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STANDARD POLICY
for processing of personal data
in Rosatom Central and Southern Africa (Pty) LTD

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1. Purpose and scope

1.1. A standard policy for processing of personal data in the foreign regional center of the State Corporation ROSATOM (hereinafter referred to as the Policy) defines the basic principles, goals, conditions and methods for processing of personal data, lists of subjects and personal data processed by Rosatom Central and Southern Africa (Pty) Ltd (hereinafter referred to as RC), RC's obligations in respect of the processing of personal data, the rights of data subjects, as well as the requirements for personal data protection implemented in the RC.

1.2. The policy was developed taking into account the requirements of the Protection of Personal Information Act, No. 4 of 2013 (hereinafter referred to as "POPI Act"), and legislative and other regulatory legal acts of the Republic of South Africa.

1.3. The provisions of the Policy provide the basis for the development of local regulations governing processing of personal data of RC employees and other data subjects.

2. Terms and Definitions

Term	Definition
Automated processing of personal data	processing of personal data using a computer engineering means or any other equipment capable of operating automatically in response to instructions given for the purpose of processing information
Blocking of personal data	temporary cessation of processing of personal data (unless processing is necessary to clarify personal data)
data subject	the person to whom personal data relates
Personal data Information System	set of personal data contained in databases and processing technologies and technical means ensuring their processing
Information	information (messages, data) regardless of form of their presentation.
Depersonalization of personal data	actions, as a result of which it becomes impossible, without using additional information, to determine the ownership of personal data to a specific data subject
Processing of personal data	any action (operation) or set of actions (operations) performed using automation means or without using such means for processing of personal data, including: <ul style="list-style-type: none"> (i) the collection, receipt, recording, organization, collation, storage, updating or modification, retrieval, alteration, consultation or use; (ii) dissemination by means of transmission, distribution or making available in any other form; or

	(iii) merging, linking, as well as restriction, degradation, erasure, depersonalization, or destruction of personal data
Responsible Party	state body, municipal body, legal or natural person, independently or with other persons organizing and (or) processing personal data, as well as determining the purposes of processing of personal data, the composition of personal data to be processed, actions (operations) performed with personal data
Personal data	any information relating directly or indirectly to a determined or designated living natural person and where it is applicable, an identifiable existing juristic person
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 the material carriers of personal data are destroyed or deleted

3. Principles and objectives for processing personal data

- 3.1. RC, being a Responsible Party of personal data, processes personal data of RC employees and other Data Subjects who are not employed by RC.
- 3.2. RC is obliged to comply with the POPI Act which requires RC to inform its data subject as to the manner in which their personal data is used, disclosed and destroyed.
- 3.3 The processing of personal data in the RC is carried out taking into account the need to ensure the protection of the rights and freedoms of employees of the RC and other Data Subjects, including the protection of the right to personal and family privacy, based on the following principles:
 - 3.3.1 processing of personal data is carried out in the RC on a lawful and fair basis;
 - 3.3.2 processing of personal data is limited to the achievement of specific, predetermined and legitimate goals;
 - 3.3.3 processing of personal data that is incompatible with the purposes of collecting personal data is not allowed;
 - 3.3.4 personal data may only be processed if, given the purpose for which it is processed, it is adequate, relevant and not excessive;
 - 3.3.4 database integration that contains personal data that is processed for purposes incompatible with each other is not allowed;
 - 3.3.5 personal data may only be processed that meets the purposes of their processing;

