XyloSuisse LLC
Botinsky Proezd 37, bld. 8, of. 92,
140700, Shatura, Shatura District
Moscow region, RF

XyloSuisse
wood based panels and more

КсилоСвисс ООО
Ботинский проезд 37, зд. 8, оф. 92
140700, г. Шатура, Шатурский р-н
Московская область, РФ

APPROVED

General director of "eastconsult" Limited Liability Company – management company of XyloSuisse LLC

_____ J.V. Weiss

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Order № 003/01 dd. April 05, 2017

The policy of personal data processing

1. Assignation and the scope of application.

1.1. The present document (hereinafter referred to as "Policy") stipulates the basic objectives and principles for personal data processing as well as the measures of guaranteeing security of personal data in XyloSuisse LLC (hereinafter referred to as "Processor"). The Policy is a public document of the Processor and is allowed to be checked by any third party.

1.2. The Policy is valid with no time limit after its approval and till it is replaced by a new version hereof.

1.3. The terms and definitions used in the Policy face their meanings in accordance with Russian Federal Law No. 152-FZ "On Personal Data".

1.4. The Policy applies to all employees of the Processor (including those employees working under employment contracts and the employees working under civil contracts), all structural subdivisions of the Company, including separate subdivisions, contractors (customers) of the Processor and their employees. The Policy requirements are also considered and presented in respect of third parties, if their participation in the process of personal data processing by the Processor is necessary, as well as in cases of transfer of personal data to them in accordance with the established procedure on the basis of agreements, contracts, orders for processing.

2. Information about personal data processing.

2.1. The Processor may process personal data both by using automation means and without them.

2.2. The actions with personal data may include their collection, recording, organization, storage, adaptation or alteration, retrieval, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, blocking, erasure or destruction.

2.3. The Processor is processing personal data on a legal and fair basis under the following statutory acts:

> The Constitution of the Russian Federation;
> The Labor Code of the Russian Federation;
> The Civil Code of the Russian Federation;
> The Tax Code of the Russian Federation;
> The Federal Law No. 152-FZ "On Personal Data", dated July 27, 2006;
> The Federal Law No. 149-FZ "On Information, Information Technologies and the Protection of Information", dated July 27, 2006;
> The Federal Law No. 63-FZ "On Electronic Signature", dated April 6, 2011;

The Federal Law No. 99-FZ "On Licensing of Certain Types of Activity", dated May 5, 2011г;

The Federal Law No. 27-FZ "On Individual (Personalized) Record-Keeping in the Compulsory Pension Insurance System", dated April1, 1996;

The Federal Law No. 212-FZ "On insurance fees in the Pension fund of the Russian Federation, Social Insurance Fund of the Russian Federation, Federal fund of compulsory medical insurance", dated July 24, 2009;

The Federal Law No. 125-FZ "On archiving in the Russian Federation", dated October 22, 2004;

The Charter of XyloSuisisse LLC.

2.4. The content and volume of personal data being processed are determined basing on the purposes of processing. No personal data is processed being excessive or incompatible with the following main purposes:

conclusion of labor relations with individuals;

fulfillment of the Processor's contractual obligations;

performance of the certifying center functions;

compliance with the current labor, accounting, tax, pension and any other legislation of the Russian Federation.

2.5. The main categories of personal data subjects whose data are processed by the Processor include:

2.5.1. individuals which are to have employment and/or civil-law relations with the Processor;

2.5.2. individuals being the contractors (clients) of the Processor or which are to have labor and/or civil relations with the contractors (clients) of the Processor;

2.5.3. candidates for the vacant posts of the Processor;

2.6. For the categories of personal data subjects mentioned in p. 2.5 above, the following data may pe processed:

Full name;

gender;

birth date;

birth place;

face image data;

abiding place;

family status;

information on children;

military status;

education;

profession;

information on preceding working places;

INN (personal tax reference number) data;

SNILS (insurance number of the individual ledger account) data;

контактная информация (телефон, адрес электронной почты);

biometric information about the fingerprint of the Company employee (to be processed by the access control system).

2.7. The processing ensures the accuracy of personal data, their sufficiency and relevance in relation to the purposes of personal data processing. Should inaccurate or incomplete personal data be found they are to be clarified and updated.

2.8. The confidentiality is ensured for those personal data that cannot be opened to public.

2.9. Personal data processing and storage shall be carried out for no longer than it is required by the purposes of such personal data processing, if there are no legal ground for further processing, for example, if the Federal law or the contract with the subject of personal data does not set an appropriate

period of data storage. Processed personal data shall be deleted or depersonalized upon the occurrence of the following conditions:

the purposes of personal data processing are achieved or the maximal storage time expiration – within 30 days;

the loss of need to achieve the goals of personal data processing – within 30 days;

provision of confirmation by the subject of personal data or his legal representative that the personal data are illegally received or not necessary for the declared purpose of processing – within 7 days;

impossibility to ensure the legal way of personal data processing – within 10 days;

revocation of consent for personal data processing by the subject of personal data, if the storage of personal data is no longer required for the purpose of personal data processing – within 30 days;

revocation of consent for personal data use in terms of contractual relations with potential consumers when promoting goods and services by the subject of personal data to the – within 2 days;

the expiration of the limitation period for legal relations in the frames of which the processing of personal data is carried out;

liquidation (reorganization) of the Processor.

