

**Personal Data Processing Policy at Limited
Liability Company Masloekstraktsionniy zavod
Yug Rusi**Supercedes П 038-2-
2019Approved and brought into effect
by Order issued by Executive Director of MEZ Yug Rusi LLCdd May 13, 2025 No. 62Effective from: May 13, 2025**1 Scope of Application**

1.1 The Policy of Limited Liability Company Masloekstraktsionniy zavod Yug Rusi (MEZ Yug Rusi LLC), Primary State Registration Number (OGRN) 1026104140842, Taxpayer Identification Number (INN) 6167055777, having its registered office at: 8 Tolstogo Sq., Rostov-on-Don, 344037, Rostov region (hereinafter referred to as the “Company”) with respect to personal data processing (hereinafter referred to as the “Policy”) have been developed in pursuance of the requirements of cl. 2 of part 1 of Article 18.1 of Federal Law No. 152-Ф3 dated July 27, 2006, “On Personal Data” (hereinafter referred to as the “Law on Personal Data”) for the purpose to comply and ensure the protection of the rights and freedoms of every person and, in particular, the right to privacy, personal and family secrecy, protection of one’s honor and honest name.

1.2 The Policy shall be applied in all structural subdivisions of the Company and shall be strictly enforced by all managers and employees of the Company.

1.3 All personal data processed by the Company is confidential, strictly protected information in accordance with the legislation of the Russian Federation. The operator which has obtained access to personal data shall observe confidentiality of personal data - not to disclose to third parties and not to disseminate personal data without the consent of the subject of personal data, unless otherwise provided for by federal law.

1.4 This Policy is freely accessible to any subject of personal data, including via the Internet.

In pursuance of the requirements of part 2 of Article 18.1 of the Law on Personal Data, this Policy is freely available at the Company’s HR Department and is published on the information and telecommunication network Internet on the Company’s websites, including on the Company’s corporate website at <https://kiu.yugrusiagro.ru/> in the “Internal Regulatory Documents” section.

1.5 The Company periodically updates this Policy and has the right to unilaterally change its terms and conditions at any time. The Company recommends checking from time to time the contents of this Policy for possible changes thereto.

1.6 The Policy applies to the relations in the field of personal data processing that arose for the Company both before and after the approval of this Policy.

Unless otherwise provided for in the Policy, all amendments thereto shall take effect from the date of their introduction by order of the Executive Director of the Company.

1.7 In all other matters not provided for by this Policy, the Company shall be guided by the provisions of the applicable laws of the Russian Federation.

1.8 Responsibility for keeping these Regulations up-to-date lies with the Head of the HR Department of the Company.

2 Definitions

2.1 The following terms with corresponding definitions are used in the document:

automated processing of personal data – processing of personal data using computer equipment;

blocking of personal data – temporary cessation of personal data processing (except for cases when processing is necessary to clarify personal data);

information – data (reports, details) regardless of the form of their presentation;

personal data information system - a set of personal data contained in databases as well as information technologies and technical means ensuring their processing;

processing of personal data - any action (operation) or set of actions (operations) performed with personal data with or without the use of automation means. Processing of personal data includes, but is not limited to: collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;

depersonalization of personal data - actions, which make it impossible to determine whether any personal data belongs to a particular subject of personal data without using additional information.

operator - a person which, independently or jointly with other persons, arranges and (or) performs processing of personal data, as well as determines the purposes of personal data processing, composition of personal data subject to processing, actions (operations) performed with personal data. For the purposes of this Policy, the Company which processes personal data is an operator, unless otherwise expressly stated in the Policy;

personal data - any information relating, directly or indirectly, to a defined or identifiable natural person (subject of personal data). Such information, in particular, includes: surname, first name and patronymic, year, month, date and place of birth, address, information about family, social, property status, information about education, profession, income, as well as other information that cumulatively makes it possible to determine (identify) the subject of personal data;

provision of personal data - actions aimed at disclosure of personal data to a certain person or a certain circle of persons;

dissemination of personal data - actions aimed at disclosure of personal data to an indefinite number of persons;

subject of personal data - a natural person whose personal data is processed;

cross-border transfer of personal data - transfer of personal data to a foreign country to a foreign government authority, a foreign natural person or a foreign legal entity;

destruction of personal data - actions which result in the inability to restore the content of personal data in the personal data information system and (or) in destruction of material carriers of personal data;

cookies – small pieces of data sent by a web server and stored on the client's electronic device. They are used to simplify the customer's experience of using the site and to collect analytics by the Company to improve the quality of services provided on the site. Cookies do not contain any confidential information.

2.2 Terms and definitions are used in this Policy in accordance with the meanings defined by the current legislation of the Russian Federation, including the Law on Personal Data, unless otherwise expressly stated in the Policy.

3 Personal Data Processing Procedure

3.1 By personal data security the Company understands the robustness of personal data to unlawful or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as to other unlawful actions in relation to personal data and the Company takes the necessary legal, organizational and technical measures to protect personal data.

3.2 Processing and ensuring security of personal data at the Company is carried out in accordance with the requirements of the Constitution of the Russian Federation, the Law on Personal Data, bylaws, other laws of the Russian Federation defining the cases and peculiarities of personal data processing, as well as guiding and methodological documents of the Government of the Russian Federation, the Ministry for Digital Technology, Communication and Mass Media of the Russian Federation, Roskomnadzor, the Federal Service for Technical and Export Control of Russia and the Federal Security Service of Russia.

3.3 The Company processes personal data for each purpose of its processing in the following ways:

- non-automated processing of personal data;
- automated processing of personal data with or without transmission of the obtained information via information and telecommunication networks;
- mixed processing of personal data.

