

POLICY
for processing of personal data
in the Rosatom Middle East and North Africa FZ LLC

Table of Contents

1. Purpose and scope	3
2. Terms and Definitions	3
3. Principles and objectives for processing of processing of personal data.....	4
4. The list of subjects whose personal data are processing in Company	5
5. List of personal data processed in Company	5
6. Company functions for processing of personal data.....	6
7. Conditions for processing of personal data in Company	6
8. The list of actions with personal data and methods for its processing	7
9. Rights of personal data subjects	7
10. Measures taken by Company to ensure the performance of operator duties for processing of personal data	8
11. Control of compliance with the legislation of the UAE and local regulatory acts of Company in the field of personal data, including requirements for protection of personal data.....	8
12. Normative references	9

1. Purpose and scope

1.1. A policy for processing of personal data in the Rosatom Middle East and North Africa FZ LLC (hereinafter referred to as the Policy) defines the basic principles, goals, conditions and methods for processing of personal data, lists of subjects and personal data processed in Rosatom Middle East and North Africa FZ LLC (hereinafter referred to as Company), Company options for processing of personal data, the rights of personal data subjects, as well as the requirements for personal data protection implemented in the Company.

1.2. The policy was developed taking into account the requirements of legislative and other regulatory legal acts of the UAE in the field of personal data.

1.3. The provisions of the Policy provide the basis for the development of local regulations governing processing of personal data of the Company employees and other personal data.

2. Terms and Definitions

Term	Definition
Automated processing of personal data	processing of personal data using a computer engineering means
Blocking of personal data	temporary cessation of processing of personal data (unless processing is necessary to clarify personal data)
Personal data Information System	set of personal data contained in databases and processing technologies and technical means ensuring their processing
Information	information (messages, data) regardless of form of their presentation.
Depersonalization of personal data	actions, as a result of which it becomes impossible, without using additional information, to determine the ownership of personal data to a specific subject of personal data
Processing of personal data	any action (operation) or set of actions (operations) performed using automation means or without using such means for processing of personal data, including collection, recording, systematization, accumulation, storage, refinement (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data
Operator	state body, municipal body, legal or natural person, independently or with other persons organizing and (or) processing personal data, as well as determining the purposes of processing of personal data, the composition of personal data to be processed, actions (operations) performed with personal data

Personal data	any information relating to directly or indirectly determined or designated individual (subject of personal data)
Provision of personal data	actions aimed at personal data disclosing to a specific person or a certain group of persons
Cross-border transfer of personal data	transfer of personal data to the territory of a foreign state
Destruction of personal data	actions, as a result of which it becomes impossible to restore the content of personal data in the information system of personal data and (or) as a result of which the material carriers of personal data are destroyed

3. Principles and objectives for processing of processing of personal data

3.1. Company, being an operator of personal data, processes personal data of the Company employees and other subjects of personal data who are not in an employment relationship with a Company.

3.2. The processing of personal data in the Company is carried out taking into account the need to ensure the protection of the rights and freedoms of employees of the Company and other subjects of personal data, including the protection of the right to personal and family privacy, based on the following principles:

processing of personal data is carried out in the Company on a lawful and fair basis;

processing of personal data is limited to the achievement of specific, predetermined and legitimate goals;

processing of personal data that is incompatible with the purposes of collecting personal data is not allowed;

database integration that contains personal data that are processed for purposes incompatible with each other is not allowed;

only personal data are processed that meets the purposes of their processing;

content and volume of processed personal data is consistent with the stated processing objectives. The redundancy of the processed personal data in relation to the stated purposes of their processing is not allowed;

processing of personal data ensures the accuracy of personal data, its sufficiency, and, if necessary, relevance in relation to the purposes of processing of personal data. The Company is taking necessary measures or ensuring their adoption to remove or clarify incomplete or inaccurate personal data;

personal data is stored in a form that allows determining the subject of personal data no longer than the purpose of processing personal data requires, unless the period for storing personal data is established by federal law, an agreement to which the beneficiary or guarantor is personal data subject

The processed personal data is destroyed or depersonalized upon the achievement of processing objectives or in the event of the loss of the need to achieve these objectives, unless otherwise provided by federal law.

