

PERSONAL DATA PROCESSING AND SECURITY POLICY AT POLEMA JSC

1. GENERAL PROVISIONS

1.1. This Personal Data Processing and Security Policy at Polema JSC (hereinafter referred to as the Policy) defines the general principles of personal data processing and contains information about the requirements for personal data protection implemented at Polema JSC (TIN 7105008070), located at: Przheval'skogo street, 3, Tula, 300016 (hereinafter referred to as the Controller).

The purpose of the Policy adoption is to ensure human and civil rights and freedoms when processing their personal data, including the protection of the rights to privacy, personal and family secrets.

1.1.1. The Policy applies to all personal data of subjects processed at Polema JSC whether or not by automated means.

1.1.2. The Policy is developed in accordance with Federal Law No. 152-FZ dated 27.07.2006 "On Personal Data" and other legislative and regulatory legal acts (hereinafter referred to as the Legislation) defining the procedure for personal data management and requirements for ensuring their security.

1.1.3. Unlimited access to this Policy is provided to anyone who wants to read it.

1.1.4. This Policy is posted on the official website of Polema JSC on the Internet ([https://www.polema.net /](https://www.polema.net/)), as well as in a place accessible to visitors and employees of the Operator in the office of JSC Polema and its separate divisions.

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1.2. For the purposes of this Policy, the following definitions are used:

Personal data means any information relating directly or indirectly to a specific or identifiable natural person (personal data subject).

Controller means a legal entity that alone or jointly with other persons organizes and/or performs the processing of personal data, as well as determines the purposes of personal data processing, the composition of personal data to be processed, and actions (operations) performed with personal data.

Subject means the subject of personal data.

An employee means an individual who is in the employ of the Controller.

Personal data processing means any action (operation) or set of actions (operations) performed whether or not by automated means with personal data, including collection, recording, structuring, accumulation, storage, rectification (updating, modification), retrieval, use, transfer (disclosure, provision, access), pseudonymisation, blocking, erasure, destruction of personal data.

Automated personal data processing means processing of personal data using computer technology.

Disclosure of personal data means actions aimed at disclosing personal data to an indefinite number of persons.

Provision of personal data means actions aimed at disclosing personal data to a specific person or a specific group of people.

Blocking of personal data means temporary termination of processing of personal data (except in cases where the processing is necessary to rectify personal data).

Destruction of personal data means actions as a result of which it becomes impossible to restore the content of personal data in the personal data filing system and (or) as a result of which the physical data carriers are destroyed.

Pseudonymisation of personal data means actions that make it impossible to determine whether personal data belongs to a specific personal data subject without using additional information.

Personal data filing system is a set of personal data contained in databases and information technologies and technical means that ensure their processing.

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Cross-border personal data transfer means 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.

1.3. Rights and obligations of the Controller and Personal Data Subjects.

1.3.1. The personal data subject has the right to:

1.3.1.1. Withdraw consent to the processing of his personal data;

1.3.1.2. add, supplement or modify the personal data being processed;

1.3.1.3. require the Controller to rectify his personal data, block or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing;

1.3.1.4. receive information regarding processing of his personal data, including information containing: (1) confirmation of personal data processing by the Controller; (2) the legal grounds and purposes of personal data processing; (3) the purposes and methods of personal data processing used by the Controller; (4) the name and location of the Controller, information about persons (except for Controller's employees) who have access to personal data or to whom personal data may be disclosed to on the basis of an agreement with the Controller or on the basis of federal law; (5) the personal data being processed and related to the relevant personal data subject, and the source of their collection, unless another procedure for submitting such data is provided for by federal law; (6) the terms of processing personal data, including the terms of its storage; (7) the procedure for exercising the rights by the personal data subject provided for by the Federal Law of July 27 Federal Law No. 152-FZ of 2006 "On Personal Data" (hereinafter – the Federal Law "On Personal Data"); (8) information on the completed or proposed cross-border data transfer; (9) the name or surname, first name, patronymic and address of the person who processes personal data on behalf of the Controller, if the processing has been or will be entrusted to such a person; (10) other information provided for by the Federal Law "On Personal Data" or other federal laws.