3.4 When processing personal data, the Company adheres to the following principles:

- to ensure lawfulness and fairness;
- to limit the processing of personal data to the achievement of specific, predetermined and legitimate purposes;
- to prevent the personal data processing incompatible with the purposes of personal data collection;
- to prevent the merging of databases containing personal data processed for incompatible purposes;
- to comply with the content and scope of processed personal data with the stated processing purposes;

– to avoid redundancy of processed personal data in relation to the stated processing purposes;

– to ensure the accuracy of personal data, their sufficiency and, where necessary, relevance in relation to the purposes of personal data processing, as well as to take measures to delete or clarify incomplete or inaccurate data;

– to ensure transparency of personal data processing: the subject of personal data may be provided with relevant information regarding the processing of their personal data;

– to store personal data in a form that allows to identify the subject of personal data for no longer than required by the stated purposes of personal data processing.

3.5 The Company processes personal data in the cases below:

– acting as the owner of the Company’s Internet sites and corresponding mobile applications (hereinafter collectively referred to as the “Sites”);

– registration and regulation of labor and other directly associated relations of the Company;

– conducting the Company’s ordinary business activities as a legal entity.

3.6 Specific conditions of processing, including purposes of personal data processing, categories of personal data subjects, as well as categories and list of processed personal data are provided in **Annexes A, B, C**.

3.7 Personal data are processed with the personal data subjects’ consent to the processing of their personal data, as well as without it in cases provided for by the legislation of the Russian Federation.

The forms of consent to the processing of personal data are provided in the annexes to this Policy:

– consent to the processing of employees’ personal data in form **ФП 038.01 (Annex D)**;

– consent to the processing of personal data for the purposes of access control and issuance of visitor passes according in form **ФП 038.02 (Annex E)**;

– consent to the processing of job applicants’ personal data in form **ФП 038.03 (Annex F)**;

– consent to video surveillance in the workplace in form **ФП 038.04 (Annex G)**.

3.8 The Company processes personal data only provided that at least one of the conditions is met and during the periods listed in **Table 1**.

Table 1 – Legal basis for personal data processing and periods of their processing and retention

Legal basis for personal data processing	Period of processing and retention of personal data
With the consent of the personal data subject to the processing of their personal data	During the period for which consent to the processing of personal data has been given. In case of uncertainty about the consent, the period of consent to the processing of personal data shall be limited to the achievement of the purpose of personal data processing
To achieve the goals stipulated by the international treaty of the Russian Federation or the law, to implement and fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation	Within the period of time established by the relevant international treaties or laws
When it is necessary to process personal data subject to publication or mandatory disclosure in accordance with the Federal Law	Within the period established by the relevant laws
To enforce a judicial ruling, enactment of another body or official that are subject to enforcement in accordance with the legislation of the Russian Federation on the enforcement proceedings	Within the period necessary for the enforcement of the relevant ruling
When a person participates in constitutional, civil, administrative, criminal proceedings, proceedings in arbitration courts.	During the period of participation in the relevant legal proceedings, including the period of appeal (contestation) of judicial acts, except for cases when a longer period of personal data processing is established by the current legislation of the Russian Federation
To perform a contract to which the personal data subject is a party or a beneficiary or guarantor, as well as to conclude a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor	During the validity of such contract, except for cases when a longer period of personal data processing is established by the current legislation of the Russian Federation
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	Until the moment when it becomes possible to obtain the consent of the personal data subject or when the relevant grounds threatening life, health or other vital interests cease to exist (whichever comes first)
To exercise the rights and legitimate interests of the operator or third parties, provided that the rights and freedoms of the personal data subject are not violated in this case	During the period necessary to exercise rights and ensure legitimate interests. The specific term shall be determined by the Company taking into account the provisions of this Policy, internal documents and local regulations of

Legal basis for personal data processing	Period of processing and retention of personal data
	the Company, as well as the principles of personal data processing and the requirements of the legislation of the Russian Federation, including with regard to the termination of personal data processing upon achievement of specific, predetermined, legitimate purposes of processing

3.9 For the purposes of personal data processing, the Company may transfer personal data to:

- the Company’s employees;
- third parties which have signed an obligation to ensure confidentiality and security of the received data under the Company’s instruction, and such document shall include a list of actions (operations) with personal data to be performed by the person processing personal data, specify the purposes of processing, establish the obligation of such person to maintain confidentiality of personal data and ensure security of personal data during their processing, and specify the requirements for the protection of processed personal data;
- at the request of the inquiry and investigation bodies, the court in connection with the investigation or court proceedings, at the request of the criminal-executive body in connection with the enforcement of criminal punishment and control over the behavior of a conditionally sentenced person, a convicted person in respect of whom the serving of the sentence is postponed, and a person released on parole.

When transferring personal data in electronic form to third parties via open communication channels, the Company shall take all necessary measures to protect the transferred information in accordance with the requirements of the current legislation of the Russian Federation in accordance with the procedure regulated by local regulations.

The statement of consent to the transfer of personal data by the operator to third parties shall be executed in form **ФП 038.05 (Annex I)**.

The consent to the processing of personal data authorized by the subject of personal data for dissemination shall be executed in form **ФП 038.06 (Annex J)**.

3.10 The Company is entitled to entrust the processing of personal data to third parties under contracts concluded with such parties. The contract with the persons which will be entrusted with the processing of personal data shall obligatory contain the conditions required by the legislation of the Russian Federation, including the list of actions (operations) to be performed with personal data and the purposes of processing, as well as provisions for ensuring the security of personal data, including the requirements not to disclose and not to distribute personal data without the consent of the subject of personal data, unless otherwise provided for by the legislation of the Russian Federation, as well as the following requirements in accordance with cl. 19 of the Law of Personal Data.

