

COMPANY POLICY ON PERSONAL DATA PROCESSING

Moscow, 2017

1. GENERAL PROVISIONS

The Personal Data Processing Policy (hereinafter, the “Policy”) has been developed in accordance with Federal Law No. 152-ФЗ On Personal Data dated July 27, 2006 (hereinafter, “Federal Law 152”).

This Policy determines the procedure for processing Personal Data and the measures for ensuring the personal data security on the portal of the Hadassah University Hospital on the Internet website at

<https://hadassah.ru/> (hereinafter referred to as the “Operator”) with the aim of observing human and civil rights and freedoms of individuals when processing their Personal Data, including the protection of the rights to privacy, personal, and family secrets.

The following basic concepts are used in the Policy:

Automated Personal Data Processing shall mean the processing of Personal Data by using the computing hardware; **Personal Data Blocking** shall mean the temporary termination of the Personal Data Processing (except for cases when the processing is required to clarify Personal Data);

Personal Data Information System shall mean an aggregation of Personal Data — contained in the Personal Data databases — and the IT technologies and technical facilities ensuring Personal Data Processing;

Personal Data Anonymization shall mean actions resulting in the impossibility to attribute personal data to a specific Personal Data Subject without additional information;

Personal Data Processing shall mean any action (operation) or cumulative actions (operations) performed with Personal Data with or without the use of automation facilities, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction of Personal Data.

Operator shall mean a state authority, municipal authority, legal entity, or individual which arranges for and/or performs the Personal Data Processing, independently or in cooperation with other persons, 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** shall mean any information relating to a directly or indirectly identified or identifiable individual (Personal Data Subject);

Personal Data Provision shall mean actions aimed at disclosing personal data to a certain person or a certain circle of persons; **Personal Data Dissemination** shall mean any actions aimed at disclosing personal data to general public (personal data transfer) or at familiarizing general public with personal data, including the personal data disclosure in the media, posting in information and telecommunication networks, or otherwise providing access to personal data;

Personal Data Cross-Border Transfer shall mean transfer of personal data to a foreign state, to a foreign-state authority, to a foreign individual, or to a foreign legal entity; **Personal Data Destruction** shall mean actions resulting in the impossibility to restore the contents of personal data in the Personal Data Information System and/or in the destruction of hard copies of personal data.

The Company shall publish or otherwise provide unrestricted access to this Personal Data Processing Policy in accordance with Part 2 of Article 18.1 of Federal Law 152.

2. PRINCIPLES AND TERMS OF PERSONAL DATA PROCESSING

2.1. Personal Data Processing Principles

The personal data shall be processed based on the following principles:

- Legitimacy and fairness;
- Limiting the Personal Data Processing to the achievement of specific objectives which are predetermined and legitimate;
- Avoidance of Personal Data Processing incompatible with the purposes of the Personal Data collection;
- Avoidance of database combination, where such databases contain personal data that may be processed for mutually incompatible purposes;
- Processing of only those Personal Data that meet the purposes of processing thereof;
- Conformity of the content and volume of the processed Personal Data to the stated processing purposes.
- Avoidance of the processed Personal Data redundancy regarding the stated processing purposes;
- Ensuring the Personal Data accuracy, adequacy, and relevance regarding the processing purposes;
- Personal Data destruction or anonymization upon achievement of the processing purposes or in case of no further need to achieve these objectives, if the Operator is unable to eliminate the infringements of Personal Data unless otherwise provided for by the federal law.

