



TRP Group

129164, Moscow, Rocket b-r, building 16, floor 3, room XXVII, rooms 8-22
TIN: 7704025036, KPP: 771701001

POLITICS
PROCESSING OF PERSONAL DATA
TRP-Group (JSC Schindler)

(New edition, 2022)

1. General information

1.1 The personal data processing policy (hereinafter referred to as the Policy) of TRP-Group (Joint-Stock Company Schindler) (hereinafter JSC Schindler, the Company) was developed in accordance with Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data" (hereinafter - FZ-152).

1.2 The Policy defines the procedure for processing personal data (PD) and measures to ensure the security of personal data in the Company in order to protect the rights and freedoms of a person and citizen in the processing of his personal data, including the protection of the rights to privacy, personal and family secrets.

1.3 The Company is obliged to publish or otherwise provide unrestricted access to this Policy.

1.4 This Policy uses the following basic concepts and definitions.

Term	Definition
Personal data	- Any information relating directly or indirectly to a specific or identifiable natural person (subject of personal data).
Processing of personal data	- Any action (operation) or set of actions (operations) performed with the use of automation tools or without the use of such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.
Automated processing of personal data	- Processing of personal data using computer technology.
Blocking personal data	- Temporary termination of the processing of personal data (unless the processing is necessary to clarify personal data).
Information system of personal data	- The totality of personal data contained in databases and information technologies and technical means that ensure their processing.
Depersonalization of personal data	- Actions as a result of which it is impossible to determine, without the use of additional information, the ownership of personal data by a specific subject of personal data.
Blocking personal data	- Temporary suspension of the collection, systematization, accumulation, use, distribution of personal data, including their transfer.
Personal data operator	- State body, municipal body, legal entity or individual, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.
Providing personal data	- Actions aimed at disclosing personal data to a certain person or a certain circle of persons.
Dissemination of personal data	- Actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or familiarizing with personal data of an unlimited number of persons, including the disclosure of personal data in the media, placement in information and telecommunication networks or providing access to personal data to any or otherwise.
Cross-border transfer of personal data	- Transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

Destruction of personal data	-	Actions as a result of which it is impossible to restore the content of personal data in the information system of personal data and (or) as a result of which material carriers of personal data are destroyed.
Operator	-	a legal entity, independently or jointly with other persons, organizing and (or) carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.
cookie	-	a small piece of data sent by a web server and stored on the User's computer, which the web client or web browser sends to the web server in an HTTP request each time it tries to open the page of the corresponding site.
IP address	-	a unique network address of a node in a computer network built using the IP protocol.

1.5 The requirements of this Policy apply to all employees of the Company (full-time, temporary, contract workers), family members of employees, candidates for vacant positions, counterparties, Users.

2. Rights of the subject of personal data

2.1 The subject of personal data has the right to receive information from the Company regarding the processing of his personal data, unless such right is restricted in accordance with federal laws. The subject of personal data has the right to demand from the Company the clarification of his personal data, their blocking or destruction if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as take measures provided by law to protect their rights.

2.2 The processing of personal data in order to promote goods, works, services on the market by making direct contacts with a potential consumer using means of communication, as well as for the purposes of political campaigning, is allowed only with the prior consent of the subject of personal data. The specified processing of personal data is recognized as being carried out without the prior consent of the subject of personal data, unless the Company proves that such consent has been obtained.

2.3 It is prohibited to make decisions on the basis of exclusively automated processing of personal data that give rise to legal consequences in relation to the subject of personal data or otherwise affect his rights and legitimate interests, except as otherwise provided by federal laws, or with the written consent of the subject of personal data.

2.4 If the subject of personal data believes that the Company is processing his personal data in violation of the requirements of Federal Law-152 or otherwise violates his rights and freedoms, the subject of personal data has the right to appeal against the actions or inaction of the Company in the Authorized body for the protection of the rights of subjects of personal data or in court.

2.5 The subject of personal data has the right to protect his rights and legitimate interests, including compensation for losses and (or) compensation for moral damage in court.

