

CROCUS INTERNATIONAL Joint Stock Company
(abridged name JSC CROCUS),
Krasnogorsk Branch “Crocus Expo”
PERSONAL DATA PROCESSING POLICY

1. General Provisions

- 1.1. This Policy regarding the processing of personal data (hereinafter referred to as the "Policy") is developed and applied by Krasnogorsk Branch “Crocus Expo” of CROCUS INTERNATIONAL Joint Stock Company (short title JSC CROCUS, PSRN 1027700257023, location; 18, ul. Mezhdunarodnaya, city of Krasnogorsk, Krasnogorsk district, Moscow region, Russian Federation) in accordance with the Federal Law as of July 27, 2006 No. 152-FZ "On Personal Data" (as amended and supplemented), the Federal Law No. 38-FZ as of March 13, 2006 "On Advertising" (as amended and supplemented) and other regulatory enactments in the field of personal data protection, in force within the Russian Federation.
- 1.2. This Policy is part of the General Policy of JSC CROCUS in relation to the processing of personal data.
- 1.3. This Policy shall apply to all personal data that can be received from individuals by the Operator during their registration as visitors or participants of exhibitions and other events held at the Crocus Expo International Exhibition Center, organized by JSC CROCUS, through the official website of the exhibition (hereinafter referred to as the "Site"), through the Service Center of the Operator (hereinafter referred to as the "Service Center"), and which can be unambiguously correlated with a specific individual and his personal data.

The effect of this Policy shall not apply to the relations:

- arising from the processing of personal data of the Operator’s employees, since such relations are regulated by a separate local act that is also part of the General Policy on the processing of personal data of JSC CROCUS:
- to which the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data" does not apply (paragraph 2 of Article 1).

1.4. The Policy shall determine the Operator’s behavior in relation to the processing of personal data received for processing; the procedure and conditions for processing personal data of individuals who submitted their personal data for processing to the Operator (hereinafter also referred to as the "Personal Data Subject", "Subject") with and without the use of automation facilities; establish procedures aimed at preventing violations of the legislation of the Russian Federation and eliminating the consequences of such violations related to the processing of personal data.

1.5. The Policy is designed to ensure the protection of the rights and freedoms of the Subjects in the processing of their personal data, as well as to establish the responsibility of the Operator's officials who have access to the personal data of the Subjects for failure to comply with the requirements and rules governing the processing of personal data.

1.6. The Operator shall carry out the processing of the following personal data:

- surname, name;
- phone number;
- email address;
- tickets delivery address;

- data on the services rendered and provided to the Personal Data Subject, including the history of the Subject's orders;
- history of appeals of the Personal Data Subject, including the documents sent by the Subject in the course of appeals to the Operator.

1.7. When using the services of the Site, the Operator shall also process other impersonal data that is automatically transmitted during the use of the Site through the software installed on the computer:

- details about the browser (or other program used to access the site);
- IP address;
- data of cookie files.

The Operator guarantees that the organizations external to the Operator shall not have access to such data that may be used by the Operator, except in cases expressly stipulated by the current legislation of the Russian Federation and paragraph 3.2 of this Policy. When receiving personal data not listed in this section, such data shall be subject to immediate destruction.

1.8. The Operator shall carry out the processing of the personal data of the Subjects by maintaining databases in an automated, mechanical, manual way in order to:

1.8.1. process applications, requests or other actions of the Subject connected with his registration as a visitor or exhibitor or other event, including for notification of cancellation, replacement or postponement of an event; sending of information messages relating to the event to which the Subject has registered as such, etc.;

1.8.2. in the case of the expressed consent of the Subject - in order to promote the goods, works and services of the Operator on the market, to notify about the ongoing exhibitions and other events, promotions, discounts, marketing campaigns of the Operator;

1.8.3. for other purposes in the event that the relevant actions of the Operator do not contradict the current legislation, the Operator's activities, and the consent of the Personal Data Subject has been obtained for carrying out the said processing;

1.8.4. the data specified in clause 1.7 of this Policy shall be processed for the purpose of implementing Site analytics, tracking and understanding the principles of using the Site by visitors, improving the functioning of the Site, solving technical problems of the Site, developing new products, expanding services, identifying the popularity of exhibitions and other events and determining the effectiveness of advertising campaigns; ensuring security and preventing fraud, providing effective customer support (display of the nearest offices, concerts, etc.).

