

Appendix No. 1

APPROVED  
by order of Apatit, JSC

**POLICY**  
**of Apatit, JSC Regarding the Processing of Personal Data and**  
**Information on Implemented Personal Data Protection Requirements**

## 1. General Provisions

1.1. The Policy of Apatit, JSC regarding the processing of personal data and information on implemented personal data protection requirements (hereinafter referred to as the “Policy”) defines the general principles and procedures for processing personal data and measures to ensure their security at Apatit, JSC (hereinafter referred to as the “Company”).

The purpose of the Policy is to ensure the protection of the rights and freedoms of individuals during the processing of their personal data, including the protection of the right to privacy, personal and family secrets, as well as strict and consistent compliance with the requirements of Russian legislation in the field of personal data.

1.2. The Policy has been developed in accordance with the provisions of Federal Law No. 152-FZ of July 27, 2006 “On Personal Data” and other legislative and regulatory legal acts that define the procedure for working with personal data and the requirements for ensuring their security.

1.3. In the Policy, the following terms and definitions are used:

**Automated processing of personal data** means processing of personal data using computer technology.

**Biometric personal data** means information describing the physiological and biological characteristics of a person, which can be used to establish their identity and are used by the operator to identify the data subject.

**Blocking of personal data** means temporary cessation of the processing of personal data (except in cases where processing is necessary to clarify personal data).

**Data center** means a specialized organization providing services for the accommodation of server and network equipment, leasing of servers (including virtual ones), and connection to the Internet.

**Access to personal data** means familiarization of certain individuals (including employees) with the subjects’ personal data being processed, provided that the said data are kept confidential.

**Personal data information system (PDIS)** means a set of personal data contained in databases, information technologies and technical means that ensure their processing.

**Counterparty** means a party to an agreement with Apatit, JSC.

**Confidentiality of personal data** means the obligation of persons who have gained access to personal data not to disclose to third parties or disseminate personal data without the consent of the data subject, unless otherwise provided by law.

**Depersonalization of personal data** means actions as a result of which it becomes impossible to determine the relation of personal data to a specific data subject without the use of additional information.

**Processing of personal data** means any action (operation) or set of actions (operations) performed, using or not using automation tools, with personal data, including collection, recording, systematization, accumulation, storage, refinement (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

**Publicly available personal data** means personal data to which access is granted to an unlimited number of persons by the data subject on the basis of legislation or at their request, including data which are subject to mandatory disclosure or publication.

**Operator** means a government or municipal body, legal entity or individual, independently or jointly with other persons organizing and/or carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, and the actions (operations) performed with personal data.

**Personal data (PD)** means any information relating directly or indirectly to a specific or identifiable individual (data subject).

**Provision of personal data** means actions aimed at disclosing personal data to a specific person or a specific group of persons.

**Dissemination of personal data** means actions aimed at disclosing personal data to an indefinite number of persons.

**Data subject** means an individual to whom the personal data relate.

**Cross-border transfer of personal data** means transfer of personal data to the territory of a foreign state to a foreign government body, a foreign individual, or a foreign legal entity.

**Destruction of personal data** means 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 of personal data are destroyed.

## **2. General Personal Data Processing Requirements**

### **2.1. Status of the Company and Categories of Data Subjects Whose Personal Data are Processed by the Company**

2.1.1. The Company is an operator that processes the PD of the following individuals:

2.1.1.1. Employees of the group of companies;

2.1.1.2. Representatives of a legal entity, counterparty;

2.1.1.3. Close relatives of Employees of the group of companies;

2.1.1.4. Individuals working under civil law contracts;

2.1.1.5. Website visitors;

2.1.1.6. Students;

2.1.1.7. Shareholders;

2.1.1.8. Members of the Board of Directors;

2.1.1.9. Participants in events, course listeners, office visitors, clients;

2.1.1.10. Affiliated persons;

2.1.1.11. Applicants for vacant positions;

2.1.1.12. Visitors entering the protected territory of Apatit, JSC;

2.1.1.13. Previous supervisors of applicants for vacant positions.

2.1.2. The Company acts as a processor of PD on behalf of other operators, which include (but are not limited to):

2.1.2.1. Government bodies and State extra-budgetary funds to which employee funds or funds for crediting to Employee accounts are transferred (Federal Tax Service Inspectorates, territorial branches of the Pension Fund of the Russian Federation, the Federal Compulsory Medical Insurance Fund, the Social Insurance Fund of the Russian Federation, etc.);

2.1.2.2. Military commissariats, trade union bodies to which PD are provided (transferred) in cases stipulated by law;

2.1.2.3. PD are provided (transferred) to government bodies and State extra-budgetary funds, military commissariats, and trade union bodies in the scope determined by the legislation of the Russian Federation, by the relevant government bodies and State extra-budgetary funds within their powers. Special consent of the data subjects for such transfer of PD is not required.

2.1.2.4. Companies belonging to the same group of companies as the Company, which obtain written consent for the transfer of PD of their employees to the Company for further processing. The Company does not independently obtain such consents and does not provide relevant information about such processing before the start of processing the PD of employees of companies belonging to the same group of companies as the Company, assuming that this has been done by their employers.

### **2.2. Principles and Purposes of Personal Data Processing**

2.2.1. The Company processes PD in accordance with the following principles and purposes:

2.2.2. Ensuring legality and fair basis for processing PD. The Company takes all necessary measures to comply with the requirements of the legislation of the Russian Federation, does not process PD in cases where it is not permitted by the legislation of the Russian Federation, and does not use PD to the detriment of the data subjects.