3. Purposes of collecting personal data

3.1 The Company processes personal data for the following purposes:

- Compliance with labor legislation in relation to the Company's employees, as well as their family members, including for the purposes of employment, training, promotion, labor protection and personal safety of the employee, quality control of work performed, remuneration in accordance with the requirements of laws and other regulatory documents, organization of business trips, as well as ensuring the safety of property.
- Employment of candidates during their selection for vacant positions of the Company.
- Execution of contracts of a civil law nature with agents-individuals.

– Interaction with Users of its official website (hereinafter referred to as the Site) located in the information and telecommunications network "Internet" (hereinafter referred to as the "Internet") at the address: trp-group.ru.

– Improving the quality of the Site and its content.

– Use of contact details of representatives of potential customers of the Company in order to promote goods, works, services, subject to the prior consent of the subject of personal data.

– Interaction within the framework of contractual relations with the counterparties of the Company.

3.2 The Company does not allow the processing of personal data that is incompatible with the purposes of collecting personal data.

4. The content of the processing of personal data of certain categories of subjects of personal data

4.1. Processing of personal data workers

4.1.1. The personal data of an employee in the Company are processed in order to comply with labor laws, including for the purposes of employment, training, promotion, labor protection and personal safety of the employee, quality control of work performed, remuneration in accordance with the requirements of laws and other regulatory documents, organization business trips, as well as ensuring the safety of property.

4.1.2. Personal data of the employee processed by the Operator:

- surname, name and patronymic;
- floor;
- Date and place of birth;
- passport data;
- citizenship;
- address of the place of registration and actual residence;
- details of a document confirming the right to stay on the territory of the Russian Federation (for a foreign citizen);
- migration card information (for a foreign citizen);
- information about a work permit or a patent (for a foreign citizen);
- information about the employee's status as a highly qualified specialist (for a foreign citizen);
- information about marital status and family composition;
- information of documents on education and advanced training;
- information about knowledge of foreign languages;
- information about labor and general work experience;
- information about previous jobs;
- information about military service;
- driving license information (for drivers of vehicles);
- insurance number of an individual personal account (SNILS);
- individual taxpayer number (TIN);
- tax status;
- information of the policy of voluntary medical insurance (VMI);
- information on the absence of medical contraindications for the employee to work in a position associated with harmful and (or) dangerous production factors and work);
- position held;
- place of work (organization);
- Personnel Number;
- information about wages and other income;
- current account information;

- contact phone number;
- E-mail address;
- the photo.

4.1.3. The legal grounds for processing personal data of employees in the Company are:

- an employment contract to which the Employee is a party;
- Labor Code of the Russian Federation dated December 30, 2001 No. 197-FZ;
- Civil Code of the Russian Federation (Part 1) dated November 30, 1994 No. 51-FZ;
- Tax Code of the Russian Federation dated July 31, 1998 No. 146-FZ;
- Federal Law No. 402-FZ of December 16, 2011 “On Accounting”;
- Federal Law No. 167-FZ of December 15, 2001 “On Compulsory Pension Insurance in the Russian Federation”;
- Federal Law No. 323-FZ of November 21, 2011 “On the Fundamentals of Protecting the Health of Citizens in the Russian Federation”;
- Federal Law of July 27, 2006 No. 152-FZ “On Personal Data”.

4.1.4. The Company processes the employee's personal data with and without the use of automation tools, including the operations of collecting, recording, systematizing, accumulating, storing, clarifying (updating, changing), extracting, using, transferring (providing, accessing), depersonalizing, blocking, deleting, destroying personal data.

4.1.5. The written consent of the employee must be obtained, unless otherwise provided by federal law, in the following cases:

- to obtain personal data from a third party;
- to transfer personal data to a third party;
- to transfer certain personal data to the category of publicly available;
- to process special categories of personal data about race, nationality, political views, religious and philosophical beliefs;
- for the processing of biometric personal data;
- for the use of personal data in order to promote goods, works, services, as well as for the purposes of political campaigning;
- when entrusting the processing of personal data to another person;
- if it is necessary to make decisions on the basis of exclusively automated processing of personal data that give rise to legal consequences;
- if necessary, cross-border transfer of personal data, if this is not a condition of the employment contract.

