



APPENDIX NO. 1

APPROVED

By Order of the Chief Executive Officer of
JSC Ilim Group of
September 30, 2020 No. GD-
0462/20

POLICY
of JSC Ilim Group
on processing and protection of personal data

St. Petersburg,
2020

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1 Purpose of the policy and general provisions

- 1.1 The Policy of JSC Ilim Group on processing and protection of personal data (hereinafter, the Policy) establishes the main principles and conditions, list of actions and methods for processing of personal data, and functions of JSC Ilim Group during personal data processing, rules for employees of JSC Ilim Group (hereinafter, the Company) during processing of personal data, rights of personal data subjects, and principles for personal data protection.
- 1.2 This Policy is publicly available on the Company's website.
- 1.3 This Policy applies to all personal data processed by the Company.
- 1.4 This Policy may be amended or supplemented by Order of the Company's Chief Executive Officer.

2 Scope

- 2.1 This Policy shall apply to all organizational units, Branches, Representative Offices, and remote structural units of the Company.
- 2.2 This Policy is recommended for adoption by subsidiaries of JSC Ilim Group.
This Policy shall apply to the subsidiaries once approved by the management bodies of the subsidiaries as an internal company document.
- 2.3. All employees of the Company shall be responsible for due compliance with this Policy to the extent of their functional responsibilities.

3 Laws and other regulations of the Russian Federation for determination of the policy on personal data processing in JSC Ilim Group

- 3.1. This Policy was developed in accordance with the requirements of the laws and other regulations of the Russian Federation:
 - the Constitution of the Russian Federation.
 - the Labor Code of the Russian Federation;
 - Federal Law No. 152-FZ of July 27, 2006 "On Personal Data", as amended;
 - Resolution of the Government of the Russian Federation no. 1119 of November 01, 2012 "On approval of the requirements for protection of personal data during its processing in the personal data information systems";
 - Resolution of the Government of the Russian Federation No. 687 of September 15, 2008 "On approval of the Regulations on specific features of personal data processing performed without means of automation";
 - Resolution of the Government of the Russian Federation No. 512 of July 06, 2008 "On approval of the requirements for biometric data physical media and technologies for storage of such data outside the personal data information systems";

- Other laws of the Russian Federation and regulations of the authorized government authorities.
- 3.2. In order to implement the provisions of the Policy, JSC Ilim Group develops relevant internal regulations and other documents, including:
- The Regulations on Protection of the Rights of Personal Data Subjects in JSC Ilim Group;
 - The Regulations on Ensuring Security of Personal Data During its Processing in the Personal Data Information Systems of JSC Ilim Group.
 - the list of positions in the structural units of JSC Ilim Group requiring personal data processing in case of replacement;
 - The Regulations for processing of personal data of the structural units of JSC Ilim Group, its branches, ROPs, and representative offices;
- other internal regulations and documents regulating matters pertaining to personal data processing in JSC Ilim Group.

4 Terms and definitions

- 4.1. **The Company** - JSC Ilim Group, including the Head Office (HO), Remote Structural Units (ROPs), Representative Offices and Branches.
- 4.2. **Data Operator** — JSC Ilim Group acting severally or jointly with other persons, arranging, and/or carrying out the processing of personal data, as well as defining the purpose of personal data processing, composition of personal data for processing and actions (operations) to be performed with personal data.
- 4.3. **Personal Data** — any information relating to a directly or indirectly identified or identifiable natural person (personal data subject).
- 4.4. **Personal Data Processing** — any action (operation) or an aggregate of actions (operations) performed with or without the use of automation software upon personal data, including collection, recording, systematization, accumulation, storage, clarification (update, adjustment), retrieval, usage, transmission (propagation, submission, access), including cross-border transmission, depersonalization, blocking, removal, and destruction of personal data.
- 4.5. **Personal Data Provision** — any action aimed at personal data disclosure to a particular person or to a particular group of persons.
- 4.6. **Personal Data Dissemination** — any action aimed at personal data disclosure to general public.
- 4.7. **Cross-border transmission of personal data** — transmission of personal data to the territory of a foreign country to the authority of a foreign country, foreign person, or foreign entity.
- 4.8. **Blocking of personal data** — temporary suspension of personal data processing (except for cases when processing is required for personal data validation).
- 4.9. **Personal Data Destruction** — any action that results in failure to recover personal data in the personal data information system or in destruction of the physical media on which personal data is stored.

- 4.10. **Data Depersonalization** — any action resulting in impossibility to define whether the personal data relates to the specific data subject without using the additional information.
- 4.11. **Personal data information system** — an aggregate of personal data contained in data bases and information technologies and technical means to ensure its processing.
- 4.12. **Automated processing of personal data** - processing of personal data using computer equipment.
- 4.13 **Personal data subject** - a natural person which is directly or indirectly determined or to be determined using personal data.

