



## PRIVACY POLICY REGARDING THE PROCESSING OF USER PERSONAL DATA

Moscow

Revised on August 1, 2023

### 1. GENERAL TERMS

1.1. The operator's policy regarding personal data processing (hereinafter, the Policy) is designed to ensure the protection of rights and freedoms of the personal data subject during their personal data processing, including the protection of privacy, personal and family secrets.

1.2. Key concepts and definitions used in the Policy:

1.2.1. **Personal data** shall mean any information related to an identified or identifiable individual based on such information (personal data subject). This includes, but is not limited to, any information provided by the user such as last name, first name, middle name, phone number, email address, and other information.

1.2.2. **Personal data processing** shall mean any action or set of actions performed with or without using automation tools on personal data, including collection, recording, organization, accumulation, storage, refinement (updating, modification), extraction, use, transmission (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data. In this case, the transfer is carried out in accordance with the legal instructions of the authorized bodies or in accordance with the terms of the agreement, upon signing of which the User gives his consent to such processing.

1.2.3. **Confidentiality of personal data** shall mean a mandatory requirement for the Company's employees who have access to user personal data processing. It requires proper adherence to processing rules, storage, non-disclosure without the subject's consent or another legal basis, and ensuring the necessary preservation regime for user personal data by the Company.

1.2.4. **The use of personal data** shall mean actions or operations involving personal data, with the aim of identifying the User to grant access to the Website and verify the accuracy of the information provided by the User. Destruction of personal data shall mean actions that make it impossible to restore personal data content in the automated registration and accounting system of the Company's Customers or the physical destruction of personal data carriers. Data destruction is carried out in respect of the Customers who have no active contracts and whose data storage period has expired, or at the request of the Customer who withdraws his/her consent to personal data processing.

1.2.5. **Information** shall mean details or data, regardless of how they are presented.

1.2.6. **Company** shall mean a legal entity operating the Website — Limited Liability Company O3-Coatings (O3-Coatings LLC); Taxpayer Identification Number (INN) 7730046191; Primary State Registration Number (OGRN) 1157746116428.

1.2.7. **Website** shall mean a website located on the Internet at <https://o3.com/>

1.2.8. **Publicly available personal data** shall mean personal data accessible to the general public with the subject's consent or to which the confidentiality requirement does not apply in accordance with federal laws.

1.2.9. **Personal data operator (operator)** shall mean a Company that independently or jointly with others organizes and/or processes personal data of the Website users, with the aim of providing authorized access to all Website services, and also determines the purposes of personal data processing, the composition of personal data,



actions (operations) performed with personal data, and the procedures for storing and destroying user personal data.

1.2.10. **Consent to personal data processing** shall mean a voluntary action by the User during registration on the Company's website <https://o3.com/>, specifically by ticking the relevant box to express consent to processing the personal data provided by him/her (hereinafter, PDN), and unconditionally accepting the terms and conditions of the User Agreement and this Privacy Policy regarding PDN handling.

1.2.11. **Automated processing of personal data** shall mean the processing of personal data using computer technology.

1.2.12. **Personal data dissemination** shall mean actions that reveal personal data to general public;

1.2.13. **Personal data provision** shall mean actions that disclose personal data to a specific individual or a defined group of individuals;

1.2.14. **Personal data protection** shall mean a combination of measures (organizational, administrative, technical) designed to prevent unauthorized or accidental access, destruction, alteration, blocking, copying, distribution of the Users' personal data, and protection against other illegal activities.

1.2.15. **Personal data storage** — storage of the Users' personal data shall mean the existence of records in electronic systems (local network) and on the Company's tangible media. The Users' personal data are primarily stored on electronic media and processed using automated systems, except when manual processing of personal data is required to comply with legal obligations.

1.2.15. **Personal data blocking** shall mean the temporary halt of personal data processing (unless processing is required for personal data clarification);

1.2.16. **Personal data destruction** shall mean actions that render it impossible to restore the content of personal data in the personal data information system and/or result in the destruction of physical media containing personal data, as well as the cessation of any access to personal data.

1.2.17. **Personal data depersonalization** shall mean actions resulting in the impossibility to determine, without additional information, whether personal data belongs to a specific personal data subject;

1.3. This Privacy Policy shall become effective upon its approval and publication on the Website and shall remain in effect indefinitely until a new version of the Privacy Policy comes into force.

1.4. The Company has the right to modify the Privacy Policy at any time. In case of any changes to the Privacy Policy, the Company shall notify the Users by posting the updated version on the Website at its permanent address.

The previous versions of the Privacy Policy are kept in the Company's document archive.

