



General Provisions, Purpose

This Personal Data Processing Policy (hereinafter referred to as the Policy) of Gefco LLC (hereinafter – the Operator, the Company) has been developed pursuant to the requirements of Clause 2, Part 1 of Article 18.1 of the Federal Law No. 152-FZ On Personal Data dated 27.07.2006 (hereinafter – the Law on Personal Data) in order to protect human and citizens' rights and freedoms when processing their personal data (hereinafter – PD), including protection of rights to privacy, personal and family secrets.

The Policy applies to all PD processed by the Operator.

The Policy applies to relations in the field of PD processing that have arisen with the Operator both before and after the official approval of the Policy.

Pursuant to the requirements of Part 2 of Article 18.1 of the Law on Personal Data this Policy is freely available through information and telecommunication network Internet on the Operator's website.

Monitoring of the implementation of the requirements of this Policy is carried out by an authorized person responsible for organizing the PD processing on the Operator's website.

Responsibility for violation of the requirements of the laws of the Russian Federation and regulations of the Operator on processing and protection of PD is determined in accordance with the laws of the Russian Federation.

Reference documents

The Company processes PD on the basis of and pursuant to:

- the Constitution of the Russian Federation;
- the Labor Code of the Russian Federation;
- Federal Law No. 152-FZ On Personal Data dated 27.07.2006;
- Federal Law No. 149-FZ On Information, Informational Technologies and Protection of Information dated 27.07.2006;
- Decree of the Government of the Russian Federation No. 687 On Approval of Regulations on Special Aspects of Non-automated Personal Data Processing dated 15.09.2008;
- Decree of the Government of the Russian Federation No. 1119 On Approval of Requirements to Personal Data Protection During Its Processing in the Information Systems of Personal Data dated 01.11.2012;
- other regulatory legal acts;
- local regulatory acts;
- labor contracts concluded between the Company and its employee;
- agreements concluded between the Company and another Personal Data Subject;
- consent of Personal Data Subject to the processing of their PD.

Perimeter of use

Unlimited access

Definitions

The following basic terms are used for the purposes of this Policy:

PD refers to any information directly or indirectly relating to an identified or identifiable individual (Personal Data Subject);

PD Authorized for Distribution by the Personal Data Subject (hereinafter – PD Authorized for Distribution) refers to PD an general public access to which is granted by the PD Subject by consenting to the processing of PD authorized by the PD Subject for distribution in the manner provided by the Law on Personal Data (hereinafter – Personal Data Authorized for Distribution);

PD Subject refers to an individual to whom any information that makes PD relates. The PD Subjects include employees of the Company; persons performing work/providing services under civil law contracts concluded with the Company; employees of third parties;

Operator refers to the Company as a legal entity that, individually or in cooperation with others, arranges and (or) carries out the PD processing, as well as defines the purpose of PD processing, composition of PD to be processed, actions (operations) applied to PD;

PD processing refers to any automated or non-automated action (operation) or set of such actions (operations) applied to PD, including collection, recording, systematization, accumulation, storage, clarification (update or modification), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of PD;

PD distribution refers to actions aimed at disclosing PD to an undefined group of persons;

PD provision refers to actions aimed at disclosing personal data to a specific person or a defined



group of persons (Clause 6 of Article 3 of the Law on Personal Data);

PD blocking refers to a temporary suspension of PD processing (except when processing is required for PD clarification);

PD destruction refers to actions as a result of which it becomes impossible to restore the content of employees' PD in the personal data information system and (or) as a result of which the PD media are destroyed;

PD anonymization refers to actions resulting in impossibility to determine the owner of PD without additional information.

PD Information System is a set of personal data contained in PD databases and information technologies and technical means that ensure its processing;

PD Cross-Border Transfer refers to PD transfer to a foreign state authority, a foreign individual, or a foreign legal entity in a foreign jurisdiction.

Basic rights and obligations of the Operator

The Operator has the right to:

- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations under the Law on Personal Data and regulations adopted in accordance therewith, unless otherwise provided by the Law on Personal Data or other federal laws;
- entrust the PD processing to another person on the basis of a contract concluded with such person, with the consent of the PD Subject, unless otherwise provided by the federal law. The person who carries out the PD processing on behalf of the Operator is obliged to comply with the principles and rules of PD processing provided by the Law on Personal Data;
- if PD Subject revokes its consent to its PD processing, the Operator has the right to continue the PD processing without the consent of the PD Subject on the grounds specified in the Law on Personal Data.

The Operator is obliged to:

- perform the PD processing in accordance with the requirements of the Law on Personal Data;
- respond to applications and requests from PD Subjects and their legal representatives in accordance with the requirements of the Law on Personal Data;
- inform the authorized body for the protection of the PD Subjects' rights (Federal Service for Supervision of Communications, Information Technology, and Mass Media (Roskomnadzor)) at the request of such body within 30 days from the date of receipt of such a request.