5 List of subjects whose personal data is processed in JSC Ilim Group

JSC Ilim Group processes the following categories of personal data subjects:

- 5.1. Personal data subjects having employment relations with the Company, being employees of the structural units of the Head Office, ROPs, branches and representative offices;
- 5.2. Personal data subjects which are not employees of the Company, including:
- candidates to be employed by JSC Ilim Group;
 - employees of the controlled companies, as part of fulfillment of Ilim Group's responsibilities under the contracts involving delegation of authority of the sole executive body to the management company - JSC Ilim Group;
 - Company contractors - natural persons;
 - other personal data subjects (to ensure achievement of processing goals stated in section 6 of the Policy)

6 Principles and goals of personal data processing

- 6.1. Processing of personal data in JSC Ilim Group is performed considering the need to ensure protection of rights and freedoms of Company employees and other personal data subjects, including protection of personal and family privacy, based on the following principles:
- 6.1.1. Personal data processing in JSC Ilim Group is performed lawfully and fairly;
- 6.1.2. Processing of personal data is limited to achievement of specific, explicitly stated and legitimate purposes;
- 6.1.3. Personal data may not be processed for any purpose that is incompatible with that for which the information is collected;
- 6.1.4. Only personal data meeting the purpose of processing shall be processed;

- 6.1.5. Personal data that is processed is adequate and relevant in relation to the declared purposes of the processing. The declared purpose of personal data processing shall not be exceeded;
- 6.1.6. Personal data processing shall be accurate, sufficient and relevant with respect to the purpose of personal data processing;
- 6.1.7. There shall be no integration of data bases containing personal data which was processed for the conflicting purposes;
- 6.1.8. The Company takes all necessary actions or ensures taking of such actions to delete or update insufficient or inaccurate personal data;
- 6.1.9. Processed personal data shall be deleted or depersonalized after reaching the purpose of processing, or in case the need to reach such purposes is lost, unless otherwise provided for in the federal law;
- 6.1.10. Storage of personal data shall be performed in a manner allowing to determine a personal data subject, but no longer than it is required for processing of personal data, unless the period for storage of personal data is provided for in any law, contract where a party, beneficiary, or a surety is a personal data subject;

6.2. Personal data is processed in JSC Ilim Group in order to:

- 6.2.1. ensure compliance with the Constitution of the Russian Federation, laws and other regulations of the Russian Federation, internal regulations of the Company;
- 6.2.2. perform functions, authority and responsibilities vested by the laws of the Russian Federation in JSC Ilim Group, including those to submit personal data to the government authorities, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Compulsory Medical Insurance Fund, and other bodies;
- 6.2.3. regulate employment relations with employees of JSC Ilim Group (including employment, training and promotion), ensure personal safety, protection of life, health and other vital interests of personal data subjects;
- 6.2.4. prepare, sign, implement and terminate contracts/agreements with contractors;
- 6.2.5. ensure site access and internal security control at the facilities of JSC Ilim Group;
- 6.2.6. make reference materials to provide internal information support to the operations of the Company, its branches and representative offices, subsidiaries and organizations of JSC Ilim Group;
- 6.2.7. exercise rights and lawful interests of JSC Ilim Group in the course of activities prescribed by the Articles of Association and other internal regulations of JSC Ilim Group or third parties, or to achieve socially significant goals;

- 6.2.8. enforce court rulings, deeds of other bodies or executives, to be enforced in accordance with the laws of the Russian Federation on enforcement proceedings.
- 6.2.9. accomplish other lawful purposes.

7. Functions and rights of JSC Ilim Group during processing of personal data.

7.1. The Company takes necessary and sufficient actions to ensure compliance with the requirements of Russian laws and internal regulations of JSC Ilim Group on personal data, including, but not limited to:

- Takes legal, organizational, technical measures to protect personal data from unlawful or accidental access thereto, destruction, amendment, blocking, copying, provision, distribution of personal data, and from other unlawful actions with respect to personal data;
- Publishes internal regulations which define the policy and matters concerning processing and protection of personal data in JSC Ilim Group, ensures communication of the laws of the Russian Federation and internal regulations of the Company on personal data to the Company employees, and their training;
- Appoints persons responsible for processing of personal data in JSC Ilim Group;
- Discontinues processing and destroys personal data in cases stipulated by the laws of the Russian Federation on personal data;
- Obtains consents of the personal data subjects to process personal data, except for cases expressly provided for in the current laws;
- Performs other actions stipulated by the laws of the Russian Federation on personal data;

7.2. As a Data Operator, JSC Ilim Group shall be entitled to:

- independently define the scope and list of actions necessary and sufficient to ensure fulfillment of responsibilities stipulated by the Law on Personal Data and related regulations, unless otherwise provided for in the Law on Personal Data or other federal laws;
- delegate processing of personal data to another person upon consent of the personal data subject, unless otherwise provided for in the federal law, based on the relevant contract to be entered into with such person;
- in case of withdrawal of a consent for processing of personal data by the personal data subject, the Data Operator shall be entitled to continue processing of personal data without consent of the personal data subject on the basis of the grounds specified in the Federal Law “On Personal Data”.