1.5. The continued use of the Website by the User after the publication of the new version of the Privacy Policy is recognized by the Parties as the unconditional acceptance of the terms of the Privacy Policy in full.

## 2. PURPOSES OF PERSONAL DATA COLLECTION

2.1. Personal data processing is confined to achieving specific, pre-established, and lawful purposes. It is not permissible to process personal data in a manner that contradicts the purposes of personal data collection.



2.2. Purposes of personal data processing — performing a set of actions aimed at the implementation of the following tasks:

- creating and maintaining a User account (User account) on the Company's Website;
- identifying the User on the User's account page and providing access to the services of the Website <https://o3.com/> ;
- providing the User with information about the Company, our services and events;
- communication with the User when you contact the Company (feedback form, etc.);
- exercising the powers and duties assigned to the Company by the legislation of the Russian Federation;
- sending the Company's news materials to the User, provided that the User subscribes accordingly.

2.3. The cessation of personal data processing occurs upon the Company's dissolution or upon the User's request to delete their personal data.

2.4. Personal data are processed on the basis of the following principles:

- the legality of the purposes and methods of personal data processing;
- good faith;
- compliance of the purposes of personal data processing with the purposes defined and declared in the course of personal data collection, as well as with the powers of the Company;
- correspondence of the volume and nature of personal data processed, methods of personal data processing to the purposes of personal data processing.

### 3. LEGAL GROUNDS FOR PERSONAL DATA PROCESSING

3.1. The legal grounds for personal data processing is a set of legal acts under which and in accordance with which the Operator processes personal data: the Constitution of the Russian Federation, Articles 86–90 of the Labor Code of the Russian Federation, Legislation on Personal Data, Federal Laws and regulations adopted on their basis legal acts governing relations related to the activities of the Operator, statutory documents of the Operator, consent to personal data processing.

### 4. DATA COMPOSITION

4.1. The content and volume of the processed personal data are in line with the declared processing objectives. The processed personal data should not be excessive compared to the declared purposes of processing.

4.2. The Company hereby informs the Website users that cookies and the Yandex.Metrica service are used to enhance the Website's usability, which may access the users' personal data in relation to their use of the Website. Such personal data may comprise: email address, user's IP address, user gender. The Company does not have access to the User's personal data obtained by the services. By continuing to use the Website, the User unequivocally agrees with the policy of their application by the Company.

4.3. The personal data of Users processed by the Companies include:

4.3.1. Personal data provided by the User upon registration on the Website:

- last name, first name, middle name;
- details about phone number and email address;
- the name of the organization represented by the User and the position of the User in such organization.



To subscribe to website updates, the User simply needs to provide an email address.

4.3.2. Personal data provided in connection with the User's address to the Company with relevant requests (on PD processing, on termination of PD processing, etc.):

- the applicant's last name, first name, and middle name;
- passport information;
- details about the reasons and objectives of the inquiry;
- details about the existence of a personal account on the Website and the possibility of its identification;
- signature of the user or their representative.

4.3.3. Additional personal data from the User, provided voluntarily without the Company's request.

4.4. The Company collects and stores the data specified in clause 4.3. of this Privacy Policy in electronic form, containing information about the User obtained as a result of filling out and sending by the User the registration form established by the Company in the Personal Account on the Website, as well as the User's voluntary provision of additional information about himself/herself. The form allows the User to communicate the following to the Company:

- Last name, first name, middle name, phone number, and email address;
- consent to personal data processing;
- the User's consent to the User Agreement available on the website and accession to it by way of its acceptance.

4.5. The Company does not process special and biometric personal data of the Users.

## 5. PROCEDURE AND TERMS OF PERSONAL DATA PROCESSING

5.1. The operator processes personal data — operations performed with the use of automation tools or without the use of such tools with personal data, including the collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), depersonalization, blocking, deletion, destruction of personal data.

5.2. Personal data are processed in compliance with the principles and rules stipulated by the Federal Law "On Personal Data".

5.3. The procedure for obtaining (collecting) personal data:

5.3.1. The User personally provides all personal data voluntarily, in electronic format, as well as on paper (copies) when complying with the Company's requirements stipulated in the relevant agreements, to which the User may act as a party.

5.3.2. The User's consent to the processing of their personal data is kept in electronic format.

5.3.3. The User's consent to the processing of personal data for the purposes outlined in Section 2 of this Privacy Policy remains valid until: the processing purposes are achieved; in case of account deletion on the Website — until the deletion date; or until the User revokes his/her consent.

5.3.4. The User's personal data shall be processed without their consent in the following cases:

- personal data are publicly available;
- at the request of authorized state bodies in cases stipulated by the legislation of the Russian Federation;
- personal data processing is conducted based on the current legislation of the Russian Federation;
- personal data are processed for statistical purposes, subject to mandatory depersonalization of personal data.



