation, pension legislation, insurance legislation, labor protection legislation, and defense legislation.

5.7. The terms of processing and storage of personal data for each purpose of personal data processing specified in this Policy are established taking into account compliance with the requirements, including the conditions for the processing of personal data determined by the legislation of the Russian Federation, and/or taking into account the provisions of the agreement in which the party, beneficiary or guarantor is subject of personal data, and/or consent of the subject of personal data to the processing of his personal data, while the processing and storage of personal data is carried out no longer than required by the purposes of processing personal data, unless otherwise established by the legislation of the Russian Federation.

5.8. For all purposes, the processing of personal data by the Operator is terminated in the following cases:

- upon achieving the purpose of their processing or in case of loss of the need to achieve the purpose of processing personal data, unless otherwise provided by the Federal Law "On Personal Data";
- the consent of the personal data subject to the processing of the specified data has expired or been revoked, when the processing of this data is permitted only with consent;
- upon detection of unlawful processing of personal data or receipt of a request to terminate the processing of personal data.

5.9. Processing of personal data in the Company is carried out in the following ways:

- non-automated processing of personal data;
- automated processing of personal data with or without transmission of received information via information and telecommunication networks;
- mixed processing of personal data.

5.10. The Operator receives the processed personal data directly from the subject of the personal data. Receipt by the Operator of personal data from third parties and/or transfer (provision, access) of personal data to third parties is permitted only with the consent of the subject of personal data to the processing of personal data or if there are other grounds provided for by the legislation of the Russian Federation.

5.11. The transfer of personal data to state authorities and institutions, municipal authorities, state extra-budgetary funds, as well as the receipt of personal data from state authorities and institutions, municipal authorities, state extra-budgetary funds is permitted in the absence of the consent of the subject of personal data to the processing of his personal data in the manner and in cases provided for by the legislation of the Russian Federation.

5.12. The operator has the right to entrust the processing of personal data to another person with the consent of the subject of personal data on the basis of an agreement concluded with this person. The agreement must contain a list of actions (operations) with personal data that will be performed by the person processing personal data, the purposes of processing, 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 requirements for the protection of processed personal data in accordance with Art. 19 of the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data".

The involvement of third parties in the processing of personal data can be carried out only if such persons process personal data in the minimum required composition and solely to achieve the purposes of processing personal data provided for in this Policy.

If the Operator entrusts the processing of personal data to another person, the Operator is responsible to the subject of personal data for the actions of the specified person. The person processing personal data on behalf of the Operator is responsible to the Operator.

5.13. The Company does not carry out actions aimed at disclosing personal data to an indefinite number of persons (i.e., the distribution of personal data is not carried out).

5.14. When collecting personal data, including through the information and telecommunications network Internet, the Operator ensures 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, for except in cases specified in the Personal Data Law.

5.15. The operator does not make decisions that give rise to legal consequences in relation to the subjects of personal data or otherwise affect their rights and legitimate interests, based solely on automated processing of their personal data.

## **6. Features of processing personal data on the Operator's website**

6.1. In order to provide the user with the functionality of the Operator's Website [www.nevskiytrans.ru](http://www.nevskiytrans.ru) and services implemented on the Site, carrying out information and (or) organizational interaction with all users, including consulting services and the formation of personalized and/or relevant offers of services and services, the Operator processes the following personal data of Site users, which the user provides by filling out the feedback form :

- Full Name;
- E-mail address;
- phone number;
- other data that the user considers necessary to provide in the text of the application for cooperation.

6.2. During the processing of personal data, the following actions may be performed: collection; record; systematization; accumulation; storage; clarification (update, change); extraction; usage; transfer (provision, access); blocking; deletion; destruction.

6.3. The personal data processed for this purpose does not belong to special categories or biometric personal data and is processed in an automated way.

6.4. The specified personal data is stored for 30 days after the termination of communication or the withdrawal by the subject of personal data of his consent to the processing of personal data.

6.5. Personal data is destroyed by deleting it from the operator's information systems using built-in information system tools.

6.6. The Operator's Website uses technology for collecting and processing cookies. Cookies are small files that are created and stored by the Website user's browser. Cookies are stored on the device for a certain period of

time and allow a website to recognize the user's device, remember the user's browsing session, or store some of the user's settings and preferences specific to that site. Processing these cookies is necessary for the Operator to ensure the correct operation of the Site, improve the efficiency and ease of use of the Site.

