

PERSONAL DATA PROCESSING POLICY

POLICY OF THE ASSOCIATION "BASKETBALL CLUB "UMMC" ON THE PROCESSING OF PERSONAL DATA

1. Key terms and definitions

The following key terms are used in this policy:

Personal data – any information relating to an identified or identifiable individual (personal data subject), either directly or indirectly.

Operator – the Association "BC "UMMC", which independently organizes and carries out the processing of personal data, and also determines the purposes of personal data processing, the composition of personal data to be processed, and the actions (operations) to be performed on personal data.

Processing of personal data – any action (operation) or set of actions (operations) performed on personal data, whether or not by automated means, such as collection, recording, systematization, accumulation, storage, rectification (updating, modification), retrieval, use, transfer (dissemination, provision, access), anonymization, blocking, erasure, and destruction of personal data.

Automated processing of personal data – processing of personal data by means of computing.

Dissemination of personal data – actions aimed at disclosing personal data to an indefinite number of persons.

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

Blocking of personal data – temporary suspension of the processing of personal data (except for cases where processing is necessary for the rectification of personal data).

Destruction of personal data – actions resulting in the irreversible elimination of personal data from information systems and/or the destruction of physical storage media containing personal data.

Anonymization of personal data – actions making it impossible to identify the personal data subject without the use of additional information.

Personal data information system – personal data stored in databases, along with the information technologies and technical means used to process that data.

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

2. General provisions

The Association "BC "UMMC", guided by its commitment to full compliance with the legislation of the Russian Federation and the maintenance of its business reputation, considers it its responsibility to uphold the principles of fairness, legality, confidentiality, and security in the processing of personal data.

This personal data processing policy:

is developed in accordance with the requirements of the Constitution of the Russian Federation, the legislation of the Russian Federation, and regulatory legal acts of the Russian Federation in the field of personal data;

defines the main principles, purposes, and methods of personal data processing, the categories of personal data subjects and their rights, the actions of the Association "BC "UMMC" when processing personal data, the measures taken by the Association "BC "UMMC" to protect personal data, as well as the measures for monitoring compliance with legal requirements and this Policy;

is a publicly accessible document that sets out the principles and procedures followed by the Association "BC "UMMC" in processing personal data.

3. Information about the Operator

Name: Association "BC "UMMC", Taxpayer Identification Number (TIN): 6606014605

Registered address: 1, Uspensky Avenue, Verkhnyaya Pyshma, Sverdlovsk Region, 624091, Russia

Phone: +7 (34368) 9-88-12

Register of Personal Data Operators: <http://rkn.gov.ru/personal-data/register/>,

Registration No. 66-19-005988, Order No. 88 dated 03.07.2019

4. Legal grounds for personal data processing

This personal data processing policy has been developed in accordance with the requirements of the following regulatory legal acts of the Russian Federation:

The Constitution of the Russian Federation;

The Labor Code of the Russian Federation;

Federal Law No. 152-FZ of July 27, 2006, "On Personal Data";

Decree of the President of the Russian Federation No. 188 of March 6, 1997, "On the Approval of the List of Confidential Information";

Resolution of the Government of the Russian Federation No. 687 of September 13, 2008, "On Approval of the Regulation on the Specifics of Processing Personal Data Without the Use of Automation Tools";

Resolution of the Government of the Russian Federation No. 512 of July 6, 2008, "On Approval of the Requirements for Physical Media of Biometric Personal Data and Technologies for Storing Such Data Outside Personal Data Information Systems";

Resolution of the Government of the Russian Federation No. 1119 of November 1, 2012, "On Approval of the Requirements for the Protection of Personal Data During Their Processing in Personal Data Information Systems";

Order of the Federal Service for Technical and Export Control (FSTEC of Russia) No. 21 of February 18, 2013, "On Approval of the Composition and Content of Organizational and

Technical Measures to Ensure the Security of Personal Data During Their Processing in Personal Data Information Systems";

Order of the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor) No. 996 of September 5, 2013, "On Approval of the Requirements and Methods for Depersonalization of Personal Data";

Other regulatory legal acts of the Russian Federation and regulatory documents issued by authorized government bodies.