1.9. The Operator shall perform processing of personal data by performing any action (operation) or set of actions (operations), including the following:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- modification (update, revise);
- retrieval;
- use;
- transfer (distribution, provision, access);
- depersonalization;
- blocking;
- deletion;
- destruction.

2.

Receipt, Use and Disclosure of Personal Data

2.1. The Operator shall receive and begin processing the personal data of the Subject from the moment of obtaining his consent.

Consent to the processing of personal data may be given by the Subject in any form that allows to confirm the fact of obtaining consent, unless otherwise established by federal law: in written, oral or other form provided for by the current legislation, including through the performance of conclusive acts by the Subject. In the absence of the consent of the Subject to the processing of his personal data, such processing shall not be carried out.

2.2. The personal data of the Subjects shall be obtained by the Operator:

- by personal transfer of personal data by the Subject when entering information into the accounting forms in electronic form on the Operator's Site;
- by personal transfer of personal data by the Subject when contacting the Service Center and communicating them verbally by phone during execution of his registration as a visitor or exhibitor or other event;

- in other ways, not inconsistent with the legislation of the Russian Federation and the requirements of international legislation on the protection of personal data.

2.3. Consent to the processing of personal data shall be deemed to have been granted by the performance by the Subject of any action or combination of the following actions:

- filling out the document in hard copy at the Operator's Service Center;
- registration on the Operator's Website;
- affixing the corresponding form on the Site of a note of consent to the processing of personal data to the extent for the purposes and in the manner provided for in the text proposed before obtaining consent for inspection;
- communication of personal data orally when contacting the Service Center by phone during the registration process as a visitor or exhibitor or other event.

2.4. The consent shall be deemed to have been received in accordance with the established procedure and is valid until the date of submission by the Subject of the relevant application for the termination of the processing of personal data at the Operator's location.

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

To revoke consent to the processing of personal data, the Subject shall send a written notification to the mailing address: 16, ul. Mezhdunarodnaya, city of Krasnogorsk, Krasnogorsk district, Moscow region, Russian Federation, 143401.

In the event the Subject withdraws his consent to the processing of his personal data, the Operator shall stop processing the same or ensure the termination of such processing (if processing is performed by another person acting on behalf of the Operator) and in the event that the retention of personal data is no longer required for the purpose of processing the same, destroy personal data or ensure destruction thereof (if the processing of personal data is carried out by another person acting on behalf of the Operator) within a period not exceeding 30 (thirty) days from the date of the said feedback, unless otherwise provided by a contract to which the beneficiary or guarantor is the said subject, by another agreement between the Operator and the Subject, or if the Operator is not entitled to process personal data without the consent of the Subject on the grounds provided for by Federal Law No. 152-FZ as of July 27 "On Personal Data" or other federal laws.

3.

Rules and Procedures for Processing Personal Data

- 3.1. In order to achieve the objectives of this Policy, only those employees of the Operator who are entrusted with such duty in accordance with their official (labor) duties shall be allowed to process personal data. The Operator requires its employees to maintain confidentiality and ensure the safety of personal data when processing the same.
- 3.2. In accordance with this Policy, the Operator can process personal data independently, as well as with the involvement of third parties, that are involved by the Operator and carry out processing for the fulfillment of the purposes specified in this Policy.
- 3.3. In the case of ordering the processing of personal data to a third party, the amount of personal data transferred to a third party and the number of processing methods used by that person should be minimally necessary to fulfill its duties to the Operator. With regard to the processing of personal data by a third party, it is the duty of such a person to respect the confidentiality of personal data and to ensure the safety of personal data when processing the same.
- 3.4. When providing services for the implementation of internal activities, the Operator shall use both automated processing of personal data (using computer facilities) and manual (using paperwork).

The Operator shall not take decisions that give rise to legal consequences with respect to the Personal Data Subject or otherwise affecting his rights and legitimate interests, based solely on the automated processing of personal data.

- 3.5. In respect of the personal data of the Subject, confidentiality shall remain, except for cases of voluntary provision by the Subject of information about himself for general access to an unlimited number of persons. In this case, the Subject agrees that a certain part of his personal information shall become publicly available.

