

## Privacy Policy

### 1. General Provisions

- 1.1. This Policy of SIBUR LLC (hereinafter referred to as the Controller) regarding the processing of personal data (hereinafter referred to as the Policy) defines the main goals, procedure and conditions for the processing of personal data by the Controller, as well as measures to ensure the security of personal data.
- 1.2. This Policy is a public document and is subject to publication on the official website of the Controller on the Internet.
- 1.3. All employees of the Controller, as well as users of the SIBUR Business Practices website are guided by the provisions of this Policy.

### 2. Definitions

- 2.1. **'Personal data'** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- 2.2. **'Controller'** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;
- 2.3. **'Processing'** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction;
- 2.4. **Dissemination of personal data** – actions aimed at disclosing personal data to an indefinite circle of persons.
- 2.5. **Provision of personal data** – actions aimed at disclosing personal data to a certain person or a certain circle of persons.
- 2.6. **Blocking of personal data** is a temporary suspension of the processing of personal data (unless the processing is necessary to clarify personal data).
- 2.7. **Destruction of personal data** – actions, as a result of which it becomes impossible to restore the content of personal data in the information system of personal data and (or) as a result of which material carriers of personal data are destroyed.

### 3. Rights and obligations of Data Controller

- 3.1. The operator has the right
  - to defend his interests in the judicial authorities;
  - with the consent of the subject of personal data, to entrust the processing of his personal data to another person, unless otherwise provided by the legislation of the European Union on personal data, federal law, on the basis of an agreement concluded with this person;
  - to provide personal data of subjects to third parties, if it is provided for by the current legislation of the European Union, the Russian Federation (transfer personal data to authorized bodies on the grounds provided for by the current legislation of the European Union, the Russian Federation);
  - to refuse to provide personal data in cases stipulated by the legislation of the European Union, the Russian Federation;
  - to use the personal data of the subject without his consent, in the cases provided for by the legislation of the European Union, the Russian Federation.

### 3.2. The operator is obliged

- to inform the subject of personal data or his representative information about the availability of personal data relating to the respective subject of personal data, as well as provide the opportunity to familiarize himself with these personal data when the subject of personal data or his representative applies, or within 30 days from the date of receipt of the request of the subject of personal data or its representative;
- to take measures necessary and sufficient to ensure the fulfillment of the obligations provided for by the legislation of the European Union on personal data, the Federal Law "On Personal Data" and the regulatory legal acts adopted in accordance with it.

## 4. Rights of subjects of personal data

Our Company would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- 1) **The right to access** – You have the right to request Our Company for copies of your personal data.
- 2) **The right to rectification** – You have the right to request that Our Company correct any information you believe is inaccurate. You also have the right to request Our Company to complete the information you believe is incomplete.
- 3) **The right to erasure** – You have the right to request that Our Company erase your personal data, under certain conditions.
- 4) **The right to restrict processing** – You have the right to request that Our Company restrict the processing of your personal data, under certain conditions.
- 5) **The right to object to processing** – You have the right to object to Our Company's processing of your personal data, under certain conditions.
- 6) **The right to data portability** – You have the right to request that Our Company transfer the data that we have collected to another organization, or directly to you, under certain conditions.

## 5. Cookies

5.1. Cookies are text files placed on your computer to collect standard Internet log information and visitor behavior information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

5.2. Our Company uses cookies in a range of ways to improve your experience on our website, including:

- Keeping you signed in;
- Understanding how you use our website;

5.3. Our website uses follow types of cookies:

- **Functionality** – Our Company uses these cookies so that we recognize you on our website and remember your previously selected preferences. These could include what language you prefer and location you are in. A mix of first-party and third-party cookies are used.
- **Advertising** – Our Company uses these cookies to collect information about your visit to our website, the content you viewed, the links you followed and information about your browser, device, and your IP address.

5.4. Use of cookies

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

## 6. The main purposes of personal data processing

The Controller processes personal data in order to:

- to ensure compliance with the law of the European Union, the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation, local regulatory acts of the Controller;
- to exercise the functions, powers and duties imposed by the law of the European Union, the legislation of the Russian Federation on the Controller;
- to regulate labor relations with employees of the Controller;
- to protect the life, health or other vital interests of the subjects of Personal data;
- to prepare, conclude, execute and terminate contracts with contractors of the Controller;
- to organize and ensure throughput and intra-facility modes, anti-terrorist security of the Controller's facilities;
- to form and maintain reference books for information support of the Controller's activities;
- to exercise the rights and legitimate interests of the Controller in the framework of the implementation of activities provided for by the Controller's Charter;
- as well as for other lawful purposes.