5. Purposes of personal data processing, data subjects and categories (list) of personal data, duration of processing

5.1. Purpose of personal data processing: fulfillment of the terms and conditions of employment contracts, agreements, and internal regulatory acts of the employer; preparation of documents necessary for the execution of employment contracts, agreements, and internal policies of the employer.

- categories (list) of personal data: surname, first name, patronymic; age; sex; date and place of birth; passport details; registered address; residential address; citizenship; military registration documents; driver's license information; passport or other identity documents used outside the Russian Federation; birth certificate details; signature (autograph); information about the presence or absence of a criminal record; bank account details; anthropometric data; biometric data; medical data; health condition; photographs; video recordings; mobile and home phone numbers; email address; individual insurance account number (SNILS); taxpayer identification number (TIN); employment and job title information; information contained in the employment record book; educational background; marital status; financial status (including information on income, assets and liabilities of the data subject); employment history; game performance data (coordinates, speed, etc.), including statistical indicators; information about professional experience, professional and personal interests and preferences, including age and reasons for starting to play basketball; names and locations of basketball schools attended, periods of study, year of graduation; full names of coaches; information on sports status such as "Foreign player", "Legionnaire"; language proficiency; career achievements and awards; information about relatives who are professional or well-known athletes; reasons for choosing basketball as their sport; main sports goals, favorite basketball players and athletes in other sports; hobbies; expected age, location, and reasons for retiring from a basketball career; life goals unrelated to basketball following retirement from a basketball career; social media profile information.

- data subjects: staff and non-staff employees engaged in employment and/or contractual relations with the Association "Basketball Club UMMC"; legal representatives.

- actions (operations) performed on personal data: collection; recording; systematization; accumulation; storage; rectification (updating, modification); retrieval; use; transfer (dissemination, provision, access); anonymization; blocking; erasure; destruction of personal data.

- duration of personal data processing: the retention period for personal data is set at fifteen (15) years.

5.2. Purpose of personal data processing: to ensure the security and safety of employees.

- categories (list) of personal data: surname, first name, patronymic; age; sex; date and place of birth; passport details; registered address; residential address; citizenship; military registration

documents; passport or other identity documents used outside the Russian Federation; birth certificate details; signature (autograph); information about the presence or absence of a criminal record; anthropometric data; biometric data; medical data; health condition; photographs; video recordings; mobile and home phone numbers; email address; individual insurance account number (SNILS); taxpayer identification number (TIN); employment and job title information; information contained in the employment record book; educational background; marital status; financial status (including information on income, assets and liabilities of the data subject); employment history;

- data subjects: staff and non-staff employees engaged in employment and/or contractual relations with the Association "Basketball Club "UMMC"; legal representatives.

- actions (operations) performed on personal data: collection; recording; systematization; accumulation; storage; rectification (updating, modification); retrieval; use; transfer (dissemination, provision, access); anonymization; blocking; erasure; destruction of personal data.

- duration of personal data processing: the retention period for personal data is set at fifteen (15) years.

5.3. Purpose of personal data processing: to ensure the security and protection of property belonging to both employees and the employer.

- categories (list) of personal data: surname, first name, patronymic; age; sex; date and place of birth; passport details; registered address; residential address; citizenship; military registration documents; passport or other identity documents used outside the Russian Federation; birth certificate details; signature (autograph); information about the presence or absence of a criminal record; anthropometric data; biometric data; medical data; health condition; photographs; video recordings; mobile and home phone numbers; email address; individual insurance account number (SNILS); taxpayer identification number (TIN); employment and job title information; information contained in the employment record book; educational background; marital status; financial status (including information on income, assets and liabilities of the data subject); employment history;

- data subjects: staff and non-staff employees engaged in employment and/or contractual relations with the Association "Basketball Club "UMMC"; legal representatives.

- actions (operations) performed on personal data: collection; recording; systematization; accumulation; storage; rectification (updating, modification); retrieval; use; transfer (dissemination, provision, access); anonymization; blocking; erasure; destruction of personal data.

- duration of personal data processing: the retention period for personal data is set at fifteen (15) years.

5.4. Purpose of personal data processing - to facilitate communication, including through various communication channels.