Basic rights and obligations of the PD Subject

The PD Subject has the right to:

- receive information regarding the processing of their PD unless required by the federal laws. The Operator provides such information to the PD Subject in an accessible form, and it should not contain personal data relating to other PD Subjects, unless there are legitimate grounds for the disclosure of such PD. The list of information and the procedure for its receipt is established by the Law on Personal Data;
- demand clarification on their PD, its blocking or destruction if the PD is incomplete, outdated, inaccurate, illegally obtained or not required for the stated purpose of processing;
- take statutory measures to protect their rights, including appealing against actions or inactions of the Company, if the PD Subject believes that the Company is processing their PD in violation of the requirements of the laws of the Russian Federation or otherwise violates their rights and freedoms.

The PD Subject as an employee of the Company is obliged to:

- transfer reliably documented PD established by the Labor Code of the Russian Federation to the Company or its legal representatives;
- notify the Company of any changes in their PD in a timely manner, within a reasonable period not exceeding 5 days.



Purposes of PD collection

PD processing is limited to the achievement of specific, predetermined, and legal purposes. PD processing that is incompatible with the purposes of PD collection is not allowed.

Only PD that meets the purposes of its processing is subject to processing.

The Operator processes PD for the following purposes:

- to ensure compliance with the Constitution of the Russian Federation, federal laws, and other regulatory acts of the Russian Federation;
- to carry out its activities in accordance with the Articles of Association of the Company;
- to maintain personnel records;
- to assist employees in employment, receiving an education and a promotion, to ensure personal safety of employees, to control the quantity and quality of work performed, to ensure the safety of property;
- to attract and select candidates for employment with the Operator;
- to arrange individual (personified) registration of employees in the compulsory pension insurance system;
- to fill in required reporting forms and submit them to executive authorities and other authorized bodies;
- to implement the civil law relations;
- to keep accounting records;
- to implement access control.

The PD processing of the Company's employees may be carried out solely for the purpose of ensuring compliance with the laws and other regulatory acts.

Scope and categories of the processed PD, categories of PD Subjects

The content and scope of the processed PD shall comply with the stated purposes of processing provided by this Policy. The processed PD shall not be redundant in relation to the stated purposes of its processing.

The Operator may process personal data on the following categories of PD Subjects:

- Candidates for employment with the Operator:
 - full name;
 - sex, age;
 - contact details;
 - records of education, experience, and skills;
 - other details that directly or indirectly relate to an identified or identifiable individual submitted by candidates via CVs and cover letters.
- Employees and former employees of the Operator:
 - full name;
 - sex, age;
 - records of education, qualification, vocational training, professional retraining;
 - place of residence;
 - marital status, parental status, family members, family ties;
 - facts of biography and previous employment (including place of work, criminal record, army service, service in elected positions, public service, etc.);
 - financial position, information on salary;
 - passport details;
 - military records;
 - records of social benefits;
 - profession;
 - job title;
 - rate of remuneration;
 - criminal record;
 - phone numbers and other contact details;
 - content of the labor contract;
 - work record books and employment history;



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- driver licenses;
 - data on the results of an occupational fitness medical examination;
 - photographs and other information relating to the employee's personal data;
 - business and other ratable personal qualities;
 - other details that directly or indirectly relate to an identified or identifiable individual.
- Family members of the Operator's employees:
 - full name;
 - relation degree;
 - year of birth;
 - other details provided by employees in accordance with the requirements of labor laws.
 - Customers and counterparties of the Operator (individuals): full name; passport details;
 - place of residence;
 - contact details;
 - replacement position held;
 - taxpayer identification number;
 - account number;
 - other details provided by customers and counterparties (individuals) required for the conclusion and execution of contracts.
 - Representatives (employees) of the Operator's customers and counterparties (legal persons):
 - full name;
 - passport details;
 - contact details;
 - replacement position held;
 - other details provided by representatives (employees) of the customers and counterparties required for the conclusion and execution of contracts.

The Operator processes biometric PD (information on a person's physiological and biological features, based on which their identity can be established) as provided by the laws of the Russian Federation.

The Operator is not allowed to process special categories of PD related to race, nationality, political views, religious or philosophical beliefs, intimate life, except as provided by the laws of the Russian Federation.

The data specified in this section of the Policy and the documents containing such data should be deemed as confidential. The confidentiality of PD is removed in cases of anonymization or on the expiry of terms established by the applicable laws of the Russian Federation.

Procedure and conditions for PD processing

The Operator processes the PD in accordance with the requirements of the laws of the Russian Federation.

PD processing is carried out with the consent of the PD Subjects to the processing of their PD, as well as without such consent in cases provided by the laws of the Russian Federation.

The Operator carries out both automated and non-automated PD processing.