4.2. Processing of personal data of employees' family members

4.2.1. The personal data of a family member (in his absence, a close relative) of an employee is processed in order to comply with labor legislation in relation to an employee of the Company.

4.2.2. Personal data of the employee's family members processed by the Operator:

- Full Name;
- Date and place of birth;
- relation degree;
- information about the state of health (about disability, pregnancy, etc.);
- contact phone number;
- residence address.

4.2.3. The legal grounds for processing personal data of family members of employees in the Company are:

- Labor Code of the Russian Federation dated December 30, 2001 No. 197-FZ;
- Federal Law of July 27, 2006 No. 152-FZ “On Personal Data”.

4.2.4. The Company processes the personal data of a family member with and without the use of automation tools, including the operations of collecting, recording, systematizing, accumulating, storing, clarifying (updating, changing), extracting, using, depersonalizing, blocking, deleting, destroying personal data.

4.2.5. The consent of a family member must be obtained, unless otherwise provided by federal law, in the following cases:

- to transfer personal data to a third party;
- if necessary, cross-border transfer of personal data.

4.2.6. The terms of storage of personal data of family members of employees correspond to the terms of storage of personnel and accounting documents containing personal data of an employee.

4.3. Processing of personal data of candidates for vacant positions

4.3.1. The purpose of processing personal data of candidates for vacant positions in the Company is the employment of candidates during their selection for vacant positions in the Company.

4.3.2. Personal data of candidates for vacant positions processed by the Operator:

- surname, name and patronymic;
- Date of Birth;
- floor;
- citizenship;
- marital status;
- address of the place of registration and actual residence;
- information about education and advanced training;
- details of a document confirming the right to stay on the territory of the Russian Federation (for a foreign citizen);
- migration card information (for a foreign citizen);
- work permit information (for a foreign citizen);
- information about previous jobs;
- information about knowledge of foreign languages;
- information about the presence of a driver's license;
- information about the presence of the car;
- information about professional skills and abilities;
- contact phone number;
- E-mail address;
- the photo.

4.3.3. The legal grounds for processing personal data of candidates for vacant positions in the Company are:

- Candidate's consent to the processing of personal data;
- Federal Law of July 27, 2006 No. 152-FZ “On Personal Data”.

4.3.4. The Company processes the candidate's personal data with and without the use of automation tools, including the operations of collecting, recording, systematizing, accumulating, storing, clarifying (updating, changing), extracting, using, transferring (providing, accessing), depersonalizing, blocking, deleting, destroying personal data.

4.3.5. The consent of the candidate is not obtained if the applicant independently posts his resume on the Internet, accessible to an unlimited circle of people. The consent of the candidate is not obtained if the candidate's resume is received from recruitment agencies (the obligation to obtain consent lies with the recruitment agency).

4.3.6. The processing of the candidate's personal data is limited to achieving the purpose of processing - making a decision on the candidate's employment. In the event of a negative decision on employment, documents containing the candidate's personal data (questionnaire, letters of recommendation, resumes, etc.) are destroyed within thirty days, if the Company has not received consent to further processing of his personal data.

4.3.7. Written consent must be obtained from the candidate in the following cases:

- saving the resume of the candidate, containing his personal data, as a personnel reserve of the Company;
- if there is a need to obtain (clarify) the candidate's personal data from a third party;
- for the processing of biometric and special categories of personal data;

–in case of cross-border transfer of the candidate's personal data.

4.4. Processing of personal data of counterparties

4.4.1. The purposes of processing the personal data of the counterparty in the Company are:

–Execution of civil law contracts (use of contact details of persons responsible for the execution of the contract).
–Use of contact details of representatives of potential customers of the Company in order to form technical and commercial proposals.

4.4.2. Personal data of the counterparty processed by the Operator:

–surname, name and patronymic;
–Date and place of birth;
–passport data;
–address of the place of registration;
–TIN;
–SNILS;
–data of the Certificate of entry into the Unified State Register of Individual Entrepreneurs (if the agent is an individual entrepreneur);
–bank account number for transferring payment under the contract;
–contact number;
–E-mail address.

