

The personal data processing and protection policy of JSC VDNH in relation to personal data of the visitors and participants of their own exhibition, fair, congress-exhibition and other events, participants of guest events and contractors

I. General provisions

1. The present Policy was developed in accordance with Federal Law No. 152-ФЗ of July 27, 2006 “On Personal Data” and other regulatory legal acts of the Russian Federation in the field of personal data processing and protection.

2. Requirements of the present Policy shall be executed by the employees of JSC VDNH processing personal data of visitors and participants of their own exhibition, fair, congress-exhibition and other events, guest events participants and contractors.

3. JSC VDNH, being an operator processing personal data, ensures the protection of the rights and freedoms of subjects when processing their personal data and takes measures to ensure the fulfillment of duties provided for by the Federal Law No. 152-ФЗ dated July 27, 2006 “On Personal Data” and in accordance with regulatory legal acts connected to it.

4. This document is publicly available and shall be placed on the official website of JSC VDNH.

II. Main terms and definitions

5. The following terms and definitions are used in the present Policy:

- personal data - any information relating to directly or indirectly determined individual or an individual being determined (subject of personal data);
- Operator - a state or municipal body, legal or natural person that independently or jointly with other persons, organizes and (or) processes personal data, as well as determines the purposes of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data;
- personal data subjects - visitors and participants of their own exhibition, fair, congress-exhibition and other events, guest events participants and contractors;
- contractor- a legal or natural person with which JSC VDNH has a contractual relationship or plans to enter into a contractual relationship;
- automated processing of personal data - processing of personal data using computer equipment;
- manual processing of personal data -processing of personal data, carried out with the direct participation of a person without the use of computer equipment;
- information system - a set of information contained in databases and information technologies and technical means ensuring its processing;
- personal data processing - any action (operation) or a set of actions (operations) performed with or without the use of automatic equipment applied to personal data, including collection, recording, systematization, accumulation, storage, refinement (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion (including cancellation), destruction of personal data;
- personal data blocking - temporary suspension of personal data processing (unless it is necessary to process personal data);
- access to personal data - the ability to process personal data;
- transfer of personal data - any action or set of actions performed with or without the use of automatic equipment that are - access, distribution, provision of personal data;
- distribution of personal data - any actions aimed at disclosing personal data (transfer of personal data) to an unlimited number of persons or disclosing personal data of an unlimited number of persons, including public disclosure of personal data in the media, placement in information and telecommunication networks or any other provision of access to personal data;

- cross-border transfer of personal data - transfer of personal data to the territory of a foreign state to the foreign state authority, a foreign natural person or legal person;
- destruction of personal data - actions that make it impossible to restore the content of personal data in the information system and (or) actions resulting in the destruction of the personal data material carriers;
- confidentiality of personal data is a mandatory requirement for the operator on not disclosing and not allowing the distribution of personal data to third parties without the consent of the personal data subjects or any other legal basis;
- Personal data protection - an operator's actions aimed at preventing the leakage of protected personal data and unauthorized and unintended effects on the protected personal data.

III. The purpose of personal data processing

6. The processing of personal data of the visitors and participants of their own exhibition, fair, congress-exhibition and other events, guest events participants and contractors is carried out by JSC VDNH in order to:

- inform visitors and participants of their own exhibition, fair, congress-exhibition and other events, guest events participants by sending e-mails, including in order to notify of new products, works, services, special offers and events;
- provide visitors and participants of their own exhibition, fair, congress-exhibition and other events with access to services, information and / or materials in the Internet, including on the official website of JSC VDNH, official websites of events, as well as social networks;
- collect information on the actions of visitors and participants of their own exhibition, fair, congress-exhibitions and other events on the official website of JSC VDNH, official websites of events, as well as social networks to improve the quality of content and it's substance;
- conclude and execute contracts with contractors, participants of their own exhibition, fair, congress-exhibition and other events, guest events participants.

