

POLICY OF PERSONAL DATA PROCESSING

1. INTRODUCTION

1.1 This document determines the policy of Air Trans Cargo LLC (hereinafter the Company) with regard to personal data (hereinafter PD) processing

1.2 This Policy has been developed in accordance with the applicable legislation of the Russian Federation on personal data.

1.3 This Policy shall apply to all processes of personal data gathering, recording, systematization, accumulation, storage, specification, retrieval, use, transfer (dissemination, provision, and access), depersonalization, blocking, removal, and destruction to be carried out with/without the use of automated equipment.

1.4. This Policy shall apply to the personal data obtained both before and after the expression of the User's consent with this Policy.

2. PRINCIPLES OF PERSONAL DATA PROCESSING

Personal data processing is carried out on the basis of the following principles:

- 1) Personal data processing is carried out on a lawful and fair basis;
- 2) Personal data processing is limited by achievement of particular pre-determined and lawful purposes. No personal data processing inconsistent with the purposes of personal data acquisition is allowed;
- 3) No integration of the databases containing personal data processed for incompatible purposes is allowed;
- 4) Only the personal data satisfying the purposes of their processing may be processed;
- 5) The content and volume of the processed personal data conform to the declared purposes of processing. The personal data being processed are not redundant with regard to the declared processing purposes;
- 6) In personal data processing it is necessary to ensure the personal data accuracy, sufficiency and, if required, their relevance with regard to the declared purposes of their processing.
- 7) Personal data are stored in the form allowing identification of the subject of the personal data for a period not longer than the one required by the purposes of personal data processing unless the period of personal data storage has been established by the federal law, agreement a party to which, a beneficiary or a grantor under which is the subject of the personal data. The processed personal data are to be destroyed or depersonalized after the purposes of processing have been achieved or it is no longer necessary to achieve these purposes, unless otherwise provided by the federal law.
- 8) In its activities the Company proceeds from the fact that the subject of the personal data provides accurate and reliable information during interaction with the Company and notified the Company's representatives about any change of his personal data.

3. USE OF PERSONAL DATA

3.1 The Company processes the personal data of clients and visiting clients (Users) of the Company's official website www.atcargo.net (hereinafter the Website). The purposes of processing of their personal data are determined for these categories of the subjects of personal data.

3.2 When the information placed on the Company's official Website is used, the hardware of the Website automatically identifies the network (IP) addresses and domain names of each user of information.

3.3 The information and electronic addresses of the persons using the services of the Website and/or sending electronic messages to the addresses stated on the Website mentioned in cl.

3.2. The information about the pages of the Website accessed by the users of the information

and other information (including personal one) reported by the users of the information are stored with the use of the Website software and hardware for the following purposes:

- Information about the users of information accumulated and stored in the Website hardware is used exclusively for the purposes of improving the ways and methods of information presentation on the Website, improving of servicing of the information users, identifying the most frequently visited pages of the Website, maintaining of statistics of Website sessions. The personal data of the subjects of personal data are also processed for the purposes of rendering of services by means of the Website and rendering of subsequent services.

3.4 The Company processes the following categories of personal data:

- The data stated in cl. 3.3 as well as the personal data obtained by the use of different technologies, such as cookie-files, flash cookie-files and web beacons during the Website session;
- The registration data stated by the buyer on the Website: surname, given name, patronymic, phone number, e-mail address.

3.5 The information about the information users may not be used or disclosed in any way beyond the limits stated in cl. 3.3. Such information can be accessed only by persons specially authorized to carry out the works specified in cl. 3.3 and warned about liability for incidental or intentional disclosure or unauthorized use of such information.

3.6 Any information derived from the information listed in cl. 3.2 is provided for subsequent use (distribution) in a summarized form only without statement of the particular IP addresses and domain names of the information users.

3.7 Distribution of any electronic messages to the IP addresses of information users as well as placement of hyperlinks to the IP addresses of information users and/or their Internet pages on the Website are only allowed if a preliminary consent of the information user to such distribution and/or placement has been preliminarily obtained.