3.3. Personal data is processed in the Company in order to:

- ensuring compliance of legislative and other regulatory legal acts of the UAE, local regulations of the State Corporation Rosatom and the Company;
- implementation of functions, powers and responsibilities assigned by legislation of the UAE to Company, including the provision of personal data to state authorities, the Federal Medical Insurance Fund, as well as other state bodies;
- regulation of labor relations with Company employees (employment assistance, training and promotion, ensuring personal safety, monitoring the quantity and quality of work performed, ensuring the safety of property);
- the provision of additional guarantees and compensations to employees of Company and members of their families, including non-state pension coverage, voluntary medical insurance, medical care and other types of social security;
- protection of life, health or other vital interests of personal data subjects;
- preparation, conclusion, execution and termination of contracts with counterparties;
- ensure access and internal security policy at Company facilities;
- formation of reference materials for the internal information support of Company activity, production branches and representative offices;
- execution of judicial acts, acts of other bodies or officials subject to execution in accordance with the legislation of the UAE about enforcement proceedings;
- implementation of rights and legitimate interests of Company in the framework of the implementation of activities stipulated by the Charter and other local regulatory acts of Company, or third parties, or the achievement of socially significant goals;
- for other legitimate purposes.

4. The list of subjects whose personal data are processing in Company

Company processes the personal data of the following subject categories:

- Company workers;
- other subjects of personal data (to ensure the implementation of the processing objectives specified in section 5 of the Policy).

5. List of personal data processed in Company

5.1. The list of personal data processed in Company is determined in accordance with the legislation of the UAE, local regulatory acts of the State Atomic Energy Corporation ROSATOM and the Company based on the purposes of processing personal data specified in section 4 of the Policy.

5.2. Special categories of personal data relating to ethnicity, nationality, political views, religious or philosophical beliefs, intimate life are not processed in the Company.

6. Company functions for processing of personal data

Company for processing of personal data:

takes necessary and sufficient measures to ensure compliance with the requirements of the UAE legislation and local regulatory acts of Company in the field of processing of personal data;

takes legal, organizational and technical measures to protect personal data from unlawful or accidental access, destruction, alteration, blocking, copying, provision, disclosing of personal data, as well as from other illegal actions in relation to personal data;

appoints the person responsible for organizing the processing of personal data in Company;

publishes local regulations defining policies and issues of processing and protection of personal data in the Company;

carries out familiarization of employees of the Company with direct processing of personal data with the provisions of the UAE legislation, local regulations of ROSATOM and Company in the field of personal data, including requirements for the protection of personal data, and training of its employees;

publishes or otherwise provides unrestricted access to this Policy;

informs the subjects of personal data or their representatives about the availability of personal data related to the relevant subjects in prescribed manner, provides an opportunity to familiarize themselves with this personal data when accessing and (or) receiving requests from specified personal data subjects or their representatives, unless otherwise provided by the UAE legislation;

stops processing and destroys personal data in cases stipulated by the UAE legislation in the field of personal data;

performs other actions stipulated by the UAE legislation in the field of personal data.

7. Conditions for processing of personal data in Company

7.1. Processing of personal data in Company with the consent of the subject of personal data to the processing of his personal data, unless otherwise provided by the UAE legislation in the field of personal data;

7.2. Company without the consent of the subject of personal data does not disclose to third parties and does not distribute personal data, unless otherwise provided by federal legislation.

7.3. Company is entitled to entrust the processing of personal data on the basis of a contract concluded with person. The contract should contain a list of actions (operations) with personal data that will be performed by the person that performs processing of personal data, processing purposes, the obligation of such person to maintain the confidentiality of personal data and for ensuring the safety of personal data

during its processing, as well as requirements for the protection of personal data being processed.

7.4. For the purpose of internal information support, Company may create internal reference materials, which, with the written consent of the subject of personal data, unless otherwise provided by the UAE legislation, may include his full name, place of work, position, year and place of birth, address, telephone line number, E-mail, other personal data reported by the subject of personal data.

