



# Privacy Policy

*effective from July 01, 2017 as amended on 02 March 2020, 23 October 2020 and 15 May 2023*

This Policy on Personal Data Processing and Protection (hereinafter referred to as the "Policy") has been adopted and is valid in the ICL Group companies<sup>1</sup>:

- ▶ ICL-KME CS JSC,
- ▶ GDC Services LLC,
- ▶ NPO VS LLC,
- ▶ NPO VS-PRO LLC,
- ▶ ICL Techno LLC,
- ▶ ICL Electronics LLC,
- ▶ ICL ST LLC,
- ▶ ICL Soft LLC,
- ▶ ICL RS LLC,
- ▶ ICL Services LLC,
- ▶ ICL SV LLC,
- ▶ ICL Zapad LLC

(each entity individually, the "Company" or "we").

We collect, use and protect the personal data you provide us with when using our websites <http://icl-services.com/>, <http://icl-soft.ru/>, <http://cloud.icl-services.com/>, <http://icl.ru/>, <http://icl-techno.ru/>, <http://www.npo-vs.ru/>, as well as other websites owned by the ICL Group companies or third party websites used by us to collect personal data (hereinafter referred to as "websites"), or by sending it to the email addresses in the domains icl-services.com, icl.kazan.ru, as well as to the official accounts of the Company in social networks, by contact telephone numbers, from any device and when communicating with us in any form in accordance with this Policy.

***By using our websites and providing us with your personal data, you consent to the processing of your personal data in accordance with this Policy.***

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<sup>1</sup> The list is not exhaustive. It may include other organizations of the ICL Group companies, newly created or reorganized after the publication of this Policy, in the interests of which personal data of website visitors or other persons is collected.

## 01. Definitions

"**Personal data**" means any information relating directly or indirectly to an identified or identifiable individual (personal data subject).

"Personal Data Processing" means the performance of any activity or set of activities with respect to your personal data, including the collection, recording, systematization, accumulation, storage, updating and modification, extraction, use, transfer (provision, access), depersonalization, blocking, deletion and destruction, with or without the use of automated personal data processing systems.

## 02. The data we collect

We're collecting:

- ▶ The personal information you provide us with when you fill in the information fields on our websites, including when you fill out the contact form, subscribe to the newsletter, and register for events, getting access to access to the personal account, when taking surveys;
- ▶ Personal data contained in curriculum vitae that you submit to us when you respond to vacancies posted on our websites or when you recommend friends for such vacancies.
- ▶ The technical data that is automatically transmitted by the device that you use to use our websites, including the device specifications, IP address, location, information stored in the cookies that have been sent to your device, browser information, date and time of access to the website, addresses of requested pages and other information of that kind;
- ▶ The contact information you provide when you contact us in person or communicate with us by phone, email or social media;
- ▶ Personal information that your organisation provides when establishing a business relationship with us.

We may also use:

- ▶ Personal data from publicly available sources, such as information on your organisation's website, your public profile on social networks.

## 03. What we collect data for and how we process it

We process your personal data only for the purposes for which it was provided:

<i>Purpose</i>	<i>Legal basis</i>	<i>Data to be processed</i>	<i>Category of data subjects</i>	<i>Timeframe for processing and storage</i>
▶ communication with you when you contact us to provide you with information about the Company, our services and activities, projects;	Your consent to the processing of personal data in the form of conclusive actions	Name, Surname, Contact phone number, E-mail, Company, Job title	Representatives of prospective counterparties	The processing of personal data is determined by the achievement of the purposes for which the personal data was collected, the expiration of the consent or withdrawal of consent, as well as the detection of unlawful processing of personal data.
▶ organising your participation in our events and surveys;	Your consent to the processing of personal data in the form of conclusive actions	Name, Surname, Contact phone number, E-mail, Company, Job title	Event participants	
▶ send you our newsletters or	Your consent to the processing of	Name, contact details	Subscribers	

information about open vacancies;	personal data in the form of conclusive actions			
▶ consideration of your candidacy for employment in our Company for current or future vacancies in the Company;	Your consent to the processing of personal data in the form of conclusive actions	Full name, E-mail, phone number, city of residence, nationality, CV details	Applicants	
▶ consideration of your recommendation of a candidate for employment in our Company and payment of bonuses to you for a successful recommendation;	Your consent to the processing of personal data in the form of conclusive actions	Name, contact details	Recommenders	
	The processing of personal data is necessary for the performance of a contract with you	Full name, E-mail, details of an identity document, TIN, Insurance Personal account number, bank account/card details		
▶ registering a personal account on our websites;	Your consent to the processing of personal data in the form of conclusive actions	Full name, Job title, Name of organisation, Login, E-mail, Phone number	Representatives of suppliers and subcontractors, including potential	
▶ carrying out the due diligence procedure;	the processing of personal data is necessary for the exercise of the operator's rights and legitimate interests	Full name, Job title, Name of organisation, Identity document details	Representatives of prospective counterparties	
▶ establishing an opportunity to contact you and direct marketing.	the processing of personal data is necessary for the exercise of the operator's rights and legitimate interests	Name, contact details	Representatives of prospective counterparties	

We process technical data when you visit the websites, for:

- ▶ Ensuring the operation and security of our websites;
- ▶ Improving the quality of our websites.

We do not share your personal information with the public. We do not make decisions that have legal consequences for you or otherwise affect your rights and legitimate interests based solely on automated processing of personal data.

