

**APPROVED by**

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## **PERSONAL DATA PROCESSING POLICY STATEMENT**

**P-SM-03.DKZ-63-2021**

### **1 Scope of regulation**

1.1 The Personal Data Processing Policy Statement (hereinafter referred to as the Policy Statement) determines the policy of “Titan-Agro” Ltd (hereinafter referred to as the Company) relative to the processing of personal data aimed at preventing violations of the legislation of the Russian Federation, rights and freedoms of citizens associated with the processing of personal data.

1.2 The Policy Statement covers all types of activities of the Company, connected with the processing of personal data.

1.3 The Policy Statement is a public available document. To ensure unrestricted access its text is located on the current public website of the Company.

1.4 The Policy Statement cannot be fully or partially reproduced, replicated and distributed as an official one without the permission of the Company.

### **2 General provisions**

2.1 The Company makes the observance of the rights and freedoms of citizens as one of the most important conditions for conducting its activities.

2.2 The Policy Statement has been developed in accordance with the Constitution of the Russian Federation, federal legislation and other regulatory legal acts of the Russian Federation in the sphere of processing and protecting personal data.

2.3 The purpose of this document is to inform the personal data subjects and persons involved in their processing of the observance by the

Company of the fundamental principles of legality, fairness, non-redundancy, compliance of the content and volume of processed personal data with stated processing purposes, as well as rights of personal data subjects and operator's obligations.

2.4 The Company's policy relative to the personal data processing determines basic principles, purposes, procedure, conditions and methods of the personal data processing, lists of subjects and categories of personal data processed by the Company, as well as requirements to the protection of personal data implemented by the Company.

2.5 The Company's policy relative to the personal data processing serves the basis for the development of local regulations and documents on the issues of the processing and protection of personal data of employees and other personal data subjects at the Company.

### **3 Purposes of the personal data collection and processing**

3.1 The Company, being the personal data operator, processes the personal data of its employees and other personal data subjects which are not in labor relations with it.

3.2 Personal data are processed by the Company aimed at

- ensuring compliance with the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation, local regulatory acts of the Company;
- performing functions, powers and obligations imposed on the Company by the legislation of the Russian Federation, including the provision of personal data to state authorities, to the Pension Fund of the Russian Federation, to the Social Insurance Fund of the Russian Federation, to the Federal Fund of Compulsory Medical Insurance, as well as to other state authorities;
- regulating labor relations (assistance to candidates and employees in employment, training and promotion, ensuring personal safety, monitoring the quantity and quality of job performed, ensuring the property safety);
- providing the Company's employees additional guarantees and compensations, including pension benefits, voluntary medical insurance, medical care and other types of social security;
- protecting life, health or other vital interests of personal data subjects;
- concluding and fulfilling civil agreements, including agreements for the provision of services;

- forming and consolidating statistical data and indicators in relation to the Company;
- conducting tender procedures provided for by local regulations of the Company;
- preparing powers of attorney issued by the Company;
- preparing, concluding, fulfilling and terminating agreements with counterparties;
- ensuring access and intra-facility modes at the Company's facilities;
- forming reference materials for internal information support of the Company's activities;
- executing judicial acts, acts of other bodies or officials subject to execution in accordance with the legislation of the Russian Federation regarding enforcement proceedings;
- exercising rights and legitimate interests of the Company within the framework of activities provided for by the Articles of Association and other local regulations, or third parties, or the achievement of socially significant objectives.

#### **4 Legal grounds of the personal data processing**

4.1 The legal grounds for the personal data processing in the Company, depending on its purposes are as follows:

4.1.1 Consent of the personal data subjects to the processing of their personal data;

4.1.2 Requirements of the laws of the Russian Federation, international agreements of the Russian Federation, Resolutions of the Government of the Russian Federation and other regulatory legal acts of the Russian Federation governing relations connected with Company's activities;

4.1.3 Articles of Association and other foundation documents of the Company;

4.1.4 Agreements, which party, beneficiary or guarantor is the personal data subjects, including cases when the Company sells its assignment of rights (claims) under such agreement.

4.2 In order to implement the requirements of the Policy Statement, the Company develops corresponding local regulations and other documents.

## **5 Scope and categories of processed personal data, categories of personal data subjects**

5.1 The Company processes personal data of the following categories of the subjects:

- Company's employees and their relatives;
- candidates considered for the conclusion of employment contracts;
- persons who were previously in labor relations with the Company;
- subjects, which personal data processing is connected with the fulfillment of the terms of concluded contracts;
- individuals, having entered into civil law contracts with the Company;
- heads, representatives, employees and founders (individuals) counterparties, including potential ones;
- potential contractors (individuals);
- lawyers, notaries interacting with the Company;
- authors of written appeals to the Company;
- visitors to the corporate website of the Company;
- other personal data subjects.