2.2.3. Limiting the processing of PD to achieving specific, predetermined, and legitimate purposes. The Company processes PD in accordance with the requirements of the legislation of the Russian Federation in the field of PD. For each purpose of processing PD, the categories of data subjects, as well as the categories and list of PD being processed, the processing periods, and the legal basis for processing PD are defined:

No.	Processing type (automated, non-automated, mixed)	Processing purpose	Legal basis for processing	Categories of data subjects (employees, clients, counterparty representatives, visitors, etc.)	Processed personal data	Processing (storage) period or conditions for termination of processing
1	Mixed	Performance of work and services defined by the company's charter and licenses, including making decisions on conclusion of service agreements, due diligence checks, conclusion and fulfillment of relevant agreements, organization of document flow, admission to company premises	Tax Code of the Russian Federation of 31.07.1998 No. 146-FZ. Federal Law of 06.12.2011 No. 402-FZ "On Accounting". Civil Code of the Russian Federation (Part One) of 30.11.1994 No. 51-FZ (Chapter 10. "Representation. Power of Attorney", Chapter 28. "Conclusion of a Contract"). Written consent to provide their personal data to third parties	Representative of a legal entity, counterparty	Last name, first name, patronymic Date of birth Place of birth Information about the main identity document (series, number, date of issue, issuing authority) Position and place of work Phone number and other contact details (including work contact details) SNILS (Individual Insurance Account Number) TIN (Taxpayer Identification Number) Email address	For the period of the Agreement, the limitation period, and the subsequent five (5) years from the date of termination of contractual obligations, unless otherwise stipulated by the legislation of the Russian Federation. The processing of personal data shall be terminated in cases of revelation of unlawful processing of personal data, upon achievement of the purpose of processing personal data, in case of withdrawal of consent by the Data Subject for the processing of their personal data, or upon reaching the archival data retention deadlines in accordance with the legislation of the Russian Federation. Upon achievement of the processing purposes and retention deadlines, personal data shall be destroyed on both paper and electronic media (by means of repeated overwriting or physical impact).
2	Mixed	Performance of work and services defined by the company's charter and licenses, including making decisions on conclusion of service agreements, due diligence checks, conclusion and fulfillment of relevant agreements, organization of document flow		Persons working under civil law contracts	Last name, first name, patronymic Date of birth Place of birth Citizenship Gender Foreign language proficiency Profession, Qualification Education level Name of the educational institution Year of graduation Education document number Specialization according to the education document Information about the main identity document (series, number, date of issue, name of the issuing authority, department code (if any)) Registration address	

No.	Processing type (automated, non-automated, mixed)	Processing purpose	Legal basis for processing	Categories of data subjects (employees, clients, counterparty representatives, visitors, etc.)	Processed personal data	Processing (storage) period or conditions for termination of processing
					Residential address Phone number and other contact details (including work contact details) Information on advanced training and professional retraining (including series, number, date of issue of the document on advanced training or retraining, name and location of the educational institution, start and end dates of training, qualification and specialization upon graduation from the educational institution, and other information) Information on disability Information on social benefits and social status (series, number, date of issue, name of the issuing authority, document serving as the basis for granting benefits and status, and other information) SNILS (Individual Insurance Account Number) TIN (Taxpayer Identification Number) Information on monthly income, accrued taxes and insurance contributions, amounts of deductions and transfers Photo	
3	Automated	Arrangement of website	Consent to the	Website visitor	Full name, email, phone number,	For the period from the moment of

No.	Processing type (automated, non-automated, mixed)	Processing purpose	Legal basis for processing	Categories of data subjects (employees, clients, counterparty representatives, visitors, etc.)	Processed personal data	Processing (storage) period or conditions for termination of processing
4		visitor feedback, including analysis of user activity, website improvement, arrangement of informational and advertising mailings	processing of personal data		cookies	its receipt until the withdrawal of consent by the data subject. The processing of personal data shall be terminated in cases of revelation of unlawful processing of personal data, upon achievement of the purpose of processing personal data, in case of withdrawal of consent by the Data Subject for the processing of their personal data, or upon reaching the archival data retention deadlines in accordance with the legislation of the Russian Federation. Upon achievement of the processing purposes and retention deadlines, personal data shall be destroyed on both paper and electronic media (by means of repeated overwriting or physical impact).
5	Mixed	Creation of conditions for the performance of job duties by the data subject, including: <ul style="list-style-type: none"> <li>– assistance in employment;</li> <li>– performance of functions, powers, and duties assigned to the Company by the current legislation of the Russian Federation;</li> <li>– creation of conditions for the data subject to fulfill job duties;</li> <li>– confirmation of the</li> </ul>	Labor Code of the Russian Federation of 30.12.2001 No. 197-FZ (Article 65, Chapter 14 “Protection of Employee Personal Data”). Federal Law of 27.07.2006 No. 152-FZ “On Personal Data” (Paragraphs 1 and 5, Part 1, Art. 6). Tax Code of the Russian Federation of 31.07.1998 No. 146-FZ. Federal Law of	Employees of the group of companies	Last name, first name, patronymic, including previous last names, first names, patronymics, information on when, where, and why they were changed Information on the main identity document and international passport (series, number, date of issue, issuing authority, division code (if applicable)) Personnel number Date of birth Place of birth Registration address Actual residential address SNILS (Individual Insurance Account Number)	In accordance with Federal Law No. 125-FZ of October 22, 2004 “On Archival Affairs in the Russian Federation” and Order No. 236 of the Federal Archival Agency of the Russian Federation dated December 20, 2019 “On Approval of the List of Standard Administrative Archival Documents Generated in the Course of Activities of State Bodies, Local Government Bodies, and Organizations, Specifying Their Retention Periods”: 50 years. The processing of personal data shall be terminated in cases of revelation

No.	Processing type (automated, non-automated, mixed)	Processing purpose	Legal basis for processing	Categories of data subjects (employees, clients, counterparty representatives, visitors, etc.)	Processed personal data	Processing (storage) period or conditions for termination of processing
		<p>data subject's qualifications for the position, assessment of the data subject's compliance with the qualification requirements for the position;</p> <ul style="list-style-type: none"> <li>– monitoring of the quantity and quality of work performed;</li> <li>– arrangement of voluntary health insurance (VHI) and industrial accident insurance;</li> <li>– arrangement of spa treatment and recreational holidays;</li> <li>– organization of vacations in children's camps;</li> <li>– organization of financial assistance, compensation for mortgages, provision of official housing;</li> <li>– enforcement of security in the territory, implementation of access control in the territory;</li> <li>– purchase of tickets, hotel reservations;</li> <li>– advanced training,</li> </ul>	<p>06.12.2011 No. 402-FZ "On Accounting". Civil Code of the Russian Federation (Part One) of 30.11.1994 No. 51-FZ (Chapter 10 "Representation. Power of Attorney"). Resolution of the Government of the Russian Federation of 16.04.2003 No. 225 "On Work Books". Order of the Government of the Russian Federation of 21.03.1994 No. 358-r "On Ensuring the Safety of Personnel Documents". Resolution of the State Statistics Committee of Russia of 05.01.2004 No. 1 "On Approval of Unified Forms of Primary Accounting Documentation for Labor and its Payment". Consent to the processing of personal data.</p>		<p>TIN (Taxpayer Identification Number)  Phone number, email address, and other contact information (including work details)  Photo (in analog and digital form)  Citizenship, residency  Gender  Profession, qualification, position;  Work experience  Nature and type of work  Information on work activity at the company (numbers and dates of personnel orders (instructions), employment contracts and addenda, employment dates, changes in terms of employment, termination date, company name, structural unit, unit code, workplace, personnel category, profession code, grade, job function, probationary period, labor payment conditions, form of payment, pay system, work and rest schedule, working conditions, compensation for arduous work and work with harmful and/or dangerous conditions, duration and periods of main and additional leaves, employee's duties  Information about the number, series, and date of issue of the work book (enclosure to it)  Information on the pay rate (fixed salary), allowances, monthly income, accrued taxes and insurance contributions, deductions and transfers  Materials on employee certification</p>	<p>of unlawful processing of personal data, upon achievement of the purpose of processing personal data, in case of withdrawal of consent by the Data Subject for the processing of their personal data, or upon reaching the archival data retention deadlines in accordance with the legislation of the Russian Federation. Upon achievement of the processing purposes and retention deadlines, personal data shall be destroyed on both paper and electronic media (by means of repeated overwriting or physical impact).</p>