Your personal data may be transferred to government or other authorities for the purpose of complying with legal requirements; and to the Company's contractors for the purposes defined above (for example, to provide you with access to our events and surveys) on the basis of data transfer agreements and on ensuring its security during processing. The Company is responsible for the transfer of your personal data to the third parties.

## 04. Your rights

Ensuring the protection of your rights and freedoms in the field of personal data is an important condition for the Company's operations.

To ensure that your rights and freedoms are protected, we will do so at your request:

- ▶ We will confirm whether we process your personal data and give you the opportunity to review it within 10 days of receiving your request;
- ▶ We will inform you of the source and composition of your personal data that we process;
- ▶ We will inform you of the legal basis, purpose, timing and methods of processing your personal data;
- ▶ We will make the necessary changes to your personal data if you confirm that it is incomplete, inaccurate or outdated within 7 working days of receiving the confirmation and notify you of the changes;
- ▶ We will inform you of the name and location of the organisations that have access to your personal data;
- ▶ We will inform you of the name or surname, first name, patronymic and address of persons to whom your personal data may be processed with your consent;
- ▶ We will inform you of the procedure for exercising your rights when we process your personal data;
- ▶ We will exclude you from our newsletter;
- ▶ We will stop processing your personal data within 30 days from the date of receipt of the withdrawal of consent, unless there are other legal grounds for processing personal data provided by the legislation of the Russian Federation;
- ▶ We will stop processing your personal data if it is confirmed that we are processing it unlawfully and will notify you of the measures taken;
- ▶ We will destroy your personal data if it is confirmed that it has been illegally obtained or does not meet the stated purpose of processing, within 7 working days from the date of receipt of the relevant confirmation, and will notify you of the measures taken;
- ▶ We will answer your questions regarding your personal data that we process.

## 05. How you can contact us

You can contact us with a request regarding the processing of your personal data by sending us a letter with the subject "Request for personal data" (or "Withdrawal of consent to processing of personal data" in case of withdrawal of consent to processing of personal data) to the following e-mail address: [privacy@icl-services.com](mailto:privacy@icl-services.com) or to the address: 420029, Kazan, Sibirskiy trunk, 34, building 1.

## 06. Privacy of personal data

In order to ensure the security of your personal data during its processing, we take the necessary and sufficient legal, organizational and technical measures to protect your personal data from unauthorized or accidental access, deletion, modification, blocking, copying, provision, distribution, as well as other illegal actions in relation to personal data.

In order to ensure adequate protection of your personal data, we carry out an assessment of the harm that may be caused in the event of a breach of the security of your personal data, as well as identify current threats to the security of your personal data when processing it on our websites and in our internal personal data information systems.

In particular, when processing personal data in information systems, the following protection measures are implemented:

- ▶ The level of protection of personal data is determined;
- ▶ We comply with the requirements for the protection of personal data in information systems in accordance with certain levels of security;
- ▶ We apply the necessary data protection measures;
- ▶ Accounting of personal data carriers is carried out;
- ▶ Detection of the facts of unapproved access to the personal data and acceptance of necessary measures is carried out;
- ▶ Rules of access to the personal data processed in information systems are established, and also registration of the actions made with the personal data where it is necessary is provided;
- ▶ The measures taken to ensure the security of personal data and the level of security of information systems are controlled.

Employees of the Company who have access to personal data are familiar with this Policy and local acts on personal data security.

## 07. Cross-border transfer of personal data

We do not transfer your personal data collected through our websites to foreign countries. Our websites are hosted in the Russian Federation.

## 08. Termination of personal data processing

We will stop processing your personal data:

- ▶ upon the occurrence of the conditions for termination of processing of personal data or upon the expiration of the established terms;
- ▶ upon achieving the purposes for which they are processed or in the event that they are no longer necessary to achieve those purposes;
- ▶ upon your request, if the personal data being processed are illegally obtained or are not necessary for the stated purpose of processing;
- ▶ in case of detection of illegal processing of personal data, if it is impossible to ensure the lawfulness of processing;
- ▶ in case of withdrawal of your consent to the processing of personal data, if for processing of personal data there will be no other legal grounds provided by the legislation of the Russian Federation;
- ▶ in case of liquidation of the Company.

## 09. Cookies

We use **cookies**. Cookies are small text files placed on your device's hard drives while you are using different sites.

Cookies reflect your preferences or activities on the site, as well as information about the user's equipment, date and time of visit.

Our websites may process the received data cookies, including by using metrics software such as Yandex.Metrica.

Most browsers allow you to opt out of receiving cookies and remove them from your device's hard drive. If you wish, you can reject or delete the saved cookies from your hard drive in the browser settings of your device.

## 10. Links to third party websites

Our websites may contain links to third party sites and services that we do not control. We are not responsible for the security or privacy of any information collected by third party sites or services.

## 11. Changes to this Policy

We may update the Policy as necessary, for example, when legal requirements or the purposes for which we process personal data change. We recommend that you periodically check the relevance of this Policy, but in any case, each new edition will not diminish your rights compared to the previous one.

This Policy is effective as of 01 July 2017, as amended on 02 March 2020, 23 October 2020 and 15 May 2023.

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If you have any questions regarding this Policy, please contact us by sending a letter to the e-mail address [privacy@icl-services.com](mailto:privacy@icl-services.com) or to the address: 420029, Kazan, Siberian road, 34, building 1.