

Personal data processing policy

1. General provisions

- 1.1 This Policy on Personal Data Processing (hereinafter the "Policy") has been developed and is implemented by Magnezit Group, Limited Liability Company (hereinafter referred to as the "Operator") in accordance with the Federal Law dated 27 July 2006 No. 152-FZ "On Personal Data" in force in the Russian Federation.
- 1.2 This Policy applies to all personal data that may be obtained from individuals by the Operator in the process of their registration as participants in events organized by Magnezit Group LLC (the Operator) through the official sites of the Operator www.magnezit.com, as well as event sites that include the second-level domain name https://interaction.magnezit.ru/conference/ or/and https://interaction.magnezit.ru/en/conference/.
- 1.3. The Policy determines the behaviour of the Operator in relation to the processing of personal data of individuals being Subjects of personal data accepted for processing; the procedure and conditions for processing personal data of Subjects who have transferred their personal data for processing to the Operator (hereinafter referred to as the Subjects of personal data, the Subjects) with or without the use of automation means; establishes procedures aimed at preventing violations of the legislation of the Russian Federation and elimination of the consequences of such violations related to personal data processing.
- 1.4. The Policy is developed in order to ensure protection of rights and freedoms of the Subjects during processing of their personal data, to inform the Subjects of personal data and persons involved in the processing of personal data on the observance by the Operator of the fundamental principles of lawfulness, fairness, parsimony, compliance of the content and volume of processed personal data with the stated purposes of processing, as well as to establish the responsibility of the Operator's officials having access to the Subjects' personal data for failure to comply with the requirements of the legislation of the Russian Federation.
- 1.5. The Operator processes the following personal data:
- name, surname, patronymic (if any);
- company/organisation;
- country;
- position/status;
- email address:
- the way they learn about the event;
- choice of participation in the event section, if any.
- 1.6. When using services of the Sites, the Operator also processes other impersonal data which is automatically transferred in the process of using the Site by means of the software installed on the computer, namely: information about the browser used (or other software with which the Site is accessed).

The Operator guarantees that organizations external to the Operator do not have access to such data, which can be used by the Operator, except in cases clearly stipulated by the current legislation of the Russian Federation and paragraph 3.2. of



this Policy. Upon receipt of personal data not specified in this section, such data shall be immediately destroyed.

- 1.7. The Operator processes personal data of the Subjects by maintaining databases by automated, mechanical, manual means for the following purposes:
- 1.7.1. registration of the Subject of personal data for the Conference in the Operator's database with subsequent sending of postal messages to the Subject of personal data for participation in the Conference information mailings and notifications about the forthcoming event and an invitation containing data for entering the Zoom platform for participation in the Conference;
- 1.7.2. registration of the Participant Certificate after the Conference;
- 1.7.3. determining the number of participants in each of the sections and moderation of communication for smooth operation of each section of the Conference;
- 1.7.4. collecting and processing of anonymous data about where the participants of the Conference (Subjects of Personal Data) learned about the Conference for further work of the Operator.
- 1.8. The Operator carries out processing of the personal data by fulfilment of any action (operation) or set of actions (operations), including collection, recording, systematization, accumulation, storage, specification (updating, change), extraction, use, transfer (distribution, granting, access), depersonalization, blocking, removal, destruction.

2. Receipt, use and disclosure of personal data

2.1. The Operator receives and starts processing personal data of the Subjects of Personal Data from the moment of obtaining their consent by registering for the Conference or sending a feedback form on the Website.

Consent to the personal data processing may be given by the Subject in any form that allows to confirm the fact of obtaining consent, unless otherwise provided by federal law, including by filling in on the sites of the Operator by means of ticking by the Subject of personal data on the appropriate web page, where the Subjects give consent to the processing of their personal data.

- 2.2 Personal data of the Subjects are obtained by the Operator through personal transfer of personal data by the Subject when entering information into registration forms in electronic form on the Operator's Websites, as well as by other means that do not contradict the legislation of the Russian Federation and the requirements of international legislation on personal data protection.
- 2.3. Consent to the processing of personal data shall be deemed to have been given if the Subject performs any action or set of actions as follows:
- marking of the consent to the processing of personal data in the appropriate form on the Sites in the scope, for the purposes and in the manner provided in the form proposed before obtaining consent for review and filling;
- communication of personal data in oral form when applying to the Operator in the process of registration as a visitor or participant of the event.



- 2.4. The consent is considered to be given in the established order and is valid for the period of time indicated in the consent to the processing or until the Subjects send the relevant application for termination of personal data processing at the Operator's location or a written application in any form sent to the e-mail address info@magnezit.com.
- 2.5. The Subjects may at any time withdraw their consent to the processing of personal data provided that such a procedure does not violate the requirements of the legislation of the Russian Federation. In order to withdraw the consent to the processing of personal data, the Subject must send a notice to info@magnezit.com.

