



PRIVACY POLICY

effective from July 1, 2017 as amended by March 2, 2020

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:

- ▶ JSC "ICL - KPO VS" located at the following address: 34, Sibirsky trakt, Kazan, 420029
- ▶ GDC Services LLC, located at: 422616, Republic of Tatarstan, Laishevskiy district, Usady village, 42, Dorozhnaya street, building 2, office 835
- ▶ NPO VS LLC, located at: 30, Journalists Street, 30, Kazan, 420088
- ▶ LLC ICS Techno, located at: 422616, Tatarstan Republic, Laishevsky district, Usadi, 42, Dorozhnaya street
- ▶ ITS System Technologies LLC, located at: 422616, Tatarstan Republic, Laishevskiy district, Usady village, 42, Dorozhnaya street, building 2, office 708
- ▶ JSC KPO VS, located at: 34, Sibirsky trakt, Kazan, 420029, Building 1.
- ▶ ICL Soft LLC, located at: 422616, Tatarstan Republic, Laishevskiy district, Usady village, 42, Dorozhnaya street, building 1.
- ▶ ICL RS LLC, located at the address: 422616, Tatarstan Republic, Laishevsky district, Usady village, 42, Dorozhnaya street, building 1, office 108
- ▶ ICL Services LLC, located at: 117630246, Moscow, Scientific-Starokaluga Highway, 5817, room 4-32
- ▶ ICL SV LLC, located at: 690088, Primorsky Krai, Vladivostok, 26A Zhigura St., office 56.

(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/> (hereinafter referred to as "websites") from any device and when communicating with us in any form in accordance with this Policy.

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

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 (distribution, provision, access), depersonalization, blocking, deletion and destruction, with or without the use of automated personal data processing systems.

02. The data we collect:

- ▶ 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;
- ▶ 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.

03. Data processing purposes

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

- ▶ providing you with information about the Company, our services and activities, projects and vacancies;
- ▶ communicating with you when you contact us;
- ▶ organising your participation in our events and surveys;
- ▶ sending you our news and information about open vacancies;
- ▶ considering your candidacy (or those you recommend) for employment with our Company for current or future vacancies.

We process technical data 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 30 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 and to which your personal data may be disclosed with your consent;
- ▶ 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 or to the address: 34, Sibirsky trakt, Kazan, 420029, 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.

The ICL Group has adopted local regulations on personal data security. 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.

Unless explicitly stated otherwise, your consent to the processing of personal data is effective from the moment of submission for an indefinite period of time.

09. Cookies

We use cookies. Cookies are small text files placed on your device's hard drives while you are using different sites to help you customize the user interface to your preferences.

Most browsers allow you to opt out of receiving cookies and remove them from your device's hard drive.

10. Links to third party websites

Our sites 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. We recommend that you periodically check the relevance of this Policy.

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If you have any questions regarding this Policy, please contact the Responsible Person for organizing the processing of personal data in the Company by sending a letter with the subject "Request for personal data" to the e-mail address privacy@icl-services.com or to the address: 34, Sibirsky trakt, Kazan, 420029, building 1.