

PERSONAL DATA PROCESSING POLICY

This Policy is aimed at protecting human and citizen's rights and freedoms when processing personal data to include privacy, individual and family secrets and provides for the continuing analysis and improvement of the system and relevant processes, practical implementation of personal data security measures based on the current Russia's and International Law in force, initial and recurrent training of personnel directly involved in and performing personal data processing as regards confidentiality and security.

PRINCIPLES OF IMPLEMENTATION

Fundamentals:

- Personal data shall only be processed on legal and equitable basis.
- Personal data processing shall be limited to specific preliminary defined and legally set purpose. Personal data processing contradicting the personal data collection purpose shall not be allowed.
- Personal data bases shall not be integrated if and where the processing pursues different and incompatible objectives.
- The scope of processing shall meet the declared purpose. Processed personal data shall not be in excess of the declared purpose.
- The processing procedure shall ensure accuracy and sufficiency of personal data and where necessary currency and relevance with regard to the processing purposes. Volga-Dnepr Group shall take (or cause to be taken) the appropriate measures to remove or specify incomplete or inaccurate personal data.
- Personal data shall be stored and disposed of in accordance with the Law of the Russian Federation.
- Volga-Dnepr Group shall not disclose and/or disseminate to Third Parties any personal data without prior agreement with Personal Data Owner unless otherwise specified by the federal Law.
- Volga-Dnepr Group shall provide necessary recourses to ensure that safe data processing measures are being implemented.

With regard to line personnel:

- Volga-Dnepr's personnel is the key component within the personal data processing system.
- Every Volga-Dnepr's employee must be involved in implementation of this Policy.
- Good faith of the personnel in maintaining safety and confidentiality of personal data is being encouraged. Any employee of the Group shall be entitled to refer to executive responsible and report any violation occurring in connection with personal data processing without concern of being penalized.

With regard to managing personnel and persons responsible for personal data processing:

- Volga-Dnepr's managing personnel shall promote and implement personal data processing culture in accordance with International and Russian Law.

- Volga-Dnepr Group shall assign a responsible person to ensure that personal data processing procedure is in place and being maintained operational.
- Person responsible shall take resolutions to prevent violations of personal data processing procedure and upon agreement with the higher managing personnel shall take effort to eliminate identified deficiencies of the system and if required actively communicate with competent government authorities for this purpose.
- Investigation of violations shall always be carried out independently from any other investigation. The purpose of such investigation shall be to identify causes and take prompt corrective action as necessary to prevent recurrence of such incidents in future.

With regard to Customers, Providers and Partners:

- Volga-Dnepr Group is promoting safe and secure personal data processing procedure thereby helping facilitate confidence between Customers, providers and Partners,

S.I. Shklyanik, Senior Vice President
Volga-Dnepr Group

V.A. Gabriel, Executive President
Volga-Dnepr Airlines

T.V. Arslanova, Executive President
AirBridge Cargo Airlines

V.V. Sherin, General Director
Volga-Dnepr Technics Moscow

G.V. Isaikina, Director
Management Technologies Department

A.A. Eremin, Director
Legal Department