1.3.1.5. contact the Controller and send requests to him;

1.3.1.6. take legal measures to protect their rights;

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1.3.1.7. exercise other rights provided for by the legislation of the Russian Federation.

1.3.2. The right of a personal data subject to access his personal data may be restricted in accordance with the federal laws of the Russian Federation.

1.3.3. In case of incapacity of the personal data subject, consent to processing of his personal data is given by the legal representative of the personal data subject.

1.3.4. The Personal Data Subject or his legal representative undertakes to provide accurate personal data.

1.3.5. To receive information regarding personal data processing, the personal data subject may send a written request (the request may also be sent in the form of an electronic document and signed with an electronic signature) to the Controller's location address in accordance with the procedure established by section 6 of this Policy.

1.3.6. The Controller shall:

1.3.6.1. when collecting personal data, provide the personal data subject, at his request, with information about personal data processing provided for in clause 1.3.1.4. of this Policy, or legally provide a refusal;

1.3.6.2. notify the personal data subject about personal data processing if personal data was not received from the personal data subject (the form for notifying the subject of the start of processing of his personal data received from a third party is provided in Appendix No. 4 to this Policy);

1.3.6.3. in case of refusal to provide personal data, explain to the subject the consequences of such refusal;

1.3.6.4. publish or otherwise provide unrestricted access to this Policy;

1.3.6.5. take the necessary legal, organizational and technical measures or ensure their adoption to protect personal data from unlawful or accidental access to it, destruction, modification, blocking, copying, provision, disclosure of personal data, as well as from other unlawful actions with respect to personal data;

1.3.6.6. provide the personal data subject, upon his request, with information regarding processing of his personal data, or to legally provide a refusal;

1.3.6.7. upon request from the personal data subject, rectify personal data being processed, block or delete if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing;

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1.3.6.8. if the purpose of personal data processing is achieved, immediately terminate processing of personal data and destroy the relevant personal data within a period not exceeding thirty days from the date of achievement of the purpose of personal data processing, unless otherwise provided by federal laws;

1.3.6.9. if the personal data subject withdraws consent to processing of his personal data, terminate processing of personal data and destroy personal data within a period not exceeding thirty days from the date of receipt of the said withdrawal, unless otherwise provided by an agreement between the Controller and the personal data subject;

1.3.6.10. comply with other obligations stipulated by the legislation of the Russian Federation.

1.4. Principles of personal data processing.

Personal data processing is performed by the Controller in accordance with the principles established by the Federal Law "On Personal Data":

1.4.1. personal data is processed lawfully and fairly;

1.4.2. processing of personal data is limited to achievement of specified, explicit and legitimate purposes. Processing of personal data incompatible with the purposes of personal data collection is not allowed;

1.4.3. it is not allowed to combine databases containing personal data, the processing of which is performed for purposes incompatible with each other;

1.4.4. only the personal data that meets the purposes of its processing are subject to processing;

1.4.5. the content and volume of personal data being processed shall correspond to the stated purposes of processing. The personal data being processed should not be redundant in relation to the stated purposes of processing; 1.4.6. when processing personal data, the accuracy of personal data, its sufficiency, and, if necessary, its relevance to the stated purposes of its processing are ensured;

1.4.7. personal data is stored in a form that makes it possible to identify the subject of personal data for no longer than the purposes of personal data processing require, unless the period of personal data storage is established by federal law, an agreement to which the personal data subject is a party, beneficiary or guarantor. The processed personal data is subject to destruction or pseudonymisation upon achievement of the processing purposes or in case of loss of the need to achieve these purposes, unless otherwise provided by federal law.