## **7. Categories of processed personal data and categories of subjects**

7.1. Our Company collects the following Personal data:

- Personal identification information (Name, e-mail address, phone number, etc.)

7.2. To implement the processing purposes specified in this Policy, the Controller processes the personal data of its employees, as well as other personal data subjects who are not in labor relations with the Controller, including:

- employees of the Controller, former employees, as well as their close relatives and representatives;
- job candidates;
- employees and representatives of contractors;
- visitors to the Controller's facilities and participants in events held by the Controller;
- subjects whose personal data are transferred to the Controller by third parties under the concluded agreements.

## **8. The procedure and conditions for the processing of personal data**

8.1. The Controller collects, records, systematizes, accumulates, stores, clarifies (updates, changes), retrieves, uses, transfers (distribution, provision, access), depersonalization, blocking, deletion and destruction of personal data.

8.2. The processing of personal data is carried out in the following ways:

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

8.3. The operator processes personal data with the consent of the subject of personal data to the processing of his personal data, unless otherwise provided by the legislation of the European Union, the Russian Federation

8.4. The storage of personal data of personal data subjects is carried out in a form that makes it possible to determine the subject of personal data, no longer than the purpose of their processing requires, if the storage period of personal data is not established by the legislation of the European Union, federal law, an agreement, a party to which, a beneficiary or a guarantor under which is the subject of personal data.

8.5. The conditions for terminating the processing of personal data can be:

- achieving the goals of processing personal data;

- expiration of the consent period or withdrawal of the consent of the personal data subject to the processing of his personal data;
  - termination of the Controller's activities (liquidation or reorganization).
- 8.6. When processing personal data, the Operator takes the necessary and sufficient legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unauthorized actions in relation to personal data, including:
- appointment of a person responsible for organizing the processing of personal data;
  - adoption of local regulations and other documents in the field of processing and protection of personal data;
  - identification of threats to the security of personal data during their processing in personal data information systems;
  - the use of organizational and technical measures to ensure the security of personal data during their processing in personal data information systems;
  - familiarization of the Controller's employees who directly process personal data with the provisions of the legislation of the European Union on personal data, the Russian Federation on personal data and local acts on the processing of personal data and, if necessary, organize training for these employees;
  - obtaining the consent of the subjects of personal data to the processing of their personal data, except for the cases provided for by the legislation of the European Union, the Russian Federation;
  - implementation of internal control over the measures taken to ensure the security of personal data;
  - other measures provided for by the legislation of the European Union, the Russian Federation in the field of personal data.
- 8.7. Operator's employees guilty of violating the requirements of the legislation of the European Union in the field of personal data, the Federal Law "On Personal Data" and the regulatory legal acts adopted in accordance with it, are liable in the manner prescribed by the legislation of the European Union and the Russian Federation.

## **9. Clarification, correction, deletion and destruction of personal data**

- 9.1. In case of confirmation of the fact of inaccuracy of personal data, personal data are subject to clarification by the Controller, and in case of confirmation of the fact that their processing is illegal, processing must be stopped.
- 9.2. Upon reaching the goals of processing personal data, as well as in the event that the subject of personal data revokes consent to their processing, the Controller is obliged to stop processing them or ensure the termination of such processing (if the processing of personal data is carried out by another person acting on behalf of the Controller) and in the event that the storage of personal data is no longer required for the purposes of processing personal data, destroy the personal data or ensure their destruction (if the processing of personal data is carried out by another person acting on behalf of the Controller) within a period not exceeding 30 days from the date of receipt of the said review, if:
- otherwise is not provided for by the contract, the party to which, the beneficiary or the guarantor of which is the subject of personal data;
  - The Controller is not entitled to carry out processing without the consent of the subject of personal data;
  - otherwise is not provided by the agreement between the Controller and the subject of personal data.
- 9.3. If it is not possible to destroy Personal data within the period specified in clause 9.2, the Controller blocks such personal data and ensures the destruction of personal data within a period of not more than 6 months, unless another period is established by the law of the European Union, federal laws.

## **10. Changes to privacy policy**

Our Company keeps its Privacy policy under regular review and places any updates on this web page. This privacy policy was last updated on 26 January 2021.

## **11. How to contact us**

If you have any questions about Our Company's privacy policy, the data we hold on you, or you would like to exercise one of your data protection rights, please do not hesitate to contact us.

**Email us at:** [business\\_practices@sibur.ru](mailto:business_practices@sibur.ru)

**Call us:** phone: +74957775500,4928 (Anastasia Salnikova)