No.	Processing type (automated, non-automated, mixed)	Processing purpose	Legal basis for processing	Categories of data subjects (employees, clients, counterparty representatives, visitors, etc.)	Processed personal data	Processing (storage) period or conditions for termination of processing
		<p>organization of training;</p> <ul style="list-style-type: none"> <li>– organization of internal and external document flow;</li> <li>– formation of a personnel reserve;</li> <li>– issuance of payroll cards;</li> <li>– payment of amounts, including wages;</li> <li>– provision of guarantees and benefits stipulated by regulatory legal acts, agreements, collective bargaining agreement, employment contracts;</li> <li>– issuance of electronic signatures;</li> <li>– medical examinations;</li> <li>– special assessment of working conditions;</li> <li>– investigation of accidents;</li> <li>– investigation of occupational diseases;</li> <li>– provision of personal protective equipment;</li> </ul>			<p>and evaluation</p> <p>Information on advanced training and professional retraining (including document series, number, date of issue, institution name and location, start and end dates, qualification and specialization upon graduation from the educational institution, etc.)</p> <p>Information on previous jobs and positions as indicated in the work book, information on professional skills</p> <p>Education level</p> <p>Educational institution name</p> <p>Year of graduation</p> <p>Number of the education document</p> <p>Specialization according to the education document</p> <p>Academic degree</p> <p>Information on state and departmental awards, honorary and special titles, incentives (including name of the award, title, or incentive, date and type of regulatory act on the award, or date of incentive)</p> <p>Foreign language skills</p> <p>Military registration information (for reservists and conscripts: series, number, date of issue of the military registration card, issuing authority, military specialty, military rank, data on enlistment/resignation, and other information)</p> <p>Bank account number and bank details</p> <p>Information on disability</p>	

No.	Processing type (automated, non-automated, mixed)	Processing purpose	Legal basis for processing	Categories of data subjects (employees, clients, counterparty representatives, visitors, etc.)	Processed personal data	Processing (storage) period or conditions for termination of processing
		<ul style="list-style-type: none"> <li>– provision of corporate communication;</li> <li>– issuance of business cards.</li> </ul>			<p>Information on social benefits and social status (series, number, date of issue, issuing authority, document serving as the basis for benefits and status, etc.)</p> <p>Pension certificate number and information on pension assignment</p> <p>Information on temporary disability</p> <p>List of contraindications to performing job duties</p> <p>Information on the results of any medical examinations, information on health status relating to the performance of job duties and directly connected with the performance of job duties</p> <p>Medical insurance policy details</p> <p>Information on work time recording, work time usage, data on entry/exit from the Employer's territory, information on work performed, etc.</p> <p>Information about close relatives (marital status, family composition, full name of relatives, date of birth of relatives, degree of kinship, contact information)</p> <p>Information on alimony payments</p> <p>Information on criminal records (in cases established by law)</p> <p>Information on violations and penalties;</p> <p>Sizes of work clothes, safety footwear, and other personal protective equipment</p>	
6	Mixed	Organization of internships, student practical trainings	Agreement with the counterparty, consent to the processing of	Students	Last name, first name, patronymic; changes in the Last name, first name, patronymic (if any); place of	For the period of the Agreement, the limitation period, and for the subsequent five (5) years from the

No.	Processing type (automated, non-automated, mixed)	Processing purpose	Legal basis for processing	Categories of data subjects (employees, clients, counterparty representatives, visitors, etc.)	Processed personal data	Processing (storage) period or conditions for termination of processing
			personal data		study; major or field of study; type of education, year of education, passport particulars, TIN (Taxpayer Identification Number), SNILS (Individual Insurance Account Number)	date of termination of contractual obligations, unless otherwise stipulated by the legislation of the Russian Federation. The processing of personal data shall be terminated in cases of revelation of unlawful processing of personal data, upon achievement of the purpose of processing personal data, in case of withdrawal of consent by the Data Subject for the processing of their personal data, or upon reaching the archival data retention deadlines in accordance with the legislation of the Russian Federation. Upon achievement of the processing purposes and retention deadlines, personal data shall be destroyed on both paper and electronic media (by means of repeated overwriting or physical impact).
7	Mixed	Maintaining the shareholder register, including holding of general shareholder meetings, processing of applications for nominating candidates to elected bodies	Federal Law of 26.12.1995 No. 208-FZ "On Joint-Stock Companies" (Chapter VI. Register of Shareholders of the Company)	Shareholders	Last name, first name, patronymic Citizenship Information on the main identity document (series, number, issue date, issuing authority) Date of birth Registration address Residential address Specimen signature of the securities holder Information on the number of securities, type, category, state registration number of the securities issue recorded in the personal	Not less than 3 years after the write-off of all securities from the shareholder's account. The processing of personal data shall be terminated in cases of revelation of unlawful processing of personal data, upon achievement of the purpose of processing personal data, in case of withdrawal of consent by the Data Subject for the processing of their personal data, or upon reaching the archival data retention deadlines in accordance

