

**REGULATION (POLICY)
ON THE PROCESSING OF PERSONAL DATA
EMPLOYEES OF PAYPAL RUSSIA
Effective Date: May 10, 2022**

1. General Provisions

1.1. This Regulation has been developed on the basis of the Global Privacy Policy regarding personal data of employees and executors under a civil law contracts of PayPal Group of companies and in accordance with the legislation of the Russian Federation, including the Labor Code of the Russian Federation, the Federal law dated June 27, 2006 No. 152-FZ "On Personal Data".

1.2. This Regulation defines the goals, principles, procedure and conditions for processing personal data of employees of PayPal Russia (hereinafter referred to as the "Company"), measures to ensure their protection, the rights and obligations of personal data subjects.

1.3. This Regulation applies to all structural divisions, branches and representative offices of the Company.

2. Definitions

2.1. For the purposes of this Regulation, the following definitions are used:

employee - an individual who has entered into an employment relationship with the Company;

personal data - any information relating directly or indirectly to a specific or identifiable natural person (subject of personal data);

subjects of personal data – employees, executors under a civil law contracts;

processing of personal data - any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;

automated processing of personal data - processing of personal data using computer technology;

dissemination of personal data - actions aimed at disclosing personal data to an indefinite circle of persons;

provision of personal data - actions aimed at disclosing personal data to a certain person or a certain circle of persons;

blocking of personal data - temporary suspension of the processing of personal data (unless the processing is necessary to clarify personal data);

destruction of personal data - actions, as a result of which it becomes impossible to restore the content of personal data in the information system of personal data and (or) as a result of which material carriers of personal data are destroyed;

depersonalization of personal data - actions as a result of which it becomes impossible to determine the ownership of personal data by a specific subject of personal data without the use of additional information;

personal data information system - a set of personal data contained in databases and information technologies and technical means that ensure their processing;

cross-border transfer of personal data - transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity;

confidentiality of personal data - mandatory requirement for the Company not to disclose to third parties and not to distribute personal data without the consent of the subject of personal data or other legal grounds.

3. Rights and obligations of personal data subjects

3.1. Subjects of personal data have the right to:

- 1) full information about their personal data processed by the Company;
- 2) access to their personal data, including the right to receive a copy of any record containing personal data, except as otherwise provided by the legislation of the Russian Federation;
- 3) clarification of their personal data, their blocking or destruction if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;
- 4) supplementing your personal data of an evaluative nature with a statement expressing your own point of view;
- 5) notifying all persons who were previously informed of their incorrect or incomplete personal data of all corrections or additions made to them;
- 6) withdrawal of consent to the processing of their personal data;
- 7) appeal in accordance with the legislation of the Russian Federation of actions (inaction) of the Company in the processing of personal data;
- 8) unlimited access to documents regulating the processing by the Company of personal data of personal data subjects;
- 9) exercising other rights provided for by the legislation of the Russian Federation and these Regulations.

3.2. Subjects of personal data are obliged to:

- 1) provide the Company with their personal data in accordance with the legislation of the Russian Federation and these Regulations;
- 2) timely inform the Company about changes in their personal data;
- 3) ensure the confidentiality of personal data of other personal data subjects in accordance with the requirements of the legislation of the Russian Federation and local regulations of the Company;
- 4) perform other actions and comply with other requirements stipulated by the legislation of the Russian Federation and local regulations of the Company.

4. Rights and obligations of the personal data operator

4.1. The company is an operator, that is, a legal entity, independently and (or) jointly with other

persons organizing and (or) processing personal data of personal data subjects.

4.2. With regard to the processing of personal data, the Company has the rights granted to it in accordance with the legislation of the Russian Federation, as well as these Regulations.