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2. PURPOSES OF PERSONAL DATA PROCESSING

Personal data is processed by the Controller for the following purposes:

- 2.1. ensuring compliance with the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation, and local regulatory acts of the Controller;
- 2.2. implementation and fulfillment of the functions, powers and duties assigned to the Controller by the legislation of the Russian Federation, in particular: - compliance with the requirements of legislation in the field of labor and taxation; - maintenance of current accounting and tax records, formation, production and timely submission of accounting, tax and statistical reports; - compliance with the requirements of the legislation on determining the procedure for processing and protecting personal data of citizens who are clients, contractors or applicants for vacant Controller positions within the framework of legal relations regulated by the Labor Code of the Russian Federation;
- 2.3. provision of additional guarantees and compensations to the Controller's employees and their family members, including non-state pension provision, voluntary medical insurance, medical care and other types of social security;
- 2.4. communication with the subject, if necessary, including sending news messages, notifications, information, as well as processing applications, requests and demands;
- 2.5. ensuring access control on the Controller's territory;
- 2.6. promotion of goods, works, and services on the market through direct contacts with the personal data subject;
- 2.7. conducting statistical and other research based on anonymized data;
- 2.8. exercising the rights and legitimate interests of the Controller or third parties in the framework of activities provided for by the Charter and other local regulations of the Controller or third parties, or achieving socially significant goals, provided that the rights and freedoms of the personal data subject are not violated;
- 2.9. for other legitimate purposes.

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3. LEGAL BASIS FOR PERSONAL DATA PROCESSING

3.1. The legal basis for personal data processing is a set of regulatory legal acts, in compliance and in accordance with which the Controller processes personal data, including:

The Constitution of the Russian Federation;

Federal Law No. 152-FZ of 27.07.2006 "On Personal Data";

The Civil Code of the Russian Federation;

The Labor Code of the Russian Federation;

The Tax Code of the Russian Federation;

Federal Law No. 149-FZ of 27.07.2006 "On Information, Information Technologies and Information Protection";

Federal Law No. 63-FZ of 06.04.2011 "On Electronic Signatures";

other normative legal acts regulating relations connected with the Controller's activities.

The legal basis for personal data processing is also:

the Charter and local regulations of the Controller;

Contracts signed between the Controller and the personal data subject;

civil law contracts concluded by the Controller with counterparties;

consent to personal data processing, the terms of which are confirmed by the personal data subject when filling in the feedback form on the Controller's website, as well as consent to personal data processing in other cases not directly provided for by the legislation of the Russian Federation, but corresponding to the powers of the Controller.

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4. SCOPE AND CATEGORIES OF PERSONAL DATA PROCESSED, CATEGORIES OF PERSONAL DATA SUBJECTS

4.1. The content and scope of the personal data processed shall comply with the stated purposes of processing provided for in section 2 of this Policy. The personal data being processed should not be redundant in relation to the stated purposes of their processing.

4.2. The Controller may process personal data of the following categories of personal data subjects.

4.2.1. Candidates for employment with the Controller: (1) last name, first name, patronymic; (2) gender; (3) nationality; (4) date and place of birth; (5) contact information; (6) information about education, work experience, qualifications; (7) other personal information provided by candidates in CVs and cover letters.

4.2.2. Employees and former employees of the Controller:

(1) last name, first name, patronymic; (2) gender; (3) nationality; (4) Date and place of birth; (5) Image (photo); (6) passport data; (7) residence address; (8) actual address (9) contact information; (10) taxpayer identification number; (11) insurance number of individual personal account (SNILS); (12) information about education, qualifications, professional training and advanced training; (13) marital status, parental status, family ties; (14) information about employment, including the availability of incentives, awards and/or disciplinary penalties; (15) information about marriage registration; (16) information about military registration; (17) information about disability; (18) information about maintenance deduction; (19) information about income from the previous place of work (20) other personal data provided by employees in accordance with the requirements of labor legislation.

4.2.3. Family members of the Controller's employees:

(1) last name, first name, patronymic; (2) Degree of kinship; (3) year of birth; (4) other personal data provided by employees in accordance with the requirements of labor legislation.

4.2.4. The Controller's clients and counterparties (individuals):

(1) last name, first name, patronymic; (2) date and place of birth; (3) passport data; (4) residence address; (5) contact information; (6) position held; (7) taxpayer identification number; (8) current account number; (9) other personal data provided by clients and counterparties (individuals) necessary for the conclusion and execution of contracts.