8. Conditions for personal data processing in JSC Ilim Group

Processing of personal data is allowed only in the following cases:

- 8.1. Processing of personal data is performed upon consent of the personal data subjects to process their personal data, unless otherwise provided for in the legislation.
- 8.2. The Company shall not disclose or distribute personal data to any third parties, unless otherwise provided for in the legislation.
- 8.3. In case processing of personal data is delegated to another person upon consent of the personal data subject on the basis of the contract entered into with such person, such contract shall contain a list of actions (operations) with personal data, processing goals, responsibility of such person to keep personal data confidential, and ensure security of personal data during processing, and requirements to protection of personal data in accordance with article 19 of the Federal Law “On Personal Data”.
- 8.4. For the purpose of internal information support, the Company may prepare internal reference materials (including, but not limited to, the Company’s address directory and organization) to include personal data upon written consent of the subject/owner of personal data, unless otherwise stipulated by the Russian laws. Reference materials may include full name, place of work, position, year and place of birth, address, subscriber number, e-mail, photo, other personal data to be provided by the personal data subject.
- 8.5. Access to personal data to be processed in the Company is provided by CEO’s Order with respect to the persons holding positions included in the list of positions of the structural units of the Company, its branches and representative offices, whose personal data is processed in case of replacement.

9. List of actions to be performed with personal data and methods of its processing

All personal data of the employees is to be provided directly by the personal data subjects.

- 9.1 The Company may take the following actions during processing of personal data: collection, recording, systematization, accumulation, storage, clarification (update, amendment), retrieval, usage, transmission (propagation, submission, access), including cross-border transmission, depersonalization, blocking, removal, and destruction of personal data.
- 9.2. Processing of personal data in JSC Ilim Group is performed using the following methods:
 - non-automated processing of personal data;
 - automated processing of personal data and transmission of the information received via information and telecommunication networks or without them;
 - combined method for processing of personal data;

10. Rights of personal data subjects

- 10.1. The personal data subject is entitled to:

- 1) receive information concerning processing of its personal data, except for cases provided for in the federal laws. Information is provided to the personal data subject by the Data Operator in an accessible format, it shall not contain personal data of other personal data subjects, except for cases when there are legal grounds for disclosure of such personal data. The list of information and procedure for its receipt is established by legislation.
- 2) request the Data Operator to clarify the personal data, block it or destroy if such personal data is not complete, outdated, inaccurate, unlawfully received, or is not required for the declared processing purpose, and take all lawful actions to protect the rights;
- 3) refer to the Data Operator to adjust, withdraw, fully or partially, block or destroy personal data, and file complaints or proposals to HR_communication@ilimgroup.ru;
- 4) appeal in Roskomnadzor or in court unlawful actions or omission to act by the Data Operator during processing of personal data.

11. Measures to ensure fulfillment of the operator's responsibilities while processing the personal data taken by JSC Ilim Group

In order to ensure fulfillment of responsibilities of the Data Operator, the Company takes the following necessary and sufficient actions provided for by the applicable laws:

- 11.1. Obtains consents of the personal data subjects to process personal data, except for cases expressly provided for in the current laws of the Russian Federation;
- 11.2. Separates personal data processed without automation from other information, in particular, by storing it on separate physical media, in special sections, ensuring separate storage of personal data and its physical media in compliance with the conditions ensuring integrity of personal data to exclude unauthorized access thereto;
- 11.3. Performs internal control of personal data processing to comply with the Federal Law “On Personal Data” and related regulations, requirements to protection of personal data, this Policy, internal regulations of the Company;
- 11.4. Arranges training and methodological work with employees of Company structural units, its branches and representative offices, holding positions included in the list of positions of the structural units whose personal data is processed in case of replacement;
- 11.5. Bans transmission of personal data without taking measures to ensure security of personal data (except for publicly available and/or depersonalized personal data) established in the Company;
- 11.6. Performs other actions stipulated by the laws of the Russian Federation on personal data.

12. Control over compliance with the laws of the Russian Federation and internal regulations of JSC Ilim Group on personal data, including the requirements for personal data protection

data by its structural units, branches and representative offices, including actions taken to prevent failure to comply with the requirements of current laws, identification of possible leak channels of and unauthorized access to personal data, elimination of consequences of failure to comply with the requirements in order to check compliance of personal data processing in the structural units with the Russian laws and regulations of the Company by persons responsible for processing of personal data of the Company together with the Information Security Department.

- 12.2. Control over compliance with the laws of the Russian Federation and internal regulations of JSC Ilim Group on personal data by structural units of the Company, its branches and representative offices, including the requirements for protection of personal data, shall be performed by a person responsible for processing of the Company's personal data.
- 12.3. Personal responsibility for compliance with the laws of the Russian Federation and internal regulations of the Company on personal data by structural units of the Company, its branches and representative offices, as well as for ensuring confidentiality and security of personal data in the said units of JSC Ilim Group, shall be held by the heads of those units.