Third parties entrusted with personal data processing shall be obliged to comply with the principles and rules of personal data processing stipulated by the Law of Personal Data,

other laws and bylaws. At the same time, the Company as the operator shall be liable to the subject of personal data for the actions of such person.

When the legislation of the Russian Federation establish appropriate legal grounds, the Company is entitled to engage third parties to process received personal data and/or transfer received data to them, as well as receive data from them for the above purposes without additional consent of the subject of personal data, provided that the said third parties ensure confidentiality and security of personal data during processing.

It is allowed that these third parties process personal data with or without the use of automation, by mixed processing, as well as perform any actions of personal data processing which do not contradict the legislation of the Russian Federation.

3.11 By accepting the terms and conditions of this Policy, the user of the Company's Sites gives their consent to the transfer of personal data to third parties in order to ensure the smooth operation, analysis and improvement of the quality of the Company's Sites, increase the efficiency of the use of the Sites (including through improvement, customization, correction of errors, etc.).

3.12 The Company processes biometric personal data (information that characterizes physiological and biological features of a person on the basis of which their identity can be established) in accordance with the legislation of the Russian Federation.

3.13 The Operator does not process special categories of personal data concerning race, ethnical identity, political views, religious or philosophical beliefs, state of health, intimate life, except in cases provided for by the legislation of the Russian Federation.

3.14 If a particular person to which the Company transfers personal data is foreign and the transfer is made outside the Russian Federation (for example, to a buyer of goods with delivery outside the Russian Federation), the Company performs cross-border transfer of personal data. Such transfer shall be carried out by the Company in compliance with the requirements of the legislation of the Russian Federation, provided that there is an appropriate legal basis for the processing of personal data, and provided that Roskomnadzor is notified in accordance with the procedure provided for in Article 22 of the Law on Personal Data.

3.15 The Company may collect technical information when a user visits the Company's Sites or uses the Company's mobile application. The list of technical information: IP address, type of mobile device used, operating system and browser type, unique device identifier, address of referring websites, the path the user takes through the Company's website and mobile application, etc.

The Company may also use such technologies as cookies, web beacons and mobile device identifiers to collect information about the use of the Company's website and mobile service.

Using the Internet statistics services (Yandex Metrica and others), the Company records cookies on the customer's device, which the customer uses to fulfill their needs on the Company's websites.

The cookies allow the Company to provide users with relevant information as they use the Company's websites and mobile services (for example, to open and download relevant pages).

The web beacons allow the Company to recognize whether a particular page has been visited, whether an email has been opened, or whether advertising banners on the Company's websites have been effective.

The Company uses this information to ensure the performance of its website and mobile application, to improve the quality of services provided, to correct errors and to enhance the user experience in general. At the same time, the Company does not pursue the purpose of identifying (personalizing) a particular user of the Company's website or mobile application.

The Site visitor or client hereby consents to the collection, analysis and use of cookies, including by third parties for the purposes to generate statistics and optimize advertising messages.

To change the settings of cookies, the Site visitor may use the settings of their browser.

3.16 The Company shall keep personal data in a form that allows to identify the subject of personal data for no longer than required for the purposes of their processing, unless the retention period of personal data is established by the Federal Law or an agreement.

3.16.1 Personal data in hard copy shall be kept in the Company for the period of retention of documents for which such periods are stipulated by the legislation on archives in the Russian Federation.

3.16.2 The retention period of personal data processed in personal data information systems corresponds to the retention period of personal data on paper.

3.17 The Company stops processing personal data in the cases below:

- the fact of their unauthorized processing has been revealed. Deadline - within 3 (three) business days from the date of detection;
- the purpose of their processing has been achieved;
- the personal data subject's consent to the processing of the said data has expired or has been withdrawn, when, according to the Law on Personal Data, the processing of such data is allowed only with consent;
- liquidation of the Company or its reorganization resulting in termination of its activity.

3.18 When the purposes of personal data processing are achieved, as well as in case the subject of personal data withdraws their consent to processing of personal data, the Company shall stop processing such data:

- unless otherwise provided for in the contract to which the personal data subject is a party, beneficiary or guarantor;
- if the Company is not entitled to process such data without the consent of the subject of personal data on the grounds provided for by the Law on Personal Data or other Federal Laws;

- unless otherwise provided for by another agreement between the Company and the subject of personal data

3.19 If a personal data subject requests the Company to stop processing personal data the Company shall, within a period not exceeding 10 (ten) business days from the date of receipt of the relevant request by the Company, stop the processing of personal data, except for cases provided for by the Law on Personal Data. The specified term may be extended, but not more than for 5 (five) business days. For this purpose, the Company shall send a motivated notice to the personal data subject specifying the reasons for extending the term.

3.20 When collecting personal data, including through the information and telecommunications network Internet, the Company shall ensure recording, systematization, accumulation, storage, clarification (update, change), extraction of personal data of the citizens of the Russian Federation using databases located within the Russian Federation.

3.21 When processing the personal data, the Company shall:

- take measures necessary and sufficient to ensure compliance with the requirements of the Russian legislation, internal documents and local regulations of the Company in the field of personal data;

- take legal, organizational and technical measures to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data;

- appoint a person responsible for the organization of personal data processing in the Company;

- issue internal documents defining the Company's policy with regard to personal data processing, local acts on personal data processing, as well as local acts establishing procedures aimed at preventing and detecting violations of the Russian legislation and eliminating the consequences thereof;

- familiarize the Company's employees, its branches, representative offices and structural subdivisions directly involved in personal data processing with the provisions of the Russian legislation, internal documents and local regulations of the Company in the field of personal data, including the requirements to personal data protection, and train these employees;

- conduct regular mandatory trainings and classes for its employees on personal data issues;

- perform internal control and (or) audit of compliance of personal data processing with the requirements of the Russian legislation and regulatory legal acts adopted in accordance therewith, other requirements to personal data protection, this Policy, internal documents and local regulations of the Company in the field of personal data;

- provide access to this Policy;

- terminate processing of personal data and destroy it in cases provided for by the legislation of the Russian Federation;

- perform other actions provided for by the legislation of the Russian Federation in the field of personal data.