6.7. By default, most browsers are configured to accept cookies. Users of the Site can delete cookies from their device at any time through the settings of the browser used. Users may also refuse cookies for the Site, however, if they do so, please note that some features of the Site may not function.

6.8. The following cookies are collected on the Site:

- Technical cookies – necessary for the correct operation and provision of full functionality of the Site;
- Analytical cookies – collected through web analytics tools for the purpose of general analysis of the use of the Site and obtaining data on user actions on the Site to improve its functionality.

6.9. The information contained in cookies is used only for the purposes stated above, after which the collected data is stored locally on the user's computer or mobile device for a period that may depend on the type of cookie concerned, but not exceeding the period necessary to achieve their purpose, after which they are automatically deleted from the user's system.

6.10. In order to collect web analytics, the Yandex.Metrica service is used, which allows you to analyze the activity of Site Users and improve its performance (web analytics service provider: Yandex LLC, provider address: 119021, Moscow, Lev Tolstoy St., no. . 16)

6.11. You can familiarize yourself with the privacy policy of Yandex LLC and the terms of use of the Yandex.Metrica service using the following links:

<https://yandex.ru/legal/confidential/>

[https://yandex.ru/legal/metrica\\_termsfuse/](https://yandex.ru/legal/metrica_termsfuse/)

6.12. Personal data collected by web analytics services is processed upon prior receipt of Consent to the processing of personal data provided by the site user using a cookie banner located on the main page of the Site.

## **7. Confidentiality and security of personal data**

To ensure the confidentiality and security of personal data of personal data subjects, protect personal data from unauthorized or accidental access to it, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data in accordance with the law RF The Operator takes the necessary legal, organizational and technical measures. These measures include:

- appointment of a person responsible for organizing the processing of personal data in the Company;
- adoption of local regulations and other documents in the field of processing and protection of personal data;
- compliance with conditions ensuring the safety of personal data and excluding unauthorized access to it;
- detecting facts of unauthorized access to personal data and taking measures;
- access to processed personal data is provided only to employees who need it in connection with the performance of their job duties;
- signing by the Company's employees, authorized to process personal data, of an obligation not to disclose personal data that became known to them in the performance of their work duties;
- organizing training and conducting methodological work with the Operator's employees authorized to work with personal data, including through information systems;
- obtaining consents of personal data subjects for the processing of their personal data, except for cases provided for by the legislation of the Russian Federation;
- separation of personal data processed without the use of automation tools from other information, in particular by recording them on separate tangible media of personal data, in special sections;

- ensuring separate storage of personal data and their material media, the processing of which is carried out for different purposes and which contain different categories of personal data;
- identification of current threats to the security of personal data during their processing in the personal data information system;
- application of the necessary organizational and technical measures to ensure the security of personal data processed in information systems necessary to ensure the established level of security;
- organization of work with information systems in which personal data is processed;
- establishing individual passwords for employees to access the information system in accordance with their job responsibilities;
- use of certified anti-virus software with regularly updated databases;
- storage of tangible media of personal data in compliance with conditions that ensure the safety of personal data and exclude unauthorized access to them;
- implementation of internal control of compliance of the processing of personal data with the Federal Law of July 27, 2006 No. 152-FZ “On Personal Data” and the regulatory legal acts adopted in accordance with it, requirements for the protection of personal data, this Policy, local regulations of the Operator;
- other measures provided for by the legislation of the Russian Federation in the field of personal data.

## **8. Updating, correction, deletion and destruction of personal data, responses to requests from subjects for access to personal data**

- 8.1. The subject of personal data has the right to demand from the Operator clarification of his personal data, blocking or destruction of it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as take measures provided by law to protect his rights .
- 8.2. Confirmation of the fact of processing of personal data by the Operator, legal grounds and purposes of processing personal data, as well as other information specified in Part 7 of Art. 14 of Federal Law No. 152-FZ “On Personal Data” are provided by the Operator to the subject of personal data or his representative within 10 working days from the date of application or receipt of the request of the subject of personal data or his representative. This period may be extended, but not more than five working days. To do this, the Operator should send a reasoned notice to the personal data subject indicating the reasons for extending the period for providing the requested information.

The information provided does not include personal data relating to other subjects of personal data, unless there are legal grounds for disclosing such personal data.