7.5. Access to personal data processed in Company is allowed only to employees of Company holding positions included in the list of Company posts, which are replaced when personal data are processed.

8. The list of actions with personal data and methods for its processing

8.1. Company collects, records, organizes, stores, refines (updates, changes), retrieves, uses, transfers (distributes, provides, accesses), remodel, blocks, deletes and destroys personal data.

8.2. Processing of personal data in Company is carried out in the following ways:
manual processing of personal data;
automated processing of personal data with or without transferring the information received through Internet and telecommunication networks;
mixed processing of personal data.

9. Rights of personal data subjects

9.1. Personal data subjects are entitled to:
complete information about their personal data processed in Company;
access to their personal data, including the right to receive a copy of any record containing their personal data, except as required by the UAE legislation, as well as access to relevant medical data with the help of a medical specialist of their choice;
clarification of their personal data, their blocking or destruction if personal data are incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;
withdrawal of consent to the processing of personal data;
taking measures provided by law to protect their rights;
appeal against actions or omissions of the Company, carried out in violation of the requirements of the UAE legislation in the field of personal data, with the authorized body for protection of the rights of personal data subjects or in court
exercise other rights stipulated by the UAE legislation.

10. Measures taken by Company to ensure the performance of operator duties for processing of personal data

10.1 Measures that are necessary and sufficient to ensure that Company fulfills the operator's duties as stipulated by the UAE legislation in the field of personal data include:

- appointment of a person responsible for organizing of processing of personal data in Company;

- adoption of local regulations and other documents in the field of processing protection of personal data;

- organization of training and conducting methodological work with employees of Company, which occupy positions included in the list of Company posts, during the substitution of which personal data is processed

- obtaining the consent of personal entities for processing of their personal data, except as required by the UAE legislation;

- separation of personal data processed without the use of automation, from other information, in particular, by fixing them on separate material carriers of personal data, in special sections;

- provision of separate storage of personal data and their material carriers, which are processed for different purposes and which contain different categories of personal data;

- imposing a ban on transfer of personal data through open communication channels, computer networks outside the controlled area and the Internet without applying measures to ensure the security of personal data (except publicly available and / or depersonalized personal data) established in the UAE;

- storage of personal data material carriers in compliance with conditions that ensure the safety of personal data and exclude unauthorized access;

- internal control over the compliance of processing of personal data with the UAE legislation, laws and regulations adopted in accordance with it, requirements for the protection of personal data, this Policy, local regulatory acts of Company;

- other measures stipulated by the UAE legislation in the field of personal data.

10.2. Measures to ensure the security of personal data when it is processed in personal data information systems are established in accordance with the industry requirements of the legislation of the UAE in the field of personal data.

11. Control of compliance with the legislation of the UAE and local regulatory acts of Company in the field of personal data, including requirements for protection of personal data

11.1. Monitoring of compliance by employees of Company with the UAE legislation and local regulatory acts of Company in the field of personal data, including requirements for the protection of personal data, is carried out to verify compliance of processing of personal data in Company with the UAE legislation and local regulatory acts of the Company in the field of personal data, including requirements for the

protection of personal data, as well as the adoption of measures aimed at preventing and detecting violations of the legislation of the UAE in the field of personal data, identifying possible channels of leakage and unauthorized access to personal data, eliminating the consequences of such violations.

11.2. Internal control over the compliance by Company employees with the legislation of the UAE and local regulatory acts of Company in the field of personal data, including requirements for the protection of personal data, is carried out by the person responsible for organizing the processing of personal data in Company.

11.3. Internal control over the compliance of processing of personal data with the UAE and regulations adopted in accordance with it, requirements for the protection of personal data, this Policy, local regulatory acts of Company is carried out by the Asset Protection and Corporate Security Department of the Rosatom International Network private institution.

11.4. Personal responsibility for compliance with the laws of the UAE and local regulatory acts of Company in the field of personal data in Company, as well as for ensuring the confidentiality and security of personal data in Company, rests with the head of the Company.

12. Normative references

1. UAE Labor Law;
2. Federal Penal Code of 1987.