

Basic concepts, terms and definitions

Automated processing of personal data is the processing of personal data using computer technology.

Blocking of personal data is a temporary cessation of the processing of personal data (except in cases where processing is necessary to clarify personal data).

Personal Data Law – Federal Law of the Russian Federation of June 27, 2006 No. 152-FZ “On Personal Data”.

Personal data information system – a set of personal data contained in databases and the information technologies and technical means that ensure their processing.

Anonymization of personal data is an action that makes it impossible to determine the ownership of personal data by a specific subject of personal data without the use of additional information.

Personal data processing is any action (operation) or set of actions (operations) with personal data, performed with or without the use of automated tools. Personal data processing includes, but is not limited to: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction.

Personal data operator (operator) – a state body, municipal body, legal entity or individual that, independently or jointly with other persons, organizes and (or) carries out the processing of personal data, and also determines the purposes of processing personal data, the composition of personal data to be processed, and actions (operations) performed with personal data.

Personal data – any information relating to a directly or indirectly identified or identifiable natural person (subject of personal data).

The Personal Data Processing and Protection Policy (hereinafter referred to as the Policy) is a document that contains a description of a set of rules, procedures, and measures aimed at protecting personal data, its confidentiality, integrity, and accessibility.

Provision of personal data – actions aimed at disclosing personal data to a specific person or a specific group of persons.

Dissemination of personal data – actions aimed at disclosing personal data to an indefinite number of persons.

Cross-border transfer of personal data is the transfer of personal data to the territory of a foreign state to a government body of a foreign state, a foreign individual or a foreign legal entity.

Destruction of personal data – actions that make it impossible to restore the content of personal data in the personal data information system and/or that result in the destruction of tangible media containing personal data.

General Provisions

" Softline " (Softline Group of Companies) - PJSC " Softline " and its affiliates listed in the corporate information disclosure [list](#) on the Interfax website) strives to ensure the protection of the Personal Data of its clients, employees, business partners and any other persons.

This Policy has been developed in accordance with the requirements of Russian legislation, including the requirements of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" and other by-laws in the field of personal data protection.

This Policy sets forth:

- Principles of personal data processing.
- Legal grounds for processing personal data.
- Rights and obligations of personal data subjects and Softline .
- Purposes of collecting and processing personal data.
- Categories of personal data processed and categories of personal data subjects.
- Procedure and conditions for processing personal data.
- Conditions for the transfer of personal data of subjects to third parties.
- Measures taken by Softline to ensure the security and confidentiality of personal data.
- Updating, correcting, deleting, destroying personal data and requests from subjects for access to personal data.

Responsibility for violation of the requirements of the legislation of the Russian Federation and the regulations of Softline in the field of processing and protection of personal data is determined in accordance with the legislation of the Russian Federation.

Principles of personal data processing

When processing personal data, Softline is guided by the following principles.

Legitimacy – personal data is processed only on legal grounds.

Purposefulness – processing must have a specific, pre-defined purpose. Unjustified collection and use of personal data that could violate the rights and freedoms of data subjects is prohibited.

Compliance – the processing of personal data must comply with the conditions prescribed by law. Personal data may only be used for the purpose for which it was collected and may not be further used without the express consent of the data subject.

Accuracy – personal data must be accurate, complete and current in accordance with the purposes for which it is processed.

Limitation – processing must be limited to the minimum amount of data necessary to achieve the purpose of processing. The storage period for personal data must be limited, and after this period, it must be destroyed.

Security – when processing, measures must be taken to protect data from unauthorized access, use, modification and distribution.

Legal grounds for processing personal data

The legal basis for the processing of personal data is a set of regulatory legal acts, pursuant to which and in accordance with which Softline processes personal data, including:

- Constitution of the Russian Federation.
- Civil Code of the Russian Federation.
- Labor Code of the Russian Federation.
- Tax Code of the Russian Federation.
- Federal Law of 08.02.1998 N 14-FZ "On Limited Liability Companies".
- Federal Law of 06.12.2011 N 402-FZ "On Accounting".
- Federal Law of 15.12.2001 N 167-FZ "On Compulsory Pension Insurance in the Russian Federation".
- Other regulatory legal acts governing relations related to the activities of Softline .

