

# Pskov Plant Titan-Polymer Limited Company

## POLICY ON PERSONAL DATA PROCESSING

### 1. General provisions

1.1. This document defines the policy of Pskov Plant Titan-Polymer Limited Company (hereinafter, the Company) with regard to personal data processing of website users and sets forth the system of basic principles applicable to personal data processing within the Company.

1.2. This Policy applies to all operations performed in the Company with personal data using automation tools or without using them.

1.3. This Policy is binding familiarization and execution on all persons authorized to process personal data within the Company and on those involved in the organisation of the processing and security of personal data of the website users within the Company.

1.4. This Policy has been developed in accordance with current legislation of the Russian Federation and is subject to update in the event of changes in the legislation of the Russian Federation on personal data.

### 2. Principles and conditions for personal data processing within the Company

2.1. Information included in personal data is any information relating to a directly or indirectly identified or identifiable natural person (personal data subject).

2.2. All personal data of website users processed by the Company is confidential, strictly protected information in accordance with the law.

2.3. As security for its duties as an operator, the Company processes the following personal data required for the proper performance of contractual obligations: personal data of natural persons, including, but not limited to, those in a contractual, apprentice or civil law relationship with the operator.

2.4. Personal data is processed by Pskov Plant Titan-Polymer Limited Company for the purposes of obtaining information about the implemented project by interested parties, as well as for collecting applications submitted by prospective employees of the company. Moreover, personal data may be processed by the Company to arrange and hold (including engagement of third parties) loyalty programs, marketing and/or promotion events, studies, surveys and other events; to provide other services to personal data subjects; to promote services and/or products of the Company and/or Company's partners in direct contact with customers of the Company by various means, including but not limited to, by telephone, e-mail, postal mailing, on the Internet; for other purposes if the actions of the Company are legal under the laws in effect

2.5. The company performs processing personal data in a legal and equitable way.

2.6. When processing personal data, its accuracy, sufficiency and, where appropriate, relevance with respect to the purposes of personal data processing shall be ensured.

2.7. The Company does not disclose or distribute personal data to the third parties without the consent of the personal data subject (unless otherwise provided for by the applicable laws of the Russian Federation).

2.8. The Company does not make decisions resulting in legal consequences for the personal data subject or otherwise affecting his rights and legitimate interests.

2.9. The company performs processing personal data using automation tools or without using them.

2.10. The company stops processing personal data in the following cases:

- upon achievement of its processing goals or in case there is no further need to achieve these goals;
- upon the request of the personal data subject, if the personal data processed by the Company is incomplete, out of date, inaccurate, illegally obtained or unnecessary for the stated purpose of processing;
- in case of unauthorized personal data processing, if lawfulness of personal data processing is impossible to be ensured;
- in case of withdrawal of the consent for personal data processing by the data subject; in case of winding up of the Company.

3. Rights and obligations of the personal data subject

3.1. The personal data subject has the right to:

- request the clarification, blocking or destruction of his/her personal data, if the personal data is incomplete, out of date, inaccurate, illegally obtained or unnecessary for the stated purpose of processing;
- request a list of his/her personal data processed by the Company and the source of the data;
- require notification of all persons who have previously been informed of incorrect or incomplete personal data, of any exclusions, emendations or alterations of such data or amendments thereto;
- to protect his/her rights and legitimate interests.

4. Rights and obligations of the Company

4.1. As a personal data processor Pskov Plant Titan-Polymer Limited Company is entitled to:

- protect its interests in court;
- provide personal data on subjects to the third parties as required by the applicable legislation;
- refuse to provide personal data in cases provided by the applicable legislation;
- use the subject's personal data without his or her consent in cases provided by the applicable legislation.

5. Final provisions

5.1. This Policy is to be posted on the official website of Pskov Plant Titan-Polymer Limited Company.

5.2. Control over satisfying the requirements of this Policy is exerted by the person responsible for ensuring the personal data security of Pskov Plant Titan-Polymer Limited Company.