

PERSONAL DATA PROCESSING POLICY

Personal Data Processing Policy is intended to protect the rights and liberties of man and of the citizen while processing his/her personal data, including protection of rights to privacy, to a personal and family secret, and involves continuous analysis and improvement of the personal data processing system and processes, implementation of safe personal data processing measures based on the existing and applicable law, implementation of standards of international law, training and recurrent training of personnel directly engaged in and providing for processing of personal data insofar as it refers to confidentiality and security.

POLICY IMPLEMENTATION PRINCIPLES

Fundamental:

- Personal data is processed on a legal and equitable basis.
- Personal data processing is limited to achievement of particular, predefined and legitimate purposes. Personal data processing incompatible with personal data collection purposes is unallowable.
- It is not allowed to merge databases that contain personal data which is processed for incompatible purposes.
- Contents and volume of processed personal data are consistent with the stated data processing purposes. Processed personal data should not be redundant with respect to the stated purposes of processing such data.
- When processing personal data, it is required that such data should be accurate, sufficient and, if necessary, current with respect to the personal data processing purposes. "AirBridgeCargo Airlines" LLC takes appropriate actions (or causes such actions to be taken) to delete or to specify incomplete or inaccurate personal data.
- Storage and destruction of personal data are in compliance with the laws of the Russian Federation.
- "AirBridgeCargo Airlines" LLC does not disclose personal data to third parties, nor does it disseminate personal data without consent of the individual to whom such data belongs, unless otherwise provided by the applicable personal data law.
- "AirBridgeCargo Airlines" LLC provides necessary resources for successful implementation of safe personal data processing measures.

With respect to the Personnel:

- Personnel of "AirBridgeCargo Airlines" LLC are a key element in the personal data processing system.
- Each employee of "AirBridgeCargo Airlines" LLC participates in work on implementation of this Policy.
- Personnel's sincerity in ensuring security and confidentiality of personal data is appreciated. Any employee of "AirBridgeCargo Airlines" LLC may advise the person responsible for personal data processing of any violations connected with processing of personal data, without fear of any sanctions.

With respect to the Managers and Persons Responsible for Organizing Personal Data Processing:

- The manager of “AirBridgeCargo Airlines” LLC advocates the purposes and puts into practice the personal data processing culture in accordance with the requirements of the applicable laws and standards of international law.
- The manager of “AirBridgeCargo Airlines” LLC appoints an accountable person responsible for organizing personal data processing.
- The person responsible for organizing personal data processing makes decisions to prevent personal data processing violations, upon approval by the manager, organizes corrective actions and, if necessary, takes an active part in liaising with the government entities for those purposes.
- Investigation into violations of the personal data processing requirements is always conducted apart from other investigations. The purpose of the investigation is to identify the causes and to take timely corrective actions aimed at prevention of such incidents in the future.

With respect to the Customers, Suppliers and Partners:

- “AirBridgeCargo Airlines” LLC advocates safe processing of personal data, contributes to improvement of the level of confidence between the Customers, Suppliers and Partners.

General Director

S.A. Lazarev