- categories (list) of personal data: surname, first name, patronymic; age; sex; date and place of birth; passport details; registered address; residential address; mobile and home phone numbers; email address; employment and job title information;

- categories of personal data subjects: staff and non-staff employees engaged in employment and/or contractual relations with the Association "Basketball Club "UMMC"; natural persons

who are customers/clients of the Association "Basketball Club "UMMC"; natural persons who are counterparties or representatives of counterparties under contracts concluded by the Association "Basketball Club "UMMC"; natural persons who are visitors to the Association "Basketball Club "UMMC"; legal representatives.

- actions (operations) performed on personal data: collection; recording; systematization; accumulation; storage; rectification (updating, modification); retrieval; use; transfer (dissemination, provision, access); anonymization; blocking; erasure; destruction of personal data.
- duration of personal data processing: the retention period for personal data is set at fifteen (15) years.

5.5. The purpose of personal data processing is to ensure compliance with access control and video surveillance procedures at the workplace.

- categories (list) of personal data: surname, first name, patronymic; age; sex; date and place of birth; passport details; registered address; residential address; citizenship; military registration documents; passport or other identity documents used outside the Russian Federation; birth certificate details; signature (autograph); anthropometric data; biometric data; medical data; health condition; photographs; video recordings; mobile and home phone numbers; email address; individual insurance account number (SNILS); taxpayer identification number (TIN); employment and job title information;
- categories of personal data subjects: staff and non-staff employees engaged in employment and/or contractual relations with the Association "Basketball Club "UMMC"; natural persons who are customers/clients of the Association "Basketball Club "UMMC"; natural persons who are counterparties or representatives of counterparties under contracts concluded by the Association "Basketball Club "UMMC"; natural persons who are visitors to the Association "Basketball Club "UMMC"; legal representatives.
- actions (operations) performed on personal data: collection; recording; systematization; accumulation; storage; rectification (updating, modification); retrieval; use; transfer (dissemination, provision, access); anonymization; blocking; erasure; destruction of personal data.
- duration of personal data processing: the retention period for personal data is set at fifteen (15) years.

5.6. The purpose of personal data processing is to issue Voluntary Health Insurance (VHI) policies.

- categories (list) of personal data: surname, first name, patronymic; age; sex; date and place of birth; passport details; registered address; residential address; citizenship; military registration documents; passport or other identity documents used outside the Russian Federation; signature (autograph); anthropometric data; biometric data; medical data; health condition; photographs; video recordings; mobile and home phone numbers; email address; individual insurance account number (SNILS); taxpayer identification number (TIN); employment and job title information; information contained in the employment record book; employment history;
- data subjects: staff and non-staff employees engaged in employment and/or contractual relations with the Association "Basketball Club "UMMC".

- actions (operations) performed on personal data: collection; recording; systematization; accumulation; storage; rectification (updating, modification); retrieval; use; transfer (dissemination, provision, access); anonymization; blocking; erasure; destruction of personal data.

- duration of personal data processing: the retention period for personal data is set at fifteen (15) years.

5.7. The purpose of personal data processing is to organize and conduct seminars, conferences, meetings, events, etc.

- categories (list) of personal data: surname, first name, patronymic; age; sex; date and place of birth; passport details; registered address; residential address; citizenship; military registration documents; passport or other identity documents used outside the Russian Federation; signature (autograph); information about the presence or absence of a criminal record; bank account details; anthropometric data; biometric data; medical data; health condition; photographs; video recordings; mobile and home phone numbers; email address; individual insurance account number (SNILS); taxpayer identification number (TIN); employment and job title information; information contained in the employment record book; educational background; marital status; financial status (including information on income, assets and liabilities of the data subject); employment history; game performance data (coordinates, speed, etc.), including statistical indicators; information about professional experience, professional and personal interests and preferences, including age and reasons for starting to play basketball; names and locations of basketball schools attended, periods of study, year of graduation; full names of coaches; information on sports status such as "Foreign player", "Legionnaire"; language proficiency; career achievements and awards; information about relatives who are professional or well-known athletes; reasons for choosing basketball as their sport; main sports goals, favorite basketball players and athletes in other sports; hobbies; expected age, location, and reasons for retiring from a basketball career; life goals unrelated to basketball following retirement from a basketball career; social media profile information.

