

PERSONAL DATA PROCESSING POLICY

1. General provisions

- 1.1. This Personal Data Processing Policy (hereinafter - "Policy") is developed and applied by "Exhibition Companies Group "BIZON" Limited Liability Company, abbreviated name "ECG "BIZON" LLC, (hereinafter also - "Operator") in accordance with the Federal Law of 27.07.2006 N 152-FL "On Personal Data" (with amendments and additions), Federal Law of 13.03.2006 N 38-FL "On Advertising" (with amendments and additions), and other regulations in the field of personal data protection in force in the territory of the Russian Federation
- 1.2. Presented Policy is part of the general policy regarding personal data processing of "ECG "BIZON" LLC.
- 1.3. The Policy applies to all personal data that may be obtained from individuals by the Operator via arms-expo.ru website (hereinafter "Site"), by the completion of registration forms at events conducted by the Operator and which may be definitely correlated with a particular individual and his/her personal data. This Policy does not apply to relations:
 - arising in the processing of personal data of the Operator's employees, since such relations are regulated by a separate local act, which is also part of the general policy regarding the personal data processing of "ECG "BIZON" LLC;
 - to which Federal Law N 152-FL "On Personal Data" is not applicable (Clause 2, Article 1).
- 1.4. The Policy defines the behavior of the Operator with respect to processing of personal data collected for processing; sets procedure and conditions of personal data processing of individuals who have transferred their personal data for processing to the Operator (hereinafter also - "Subject of Personal Data", "Subject") with and without application of automation tools, establishes procedures aimed at preventing violations of the legislation of the Russian Federation and eliminating of the consequences of such violations related to the personal data processing.
- 1.5. The Policy is set to protect the rights and freedoms of Subjects of Personal Data in the processing of their personal data as well as to establish the liability of the Operator's officials who have access to personal data of Subjects of Personal Data for non-compliance with the requirements and regulations governing the processing of personal data.
- 1.6. The Operator processes the following personal data:
 - last name, first name;
 - phone number;
 - e-mail address;
- 1.7. Through the use of the Site services the Operator also processes other impersonal data which are automatically transmitted during the use of the Site via the software installed on the computer:
 - information about the browser being used (or any other program used to access the Site);
 - IP address;
 - cookie data.

The Operator ascertains that entities unrelated to the Operator will have no access to the data which may be used by the Operator, except for the cases clearly allowed by the laws of the Russian Federation and present Policy. Upon the receipt of personal data which is not specified in this section, such data shall be immediately destroyed.

1.8. The Operator processes personal data of the Subjects of Personal Data by maintaining databases by automated, mechanical, manual methods for the purposes of:

1.8.1. promotion of goods, works and services of the Operator on the market and notification about sales actions, events and marketing campaigns of the Operator (in case of expressed consent of the Subject of Personal Data).

1.8.2. for any other purposes, if corresponding actions of the Operator do not conflict with the current legislation and Operator's business activities and only if the consent of the Subject of Personal Data has been obtained for the specified processing.

1.8.3. data specified in clause 1.7. of the present Policy are processed for the purpose of carrying out Sites' analytics, tracking and understanding the principles of Site application by the visitors, improving the functioning of the Site, solving technical problems of the Site, developing new products, expanding services, detecting the popularity of events and determining the effectiveness of advertising campaigns; security and fraud prevention.

1.9. The Operator processes personal data by performing any act (operation) or a set of acts (operations), including the following::

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- correction (update, change);
- extraction;
- operation;
- transmission (distribution, granting access);
- depersonalization;
- blocking;
- deleting;
- destruction.

2. Collecting, operating and disclosing of personal data

2.1. The Operator collects and begins personal data processing of the Subject starting from the moment of his/her consent obtaining for such actions.

Personal data processing consent may be given by the Subject of Personal Data in any form that allows to confirm the fact of such consent obtaining, unless otherwise established by federal law: in writing, orally or in any other form permitted by the current legislation, including the performance of implicative actions by the Subject of Personal Data. If the Subject of Personal Data does not provide the consent for his/her personal data processing, such processing shall not be performed.