- 3.3.6 the content and volume of processed personal data is consistent with the stated processing objectives. The redundancy of the processed personal data in relation to the stated purposes of their processing is not allowed;
- 3.3.7 the Responsible Party must take reasonably practicable steps to ensure the accuracy and completeness of personal data, and that is not misleading and updated where necessary, and, if necessary, relevance in relation to the purposes of processing of personal data. The RC is taking necessary measures to remove or clarify incomplete or inaccurate personal data;
- 3.3.8 records of personal data are stored for no longer than is necessary for achieving the purpose for which the information was collected or subsequently processed, unless retention of the record is required or authorised by law; the Responsible Party reasonably requires the record for lawful purposes related to its functions or activities; retention of the record is required by a contract between the parties thereto; the data subject or a competent person where the data subject is a child has consented to the retention of the record; or as otherwise provided by the POPI Act.
- 3.4 The processed personal data is destroyed or depersonalized upon the achievement of the processing objectives or in the event that there is no longer a need to achieve these objectives, unless otherwise provided by applicable law.
- 3.5. Personal data is processed in the RC in order to:
 - 3.5.1 ensure compliance with local regulations of the State Corporation Rosatom and the RC;
 - 3.5.2 disclose personal data to state authorities, the *Pension Fund*, the *Social Insurance Fund*, the *Federal Medical Insurance Fund*, as well as other state bodies, if required by law;
 - 3.5.3 regulate labour relations with RC employees (employment assistance, training and promotion, ensuring personal safety, monitoring the quantity and quality of work performed, ensuring the safety of property);
 - 3.5.4 provide additional guarantees and compensations to employees of RC and members of their families, including non-state pension coverage, voluntary medical insurance, medical care and other types of social security;
 - 3.5.5 protect the life, health or other vital interests of Data Subjects;
 - 3.5.6 prepare the conclusion, execution and termination of contracts with counterparties;
 - 3.5.7 ensure access and internal security policy at RC facilities;
 - 3.5.8 form reference materials for the internal information support of RC activity, production branches and representative offices;
 - 3.5.9 execute judicial acts, acts of other bodies or officials subject to execution in accordance with the legislation of the Republic of South Africa about enforcement proceedings;

3.5.10 implement rights and legitimate interests of RC in the framework of the implementation of activities stipulated by the Charter and other local regulatory acts of RC, or third parties, or the achievement of socially significant goals.

4. The list of subjects whose personal data are processed in RC

RC processes the personal data of the following Data Subject:

- 4.1 RC workers; and
- 4.2 other Data Subjects (to ensure the implementation of the processing objectives specified in section 5 of the Policy).

5. List of personal data processed in RC

- 5.1. The list of personal data processed in RC is determined in accordance with the legislation of the Republic of South Africa, local regulatory acts of the State Atomic Energy Corporation ROSATOM and the RC based on the purposes of processing personal data specified in section 4 of the Policy.
- 5.2. Special personal information relating to ethnicity, nationality, political views, religious or philosophical beliefs, intimate life are not processed in the RC.

6. RC functions for processing of personal data

6.1 In processing personal data, RC shall:

- 6.1.1 take necessary and sufficient measures to ensure compliance with the requirements of South African legislation and local regulatory acts of RC in the field of processing of personal data;
- 6.1.2 take legal, organizational and technical measures to protect personal data from unlawful or accidental access, destruction, alteration, blocking, copying, provision, disclosing of personal data, as well as from other illegal actions in relation to personal data;
- 6.1.3 appoints the person responsible for organizing the processing of personal data in RC;
- 6.1.4 publishes local regulations defining policies and issues of processing and protection of personal data in the RC;
- 6.1.5 educate employees of the RC regarding the processing of personal data in accordance with the provisions of the POPI Act, local regulations of ROSATOM and RC in the field of personal data, including requirements for the protection of personal data, and training of its employees;
- 6.1.6 publish or otherwise provide unrestricted access to this Policy;
- 6.1.7 inform the Data Subjects or their representatives about the availability of personal data related to the relevant subjects in prescribed manner, provide an opportunity to familiarize themselves with this personal data when accessing and (or) receiving requests from specified Data Subjects or their representatives, unless otherwise provided by the POPI Act;

- 6.1.8 stop processing and destroy personal data as provided in the POPI Act; and
- 6.1.9 perform other actions stipulated by the POPI Act.

7. Conditions for processing of personal data in RC

- 7.1. RC shall only be entitled to process personal data with the consent of the Data Subject or a competent person where the data subject is a child to the processing of his personal data, unless otherwise provided by the POPI Act;
- 7.2. RC shall not disclose personal data to third parties and shall not distribute personal data without the consent of the data subject, unless otherwise provided by applicable legislation; or to satisfy an order of a court of competent jurisdiction.
- 7.3. RC is entitled to entrust the processing of personal data on the basis of a contract concluded with person. The contract should contain a list of actions (operations) with personal data that will be performed by the person that performs processing of personal data, processing purposes, the obligation of such person to maintain the confidentiality of personal data and for ensuring the safety of personal data during its processing, as well as requirements for the protection of personal data being processed.
- 7.4. For the purpose of internal information support, RC may create internal reference materials, which, with the written consent of the Data Subject, unless otherwise provided by the POPI Act, may include his full name, place of work, position, year and place of birth, address, telephone line number, E-mail, and other personal data reported by the Data Subject.
- 7.5. Access to personal data processed in RC is allowed only to employees of RC holding positions included in the list of RC posts, which are replaced when personal data are processed.

