



APPROVED
By Order No. 29
of «BC «Zenit» LLC
General Director
A.V. Tserkovny */signature/*
«28» November 2019
St.Petersburg

[Common seal: Limited Liability Company * Saint-Petersburg * Zenit Basketball Club]

Personal Data Processing Policy

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1. General

1.1 Personal Data Processing Policy (hereinafter the Policy) at Zenit Basketball Club Limited Liability Company (hereinafter "BC "Zenit" LLC) is developed in compliance with the requirements of Clause 2 Part 1 Art. 18.1 of Federal Law No. 152-ФЗ "On Personal Data" dated July 27, 2006 (hereinafter the Law) in order to protect civil rights and liberties in processing personal data, including protection of personal privacy rights.

1.2 The Policy establishes the procedure for receiving, searching, collecting, systematizing, accumulating, storing, clarifying, updating, changing, using, distributing (including transferring), depersonalizing, blocking, destroying, record keeping of documents containing information related to personal data using computer equipment or without it.

1.3 This Policy is an element of the scope of measures taken by "BC "Zenit" LLC to protect the processed personal data from unauthorized access, destruction, distortion or disclosure.

1.4 The Policy applies to relations in the sphere of personal data processing that have arisen at "BC "Zenit" LLC both before and after the approval of this Policy.

1.5 Pursuant to the requirements of Article. 18.1, Part 2, of the Law, this Policy is published freely available on the "BC "Zenit" LLC Internet website.

1.6 Legal basis for personal data processing:

- 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 No. 14-ФЗ "On Limited Liability Companies" dated 08.02.1998;
- Federal Law No. 402-ФЗ "On Accounting" dated 06.12.2011;
- Federal Law No. 167-ФЗ "Concerning Compulsory Pension Insurance in the Russian Federation" dated 15.12.2001;
- other legislative acts regulating relations connected with the activities of the Operator;
- "BC "Zenit" Articles of Organization;
- Contracts concluded between "BC "Zenit" LLC and personal data owners;
- consent of personal data owners to processing their personal data.

2. Key Terms

In accordance with the legislation in force, the following terms apply to this Policy:

personal data — any information relating directly or indirectly to a defined or definable individual (personal data owner);

operator — a state body, municipal body, legal or physical entity organizing and (or) processing independently or jointly with other persons personal data, as well as establishing the purposes of personal data processing, amount of personal data to be processed, actions (operations) performed with personal data;

personal data processing — any action (operation) or set of actions (operations) with personal data performed using computer equipment or without it, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;

automated personal data processing — personal data processing using computer technology;

personal data dissemination — actions aimed at disclosing personal data to general public;

presentation of personal data — actions aimed at disclosing personal data to a specific person or certain group of persons;

personal data blocking — suspension of personal data processing (unless processing is necessary for personal data clarification);

destruction of personal data — actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which tangible media of personal data are destroyed;

depersonalization of personal data — actions as a result of which it becomes impossible to identify the belonging of personal data to a specific personal data owner without using additional information;

personal data information system — a set of personal data contained in the databases and information technologies and technical means allowing their processing;

confidentiality of personal data — mandatory requirement for the operator or other person who has been granted access to personal data not to allow their dissemination without the consent of the personal data owner or on any other legal basis;

other personal data owners — individuals whose personal data "BC "Zenit" LLC is authorized to process in connection with the concluded contract or consent of the personal data owner, including individuals who are before, during and after the home match present in the sports complex on the basis of a ticket, season pass or invitation, and not involved in the competition, including those participating in the organization and peacekeeping during the match, not being employees or members of "BC "Zenit" LLC;

publicly available personal data — personal data, access to which is granted with the consent of the personal data owner to an unlimited number of persons, or which, in accordance with federal laws of the Russian Federation, are not subject to confidentiality requirement.

3. Procedure for carrying into effect, changes to and termination of Policy

3.1 This Policy is approved and put into effect by Order of "BC "Zenit" LLC General Director from the moment of its issue. The Policy remains in force indefinitely until it is canceled, amended or replaced by a new internal regulatory document.

3.2 All "BC "Zenit" LLC employees should familiarize themselves with the Policy against signature. Keeping the acknowledgment lists (Appendix 7) is done by "BC "Zenit" LLC HR Manager.