2.2. Personal data of Subjects of Personal Data are collected by the Operator by:

- personal transfer of personal data by the Subject while completing registration forms in writing on paper when registering at the Operator's events;
- personal transfer of personal data by the Subject by entering corresponding information into electronic forms on the arms-expo.ru website;
- any other ways which do not conflict with the legislation of the Russian Federation and the requirements of international legislation on personal data protection.

2.3. The consent for personal data processing shall be deemed to be obtained by the Operator if the Subject of Personal Data performed any action or a set of the following actions:

- completion of paper documents/forms for registering at the Operator's events;
- order making on the Operator's Site;
- marking the corresponding box of a website form providing the consent to personal data processing in the amount, for the purposes and in accordance with the procedure set in the explanatory text related to that box;

2.4. The consent is considered to be obtained in accordance with the established procedure and shall be valid until the Subject sends the relevant application on termination of personal data processing to the Operator.

2.5. The Subject of Personal Data may at any time withdraw his/her consent to the processing of personal data provided that such a procedure does not violate the requirements of the legislation of the Russian Federation.

In order to withdraw the consent to personal data processing, the Subject of Personal Data must send a corresponding written notification to the postal address: 129223, Russian Federation, Moscow, P.B. 10, or by e-mail: admin@b95.ru

In case of withdrawal by the Subject of Personal Data of consent of his/her personal data processing, the Operator shall stop processing the data or ensure termination of such processing (if processing is performed by another person acting on behalf of the Operator) and if the preservation of personal data is no longer required for the purposes of its processing, destroy personal data or ensure its destruction (if personal data is processed by another person acting on behalf of the Operator) within a time period not exceeding thirty (30) days from the date of the withdrawal notification receipt, unless otherwise is provided by a contract to which the Subject of Personal Data is a party, beneficiary or guarantor; other agreements between the Operator and the Subject of Personal Data or if the Operator is not entitled to perform personal data processing without the consent of the Subject of Personal Data on the grounds stipulated by Federal Law N 152-FL "On Personal Data" of 27.07.2006 or other federal laws.

3. Personal Data Processing Rules and Procedure

3.1. In order to achieve the objectives of the present Policy, only those employees of the Operator who are entrusted with such duty in accordance with their official (work) duties are allowed to process personal data. The Operator demands its employees to maintain confidentiality and ensure the security of personal data while processing.

3.2. In accordance with the Policy, the Operator may perform personal data processing independently as well as with the involvement of third parties engaged by the Operator to perform processing for the purposes specified in present Policy.

3.3. In case of the third party involvement in personal data processing, the amount of personal data transferred to a third party for processing and the number of processing methods used by that party shall be the minimum necessary to fulfill their duties to the Operator. With respect to the processing of personal data by a third party, the obligation of such party to observe the confidentiality of personal data and ensure the security of personal data during its processing is established.

The Operator stores personal information of the Subjects of Personal Data in accordance with the current legislation.

3.4. In relation to personal information of the Subject of Personal Data, confidentiality shall be maintained, except for the cases of voluntary provision by the Subject of information about himself/herself for shared data access to unlimited range of persons. In this case, the Subject of Personal Data agrees that a certain part of his/her personal information becomes publicly available.

4. Information on the implemented requirements for personal data protection

4.1. The Operator's personal data processing activities are inextricably linked with the Operator's protection of the confidentiality of received information.

4.2. The Operator demands other persons who gained access to personal data neither to disclose nor to distribute personal data to third parties without the consent of the Subject of Personal Data, unless otherwise provided by federal law.

4.3. All employees of the Operator shall ensure confidentiality of personal data as well as

other information set by the Operator, if it does not contradict current legislation of the Russian Federation.