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4.2.5. Representatives (employees) of the Controller's clients and counterparties (legal entities):

(1) last name, first name, patronymic; (2) passport data; (3) contact information; (4) position held; (5) other personal data provided by representatives (employees) of clients and counterparties necessary for the conclusion and execution of contracts.

4.2.6. Users of sites managed by the Controller:

(1) personal information that the user of the website provides about himself when registering (creating an account) or in the process of using the site; (2) data that is automatically transmitted to the site's services during their use by the software installed on the user's device, including IP address, cookie data, information about the user's browser (or other program that accesses the services), technical characteristics of the hardware and software used by the user, the date and time of access to the services, the addresses of the requested pages and other similar information; (3) other information about the user, the processing of which is provided for in the user agreement (Terms and Conditions).

4.2.7. Individuals who participate in contests, festivals, and other events organized by the Controller:

(1) last name, first name, patronymic; (2) passport data; (3) contact information; (4) other information, the processing of which is provided for by the rules of the competition.

4.3. In cases provided for by law, the personal data subject decides to provide his personal data to the Controller and agrees to their processing freely, voluntarily and in his own interest.

4.4. The Controller ensures that the content and the scope of personal data being processed correspond to the stated purposes of processing and, if necessary, takes measures to eliminate their redundancy in relation to the stated purposes of processing.

4.5. The Controller does not process special categories of personal data related to race, nationality, political opinions, religious or philosophical beliefs, health status, or intimate life.

4.6. The processing of biometric personal data by the Controller (information that characterizes the physiological and biological data of a person, on the basis of which his identity can be established) is performed in accordance with the legislation of the Russian Federation.

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5. PROCEDURE AND CONDITIONS OF PERSONAL DATA PROCESSING

5.1. When processing personal data, the Controller performs the following actions with personal data: collection, recording, structuring, accumulation, storage, rectification (updating, modification), retrieval, use, transfer (disclosure, provision, access), pseudonymisation, blocking, erasure, destruction of personal data.

5.2. Personal data processing is performed by the Controller in the following cases:

5.2.1. with consent of the personal data subject to the processing of his personal data;

5.2.2. personal data processing is necessary to achieve the goals stipulated by an international contract of the Russian Federation or a law, to carry out and fulfill the functions, powers and duties assigned to the Controller by the legislation of the Russian Federation;

5.2.3. personal data processing is performed in connection with the participation of a person in constitutional, civil, administrative, criminal proceedings, and arbitration proceedings ; personal data processing is necessary for enforcement 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;

5.2.4. personal data processing is necessary for the performance of the powers of federal executive authorities, bodies of state extra-budgetary funds, executive bodies of state power of members of the Russian Federation, local government and the functions of companies involved in the provision of state and municipal services, respectively, provided for by Federal Law No. 210-FZ of July 27, 2010 "On the Organization of the Provision of State and Municipal services", including registration of the personal data subject on the unified portal of state and municipal services and (or) regional portals of state and municipal services;

5.2.5. personal data processing is necessary for the performance of a Contract to which the personal data subject is a party or beneficiary or guarantor, as well as for the conclusion of a Contract on the initiative of the personal data subject or a Contract under which the personal data subject will be the beneficiary or guarantor;