In case the Subject withdraws the consent to the processing of the personal data, the Operator is obliged to stop processing them or ensure the termination of such processing (if the processing is carried out by another person acting on behalf of the Operator) and if the storage of personal data is no longer required for the purposes of its processing, destroy personal data or ensure its destruction (if the processing of personal data is carried out by another person acting on behalf of the Operator) within a period not exceeding thirty (30) days from the date of receipt of the order, unless otherwise is provided in the application of the Subject.

3. Rules and procedure for personal data processing

- 3.1. For the purpose of this Policy, only those employees of the Operator who are entrusted with such a duty in accordance with their work (job) duties are allowed to process personal data. The Operator requires its employees to maintain the confidentiality and security of personal data during their processing.
- 3.2 In accordance with this Policy the Operator may process personal data independently as well as with the involvement of third parties who are engaged by the Operator and carry out processing for the purposes specified in this Policy.
- 3.3. In the case of an order to process personal data to a third party, the amount of personal data transferred to the third party and the number of processing methods used by the third party must be the minimum required to perform their duties to the Operator. With respect to the processing of personal data by third parties, the obligation of such persons to respect the confidentiality of personal data and to ensure the security of personal data during their processing is established.
- 3.4. In the course of its activities the Operator uses both automated processing of personal data (using computer aids) and non-automated processing (using paperwork).

Decisions generating legal consequences in relation to the Subjects of Personal Data or otherwise affecting their rights and legal interests shall not be made on the basis of the automated processing of personal data by the Operator.

- 3.5. With regard to personal data of the Subjects, confidentiality shall be maintained, except in cases where the Subjects voluntarily provide information about themselves for public access to an unlimited range of persons. In this case, the Subjects agree that a certain part of their personal information will be made available to the public.
- 4. Information on the requirements for the protection of personal data that are being implemented



- 4.1 The activities of the Operator in personal data processing are inextricably linked to the protection of the confidentiality of the information received by the Operator.
- 4.2 The Operator requires other persons who have gained access to personal data not to disclose or distribute personal data to third parties without the consent of the Subject of personal data, unless otherwise provided by federal law.
- 4.3. All employees of the Operator are obliged to ensure confidentiality of personal data as well as other information established by the Operator, if it does not contradict the legislation of the Russian Federation.
- 4.4. For the purpose of safety of the personal data at its processing the Operator takes appropriate and sufficient legal, organizational and technical measures for protection of the personal data from illegal or casual access to them, destruction, change, blocking, copying, granting, distribution of the personal data, and also from other illegal actions concerning them. The Operator provides, that all performed actions on organizational and technical protection of the personal data were carried out legally, including according to requirements of the legislation of the Russian Federation concerning processing of the personal data.
- 4.5 The Operator applies the appropriate and sufficient legal, organizational and technical measures to ensure the safety of personal data, including a set of measures to ensure the safety of personal data, implemented by the Operator as part of the system of personal data protection, taking into account current threats to the safety of personal data and applied information technology.
- 4.6 With a view to ensuring compliance of the level of personal data protection with the requirements of the Federal Law dated 27.07.2006 No. 152-FZ "On Personal Data" and the Federal Law dated 27.07.2006 No. 149-FZ "On Information, Information Technologies and Information Protection", the Operator does not disclose information on specific means, technologies and measures applied to ensure information security of personal data.
- 4.7. The Operator undertakes not to disclose personal data received from the Subject. The provision of personal information by the Operator to agents and third parties acting on the basis of the contract with the Operator for the purpose of fulfilling their obligations to the Subjects of personal data shall not constitute a violation. Disclosure of information in accordance with the applicable requirements of the legislation of the Russian Federation is not a violation of the obligations.

5. Consent to receive advertising information via telecommunication networks

- 5.1. By registering as a participant of the Conference, by filling in personal data on the Operator's Websites (by way of ticking by the Subjects of Personal Data on the relevant web page), the Subjects give their consent to the processing of their personal data and receipt of information from the Operator and third parties attracted by the Operator at the provided e-mail address.
- 5.2 By giving the consent specified in paragraph 5.1 of this Policy, the Subjects of Personal Data confirm that they are acting at their own will and in their own interests, and that the personal data provided is true. In the absence of the consent of the



Subject to the processing of his or her personal data, no such processing shall take place.

6. Final Provisions

- 6.1 This Policy is approved by order of the General Director of Magnezit Group LLC and will come into effect on the day the order is signed.
- 6.2 The Policy may be amended and supplemented subject to approval by orders of the General Director of Magnezit Group LLC.
- 6.3 The current version of the Policy is publicly available on the Internet at www.magnezit.com, as well as on the websites of the official events organised by Magnezit Group LLC.