4. List of processed personal data

4.1 In order for the parties to the labor contract (employee and employer) to fulfill their obligations and exercise their rights, "BC "Zenit" LLC shall process the personal data of the employees provided for by T-2 Form (Employee data card), approved by Resolution No. 1 of the State Statistics Committee of Russia on 05.01.2004, and also other information about employees in accordance with the "List of employees personal data" processed by "BC "Zenit" LLC.

4.2 Personal data of individuals are processed in order to conclude contracts and perform contractual relations in accordance with the applicable law.

4.3 Personal data of individuals are processed for the purposes of advertising and information mailing, carried out by "BC "Zenit" LLC with the consent of the personal data owners, in accordance with the applicable law.

4.4 In order to implement Federal Law No. 14-ФЗ "On Limited Liability Companies" dated 02.02.1998, personal data of Members, Members of the Board and Members of the Internal Audit Team (Auditor) of "BC "Zenit" LLC are processed.

4.5 Personal data of individuals are processed to sell season passes and tickets to individuals for matches of "Zenith" Basketball Club, as well as other goods, works and services.

5. Personal data processing at "BC "Zenit" LLC

5.1 Processing of personal data at "BC "Zenit" LLC is carried out exclusively on legal basis in accordance with the applicable law.

5.2 Processing of personal data without computer means is carried out by "BC "Zenit" LLC in accordance with the Regulation on the particulars of personal data processing carried out without computer means, approved by Regulation of the Government of the Russian Federation No. 687 dated September 15, 2008.

5.3 Personal data on paper shall be stored in metal cabinets and safes.

5.4 Automated processing of personal data shall be done using IT-equipment.

5.5 Personal data protection is effected by "BC "Zenit" LLC in accordance with the applicable law.

6. Personal data processing of "BC "Zenit" LLC Employees

6.1 Processing of personal data of an employee is carried out solely for the purpose of ensuring laws and other regulatory legal acts, assisting an employee in finding a job, training and career development,

ensuring private security of the employee, preservation of property, control of the quantity and quality of the work performed.

6.2 Acquisition (collection) of personal data of "BC "Zenit" LLC employees is carried out by HR Manager. All personal data of the employee is requested from him. If the employee's personal data can only be obtained from a third party, the employee shall be notified in advance, and a written consent shall be required from him (Appendix 1). "BC "Zenit" LLC shall inform the employee about the purpose, the alleged sources and methods of obtaining personal data, as well as about the nature of the personal data to be received and about the consequences of the employee's refusal to give written consent to receive them.

6.3 "BC "Zenit" LLC shall not request, receive and process personal data of the employee concerning his political, religious and other beliefs, his private life, and other data related to personal data of special category.

6.4 "BC "Zenit" LLC shall not receive or process the personal data of the employee concerning his membership in public associations or trade unions, except to the extent provided for by the Labor Code of the Russian Federation and federal laws.

6.5 Employment books, personnel files, employee personal record forms in T-2 format shall be kept by "BC "Zenit" LLC HR Manager. Documents containing personal data necessary for making salary payments, as well as other payments and deductions to employees (to the Pension Fund, Social Insurance Fund) shall be kept at "BC "Zenit" LLC Accounting Department.

6.6 Archive storage of personal data of "BC "Zenit" LLC employees shall be on paper in metal cabinets and safes.

6.7 When making decisions affecting the interests of an employee, "BC "Zenit" LLC shall not use the personal data of the employee obtained solely as a result of their automated processing.

7. Personal data processing of "BC "Zenit" LLC members, Members of the Board and Members of the Internal Audit Team

7.1 Personal data of Members, Members of the Board and Members of the Audit Team (Auditor) of "BC "Zenit" LLC shall be provided and processed on the basis and to the extent necessary to fulfill the requirements of Federal Law No. 14-Φ3 "On Limited Liability Companies" dated 08.02.1998.

8. Personal data processing of other personal data owners

8.1 Processing by "BC "Zenit" LLC of third party personal data is performed solely for the purposes and in the amount stated in the consent of the personal data owner to processing of his personal data acquired by "BC "Zenit" LLC on legal grounds directly from the personal data owner or his authorized representative.

8.2 "BC "Zenit" LLC performs personal data processing in full compliance with the current legislation requirements and exclusively in the interests of the personal data owner and of "BC "Zenit" LLC.

