

**Subject:** Policy on personal data processing in PJSC Enel Russia**Application Areas**Perimeter: *Russia*

Staff Function: -

Service Function: *Security*

Business Line: -

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ENDORSED BY

GENERAL DIRECTOR OF PJSC ENEL RUSSIA



CARLO PALASCIANO VILLAMAGNA

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## 1. DOCUMENT AIMS AND APPLICATION AREA

This Policy is drawn up for internal use only, is applied and is subject to interpretation only in the Company interests. This document determines the policy of PJSC Enel Russia in relation to personal data processing and implementation of requirements for personal data protection (hereinafter referred to as the "Policy") established in Articles 18.1,19 of Federal Law No. 152-FZ "On personal data" dated 27.07.2006.

Requirements hereof are applicable to all organizational units of the Company.

All employees of the Company shall be familiarized herewith against signature.

## 2. DOCUMENT VERSION MANAGEMENT

Version	Data	Main changes description
1	25.03.2019	Issuing of 410 policy.

## 3. UNITS IN CHARGE OF THE DOCUMENT

Responsible for drawing up the document:

- PJSC Enel Russia: Security Department

Responsible for authorizing the document:

- PJSC Enel Russia: Department of HR and Organizational Development

## 4. REFERENCES

- Articles of association of PJSC Enel Russia
- Code of Ethics of PJSC Enel Russia;
- Zero Tolerance of Corruption Plan;
- Policy of PJSC Enel Russia on information security No. 0297-PL-SEC.

## 5. ORGANIZATIONAL PROCESS POSITION IN THE PROCESS TAXONOMY

Process area: Security

Macroprocess: information Classification and data protection

## 6. DEFINITIONS AND ACRONYMS

Acronym and Key words	Description
Automated processing of personal data	Personal data processing using computer equipment.

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Personal data blocking	Temporary suspension of personal data processing (except for cases if processing is required for personal data clarification).
Information system of personal data	Set of personal data included in databases, as well as information technologies and technical means making it possible to process them.
Information	Details (messages, data) regardless of the form of presentation.
Confidentiality of personal data	Mandatory requirement for a person who obtained access to certain information, not to transfer such information to third parties without the owner's consent.
Medium	Any material object used to keep and transfer information.
Personal data anonymization	Actions that lead to impossibility to determine belonging of personal data to a certain personal data subject without additional information.
Personal data processing	Any action (operation) or a set of actions (operations) performed using means of automation or without using such means with personal data, including personal data collection, recording, systematization, accumulation, safekeeping, clarification (update, change), extraction, use, transfer (diffusion, provision, access), anonymization, blocking, deletion, destruction.
Personal data	Any information related to directly or indirectly determined individual or individual subject to determination (personal data subject).
Provision of personal data	actions aimed at personal data disclosure to specific person or range of persons.
Diffusion of personal data	Actions aimed at personal data disclosure to the general public.
Destruction of personal data	Actions that lead to impossibility to restore contents of personal data in the personal data information system and (or) that lead to destruction of personal data material media.
Company	PJSC Enel Russia
Operator	PJSC Enel Russia processing personal data, as well as determining the personal data processing objectives, composition of personal data subject to processing, actions (operations) with personal data.

## 7. PROCESS DESCRIPTION

### 7.1 In order to ensure rights and freedoms of an individual and citizen when processing their PD the Company and its representatives should be governed by the following principles:

- personal data is processed in lawful and fair manner;
- personal data processing is limited to specific, pre-determined and legitimate purposes. Personal data processing incompatible with the purposes of personal data collection shall not be allowed;
- it shall not be allowed to combine databases containing personal data being processed for the purposes incompatible with each other;
- only personal data that complies with the objectives of its processing shall be subject to processing;

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- composition and scope of personal data being processed shall comply with the specified purposes of processing and shall not be excessive in relation to the specified objectives of their processing;
- when processing personal data, accuracy of personal data, their sufficiency and, if required, their relevance in relation to the purposes of personal data processing shall be ensured. The required measures shall be taken to delete or clarify incomplete or inaccurate data;
- personal data shall be kept in the form that allows for determining the personal data subject no longer than required for the purposes of personal data processing, if the personal data safekeeping term is not established by the Federal law, contract where one of the parties, beneficiary or guarantor is the personal data subject. Upon achievement of the processing objectives or in case of loss of the necessity to achieve these purposes, unless otherwise provided by the Federal law, personal data being processed shall be subject to destruction or anonymization.