4.3. The Company is obliged to take the following necessary and sufficient measures to fulfill the obligations of the operator provided for by the legislation of the Russian Federation:

- 1) appoint a person responsible for organizing the processing of personal data;
- 2) issue documents defining the Company's policy regarding the processing of personal data, local regulations on the processing of personal data, as well as local regulations establishing procedures aimed at preventing and detecting violations of the legislation of the Russian Federation regarding the processing of personal data and eliminating the consequences of such violations;
- 3) apply legal, organizational and technical measures to protect personal data of personal data subjects from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution, as well as from other illegal actions;
- 4) explain to the subjects of personal data the legal consequences of a refusal to provide their personal data, if the provision of personal data is mandatory in accordance with the legislation of the Russian Federation;
- 5) block illegally processed personal data, stop processing personal data in accordance with the legislation of the Russian Federation;
- 6) notify the subjects of personal data about the elimination of violations committed in the processing of their personal data;
- 7) provide personal data subjects at their request or their representatives with information regarding the processing of their personal data in the manner prescribed by the legislation of the Russian Federation and local regulations of the Company;
- 8) perform other actions and comply with other requirements stipulated by the legislation of the Russian Federation and local regulations of the Company.

5. Legal grounds and purposes of personal data processing

5.1. The processing of personal data of personal data subjects is carried out in compliance with the rules provided for by the legislation of the Russian Federation and this Regulation, and is allowed in the following cases:

- 1) the processing of personal data is carried out with the consent of the subject of personal data to the processing of his personal data;
- 2) the processing of personal data is necessary to achieve the goals stipulated by an international treaty of the Russian Federation or the legislation of the Russian Federation, to exercise and fulfill the functions, powers and obligations assigned to the operator by the legislation of the Russian Federation;
- 3) the processing of personal data is necessary for the execution of a judicial act, an act of another body or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;
- 4) the processing of personal data is necessary for the performance of an agreement to which the subject of personal data is a party or beneficiary or guarantor, as well as to conclude an agreement on the initiative of the subject of personal data or an agreement under which the subject of personal

data will be the beneficiary or guarantor;

5) the processing of personal data is necessary to protect the life, health or other vital interests of the subject of personal data, if obtaining the consent of the subject of personal data is impossible;

6) the processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator or third parties.

5.2. The processing of personal data of personal data subjects is carried out in order to ensure compliance with the legislation of the Russian Federation, ensure the implementation of the Company's activities provided for by the constituent documents, and specific business processes of the Company, assist employees in finding employment, receive education and promotion, ensure the personal safety of employees, control the number and the quality of the work performed and ensuring the safety of the Company's property, namely:

- 1) to administer the general interaction of personal data subjects with the Company;
- 2) to resolve issues related to disciplinary sanctions, complaints about violations of labor rights;
- 3) to resolve issues related to the provision of leave or absence from the workplace;
- 4) to resolve issues related to providing access to the Company's facilities, equipment and systems;
- 5) to ensure the safety of assets, property, facilities of the Company, to ensure the provision of a safe working environment;
- 6) to manage, evaluate and make decisions about job responsibilities and performance of personal data subjects;
- 7) to manage travel and reimbursement, transfers and relocations;
- 8) to conduct internal investigations on a potential violation of the legislation of the Russian Federation and local regulations of the Company, to prevent fraud;
- 9) to comply with the requirements of the legislation of the Russian Federation, including the calculation and payment of mandatory taxes, contributions, deductions, mandatory social and pension insurance of personal data subjects, when transferring personal data of personal data subjects to state bodies of the Russian Federation;
- 10) to substantiate and challenge claims;
- 11) to track the use of personal data by subjects information and communication systems to ensure compliance with the information security of the Company, the policies and regulations of the Company on the processing of personal data, as well as other local regulations of the Company, policies and procedures of PayPal Group of companies;
- 12) to inform potential buyers, professional advisers of the buyer in connection with the sale, disposal or transfer of all or part of the Company's business;
- 13) to ensure network and information security, including preventing unauthorized access to the Company's electronic communications systems, as well as preventing the spread of malicious software;
- 14) to ensure the health and safety of personal data subjects at the workplace, to assess

suitability for work, to ensure appropriate conditions at the workplace, to provide benefits in accordance with the legislation of the Russian Federation and local regulations of the Company;

- 15) to manage benefit plans provided in accordance with the local regulations of the Company;
- 16) to analyze and ensure socio-cultural diversity and take into account the individual characteristics of the Company's employees, consider relevant initiatives and analytical conclusions;
- 17) to ensure equal rights and opportunities;
- 18) to process compensation and rewards;
- 19) to provide personal data subjects with the benefits provided by the Company, including option programs, insurance, financial and health programs, other benefits and benefits, including temporary disability benefits and maternity benefits;
- 20) to make contributions to compulsory pension insurance;
- 21) to provide support for volunteer programs and other similar groups of personal data subjects sponsored by the Company;
- 22) to identify new professional opportunities and promote personal data subjects in the Company;
- 23) to analyze and better understand the Company's retention and attrition rates;
- 24) to ensure the work of the trade union within its powers granted by the legislation of the Russian Federation, in the event that it is created in the Company.