2.10. Processing of personal data on the basis of contracts and other agreements of the Processor as well as instructions to the Processor and instructions of the Processor for personal data processing shall be carried out in accordance with the terms of such contracts, agreements of the Processor as well as the agreements with third parties which are entrusted or have entrusted such processing legally. Such agreements may define, in particular:

purposes, conditions, terms of personal data processing;

obligations of the parties, including the measures for confidentiality assurance;

rights, obligations and responsibilities of the parties relating to the processing of personal data.

2.11. Unless otherwise stipulated by the current legislation of the Russian Federation or the contract, personal data processing shall be carried out after obtaining the consent of the personal data subject. The consent may be executed in the form of actions, acceptance of the contract-offer terms, putting down the appropriate marks, filling in the blanks in the forms, blank sheets or by means of written consent in accordance with the legislation of the Russian Federation.

3. Measures to ensure the security of personal data.

3.1. The Processor shall take the necessary legal, organizational and technical measures to ensure the security of personal data in order to protect them from unauthorized (as well as accidental) access, destruction, modification, access blocking and other unauthorized actions. Such measures include, in particular:

appointment of employees responsible for organization of personal data processing and security;

verification of the presence in the contracts of the items prescribing the confidentiality of personal data assurance as well as inclusion of items into the contracts if necessary;

publication of local acts on personal data processing, employee's familiarization with them, users training;

ensuring physical security of the premises where the information base is located;

password protection for computers where personal data is installed and stored, usage of the password system on the Internet;

restriction and differentiation of access for employees and other persons to personal data and means of processing, monitoring of all actions with personal data;

identification of threats to personal data security during their processing, developing threat models on this basis;

usage of security tools (anti-virus programs, firewalls, means of protection against illegal access, cryptographic protection of information), including those that have passed the conformity assessment procedure according to the established procedure;

recording and storage of data carriers, excluding their theft, substitution, illegal copying and destruction;

back up information for the possibility of recovering;

implementation of internal control over compliance with the established procedure, verification of the effectiveness of taken measures, response to any incident.

4. Rights of personal data subjects.

4.1. The personal data subject is entitled to recall the consent for personal data processing by means of sending a corresponding request to the Processor by post or by contacting in person.

4.2. The personal data subject is entitled to receive information regarding the processing of his personal data, including:

the confirmation of personal data processing by the Processor;

legal grounds and purposes of personal data processing;

purposes and methods of personal data processing used by the Processor;

name and location of the Processor, information about the persons (except for employees / workers of the Processor) who have access to personal data or who may be conveyed with personal data on the basis of the contract with the Processor or on the basis of the Federal law;

the processed personal data relating to the relevant subject of personal data, the source of such data receipt, since the other order of such data submission is not provided by the Federal law;

the terms of personal data processing, including the terms of their storage;

the procedure of rights exercising under the Federal law "On personal data" for the subject of personal data;

information on the performed or intended cross-border data transmission;

denomination, name, surname, patronymic and the address of the person processing personal data on behalf of the Processor in case such processing is or will be entrusted to such person;

other information provided by the Federal law "On personal data" or any other Federal law.

4.3. The subject of personal data in entitled to require the Processor to clarify his personal data, block or destroy them in case the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing as well as to take legally provided measures to protect his rights.

4.4. If the subject of personal data believes that the Processor processes his personal data with violation of the requirements of the Federal law "On personal data" or otherwise violates his rights and freedoms, the subject of personal data has the right to appeal the actions or inaction of the Processor to the authorized body for protection of the rights of personal data subjects (Federal Service for Supervision in the Sphere of Communications, Information Technology and Mass Communications — Roskomnadzor) or through the courts.

4.5. The subject of personal data is entitled to protect his rights and legitimate interests including the right for damages and (or) moral damage compensations in the court of law.

5. Roles and responsibilities.

5.1. The rights and obligations of the Processor shall be determined by the current legislation of the Russian Federation and the agreements of the Processor.

5.2. Control of execution of requirements of the present Policy shall be carried out by the person responsible for organizing the process of personal data processing within the limits of his powers.

5.3. The responsibility of the persons (involved into the personal data processing on the basis of the Processor's instructions) for illegal use of personal data is established in accordance with the terms of the civil law contract or confidentiality agreement concluded between the Processor and the counterparty.

5.4. The persons being guilty for violation of the rules regulating the processing and protection of personal data shall bear the material, disciplinary, administrative, civil or criminal responsibility in accordance with the procedure established by the Federal laws, local acts, Processor's agreements.

5.5. The Policy is developed by the person responsible for the organization of personal data processing and shall be put into effect after approval by the head of the Processor. Comments and suggestions to be introduced into the Policy should be addressed to: t.koblova@eastconsult.eu . The Policy shall be actualized as and when necessary.