## 7.2 LEGAL GROUNDS FOR PERSONAL DATA PROCESSING

**Personal data is processed in the Company in accordance with the following documents:**

- Labour Code of the Russian Federation No. 197-FZ dated 30.12.2001;
- Federal Law No. 167-FZ "On compulsory pension insurance in the Russian Federation", dated 15.12.2001;
- Federal Law No. 2487-1 "On private detective and security activities in the Russian Federation", dated 11.03.1992;
- Federal Law No. 224-FZ "On combating unlawful use of insider information and market manipulation and on introduction of amendments to certain legal acts of the Russian Federation", dated 27.07.2010;
- Decree of the Government of the Russian Federation No. 719 "On approval of the Regulation on military registration", dated 27.11.2006;
- Charter of PJSC Enel Russia.

## 7.3 OBJECTIVE OF PERSONAL DATA PROCESSING

- 1) Personal data is processed in the Company in order to ensure access control, support in training and career development, ensure compliance with the Labour Code and other regulatory acts of the Russian Federation, account personnel, perform the employer's obligations under the employment contract, keep the list of insiders and so on. A full list of purposes, composition of personal data being processed to achieve them and processing time are given in the document "List of personal data being processed in PJSC Enel Russia".
- 2) Personal data of visitors shall be collected in order to protect the Company's employees and property.

## 7.4 COMPOSITION AND SUBJECTS OF PERSONAL DATA

**Personal data processed by the Company include but is not limited to:**

- full name;
- sex;
- nationality;
- date and place of birth;
- details of the ID document;

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- contact information;
  - taxpayer's identification number;
  - number of the state pension insurance certificate;
  - family status;
  - military status;
  - information about education, profession, qualification or special knowledge;
  - information about labour and total work experience;
  - certificate on attestation, advance training;
  - information about encouragement and awards;
  - information about salary and social benefits;
  - information about disability (degree, document on the basis of which the disability degree was assigned);
  - details of settlement/personal account;
  - income;
  - organizational unit, position;
  - photo;
  - information about registration and place of residence
  - data included in various civil contracts.
  - and so on.

Personal data of the following subjects is processed in the Company:

- a)** subjects whose personal data is processed within labour relations or for entering into them:
  - employees of the Company;
  - candidates (applicants) for vacant positions in the Company;
  - relatives or referees of candidates (applicants) for vacant positions in the Company;
  - relatives of the Company's employees
- b)** subjects whose personal data is processed during the Company's main activity:
  - persons performing works under contracts (counterparties);
  - out-of-staff employees;
  - persons who are not employees of the Company but temporarily located in its territory (visitors).

## 7.5 PERSONAL DATA PROCESSING

Personal data is processed by the Company both with and without means of automation (on paper medium). The operator shall not provide and disclose information containing personal data of subjects to any third party without the personal data subject's consent unless when it is required to prevent threats to life and health and in cases determined by the Federal law.

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Solely to perform the functions and powers determined by the laws, the personal data subject's personal data can be transferred without his/her consent upon reasoned request to:

- judicial authorities in connection with justice administration;
- Federal Security Service authorities;
- prosecution authorities;
- police;
- other authorities and institutions in cases determined by binding regulatory legal acts.

Safekeeping terms for personal data media are determined by internal regulatory documents of the Company.

## 7.6 CONFIDENTIALITY OF PERSONAL DATA

**7.6.1.** Information related to personal data that became known in connection with employment relationship implementation and in connection with the Company services rendering and functions performance shall be confidential and protected by law.

**7.6.2.** The Company employees and other persons who obtained access to personal data being processed signed an obligation not to disclose confidential information, as well as were warned on possible disciplinary, administrative, civil and criminal responsibility in case of violation of standards and requirements of the applicable laws of the Russian Federation in the area of personal data processing.