5.2 The Company processes the following categories of personal data:

- surname, name, patronymic;
- date and place of birth;
- address of the place of residence (registration);
- information about the identity document;
- information on documents confirming the education availability (speciality, qualification), their improvement;
- taxpayer identification number (INN);
- individual personal account insurance number (SNILS);
- facial image (photo);
- full-time and part-time positions;
- information about previous jobs;
- information about wages;
- information about family composition;
- information about military registration;
- name of the structural unit;
- business email address;
- working telephone and fax numbers;
- number and location of work area;

- other data, excluding special categories of personal data concerning race, nationality, political views, religious, philosophical beliefs and intimate life.

5.3 List of categories of personal data relative to a definite subject depends on their processing purpose.

## **6 Procedure and conditions of the personal data processing**

6.1 The Company processes personal data, including their storage by means of using servers located on the territory of the Russian Federation.

6.2 The Company collects, records, accumulates, stores, clarifies, retrieves, uses, transfers, depersonalizes, blocks, deletes, and destroys personal data.

6.3 The personal data processing by the Company is conducted taking into account the necessity to ensure the protection of rights and freedoms of the Company's employees and other personal data subjects, including the protection of privacy right, personal and family secrets, based on the following principles:

- personal data processing is carried out with the consent of the personal data subject on a legal and fair basis;
- personal data processing is limited to the achievement of specific, predetermined and legal purposes;
- personal data processing that is incompatible with the collecting personal data purposes is not allowed;
- it's not allowed to combine databases containing personal data, processing of which is conducted for purposes incompatible with each other;
- only personal data that meet the purposes of their processing are subject to processing;
- content and volume of processed personal data correspond to the stated processing purposes. The processed personal data redundancy in relation to the declared purposes of their processing is not allowed;
- when processing personal data, confidentiality, accuracy of personal data, their sufficiency, and, if necessary, relevance in relation to the personal data processing are ensured. The company undertakes necessary measures to remove or clarify incomplete or inaccurate personal data;
- personal data storage is conducted in a form that allows to determine the personal data subject, no longer than it's required by the personal data processing purpose, if the personal data storage period is not fixed by the federal

law, agreement, a party to which, beneficiary or the guarantor of which is the personal data subject;

- processed personal data are destroyed or depersonalized upon the achievement of the processing purposes or in case of loss of the necessity in achieving these purposes, unless otherwise provided by the current legislation.

6.4 The personal data processing is performed by the Company by the following ways:

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

6.5 While the personal data processing the Company

- undertakes measures necessary for ensuring compliance with the requirements of the legislation of the Russian Federation and local regulations of the Company in the personal data sphere;

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

- provide acquaintance of the Company's employees who directly process personal data with the provisions of the legislation of the Russian Federation and local regulations of the Company in the personal data sphere, including requirements for the personal data protection, responsibility measures for their non-fulfillment, and training of the indicated employees;

- receives consent of the personal data subjects for the processing of their personal data, excluding cases provided for by the legislation of the Russian Federation;

- according to the established procedure communicate to the personal data subjects or their representatives the information on the personal data availability relative to the relevant subjects, provides an opportunity to acquaint themselves with these personal data when contacting and (or) obtaining requests from these personal data subjects or their representatives, unless otherwise provided by the legislation of the Russian Federation;

- terminated processing and destroys personal data in cases provided for by the legislation of the Russian Federation in the personal data sphere;

- publishes or otherwise provides unrestricted access to the present Policy Statement;

- appoints persons responsible for organizing the processing and protection of personal data in the Company.

6.6 The Company has the right to entrust the personal data processing to another person with consent of the personal data subject, unless otherwise provided by the Federal law, on the basis of an agreement concluded with this person. The agreement should provide for the list of actions (operations) with personal data, their processing purposes, as well as the obligation to respect the personal data confidentiality and ensure their safety during processing.

6.7 The Company doesn't provide personal data to third parties and doesn't distribute personal data without the consent of the personal data subject, unless otherwise provided by the Federal law. The Company doesn't perform cross-border transfer of personal data.

6.8 Measures for ensuring the personal data security during their processing in personal data information systems are established in accordance with the local regulations of the Company.

## **7 Updating, correction, deletion and destruction of personal data**

7.1 At a personal data subject's request the Company clarifies processed personal data, blocks or deletes them, if they are incomplete, outdated, inaccurate, illegally received or unnecessary for the declared processing purpose.

7.2 If the personal data subject withdraws the consent for the personal data processing, then the Company terminates their processing and destroys them within 30 working days from the withdrawal receipt date, excluding cases provided for by the current legislation of the Russian Federation.