

1. General

Personal data processing policy (hereafter, Policy) is developed in order to fulfill the legal requirements in relation to processing and protection of personal data according to article 18.1, part 1, paragraph 2 of the Federal Law No.152-FZ dated 27.07.2006 "On personal data".

This policy defines the method and terms of processing personal data in JSC AVTOVAZ (hereafter, Operator) and is aiming to protect human and citizen rights and liberties in relation to personal data processing and to ensure safety of the personal data, namely all information that Operator might receive regarding the User when the latter fills out the feedback sheet on the Operator's Website (hereafter, Website) and consequently receives the CV.

Policy contains information that shall be disclosed according to article 14, part 1 of the Federal Law "On personal data" and shall be a public domain document.

1.1. Operator information

1.1.1. Operator operates on the following address: 445024, Samara region, Togliatti, Yuzhnoye shosse, 36.

1.1.2. Information database containing personal data of the citizens of the Russian Federation is located in the Russian Federation on the following address: 445024, Samara region, Togliatti, Yuzhnoye shosse, 36.

1.2. Information on personal data processing

1.2.1. Operator processes personal data on a legal and fair basis in order to realize legal functions, authority and obligations, realize rights and legal interests of the Operator, Operator's employees and third parties.

1.2.2. Operator receives personal data provided directly by the User.

1.3. Terms and definitions

Current Policy uses the following terms and definitions:

1.3.1. "Personal data" – any information directly or indirectly related to a particular private person (User).

1.3.2. "Personal data processing" – any activity (operation) or a combination of activities (operations) performed with the use of automated means or without such means on the personal data, including collections, recording, organization, accumulation, storage, clarification (update, editing), extraction, application, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

1.3.3. "Personal data confidentiality" – mandatory requirement for the Operator or other persons with access to the personal data not to allow its distributions without User's agreement or another legal basis.

1.3.4. "User" – person with access and ability to use Operator's website in the Internet.

1.3.5. "Cookie files" – text file with the data that is recorded in the browser by the server of the Operator website visited by the user. Cookie files contain information which may be useful for the Operator website or another website to interact with the User and to customize their experience, to identify the User's browser, and in general to ensure continuous work of the Operator's website and its functions.

1.4. Information regarding website rules

1.4.1. User's operation of the Operator's website and provision of personal data to the Operator implies complete agreement with this Policy and conditions of User's personal data processing.

1.4.2. In case of disagreement with the Policy conditions, the User should stop operating the website.

Operator collects, applies and protects personal data provided to the Operator by the User when the latter operates the Operator's website (hereafter, Website) from any device or communicates with the Operator in any form according to this Policy.

1.4.3. Operator does not investigate accuracy of the personal data provided by the User to the Website.

2. General

2.1. Policy objective

2.1.1. This Policy defines Operator's obligations in terms of not disclosing and protecting the confidentiality of the personal data.

2.1.2. Personal data in processing as per the Policy are provided by the User via filling out feedback sheets in the program module:

2.1.2.1. User last name, first name, patronymic (including separately and when they change);

2.1.2.2. User contact phone number;

2.1.2.3. User e-mail;

2.1.2.4. IP-address, cookie files;

2.1.2.5. as well as any information related to the User's person which the User decides to record on the Website, including but not limited to: identification document or other User document particulars, citizenship, date of birth, place of birth, registration address, real place of residence address, link to the personal website and social media profiles, information regarding profession, work place, position, education and income and other personal data.

2.1.3. Personal data entered by the User in the feedback sheet is automatically transferred to the Operator

2.1.4. Any other personal data not listed above shall be stored and not distributed, except for the cases defined by the current laws of the Russian Federation.

2.2. Personal data processing principles

Operator processing of personal data is done according to the following principles:

2.2.1. Legal and fair basis;

2.2.2. personal data processing is limited to achieving particular, previously defined objectives according to law;

2.2.3. personal data processing not related to the objectives of personal data collecting is not allowed;

2.2.4. combining of databases containing personal data the processing of which is performed for unrelated objectives is not allowed;

2.2.5. only personal data pertaining to the processing objective may be processed;

2.2.6. content and volume of the personal data being processed correlates to the defined objectives;

2.2.7. personal data processing deemed excessive to the defined objectives is not allowed;

2.2.8. precision, adequacy and relevancy of the personal data in relation to the processing objectives are ensured;

2.2.9. destruction or depersonalization of personal data upon achieving the processing objective or in case of these objectives being no longer necessary is ensured if the Operator is unable to remove the faulty personal data or if other methods are not defined by the federal laws.