5.3.5. The Company does not request or process special categories of the User's personal data: information about their race, nationality, political views, religious or philosophical beliefs, health condition, or private life.

5.4. Personal data processing is confined to achieving specific, pre-established, and lawful purposes. Only personal data that meet the purposes of their processing are subject to processing. The content and volume of the processed personal data are in line with the declared processing purposes.

5.5. Personal data processing procedure

5.5.1. The user (personal data subject) provides the Company with reliable information about himself/herself.

5.5.2. Only the Company's employees authorized to work with the User's personal data and who have signed the Non-Disclosure Agreement of the User's personal data may have access to the processing of the User personal data.

5.5.3. Employees admitted to work with personal data of Users shall perform their duties in accordance with internal local regulations, in particular, in accordance with this Privacy Policy.

With the above data, the employees were instructed on how to work with the personal data of the Users.

5.5.4. Personal data of Users may be processed only for the purposes established by the Privacy Policy and subject to the laws of the Russian Federation.

5.5.5. In determining the extent and nature of personal data to be processed, the Company follows the Constitution of the Russian Federation, personal data legislation, and other federal laws.

5.6. The Operator is entitled to delegate personal data processing to another person on the basis of an agreement concluded with this person, including a state or municipal contract.

A person processing personal data on behalf of the operator shall comply with the principles and rules for the processing of personal data stipulated by the Federal Law "On Personal Data".

Furthermore, the operator has the right to transfer personal data to the bodies of inquiry and investigation, other authorized bodies on the grounds provided for by the current legislation of the Russian Federation

5.7. Personal data protection

5.7.1. Protection of personal data of Users is carried out at the expense of the Company in accordance with the procedure established by the legislation of the Russian Federation.

5.7.2. When protecting the personal data of Users, the Company takes all necessary organizational, administrative and technical measures, including:

- antivirus protection;
- audit (monitoring) of security / vulnerability;
- management of access to the network, management of the local network, control of the Company's premises, where the personal data of the Users are stored;
- registration and accounting;
- ensuring the storage of information containing personal data of Users, excluding access to them by third parties;
- general control over compliance by employees with measures to protect the personal data of Users;



- protection of personal data of Users stored in the Company's electronic databases from unauthorized access, distortion, transfer and destruction of information, as well as from other illegal actions;
- data transfer via secure communication channels. Interfaces of information systems are protected using the HTTPS protocol with the use of end data encryption certificates during transfer between the storage server and the workstation; an impersonal form containing only IP addresses and other technical attributes of the services provided is used to transfer information to the equipment.
- persons directly involved in the processing of personal data are familiar with the provisions of the legislation of the Russian Federation on personal data, including the requirements for the protection of personal data, documents defining the policy regarding the processing of personal data, and local acts on the processing of personal data;
- a person responsible for organizing the processing of personal data has been appointed;
- models of security threats to personal data in information systems have been developed;
- accounting of machine-readable media of personal data is ensured;
- it is possible to recover personal data modified or destroyed as a result of unauthorized access to them;
- rules for access to personal data processed in the personal data information system have been developed, as well as the registration and recording of all actions performed with personal data in the personal data information system.
- internal control of compliance of personal data processing with the requirements of Federal Law of the Russian Federation No. 152 "On Personal Data" and the regulatory legal acts adopted in accordance therewith;
- the possibility of uncontrolled entry or stay of unauthorized persons in the premises where personal data are handled is excluded;
- the safety of personal data carriers and information security tools is ensured.
- to ensure the security of personal data, software and hardware that have passed the conformity assessment procedure in accordance with the established procedure.

5.8. Personal data shall be stored in a form that makes it possible to determine the personal data subject for no longer than required by the purpose of personal data processing, unless the period of storage of personal data is established by federal law or contract to which the subject of personal data is a party, beneficiary or guarantor. The processed personal data shall be destroyed or depersonalized upon achievement of the processing goals or in case of loss of the need to achieve these goals, unless otherwise stipulated by federal law.

5.9. Personal data of the Users shall be stored in electronic form on the Company's servers.

5.9.1. Protection of access to the personal data of Users is ensured by:

- using licensed antivirus programs that prevent unauthorized entry and access to the personal data of Users;
- restricting employees' access to the personal data of Users using the account;
- network firewall.

5.9.2. Responses to written requests from other organizations and institutions regarding the Users' personal data are provided solely with the User's written consent, unless otherwise established by the legislation of the Russian Federation. Responses are prepared in writing, on the Company's official letterhead, and only disclose the necessary amount of the



users' personal data. Personal data may be transferred at the official request (order) of authorized and competent state bodies without obtaining the consent of the Users.