4. TERMS OF PERSONAL DATA PROCESSING

4.1 Personal data are processed in compliance with the principles and rules established by the Federal Law "On Personal Data". Personal data may be processed in the following cases:

- 1) Personal data are processed with the consent of the subject of the personal data to processing of his personal data;
- 2) Personal data processing is necessary to achieve the purposes stipulated by the international treaty of the Russian Federation or the law for implementation and performance of the functions, powers and obligations imposed on the operator by the legislation of the Russian Federation;
- 3) Personal data processing is necessary for administration of justice, execution of a judicial act, act of another body or officer to be executed in accordance with the legislation of the Russian Federation on enforcement proceedings;
- 4) Personal data processing is necessary for performance of an agreement a party to which, a beneficiary or a grantor under which is the subject of the personal data as well as conclusion of an agreement at the initiative of the subject of the personal data or an agreement under which the subject of the personal data will be a beneficiary or a grantor;
- 5) Personal data processing is necessary to protect the life, health or other vital interests of the subject of the personal data if the consent of the subject of the personal data cannot be obtained;
- 6) Personal data processing is necessary for exercising of the rights and lawful interests of the operator or third parties or for achievement of socially significant purposes provided it does not violate the rights and liberties of the subject of the personal data;
- 7) Personal data processing is carried out for statistical or other research purposes subject to mandatory depersonalization of the personal data. An exception is personal data processing for market promotion of goods, works, and services by means of direct contacts with the potential consumer through communication media as well as for political solicitation;
- 8) Processed are the personal data the access to which for an unlimited range of people has been provided by the subject of the personal data or upon his request (hereinafter the personal data which have been made public by the subject of the personal data);

- 9) Processed are the personal data to be published or to be disclosed in accordance with the federal law.
- 4.2 The Company may NOT include personal data of subjects in public sources of personal data.
- 4.3 The Company may NOT process special categories of personal data concerning the race, ethnicity, condition of health.
- 4.4 The Company does NOT process biometrical personal data (information characterizing the physiological and biological features of the person which allow establishment of his identity and which are used by the operator to establish the identity of the subject of the personal data).
- 4.5 The Company carries out transboundary transfer of personal data only to the territory of foreign states ensuring adequate protection of the rights of the subjects of personal data.
- 4.6 NO decisions generating legal consequences with regard to the subject of the personal data or otherwise affecting his rights and lawful interests are made on the basis of automated personal data processing only.
- 4.7 The terms of the license for the Company's activities do not contain any ban on transfer of personal data to third parties without a written consent of the subject of the personal data.
- 4.8 If there is no need for a written consent of the subject to processing of his personal data, the consent of the subject may be given by the subject of the personal data or his representative in any form allowing receipt of the fact of its receipt.
- 4.9 The Company is entitled to commission personal data processing to another person with the consent of the subject of the personal data unless otherwise provided by the federal law, on the grounds of an agreement to be concluded with this person (hereinafter the operator's instruction). In this case in the agreement the Company obliges the person carrying out personal data processing on the Company's instruction to comply with the principles and rules of personal data processing stipulated by the Federal Law.
- 4.10 In case if the Company commissions personal data processing to another person, the Company is responsible to the subject of the personal data for the actions of this person. The person processing the personal data on the instruction of the Company is responsible to the Company.
- 4.11 The Company commits and obliges other persons having access to personal data not to disclose personal data to third parties and not to distribute personal data without the consent of the subject of the personal data, unless otherwise provided by the federal law.