2.3. Personal data processing conditions

Operator processes personal data if at least one of the following conditions is satisfied:

2.3.1. personal data is processed after the User agrees to have their personal data processed;

2.3.2. personal data processing is necessary to achieve the objectives related to realization of the functions, authorities and obligations born by the Operator according to the laws of the Russian Federation;

2.3.3. personal data processing is necessary to execute the contract, one of the parties of which is the User and which has been signed on the User's initiative;

2.3.4. personal data processing is necessary to realize rights and legal interests of the Operator and third parties to achieve common major objectives on the condition that User's rights and liberties are not violated;

2.3.5. personal data processed is accessible to an unlimited group of people with access provided by the User or by the User's request (hereafter, general access personal data);

2.3.6. personal data processed must be published or disclosed according to the federal law.

2.4. Purpose of collecting personal data

User's personal data may be used by the Operator for the following purposes:

- 2.4.1. CV consideration for the purpose of studying the possibility of employment;
- 2.4.2. consideration of the test-drive participation application;
- 2.4.3. establishment of communication with the User, including sending notifications, requests, providing services, processing User's requests and applications.
- 2.4.4. ensuring the User receives quality customer and technical support in case they face issues when using the Website.

2.5. Means and timing of personal data processing

- 2.5.1. User's personal data processing does not have any time constraints and may be done via any legal means, including via the personal data informational systems with or without automation.
- 2.5.2. User agrees that the Operator has the right to transfer personal data to the third parties authorized by JSC AVTOVAZ to process personal data following a contract. The list of the authorized third parties can be found here: <https://www.lada.ru/en/personal-data>.
- 2.5.3. User's personal data may be transferred to the authorized offices of the government of the Russian Federation only following the reasoning and procedure defined by the laws of the Russian Federation.
- 2.5.4. Operator takes the necessary organizational and technical measures to protect User's personal data from unauthorized and accidental access, destruction, altering, blocking, copying, distribution and other unauthorized actions by the third parties.
- 2.5.5. The agreement may be voided by the User via sending a written application with the data defined in the article 14 of the Law "On personal data" to the Operator.

2.6. Personal data confidentiality

- 2.6.1. Operator uses the information received from the User only for the purposes described in paragraph 2.4 of this Policy.
- 2.6.2. Operator ensures the secrecy of the confidential information, does not disclose it without a written consent from the User and does not sell, exchange, publish or disclose User's personal data in other ways, with the exception of cases defined in the laws of the Russian Federation.
- 2.6.3. Operator has to take precautions to protect the confidentiality of the User's personal data according to the procedure usually applied to protect such information in the existing document flow.
- 2.6.4. Operator has to ensure the blocking of personal data related to the specific User from the moment the User, their authorized representative or an authorized office for protecting User rights sends in a request or application for inspection in case inaccurate personal data or unauthorized actions have been detected.

2.7. Biometric personal data

- 2.7.1. Data characterizing physiological and biological traits of the person which would allow to identify them – biometric personal data – may only be processed by the Operator after receiving written consent from the User.

2.8. Cookies

- 2.8.1. Cookies are used to analyze usage data and information interesting to the User, in particular, they store user identification information when logging into the profile and vehicle configurations selected by the User.
- 2.8.2. To store and play videos the Operator's website uses external video hosting service YouTube embedded on the website's page. Cookies are used by the service to keep track of the settings of the embedded YouTube video when it is played.
- 2.8.3. The map search function on the website is provided by the external cartography service Yandex.Maps embedded on the website's page. Yandex may collect the following types of User personal data when they use the Operator's website or its services:

- Geolocation data;
- Electronic data (HTTP headers, IP address, cookie files, web beacons and pixel tags, browser identification data, hardware and software information);
- time and date of accessing the Operator's website or its services.

Yandex also uses cookies and web beacons (including pixel tags) to collect personal data and connect this data with the User's device and browser.