5.10. When storing personal data, the personal data operator shall use databases located in the territory of the Russian Federation in accordance with Part 5 of Art. 18 of the Federal Law "On Personal Data".

5.11. Transfer and storage of personal data

5.11.1 The transfer of the User's personal data means the transfer of information through communication channels and/or on tangible media.

5.11.2. When transferring the User's personal data, the Company's employees shall comply with the following requirements:

- not to disclose the User's personal data to third parties for commercial purposes;
- not to disclose the User's personal data to a third party without the written consent of the User, except in cases established by the legislation of the Russian Federation;
- to inform those receiving the User's personal data that such data can only be used for the purposes they were shared for, and ensure these individuals confirm their compliance with this rule;
- grant access to personal data of Users only to specially authorized persons, while these persons shall have the right to receive only those personal data of Users that are necessary for performing specific functions;
- conduct the transfer of Users' personal data within the Company in line with this Policy, local regulatory documents, and job descriptions;
- allow Users to access their own personal data upon request or when they reach out. The Company is obliged to inform the User about the availability of personal data about him/her, as well as provide the opportunity to familiarize himself/herself with them within ten business days from the date of application.

5.12. The Company does not engage in cross-border transfers of the User's personal data.

5.13. The personal data of Users may be stored for no longer than required by the purpose of processing, unless otherwise provided for by the legislation of the Russian Federation. During the storage period, personal data may not be depersonalized or destroyed. Upon expiration of the storage period, personal data may be depersonalized and destroyed in accordance with the current legislation of the Russian Federation.

5.14. Blocking, depersonalization, destruction of the Users' personal data.

5.14.1 Personal data blocking shall mean the temporary halt of personal data processing (unless processing is required for personal data clarification); Blocking of personal data of Users is carried out with a written application of the User.

5.14.2. Blocking of Users' personal data may be temporarily lifted if it is required to comply with the legislation of the Russian Federation.

5.14.3. Unblocking of personal data of Users is carried out with their written consent (if there is a need to obtain consent) or with the User's application.

5.14.4. The User's repeated consent to the processing of his/her personal data (if necessary) entails the unblocking of his/her personal data.

5.15. Method for deleting the User's personal data

5.15.1. Upon destruction of the User's personal data, the Company's employees cannot access the personal data.

5.15.2. Personal data within the Company's system and on the Website is not recoverable.



5.15.3. Personal data destruction is irreversible.

5.15.4. The period for destruction of personal data corresponds to the period established by the legislation of the Russian Federation.

## 6. RIGHTS AND OBLIGATIONS OF THE PARTIES

6.1. The Company is entitled to:

- share the Users' personal data with third parties, as permitted by current law (tax, law enforcement agencies, judicial authorities);
- refuse to provide personal data in cases stipulated by the legislation of the Russian Federation;
- use the User's personal data without his/her consent in cases stipulated by the legislation of the Russian Federation.

6.2. The User is entitled to:

- demand that their personal data be clarified, blocked or destroyed if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as to take measures provided for by the legislation of the Russian Federation to protect their rights;
- require a list of processed personal data available in the Company and the source of their receipt;
- receive information on the periods of personal data processing, including the period of their storage;
- request that all persons who have been previously informed of incorrect or incomplete personal data of all exceptions, corrections or additions therein be notified;
- lodge a complaint with the authorized body for personal data rights protection or in court against illegal actions or inaction during the processing of their personal data.

6.3. Users have the right to send their requests to the Company, including requests regarding the use of their personal data in writing to the following address: 1 Nobel St., Premises II, Room 25, the territory of Skolkovo Innovation Center, Moscow, 121205, Russia, or electronically via the feedback form on the Website.

The request sent by the User must comply with the requirements established by the Company, namely, contain the following information:

- the applicant's last name, first name, and middle name;
- passport information;
- details about the reasons and objectives of the inquiry;
- details about the existence of a personal account on the Website and the possibility of its identification;
- signature of the user or their representative.

If necessary for a prompt and comprehensive review of the User's inquiry, the Company reserves the right to request additional information from the User.

The Company undertakes to consider and send a response to the User's request within no more than 30 days from the date of receipt of the request.

6.4. The Company employees who breach the regulations concerning the receipt, processing and protection of personal data shall bear disciplinary, administrative, civil or criminal liability in accordance with the current legislation of the Russian Federation and the internal regulations of the Company.

6.5. The Company bears civil and administrative responsibility for violation of legislation in the field of personal data processing and protection.