No.	Processing type (automated, non-automated, mixed)	Processing purpose	Legal basis for processing	Categories of data subjects (employees, clients, counterparty representatives, visitors, etc.)	Processed personal data	Processing (storage) period or conditions for termination of processing
					account List of transactions TIN Form of payment of income on securities (cash or non-cash) Bank details (for non-cash payment of income)	with the legislation of the Russian Federation. Upon achievement of the processing purposes and retention deadlines, personal data shall be destroyed on both paper and electronic media (by means of repeated overwriting or physical impact).
8	Mixed	Booking of tickets, hotel reservations. Posting of information about members of the board of directors and management board on the website for the annual report. Transfer of remuneration to members of the board of directors	Consent to the processing of personal data	Members of the Board of Directors	Full name, date of birth, place of birth, citizenship, gender, passport number and series, issuing authority and date, registration address, actual residence address, phone number, TIN, e-mail, bank details, SNILS, foreign language proficiency, profession, qualifications, work experience, information about previous workplaces and positions held as indicated in the work record book, marital status, education information (including series, number, date of issue, name of the issuing authority of the education document, information on academic degrees and awards, information on advanced training and professional retraining)	For the period from the moment of its receipt until the withdrawal of consent by the data subject. The processing of personal data shall be terminated in cases of revelation of unlawful processing of personal data, upon achievement of the purpose of processing personal data, in case of withdrawal of consent by the Data Subject for the processing of their personal data, or upon reaching the archival data retention deadlines in accordance with the legislation of the Russian Federation. Upon achievement of the processing purposes and retention deadlines, personal data shall be destroyed on both paper and electronic media (by means of repeated overwriting or physical impact).
9	Mixed	Provision of services and organization of events, including transportation of excursion groups	Consent to the processing of personal data	Event participants, course attendees, office visitors, clients	Full name, phone number, email, place of study	For the period of the Agreement, the limitation period, and for the subsequent five (5) years from the date of termination of contractual

No.	Processing type (automated, non-automated, mixed)	Processing purpose	Legal basis for processing	Categories of data subjects (employees, clients, counterparty representatives, visitors, etc.)	Processed personal data	Processing (storage) period or conditions for termination of processing
10	Mixed	Provision services, including arrangement of hotel accommodation, provision of medical services			Full name, phone number, passport details or international passport details, health information	obligations, unless otherwise stipulated by the legislation of the Russian Federation. The processing of personal data shall be terminated in cases of revelation of unlawful processing of personal data, upon achievement of the purpose of processing personal data, in case of withdrawal of consent by the Data Subject for the processing of their personal data, or upon reaching the archival data retention deadlines in accordance with the legislation of the Russian Federation. Upon achievement of the processing purposes and retention deadlines, personal data shall be destroyed on both paper and electronic media (by means of repeated overwriting or physical impact).
11	Mixed	Publication of information on employees	Consent to the processing of personal data	Employees of the group of companies	Full name, photos, and contact details	For the period from the moment of its receipt until the withdrawal of consent by the data subject. The processing of personal data shall be terminated in cases of revelation of unlawful processing of personal data, upon achievement of the purpose of processing personal data, in case of withdrawal of consent by the Data Subject for the processing of their personal data, or upon reaching the archival data retention deadlines in accordance with the legislation of the Russian Federation.

No.	Processing type (automated, non-automated, mixed)	Processing purpose	Legal basis for processing	Categories of data subjects (employees, clients, counterparty representatives, visitors, etc.)	Processed personal data	Processing (storage) period or conditions for termination of processing
						Federation. Upon achievement of the processing purposes and retention deadlines, personal data shall be destroyed on both paper and electronic media (by means of repeated overwriting or physical impact).
12	Mixed	Publication of information	Consent to the processing of personal data	Event participants, course attendees	Full name, place of study	For the period from the moment of its receipt until the withdrawal of consent by the data subject. The processing of personal data shall be terminated in cases of revelation of unlawful processing of personal data, upon achievement of the purpose of processing personal data, in case of withdrawal of consent by the Data Subject for the processing of their personal data, or upon reaching the archival data retention deadlines in accordance with the legislation of the Russian Federation. Upon achievement of the processing purposes and retention deadlines, personal data shall be destroyed on both paper and electronic media (by means of repeated overwriting or physical impact).
13	Mixed	Provision of benefits and guarantees to employees, as stipulated by federal legislation for persons who have (adopted) children, persons with family responsibilities. Compliance	Labor Code of the Russian Federation of 30.12.2001 No. 197 FZ (Chapter 41 "Specifics of Labor Regulation for Women, Persons with	Relatives of employees of the group of companies	Last name, first name, patronymic Degree of kinship Date of birth Place of birth For children and dependents of the Employee, additionally: Information on the main identity	The data shall be processed during the entire duration of the employment contract with the employee, as well as until the moment of fulfillment of all obligations to the dismissed employee.

No.	Processing type (automated, non-automated, mixed)	Processing purpose	Legal basis for processing	Categories of data subjects (employees, clients, counterparty representatives, visitors, etc.)	Processed personal data	Processing (storage) period or conditions for termination of processing
		with the requirements of regulatory legal acts of State statistical accounting bodies	Family Responsibilities"). Resolution of the State Statistics Committee of Russia of 05.01.2004 No. 1 "On Approval of Unified Forms of Primary Accounting Documentation for Labor and its Payment"		document (series, number, issue date, issuing authority)	The processing of personal data shall be terminated in cases of revelation of unlawful processing of personal data, upon achievement of the purpose of processing personal data, in case of withdrawal of consent by the Data Subject for the processing of their personal data, or upon reaching the archival data retention deadlines in accordance with the legislation of the Russian Federation. Upon achievement of the processing purposes and retention deadlines, personal data shall be destroyed on both paper and electronic media (by means of repeated overwriting or physical impact).
14	Mixed	Disclosure of information about affiliated persons	Federal Law of 22.04.1996 No. 39-FZ "On the Securities Market" (Part 9, Art. 30); Federal Law of 26.12.1995 No. 208 FZ "On Joint-Stock Companies" (Part 1, Art. 92); Regulations of the Bank of Russia of 30.12.2014 No. 454-P "On Disclosure of Information by Issuers of Equity Securities" (Chapter 73 "Disclosure of Information on	Affiliated persons	Last name, first name, patronymic Place of residence (only with the consent of the affiliated person) Basis for recognizing the person as affiliated Date of occurrence of the basis Share of the affiliated person in the authorized capital of the Company Number of ordinary shares of the Company owned by the affiliated person	Not less than 3 years from the date of expiry of the period fixed for publishing the list of affiliated persons on the Internet, or if it has been published on the Internet after the expiry of such a period, from the date of its publication on the Internet. The processing of personal data shall be terminated in cases of revelation of unlawful processing of personal data, upon achievement of the purpose of processing personal data, in case of withdrawal of consent by the Data Subject for the processing of their personal data, or upon