2.8.4. To detect user preferences and popular pages of the Operator's website, the website uses web analytics services Yandex.Metrics and Google Analytics. This allows the Operator to purposefully compose the pages according to the User's interests and requests, thus increasing the content quality.

Yandex processes the collected data to evaluate User's navigation of the website, to prepare website performance reports for the Operator and for other services. Yandex processes data according to the procedure defined in the Yandex.Metrics terms of use.

Google Analytics allows us to collect and analyze data on how the Users interact with the Operator's website. Its collection also makes use of the cookie files.

2.8.4. Operator's website uses online marketing services (Yandex.Metrics, Google, Facebook, VKontakte, AdRiver) that use retargeting technology. Cookie files store information on the products and services interesting to the User, which is then used to inform the User in relation to their interests.

Google cookie files make the advertisement more attractive for the Users and more effective for the advertisers (by making the ad more relevant, preparing better reports, increasing campaign efficiency, avoiding repeated showing of the same ads to the Users, etc.).

Operator's website uses the Facebook pixel, which allows to evaluate the efficiency of ads and study actions of the website users. Cookie files allow to show ads to the Users who have previously visited the Operator's website and suggest products and services based on those actions.

Operator's website uses the VKontakte (VK.com) pixel which shows ads to the visitors of VKontakte who have previously visited the Operator's website.

AdRiver system collects data which determines the user's unique ID tag if the user remains anonymous. This data includes:

- user's IP-address geographic tag;
- user's operating system and browser;
- amount of views/clicks of the ad;
- amount of visits to the web resources and page URLs.

3. User rights

3.1. By making the decision to provide their personal data, the User acts of their own free will and in their own interests, thus expressing their consent.

3.2. The User has the right to obtain information from the Operator pertaining to the personal data processing, unless this right is restricted according to the laws of the Russian Federation. The User has the right to demand clarification of their personal data by the Operator, or their blocking or destruction in case if this data is incomplete, obsolete, inaccurate, has been obtained illegally and is not necessary for the defined processing objective, as well as the right to take legal measures to protect their rights.

4. Personal data security

4.1. Security of personal data processed by the Operator is ensured via implementation of legal, organizational and technical measures necessary to ensure the satisfaction of the federal laws in relation to personal data security.

4.2. To prevent unauthorized access to personal data, the Operator implements the following organizational and technical measures:

- 1) appointment of officers responsible for personal data collection;
- 2) restriction of the number of personnel with access to personal data; issuing of internal regulations in relation to personal data security and processing, as well as procedures to

- detect and prevent violations of the laws of the Russian Federation and the eradication of consequences of such violations;
- 3) briefing the persons responsible for personal data processing on the requirements of the federal laws and internal regulations in relation to personal data processing; organization of accounting, storage and distribution of data storage devices;
 - 4) unrestricted access of users to the informational resources and software and hardware used in information processing;
 - 5) registration and accounting for the personal data system users' actions; application of antivirus software and personal data security system restoration software;
 - 6) organization of restricted access to the personal data processing areas on the Operator's site.

4.3. Operator bears no responsibility in case of loss or disclosure of the User's personal data in the following cases:

- 4.3.1. if the data entered public domain before it was lost or disclosed by the Operator;
- 4.3.2. if the data has been received by the Operator from a third party before it was provided to the Operator by the User;
- 4.3.3. if the data has been disclosed following the User's consent.

5. Disputes

- 5.1. Before bringing the dispute regarding relationships between the Website User and Operator to the court of law, a claim is necessary (written proposal to settle the dispute in good faith).
- 5.2. The party receiving the claim has to inform the claimant about the results of the claim's study within 30 (thirty) calendar days from the moment of receiving the claim.
- 5.3. If an agreement has not been reached, the claim shall be brought before the Arbitrary Court of the Samara region.
- 5.4. Current Policy and the relations between User and Operator are subject to the current laws of the Russian Federation.

6. Additional terms

- 6.1. All questions related to personal data processing not discussed in this Policy are resolved according to the current laws of the Russian Federation in relation to personal data processing.
- 6.2. Operator has the right to change this Policy without User's approval.
- 6.3. New version of the Policy becomes effective from the moment of its publishing on the Website.

Russian Federation, city of Togliatti