- categories of personal data subjects: staff and non-staff employees engaged in employment and/or contractual relations with the Association "Basketball Club "UMMC"; natural persons who are customers/clients of the Association "Basketball Club "UMMC"; natural persons who are counterparties or representatives of counterparties under contracts concluded by the Association "Basketball Club "UMMC"; natural persons who are visitors to the Association "Basketball Club "UMMC"; legal representatives.

- actions (operations) performed on personal data: collection; recording; systematization; accumulation; storage; rectification (updating, modification); retrieval; use; transfer (dissemination, provision, access); cross-border transfer of personal data; anonymization; blocking; erasure; destruction of personal data.

- duration of personal data processing: the retention period for personal data is set at fifteen (15) years.

5.8. The purpose of personal data processing is to carry out business and entrepreneurial activities, and to perform contracts to which the Club is a party or a beneficiary.

- categories (list) of personal data: surname, first name, patronymic; age; sex; date and place of birth; passport details; registered address; residential address; citizenship; military registration documents; driver's license information; passport or other identity documents used outside the

Russian Federation; birth certificate details; signature (autograph); information about the presence or absence of a criminal record; bank account details; anthropometric data; biometric data; medical data; health condition; photographs; video recordings; mobile and home phone numbers; email address; individual insurance account number (SNILS); taxpayer identification number (TIN); employment and job title information; information contained in the employment record book; educational background; marital status; financial status (including information on income, assets and liabilities of the data subject); employment history;

- categories of personal data subjects: staff and non-staff employees engaged in employment and/or contractual relations with the Association "Basketball Club "UMMC"; natural persons who are customers/clients of the Association "Basketball Club "UMMC"; natural persons who are counterparties or representatives of counterparties under contracts concluded by the Association "Basketball Club "UMMC"; natural persons who are visitors to the Association "Basketball Club "UMMC"; legal representatives.

- actions (operations) performed on personal data: collection; recording; systematization; accumulation; storage; rectification (updating, modification); retrieval; use; transfer (dissemination, provision, access); cross-border transfer of personal data; anonymization; blocking; erasure; destruction of personal data.

- duration of personal data processing: the retention period for personal data is set at fifteen (15) years.

5.9. The purpose of personal data processing is to carry out activities in the field of sports.

- categories (list) of personal data: surname, first name, patronymic; age; sex; date and place of birth; passport details; registered address; residential address; citizenship; military registration documents; driver's license information; passport or other identity documents used outside the Russian Federation; birth certificate details; signature (autograph); information about the presence or absence of a criminal record; bank account details; anthropometric data; biometric data; medical data; health condition; photographs; video recordings; mobile and home phone numbers; email address; individual insurance account number (SNILS); taxpayer identification number (TIN); employment and job title information; information contained in the employment record book; educational background; marital status; financial status (including information on income, assets and liabilities of the data subject); employment history; game performance data (coordinates, speed, etc.), including statistical indicators; information about professional experience, professional and personal interests and preferences, including age and reasons for starting to play basketball; names and locations of basketball schools attended, periods of study, year of graduation; full names of coaches; information on sports status such as "Foreign player", "Legionnaire"; language proficiency; career achievements and awards; information about relatives who are professional or well-known athletes; reasons for choosing basketball as their sport; main sports goals, favorite basketball players and athletes in other sports; hobbies; expected age, location, and reasons for retiring from a basketball career; life goals unrelated to basketball following retirement from a basketball career; social media profile information.

- categories of personal data subjects: staff and non-staff employees engaged in employment and/or contractual relations with the Association "Basketball Club "UMMC"; natural persons who are customers/clients of the Association "Basketball Club "UMMC"; natural persons who are counterparties or representatives of counterparties under contracts concluded by the Association "Basketball Club "UMMC"; natural persons who are visitors to the Association "Basketball Club "UMMC"; legal representatives.

- actions (operations) performed on personal data: collection; recording; systematization; accumulation; storage; rectification (updating, modification); retrieval; use; transfer (dissemination, provision, access); cross-border transfer of personal data; anonymization; blocking; erasure; destruction of personal data.