No.	Processing type (automated, non-automated, mixed)	Processing purpose	Legal basis for processing	Categories of data subjects (employees, clients, counterparty representatives, visitors, etc.)	Processed personal data	Processing (storage) period or conditions for termination of processing
			Affiliated Persons of a Joint-Stock Company")			reaching the archival data retention deadlines in accordance with the legislation of the Russian Federation. Upon achievement of the processing purposes and retention deadlines, personal data shall be destroyed on both paper and electronic media (by means of repeated overwriting or physical impact).
15	Mixed	Approval of decisions on the possibility of filling vacant positions with applicants	Labor Code of the Russian Federation of 30.12.2001 No. 197-FZ (Article 65, Chapter 14 "Protection of Employee's Personal Data"). Federal Law of 27.07.2006 No. 152 FZ "On Personal Data" (Paragraph 5, Part 1, Article 6)	Applicants for vacant positions	Last name, first name, patronymic, including previous last names, first names, patronymics and information on dates, places. and reasons of changes Gender Information on the main identity document (series, number, issue date, issuing authority, department code, if any) Date of birth Place of birth Citizenship Registration address Residential address Phone number and other contact details Education information Academic degree and awards Information on work experience and previous employment Other information provided by applicants	Until the occurrence of one of the following events (whichever is earlier): conclusion of the employment contract; refusal to conclude the employment contract; withdrawal of consent by the data subject. The processing of personal data shall be terminated in cases of revelation of unlawful processing of personal data, or in case of withdrawal of consent by the Data Subject for the processing of their personal data. Upon achievement of the processing purposes and retention deadlines, personal data shall be destroyed on both paper and electronic media (by means of repeated overwriting or physical impact).
16		Maintenance of the employee pool			Previous workplaces	For the period from the moment of its receipt until the withdrawal of consent by the data subject. The processing of personal data shall



No.	Processing type (automated, non-automated, mixed)	Processing purpose	Legal basis for processing	Categories of data subjects (employees, clients, counterparty representatives, visitors, etc.)	Processed personal data	Processing (storage) period or conditions for termination of processing
						<p>be terminated in cases of revelation of unlawful processing of personal data, upon achievement of the purpose of processing personal data, in case of withdrawal of consent by the Data Subject for the processing of their personal data, or upon reaching the archival data retention deadlines in accordance with the legislation of the Russian Federation.</p> <p>Upon achievement of the processing purposes and retention deadlines, personal data shall be destroyed on both paper and electronic media (by means of repeated overwriting or physical impact).</p>
17	Non-Automated	Provision of access to the territory and secure premises for persons without permanent passes	Contract with the counterparty, consent to the processing of personal data	Visitors	<p>Last name, first name, patronymic</p> <p>Information on the main identity document (series, number, issue date, issuing authority)</p> <p>Date and time of the visit</p>	<p>30 days from the date of termination of maintaining the visitor log, 30 days from the date of the visit, in the part related to access requests.</p> <p>The processing of personal data shall be terminated in cases of revelation of unlawful processing of personal data, upon achievement of the purpose of processing personal data, in case of withdrawal of consent by the Data Subject for the processing of their personal data, or upon reaching the archival data retention deadlines in accordance with the legislation of the Russian Federation.</p>

No.	Processing type (automated, non-automated, mixed)	Processing purpose	Legal basis for processing	Categories of data subjects (employees, clients, counterparty representatives, visitors, etc.)	Processed personal data	Processing (storage) period or conditions for termination of processing
						Upon achievement of the processing purposes and retention deadlines, personal data shall be destroyed on both paper and electronic media (by means of repeated overwriting or physical impact).
18	Mixed	Receipt of recommendations for applicants for vacant positions	Consent to the processing of personal data	Previous supervisor of the applicant	Name, phone number	For the period from the moment of its receipt until the withdrawal of consent by the data subject. The processing of personal data shall be terminated in cases of revelation of unlawful processing of personal data, upon achievement of the purpose of processing personal data, in case of withdrawal of consent by the Data Subject for the processing of their personal data, or upon reaching the archival data retention deadlines in accordance with the legislation of the Russian Federation. Upon achievement of the processing purposes and retention deadlines, personal data shall be destroyed on both paper and electronic media (by means of repeated overwriting or physical impact).

2.2.4. Processing only those PD which correspond to the pre-declared purposes of its processing. Ensuring consistency of the content and volume of processed PD with the stated purposes of processing. Preventing the processing of PD incompatible with the purposes of PD collection, as well as PD being excessive in terms of the stated purposes of their processing. The Company does not collect or process PD that is not required to achieve the purposes specified in paragraph 2.2.2 of the Policy and does not use the PD of data subjects for any purposes other than those specified above.

2.2.5. Preventing the merging of databases containing PD, the processing of which is carried out for purposes incompatible with each other.

2.2.6. Ensuring the accuracy, adequacy, and relevance of PD in relation to the purposes of PD processing. The Company takes all reasonable measures to maintain the relevance of the processed PD, including, but not limited to, securing the right of each data subject to access their PD and demand from the Company their refinement, blocking, or destruction in the event that the PD is incomplete, outdated, inaccurate, illegally obtained, or is not necessary for the stated processing purposes.

2.2.7. Storing personal data in a form that allows identification of the data subject for no longer than required for the purposes of PD processing, unless the storage period for PD is determined by the legislation of the Russian Federation or by a contract to which the data subject is a party.

2.2.8. Destructing or depersonalizing of PD upon achievement of the stated purposes of its processing or in case the need to achieve these purposes ceases to exist, if it is impossible for the Company to eliminate violations of the procedure for processing PD established by the legislation of the Russian Federation, or in case of withdrawal of consent by the Data Subject to the processing of their PD, unless otherwise provided by the legislation of the Russian Federation or contracts with data subjects.