IV. Principles and conditions for the processing of personal data

7. The processing of personal data in JSC VDNH is carried out in compliance with the principles and rules provided for by Federal Law No. 152-ФЗ of July 27, 2006 "On Personal Data", and takes into account the need to ensure the protection of the rights and freedoms of personal data subjects, including protection the right to privacy, personal and family secrets, namely:

- - processing is carried out on a lawful and fair basis;
- - processing is limited to the achievement of specific, predetermined and legitimate goals. Personal data processing that is incompatible with the purposes of their collection is not allowed;
- - merging of the databases containing personal data that are processed for purposes that are incompatible with each other it is not allowed to;
- only those personal data that meet the purposes of processing can be processed;
- the content and volume of personal data processed shall comply with the stated processing goals. It is not allowed to process data that is redundant in relation to the stated goals;
- the processing ensures the accuracy and sufficiency of personal data and, if necessary, relevance to the goals of processing. JSC VDNH takes measures to remove or clarify incomplete or inaccurate data or ensures that such measures are taken;
- personal data are stored in a form that allows to determine the personal data subject for no longer a period than the one the purpose of processing personal data requires, if the period for personal data storing is not established by federal law, a contract to which the personal data subject is beneficiary or guarantor;
- the processed personal data are destroyed or depersonalized upon reaching the processing goals or in case of loss of the need to achieve these goals, unless otherwise provided for by the federal law.

8. Processing of personal data in JSC VDNH is carried out with the consent of the personal data subject, unless otherwise provided for by the law of the Russian Federation. When processing personal data, JSC VDNH is obliged to ensure its confidentiality.

V. Personal Data Subjects

9. JSC VDNH processes personal data of the following categories of personal data subjects: visitors and participants of their own exhibition, fair, congress-exhibition and other events and contractors (to ensure the

implementation of the processing goals specified in section III of this document).

VI. Personal data to be processed

10. JSC VDNH processes the following personal data of the personal data subjects:

- Full Name;
- date, month, year of birth;
- place of work and position;
- field of activity;
- sex;
- telephone number;
- E-mail address;
- full mailing address;
- the address of the place of registration / residence.

JSC VDNH can also process other personal data of the personal data subjects necessary for the implementation of the processing goals specified in paragraph 6 of this document.

VII. Processing of personal data in JSC VDNH

11. Processing of personal data is allowed in the following cases:

- personal data processing is carried out with the consent of the personal data subject to the processing of their personal data;
- personal data processing is necessary for the execution of a judicial act, an act of another body or an official to be executed in accordance with the legislation of the Russian Federation on enforcement proceedings (hereinafter - the execution of a judicial act);
- personal data processing is necessary for the execution of the contract, for which the personal data subject is a beneficiary or guarantor, as well as for entering into a contract on the initiative of the personal data subject or a contract for which the personal data subject will be the beneficiary or guarantor;
- personal data processing is necessary to protect the life, health or other vital interests of the personal data subject, if the consent of the personal data subject is impossible;
- personal data processing is carried out, with the access of an unlimited number of persons to such data provided by the personal data subject or at their request (hereinafter referred to as personal data made publicly available by the personal data subject);
- in other cases provided for by the Federal Law of July 27, 2006 No.152-ФЗ "On Personal Data" and other regulatory legal acts of the Russian Federation in the field of processing and protection of personal data.

12. Processing of personal data can be carried out using computer equipment (automated processing) or with the direct participation of a person without the use of computer equipment (manual processing).

13. The processing of personal data is allowed only to those employees of JSC VDNH, whose duties include the processing of personal data.

The named employees have the right to receive only the personal data they need to perform their duties.

14. The processing of personal data is carried out by:

- obtaining information containing personal data orally and in writing directly from the personal data subjects ;
- submission by the personal data subjects of the originals of the necessary documents;
- obtaining certified copies of documents containing personal data, or copying original documents;
- receiving personal data when sending requests to state authorities, state extra-budgetary funds, other state bodies, local governments, commercial and non-profit organizations, individuals in cases and procedures provided for by the legislation of the Russian Federation;
- obtaining personal data from publicly available sources;
- recording (registration) of personal data in logs, books, registers and other accounting forms;
- obtaining personal data by the means of filling and / or sending of the personal data by the subject through special forms posted on the official website of JSC VDNH, official websites of events, as well as social networks;
- uploading personal data into the information systems of JSC VDNH;
- processing of depersonalized data about the personal data subject if it's allowed in the browser settings of the personal data subject (the saving of "cookie" files and the use of the JavaScript are "on") ;
- use of other means and methods of recording personal data obtained in the framework of the activities

carried out by JSC "VDNH".