6. Categories of personal data subjects, the composition of the processed personal data

6.1. The categories of personal data subjects whose personal data are processed in accordance with this Regulation include employees of the Company.

6.2. Composition of personal data of personal data subjects processed by the Company:

- surname, name, patronymic (including previous surnames, first names and (or) patronymics in case of their change), preferred name;
- contact information (address of registration at the place of residence (place of stay), address of actual residence, e-mail address);
- type, series, number of the main identity document, information about the date of issue of the said document and the authority that issued it;
- information about the insurance number of an individual personal account (SNILS), taxpayer identification number (TIN);
- information about labor activity;
- information about the address of the place of work, wages, annual holidays and benefits;
- information about education;
- information about background checks, including credit checks, criminal records and related information;
- tax information related to the employment of the subject of personal data;
- payment information;
- PayPal account , credit and debit card information;
- employment-related information (including employment eligibility documentation, references, and other information included in a resume or cover letter);
- date of termination of employment and grounds for termination;

- results of employment status check;
- information about membership in public associations or trade union activities;
- age;
- gender;
- national, racial, ethnicity;
- disability information;
- the status of a guardian or custodian;
- marital status;
- parental and pregnancy status;
- military and/or veteran status;
- health data, including any medical conditions, health and disease records, information related to vaccinations or immunity from infectious diseases;
- citizenship;
- information about the status of sexual self-determination;
- PayPal websites, applications, devices or other digital objects, emails sent and received;
- geolocation data;
- information regarding the subject of personal data contained in social networks;
- photos and videos;
- call records (meetings/customer service);
- information about fraud and risk assessment;
- information on the compliance of the subject of personal data with the assigned work and the potential for its development;
- other personal data necessary to ensure the implementation of the processing purposes specified in paragraph 5 of this Regulation.

7. Principles and procedure for processing personal data

7.1. The processing of personal data by the Company is carried out in accordance with the following principles:

- 1) the processing of personal data must be carried out on a lawful and fair basis;
- 2) the processing of personal data should be limited to the achievement of specific, predetermined and legitimate purposes, processing of personal data that is incompatible with the purposes of collecting personal data is not allowed;
- 3) it is not allowed to combine databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other;
- 4) only those personal data that meet the purposes of their processing are subject to processing;
- 5) the content and scope of the processed personal data must correspond to the stated purposes of processing; processed personal data should not be excessive in relation to the stated purposes of their processing;
- 6) when processing personal data, the accuracy of personal data, their sufficiency, and, if necessary, relevance in relation to the purposes of processing personal data, must be ensured, while the Company must take the necessary measures or ensure their adoption to remove or clarify incomplete or inaccurate data;
- 7) storage of personal data should be carried out in a form that allows determining the subject of personal data, no longer than required by the purposes of processing personal data, if the period for storing personal data is not established by the legislation of the Russian Federation, an agreement to which the subject is a party, beneficiary or guarantor personal data;

8) processed personal data is subject to destruction or depersonalization upon achievement of the purposes of processing or in case of loss of the need to achieve these purposes, unless otherwise provided by the legislation of the Russian Federation.

7.2. When hiring, an authorized employee of the Company receives from the subject of personal data consent to the processing of his personal data.

7.3. In cases provided for by the legislation of the Russian Federation, when the processing of personal data of the subject of personal data is carried out only with his consent, an authorized employee of the Company receives from the subject of personal data consent to the processing of his personal data.

7.4. The authorized employee of the Company obtains consent to the processing of personal data from the subject of personal data prior to their processing.

7.5. Consent to the processing of personal data of personal data subjects is stored in their personal files.

7.6. The subject of personal data has the right to withdraw consent to the processing of personal data by sending a response to the Company, drawn up in any form.

7.7. If the subject of personal data withdraws consent to the processing of personal data, the Company has the right to continue processing personal data without the consent of the subject of personal data if there are grounds provided for by the legislation of the Russian Federation.