The request must contain:

- the number of the main document identifying the subject of personal data or his representative, information about the date of issue of the specified document and the issuing authority;
- information confirming the participation of the subject of personal data in relations with the Company (agreement number, date of conclusion of the agreement, symbolic verbal designation and (or) other information), or information otherwise confirming the fact of processing of personal data by the Operator;
- signature of the subject of personal data or his representative.

The request can be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

Address for sending inquiries: 109202, Moscow, st. Karacharovskaya 2-ya, 1 building 1, room. 19, office 3, or by email [admin@nevskiytrans.ru](mailto:admin@nevskiytrans.ru) .

- 8.3. The operator provides the information specified in Part 7 of Art. 14 of Federal Law No. 152-FZ “On Personal Data”, to the subject of personal data or his representative in the form in which the relevant appeal or request was sent, unless otherwise specified in the appeal or request.

If the appeal (request) of the personal data subject does not reflect in accordance with the requirements of the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data" all the necessary information or the subject does not have access rights to the requested information, then a reasoned refusal is sent to him.

The right of the subject of personal data to access his personal data may be limited in accordance with Part 8 of Art. 14 of the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data", including if the personal data subject's access to his personal data violates the rights and legitimate interests of third parties.

- 8.4. Blocking of personal data is carried out by the Operator at the request of the subject of personal data or his representative, as well as at the request of the authorized body for the protection of the rights of personal data subjects in the event of detection of unreliable personal data or unlawful actions with it.
- 8.5. In case of establishing the fact of unlawful or accidental transfer (provision, distribution, access) of personal data, resulting in a violation of the rights of personal data subjects, the Operator is obliged from the moment such an incident is identified by the Operator, the authorized body for the protection of the rights of personal data subjects or other interested party to notify the authorized body on protection of the rights of personal data subjects:
  - within twenty-four hours about the incident that occurred, about the alleged reasons that led to the violation of the rights of personal data subjects, and the alleged harm caused to the rights of personal data subjects, about the measures taken to eliminate the consequences of the relevant incident, and also provide information about the person authorized by the Operator to interact with the authorized body for the protection of the rights of personal data subjects on issues related to the identified incident;
  - within seventy-two hours about the results of the internal investigation of the identified incident, as well as provide information about the persons whose actions caused the identified incident (if any).
- 8.6. If the subject of personal data withdraws consent to the processing of his personal data, the Operator stops their processing or ensures the termination of such processing (if the processing of personal data is carried out by another person acting on behalf of the Operator) and in the event that the preservation of personal data is no longer required for the purposes of processing personal data data, destroys personal data or ensures their destruction (if the processing of personal data is carried out by another person acting on behalf of the Operator) within a period not exceeding thirty days from the date of receipt of the specified review, unless otherwise provided by the agreement to which the party, beneficiary or guarantor is the subject of personal data, another agreement between the Operator and the Subject of personal data, or if the Operator does not have the right to process personal data without the consent of the subject of personal data on the grounds provided for by the Federal Law "On Personal Data" or other federal laws.
- 8.7. Destruction of personal data is carried out by the Operator:
  - upon achieving the purpose of processing personal data;
  - in case of loss of the need to achieve the purposes of processing personal data;
  - in case the subject of personal data withdraws consent to the processing of his personal data;
  - at the request of the subject of personal data or the authorized body for the protection of the rights of subjects of personal data in the event of detection of facts of unlawful actions with personal data, when it is not possible to eliminate the corresponding violations.
- 8.8. The destruction of personal data is carried out under the control of a commission formed in accordance with the procedure established by Nevsky Trans LLC.

The destruction of personal data is carried out in a way that excludes the possibility of recovering this personal data. If personal data cannot be destroyed without such damage to its material carrier that it will prevent its further use for its intended purpose, then both the personal data and their material carrier are subject to destruction.

The destruction of personal data in ISPD and on alienated computer storage media is carried out using standard means, as well as, if necessary, using specialized software or hardware.

The destruction of personal data contained on paper is carried out by shredding into small parts, excluding the possibility of subsequent recovery of information. Grinding is carried out using a shredder.

The fact of destruction of personal data is confirmed by the “Act on the Destruction of Personal Data” or in any other form that allows confirming the fact of destruction of personal data.

The procedure for destroying personal data is established in the local regulations of the Operator.