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- 5.2.6. Personal data processing is necessary to protect the life, health or other vital interests of the personal data subject if it is impossible to obtain the consent of the personal data subject;
- 5.2.7. personal data processing is necessary to exercise the rights and legitimate interests of the Controller or third parties, or to achieve socially significant goals, provided that the rights and freedoms of the personal data subject are not violated;
- 5.2.8. personal data processing is necessary to exercise the rights and legitimate interests of the Controller or third parties, or to achieve socially significant goals, provided that the rights and freedoms of the personal data subject are not violated;
- 5.2.9. personal data processing is performed subject to mandatory pseudonymisation of personal data for statistical or other research purposes, except for the purposes of promoting goods, works, and services on the market through direct contact with a potential consumer by means of communication;
- 5.2.10. personal data processing obtained as a result of pseudonymisation of personal data is performed in order to increase the efficiency of state or municipal management, as well as for other purposes provided for by Federal Law No. 123-FZ of April 24, 2020 "On Conducting an experiment to establish special regulation in order to create the necessary conditions for the development and implementation of artificial intelligence technologies in the member of the Russian Federation - the city of Moscow of federal significance and amendments to Articles 6 and 10 of the Federal Law "On Personal Data" and Federal Law No. 258-FZ of July 31, 2020 "On Experimental Legal Regimes in the Field of Digital Innovations in the Russian Federation", in accordance with the procedure and under the conditions provided for by the said federal laws;
- 5.2.11. the processing of personal data is performed, the access of an unlimited number of persons to which is provided by the personal data subject or at his request;
- 5.2.12. processing of personal data is performed subject to publication or mandatory disclosure in accordance with federal law.
- 5.3. Personal data processing is performed by the Controller as follows:
 - 5.3.1. manual processing of personal data;
 - 5.3.2. automated processing of personal data with or without transmission of the received information via information and telecommunication networks;
 - 5.3.3. mixed processing of personal data.

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5.4. When collecting personal data, the Controller shall provide the personal data subject or his representative, at his request, with information related to the processing of the subject's personal data (paragraph 1.3.1.4 of this Policy).

5.5. If provision of personal data is mandatory in accordance with federal law, the Controller is obliged to explain to the personal data subject the legal consequences of refusing to provide his personal data.

5.6. The personal data subject decides on the provision of his personal data and agrees to their processing freely, voluntarily and in his own interest. Consent to personal data processing may be given by the personal data subject or his representative. Consent in the form of an electronic document signed with an electronic signature in accordance with federal law is considered equivalent to written consent on paper containing a handwritten signature of the personal data subject. A simple electronic signature is an electronic signature that, through the use of codes, passwords, including a username and password to log in to the Controller's website or a code sent in an SMS message or other means, confirms the formation of an electronic signature by a certain person. The application form for the subject's consent to processing of his personal data is provided in Appendix No. 1 to this Policy. The consent to personal data processing, signed by the personal data subject with a simple electronic signature, includes the information specified in Part 4 of art. 9 of Federal Law "On Personal Data".

5.7. Written consent is not required if personal data is processed in the cases specified in paragraphs 5.2.2 – 5.2.9 of this Policy, in accordance with art. 6 of the Federal Law "On Personal Data".

5.8. Consent to personal data processing may be withdrawn by the personal data subject. Withdrawal of consent form is provided in Appendix No. 3 to this Policy.

5.9. If the personal data subject withdraws consent to personal data processing, the Controller has the right to continue processing personal data without the consent of the personal data subject, subject to the grounds set out in paragraphs 5.2.2 – 5.2.12 of this Policy.

5.10. If personal data is not received from the personal data subject, the Controller, except for the cases provided for in paragraph 5.11 of this Policy, shall provide the personal data subject with the following information prior to the start of processing such personal data:

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- 5.10.1. name and address of the Controller or his representative;
- 5.10.2. the purpose of personal data processing and its legal basis;
- 5.10.3. list of personal data;
- 5.10.4. intended users of personal data;
- 5.10.5. the rights of the personal data subject established by the Federal Law "On Personal Data";
- 5.10.6. the source of receiving personal data.
- 5.11. The Controller is relieved of the obligation to provide the personal data subject with the information set out in paragraph 5.10 of this Policy in cases when:
 - 5.11.1. the personal data subject has been notified about the processing of his personal data by the relevant Controller;
 - 5.11.2. personal data was obtained by the Controller on the basis of a federal law or in connection with the execution of a contract to which the personal data subject is a party or beneficiary or guarantor;
 - 5.11.3. personal data processing authorized by the personal data subject for disclosure is performed in compliance with the prohibitions and conditions provided for in Article 10.1 of the Federal Law "On Personal Data";
 - 5.11.4. the Controller processes personal data for statistical or other research purposes, for the exercise of professional journalistic activity, or for scientific, literary or other creative activities, provided that the rights and legitimate interests of the personal data subject are not violated;
 - 5.11.5. providing the personal data subject with the information set out in clause 5.10 of this Policy violates the rights and legitimate interests of third parties.
- 5.12. When collecting personal data, including through the Internet information and telecommunications network, the Controller ensures the recording, structuring, accumulation, storage, rectification (updating, modification), retrieval of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except for the cases specified in the Federal Law "On Personal Data".
- 5.13. Subjects' personal data can be obtained, further processed, and stored both on paper and electronically.
- 5.14. Personal data recorded on paper is stored in lockable cabinets located in lockable rooms with limited access rights.