9. Access to personal data

9.1 Access to personal data is permitted only to those employees of "BC "Zenit" LLC who need personal data to perform their functional duties according to the List of employees allowed to work with personal data at "BC "Zenit" LLC. Access of other persons to personal data is granted on the basis of a written permit issued by "BC "Zenit" LLC General Director.

9.2 Access to personal data concerning health status of "BC "Zenit" LLC regular and youth system players is restricted to medical personnel who are professionally involved in medical activities and are required to maintain medical confidentiality in accordance with the legislation of the Russian Federation.

9.3 For information support of "BC "Zenit" LLC activities, internal publicly accessible sources of personal data may be created (including telephone directories, address books, corporate directory service, etc.).

9.4 External access to personal data of employees by virtue of current legislation and in accordance with contractual relations is granted to:

- the RF Federal Tax Service bodies;
- military registration and enlistment offices;
- RF Pension Fund and its local agencies;
- Federal Compulsory Medical Insurance Fund of the Russian Federation and its local agencies;
- Social Insurance Fund of the Russian Federation and its local agencies;
- law enforcement agencies, authorities of the RF Prosecutor's Office, the Federal Service of Court Bailiffs and its local agencies and other bodies of state power within the powers granted to them by law;
- insurance companies under life and health compulsory and voluntary medical insurance contracts concluded by the employer with employees.

10. Personal data protection

10.1 Protection of personal data at "BC "Zenit" LLC is a system of measures ensuring prevention of unauthorized access to personal data, of their unlawful modification, destruction, use, disclosure or dissemination. In order to protect personal data, "BC "Zenit" LLC shall take legal, organizational and technical measures in accordance with the applicable federal laws and internal regulatory documents of "BC "Zenit" LLC in the sphere of information protection.

10.2 "BC "Zenit" LLC shall keep personal data in a format allowing to identify the personal data owner:

- for no longer than the purpose of personal data processing requires,
- until the expiration of the owner's consent or until the owner withdraws his consent to personal data processing, or until unlawful processing of personal data is discovered,
- until the termination of "BC "Zenit" LLC activities, unless a different personal data storage period is established by a federal law or a contract.

11. Rights and obligations of the personal data owner and "BC "Zenit" LLC in personal data processing sphere

11.1 "BC "Zenit" LLC in accordance with the applicable law shall:

11.1.1 Comply with the requirements to processing and protection of personal data established by law and monitor the compliance with the requirements of this Policy.

11.1.2 Allow access to personal data of personal data owners only to personal data owners, designated persons or legal representatives of the personal data owner.

11.1.3 Keep a personal data owners' request log (Appendix 4).

11.1.4 Not disclose personal data to a third party without written consent of the personal data owner, unless it is necessary to prevent a threat to life and health of the personal data owner, as well as in other cases provided for by the applicable law.

11.1.5 Not disclose personal data for commercial purposes without written consent of the personal data owner.

11.1.6 Process personal data owners' requests in accordance with the applicable law.

11.1.7 Warn persons receiving personal data from "BC "Zenit" LLC that the data can only be used for the purposes for which they were communicated. This provision of the Policy does not apply to the exchange of personal data of employees in the manner prescribed by the Labor Code of the Russian Federation and other federal laws.

11.1.8 Receive (request) from the employee (and, in cases provided for by law, from third parties) personal data necessary for performance of the obligations of "BC "Zenit" LLC arising from the employment contract, as well as provided for by applicable law.

11.1.9 Request information on the employee's state of health related to the fitness of the employee to perform his employment function.

11.1.10 Receive (request) from the personal data owner personal data necessary for performing the contracted relations or in case of current legislation requirements.

11.1.11 Provide personal data to third parties (including public authorities) without written consent of the personal data owner in cases provided by law only.

11.1.12 Process publicly available personal data of employees in order to organize birthday and anniversary greetings.

11.1.13 Provide access to personal data of employees to specially authorized persons only.

11.2 The employee agrees to:

11.2.1 Provide to "BC "Zenit" LLC complete and reliable personal data.

11.2.2 Present to "BC "Zenit" LLC documents containing personal data provided for by law (including in accordance with Article 65 of the Labor Code of the Russian Federation: passport or other identification document, work record book (except when the employment contract is concluded for the first

time), State pension insurance certificate, military registration documents (for persons liable for military duty and persons subject to conscription), documents on education, qualifications, special training, as well as additional documents in cases provided by law).