4 Updating, Amendment, Deletion, Destruction of Personal Data, Responses to Requests of Subjects for Access to Personal Data

4.1 Confirmation of the fact of personal data processing by the Company, legal grounds and purposes of personal data processing, as well as other information specified in part 7 of Article 14 of the Law on Personal Data shall be provided by the Company to the personal data subject or their representative within 10 (ten) business days of the application or receipt of the request of the personal data subject or their representative. This term may be extended, but not more than for 5 (five) business days. For this purpose, the Company shall send a motivated notice to the personal data subject indicating the reasons for extending the term for providing the requested information.

The information provided shall not include personal data relating to other personal data subjects, except for cases when there are legitimate grounds for disclosure of such personal data.

4.2 A person whose personal data is processed by the Company is entitled to:

– to revoke their earlier consent to the processing of personal data;

Note – Pursuant to part 2 of Articles 9, part 4 and 5 of Article 21 of the Law on Personal Data the Company is entitled to continue processing of personal data if there are other legal grounds.

– to obtain the information regarding the processing of personal data;

– to demand clarification of their personal data, their blocking or destruction if the personal data are incomplete, outdated, inaccurate, illegally obtained, not necessary for the stated purpose of processing, as well as to demand termination of personal data processing if the purpose of such processing has been achieved by the Company.

4.3 Unless another procedure of interaction between the Company and the personal data subject is stipulated by the relevant document between them (for example, an agreement or the text of the consent to personal data processing), in order to exercise the above rights, the personal data subject should send a request to the Company in one of the following ways:

– in writing and signed by handwritten signature to the following address: 8 Tolstogo Sq., Rostov-on-Don, Rostov region, Russia, 344037;

– in the form of an electronic document and signed by an electronic signature to e-mail: info_uk@grain.ru.

Such request shall in all cases contain a description of the personal data subject's requirements, as well as the following information:

– Full name of the personal data subject;

– number of the main identity document of the personal data subject or their representative, information about the date of issue of the said document and the issuing authority or other data enabling the personal data subject to be identified unambiguously;

– information confirming the personal data subject's participation in relations with the Company, or information otherwise confirming the fact of personal data processing by the Company;

– signature of the personal data subject or their representative.

4.4 If the request of the personal data subject does not contain all necessary information in accordance with the requirements of the Law on Personal Data or the subject does not have the right of access to the requested information, a reasoned refusal shall be sent to them.

The right of the personal data subject to access their personal data may be restricted in accordance with the Law on Personal Data, including if the access of the personal data subject to their personal data violates the rights and legitimate interests of third parties.

4.5 In the event that inaccurate personal data is revealed upon request of the personal data subject or their representative, the Company shall, at their request or at the request of Roskomnadzor, block personal data related to this personal data subject from the moment of such request or receipt of the said request for the period of verification, provided that the blocking of personal data does not violate the rights and legitimate interests of the personal data subject or third parties

If the fact of inaccuracy of personal data is confirmed, the Company shall, based on the information submitted by the personal data subject or their representative or Roskomnadzor, or other necessary documents, clarify the personal data within 7 (seven) business days from the date of submission of such information and remove the blocking of personal data.

4.6 In case of detection of unlawful processing of personal data upon the request of the personal data subject or their representative or Roskomnadzor, the Company shall block unlawfully processed personal data related to this personal data subject from the moment of such request.

The subject of personal data is entitled to appeal the Company's actions (inactions) and decisions violating their rights in the processing of personal data to the authorized body for the protection of the rights of personal data subjects (Roskomnadzor) and in court in accordance with the procedure established by the legislation of the Russian Federation.

4.7 If the Company, Roskomnadzor or any other interested party reveals the fact of unlawful or accidental transfer (provision, distribution) of personal data (access to personal data) resulting in violation of the rights of personal data subjects, the Company shall:

- notify, within 24 hours, Roskomnadzor about the incident, the alleged reasons that led to the violation of the rights of personal data subjects, the alleged harm caused to the rights of personal data subjects, and the measures taken to eliminate the consequences of the incident, as well as provide information about the person authorized by the Company to interact with Roskomnadzor on issues related to the incident;

- notify, within 72 hours, Roskomnadzor of the results of the internal investigation of the identified incident and provide information on the persons whose actions caused the incident (if any).

4.8 Procedure for destruction of personal data by the Company

4.8.1 Terms and conditions for destruction of personal data by the Company:

- within 30 days - when the purpose of personal data processing is achieved or when there is no longer a need to achieve this purpose;

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- within 30 days - when the maximum period of retention of documents containing personal data is expired;
 - within 7 (seven) business days - when the personal data subject (their representative) provides confirmation that the personal data were obtained illegally or are not necessary for the stated purpose of processing;
 - within 30 days - when the personal data subject revokes their consent to the processing of their personal data if the retention of personal data for the purpose of their processing is no longer required. The notification on deletion of personal data from the electronic database shall be made in form **ФП 038.07 (Annex K)**.

4.8.2. When the purpose of personal data processing is achieved, as well as in case the subject of personal data withdraws their consent to their processing, the personal data shall be destroyed, unless:

- otherwise provided for by the contract to which the personal data subject is a party, beneficiary or guarantor;
- the Company may not carry out processing without the consent of the personal data subject as provided for by the Law on Personal Data;
- otherwise provided for by another agreement between the Company and the subject of personal data.