4.4.3. The legal grounds for processing the counterparty's personal data in the Company are:

–A civil law contract to which the counterparty is a party;
–Civil Code of the Russian Federation (Part 1) dated November 30, 1994 No. 51-FZ;
–Tax Code of the Russian Federation dated July 31, 1998 No. 146-FZ;
–Federal Law No. 402-FZ of December 16, 2011 “On Accounting”;
–Federal Law No. 167-FZ of December 15, 2001 “On Compulsory Pension Insurance in the Russian Federation”;
–Federal Law of July 27, 2006 No. 152-FZ “On Personal Data”.

4.4.4. The Company processes the personal data of the counterparty with and without the use of automation tools, including the operations of collecting, recording, systematizing, accumulating, storing, clarifying (updating, changing), extracting, using, transferring (providing, accessing), depersonalizing, blocking, deleting, destroying personal data.

4.4.5. Obtaining the consent of the counterparty is necessary in the following cases:

–to transfer personal data to a third party;
–if necessary, cross-border transfer of personal data, if this is not provided for by a civil law contract;
–when processing personal data in order to promote goods, works, services on the market.

4.5. Processing of the User's personal data

4.5.1. The purposes of processing the User's personal data in the Company are:

–processing of the e-mail address, phone number and name of the User - is carried out for feedback from the User who left the application on the Site;
–processing of the User's address or delivery address, bank account details - is carried out for invoicing and delivery of the Goods ordered through the Site to the User;
–notification of the User about new products and services, special offers and various events (the User can always refuse to receive informational messages by sending an email to the Operator at: service.ru@trp-group.ru).
–the collection of depersonalized data of the User (including Cookie files) using Internet statistics services (such as: Yandex Metrica) is carried out to obtain information about the actions of Users on the Site, improve the quality of the Site and its content. The cookie processing policy can be found on the Website: trp-group.ru.

4.5.2. The User's personal data processed by the Operator:

–User's email address;
–User's address or delivery address (in case of ordering goods through the Site);
–phone number of the User;

- User's name (for individuals - full name; for legal entities - name, OGRN, TIN);
- gender (for – for individuals);
- age (for - for individuals);
- bank account details (in case of ordering goods through the Site);
- Cookies.

4.5.3. The legal grounds for processing the User's personal data in the Company are:

- the use of the Site by the User, namely, at the moment of clicking the checkmark in the feedback form on the Site and clicking the "Submit" button - the User confirms that he is familiar with this Policy and agrees to its terms. The Company processes the User's personal data only if they are sent by the User through the forms located on the Site;
- the use of the Site by the User, namely, at the moment of clicking "ok" in the Notification Window on the processing of Cookies that appears when visiting the Site - the User agrees to the processing of his Cookies.
- international treaties of the Russian Federation, federal laws and by-laws of the Russian Federation, defining the cases and features of the processing of personal data and ensuring the security and confidentiality of such information.

4.5.4. The Company processes the User's personal data with and without the use of automation tools, including the operations of collecting, recording, systematizing, accumulating, storing, clarifying (updating, changing), extracting, using, transferring (providing, accessing), depersonalizing, blocking, deleting, destroying personal data.

4.5.5. Obtaining the consent of the User is necessary in the following cases:

- to transfer personal data to a third party;
- if necessary, cross-border transfer of personal data.

4.5.6. In case of disagreement with the terms of the Policy, the User must stop using the Site.

4.5.7. This Policy applies only to the Site: trp-group.ru.

4.5.8. The Operator does not control and is not responsible for the websites of third parties, to which the User can follow the links available on the Website.

4.5.9. The Operator does not verify the accuracy of personal data provided by the User of the Site.

4.5.10. The Operator processes anonymized data about the User if it is allowed in the User's browser settings (saving of cookies is enabled).