11.2.3 In order to properly fulfill by "BC "Zenit" LLC its responsibilities, as well as exercise the rights stipulated by law, immediately inform "BC "Zenit" LLC about any change in personal data (last name, first name, middle name, registration or residence address, phone, mobile phone, admission to educational institution, receiving (completing) education (additional education), child birth, change of marital status, etc.).

11.3 The employee has the right to:

11.3.1 Receive complete information about his personal data and their processing.

11.3.2 Have free access to his personal data, including the right to receive a copy of any record containing his personal data, except as otherwise provided by law.

11.3.3 Demand exclusion or correction of incorrect or incomplete personal data by submitting to "BC "Zenit" LLC a written statement accompanied by documents confirming the correctness of personal data.

11.4 The party to the contractual relations shall:

11.4.1 Provide " BC "Zenith" LLC with complete and reliable personal data in order to properly perform the contractual obligations.

11.4.2 When necessary to make changes to personal data, provide supporting documents.

11.5 Other personal data owners have the right to:

11.5.1 Receive, following the request of the personal data owner or his legal representative, information on processing of their personal data to the extent established by applicable law.

11.5.2 The request must contain the number of the main document proving the identity of the personal data owner or his representative, information on the date of issuance of the said document and the authority that issued it, information confirming the existence of relations between the personal data owner and the operator (contract number, date of conclusion, keyword and (or) other information), or information that otherwise confirms the fact that the operator processed personal data, signature of the personal data owner or his representative. The request may be sent in the form of an electronic document and signed by electronic signature in accordance with the legislation of the Russian Federation.

11.5.3 Personal data owner has the right to require "BC "Zenit" LLC to clarify his personal data on the basis of supporting documents, to block them or to destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, and also take measures prescribed by law to protect his rights.

11.5.4 Depending on the content of the request the response to the personal data owner shall be prepared as per a standard form (Appendix 5 or 6).

11.5.5 The fact of destruction of personal data shall be recorded in the Act of destruction (Appendix 3).

12. Responsibilities of “BC “Zenit” LLC employees in personal data processing within their job duties

12.1 The employees of "BC "Zenit" LLC, who process personal data during the performance of their job duties, are required to comply with the requirements of this Policy and other internal regulatory documents governing personal data processing at "BC "Zenit" LLC.

12.2 HR Manager must keep HR accounting documents containing personal data of employees in accordance with the requirements of the law and allow no familiarization with the personal data by unauthorized persons.

12.3 Employees must use personal data that became known to them during the performance of their job duties solely for the purpose of fulfilling their duties.

12.4 Employees are prohibited from distributing, disclosing, or making available to third parties personal data that became known to them during their work at “BC "Zenit” LLC, unless provided by law, or when this is due to the established personal data processing technology.

13. Liability for personal data protection

13.1 For violation of the personal data processing rules, their unlawful disclosure or distribution, the liable persons are subject to disciplinary, administrative, civil or criminal liability in accordance with the applicable law.

Standard Form of Consent of a Personal Data Owner for Acquiring his Personal Data from Third Parties

I, _____
(Full name of the Owner)

Registered at the address:

(Registration address of the Owner)

RF Passport Series _____ No. _____ issued _____
(series, number, issuing authority, date of issue)

in accordance with Federal Law No. 152-ФЗ "On Personal Data" dated 07/27/2006 I agree to receiving by "BC "Zenit", registered at: 5 Galernaya Street, St. Petersburg, Russian Federation, from third parties

(Full name or Third-party name)

of the following information:

(List of requested information, documentation and other data)

« _____ » _____ 20_____
(signature, name)

Standard Form of Employee's Written Consent for Personal Data Processing

Name of operator receiving consent:

«BC «Zenit» LLC

Operator's Address: 190000, Saint-Petersburg, Ul.

Galernaya, 5

Mailin Address: 197110, Saint-Petersburg, Football Alley,

8, Entrance 26

Full name of the Personal Data Owner:

Registration address:

Passport: Series. No.