### **2.3. Conditions for Processing Personal Data**

2.3.1. The Company may process PD in the following cases:

2.3.1.1. With the consent of the data subject to the processing of their PD. The procedure for obtaining consent from the data subject is defined in section 2.5 of the Policy;

2.3.1.2. If the processing of PD is necessary for the implementation and fulfillment of the functions, powers, and obligations assigned to the Company by law.

2.3.1.3. For the execution of a contract to which the data subject is a party, for the conclusion of a contract at the initiative of the data subject. Such contracts include, but are not limited to, employment contracts with the Company's Employees and civil law contracts with Contractors; pre-contractual work includes personnel recruitment, where the data subject's consent to processing is confirmed by a personally completed Applicant questionnaire or a questionnaire (curriculum vitae) submitted by them to the Company, a specialized personnel recruitment organization, or posted by the Applicant on specialized websites on the Internet, or sent by the Applicant to the Company by e-mail;

2.3.1.4. If the processing of PD is necessary for the exercise of the rights and legitimate interests of the Company or third parties or for achieving socially significant goals, provided that the rights and freedoms of the data subjects are not violated;

2.3.1.5. If the processing of PD is carried out for statistical or other research purposes, provided that the PD is depersonalized;

2.3.1.6. If access to the PD by an unlimited number of persons is granted by the data subject or at their request;

2.3.1.7. If the PD is subject to publication or mandatory disclosure in accordance with the law.

2.3.2. The Company shall not disclose to third parties or disseminate PD without the consent of the data subject, unless otherwise provided by law or a contract with the data subject.

2.3.3. The Company shall not process PD relating to special categories and concerning

racial and ethnic origin, political views, religious or philosophical beliefs, health status, membership of Employees and Contractors in public associations or their trade union activities, except as expressly provided by law.

2.3.4. Processing of PD relating to criminal records may be carried out by the Company exclusively in the cases and in the manner established by law.

2.3.5. If it is necessary to transfer PD outside the Russian Federation, such transfer shall be carried out in accordance with the legislation of the Russian Federation. Before commencing the cross-border transfer of PD, it is necessary to ensure that the foreign state to whose territory the PD is to be transferred provides adequate protection of the rights of data subjects. Cross-border transfer of PD to the territories of foreign states that do not provide adequate protection of the rights of data subjects may be carried out in the following cases:

- with the written consent of the data subject to such transfer;
- as provided by international treaties and the legislation of the Russian Federation;
- for the execution of a contract to which the data subject is a party;
- to protect the life, health, or other vital interests of the data subject or other persons when it is impossible to obtain the written consent of the data subject.

2.3.6. The Company shall not make decisions that give rise to legal consequences in relation to the data subject or otherwise affect the rights and legitimate interests of the data subject based solely on automated processing of PD. Any data that have legal consequences or affect the rights and legitimate interests of the data subject are subject to verification by authorized employees of the Company before their use.

2.3.7. Placing a special mark - a “check mark” or a “web tag” in a special field on the website when filling out a PD collection form and clicking the corresponding button is unequivocally regarded as acceptance of the terms and conditions of this Policy and consent to the processing of PD in the scope, for the purposes, and in the manner provided in the text offered for review before placing the special mark.

2.3.8. The conditions for termination of PD processing include the achievement of the processing purposes, expiry of the consent, or withdrawal of consent by the data subject to the processing of their PD, as well as revelation of unlawful processing of PD.

2.3.9. The Company ensures the recording, systematization, accumulation, storage, refinement (updating, modification), retrieval, use, transfer (provision, access), dissemination, deletion, destruction of PD using databases located within the territory of the Russian Federation.

## **2.4. Confidentiality of Personal Data**

2.4.1. Employees of the Company who have access to PD shall ensure the confidentiality of such data.

2.4.2. With the consent of the data subject, the Company has the right to entrust the processing of their PD to another party, unless otherwise stipulated by law, based on an agreement concluded with such party. This agreement shall contain, as a material condition, the obligation of the party processing PD on behalf of the Company to comply with the principles and rules of PD processing stipulated by law. The scope of PD transferred to another party for processing and the number of processing methods used by this party shall be minimally necessary for the performance of its obligations to the Company. The Company’s instruction shall specify the list of actions (operations) with PD to be performed by the party processing the PD and the purposes of processing. It shall also establish the obligation of such party to maintain the confidentiality of PD and ensure the security of PD during processing, and shall specify the requirements for the protection of processed PD in accordance with Article 19 of Federal Law No. 152-FZ of July 27, 2006 “On Personal Data”.

2.4.3. The Company has the right to place its Personal Data Information System (PDIS) in a data center owned by another party. If the agreement with the data center does not permit access to the Company’s PDIS by the data center’s personnel, such arrangement is not

considered by the Company as entrusting the data center with the processing of PD and does not require the consent of the data subjects.

2.4.4. In the event that the Company entrusts the processing of PD to another party, the Company shall bear responsibility to the data subject for the actions of the said party. The party processing PD on behalf of the Company shall be liable to the Company.

## **2.5. Consent of the Data Subject to the Processing of their Personal Data**

2.5.1. In all cases, the data subject shall decide on providing their PD to the Company and give consent to their processing freely, of their own accord, and in their own interest. Consent to the processing of PD shall be specific, informed, and conscious.

2.5.2. Consent shall be provided by the data subject in any form that allows confirmation of its receipt, unless otherwise provided by law.

2.5.3. In cases stipulated by the legislation of the Russian Federation, the Company shall obtain the Employee's written consent to the processing of their personal data.

2.5.4. The employee's consent to the processing of personal data authorized by them for dissemination shall be formalized separately from other consents to the processing of their personal data, taking into account established requirements and limitations.

2.5.5. In cases stipulated by law, the consent to the processing of Personal Data may be given by a representative of the data subject.

2.5.6. In the case of obtaining the consent to the processing of Personal Data from a Representative of the data subject, the authority of said representative to give any consent on behalf of the Data Subject shall be verified by the Company.

2.5.7. In the case of the Company receiving PD from a counterparty based on an agreement concluded between them, the counterparty transferring the PD shall be responsible for the legality and accuracy of the PD, as well as for obtaining the consent of the data subjects (their representatives) to transfer their PD to the Company.

2.5.8. The Company, having received PD from a counterparty, does not assume the obligation to inform the data subjects (their representatives), whose PD has been transferred to the Company, about the commencement of PD processing, assuming that they have been informed about this by the counterparty transferring their PD when concluding the agreement with the data subject and/or when obtaining the consent for such transfer. This obligation of the counterparty shall be included in the agreement between it and the Company.