- duration of personal data processing: the retention period for personal data is set at fifteen (15) years.

5.10. The purpose of personal data processing is to maintain personnel and accounting records, including salary payments, bonuses, incentives, and other types of remuneration.

- categories (list) of personal data: surname, first name, patronymic; age; sex; date and place of birth; passport details; registered address; residential address; citizenship; military registration documents; driver's license information; passport or other identity documents used outside the Russian Federation; birth certificate details; signature (autograph); information about the presence or absence of a criminal record; bank account details; anthropometric data; biometric data; medical data; health condition; photographs; video recordings; mobile and home phone numbers; email address; individual insurance account number (SNILS); taxpayer identification number (TIN); employment and job title information; information contained in the employment record book; educational background; marital status; financial status (including information on income, assets and liabilities of the data subject); employment history; game performance data (coordinates, speed, shooting accuracy etc.), including statistical indicators; information about professional experience, professional and personal interests and preferences, including age and reasons for starting to play basketball; names and locations of basketball schools attended, periods of study, year of graduation; full names of coaches; information on sports status such as "Foreign player", "Legionnaire"; language proficiency; career achievements and awards; information about relatives who are professional or well-known athletes; reasons for choosing basketball as their sport; main sports goals, favorite basketball players and athletes in other sports; hobbies; expected age, location, and reasons for retiring from a basketball career; life goals unrelated to basketball following retirement from a basketball career; social media profile information.

- categories of personal data subjects: staff and non-staff employees engaged in employment and/or contractual relations with the Association "Basketball Club "UMMC"; natural persons who are customers/clients of the Association "Basketball Club "UMMC"; natural persons who are counterparties or representatives of counterparties under contracts concluded by the Association "Basketball Club "UMMC"; natural persons who are visitors to the Association "Basketball Club "UMMC"; legal representatives.

- actions (operations) performed on personal data: collection; recording; systematization; accumulation; storage; rectification (updating, modification); retrieval; use; transfer (dissemination, provision, access); cross-border transfer of personal data; anonymization; blocking; erasure; destruction of personal data.

- duration of personal data processing: the retention period for personal data is set at fifteen (15) years.

5.11. The purpose of personal data processing is to facilitate the organization, preparation, and participation of basketball teams in national and international competitions.

- categories (list) of personal data: surname, first name, patronymic; age; sex; date and place of birth; passport details; registered address; residential address; citizenship; military registration

documents; driver's license information; passport or other identity documents used outside the Russian Federation; birth certificate details; signature (autograph); information about the presence or absence of a criminal record; bank account details; anthropometric data; biometric data; medical data; health condition; photographs; video recordings; mobile and home phone numbers; email address; individual insurance account number (SNILS); taxpayer identification number (TIN); employment and job title information; information contained in the employment record book; educational background; marital status; financial status (including information on income, assets and liabilities of the data subject); employment history; game performance data (coordinates, speed, etc.), including statistical indicators; information about professional experience, professional and personal interests and preferences, including age and reasons for starting to play basketball; names and locations of basketball schools attended, periods of study, year of graduation; full names of coaches; information on sports status such as "Foreign player", "Legionnaire"; language proficiency; career achievements and awards; information about relatives who are professional or well-known athletes; reasons for choosing basketball as their sport; main sports goals, favorite basketball players and athletes in other sports; hobbies; expected age, location, and reasons for retiring from a basketball career; life goals unrelated to basketball following retirement from a basketball career; social media profile information.

- categories of personal data subjects: staff and non-staff employees engaged in employment and/or contractual relations with the Association "Basketball Club "UMMC"; natural persons who are customers/clients of the Association "Basketball Club "UMMC"; natural persons who are counterparties or representatives of counterparties under contracts concluded by the Association "Basketball Club "UMMC"; natural persons who are visitors to the Association "Basketball Club "UMMC"; legal representatives.

- actions (operations) performed on personal data: collection; recording; systematization; accumulation; storage; rectification (updating, modification); retrieval; use; transfer (dissemination, provision, access); cross-border transfer of personal data; anonymization; blocking; erasure; destruction of personal data.