4. Information on the Current Requirements for the Protection of Personal Data

- 4.1. The Operator's activity in the processing of personal data is inextricably linked with the protection of confidentiality of the information received by the Operator.
- 4.2. The Operator claims other persons that obtained access to personal data not to disclose to third parties and do not distribute personal data without the consent of the Personal Data Subject, unless otherwise provided by federal law.
- 4.3. All the Operator's employees shall ensure the confidentiality of personal data, as well as other information set by the Operator, if this does not contradict the current legislation of the Russian Federation.
- 4.4. In order to ensure the security of personal data during processing, the Operator shall take necessary and sufficient legal, organizational and technical measures to protect personal data from unauthorized or accidental access thereto, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation thereto. The Operator shall ensure that all measures implemented for the organizational and technical protection of personal data are carried out on legal grounds, including in accordance with the requirements of the legislation of the Russian Federation on the processing of personal data.
- 4.5. The Operator shall apply the necessary and sufficient legal, organizational and technical measures to ensure the security of personal data, including:
 - identification of threats to the security of personal data when processing the same in the personal data information systems;

- use of organizational and technical measures to ensure the safety of personal data when processing them in the personal data information systems required to meet the requirements for the protection of personal data, the fulfillment of which is ensured by the levels of protection of personal data established by the Government of the Russian Federation;
- use of procedure that passed in accordance with the established procedure for assessing the compliance of information protection means;
- evaluation of the effectiveness of measures taken to ensure the security of personal data prior to commissioning of the personal data information system;
- accounting of medium facility of personal data;
- detection of unauthorized access to personal data and taking measures;
- restoration of personal data, modified or destroyed due to unauthorized access thereto;
- carrying out activities aimed at preventing unauthorized access to personal data, and (or) transferring them to persons that do not have the right to access such information;
- timely detection of unauthorized access to personal data and taking necessary measures;
- preventing the impact on technical means of automated processing of personal data, as a result of which their functioning may be violated;
- establishing rules for access to personal data processed in the personal data information system, as well as ensuring registration and recording of all actions performed with personal data in the personal data information system;
- control over the measures being taken to ensure the security of personal data and the level of security of personal data information systems.

The measures to ensure the security of personal data to be implemented by the Operator within the framework of the personal data protection system, bearing in mind the current threats to the security of personal data and applied information technologies, shall comprise:

- identification and authentication of access entities and access objects;
- management of access subjects to access objects;
- limitation of software environment;
- protection of computer storage media on which personal data is stored and (or) processed;
- registration of security events;
- anti-virus protection;
- detection (prevention) of intrusions;
- ensuring the integrity of the information system and personal data;
- protection of virtualization environment;
- protection of technical means;
- protection of the information system, its facilities, communication and data transmission systems;
- detection of incidents (one event or group of events) that may lead to malfunctions or disruption of the information system operation and/or to the emergence of threats to the security of personal data, to respond the same;
- management of configuration of the information system and the system for protecting personal data.

4.6. In order to ensure that the level of protection of personal data is consistent with the requirements of Federal Law No. 152-FZ as of July 27, 2006 "On Personal Data" and the Federal Law No. 149-FZ as of July 27, 2006 "On Information, Information Technologies and Information Protection", the Operator shall not disclose information on the specific means used and measures to ensure the information security of personal data.

4.7. The Operator shall not disclose the personal data received from the Subject. It is not considered a violation of the provision by the Operator of personal information to agents and

third parties acting on the basis of a contract with the Operator for the performance of obligations to the Personal Data Subject. The disclosure of information in accordance with reasonable and applicable requirements of the law shall not be considered a violation of obligations.

5. Consent to Receive Advertising Information on Telecommunication Networks

5.1. By registering as a visitor or exhibitor or other event, leaving an application for receiving the newsletter, subscribing to the receipt of advertising information:

- at the Operator's Service Center (by filling in the relevant document in hard copy);
- on the Operator's Website (by ticking the Personal Data Subject on the corresponding web page);

- by phone orally when contacting the Operator's Service Center, the Subject agrees to the processing of his personal data and receipt of information messages from the Operator and third parties involved by the Operator, including commercial advertising information (advertising) specified in clause 1.8.2 of this Policy, over telecommunication networks (provided by the mobile phone number and e-mail address).

5.2. By giving consent, specified in clause 5.1 of this Policy, the Personal Data Subject confirms that he acts on his own account and in his own interests, and that the said personal data are reliable.

6. Concluding Provisions

6.1. This Policy shall be approved by the order of the Director of Krasnogorsk Branch "Crocus Expo" of JSC CROCUS and shall become effective from the date of its signing.

6.2. This Policy may include amendments and supplements to be approved by the order of the Director of Krasnogorsk Branch "Crocus Expo" of JSC CROCUS.

6.3. The current version of the Policy is posted online at: www.crocus-expo.ru, as well as on official websites of exhibitions and other events, the organizer (sponsor) of which is JSC CROCUS.