4.4. In order to ensure the security of personal data during its processing, the Operator takes all necessary and sufficient legal, organizational and technical measures to protect personal data from unlawful or accidental access, destruction, correction, blocking, copying, provision, distribution and other hostile actions. The Operator guarantees that all implemented measures for organizational and technical protection of personal data are carried out legally, in accordance with the requirements of the legislation of the Russian Federation on personal data processing.

4.5. The Operator shall apply necessary and sufficient legal, organizational and technical measures to ensure the security of personal data, including:

- identification of personal data security threats during its processing in personal data information systems;
- application of organizational and technical measures to ensure the security of personal data during its processing in personal data information systems necessary to fulfill the requirements for personal data protection, the execution of which ensures the levels of personal data protection established by the Government of the Russian Federation;
- application of the procedure for assessment of conformity of information protection tools;
- evaluation of the effectiveness of the measures taken to ensure the security of personal data before launching personal data information system;
- accounting of personal data storage media;
- detection of unauthorized access to personal data and counteraction;
- restoration of modified or destroyed personal data as a result of unauthorized access;
- implementation of measures aimed at preventing unauthorized access to personal data and/or its transfer to persons without the right to access such information;
- timely detection of unauthorized access to personal data and counteraction;
- prevention of manipulations with technical means of automated personal data processing, resulting in malfunctioning of such data;
- establishing of access rules to personal data processed in the personal data information system as well as ensuring registration and accounting of all actions performed with personal data in the personal data information system;
- control over the measures taken to ensure the security of personal data and the level of security of personal data information systems.

Taking into account current personal data security threats and applicable information technologies, personal data security measures implemented by the Operator within the framework of personal data protection system include:

- identification and authentication of access subjects and access objects;
- access control of access subjects to access objects;
- software environment limitation;
- protection of technical information carriers on which personal data is stored and/or processed;
- security events logging;
- antivirus protection;
- intrusion detection (prevention);
- ensuring the information system and personal data integrity;
- protection of virtualization environment;
- hardware and software protection;
- protection of the information system, its equipment, communication and data transmission systems;
- identification and response to incidents (one event or a group of events) which may result in disruptions of the information system and/or creation of personal data security risks;
- configuration management of information system and personal data protection system.

4.6. In order to ensure the compliance of the level of personal data protection with the requirements of the Federal Law of 27.07.2006 N 152-FL "On Personal Data" and the Federal Law of 27.07.2006 N 149-FZ "On Information, Information Technologies and Information Protection," the Operator does not disclose information about specific

applied means/solutions and measures ensuring personal data information security.

- 4.7. The Operator shall not disclose the information received from the Subject of Personal Data. Provision of information to agents and third parties acting on the basis of the agreement with the Operator for fulfillment of obligations for the Subject of Personal Data shall not be considered as a violation of above mentioned rule. Provision of the information of the Subject of Personal Data shall not be considered as a disclosure if it goes in accordance with the reasonable and applicable requirements of the law.

5. Consent to receive advertising information on telecommunication networks

5.1. By leaving a mailing request/signing up for promotional information:

- during the participation registration in event(s) held by the Organizer, by filling in the corresponding paper document/form;

- on the Site (online), by the Subject of Personal Data ticking on the corresponding web page;

means the consent of the Subject of Personal Data to receive from the Operator and third parties engaged by the Operator, via telecommunication networks (via provided mobile phone number and e-mail address) information messages, including information of commercial advertising nature (advertising) specified in Clause 1.8.2. of the Policy.

5.2. By giving the consent specified in clause 5.1. of the present Policy, the Subject of Personal Data confirms that he/she acts on his/her own free will and in his/her own interest and guarantees that provided personal data are accurate and trustworthy.

6. Final clauses

6.1. The present Policy is approved by the order of the General Director/CEO of "ECG "BIZON" LLC and comes into force from the date of its signing.

6.1. The Policy may be amended and supplemented by the order of the General Director/CEO of "ECG "BIZON" LLC.

6.2. The current version of the Policy is publicly available online.