The legal grounds for processing personal data also include:

- Charter and constituent documents of " Softline ".
- Agreements concluded between Softline and clients/counterparties.
- Agreements concluded between Softline and personal data subjects.
- Consent of personal data subjects to the processing of their personal data.

Rights and obligations of Softline when processing personal data

When processing personal data of subjects, Softline has the right to:

- Independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the legislation on personal data, unless otherwise provided by the Law on Personal Data or other federal laws.
- Entrust the processing of personal data to a third party with the consent of the personal data subject, unless otherwise provided by federal law, based on an agreement concluded with that party. The party processing personal data on behalf of Softline is obligated to comply with the principles and rules for processing personal data stipulated by personal data legislation, maintain the confidentiality of personal data, and take the necessary measures to ensure compliance with the obligations stipulated by the Personal Data Law.
- Require the Personal Data Subject to provide reliable personal data necessary for the execution of the contract, provision of the service, identification of the Personal Data Subject, as well as in other cases stipulated by the legislation of the Russian Federation.
- Restrict the personal data subject's access to his/her personal data if the personal data subject's access to his/her personal data violates the rights and legitimate interests of third parties, as well as in other cases stipulated by the legislation of the Russian Federation.
- Process publicly available personal data of individuals.
- Process personal data subject to publication or mandatory disclosure in accordance with the legislation of the Russian Federation.

- In the event that the subject of personal data revokes consent to the processing of personal data, Softline has the right to continue processing personal data without the consent of the subject of personal data if there are grounds specified in the Law on Personal Data.

When processing personal data of subjects, Softline is obliged to:

- Organize the processing of personal data in accordance with the requirements of personal data legislation.
- Respond to requests and inquiries from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law.
- Provide the authorized body for the protection of the rights of personal data subjects (the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor)) with the necessary information upon request of this body.
- Take measures to clarify and destroy the personal data of the subject of personal data in connection with his (his legal representative's) appeal with legal and justified demands.
- Organize the protection of personal data in accordance with the requirements of Russian legislation.

Rights of the personal data subject

The subject of personal data has the right:

- Receive information regarding the processing of their personal data, except in cases stipulated by federal laws. Information is provided to the personal data subject in an accessible form and must not contain personal data related to other personal data subjects, unless there are legal grounds for disclosure of such personal data.
- Request that Softline clarify his personal data, block it or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, and also take measures provided by law to protect his rights.

When receiving requests from personal data subjects related to the exercise of rights granted by the Personal Data Law, or on other issues related to the processing of personal data, in exceptional cases, Softline may request additional information.

In the event of a personal data subject's refusal to provide additional information upon request, Softline will not be able to exercise the subject's rights if such information is necessary for their correct implementation, or the request will be processed incorrectly, or the information will not be provided in full.

Softline has the right to refuse the exercise of rights by the subject of personal data, or to limit the scope of obligations for their implementation, if:

- the personal data subject sends a request in a form and content that does not comply with the requirements of the legislation and/or the Policy, if a special form has been established for such requests;
- This is provided for by the requirements of legislation (for example, on operational investigative activities, combating money laundering, etc.).

Purposes of personal data processing

Softline processes only those personal data of personal data subjects that are necessary for the implementation of effective activities.

Personal data is processed for the following purposes:

- Ensuring compliance with the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation, as well as local regulatory acts of " Softline ".
- Carrying out its activities in accordance with the Charter, including the conclusion and execution of contracts with clients and counterparties.
- Enforcement of labor legislation within the framework of labor and other directly related relationships, including: assisting employees in finding employment, obtaining education and career advancement, attracting and selecting job candidates, monitoring the quantity and quality of work performed, maintaining personnel and accounting records, submitting required reporting forms to authorized bodies, organizing the individual (personalized) registration of employees in the compulsory pension insurance and compulsory social insurance systems, etc.
- Compliance with tax legislation in connection with the calculation and payment of personal income tax, unified social tax, and pension legislation in the formation and provision of personalized data on each income recipient, taken into account when calculating insurance premiums for compulsory pension insurance.
- Implementation of administrative and economic activities.
- Implementation of employee identification in the Softline information systems .
- Softline employees with additional compensation, including voluntary health insurance.
- Ensuring operational communication and organizing collaboration, managing sales, tasks, and projects.
- Posting of publications about events, news and informational publications on websites and social networks.
- Providing information about Softline , products and services, improving products and services, developing new products or services of Softline , improving customer experience, quality of services and products.
- Identification of the party within the framework of the provision of services.
- Formation of statistical reports.
- Providing access control and internal facility regimes.
- Performance of functions, powers and duties assigned to Softline by the legislation of the Russian Federation .
- Other purposes stipulated by the legislation of the Russian Federation.

Categories of personal data

The content and volume of personal data processed must correspond to the stated processing purposes. The personal data processed must not be excessive in relation to the stated processing purposes.

Candidates for vacant positions

For the purposes of enforcing labor legislation within the framework of labor and other directly related relations:

- Last name, first name, patronymic.
- Floor.
- Citizenship.
- Date and place of birth.
- Address of place of residence.
- Contact information (phone number, email address).
- Information about education, work experience, qualifications.
- Other personal data provided by candidates in their resumes and cover letters.

Employees and former employees

For the purposes of enforcing labor legislation within the framework of labor and other directly related relations:

- Last name, first name, patronymic.
- Floor.
- Citizenship.
- Date and place of birth.
- Image (photograph).
- Proficiency in foreign languages.
- Passport details (series, number, by whom and when issued).
- Registration address at the place of residence.
- Address of actual place of residence.
- Contact information (phone number, email).
- Taxpayer identification number.
- Individual insurance account number (SNILS).
- Educational information (name of educational institution, diploma number, field of study or specialty according to diploma, qualification according to diploma, date of graduation).
- Information on postgraduate professional education (name of educational or scientific institution, diploma and certificate numbers, date of completion, academic degree, academic title).
- Information on advanced training (type of advanced training, name of educational institution, document (certificate, certificate)).
- Marital status, degree of kinship, last names, first names, patronymics, dates of birth of close relatives (father, mother, brothers, sisters and children), as well as husband (wife).
- Information about work experience.
- Information on military registration.
- Driver's license (series, number, vehicle category, date of issue).
- Other personal data provided by employees in accordance with the requirements of labor legislation.

Representatives (employees) of clients and counterparties (legal entities)

For the purposes of carrying out its activities in accordance with the Charter:

- Last name, first name, patronymic.

- Passport details.
- Contact details.
- Position held.
- Other personal data provided by representatives (employees) of clients and counterparties, necessary for the conclusion and execution of contracts.

Users (visitors) of the website

For the purposes of carrying out its activities in accordance with the Charter:

- Last name, first name, patronymic.
- Date of birth.
- Residential address.
- Delivery address.
- Contact information (phone number, email address).
- Information about the organization.
- Position held.
- payment card details.
- Other personal data that the user (visitor) provides about himself/herself when registering on the website or while using the services.

Softline receives personal data that is generated during the user's use of the Website, or that is received from the user's device, namely:

- device data (including MAC address, IP address, IDFA, Google Advertising ID, device operating system data, browser data, screen resolution).
- push tokens (small technical files that allow push notifications to be sent correctly).
- cookies (a technology used to automatically collect information, mostly of a technical nature).
- data obtained as a result of the analysis of other data obtained during the use of the Website or provided by the user.

Softline does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, health status, or intimate life, except in cases stipulated by Russian legislation.

Procedure and conditions for processing personal data

Personal data is processed by Softline in accordance with the requirements of the legislation of the Russian Federation.

The processing of personal data is carried out with the consent of the subjects of personal data to the processing of their personal data, as well as without such consent in cases stipulated by the legislation of the Russian Federation.

Processing can be carried out in the following ways: automated, non-automated, mixed.