7.8. The source of information about all personal data of the subject of personal data in accordance with this Regulation is directly the subject of personal data. If personal data can only be obtained from a third party, then the subject of personal data must be notified in writing in advance about this and written consent must be obtained from him. The company is obliged to inform the subject of personal data about the purposes, intended sources and methods of obtaining personal data, as well as the nature of the personal data to be obtained and the consequences of the refusal of the subject of personal data to give written consent to receive them.

The need for consent to receive personal data from third parties and send a notification about this may arise, for example, when confirming the fact of obtaining a diploma, certificate, certificate of education, when restoring a work book, certificate of qualification, when confirming the fact of working in a particular place, the fact of changing the surname, including if the loss of information occurred due to natural disasters, other circumstances.

The Company is not entitled to request from third parties, even with the consent of the subject of personal data, information that is not related to the purposes of processing personal data.

7.9. The Company does not have the right to receive and process the personal data of the subject of personal data that, in accordance with the legislation of the Russian Federation, belong to special categories of personal data or are related, in accordance with the legislation of the Russian Federation, to biometric data, except as provided by the legislation of the Russian Federation, as well as cases, when the subject of personal data has agreed in writing to the processing of his personal data relating to special categories of personal data or related to biometric data.

7.10. The Company does not have the right to receive and process the personal data of the subject of personal data about his membership in public associations or his trade union activities, except as provided by the legislation of the Russian Federation, as well as in cases where the subject of personal data has consented in writing to the processing of such personal data.

7.11. Processing of personal data of the subject of personal data by the Company is possible only with the consent of the subject of personal data, with the exception of cases provided for by the legislation of the Russian Federation, when such consent is not required.

7.12. The written consent of the employee to the processing of his personal data must include, in particular, the information provided for by the legislation of the Russian Federation.

7.13. In accordance with Article 86 of the Labor Code of the Russian Federation, in order to ensure the rights and freedoms of man and citizen, the Company, when processing personal data of personal data subjects, must comply, in particular, with the following requirements:

- when making decisions affecting the interests of the subject of personal data, the Company does not have the right to rely on personal data obtained solely as a result of their automated processing or electronic receipt;
- protection of personal data of the subject of personal data from their unlawful use, loss is provided by the employer at his expense in the manner established by the legislation of the Russian Federation;
- subjects of personal data must be familiarized against receipt with the documents of the Company establishing the procedure for processing personal data, as well as their rights and obligations in this area;
- employees should not waive their rights to maintain and protect secrets;
- the Company and the subjects of personal data should jointly develop measures to protect the personal data of employees.

7.14. The Company has the right to entrust the processing of personal data of personal data subjects with their consent to another person on the basis of an agreement concluded with him. The contract must contain a list of actions (operations) with personal data, the purposes of processing, the obligation of a person to maintain the confidentiality of personal data and ensure the security of personal data during their processing, as well as requirements for the protection of processed personal data.

7.15. The transfer of personal data of personal data subjects without their consent is allowed if it is necessary for the execution of a judicial act, an act of another body or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings, at the motivated requests of law enforcement agencies and other state authorities within the framework of established powers, as well as in other cases provided for by federal laws.

7.16. The transfer of personal data of personal data subjects to third parties is carried out with their written consent, except when it is necessary in order to prevent a threat to the life and health of personal data subjects, as well as in other cases provided for by the legislation of the Russian Federation.

The Company requests consent from personal data subjects using a separate consent form to transfer personal data to the following third parties and entrusted parties found [here](#).

The transfer of personal data to third parties is carried out only after receiving from the third party documents confirming the fulfillment of the conditions for maintaining confidentiality and ensuring the security of personal data during their processing.

7.17. Cross-border transfer of personal data of personal data subjects on the territory of foreign states that are parties to the Council of Europe Convention for the Protection of Individuals with Regard to Automatic Processing of Personal Data, as well as other foreign states that provide adequate protection of the rights of personal data subjects, the list of which is approved by the authorized body for the protection of the rights of subjects personal data is carried out in accordance with the legislation of the Russian Federation.