5. Legal grounds for the processing of personal data

5.1 The Company processes personal data on the basis of:

– Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data; the Constitution of the Russian Federation; Labor Code of the Russian Federation; Civil Code of the Russian Federation; Tax Code of the Russian Federation; Code of Administrative Offenses of the Russian Federation; Criminal Code of the Russian Federation; Federal Law No. 402-FZ of 06.12.2011 "On Accounting", Federal Law of 05.05. 2014 No. 116-FZ "On Amendments to Certain Legislative Acts of the Russian Federation"; Federal Law of July 27, 2006 N 149-FZ "On Information, Information Technologies and Information Protection", and other international treaties of the Russian Federation; Decree of the Government of the Russian Federation of 01.11.2012 N 1119 "On approval of requirements for the protection of personal data during their processing in information systems of personal data"; Decree of the Government of the Russian Federation of September 15, 2008 No. 687 "On Approval of the Regulations on the Features of the Processing of Personal Data Carried Out Without the Use of Automation Tools"; Order of the FSTEC of Russia dated February 18, 2013 N 21 "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"; and other federal laws and by-laws of the Russian Federation,

– the Articles of Association of the Society;

– contracts concluded between the Company and the subject of personal data and separate consents to the processing of personal data (in cases not expressly provided for by the legislation of the Russian Federation, but corresponding to the powers of the Company), as well as contracts with counterparties, under the terms of which the counterparty is obliged to obtain consent from its employees for processing of personal data by the Company in order to fulfill the contract;

- the use of the Site by the User, namely, at the moment of clicking the checkmark in the feedback form on the Site and clicking the "Submit" button - the User confirms that he is familiar with this Policy and agrees to its terms;
- the use of the Site by the User, namely, at the moment of clicking “ok” in the Notification Window about the processing of Cookies that appears when visiting the Site, the User agrees to the processing of his Cookies.

6. Scope and categories of processed personal data, categories of personal data subjects

6.1 The Company processes personal data of the following categories of personal data subjects:

- employees - individuals who are or were in labor relations with the Company;
- family members of employees - individuals who are in family or related relations with the employees of the Company (hereinafter referred to as family members);
- candidates for vacant positions - individuals applying for filling vacant positions in the Company (hereinafter referred to as candidates);
- counterparties – individuals who provide services to the Company and perform work on the basis of civil law contracts, or representatives of potential clients of the Company (hereinafter referred to as the counterparties);
- Users - persons who have access to the Site and use it through the Internet.

6.2 The Company processes personal data of the following categories:

- others;
- public;
- biometric.

6.3 Processing by the Company of biometric personal data, such as photographs, fingerprints and other physiological features, as well as the processing of special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, health status, intimate life, is allowed in cases where:

- the subject of personal data has consented in writing to the processing of this personal data;
- personal data is made public by the subject of personal data;
- the processing of personal data is carried out in accordance with the legislation on state social assistance, labor legislation, the legislation of the Russian Federation on state pensions, labor pensions;
- processing of personal data is carried out in accordance with the legislation on compulsory types of insurance, with insurance legislation.

6.4 For the purpose of information support, the Company creates publicly available sources of personal data of subjects, including directories and address books. Publicly available sources of personal data, with the written consent of the subject, may include his last name, first name, patronymic, date and place of birth, position, contact phone numbers, e-mail address, photograph and other personal data reported by the subject of personal data.

6.5 Analytical data about visitors to the Company's Website.

The Company also processes technical and other information that is automatically transmitted by the device with which the user uses the Site, including information stored in Cookie files that were sent to the device, information about the browser and its settings, date and time of access to the web site. site, addresses of requested pages and user actions on the Site, technical characteristics of the device, IP address and other similar information (hereinafter referred to as "analytical data about Site visitors").