In order to achieve the processing purposes, Softline may perform the following actions with user data: collection, receipt, systematization, accumulation, storage, updating, modification, recording, retrieval, use, deletion, blocking, destruction, transfer (provision, access), clarification.

Disclosure and distribution of personal data to third parties is prohibited without the consent of the personal data subject, unless otherwise provided by federal law. Consent to the processing of personal data authorized for distribution by the personal data subject is issued separately from other consents of the personal data subject for the processing of their personal data.

To ensure the fulfillment of obligations stipulated by the Federal Law of the Russian Federation of June 27, 2006 No. 152-FZ "On Personal Data" and the regulatory legal acts adopted in accordance with it, Softline ensures the security and maintains the confidentiality of personal data of personal data subjects.

Softline has taken the following measures to protect personal data:

- A person responsible for organizing the processing of personal data has been appointed.
- Threats to the security of personal data during its processing have been identified.
- Local regulations have been issued on the processing and security of personal data, as well as regulations establishing procedures aimed at preventing and identifying violations of Russian legislation and eliminating the consequences of such violations.
- Rules for access to personal data processed in personal data information systems have been established.
- All actions performed with personal data are registered and recorded in personal data information systems.
- Personal data is stored under conditions that ensure their safety and prevent unauthorized access.
- Training of Softline employees on the requirements and rules for working with personal data was organized.

Softline stores personal data in a form that allows the identification of the subject of the personal data for no longer than is required for the purposes of processing the personal data, unless the storage period for personal data is established by federal law or an agreement .

Softline ceases processing personal data in the following cases :

- achieving the purpose of their processing;
- identification of facts of their illegal processing;
- expiration of the established processing period;
- revocation of personal data by the subject if, according to the law, the processing of this data is permitted only with consent.

Upon achieving the objectives of personal data processing, as well as in the event of the personal data subject's withdrawal of consent to their processing, Softline shall cease processing these data if:

- unless otherwise provided by an agreement to which the subject of personal data is a party, beneficiary or guarantor;
- " Softline " does not have the right to process personal data without the consent of the subject on the grounds provided for by the Law on Personal Data or other federal laws;

- unless otherwise provided by another agreement between Softline and the subject of personal data.

If a personal data subject requests that the processing of personal data cease within 10 business days from the date Softline receives the request, the processing of the personal data will cease, except in cases stipulated by the Personal Data Law. This period may be extended, but by no more than five business days. To do so, Softline must send the personal data subject a reasoned notice stating the reasons for the extension.

When collecting personal data, including through the Internet information and telecommunications network, Softline ensures the processing of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation.

Softline , together with the personal data subject, takes all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of personal data.

Updating, correcting, deleting, destroying personal data and requests from subjects for access to personal data

If the subject of personal data wishes to exercise the right to access his personal data (to the extent provided for in Article 14 of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data"), he must send a written request by mail to the legal address of Softline PJSC .

The request must contain:

- the number of the main document certifying the identity of the personal data subject or his legal representative;
- information about the date of issue of the specified document and the issuing authority;
- information confirming the fact of processing of the subject's personal data by Softline ;
- telephone number and email address;
- information and data that the subject of personal data or his legal representative wishes to receive;
- signature of the subject of personal data or his legal representative.

Softline may refuse to satisfy the request of the personal data subject if the request does not comply with the form or the information provided above is not indicated, or the request is not sent in the manner specified above .

The right of a personal data subject to access his/her personal data may be limited in accordance with Part 8 of Article 14 of the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data", including if the personal data subject's access to his/her personal data violates the rights and legitimate interests of third parties.

If the subject of personal data discovers that inaccurate personal data has been provided (for example, an error was made when providing it, the data is outdated or no longer relevant), the subject of personal data or his legal representative has the right to contact Softline and indicate the data that needs to be clarified.

" Softline ", based on the information provided by the subject of personal data or his legal representative, clarifies (updates) personal data in accordance with the request.

If the subject of personal data or his legal representative discovers that his personal data is being processed unlawfully, the subject of personal data or his legal representative has the right to contact Softline and indicate the data that is being processed unlawfully.