(issued by)

(issue date)

CONSENT TO PROCESSING OF PERSONAL DATA

I hereby grant to the Employer - the "Zenit Basketball Club" Limited Liability Company (hereinafter - "BC "Zenit" LLC) – the right to process, both using computer equipment and without using it (including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction) of my personal data, containing in particular: surname, name, middle name, year, month, date and place of birth, gender, marital status, education, profession, identity document data, data on registration and actual place of residence, photo, tax identification number, information about income, education, employment, place of work and position, military duty, citizenship, state of health, biometric data, contact details (mobile phone number; home phone number; E-mail), information on numbers, series and other data of the state pension insurance certificate, certificate of taxpayer identification number, marriage/divorce certificate, birth certificate, diplomas and other educational documents, medical insurance policies, other similar documents, as well as other information (related to the category of personal data), with the exception of personal data relating to race and nationality, political views, religious or philosophical beliefs, intimate life.

This right is granted for:

1. Organization and execution of voluntary medical and other types of insurance.
2. State co-financing of pensions.
3. Issuance of salary cards in financial and credit institutions and organizations.
4. Registration of entries required for business trips letters of assignment.
5. Booking and registration of travel documents and hotels.
6. Paperwork according to requirements of RBF and VTB United League.
7. Audit of financial statements prepared in accordance with the rules applicable in the Russian Federation and consolidated financial statements prepared in accordance with the International Financial Reporting Standards.

8. Checks of compliance with information on the pension rights of the insured by the Pension Fund of the Russian Federation.
9. Determination of fitness for work, prevention of occupational diseases and sport injuries in accordance with the provisions of Art. 348.3 of the Labor Code of the Russian Federation

I agree to the transfer, including cross-border, of my personal data to third parties in the amount necessary to achieve the above objectives.

I agree that my personal data containing photo, surname, first name, middle name, company name, structural unit of the company, position, location of permanent workplace, work phone/fax numbers, corporate email address, day and month of birth, are publicly available within "BC "Zenit" LLC to ensure production activities and placement on the corporate portal.

The rights mentioned above and consent to processing of my personal data are granted to the operator for the duration of my work with "BC "Zenit" LLC, with the exception of the right to process personal data for state and non-state pension provision, audit of financial statements prepared in accordance with the current rules of the Russian Federation and consolidated financial statements prepared in accordance with the International Financial Reporting Standards, which is of unlimited duration, as well as with the exception of the right to personal data processing in order to provide social benefits and guarantees stipulated by local regulations of "BC "Zenit" LLC, which is granted for the duration of these benefits and guarantees.

This consent is valid from the date of its signing by Personal Data Owner.

The revocation of this consent can be performed at any time on the basis of a written statement of the Personal Data Owner.

Date _____

Signature of the Personal Data Owner _____ (_____)
Full name

**Personal Data Destruction Act
(Standard Form)**

Commission empowered by Order No. _____ dated _____

Composed of:

Chairman –

Members –

selected the personal data carriers and found that in accordance with the requirements of the guidelines for information protection _____, the information recorded on them while in operation is subject to guaranteed destruction:

Item	Date	Carrier type	Registration number of the personal data carrier	Note

Total removable carriers _____
(in numbers and in words)

On these carriers, personal data has been destroyed by

(erasing using guaranteed data destruction device, mechanical destruction, etc.)

The listed personal data carriers have been destroyed by

(cutting, burning, mechanical destruction, etc.)

Chairman of the Commission: _____ / _____ /
Members of the Commission: _____ / _____ /
_____ / _____ /
_____ / _____ /

Standard Form of Response to the Personal Data Owner about Processed Personal Data

Dear _____!
(Name and middle name of the data owner)

In response to your request, we inform you.
On the basis of

"BC "Zenit" LLC, registered at: 5, Galernaya street, St. Petersburg, Russian Federation,
processes the following information containing your personal data:

Details of information, documentation and other data

The specified information is processed and used in order to:

« ___ » _____ 20__ .

(signature, name)

Standard Form of Response to a Personal Data Owner about Exclusion from Processing and Destruction, Correction of Incorrect Personal Data, as well as Data Processed in Violation of the Requirements of the Law

Dear _____ **!**
(Name, Middle name)

In response to your request, we inform you.
On the basis of

"BC "Zenit" LLC, registered at: 5, Galernaya street, St. Petersburg, Russian Federation, has excluded from processing and destroyed/corrected the following information containing your personal data:

Details of information, documentation and other data

« ____ » _____ 20__ .

(signature, name)