## 7.7 RIGHTS OF PERSONAL DATA SUBJECTS

**7.7.1.** The personal data subject shall be entitled to receive information regarding processing of his/her personal data, including:

- confirmation of the fact of personal data processing by the Operator;
- legal grounds and objectives of personal data processing;
- objectives and personal data processing methods used by the Operator;
- name and location of the Operator, information about persons (excluding the Operator's employees) who have access to personal data or to whom personal data can be disclosed on the basis of the contract with the Operator or on the basis of the Federal law;
- personal data being processed related to the relevant personal data subject, their source, unless another procedure for such data provision is provided by the Federal law;
- terms of personal data processing including terms of data keeping;
- procedure for the personal data subject's exercise of rights under the Federal Law "On personal data";
- information about performed or expected cross-border data transfer;
- name or full name and address of the person processing personal data under the Operator's instruction, if processing is assigned or will be assigned to such person;
- other information provided for by the Federal Law "On personal data" or other federal laws.

**7.7.2.** Personal data subject shall be entitled to require the Operator to clarify his/her personal data, block or destruct them if personal data is incomplete, outdated, inaccurate, illegally obtained or are not required for the specified objective of processing, as well as take legal action to protect his/her rights.

**7.7.3.** If the personal data subject considers that the Operator processes his/her personal data with violation of the Federal Law "On personal data" or otherwise violates his/her rights and freedoms, the personal data subject shall be entitled to appeal against the Operator's actions or omission to a higher authority



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to protect rights of personal data subjects (Federal Service for Supervision of Communications, Information Technology and Mass Media) or in a judicial procedure.

- 7.7.4.** The personal data subject shall be entitled to protect his/her rights and legitimate interests, including reimbursement for losses and (or) compensation for moral damages in a judicial procedure.
- 7.7.5.** Other rights determined in Chapter 3 of the Federal Law "On personal data".

## **7.8 IMPLEMENTATION OF MEASURES PROVIDED FOR IN ARTICLES 18.1, 19 OF THE FEDERAL LAW "ON PERSONAL DATA"**

- 7.8.1.** Person responsible for organization of personal data processing in the Company was appointed by order of the General Director.
- 7.8.2.** Order of the Company head approved the Regulation on personal data processing, other local acts determining procedures aimed at detecting and preventing violations of the laws of the Russian Federation in the area of personal data, as well as determining for each purpose of personal data processing the content of personal data being processed, categories of subjects whose personal data is processed, terms of their processing and safekeeping, procedure for their destruction upon processing objectives achievement or upon other legal grounds;
- 7.8.3.** Legal, organizational and technical measures provided for in the regulatory legal acts shall apply to ensure security of personal data during their processing in the Company information systems of personal data.
- 7.8.4.** When processing personal data without automation means, requirements shall be complied with that are determined by Decree of the Government of the Russian Federation dated September 15, 2008 No. 687 "On approval of the Regulation on peculiarities of personal data processing without automation means";
- 7.8.5.** In order to perform internal control of compliance of personal data processing with the requirements established in the Company, periodic inspections of personal data processing conditions are organized.
- 7.8.6.** Employees of the Company directly involved in personal data processing familiarize themselves with the provisions of the Russian laws on personal data (including requirements for personal data protection), local acts concerning personal data processing.
- 7.8.7.** The company shall be responsible for violation of obligations to ensure personal data security and confidentiality during their processing in accordance with the laws of the Russian Federation.

## **7.9 REVISION OF POLICY PROVISIONS**

- 7.9.1.** Provisions hereof shall be revised as required but at least once a year and in case of:
- changes in the laws of the Russian Federation as regards personal data;
  - changes in the composition of persons to whom the Company assigns personal data processing;
  - detection of inconsistencies affecting personal data processing;
  - following the results of compliance control with the requirements on personal data processing and protection;



PJSC Enel Russia

Policy no. 410

Version no. \_\_\_1\_\_\_ dated 25.03.2019

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– upon resolution of the Company's management.

**7.9.2.** Upon revision of provisions hereof its updated version shall be published on the Company website – <http://enelrussia.ru>