When receiving such requests, Softline :

- checks incoming messages;
- if necessary, blocks data for the verification period;
- If information about the illegality of processing is confirmed, the data is deleted.

The right to withdraw consent to the processing of personal data

To revoke consent to the processing of personal data, the subject of personal data must submit an application to revoke consent to the processing of personal data.

An application for withdrawal of consent to the processing of personal data may be drawn up in a free and convenient form for the subject of personal data.

An application for withdrawal of consent must contain the following information:

- surname, first name and patronymic of the subject;
- telephone number and email address;
- signature.

An application for withdrawal of consent to the processing of personal data may be sent by mail to the legal address of Softline PJSC .

Requests related to the implementation of the rights of personal data subjects are processed and fulfilled by Softline within the timeframes established by current legislation: no later than 10 (ten) business days (unless another period is provided by current legislation) from the date of receipt of such request.

The processing period for a request related to the exercise of a personal data subject's rights may be extended by 5 (five) business days. If such a need arises, Softline will notify the personal data subject, stating the reasons for the extension.

Other requests related to the Policy and data processing are processed depending on the current workload of our specialists. If consultation with internal specialists is necessary to provide an appropriate response to your request, the response time may be extended, of which Softline will notify you in advance.

Transfer of personal data to third parties

The personal data of the subject is kept confidential, except in cases of processing personal data, access to which is granted to an unlimited number of persons by the subject himself or at his request.

Softline has the right to transfer personal data of the personal data subject to third parties in the following cases:

- The subject of personal data has expressed consent to such actions.
- The transfer is necessary to fulfill obligations under orders, contracts and other obligations to the subject of personal data.
- The transfer is provided for by Russian legislation within the framework of the established procedure.
- The transfer is necessary to achieve the goal, implement and perform the functions, powers and duties imposed by the legislation of the Russian Federation on Softline .

Postal organizations and courier services that deliver and issue goods purchased by the subject of personal data may request personal data necessary for identifying the subject of personal data (including passport data).

Relationships regarding the provision and processing of such personal data arise between the subjects of personal data and the persons requesting them.

Softline may transfer personal data in the event of a merger, sale, or reorganization of Softline or a portion of Softline (including transfers made as part of bankruptcy proceedings). Personal data may be transferred to a successor company. Softline will take reasonable steps to ensure that any successor company treats the information received in accordance with this Policy.

Cross-border data transfer for visitors to the store.softline.ru and allsoft.ru websites

Cross-border data transfer is carried out by Softline only with the consent of the Personal Data Subject to the processing of his personal data.

The transfer is carried out for the following purposes:

Google Application Analytics to analyze how visitors use the website.

Categories of personal data transferred: IP address, cookies .

Categories of data subjects whose data is transferred: clients, website visitors.

Foreign countries where the transfer takes place: USA, Chile, Ireland , the Netherlands, Denmark, Finland, Belgium, Taiwan, Singapore.

☑ Communication with foreign counterparties.

Categories of personal data transferred: last name, first name, patronymic, email address, telephone number, position, voice data. Categories of personal data subjects whose data is transferred: employees. Foreign countries in which the transfer takes place: Kazakhstan, Belarus, Uzbekistan, Switzerland, Estonia, Bulgaria, Moldova, Latvia, Turkmenistan, Azerbaijan, the British Virgin Islands, Armenia, the Republic of Cyprus.

Use of WhatsApp and Telegram messengers to respond to customer inquiries on the website (store.softline.ru only).

Categories of personal data transferred: last name, first name, email address, phone

number. Categories of personal data subjects whose data is transferred: customers, website visitors. Foreign countries where the transfer takes place: USA, Denmark, Sweden, Ireland.

☑ Using Microsoft services Teams and SharePoint Online for business communication (only for allsoft.ru).

Categories of personal data transferred: last name, first name, middle name, email address, telephone number, job title, voice data. Categories of personal data subjects whose data is transferred: employees. Foreign countries where the transfer takes place: UAE.