## **9. Rights and obligations of the Operator, rights of the Personal Data Subject**

### **9.1. The operator is obliged:**

- when processing personal data, comply with the requirements of the Legislation of the Russian Federation regarding the processing and protection of personal data, including the requirements provided for the collection of personal data;
- when collecting personal data, including via the Internet, ensure recording, systematization, accumulation, storage, clarification (updating, changing), retrieving personal data of Personal Data Subjects (citizens of the Russian Federation) using databases located on the territory of the Russian Federation, with the exception of cases provided for by the Legislation of the Russian Federation;
- when collecting personal data using the Internet, publish on the pages of the Website owned by the Operator, through which personal data is collected, a document defining its policy regarding the processing of personal data, and information about the implemented requirements for the protection of personal data, as well as provide the possibility of access to the specified document;
- in case of receiving personal data not from the Personal Data Subject, before the start of personal data processing, provide the Personal Data Subject with the information provided for by the Federal Law of July 27, 2007 No. 152-FZ “On Personal Data”, taking into account the exceptions established by the Legislation of the Russian Federation;
- fulfill the duties provided for Personal Data Operators when receiving requests and/or appeals on personal data issues from the Personal Data Subject and/or his Representative (with the authority to represent the interests of the Personal Data Subject), and/or from the Supervisory Authority;
- take measures aimed at ensuring compliance with the requirements of the Federal Law of July 27, 2007 No. 152-FZ “On Personal Data”;
- take measures to ensure the security of personal data during their processing;
- fulfill obligations to eliminate violations of the Legislation of the Russian Federation, if such violations were committed during the processing of personal data, as well as fulfill obligations to clarify, block, and destroy personal data in cases provided for by the Legislation of the Russian Federation;
- fulfill the obligations established by Federal Law No. 152-FZ of July 27, 2007 “On Personal Data” for Personal Data Operators, in the event of receiving from the Personal Data Subject a request to stop processing personal data and/or withdraw consent to the processing of personal data;
- perform other duties provided for by the Legislation of the Russian Federation;
- persons guilty of violating the rules governing the processing and protection of personal data bear responsibility under the legislation of the Russian Federation, local acts of the Company and agreements governing the legal relations of the Company with third parties.

### **9.2. The operator has the right:**

- process personal data of Personal Data Subjects in the absence of consent to the processing of personal data in cases provided for by law;
- transfer personal data of Personal Data Subjects to third parties, government agencies, municipal authorities, government agencies, state extra-budgetary funds, other persons (if applicable), as well as entrust the processing of personal data of Personal Data Subjects to third parties, other persons if there

are appropriate legal grounds and compliance with the requirements of the Federal Law of July 27, 2007 No. 152-FZ "On Personal Data";

- refuse the Personal Data Subject to provide information about the processing of his personal data in cases provided for by Federal Law No. 152-FZ of July 27, 2007 "On Personal Data";
- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations provided for by the Federal Law of July 27, 2007 No. 152-FZ "On Personal Data" and the regulatory legal acts adopted in accordance with it, unless otherwise provided by the Legislation of the Russian Federation;
- exercise other rights provided for by the legislation of the Russian Federation.

9.3. The subject of personal data has the right:

- freely, of his own will and in his own interest, provide consent to the processing of personal data, taking into account the legal requirements for the form and content of consents to the processing of personal data;
- send requests and/or appeals, including repeated ones, and receive information on the processing of personal data belonging to the Subject of Personal Data in the manner, form, volume and within the time limits established by the Legislation of the Russian Federation;
- require the Operator to clarify their personal data, block it or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, and also take measures provided for by the Legislation of the Russian Federation to protect their rights;
- request the Operator to stop processing your personal data, as well as withdraw the consent provided to the processing of personal data;
- appeal the actions or inaction of the Operator to the Authorized Body for the Protection of the Rights of Personal Data Subjects or in court;
- take measures provided by law to protect your rights.

## **10. Final provisions**

- 10.1. All relations relating to the processing of personal data that are not reflected in this Policy are regulated in accordance with the provisions of the legislation of the Russian Federation.
- 10.2. The policy is approved and put into effect by the General Director of Nevsky Trans LLC and is valid until it is cancelled.
- 10.3. This Policy is subject to change and addition in the event of the emergence of new legislative acts and special regulations on the processing and protection of personal data.
- 10.4. Subjects of personal data can receive any clarification on issues of interest regarding the processing of their personal data, as well as file a complaint regarding the incorrectness of personal data or the illegality of their processing by sending a request to the Operator at the address: 109202, Moscow, st. Karacharovskaya 2-ya, 1 building 1, room. 19, office 3, or by email [admin@nevskiytrans.ru](mailto:admin@nevskiytrans.ru) .