4.8.3 Destruction from carriers and media containing personal data of subjects shall comply with the following rules:

- to be as secure and confidential as possible, with no possibility of later recovery;
- to be documented by an appropriate report in form **ФП 038.08 (Annex L)**;
- to be carried out by a commission on personal data destruction;
- destruction shall apply only to the personal data that is subject to destruction due to the achievement of the purpose of their processing or the loss of necessity to achieve it, preventing accidental or intentional destruction of the actual carriers.

The specific procedure for destroying personal data on media containing personal data, including external/removable electronic media, paper media and in personal data information systems is established by the Company in its internal documents and local regulations.

5 Information on Implemented Requirements to Personal Data Protection

5.1 The processing of personal data shall be performed by the Company's employees whose job description includes personal data processing in accordance with the document approved by the head of the Company. The commitment to non-disclosure of personal data shall be documented in form **ФП 038.09 (Annex M)**.

5.2 The Company processes personal data after:

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- personal data are received orally and (or) in writing directly from the personal data subjects themselves and (or) their representatives;
 - personal data are entered into the Company's logs, registers and information systems in electronic form;
 - personal data is received in other forms not contrary to the law.

5.3 The personal data is not allowed to be disclosed to any third parties or disseminated otherwise with the personal data subject's consent unless otherwise stipulated by the Federal Law.

5.4 The consent to the processing of personal data allowed by the personal data subject for dissemination shall be executed as a separate document other than the consents of the personal data subject to the processing of their personal data (**Annex J**).

5.5 The transfer of personal data to the inquiry and investigation bodies, the Federal Tax Service, the Social and Pension Insurance Fund of the Russian Federation and other authorized executive authorities and organizations shall be carried out in accordance with the requirements of the legislation of the Russian Federation.

5.6 When processing personal data, the Company takes all necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unlawful actions with regard to personal data. The Company regularly reviews and updates the measures taken to ensure the best protection of processed personal data - such measures are described in this Policy, internal documents and local regulatory acts of the Company.

5.7 Such measures include, but are not limited to:

- development of threat models;
- identification of threats to the security of personal data during their processing in personal data information systems;
- application of organizational and technical measures to ensure the security of personal data during their processing in personal data information systems, necessary to meet the requirements for personal data protection, the implementation of which ensures the levels of personal data protection established by the Government of the Russian Federation;
- application of information protection means that have passed the conformity assessment procedure in accordance with the established procedure;
- assessment of the efficiency of the measures taken to ensure personal data security before the personal data information system is put into operation;
- approval, signed by the sole executive body, of the list of persons whose access to personal data is necessary for the performance of their job duties;
- appointment of employee(s) responsible for ensuring personal data security in the information system or assigning the relevant duties to the respective structural unit;
- approval of local normative acts and other documents regulating relations in the personal data processing and protection;

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- organization of the security regime of the premises where the material carriers of personal data are located and the information systems of personal data are placed, preventing the possibility of uncontrolled penetration or stay in these premises of persons who are not authorized to access these premises;
 - detecting the facts of unauthorized access to personal data and taking measures;
 - recovery of personal data modified or destroyed due to unauthorized access to them;
 - establishing the rules of access to personal data processed in the personal data information system, as well as ensuring the registration and recording of all actions performed with personal data in the personal data information system;
 - control over the measures taken to ensure personal data security and the level of protection of personal data information systems;
 - accounting of machine carriers of personal data
 - organization of access and intra-object regimes on the Company’s territory;
 - placement of technical means of personal data processing within the protected area;
 - maintaining technical means of security, video surveillance, alarm system in constant readiness;
 - monitoring of users’ actions, conducting proceedings on the facts of violation of personal data security requirements.
 - familiarization of the operator’s employees directly involved in personal data processing with the provisions of the Russian legislation on personal data, including requirements to personal data protection, documents defining the operator’s policy on personal data processing, local acts on personal data processing;
 - storage of personal data in a form that allows to identify the subject of personal data for no longer than required by the purposes of personal data processing, unless the period of personal data storage is established by the Federal Law, agreement.

6 Legal Basis for Personal Data Processing

6.1 The legal basis for personal data processing by the Company is a set of regulatory legal acts, pursuant to and in accordance with which the Company processes personal data, including the following:

- Constitution of the Russian Federation;
- Civil Code of the Russian Federation;
- Labor Code of the Russian Federation;
- Tax Code of the Russian Federation;
- Federal Law No. 14-Φ3 “On Limited Liability Companies” dated 08.02.1998;
- Federal Law No. 402-Φ3 “On Accounting” dated 06.12.2011;
- Federal Law No. 167-Φ3 “On Compulsory Pension Insurance in the Russian Federation” dated 15.12.2001;
- Federal Law No. 323-Φ3 “On the Fundamentals of Public Health Protection in the Russian Federation” dated 21.11.2011;
- other regulatory legal acts governing relations associated with the Company’s activities.

6.2 The legal basis for the processing of personal data is also:

- the Company’s Charter;
- contracts entered into between the Company and personal data subjects;
- consent of personal data subjects to the processing of their personal data

7 Final Provisions

7.1 Other obligations and rights of the Company as an operator of personal data and a person organizing their processing on behalf of other operators are determined by the legislation of the Russian Federation in the field of personal data.

7.2 Officials and employees of the Company responsible for violation of the norms governing the personal data processing and protection shall bear material, disciplinary, administrative, civil or criminal liability in accordance with the legislation of the Russian Federation.

7.3 Day-to-day control of the procedure for handling personal data shall be exercised by the heads of those structural units of the Company where the personal data of the subjects are processed.

7.4 Regular control over the fulfillment of this Policy shall be assigned to the official responsible for personal data security appointed by the order of the Company’s head.

