



Siberian Agrarian Group
Joint Stock Company

APPROVED BY
Order of the Chairman of the Management Board

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**REGULATIONS ON
CUSTOMER PERSONAL DATA**

II-CAГ-14-020-2021

Revision 1

Tomsk

1. Purpose

1.1 These Regulations establish the procedure for the processing of customer personal data using the Internet website(s) of Sibagro JSC and the site(s) of Sibagro JSC Holding enterprises.

1.2 The procedure of customer personal data processing is aimed at ensuring the observance of legal rights and interests of Holding enterprises and customers of Holding enterprises, protection of human rights and freedoms, including protection of rights to privacy, personal and family secrets, in connection with the need to obtain (collect), systematize (combine), store and transfer information constituting personal data.

1.3 The main objectives of these Regulations are as follows:

- To establish uniform requirements for the procedure of obtaining (collecting), systematizing (combining), storing and transferring information that constitutes customer personal data.
- To ensure protection of the observance of legal rights and interests of Holding enterprises and employees of Holding enterprises when processing customer personal data.
- To prevent possible negative consequences when processing customer personal data.

2. Scope of application

2.1 These Regulations apply to all enterprises of the Holding.

2.2 The requirements of these Regulations are obligatory for all structural divisions and employees of Holding enterprises participating in customer personal data processing.

2.3 Any Holding enterprise may approve its own Regulations on customer personal data. In this case employees of this enterprise shall be guided by the requirements of the Regulations approved by the enterprise. However, the provisions approved by Holding enterprises should not contradict these Regulations.

3. Terms and abbreviations

3.1 The following terms and definitions are used in these Regulations:

Company (Holding enterprise(s)) - an enterprise of Sibagro JSC Holding in accordance with the latest version of corporate standard "Management of internal regulatory documents", CТII-CAГ-19-008.

Customer - an individual, subject of personal data.

Website - a set of software and hardware that provides for the publication of data on the Internet in open view. The website is available by a unique electronic address or letter designation. It may contain graphic, text, audio, video, as well as other information reproduced using a computer.

Personal data - any information relating directly or indirectly to a particular or identifiable individual (personal data subject).

Customer personal data processing - any action (operation) or set of actions (operations) with personal data performed using automation tools or without using such tools, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction of personal data.

Provision of personal data - actions aimed at disclosing customer personal data to a specific person or a certain circle of persons.

Blocking of personal data - temporary suspension of personal data processing (unless the processing is necessary to clarify personal data).

Destruction of personal data - actions, as a result of which it becomes impossible to restore the content of personal data in the personal data information system and/or as a result of which the material carriers containing personal data are destroyed.

Anonymization of personal data - actions that make it impossible to determine the belonging of personal data to a specific person without the use of additional information.

Information - information (messages, data) regardless of the form of its presentation.

Documented information - information recorded on a tangible medium containing requisites that make it possible to determine such information or its tangible medium.

3.2. The following abbreviations are used in these Regulations:

- **HO** - Sibagro JSC head office.
- **MCT** - means of computer technology.

4. Processing of customer personal data

4.1. The immediate source of information about customer personal data is the customer. In case personal data can only be obtained from a third party, then the Company shall be notified in advance in writing of this.

Personal data can be stored in electronic format on the territory of the Russian Federation.

The Company is not responsible to the customer for personal data transferred to third parties when moving from the Company's website to other websites and/or Internet web-pages through advertising widgets and other hyperlinks leading outside the Company's website.

4.2. The Company is not entitled to receive and process customer personal data concerning their race, nationality, political views, religious and philosophical beliefs, health status, and intimate life.

4.3. The Company is entitled to process customer personal data only with the customer's consent.

Customer personal data shall be processed with customer's consent. Customers entering data in the feedback form on the Company's website in order to obtain the necessary information thereby express their full consent in accordance with the provisions of the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data" for automated processing, as well as processing without the use of automation tools and for the use of their personal data.

4.4. The Company may collect and process the following personal data:

- Biographical details (last name, first name, middle name, date, month, year of birth, etc.).
- Passport information.
- Registration address.
- Residential address.
- Phone number;
- E-mail.
- Other data provided by the customer.

Automatically collected data:

- IP address, cookies.
- Information about the customer's browser, technical specifications of the hardware and software used by the customer.
- Date and time the website was accessed, addresses of the requested pages and other similar information.

4.5. The customer's consent is not required in the following cases:

- Personal data is processed on the basis of the federal law establishing the purpose of processing, conditions for obtaining personal data and the range of subjects whose personal data are subject to processing, as well as a certain authority of the Company.
- Processing of personal data for the purpose of contract execution.
- Processing of personal data is carried out for statistical or other scientific purposes, subject to mandatory depersonalization of personal data.
- Processing of personal data is necessary to protect the life, health or other vital interests of customers, if it is impossible to obtain their consent.