7. The procedure and conditions for the processing of personal data

7.1 The processing of personal data in the Company is carried out on the basis of the following principles:

- legitimacy and fairness;
- limiting the processing of personal data to the achievement of specific, predetermined and legitimate purposes;
- preventing the processing of personal data that is incompatible with the purposes of collecting personal data;

–preventing the merging of databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other;

–processing only those personal data that meet the purposes of their processing;

–compliance of the content and volume of the processed personal data with the stated purposes of processing;

–preventing the processing of personal data that is excessive in relation to the stated purposes of their processing;

–ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of processing personal data;

–destruction or depersonalization of personal data upon reaching the goals of their processing or in case of loss of the need to achieve these goals, if it is impossible for the Company to eliminate the committed violations of personal data, unless otherwise provided by federal law.

7.2 The Company processes personal data in the presence of at least one of the following conditions:

–the processing of personal data is carried out with the consent of the subject of personal data to the processing of his personal data;

–the processing of personal data is necessary to achieve the goals stipulated by an international treaty of the Russian Federation or the law, to exercise and fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation;

–the processing of personal data is necessary for the performance of an agreement to which the subject of personal data is a party or beneficiary or guarantor, as well as to conclude an agreement on the initiative of the subject of personal data or an agreement under which the subject of personal data will be the beneficiary or guarantor;

–the processing of personal data is necessary to exercise the rights and legitimate interests of the Operator or third parties or to achieve socially significant goals, provided that the rights and freedoms of the subject of personal data are not violated;

–processing of personal data is carried out, the access of an unlimited number of persons to which is provided by the subject of personal data or at his request (hereinafter referred to as publicly available personal data);

–processing of personal data subject to publication or mandatory disclosure in accordance with federal law.

7.3 The Company performs the following actions with personal data: collection; record; systematization; accumulation; storage; clarification (update, change); extraction; usage; transfer (provision, access); depersonalization; blocking; removal; destruction.

7.4 The processing of PD in the Company can be carried out both with and without the use of automation tools.

7.5 Processing of PD in the Company can be carried out:

–employees of the Company;

–other persons processing PD on behalf of the Company.

7.6 Processing of PD by other persons can be carried out only on the basis of an appropriate agreement with the Company, which contains an instruction for the processing of PD. The order defines a list of actions (operations) with personal data that will be performed by the person processing personal data and the purposes of processing, and establishes the obligation of such a person to maintain the confidentiality of PD and ensure the security of PD during their processing.

7.7 In order to achieve the purposes of processing, the Company may transfer personal data and entrust their processing to third parties, including on the territory of foreign states. In this case, the Company is obliged to make sure that the foreign state, to whose territory the personal data is transferred, provides adequate protection of the rights of personal data subjects.

7.8 Cross-border transfer of personal data on the territory of foreign states is carried out by the Company in the following cases:

–the consent of the subject of personal data to the cross-border transfer of his personal data;

–performance of an agreement to which the subject of personal data is a party.

7.9 The Company and other persons who have gained access to personal data are obliged not to disclose to third parties and not to distribute personal data without the consent of the subject of personal data, unless otherwise provided by federal law.

7.10 The security of personal data processed by the Company is ensured by the implementation of legal, organizational and technical measures necessary to ensure the requirements of federal legislation in the field of personal data protection.

7.11 To prevent unauthorized access to personal data, the Company applies the following organizational and technical measures provided for by the Federal Law "On Personal Data":

- appointment of a person responsible for organizing the processing of personal data in the Company;
- adoption of local regulations and other documents in the field of processing and protection of personal data;
- familiarization of employees directly involved in the processing of personal data with the provisions of the legislation of the Russian Federation on personal data, local acts on the processing of personal data;
- obtaining consents of personal data subjects to the processing of their personal data, except as otherwise provided by the legislation of the Russian Federation;
- identification of threats to the security of personal data during their processing in information systems;
- development of a personal data protection system;
- the use of information security tools that have passed the procedure for assessing compliance with the requirements of the legislation of the Russian Federation in the field of information security, in the case when the use of such tools is necessary to neutralize current threats;
- accounting of machine carriers of personal data;
- separation of personal data processed without the use of automation tools from other information, in particular by fixing them on separate material carriers of personal data, in special sections;
- verification of the effectiveness of the use of information security tools;
- differentiation of user access to information resources and software and hardware for processing and protecting information;
- detection of facts of unauthorized access to personal data and taking measures;
- recovery of personal data modified or destroyed due to unauthorized access to them;
- establishing rules for access to personal data, ensuring registration and accounting of actions with personal data during their processing in information systems;
- organization of access control to the territory of the Company, protection of premises with technical means for processing personal data.
- ensuring separate storage of personal data and their material carriers, the processing of which is carried out for different purposes and which contain different categories of personal data;
- ensuring the security of personal data during their transmission through open communication channels;
- storage of material carriers of personal data in compliance with the conditions that ensure the safety of personal data and exclude unauthorized access to them;
- implementation of internal control over the compliance of personal data processing with the Federal Law “On Personal Data” and the regulatory legal acts adopted in accordance with it, the requirements for the protection of personal data, this Policy, local regulations of the Company;
- other measures provided for by the legislation of the Russian Federation in the field of personal data and the EU Regulation;