5. OBLIGATIONS OF THE COMPANY

In accordance with the requirements of Federal Law No. 152-FZ "On Personal Data" the Company shall:

- Provide the subject of the personal data at his request the information concerning processing of his personal data or provide a reasoned refusal on lawful grounds containing a reference to the provisions of the Federal Law.
- At the request of the subject of the personal data specify the personal data being processed, block or remove them if the personal data are incomplete, outdated, unlawfully obtained or unnecessary for the declared purpose of processing.
- Maintain a Logbook of applications of subjects of personal data which must contain records of the requests of subjects of personal data for obtaining of personal data as well as the facts of provision of personal data upon these requests.
- Notify the subject of the personal data about the personal data processing if the personal data were not obtained from the subject of the personal data. An exception is the following cases:
 1. The subject of the PD has been notified about the processing of his PD by the respective operator;
 2. The PD were obtained by the Company on the grounds of the federal law or in connection with performance of the agreement a party to which or a beneficiary or a grantor under which is the subject of the PD;
 3. The PD have been made public by the subject of the PD or have been obtained from a public source.
 4. The Company carries out PD processing for statistical or research purposes unless this violates the rights and lawful interests of the subject of the PD.

5. Provision of the subject of the PD with the information contained in the Notice about PD processing violates the rights and lawful interests of third parties.

- In case of achievement of the purpose of personal data processing immediately cease personal data processing and destroy the relevant personal data within the period of not more than thirty days from the date of achievement of the purpose of personal data processing unless otherwise provided by the agreement a party to which, a beneficiary or a grantor under which is the subject of the personal data, by another agreement between the Company and the subject of the personal data or if the Company is not entitled to carry out personal data processing without the consent of the subject of the personal data on the grounds stipulated by Federal Law No. 152-FZ "On Personal Data" or by other federal laws.
- In case of withdrawal of the consent to processing of his personal data by the subject of the personal data cease personal data processing and destroy the personal data within a period of not more than thirty days from the date of the said withdrawal unless otherwise provided by the agreement between the Company and the subject of the personal data. The Company shall notify the subject of the personal data about the destruction of the personal data.
- In case of the subject's request to cease personal data processing for the purpose of market promotion of goods, works, and services immediately cease personal data processing.
- Carry out personal data processing only with the written consent of the subject of the personal data in the cases stipulated by the Federal Law.
- Explain the legal consequences of his refusal to provide his personal data to the subject of the personal data if provision of the personal data is mandatory pursuant to the Federal Law.
- Notify the subject of the personal data or his representative about all changes concerning the relevant subject of the personal data.

6. MEASURES TO ENSURE SECURITY OF PERSONAL DATA DURING THEIR PROCESSING

6.1 In the process of personal data processing the Company shall take the necessary legal, organizational and technical measures to protect personal data against unauthorized access to them, destruction, alteration, blocking, copying, presentation, distribution of personal data as well as against other illegal actions with regard to personal data.

6.2 Personal data security shall be ensured, in particular:

- by identification of threats to personal data security during their processing in information systems of personal data;
- by application of organizational and technical measures to ensure personal data security during their processing in information systems of personal data necessary to meet the requirements to personal data protection, their performance being ensured by the levels of personal data protection established by the Government of the Russian Federation;
- by application of information protection products which have been evaluated according to the established procedure;
- by evaluation of the effectiveness of the measures taken to ensure personal data security;
- by accounting of personal data media;
- by detection of the facts of unauthorized access to personal data and by taking measures;
- by restoring the personal data modified or destroyed due to unauthorized access to them;
- by establishing the rules of access to personal data processed in the information system of personal data as well as by ensuring registration and accounting of all actions performed on personal data in the information system of personal data;
- by control over the measures taken to ensure personal data security and the level of protection of information systems of personal data;
- by assessment of the damage which may be caused to subjects of personal data in case of violation of the legislation of the Russian Federation in the field of personal data, the correlation of the caused damage and the taken measures aimed at ensuring implementation of the legislation of the Russian Federation in the field of personal data.

7. HANDLIGN APPLICATIONS.

The following e-mail is used for issues related with processing and storage of personal data as well as for applications of persons being subjects of PD for their removal, blocking and processing of personal data in the Company:
personal@atcargo.net