2.5.9. The Employee's consent to the processing of their personal data for the conclusion and execution of an employment contract to which the Employee is a party is not required. In cases where the basis for processing the Employee's PD is the consent, it shall be given in writing, complying with the requirements established by Part 4 of Article 9 of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data". The aforementioned consent may be given not as a separate document, but stipulated in the employment contract (or an addendum thereto), provided that it includes the information determined by Part 4 of Article 9 of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data".

2.5.10. The Contractor's consent to the processing of their Personal Data is not required, as the processing is necessary for the performance of a civil law contract to which the Contractor, i.e. the Data Subject, is a party, except in cases where it is necessary to obtain the Contractor's written consent for specific cases of PD processing.

2.5.11. The consent of Employees' Relatives is not required if the processing of their PD is carried out on the basis of federal laws (for receiving alimony, processing social benefits, providing benefits and guarantees, etc.) and is performed by the Company, as an employer, in accordance with the requirements of State statistical accounting bodies.

2.5.12. No consent of Participants, Affiliated Persons, and Persons belonging to the same group of companies as the Company for the processing of their Personal Data is required, as their processing for the purposes specified in paragraph 2.2.2 of this Policy is necessary for the exercise and fulfillment of the powers and duties assigned to the Company by law.

2.5.13. No consent of data subjects is required for the processing of PD for persons who have signed agreements with the Company, whose PD are contained in the unified state registers of legal entities and individual entrepreneurs, are open and publicly available (provided that there is information for such persons about the number, date of issue, and the issuing authority of the identity document of the individual, the stipulated PD confidentiality requirements shall apply).

2.5.14. In all other cases, it is necessary to obtain the consent of the data subjects who are Representatives of counterparties, except for persons who signed agreements with the Company, who issued powers of attorney to act on behalf of and based on the instructions of the Company's counterparties, and thereby performed implicative actions confirming their consent to the processing of PD specified in the text of the agreement and/or power of attorney. A counterparty may obtain the consent from its employee to the transfer their PD to the Company and the processing of these PD by the Company. In this case, the Company does not need to obtain the data subject's consent for the processing of their PD.

2.5.15. The consent of the Representative of the data subject to the processing of their PD shall be given in the form of implicative actions by issuing a power of attorney to act on behalf of and based on the instructions of the data subjects and a document certifying their identity.

2.5.16. The consent of Visitors to the processing of their PD is given in the form of implicative actions, either by providing their PD necessary for entering the protected territory of the Company or by transferring an identity document to security personnel.

2.5.17. Employees of companies belonging to the same group of companies as the Company give their employers the written consent to the transfer of their PD to the Company for processing for the purposes specified in paragraph 2.2 of this Policy, in accordance with the procedure provided for by Part 4 of Article 9 of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data".

2.5.18. The consent of data subjects to the provision of their PD is not required when the Company receives, within the framework of its current powers, reasoned requests from prosecution authorities, law enforcement agencies, investigative and inquiry bodies, security agencies, State labor inspectors during their State supervision and control over compliance with labor legislation, and other bodies authorized to request information in accordance with the competence provided for by law.

A reasoned request shall indicate the purpose of the request, a reference to the legal grounds for the request, including confirmation of the authority of the body that sent the request, and a list of the information requested.

2.5.19. In the event of requests from organizations that do not have the appropriate authorities, the Company shall obtain the consent in any provable form (written, i.e. according to the form determined by the Company's order, or oral, i.e. with mandatory recording of such consent by receiving an e-mail or SMS message from the address (number) specified by the data subject when providing their PD, etc.) from a data subject (who is not an employee of the Company) to provide their PD, and warn the persons receiving the PD that these data may be used only for the purposes for which they are communicated, and also require confirmation from these persons that this rule will be (has been) complied with.

2.5.20. Any consent to the processing of PD, the processing of which is not established by legal requirements or is not required for the fulfillment of a contract with the Company to which the data subject is a party, may be withdrawn by the data subject.

2.5.21. Any consent to the processing of PD authorized for dissemination shall cease to be effective upon expiry of the period specified in such consent.

2.5.22. The form of the consent of the data subject to the processing, by the Company, of their PD authorized for dissemination, given in writing in cases stipulated by law, shall be determined by order of the Company. The specified form shall comply with the conditions provided for in Article 10.1 of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data". The requirements for the content of such consent are determined by the authorized body in

charge of the protection of the rights of data subjects (Federal Service for Supervision of Communications, Information Technology, and Mass Media (Roskomnadzor)). In all cases, the obligation to provide proof of obtaining the consent of the Data Subject to the processing of their personal data or proof of the existence of grounds specified in Federal Law No. 152-FZ of July 27, 2006 “On Personal Data” shall rest with the Company.

### **3. Rights of the Data Subject**

3.1. The data subject has the right to receive information concerning the processing of their PD. The Data Subject shall be entitled to demand from the Company the refinement of their PD, their blocking or destruction if the PD are incomplete, outdated, inaccurate, unreliable, illegally obtained, or are not necessary for the stated purpose of processing, as well as to take measures provided for by law to protect their rights.

### **4. Information on Implemented Personal Data Protection Requirements**

4.1. The protection of PD processed by the Company shall be ensured by the implementation of legal, organizational, and technical measures necessary and sufficient to ensure compliance with the requirements of legislation in the field of PD protection.

4.2. Legal measures include:

4.2.1. Development of local regulatory acts of the Company implementing legislative requirements, including the Company’s Policy regarding the processing of PD;

4.2.2. Refusal to use any methods of processing PD that do not correspond to the purposes predetermined by the Company.

4.3. Organizational measures include:

4.3.1. Appointing a person responsible for organizing the processing of PD;

4.3.2. Appointing a person responsible for ensuring the security of PD in the PDIS;

4.3.3. Limiting the number of Company’s Employees who have access to PD and organizing a permissive access system;

4.3.4. Familiarizing Company’s Employees directly involved in the processing of PD with the provisions of legislation on PD, including requirements for the protection of PD, with the Policy, and other local regulatory acts of the Company on the processing of PD;

4.3.5. Training all categories of Employees directly involved in the processing of PD on the rules for working with them and ensuring the security of processed data;

4.3.6. Defining in the job descriptions of Company’s Employees their responsibilities for ensuring the security of PD processing and their responsibility for violating the established procedure;

4.3.7. Regulating PD processing procedures;

4.3.8. Organizing the accounting and storage of tangible media containing PD, ensuring the prevention of theft, substitution, unauthorized copying and destruction;

4.3.9. Determining the types of PD security threats relevant to the PDIS, taking into account the assessment of possible harm to data subjects that may be caused in case of violation of security requirements, and determining the level of PD protection;

4.3.10. Determining threats to the security of PD during their processing in the PDIS and forming a threat model (models) of PD based on them;

4.3.11. Placement of technical means for processing PD within a protected area;

4.3.12. Restricting access by unauthorized persons to the Company’s premises, preventing their presence in premises where the work with PD is carried out and technical means for their processing are located, without control by Company’s employees.