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5.15. The Controller ensures protection of personal data recorded on paper from unauthorized access and copying in accordance with Decree of the Government of the Russian Federation dated 15.09.2008 No. 687 "On Approval of the Regulation on Specifics of Personal Data Processing Performed Without Automation Tools".

5.16. Subjects' personal data, processed using automation tools for different purposes, is stored in different folders (tabs).

5.17. It is not allowed to store and place documents containing personal data in open electronic catalogs (file sharing sites).

5.18. Personal data storage in a form that makes it possible to identify the personal data subject is performed for no longer than the purposes of its processing require, and it is subject to destruction upon achievement of the purposes of processing or in case of loss of the need to achieve them.

5.19. All electronic databases of the Controller containing personal data are stored on the territory of the Russian Federation at the address of the Controller's location.

5.20. Personal data of subjects is stored for no longer than the purposes of its processing require, and it is subject to destruction upon achievement of the purposes of processing or in case of loss of the need to achieve them.

5.21. Destruction of personal data should exclude the possibility of subsequent recovery.

5.22. Destruction of documents (media) containing personal data is performed by shredding, eliminating the possibility of information recovery.

5.23. Personal data on electronic media is destroyed by deleting the corresponding values in the database using the computer's operating system, eliminating the possibility of recovering this data.

5.24. The destruction is performed by the commission. The fact of destruction of personal data is documented by Certificate Of Destruction of Personal Data signed by the members of the commission.

5.25. The Controller transfers personal data to third parties in the following cases:

5.25.1. The Subject has expressed his consent to such actions (the application form for consent of the subject to transfer his personal data to a third party is provided in Appendix No. 5 to this Policy);

5.25.2. The transfer is provided for by Russian or other applicable legislation within the framework of the procedure established by law.

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- 5.26. All employees who have access to the personal data of the subjects are required to sign a non-disclosure agreement.
- 5.27. In order to comply with the legislation of the Russian Federation, to achieve the purposes of processing, as well as in the interests of personal data subjects, the Controller provides personal data to the following third parties in the course of its activities:
- 5.27.1. Tax authorities of the Russian Federation;
 - 5.27.2. To the Pension Fund of Russia (only about subjects that are employees of the Controller);
 - 5.27.3. Non-governmental pension funds (only about subjects that are employees of the Controller);
 - 5.27.4. Social Insurance Fund;
 - 5.27.5. Territorial Compulsory Medical Insurance Fund;
 - 5.27.6. Medical insurance organizations for compulsory and voluntary medical insurance (only about subjects who are employees of the Controller);
 - 5.27.7. Payroll banks (on the basis of a contract; only for subjects that are employees of the Controller);
 - 5.27.8. Bodies of inquiry and preliminary investigation, other authorized bodies on the grounds provided for by the legislation of the Russian Federation;
 - 5.27.9. Enterprises, companies, and corporations that have been delegated the authority to store and process data. In this case, the Controller in the contract obliges the person who processes personal data on behalf of the Controller to comply with the principles and rules of personal data processing provided for in this Policy and the Federal Law "On Personal Data". The specific names and locations of the relevant third parties, the purposes of the transfer, the scope of personal data transferred, the list of actions for its processing, methods and other conditions of processing, including requirements for the protection of processed personal data, are specified in local regulations governing the processing of personal data of Polema JSC employees and other subjects of personal data.
- 5.28. If the Controller assigns personal data processing to another person, the Controller is responsible to the personal data subject for the actions of the specified person. The person who processes personal data on behalf of the Controller is responsible to the Controller.
- 5.29. The Controller undertakes and obliges other persons who have gained access to personal data not to disclose to third parties and

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not to distribute personal data without the consent of the personal data subject, unless otherwise provided by federal law.