Annex A

Activities as the Owner of the Company’s Websites (on the Internet and in Relevant Mobile Applications)

Purpose of personal data processing	Categories of personal data subjects	List of personal data
1 Use, including visiting, the Company’s websites and relevant mobile applications (hereinafter jointly referred to as the “Sites”) in accordance with the provided functionality, including registration and authorization on the Sites	Users of the Company’s Sites (individuals with whom the Company intends to conclude or has concluded civil law contracts; representatives of legal entities and individuals with whom the Company intends to conclude or has concluded civil law contracts, etc.).	<ul style="list-style-type: none"> • User ID; • Surname, first name and patronymic; • Contact information (phone number, e-mail address, etc.); • Information on the use of the functionality of the Sites or other services of the Company; • Other data independently provided by persons to the Company (when filling in the information in personal accounts on the Sites or other services of the Company); • Information collected through metric programs, including technical information about user devices and identifiers (cookies, device geolocation, metadata, user IP address, etc.).

Purpose of personal data processing	Categories of personal data subjects	List of personal data
<p>2 Promotion of conclusion and performance of agricultural products supply contracts, coordination and signing of supply contracts and/or specifications for the supply of agricultural products via the Company's Sites</p>	<p>Individuals - parties to supply contracts or those who intend to enter into supply contracts (to sign a specification for supply) for agricultural products with the Company</p>	<ul style="list-style-type: none"> • User ID; • Surname, first name and patronymic; • Address of registration at the place of residence and address of actual residence; • Contact information (phone number, e-mail address, etc.); • Bank details; • Primary State Registration Number of the Individual Entrepreneur (OGRNIP) and Taxpayer Identification Number (INN) (if the person enters into a contract as an individual entrepreneur); • Passport details; • Information collected through metric programs, including technical information about user devices and identifiers (cookies, device geolocation, metadata, user IP address, etc.).
	<p>Representatives of legal entities/individuals who enter into and perform agricultural products supply contracts (signing the specification for supply) or intend to enter into such contracts</p>	<ul style="list-style-type: none"> • User ID; • Surname, first name and patronymic; • Position; • Details of powers of attorney; • Passport details; • Contact information (phone number, e-mail address, etc.); • Information collected through metric programs, including technical information about user devices and identifiers (cookies, device geolocation, metadata, user IP address, etc.).
<p>3 Search and selection of suppliers of goods/works/services through electronic tenders for the subsequent purchase of goods/works/services (conclusion of civil law contracts) by the Company at the most competitive prices</p>	<p>Individuals - participants of electronic tenders or those who plan to participate in electronic tenders</p>	<ul style="list-style-type: none"> • User ID; • Surname, first name and patronymic; • Contact information (phone number, e-mail address, etc.); • Taxpayer Identification Number (INN); • Other data independently provided by persons to the Company; • Information collected through metric programs, including technical information about user devices and identifiers (cookies, device geolocation, metadata, user IP address, etc.).
	<p>Representatives of legal entities/individuals who participate in electronic tenders or plan to participate in such tenders</p>	<ul style="list-style-type: none"> • User ID; • Surname, first name and patronymic; • Position; • Details of powers of attorney; • Passport details; • Contact information (phone number, e-mail address, etc.); • Information collected through metric programs, including technical information about user devices and identifiers (cookies, device geolocation, metadata, user IP address, etc.).

Purpose of personal data processing	Categories of personal data subjects	List of personal data
4 Arrangement of an electronic queue of motor vehicles used to deliver agricultural products and other goods to the Company	Drivers of vehicles who deliver agricultural products and other goods to the Company	<ul style="list-style-type: none"> • Surname, first name and patronymic; • Driver’s license details; • State registration plates of motor vehicle and trailer; • Phone number; • Information collected through metric programs, including technical information about user devices and identifiers (device geolocation, metadata, user IP address, etc.).
5 Sending advertising and informational messages (including via SMS messages, push notifications, e-mail and other means)	Recipients of advertisements and information messages who have previously consented to it	<ul style="list-style-type: none"> • User ID; • Surname, first name and patronymic; • Contact information (phone number, e-mail address, nicknames and IDs in messengers, social networks, etc.); • Other data independently provided by persons to the Company (as part of consent to receive advertising) - for example, specific preferences and interests to personalize the advertising and information messages received; • Information collected through metric programs, including technical information about user devices and identifiers (cookies, device geolocation, metadata, user IP address, etc.).
6 Quality control and improvement of the efficiency of the use of the Company’s Sites, as well as collection of statistics and other analytics in relation to the Sites	Users of the Company’s Sites	<ul style="list-style-type: none"> • User ID; • Surname, first name and patronymic; • Contact information (phone number, e-mail address, etc.); • Information on the use of the Company’s Sites features; • Information collected through metric programs, including technical information about user devices and identifiers (cookies, user IP address, device geolocation, metadata, etc.).

Annex B

Formalization and Regulation of Labor and Other Associated Relations by the Company

Purpose of personal data processing	Categories of personal data subjects	List of personal data
<p>1 Maintaining personnel document flow, including the formation, maintenance and storage of personnel files, employment record books and other personnel documents, as well as maintaining military and migration records at the Company</p>	<p>Employees; former employees; close relatives of employees, including those of former employees</p>	<ul style="list-style-type: none"> • Nationality; • Surname, first name and patronymic; • Sex; • Age; • Year, month, date and place of birth; • Identity documents (Passport details or details of another identity document); • Information contained in migration registration documents (in respect of individuals who are not citizens of the Russian Federation); • Address of registration at the place of residence and address of actual residence; • Contact information (mobile phone number, home phone number, fax number, e-mail address, mailing address); • Data of documents on education, qualification, professional training, information on professional development and other similar data; • Marital status, information on family composition and close relatives, which may be required by the Company to provide the employee with benefits provided for by the labor and tax legislation of the Russian Federation; • Information on military registration and information contained in military registration documents (with regard to individuals subject to military registration); • Information contained in the employment record book, information on employment history, previous jobs, income from previous jobs; • Taxpayer Identification Number (INN); • Individual Insurance Account Number (SNILS); • Bank details; • Information on hiring, transfer, dismissal and other events related to the employee's employment with the Company; • Information on income earned at the Company; • Information on judgement-based business and other personal qualities; • Biographical details; • Information on temporary incapacity for work and health status; • Photo image; • Information on the presence/absence of a criminal record; • Other data independently provided by the employee, including former employees, to the Company - for example, information on individual professional achievements