4.4. Technical measures include:

4.4.1. Implementation of PD protection requirements during their processing in the PDIS, the fulfillment of which ensures the established levels of PD protection;

4.4.2. Development, based on threat models, of a PD protection system for the levels of PD protection determined by the Government of the Russian Federation during their processing in information systems;

4.4.3. Use of information security tools (“ISTs”) that have passed the conformity assessment procedure to neutralize current threats;

4.4.4. Assessment of the effectiveness of measures taken to ensure the security of PD;

4.4.5. Implementation of a permissive access system for employees to PD processed in the PDIS, as well as to hardware and software ISTs;

4.4.6. Registration and accounting of actions with PD by PDIS users;

4.4.7. Detection of malware (using antivirus programs) on all nodes of the Company’s information systems that have the appropriate technical capabilities;

4.4.8. Secure network interaction (using firewalling);

4.4.9. Detection of intrusions into the Company’s information systems that violate or create preconditions for violating established requirements for ensuring the security of PD;

4.4.10. Encryption of PD transmitted through unsecured communication channels, including the Internet;

4.4.11. Restoration of PD modified or destroyed as a result of unauthorized access to them (a system for backing up and restoring PD);

4.4.12. Regular monitoring of user actions and investigations into incidents of violation of PD security requirements;

4.4.13. Control over the fulfillment of these requirements (independently or with the involvement, on a contractual basis, of legal entities and individual entrepreneurs licensed to carry out activities for the technical protection of confidential information) at least once every 3 years.

4.4.14. A range of measures stipulated by Decree of the Government of the Russian Federation No. 1119 of November 1, 2012 “On Approval of Personal Data Protection Requirements during Their Processing in Personal Data Information Systems” and Order No. 21 of the FSTEC of Russia of February 18, 2013 “On Approval of the Composition and Content of Organizational and Technical Measures to Ensure the Security of Personal Data during Their Processing in Personal Data Information Systems” to ensure the security of PD in the Company shall be determined in organizational and administrative documents approved by the General Director of the Company, subject to the results of the assessment of possible harm to the data subject, the relevance of PD security threats, and the established level of PD protection.

## **5. Processing of Data Subject Requests**

5.1. To ensure compliance with the rights of data subjects established by law, the Company developed and implemented a procedure for working with appeals and requests from data subjects, as well as a procedure for providing data subjects with information, as envisaged by the legislation of the Russian Federation in the field of PD.

5.2. This procedure shall ensure the compliance with the following rights of the data subject:

- the right to receive information concerning the processing of their PD;
- the right to refinement, blocking or destruction of their PD if the PD are incomplete, outdated, inaccurate, illegally obtained, or are not necessary for the stated purpose of processing.

5.3. The data subject’s request shall contain the number of the main identity document of the data subject or their legal representative, information about the date of issue of the said document and the issuing authority, information confirming the data subject’s participation in relations with the Company (contract number, date of conclusion of the contract, word designation and/or other information), or information otherwise confirming the fact of processing PD by the Company, the signature of the data subject or their representative, and the date of the request.



5.4. Company's employees do not have the right to answer questions related to the provision of PD over the phone because it is impossible to identify the caller in such cases.

5.5. Data subjects' requests may be sent by mail to Apatit, JSC by registered letter with acknowledgment of receipt or delivered in person against signature to the Company's representative responsible for PD processing.

## **6. Cookie Collection**

6.1. The Company's websites process cookies and use data analytics tools, according to the technical parameters of the tools used, for statistical analysis of service usage and to ensure their operability, both as a whole and for their individual functions.

6.2. "Cookies" mean data about users of the Company's website, accessible and collected by the Company independently or with the involvement of services [Yandex products], namely: [list of cookies: user pseudonym (identifier), user address or address of the user's device and its technical characteristics, through which the user accessed the Company's website and/or established a connection with the Company's Internet service, the operating system used on the user's device, the operating system version, as well as information about the user, including IP address, user search queries, information about the browser and language used, dates and times of access to the website, Internet addresses of web pages visited by the user, the subject of information posted on Internet resources of the Company visited by the user, device identifier, geographical location, number of pages viewed, duration of stay on the Company's website, queries that the user used when navigating to the website, pages from which transitions were made, session identifier, authorization/registration time, and any information that does not allow unambiguous identification of the user or a specific individual, for providing the user with advertising information and analytical user information].

6.3. The Company's website uses the following cookie parameters in accordance with the Cookie Policy.

6.4. The Company uses web analytics tools for the purpose of general analysis of website usage and obtaining source data for improving the services offered by the Company. The information obtained in this way may be transmitted anonymously to the web analytics service server, stored and processed there.

6.5. The information on the processed data and the privacy policy of the Organizations providing analytical services is given below:

- Yandex.Forms: [<https://forms.yandex.ru>] (Terms of Use of the Yandex.Forms service for form creators [[https://yandex.ru/legal/forms\\_creators/](https://yandex.ru/legal/forms_creators/)]; Terms of Use of the Yandex.Forms service for respondents [[https://yandex.ru/legal/forms\\_respondents/](https://yandex.ru/legal/forms_respondents/)]; Privacy Policy [<https://yandex.ru/legal/confidential/>]).

6.6. The website user can manage the cookie usage parameters independently in their browser settings.

6.7. Processed cookies are deleted when the processing purposes are achieved or when the need for processing such information is no longer present.

## **7. Final Provisions**

7.1. Other obligations and rights of the Company as a PD operator and a person organizing their processing on behalf of other operators are determined by the legislation of the Russian Federation in the field of PD.

7.2. Officials and employees of the Company guilty of violating the rules governing the processing and protection of PD shall bear material, disciplinary, administrative, civil or criminal liability in accordance with the law.