8. The list of actions with personal data and methods for its processing

- 8.1. RC collects, records, organizes, stores, refines (updates, changes), retrieves, uses, transfers (distributes, provides, accesses), remodels, blocks, deletes and destroys personal data.
- 8.2. Processing of personal data in RC is carried out in the following ways:
 - 8.2.1 manual processing of personal data;
 - 8.2.2 automated processing of personal data with or without transferring the information received through Internet and telecommunication networks; and
 - 8.2.3 mixed processing of personal data.

9. Rights of personal data subjects

- 9.1. Data Subjects are entitled to:
 - 9.1.1 complete information about their personal data processed in RC;
 - 9.1.2 access their personal data, including the right to receive a copy of any record containing their personal data, except as required by the POPI Act, as well as

- access to relevant medical data with the help of a medical specialist of their choice;
- 9.1.3 clarification of their personal data, the blocking or destruction of their personal data if personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;
- 9.1.4 withdrawal of consent to the processing of personal data;
- 9.1.5 taking measures provided by law to protect their rights;
- 9.1.6 appeal against actions or omissions of the RC, carried out in violation of the requirements of the POPI Act, with the authorized body for protection of the rights of data subjects or in court
- 9.1.7 exercise other rights stipulated by the POPI Act.

10. Measures taken by RC to ensure the performance of Responsible Party duties for processing of personal data

- 10.1 Measures that are necessary and sufficient to ensure that RC fulfills the Responsible Party's duties as stipulated by the POPI Act include:
 - 10.1.1 appointment of a person responsible for organizing of processing of personal data in RC;
 - 10.1.2 adoption of local regulations and other documents in the field of processing protection of personal data;
 - 10.1.3 organization of training and conducting methodological work with employees of RC, who occupy positions included in the list of RC posts, during the period in which personal data is processed;
 - 10.1.4 obtaining the consent of data subjects for processing of their personal data, except as required by the POPI Act;
 - 10.1.5 separation of personal data processed without the use of automation, from other information, in particular, by fixing them on separate material carriers of personal data, in special sections;
 - 10.1.6 provision of separate storage of personal data and their material carriers, which are processed for different purposes and which contain different categories of personal data;
 - 10.1.7 imposing a ban on transfer of personal data through open communication channels, computer networks outside the controlled area and the Internet without applying measures to ensure the security of personal data (except publicly available and / or depersonalized personal data) established in the Republic of South Africa;
 - 10.1.8 storage of personal data material carriers in compliance with conditions that ensure the safety of personal data and exclude unauthorized access;
 - 10.1.9 internal control over the compliance of processing of personal data with the POPI Act, laws and regulations adopted in accordance with it, requirements for the protection of personal data, this Policy, local regulatory acts of RC;
 - 10.1.10 other measures stipulated by the POPI Act.

10.2. Measures to ensure the security of personal data when it is processed in personal data information systems are established in accordance with the industry requirements of the POPI Act.

11. Control of compliance with the POPI Act and local regulatory acts of RC in the field of personal data, including requirements for protection of personal data

- 11.1. Monitoring of compliance by employees of RC with the POPI Act and local regulatory acts of RC in the field of personal data, including requirements for the protection of personal data, is carried out to verify compliance of processing of personal data in RC with the POPI Act and local regulatory acts of the RC in the field of personal data, including requirements for the protection of personal data, as well as the adoption of measures aimed at preventing and detecting violations of the POPI Act, identifying possible channels of leakage and unauthorized access to personal data, eliminating the consequences of such violations.
- 11.2. Internal control over the compliance by RC employees with the POPI Act and local regulatory acts of RC in the field of personal data, including requirements for the protection of personal data, is carried out by the person responsible for organizing the processing of personal data in RC.
- 11.3. Internal control over the compliance of processing of personal data with the POPI Act and regulations adopted in accordance with it, requirements for the protection of personal data, this Policy, local regulatory acts of RC is carried out by the Asset Protection and Corporate Security Department of the Rosatom International Network private institution.
- 11.4. Personal responsibility for compliance with the POPI Act and local regulatory acts of RC in the field of personal data in RC, as well as for ensuring the confidentiality and security of personal data in RC, rests with the head of the RC.