Purpose of personal data processing	Categories of personal data subjects	List of personal data
<p>2 Compliance with and fulfillment of the requirements of the current labor legislation of the Russian Federation (calculation and payment of wages and salaries, making other payments due under labor legislation, granting vacations, sending on business trips, bringing to disciplinary or material responsibility, etc.).</p>	<p>Employees</p>	<ul style="list-style-type: none"> • Nationality; • Surname, first name and patronymic; • Passport details or details of another identity document, including outside the Russian Federation (in case of business trips abroad); • Information about education, data of documents on education, qualification, professional training, information on professional development and other similar data; • Address of registration at the place of residence and address of actual residence; • Contact information (phone number, e-mail address, messenger ID, etc.); • Information contained in the employment record book, information on employment history, previous jobs, income from previous jobs; • Taxpayer Identification Number (INN); • Individual Insurance Account Number (SNILS); • Bank details; • Information on hiring, transfer, dismissal and other events related to the employee's employment with the Company; • Information on income earned at the Company; • Information on income from previous jobs; • Information on travel documents, hotel reservations and other information required by law and (or) necessary for organizing a business trip; • Information on judgement-based business and other personal qualities; • Information on temporary incapacity for work and health status; • Other self-reported data provided by the employee to the Company - for example, information on specific life circumstances which enable the Company to make payments due under labor law
<p>3 Control over the scope and quality of work performed</p>	<p>Employees</p>	<ul style="list-style-type: none"> • Surname, first name and patronymic; • Contact information (phone number, fax number, e-mail address, mailing address); • Information on hiring, transfer, dismissal and other events related to the employee's employment with the Company; • Information on judgement-based business and other personal qualities

Purpose of personal data processing	Categories of personal data subjects	List of personal data
4 Provision of various guarantees, benefits and compensations	Employees	<ul style="list-style-type: none"> • Nationality; • Surname, first name and patronymic, • Sex; • Age; • Date and place of birth; • Passport details or details of another identity document; • Address of registration at the place of residence and address of actual residence; • Contact information (phone number, fax number, e-mail address, mailing address); • Information on hiring, transfer, dismissal and other events related to the employee's employment with the Company; • Biographical details
5 Communication with employees and building of internal communications, including via e-mail, telephone or messengers, as well as by including employees in internal corporate directories of the Company	Employees	<ul style="list-style-type: none"> • Surname, first name and patronymic; • Sex; • Age; • Date of birth; • Contact information (phone number, e-mail address, etc.); • Information on hiring, transfer, dismissal and other events related to the employee's employment with the Company; • Information on judgement-based business and other personal qualities; • Photo image
6 Directing to any type of training both within the Company and to external companies, platforms, resources providing the relevant type of services	Employees	<ul style="list-style-type: none"> • Surname, first name and patronymic, • Nationality; • Sex; • Age; • Date of birth; • Passport details or details of another identity document; • Address of registration at the place of residence and address of actual residence; • Contact information (phone number, fax number, e-mail address, mailing address); • Data of documents on education, qualification, professional training, information on professional development and other similar data; • Taxpayer Identification Number (INN); • Individual Insurance Account Number (SNILS); • Information on hiring, transfer, dismissal and other events related to the employee's employment with the Company

Purpose of personal data processing	Categories of personal data subjects	List of personal data
<p>7 Inclusion in the personnel reserve, including with subsequent sending of information on vacancies and career events</p>	<p>Employees; former employees; applicants for the Company's vacant positions</p>	<ul style="list-style-type: none"> • Surname, first name and patronymic, • Year, month, date and place of birth, • Nationality; • Identity documents (Passport details or details of another identity document); • Taxpayer Identification Number (INN); • Individual Insurance Account Number (SNILS); • Addresses of actual place of residence and registration at the place of residence; • Contact information (postal and e-mail addresses, telephone numbers, etc.); • Information about education, profession, speciality and qualifications; • Information on marital status and family composition; • Information on previous positions held and length of service; • Information on military duty; • Information on attestation, advanced training and professional retraining; • Information on income earned at the Company (if any); • Information on judgement-based business and other personal qualities; • Other data independently provided by the applicant to the Company and contained in the applicant's CV or questionnaire
<p>8 Processing of information (including CVs) of applicants for a vacant position, including as part of the formalization and completion by the applicant of procedures preceding the decision to conclude an employment contract</p>	<p>Applicants for the Company's vacant positions</p>	<ul style="list-style-type: none"> • Surname, first name and patronymic; • Year, month, date and place of birth, • Nationality; • Identity documents (Passport details or details of another identity document); • Taxpayer Identification Number (INN); • Individual Insurance Account Number (SNILS); • Addresses of actual place of residence and registration at the place of residence; • Contact information (postal and e-mail addresses, telephone numbers, etc.); • Information about education, profession, speciality and qualifications; • Information on marital status and family composition; • Information on previous positions held and length of service; • Information on military duty; • Information on attestation, advanced training and professional retraining; • Other data independently provided by the applicant to the Company and contained in the applicant's CV or questionnaire

