**OFFICIAL NOTICE ON PERSONAL DATA MANAGEMENT APPLICABLE TO DATA SUBJECTS RELATED TO NPP “HANHIKIVI-1” PROJECT**

Due to the fact that as of 25/05/2018 the new General Data Protection Regulation ( REGULATION 2016/679 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL dated 27/04/2016) shall be fully applicable, JSC “CONCERN TITAN-2” informs that it follows all applicable laws and regulations in the area of Private data protection and within the applicable scope of the above Regulation informs that following rules, practices and procedures are implemented in the organization.

**Relevant contact and regulatory Information.**

JSC “CONCERN TITAN-2” as the Controller for the purpose of the regulatory control has the official address at : 123112, Russian Federation, Moscow, Presnenskaya naberezhnaya 12, office III

The main establishment for the purpose of the regulatory control is : JSC “Concern Titan-2” branch in Finland , Energiakuja 3, 01580 , Helsinki.

The Personal data protection officer is Tuija Nappa, phone +358 50 307 19 61 e-mail : Personaldataofficer@titan2.fi . The Personal data protection officer is situated at : Pyhajoki, NPP “Hanhikivi-1” Construction site.

All requests concerning management of personal data shall be directed in English, Russian, Finnish or Swedish to the Personal data officer’s e-mail address.

All received requests will be confirmed and handled within 30 days.

Complaints against actions of JSC “CONCERN TITAN-2” concerning management of Personal data shall be made to the office of the Data protection Ombudsman , in person at the visiting address Ratapihantie 9, 6th floor, 00520 Helsinki; by mail to the postal address: P.O. Box 800, 00521 Helsinki, Finland, or by e-mail: tietosuoja@om.fi

**General principles of Personal data management.**

JSC “CONCERN TITAN-2” (the Company) manages Personal data collected throughout NPP “HANHIKIVI-1” project within boundaries of applicable European Union legal acts, laws of Finland and in selected and justified cases the law the Russian Federation. Main principals concerning Personal data management approved by the Company are:

* Lawfulness of collection and handling of Personal data;
* Need-only approach to Personal data collection and storage;
* Safeguarding Data subjects’ rights related to collected Personal data;
* Restricted and regulated approach to Personal data transfer to internal, external recipients and to trans-border Personal data transfers;
* Use of advanced methods of prevention of Personal data breaches and loss.

The collected Personal data is stored for the duration required by applicable law to enable JSC “Concern Titan-2” to perform its contractual and employment obligations.

**The scope of collected personal data, purposes for processing.**

JSC “Concern Titan-2” collects Personal data only within the scope required for performance the works within the NPP “Hanhikivi-1” project including data on the Company’s potential and current employees, responsible key personnel of the Subcontractors, required information on subcontractors’ employees entered in the electronic Site access database used for providing physical access to the NPP “ Hanhikivi-1” construction site.

The Company neither involves itself in any profiling nor performs electronic assessment of any Data subjects.

**Disclosing of Personal data.**

Personal data collected by the Company may be disclosed to third parties (external recipients) such as:

* Regulatory authorities (Tax office, Pension authorities, Pension insurance companies, the office of the Data protection Ombudsman etc.)
* Accounting and work time management companies provided that they guarantee required level of safeguarding of Personal data;
* Banks and other finance companies where the company has accounts provided that they guarantee required level of safeguarding of Personal data;
* RAOS Project and Fennovoima OY on need only basis provided that they guarantee required level of safeguarding of Personal data;

The Company applies the following principals to the transfer of the Personal data to the external recipients:

* The company discloses the personal data only on need-only basis and only in required scope;
* Prior to data transfer the Company ensures that the external recipients have implemented requirements of Personal data management on the same level as the Company.
* The data is only transferred within applicability of valid contractual relations with external recipients ( not applicable to regulatory authorities).

**Cross border transfer rules.**

 The Contractor intends to transfer personal data to the Russian Federation in its daily business. At the moment the Contractor does not have information on existence or absence of an adequacy decision by the European Commission concerning Personal data transfers to the Russian Federation.

Irrespective of that fact the Contractor applies all appropriate and suitable safeguards to such transfers.