7.18. Cross-border transfer of personal data on the territory of foreign states that do not provide

adequate protection of the rights of personal data subjects may be carried out in the following cases:

- 1) the consent in writing of the subject of personal data to the cross-border transfer of his personal data;
- 2) provided for by international treaties of the Russian Federation;
- 3) provided for by the legislation of the Russian Federation, if necessary in order to protect the foundations of the constitutional order of the Russian Federation, ensure the defense of the country and the security of the state, as well as ensure the stable and safe functioning of the transport complex, protect the interests of the individual, society and the state in the field of the transport complex from acts of illegal intervention;
- 4) execution of an agreement to which the subject of personal data is a party;
- 5) protection of life, health, other vital interests of the subject of personal data or other persons if it is impossible to obtain consent in writing from the subject of personal data.

7.19. The condition for terminating the processing of personal data may be the achievement of the purposes of processing personal data, the expiration of the consent or withdrawal of the consent of the subject of personal data to the processing of his personal data, as well as the identification of unlawful processing of personal data.

7.20. The storage of personal data should be carried out in a form that allows determining the subject of personal data, no longer than required by the purposes of processing personal data, unless the period for storing personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor.

When storing personal data, the personal data operator is obliged to use databases located on the territory of the Russian Federation.

The processed personal data is subject to destruction or depersonalization upon reaching the goals of processing or in case of loss of the need to achieve these goals, unless otherwise provided by the legislation of the Russian Federation. When storing documents containing personal data of employees, one should take into account the storage periods established, in particular, in Art. 22.1 of the Federal Law of October 22, 2004 No. 125-FZ "On Archiving in the Russian Federation" and the List of typical administrative archival documents generated in the course of the activities of state bodies, local governments and organizations, indicating the periods of their storage (approved by the Order of the Federal Archives of 20.12.2019 No. 236).

8. Measures to ensure the security of personal data during their processing

8.1. The Company takes the following technical and organizational measures to ensure the security and confidentiality of personal data:

- 1) determination of threats to the security of personal data during their processing in information systems of personal data;
- 2) the use of information security tools that have passed the conformity assessment procedure in accordance with the established procedure;
- 3) evaluation of the effectiveness of the measures taken to ensure the security of personal data prior to the commissioning of the personal data information system;
- 4) accounting of machine carriers of personal data;
- 5) detection of facts of unauthorized access to personal data and taking measures, including measures

to detect, prevent and eliminate the consequences of computer attacks on personal data information systems and to respond to computer incidents in them;

6) recovery of personal data modified or destroyed due to unauthorized access to them;

7) establishing rules for access to personal data processed in the personal data information system, as well as ensuring the registration and accounting of all actions performed with personal data in the personal data information system;

8) control over the measures taken to ensure the security of personal data and the level of security of personal data information systems.

9. Update, correction, deletion and destruction of personal data

9.1. If, upon contacting the subject of personal data or the authorized body for the protection of the rights of subjects of personal data, inaccurate personal data or illegal processing of personal data is revealed, the Company is obliged to block such personal data from the moment of application for the period of verification.

When confirming the fact of inaccuracy of personal data, the Company is obliged to clarify personal data within 7 working days from the date of submission of such information and remove the blocking of personal data.

If unlawful processing of personal data is revealed, the Company is obliged to stop processing them within a period not exceeding 3 working days from the date of detection. If it is impossible to ensure the legality of the processing of personal data, the Company is obliged to destroy such personal data within a period not exceeding 10 working days from the date of detection of illegal processing of personal data.

9.2. If the purpose of processing personal data is achieved, the Company is obliged to stop processing personal data or ensure its termination (if the processing of personal data is carried out by another person acting on behalf of the operator) and destroy personal data or ensure their destruction (if the processing of personal data is carried out by another person acting on behalf of the operator). on behalf of the operator) within a period not exceeding 30 days from the date of achievement of the purpose of processing personal data.

9.3. In the event that the subject of personal data withdraws consent to the processing of his personal data, the Company is obliged to stop processing them or ensure the termination of such processing (if the processing of personal data is carried out by another person acting on behalf of the operator) and if the storage of personal data is no longer required for the purposes of processing personal data, destroy personal data or ensure their destruction (if the processing of personal data is carried out by another person acting on behalf of the operator) within a period not exceeding 30 days from the date of receipt of the said withdrawal.

10. Sending requests to the Company by the subject of personal data

10.1. In the event of any questions and requests regarding this Regulation, the subject of personal data may contact the Company in any form at the e-mail address globalprivacy@paypal.com or by sending a written request to the address of the Company.