15. By filling out and / or sending personal data through personal forms posted on the official website of JSC VDNH, official websites of events, as well as social networks, the personal data subject agrees with this Policy.

16. Transfer of personal data to third parties (including cross-border transfer) is allowed with the written consent of the personal data subjects, except the cases when it is necessary to prevent threats to the life and health of the personal data subjects, as well as in other cases provided for by the legislation of the Russian Federation.

When transferring personal data to third parties in accordance with the agreements entered into by JSC VDNH, it is necessary to ensure compliance with the requirements of the legislation of the Russian Federation and local regulations of JSC VDNH in the field of personal data.

17. Transfer of personal data to authorized executive bodies (Federal Tax Service of the Russian Federation, Pension Fund of the Russian Federation, The Federal Fund for Mandatory Medical Insurance of the Russian Federation, etc.) is carried out in accordance with the requirements of the legislation of the Russian Federation.

18. Cross-border transfer of personal data to the territory of foreign states that are parties to the Convention for the Protection of Individuals in the automated processing of personal data, as well as other foreign states that provide adequate protection of the rights of personal data subjects, is carried out in accordance with Federal Law No. 152 of July 27, 2006. -ФЗ "On personal data" and may be prohibited or limited in order to protect the foundations of the constitutional system of the Russian Federation, morality, health, rights and legitimacy of the interests of citizens, national defense and state security.

Prior to the commencement of the cross-border transfer of personal data, JSC VDNH is obliged to ensure that the foreign state into whose territory it is planned to transfer personal data ensures reliable protection of the rights of the personal data subjects.

Cross-border transfer of personal data on the territory of foreign states that do not provide adequate protection of the personal data subjects rights may be carried out in the following cases:

- when there is a written consent of the personal data subject on the cross-border transfer of their personal data;
- cases, stipulated by international treaties of the Russian Federation;
- cases, provided for by federal laws, when it is necessary to protect the fundamentals of the constitutional system of the Russian Federation, ensure the country's defense and the security of the state, as well as ensure the safety of the stable and safe functioning of the transport complex, protect the interests of the individual, society and the state in the sphere of the transport complex from acts of unlawful interference;
- execution of a contract to which the personal data subject is a party;
- protection of life, health, other vital interests of the personal data subject or other persons when it is impossible to obtain written consent of the personal data subject.

19. JSC VDNH has the right to entrust the processing of personal data to another legal entity or individual entrepreneur with the consent of the personal data subjects on the basis of a concluded agreement. A legal entity or an individual entrepreneur engaged in the processing of personal data on behalf of JSC VDNH shall comply with the principles and rules for the personal data processing provided for by the legislation of the Russian Federation in the field of personal data.

20. In the case when, on the basis of the contract, JSC VDNH transfers or entrusts the processing of personal data to another legal entity or individual entrepreneur, the main condition of the contract shall be the obligation to provide the said person with confidentiality conditions and ensure the security of personal data during their transfer or processing.

21. Storage of personal data in JSC VDNH is carried out in a form that allows determining the personal data subject for no longer than a period then it's required by the processing goal. Upon reaching the processing goals or in case of loss of the need to achieve them, personal data are subject to destruction.

General terms of personal data storage in JSC VDNH are not limited, except for cases determined by the legislation of the Russian Federation and local regulations of JSC VDNH.

VIII. Personal data subjects rights

22. A personal data subject has the right to:

- receive complete information regarding the processing of personal data by JSC VDNH, with the exception of cases provided for by the legislation of the Russian Federation;
- require clarification of incorrect or incomplete personal data, as well as data processed in violation of the

requirements of the legislation of the Russian Federation;

- require blocking or destruction of their personal data when personal data are incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated processing goal;
- to require notification of all persons to whom previously his incorrect or incomplete personal data were communicated about all changes made to them;
- withdraw consent to the processing of their personal data;
- appeal against the operator's actions or inaction when processing their personal data in accordance with the legislation of the Russian Federation;
- request clarification on issues of interest related to the processing of their personal data in JSC VDNH;
- exercise other rights provided for by the legislation of the Russian Federation.

23. The appeal of a personal data subject on the processing of their personal data shall be sent to the following addresses (at the choice of the personal data subject):

- mail: 129223, 119, Prospect Mira, Moscow.
- e-mail: mail.expo@vdnh.ru.