7.12 measures to ensure the security of personal data when they are processed in personal data information systems are established in accordance with the Company's local regulations governing the issues of ensuring the security of personal data when they are processed in personal data information systems of the Company.

7.13 The condition for terminating the processing of personal data by the Company is the achievement of the goals of processing personal data, the expiration of the consent or withdrawal of the consent of the subject of personal data to the processing of his personal data, as well as the identification of unlawful processing of personal data.

7.14 The storage of personal data is carried out in a form that allows determining the subject of personal data for no longer than is required by the purposes of processing personal data, except when the period for storing personal data is established by an agreement to which the subject of personal data is a party, beneficiary or guarantor, or federal law . In

the latter case, the terms of processing (storage) of PD are determined in accordance with the limitation period, as well as other terms established by the legislation of the Russian Federation and local regulatory documents of the Company.

7.15 When processing personal data, the Company uses databases located on the territory of the Russian Federation, in accordance with Part 5 of Art. 18 of the Federal Law "On Personal Data".

8. Updating, correction, deletion and destruction of personal data, responses to requests from subjects for access to personal data

8.1 In case of confirmation of the fact of inaccuracy of personal data or the illegality of their processing, personal data is subject to updating by the Company, and processing must be terminated, respectively.

8.2 Upon reaching the goals of processing personal data, as well as in the event that the subject of personal data withdraws consent to their processing, personal data shall be destroyed if:

– otherwise is not provided by the contract, the party to which, the beneficiary or the guarantor of which is the subject of personal data;

– The Company is not entitled to process without the consent of the subject of personal data on the grounds provided for by the Federal Law "On Personal Data" or other federal laws;

– otherwise is not provided by another agreement between the Company and the subject of personal data.

8.3 AtIf you have any questions regarding the processing of personal data, the subject of personal data may contact TRP-Group (JSC Schindler) at the email address: service.ru@trp-group.ru, or by sending a letter to the legal address: 129164, Moscow, Rocket Boulevard, 16

9. Final provisions

9.1 Before applying to the court with a claim for disputes arising from the relationship between the subjects of this Policy, it is mandatory to file a claim (a written proposal for a voluntary settlement of the dispute).

9.2 The recipient of the claim, within 30 calendar days from the date of receipt of the claim, notifies the claimant in writing of the results of the consideration of the claim.

9.3 If an agreement is not reached, the dispute will be referred to the judicial authority in accordance with the current legislation of the Russian Federation, or another body whose competence includes consideration of such disputes in accordance with the current legislation.

9.4 The current legislation of the Russian Federation applies to this Policy and the relations between the subjects of this Policy.

9.5 Other rights and obligations of the Company as a personal data operator are determined by the legislation of the Russian Federation in the field of personal data.

9.6 Officials of the Company guilty of violating the rules governing the processing and protection of personal data bear material, disciplinary, administrative, civil or criminal liability in accordance with the procedure established by federal laws.

9.7 JSC Schindler has the right to make changes to this Policy at its sole discretion.

9.8 The new Policy comes into force from the moment it is posted on the Site, unless otherwise provided by the new version of the Policy.

9.9 The current Policy is posted on the Website: trp-group.ru.