The Operator's employees whose job duties include the PD processing are allowed to PD processing.

PD processing is carried out by:

- receiving PD in oral and written form directly from the PD Subjects;
- obtaining PD from publicly available sources;
- entering PD into the Operator's logs, registers, and information systems;
- using other methods of PD processing.

Disclosure and distribution of PD to third parties are not allowed without the consent of PD Subject, unless otherwise provided by the federal law. Consent to the processing of PD authorized for distribution by the PD Subject shall be executed separately from other types of consent of the PD Subject to process their PD.

Requirements for the content of consent to processing of the PD authorized by the PD Subject for distribution are approved by Order of Roskomnadzor No. 18 dated 24.02.2021.

The transfer of PD to the bodies of inquiry and investigation, the Federal Tax Service, the Pension Fund of the Russian Federation, the Social Insurance Fund and other authorized executive bodies and organizations is carried out in accordance with the requirements of the laws of the Russian Federation.

The Operator shall take the required legal, organizational and technical measures to protect PD from unauthorized or accidental access, destruction, modification, blocking, distribution and other unauthorized actions, specifically:

- identifies threats to the security of PD during PD processing;
- adopts local regulations and other documents regulating relations in the field of PD processing and protection;
- appoints persons responsible for ensuring the security of PD across the Operator's business units and information systems;
- creates the required conditions for working with PD;
- keeps records of documents containing PD;
- organizes work with information systems where PD is processed;
- stores PD under conditions that ensure its safety and keeps PD from unauthorized access to it;
- provides training to the Operator's employees who process PD.

The Operator shall store PD in a form that makes it possible to identify the PD Subject, no longer than required by the purposes of PD processing, unless the term of Personal Data storage is established by federal law or a contract.

When collecting PD, including through the information and telecommunications network Internet, the Operator shall ensure recording, systematization, accumulation, storage, clarification (update, modification), extraction of PD of the Russian Federation citizens using databases located in the Russian Federation, save as provided in the Law on Personal Data.

The Company has the right to entrust the PD processing to another person on the basis of a contract concluded with such person, with the consent of the PD Subject. An essential condition of such a contract is the person's right to process PD, the obligation of the person to ensure the confidentiality of PD, and the security of PD during its processing.

Should the Company entrust PD processing to another person, the Company is liable to the PD Subject for the actions of that person. The person processing PD on behalf of the Company shall be liable to the Company.

The Company does not carry out cross-border transfer of PD.

Updating, correction, deletion and destruction of PD, responses to requests from subjects to access their PD

Confirmation of PD processing performed by the Operator, the legal basis and purpose of PD processing, as well as other information specified in Part 7 of Article 14 of the Law on Personal Data are provided by the Operator to the PD Subject or their representative upon inquiring or receiving a request from the PD subject or their representative.

Information provided shall not include PD relating to other PD Subjects, unless there is a legitimate grounds for disclosing such PD.

The request shall contain:

- number of the main document certifying the identity of the PD Subject or their representative, information on the date of issue of the said document and the body that issued it;
- information confirming the PD Subject's participation in relations with the Operator (contract number, contract date, conventional verbal designation and (or) other information), or information otherwise confirming the PD being processed by the Operator;
- signature of the PD Subject or their representative.

The request may be submitted as an electronic document signed by electronic signature in accordance with the laws of the Russian Federation.

If the application (request) of the PD Subject does not contain all necessary information in accordance with the requirements of the Law on Personal Data or the Subject does not have access rights to the requested information, they should receive a justified refusal.

The Subject's right to access their personal data may be restricted in accordance with Part 8 of Article 14 of the Law on Personal Data, including when the PD Subject's access to their personal data violates the rights and legitimate interests of third parties.



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Should any inaccurate PD be revealed in case of application by PD Subject or their representatives or at their request or the request of Roskomnadzor, the Operator shall block the PD related to the PD Subject upon applying or receiving a request for the period of inspection, if blocking the PD does not violate rights and legitimate interests of the PD Subject or third parties.

Should the fact of inaccuracy of PD or other documents required be confirmed, the Operator clarifies the PD within seven working days from the date of submission of such information and unblocks the PD based on information provided by the PD Subject or their representative or Roskomnadzor.

Should unauthorized PD processing be detected upon request of the PD Subject or their representative or Roskomnadzor, the Operator blocks the unlawfully processed PD related to the PD Subject from the moment of receipt of such application or request.

Once the purpose of PD Processing is fulfilled, as well as should the PD Subject withdraw their consent to its processing, personal data shall be destroyed if:

- unless otherwise provided by the contract, where the PD Subject is the beneficiary or guarantor thereunder and is a party thereto;
- the Operator may not process PD without the consent of the PD Subject on the grounds provided by the Law on Personal Data or other federal laws;
- unless otherwise is provided by another agreement between the Operator and the PD Subject.