- duration of personal data processing: the retention period for personal data is set at fifteen (15) years.

The processing of personal data that does not correspond to the specified purposes is not permitted.

6. Principles of personal data processing

The processing of personal data by the Association "Basketball Club "UMMC" is carried out with due regard for the protection of the rights and freedoms of both the employees of the Association "BC "UMMC" and other individuals whose personal data is being processed, including their rights to privacy, personal and family confidentiality, and is based on the following principles:

Personal data must be processed lawfully and fairly.

The processing of personal data must be limited to the achievement of specific, predefined, and lawful purposes. The processing of personal data for purposes that are incompatible with the purposes of collection is not permitted.

It is prohibited to combine databases containing personal data that are processed for incompatible purposes.

Only personal data that is relevant to the purposes of processing may be subject to processing.

The content and scope of the personal data being processed must correspond to the declared purposes of processing. The personal data processed must not be excessive in relation to the stated purposes.

Personal data must be accurate, sufficient, and, where necessary, kept up to date with respect to the purposes of their processing. The data controller must take necessary measures, or ensure such measures are taken, to delete or rectify incomplete or inaccurate data.

Personal data must be stored in a form that allows identification of the data subject for no longer than is necessary to achieve the purposes of processing, unless a longer retention period is established by federal law or by a contract to which the data subject is a party, beneficiary, or guarantor. Processed personal data must be destroyed or anonymized once the purposes of processing have been achieved or when there is no longer a need to achieve those purposes, unless otherwise provided by federal law.

7. Personal data processing activities

The Association "Basketball Club "UMMC" carries out the collection, recording, systematization, accumulation, storage, rectification (updating, modification), retrieval, use, transfer (dissemination, provision, access), anonymization, blocking, erasure, and destruction of personal data.

The Association "BC "UMMC" processes personal data using the following methods:

automated processing of personal data;

non-automated processing of personal data;

mixed methods of processing.

8. Measures implemented by the Association "BC "UMMC" to ensure the security of personal data during processing

Information carriers containing personal data are stored in specially designated, strictly controlled premises located within secured and monitored areas.

The premises where personal data is stored, as well as the technical equipment used for personal data processing, are under round-the-clock security.

Access to technical equipment used for processing personal data is carried out through automated workstations protected against unauthorized access. Depending on the level of information criticality, access control is enforced using hardware and software-based user identification and authentication tools.

Access for personnel and third parties to secured areas — including premises housing IT and communication systems and personal data storage media — is strictly regulated and restricted.

Access to information is granted only to specifically authorized employees. Logging of user activities is in place, including login/logout events in the operating systems, actions performed at automated workstations, and access to databases.

Measures are implemented to protect information from equipment failures and malicious software. A data recovery system is in operation.

When operating in network environments, information security is ensured through the use of firewalls, demilitarized zones, virtual private networks, secure communication channels, secure data transfer protocols, and hardware/software-based encryption technologies.

9. Responsibility and oversight for compliance with this policy and personal data legislation

The Director of the Association "BC "UMMC" is responsible for ensuring compliance with the requirements of personal data legislation and this Policy.

By order of the Director, a designated person is appointed within the Association "BC "UMMC" who is responsible for organizing the processing and ensuring the protection of personal data.

The person responsible for organizing and ensuring the protection of personal data, in accordance with the provisions of this Policy and applicable legislation of the Russian Federation on personal data, is authorized to:

identify threats to the security of personal data during processing in personal data information systems;

plan the implementation of organizational and technical measures necessary to protect personal data during processing in personal data information systems, in order to counter identified security threats and comply with personal data protection requirements;

organize control and/or audits to verify that the implemented data protection measures comply with Federal Law No. 152-FZ of July 27, 2006 "On Personal Data," applicable regulations, statutory requirements for data protection, and internal policies;

assess the effectiveness of data protection measures prior to commissioning a personal data information system, and organize monitoring of the security level of personal data during its operation;

analyze incidents involving violations of this Policy;

develop and implement corresponding measures to maintain the required level of personal data protection;

organize the receipt and handling of inquiries and requests from regulatory authorities of the Russian Federation, personal data subjects, or their representatives.