2.2. Terms of Personal Data Processing

The Operator shall process personal data in the presence of at least one of the following conditions:

- The Personal Data are processed with the consent of the Personal Data Subject to the processing of their Personal Data;
- The Personal Data Processing is required to achieve the objectives provided for by an international treaty of the Russian Federation or the law, to exercise the functions, powers, and obligations imposed on the Operator by the legislation of the Russian Federation.
- The Personal Data Processing is required for the administration of justice, the enforcement of a judicial act, an act of another authority, or officer, which are subject to enforcement in accordance with the legislation of the Russian Federation on enforcement proceedings;
- The Personal Data Processing is required to perform an agreement whereto the Personal Data Subject is either a party, or a beneficiary, or a guarantor as well as for the conclusion of an agreement at the initiative of the Personal Data Subject or an agreement whereunder the Personal Data Subject will be a beneficiary or guarantor;
- The Personal Data Processing is required to exercise the rights and legitimate interests of the Operator or third parties or to achieve socially significant objectives, provided that the rights and freedoms of the Personal Data Subject are not infringed;
- The processing of Personal Data, whereto the general public access provided by

the Personal Data Subject or at their request (hereinafter, the “Publicly Available Personal Data”) is performed;

— The processing of Personal Data to publication or mandatory disclosure in accordance with the federal law is performed.

2.3. Personal Data Confidentiality

The Operator and other persons who have access to personal data are obliged to avoid disclosing personal data to third parties and distributing such without the consent of the Personal Data Subject unless otherwise provided for by the federal law.

2.4. Publicly Available Sources of Personal Data

For the purpose of information support, the Operator may create publicly available sources of the Subjects’ personal data, including directories and address books. Th publicly available sources of personal data may include, subject to a written consent of the Subject, their name, patronymic, surname, date and place of birth, position, contact telephone numbers, e-mail address, and other personal data provided by the Personal Data Subject.

Information on the Subject shall be deleted from publicly available sources of personal data at any time at the Subject’s request or at a decision of a court or other authorized state agencies.

2.5. Special Categories of Personal Data

The Operator shall not be allowed to process special categories of Personal Data relating to race, ethnical identity, political views, religious or philosophical beliefs, health status, and intimate life only in the cases where:

— The Personal Data Subject has provided a written consent to the processing of their Personal Data;

— The personal data have been made publicly available by the Personal Data Subject;

— The personal data are processed in accordance with the legislation on state social assistance, labor legislation, the legislation of the Russian Federation on state pension provision, on labor pensions;

— The Personal Data Processing is required to protect the life, health, or other vital interests of the Personal Data Subject or the life, health, or other vital interests of other persons, while obtaining the consent of the Personal Data Subject is impossible;

— The personal data are processed for medical and preventive purposes, for the purpose of a medical diagnosis, providing medical, clinical, and social services, provided that the personal data is processed by a person professionally engaged in medical activities and obliged to maintain medical secrecy in accordance with the legislation of the Russian Federation;

— The Personal Data Processing is required to establish or exercise the rights of the Personal Data Subject or third parties as well as in connection with the administration of justice;

— The personal data are processed in accordance with the legislation on mandatory types of insurance and the insurance legislation.

The processing of special categories of Personal Data shall be terminated immediately if the reasons for which the processing was performed have been eliminated unless otherwise stipulated by the federal law.

The Operator may process personal data on criminal record only in the cases and in accordance with the procedure determined by federal laws.

2.6. Biometric Personal Data

the Operator may process the information that characterizes the physiological and biological features of a person, which may be used to establish their identity, i.e., biometric personal data, only with the written consent of the Subject.

2.7. Assignment of Personal Data Processing to Another Person

The Operator may assign the Personal Data Processing to other person with the consent of the Personal Data Subject unless otherwise provided for by the federal law, on the grounds of an agreement concluded with this person. A person processing Personal Data on the Operator's assignment shall comply with the principles and rules for Personal Data Processing provided for by Federal Law 152.

2.8. Cross-Border Transfer of Personal Data

The Operator shall be obliged to ensure that the foreign state whereto it intends to transfer personal data ensures reliable protection of the rights of Personal Data Subjects prior to such transfer commencement.