4.6. Customers provide the Company with reliable information about themselves.

4.7. In order to ensure the rights and freedoms of a person and a citizen, the head of the Company, as well as employees of the Company admitted to customer personal data on the basis of the order of the Company, when processing customer personal data shall comply with the following general requirements:

- Processing of personal data may be carried out solely for the purpose of ensuring compliance with laws or other legal acts, monitoring the quantity and quality of work performed and ensuring the safety of property.
- When determining the volume and content of processed personal data, the Company shall be guided by the Constitution of the Russian Federation and other federal laws.
- When making decisions affecting the customer's interests, the Company may rely on the personal data obtained about them exclusively as a result of their automated processing or electronic receipt.
- Protection of customer personal data from their unlawful use and loss is ensured by the Company at its expense in the manner prescribed by federal law.
- In all cases the customer's waiver of their rights to preserve and protect secrets is invalid.

5. Transfer of customer personal data

5.1. When transferring personal data of a customer, the Company shall:

- Not disclose personal data to a third party without a written consent of the customer, except for cases when it is necessary in order to prevent a threat to the life and health of the customer, as well as in cases established by federal laws.
- Not disclose personal data of a customer for commercial purposes without their consent. The processing of customer personal data in order to promote goods, works, services on the market by making direct contacts with a potential consumer using communication means is allowed only with their prior consent.
- Inform persons who received customer personal data that these data can be used only for the purposes for which they were communicated, and claim these persons to confirm that this rule has been observed. Persons who received customer personal data are required to comply with the confidentiality regime.
- Allow access to customer personal data only to specially authorized persons, while these persons should have the right to receive only those personal data that are necessary to perform a specific function.
- Not request information about the customer's health, with the exception of information related to the issue of the customer's ability to perform their obligations.
- Transfer customer personal data to their legal, authorized representatives in the manner prescribed by law and limit this information only to those personal data that are necessary for the specified representatives to perform their functions.

5.2. Customer personal data are processed and stored at the Company's location address.

5.3. Customer personal data can be obtained, undergo further processing and transferred to storage both in paper form and in electronic form (via a local computer network).

6. Access to customer personal data

6.1. The following persons may get access to customer personal data:

- The head of the Company.
- Heads of structural divisions of the Company according to the field of concern.

6.2 Customer personal data are stored in electronic form, as well as, if necessary, on paper.

6.3. Personal documents are stored in safes of the divisions responsible for maintaining and storing such documents.

6.4. The premises in which customer personal data are stored shall be equipped with locking devices. Access to the MCT used to process personal data shall be protected by passwords.

6.5. The customer is entitled to:

6.5.1. Access and review their personal data, including the right to receive a copy of any record containing their personal data free of charge.

6.5.2. Claim the Company to clarify, exclude or correct incomplete, incorrect, outdated, inaccurate, illegally obtained or not necessary for the Company personal data.

6.5.3. Receive from the Company:

– Information about persons who have access to personal data or who can be provided with such access.

– The list of processed personal data and the source of their receipt.

– Terms of processing personal data, including terms of their storage.

– Information regarding legal consequences for the subject of personal data that may entail their personal data processing.

6.5.4. Appeal unlawful actions or inaction of the Company when processing and protecting their personal data to the authorized body responsible for the protection of rights of personal data subjects or to a court.

6.5.5. It is allowed to copy and make extracts of customer personal data exclusively for official purposes with the written permission of the head of the Company.

6.5.6. Information about customer personal data is classified as confidential (constituting a legally protected secret of Sibagro JSC Holding enterprises).

6.5.7. The confidentiality regime in relation to customer personal data is removed:

- In case of its depersonalization.
- After 75 years of storage.
- In other cases stipulated by federal laws.

7. **Responsibility**

7.1. Employees of the Company guilty of violating the procedure for handling personal data shall be liable in accordance with the current legislation of the Russian Federation.

7.2. The person responsible for making changes to these Regulations on the basis of the data provided by responsible persons is the head of the Control and Legal Department of the HO.

7.3. Persons responsible for initiating and providing information to update the established requirements contained herein are:

– Heads of supply services, director of the Department of Wholesale and Corporate Sales, Deputy Chairman of the Board for Communications of Sibagro JSC HO.

7.4. Responsibility for the implementation and compliance with the requirements of the Regulations rests with the heads of Sibagro JSC Holding enterprises.

8. **References**

These Regulations contain references to the following regulatory documents:

8.1 External regulatory documents in force:

- Federal Law "On Personal Data" dated July 27, 2006 No. 152-FZ as at present in force.

8.2 Internal regulatory documents in force:

- Corporate standard "Management of internal regulatory documents", CТII-CAГ-19-008.

DEVELOPED BY:

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