5.30. When processing personal data, the Controller takes the necessary and sufficient legal, organizational and technical measures to protect personal data from unlawful or accidental access to it, destruction, modification, blocking, copying, provision, disclosure to ensure compliance with the obligations stipulated by the Federal Law "On Personal Data" and the regulatory legal acts adopted in accordance with it, as well as from other illegal actions in relation to personal data. These measures include:

5.30.1. appointment by the Controller of the person responsible for the organization of personal data processing;

5.30.2. the issuance by the Controller of documents defining the Controller's policy regarding personal data processing, local acts on personal data processing, as well as local acts establishing procedures aimed at preventing and detecting violations of the legislation of the Russian Federation and eliminating the consequences of such violations;

5.30.3. application of legal, organizational and technical measures to ensure the security of personal data;

5.30.4. implementation of internal control and (or) audit of compliance of personal data processing with the Federal Law "On Personal Data" and the regulatory legal acts adopted in accordance with it, requirements for personal data protection, Controller's policy regarding personal data processing, Controller's local acts;

5.30.5. Assessment of harm that may be caused to personal data subjects in case of violation of the Federal Law "On Personal Data", the ratio of the specified harm and the measures taken by the Controller aimed at ensuring the fulfillment of obligations stipulated by the Federal Law "On Personal Data";

5.30.6. familiarization of the Controller's employees who directly process personal data with the provisions of the legislation of the Russian Federation on personal data, including requirements for personal data protection, documents defining the Controller's policy on personal data processing, local acts on personal data processing, and (or) training of these employees.

5.31. Conditions for termination of personal data processing:

5.31.1. achieving the purposes of personal data processing,

5.31.2. expiration of the consent period or withdrawal of the consent of the personal data subject to the processing of his personal data,

5.31.3. identification of unlawful processing of personal data.

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5.32. Personal data is stored in a form that makes it possible to identify the subject of personal data, no longer than the purposes of personal data processing require, unless the period of personal data storage is established by federal law, a Contract to which the personal data subject is a party, beneficiary or guarantor. The processed personal data is subject to destruction or pseudonymisation upon achievement of the purposes of processing or in case of loss of the need to achieve these purposes, unless otherwise provided by federal law.

5.33. The terms of personal data processing are determined in accordance with the term of the contract with the personal data subject, regulatory legal acts of the Russian Federation and regulatory documents of authorized state authorities.

5.34. When storing personal data, the Controller uses databases located on the territory of the Russian Federation in accordance with Part 5 of Article 18 of the Federal Law "On Personal Data".

5.35. Processing of personal data without the automated means.

5.35.1. Personal data should be separated from other information by recording it on separate physical media, in special sections.

5.35.2. When personal data is recorded on physical data carriers, it is not allowed to record personal data on one physical data carrier, which purposes of processing are obviously incompatible.

5.35.3. When working with documents containing personal data, the Controller's employee shall eliminate the possibility of familiarization and viewing of these documents by persons who are not allowed to work with them (including other employees of their structural unit).

5.35.4. When documents containing personal data are taken outside the Controller's territory for business reasons, the employee shall take all possible measures to prevent the loss (misplacement, theft) of such documents.

5.36. Employees who are authorized to process personal data are prohibited:

5.36.1. to disclose information that is personal data to persons who do not have the right to access this information;

5.36.2. make unrecorded copies of documents containing personal data;

5.36.3. leave documents containing personal data unattended on desktops;

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- 5.36.4. leave the room without placing documents with personal data in lockable cabinets;
- 5.36.5. to remove documents containing personal data from premises without official necessity.
- 5.37. Cross-border transfer of personal data is performed in accordance with the Federal Law "On Personal Data" and international contracts of the Russian Federation.
- 5.38. The person responsible for organizing the processing of personal data shall:
 - 5.38.1. to exercise internal control over the compliance of the Controller and its employees with the legislation of the Russian Federation on personal data, including the requirements for personal data protection;
 - 5.38.2. to bring to the attention of the Controller's employees the provisions of the legislation of the Russian Federation on personal data, local acts on personal data processing, and personal data protection requirements;
 - 5.38.3. organize the receipt and processing of requests and applications from personal data subjects or their representatives and monitor the receipt and processing of such requests and applications.