The cross-border transfer of personal data to the territory of foreign states that do not provide adequate protection of the rights of Personal Data Subjects may be performed in the following cases:

- Subject to the written consent of the Personal Data Subject to the cross-border transfer of their personal data;
- Subject to the execution of an agreement whereto the Personal Data Subject is a party.

3. RIGHTS OF A PERSONAL DATA SUBJECT

3.1. Personal Data Subject's Consent to Personal Data Processing

The Personal Data Subject shall decide on the provision of their Personal Data and provide their consent to the processing freely, willingly, and in their interest. Consent to the Personal Data Processing may be provided by the Personal Data Subject or their representative in any form that allows confirming the fact of the receipt thereof unless otherwise stipulated by the federal law.

The Operator shall be charged with the obligation to provide evidence of obtaining the consent of the Personal Data Subject to the processing of their Personal Data or evidence of the existence of the grounds specified in Federal Law 152.

3.2. Rights of a Personal Data Subject

The Personal Data Subject may obtain information from the Operator regarding

the processing of their Personal Data unless such right is restricted in accordance with federal laws. The Personal Data Subject may require the Operator to clarify their Personal Data, block, or destroy them if the Personal Data are incomplete, outdated, inaccurate, obtained illegally, or not required for the stated purpose of processing as well as take measures provided for by law to protect their rights.

The Personal Data Processing for the purpose of promoting goods, works, services on the market by contacting a potential consumer directly using communication means, as well as for the purposes of political campaigning, shall be allowed only with the prior consent of the Personal Data Subject. The specified Personal Data Processing shall be deemed to have been performed without the prior consent of the Personal Data Subject unless the Company proves that such consent has been obtained.

At the request of the Personal Data Subject, the Operator shall terminate immediately their Personal Data Processing for the above purposes.

Making decisions based solely on Automated Personal Data Processing that entail legal consequences for the Personal Data Subject or otherwise affect their rights and legitimate interests, except in cases provided for by federal laws, or with the written consent of the Personal Data Subject, is prohibited.

If the Personal Data Subject believes that the Operator processes their personal data in violation of the requirements of Federal Law 152 or otherwise violates their rights and freedoms, the Personal Data Subject may file an appeal against the actions or omissions of the Operator to the Authorized Agency for the Protection of the Rights of Personal Data Subjects or appeal through judicial proceedings.

The Personal Data Subject shall be entitled to the protection of their rights and legal interests, including compensation for losses and/or compensation for moral damage through judicial proceedings.

4. ENSURING THE PERSONAL DATA SECURITY

The security of personal data being processed by the Operator shall be ensured through the implementation of legal, organizational, and technical measures required to comply with the requirements of the federal legislation on personal data protection.

To prevent unauthorized access to personal data, the Operator shall apply the following organizational and technical measures:

- Appointment of officers responsible for organizing the processing and protection of Personal Data;
- Restriction of the number of persons who have access to personal data;
- Familiarization of Subjects with the requirements of federal legislation and regulatory documents of the Operator for the processing and protection of Personal Data;
- Organization of accounting, storage, and circulation of information carriers;
- Identification of threats to the Personal Data security during processing, formation of threat models based thereon;
- Development of a personal data protection system based on the threat model;
- Verification of the readiness and efficiency of the use of information security tools;

- Differentiation of the users' access to information resources, software and hardware facilities used for information processing;
- Registration and accounting of actions of users of Personal Data Information Systems;
- Use of antivirus facilities and recovery facilities of the personal data protection system;
- Use of firewall protection, intrusion detection, security analysis, and cryptographic information protection facilities, if required;
- Organization of control of access to the Operator's territory, protection of premises with technical facilities of Personal Data Processing.

5. FINAL PROVISIONS

Other rights and obligations of the Operator as a personal data operator shall be determined by the legislation of the Russian Federation on personal data.

The Operator officers who are at fault of violating the provisions regulating the processing and protection of Personal Data shall bear financial, disciplinary, administrative, civil, or criminal liability in accordance with the procedure stipulated by federal laws.