Persons found responsible for violating the provisions of the applicable personal data legislation of the Russian Federation may be subject to disciplinary, administrative, civil, or criminal liability in accordance with the applicable laws of the Russian Federation.

10. Rights of personal data subjects

A personal data subject has the right to receive information regarding the processing of their personal data by the Association "BC "UMMC", including the following:

1. Confirmation of the fact of personal data processing by the operator;
2. The legal grounds and purposes of personal data processing;
3. The purposes and methods of personal data processing used by the operator;
4. The name and location of the operator, as well as information about persons (except for the operator's employees) who have access to the personal data or to whom the personal data may be disclosed on the basis of a contract with the operator or under federal law;

5. The personal data being processed that relates to the respective personal data subject, and the source of such data, unless a different procedure for the provision of such data is established by federal law;
6. The duration of personal data processing, including the period of data storage;
7. The procedure for exercising the rights of the personal data subject as provided for by the Federal Law;
8. Information about any actual or intended cross-border transfer of personal data;
9. The name (or surname, first name, and patronymic) and address of the person processing personal data on behalf of the operator, if the processing is or will be entrusted to such a person;
10. Information on how the operator fulfills the obligations established by Article 18.1 of Federal Law No. 152-FZ of July 27, 2006 “On Personal Data”;
11. Other information as stipulated by Federal Law No. 152-FZ of July 27, 2006 “On Personal Data” or other federal laws.

The right of a personal data subject to access their personal data may be restricted in accordance with federal laws, including in the following cases:

- 1) The processing of personal data, including personal data obtained as a result of operational-search, counterintelligence, and intelligence activities, is carried out for the purposes of national defense, state security, and the maintenance of public order;
- 2) The processing of personal data is carried out by authorities that have detained the personal data subject on suspicion of committing a crime, have charged the personal data subject in a criminal case, or have applied a preventive measure to the personal data subject prior to formal charges being brought — except in cases provided for by the criminal procedural legislation of the Russian Federation where the suspect or accused is permitted to access such personal data;
- 3) The processing of personal data is carried out in accordance with legislation on countering the legalization (laundering) of proceeds of crime and the financing of terrorism;
- 4) The personal data subject’s access to their personal data infringes upon the rights and legitimate interests of third parties;
- 5) The processing of personal data is carried out in accordance with the legislation of the Russian Federation on transport security, for the purpose of ensuring the stable and secure functioning of the transport system and protecting the interests of individuals, society, and the state in the field of transport system from acts of unlawful interference.

The personal data subject has the right to:

request the rectification, blocking, or destruction of their personal data if such data is incomplete, outdated, inaccurate, unlawfully obtained, or not necessary for the stated purpose of processing, as well as to take other legal actions to protect their rights;

withdraw consent to the processing of personal data;

exercise other rights provided for by the legislation of the Russian Federation in the field of personal data.

To exercise their rights and legitimate interests, the personal data subject may contact the Association "BC "UMMC".

The Association "BC "UMMC" reviews inquiries and complaints from personal data subjects, thoroughly investigates any alleged violations, and takes all necessary measures to promptly eliminate such violations, hold the responsible parties accountable, and resolve disputes and conflicts through pre-trial settlement procedures.

The personal data subject has the right to appeal against the actions or inaction of the Association "BC "UMMC" by contacting the authorized body for the protection of personal data subjects' rights.

The personal data subject also has the right to protect their rights and legitimate interests, including through judicial proceedings.

11. Final provisions

This Policy has been developed by the Association "BC "UMMC" and approved by the order of the Director of the Association "BC "UMMC".

This Policy is an internal document of the Operator, is publicly accessible, and shall be published on the Operator's official website.

This Policy is subject to amendments and additions in the event of new legislative acts or special regulatory documents concerning the processing and protection of personal data.

Compliance with the requirements of this Policy is monitored by the persons responsible for ensuring the security of personal data.

The liability of the Operator's officials who have access to personal data for failure to comply with the requirements of the regulations governing the processing and protection of personal data is determined in accordance with the legislation of the Russian Federation and the internal documents of the Operator.