The appeal of the personal data subject with the requirement to clarify personal data / withdraw consent for the processing of personal data shall be sent with the note "clarification of personal data" / "withdrawal of consent for the processing of personal data".

IX. Operator Responsibilities

24. During processing of personal data JSC VDNH shall:

- take the necessary measures to fulfill the obligations of the operator, as provided for by the legislation of the Russian Federation in the field of personal data processing and protection;
- explain to the personal data subject the legal consequences of the refusal to provide personal data, if this is mandatory in accordance with the legislation of the Russian Federation;
- block unlawfully processed personal data;
- carry out the termination of the processing of personal data in accordance with the legislation of the Russian Federation;
- notify the personal data subject on the elimination of violations or the destruction of their personal data;
- - to provide, at the request of the personal data subject or their representative, the information concerning the processing of their personal data in the manner established by the legislation of the Russian Federation and local regulations of JSC VDNH.

25. In order to take the measures necessary to fulfill the obligations provided for by the legislation of the Russian Federation and local regulations of JSC VDNH, the JSC VDNH director general is appointed to be the person responsible for organizing the processing and protection of personal data in JSC VDNH.

26. The person responsible for organizing the processing and protection of personal data at JSC VDNH shall:

- organize the adoption of legal, organizational and technical measures to ensure the protection of personal data processed at JSC VDNH from unlawful or accidental access, destruction, modification, blocking, copying, dissemination of personal data, as well as from other illegal actions in relation to personal data;
- to provide internal control over compliance with the requirements of the legislation of the Russian Federation and local regulations of JSC VDNH in the field of personal data, including requirements for the protection of personal data;
- to organize the notification of the JSC VDNH employees of the provisions of the legislation of the Russian Federation in the field of personal data, local regulations of JSC VDNH on the processing of personal data, as well as requirements for the protection of personal data;
- organize the reception and processing of appeals and requests of personal data subjects or their representatives, as well as monitor the reception and processing of such requests in JSC VDNH.

X. Ensuring personal data security

27. Security of personal data during its procession at JSC VDNH is insured in accordance with the laws of the Russian Federation and the requirements of the authorized state body for the protection of the rights of personal data subjects, the federal executive body authorized in the field of security, and the federal executive body authorized in the field of countering technical intelligence and technical protection of information.

28. JSC VDNH takes the necessary legal, organizational and technical measures to protect personal data from accidental or unauthorized access, destruction, alteration, blocking of access and other unauthorized actions, including measures that exclude access to personal data of unauthorized persons.

29. Protection measures applied by JSC VDNH in the processing of personal data include:

- adoption of local regulations and other documents in the field of personal data processing and protection;
- the appointment of officials responsible for ensuring the security of personal data in the departments and information systems of JSC VDNH;
- organization of training and conducting methodological work with employees engaged in the processing of personal data in the JSC VDNH;
- storage of personal data material carriers in conditions ensuring their safety and excluding unauthorized access to them;
- internal control over the observance of the legislation of the Russian Federation and local regulations of JSC VDNH during personal data processing in JSC VDNH.

30. Responsibility for violation of the requirements of the legislation of the Russian Federation and local regulations of JSC VDNH in the field of processing and protection of personal data is determined in accordance with the legislation of the Russian Federation

**PERSONAL DATA
PROCESSING CONSENT FORM ***

By pressing the “Submit” button, I agree (give the consent) to JSC "VDNH" processing of my personal data, including consent to the processing of personal data by a legal entity or an individual entrepreneur engaged by JSC "VDNH" on the basis of the concluded agreement and I agree with Personal Data Processing and Protection policy** of JSC VDNH in relation to the personal data of the visitors and participants of their own exhibition, fair, congress-exhibition and other events, guest events participants and contractors.

** - the text of the consent is placed under each special form for filling in and / or sending personal data next to the “Send” button.*

*** - the underlined line “Personal Data Processing and Protection policy of JSC "VDNH" in relation to the personal data of the visitors and participants of their own exhibition, fair, congress-exhibition and other events, guest events participants and contractors” is an active link to the pages of the site where text of the relevant document can be found.*

**PERSONAL DATA
PROCESSING REFUSE/ DISCLAIMER FORM***

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