6. UPDATING, CORRECTING, ERASING AND DESTROYING PERSONAL DATA, RESPONDING TO REQUESTS FROM SUBJECTS FOR ACCESS TO PERSONAL DATA

- 6.1. If the inaccuracy of personal data or its illegal processing is confirmed, personal data shall be updated by the Controller, and processing shall be terminated accordingly.
- 6.2. Upon achieving the purposes of personal data processing, as well as in the event that the personal data subject withdraws consent to its processing, personal data is subject to destruction if:
 - 6.2.1. unless otherwise provided for in the contract to which the personal data subject is a party, beneficiary or guarantor;
 - 6.2.2. the Controller does not have the right to process personal data without the consent of the personal data subject on the grounds provided for by the Federal Law "On Personal Data" or other federal laws;
 - 6.2.3. unless otherwise provided by another agreement between the Operator and the personal data subject.
- 6.3. The Controller shall inform the personal data subject or his representative about the processing of such subject's personal data upon the latter's request. The request shall contain the number of the main identity document

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of the personal data subject or his representative, information about the date of issue of the specified document and the issuing authority, information confirming participation of the personal data subject in relations with the Controller (contract number, date of contract signing, abbreviation and (or) other information), or information otherwise confirming the fact of personal data processing by the Controller, the signature of the personal data subject or his representative. The request form for information regarding the personal data processing of a personal data subject is provided in Appendix No. 2 to this Policy.

6.4. The request can be sent:

6.4.1. in writing to the registered office address of Polema JSC;

6.4.2. in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation. The request in the form of an electronic document is sent to polema@metholding.com;

6.5. If the information concerning the processing of the subject's personal data, as well as the personal data being processed, has been provided to the personal data subject for review upon his request, the personal data subject has the right to contact the Controller again or send him another request in order to obtain the specified information and familiarize himself with such personal data no earlier than thirty days after the initial applying or sending an initial request, unless a shorter period is established by federal law, a regulatory legal act adopted in accordance with it or a Contract to which the personal data subject is a party or beneficiary or guarantor;

6.6. The personal data subject has the right to contact the Controller again or send him another request in order to obtain the information specified in subparagraph 1.5.1.4 of this Policy, as well as to familiarize himself with the personal data being processed before the expiration of period specified in paragraph 6.5 of this Policy, if such information and (or) the personal data being processed has not been provided to him for review in full based on the results of review of the initial application. Another request, along with the information specified in clause 6.3 of this Policy, shall contain a justification for sending this another request.

6.7. The Controller has the right to refuse to fulfill another request to the personal data subject that does not comply with the conditions stipulated in clauses 6.5, 6.6 of this Policy. Such a refusal shall be motivated. The Controller is responsible for providing justification for refusal to fulfill another request.

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7. FINAL PROVISIONS

7.1. This Policy is subject to change and addition, if necessary, including in the case of new legislative acts and special regulatory documents on the processing and protection of personal data.

7.2. This Policy is an internal document of the Controller, posted on the Controller's websites during events organized/co-organized by Polema JSC related to obtaining personal data through such sites.

In case of changes, such changes are communicated to an unlimited number of people by posting the Policy on the relevant Controller's website, taking into account such changes.

7.3. The new version of the Policy comes into force from the moment of its approval, unless otherwise provided by the new version of the Policy or the order on its approval.

7.4. Persons guilty of violating the norms governing the receipt, processing and protection of personal data are held disciplinarily and financially liable in accordance with the procedure established by the Labor Code of the Russian Federation and other federal laws, as well as held civilly, administratively, and criminally liable in accordance with the procedure established by the legislation of the Russian Federation.

7.5. Compliance with the requirements of this Policy is monitored by the person responsible for organizing the personal data processing.

General Director

A.V.Philippov