Annex C

The Company's Ordinary Business Activities as a Legal Entity

Purpose of personal data processing	Categories of personal data subjects	List of personal data
1 Conclusion, performance and termination of other civil law contracts with third parties	Individuals - parties to civil law contracts	<ul style="list-style-type: none"> • Nationality; • Surname, first name and patronymic; • Contact information (phone number, e-mail address, etc.); • Passport details or details of another identity document; • Address of registration at the place of residence and address of actual residence; • Bank details (for fee-based contracts only); • Registration number as an individual entrepreneur and other data contained in the Unified State Register and other open (public) registers (if the individual is also an individual entrepreneur); • Other data in accordance with the terms of contracts (if necessary)
	Representatives of parties to civil law contracts	<ul style="list-style-type: none"> • Surname, first name and patronymic; • Position; • Details of powers of attorney
2 Verification of the reliability of individuals with whom the Company intends to establish business relations (e.g., enter into a civil law contract)	Individuals with whom the Company intends to establish business relations	<ul style="list-style-type: none"> • Nationality; • Surname, first name and patronymic; • Contact information (phone number, e-mail address, etc.); • Passport details or details of another identity document; • Address of registration at the place of residence and address of actual residence; • Registration number as an individual entrepreneur and other data contained in the Unified State Register and other open (public) registers (if the individual is also an individual entrepreneur); • Information on the application of special taxation regimes (if the individual is also an individual entrepreneur); • Actual place of business activity (if such activity is carried out); • Bank details (If the business relationship to be established is of a remunerative nature); • Other data requested/received by the Company and reported/provided as part of the verification of reliability
3 Organization of admission and intra-site regimes,	Visitors to the Company's territory,	<ul style="list-style-type: none"> • Surname, first name and patronymic; • Passport details or details of another identity document;

Purpose of personal data processing	Categories of personal data subjects	List of personal data
ensuring security of visitors on the territory of the Company	including the Company's employees	<ul style="list-style-type: none"> • Contact information (phone number, e-mail address); • Photo and video images; • State registration plate of a vehicle.
4 Issuance of powers of attorney to the Company's representatives	Potential Company's representatives, including the Company's employees	<ul style="list-style-type: none"> • Surname, first name and patronymic; • Position (for the Company's employees); • Passport details or details of another identity document; • Other information to be included in a power of attorney in accordance with the terms of such power of attorney
5 Compliance and fulfillment of other requirements of the current legislation of the Russian Federation (accounting and tax accounting, organization of document flow and archival storage, sending information to state authorities, fulfillment of requirements and instructions of state authorities, execution of judicial acts, consideration of applications of personal data subjects, consumers, etc.).	All categories of personal data subjects, as specified above, to the extent that the relevant requirements of Russian legislation apply to them (e.g., storage of personal data as part of a contract for accounting purposes); Other subjects of personal data who interact with the Company in any way within the scope of the stated purpose	<ul style="list-style-type: none"> • All personal data pertaining to a specific category of personal data subjects, as specified above, to the extent that the relevant requirements of the legislation of the Russian Federation are applicable to them; • Other data independently provided by personal data subjects to the Company - for example, as part of a relevant request or claim

List of Annexes and Records

Annex and record identifier	Description of record/ annex	Subdivisions responsible for			Delivery method	Retention period
		completion	use	retention		
Annex A	Activities as the owner of the Company's Websites (on the Internet and in relevant mobile applications)	-	-	-	-	-
Annex B	Formalization and regulation of labor and other associated relations by the Company	-	-	-	-	-
Annex C	The Company's ordinary business activities as a legal entity	-	-	-	-	-
Annex D* ΦΠ 038.01	Form of consent to the processing of employees' personal data	Employee	Employer	Division in charge of HR management	On paper	3 years after the expiration of the consent or its withdrawal, unless otherwise provided for by federal law, the contract
Annex E* ΦΠ 038.02	Form of consent to the processing of personal data for the purposes of access control and issuance of visitor passes	Visitor	Employer	Department in charge of issuing visitor passes	On paper	1 year after the expiration of the consent or its withdrawal, unless otherwise provided for by federal law, the contract
Annex F* ΦΠ 038.03	Form of consent to the processing of job applicants' personal data	Job applicant	Employer	Department in charge of staff recruitment	Email/ On paper	Prior to the expiration of 30 days from the date of denial of employment
Annex G* ΦΠ 038.04	Form of consent to video surveillance in the workplace	Employee	Employer	Division in charge of HR management	On paper	3 years after the expiration of the consent or its withdrawal, unless otherwise provided for by federal law, the contract
Annex I* ΦΠ 038.05	Form of statement of consent to the transfer of personal data by the personal data operator to third parties	Employee	Employer	Division in charge of HR management	On paper	3 years after the expiration of the consent or its withdrawal, unless otherwise provided for by federal law, the contract
Annex J* ΦΠ 038.06	Form of consent to the processing of personal data allowed by the personal data subject for dissemination	Employee	Employer	Division in charge of HR management	On paper	3 years after the expiration of the consent or its withdrawal, unless otherwise provided for by federal law, the contract
Annex K* ΦΠ 038.07	Form of notification on deletion of personal data from the electronic database	Employee	Employer	Division in charge of HR management	Email/ On paper	3 years from the date of deletion of personal data from the electronic database
Annex L* ΦΠ 038.08	Form of report on destruction of personal data	Commission members	Employer	Chairman of the Commission	On paper	3 years from the date of destruction of personal data
Annex M* ΦΠ 038.09	Form of commitment to non-disclosure of personal data	Operator	Employer	Division in charge of HR management	On paper	According to legal requirements

Annex and record identifier	Description of record/ annex	Subdivisions responsible for			Delivery method	Retention period
		completion	use	retention		
<p>* The record forms are for internal use and are available on the corporate website in the “Internal Regulatory Documents” section at the following link: https://kiu.yugrusiagro.ru/vndoc/reestr</p>						

