

## Personal data processing policy

### 1. General provisions

1.1. This Policy regarding the processing of personal data (hereinafter referred to as the Policy) has been developed in accordance with the requirements of paragraph 2, part 1, article 18.1 of Federal Law No. 152-FZ dated July 27, 2006, "On Personal Data" (hereinafter referred to as the Law) in order to ensure the protection of human and civil rights and freedoms when processing personal data, including the protection of the right to privacy and personal and family secrets.

1.2. The Policy applies to all personal data processed by JSC "KRISTALL" (hereinafter referred to as the Operator).

1.3. The Policy applies to relations in the field of personal data processing that arose at the Operator both before and after the approval of this Policy.

1.4. In accordance with the requirements of part 2, article 18.1 of the Law, this Policy is published in free access by posting it on the Operator's website on the Internet at <https://kristall-jsc.com/en>, as well as on the information board on the Operator's premises at the following address:

Sverdlovsk region, Ekaterinburg, Mashinostroiteley st., bld. 19;

Sverdlovsk region, Verkhnyaya Pyshma, Lermontova st., 15B.

1.5. Key terms used in the Policy:

**personal data** - any information relating directly or indirectly to a specific or identifiable natural person (data subject);

**personal data controller (controller)** - a state body, municipal body, legal entity or natural person who, independently or jointly with other persons, organizes and/or carries out the processing of personal data, as well as determines the purposes of personal data processing, the composition of personal data to be processed, and the actions (operations) performed with personal data;

**processing of personal data** - any action (operation) or set of actions (operations) with personal data, performed with or without the use of automation tools. The processing of personal data includes, among other things:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- clarification (updating, modification);
- extraction;
- use;
- transfer (distribution, provision, access);
- depersonalization;
- blocking;
- deletion;
- destruction.

**automated processing of personal data** - processing of personal data using computer technology;

**dissemination of personal data** - actions aimed at disclosing personal data to an indefinite group of persons;

**Manager** – the sole executive body of the Operator;

**provision of personal data** – actions aimed at disclosing personal data to a specific person or a specific group of persons;

**blocking of personal data** - temporary suspension of the processing of personal data (except in cases where processing is necessary to clarify personal data);

**destruction of personal data** - actions that make it impossible to restore the content of personal data in the personal data information system and (or) that result in the destruction of physical media containing personal data;

**depersonalization of personal data** - actions that make it impossible to determine the ownership of personal data to a specific subject of personal data without using additional information;

**personal data information system** - a set of personal data contained in databases and information technologies and technical means that ensure their processing.

#### 1.6. Basic rights and obligations of the Operator.

##### 1.6.1. The Operator has the right to:

- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations provided for by the Personal Data Law and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws;
- entrust the processing of personal data to another person with the consent of the subject of personal data, unless otherwise provided by federal law, on the basis of a contract concluded with that person. A person processing personal data on behalf of the Operator is obliged to comply with the principles and rules for the processing of personal data provided for by the Personal Data Law, to maintain the confidentiality of personal data, and to take the necessary measures to ensure the fulfillment of the obligations provided for by the Personal Data Law;
- in the event that the subject of personal data withdraws their consent to the processing of personal data, the Operator has the right to continue processing personal data without the consent of the subject of personal data if there are grounds specified in the Personal Data Law.

##### 1.6.2. The Operator is obliged to:

- organize the processing of personal data in accordance with the requirements of the Personal Data Law;
- respond to requests and inquiries from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
- provide the authorized body for the protection of the rights of personal data subjects (the Federal Service for Supervision of Communications, Information Technology and Mass Media (Roskomnadzor)) with the necessary information at its request within 10 working days from the date of receipt of such a request. This period may be extended, but not by more than five working days. To do so, the Operator must send Roskomnadzor a reasoned notification stating the reasons for extending the deadline for providing the requested information;
- in accordance with the procedure established by the federal executive authority responsible for security, ensure interaction with the state system for detecting, preventing, and eliminating the consequences of computer attacks on the information resources of the Russian Federation, including informing it of computer incidents that have resulted in the unlawful transfer (provision, distribution, access) of personal data.

##### 1.7. Basic rights of the subject of personal data. The subject of personal data has the right to:

- receive information regarding the processing of their personal data, except in cases provided for by federal laws. The information shall be provided to the data subject by the Operator in an accessible form and shall not contain personal data relating to other data subjects, except where there are legitimate grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Personal Data Law;
- require the Operator to clarify, block, or destroy their personal data if the personal data is incomplete, outdated, inaccurate, illegally obtained, or unnecessary for the stated purpose of processing, as well as take measures provided for by law to protect their rights;

- give prior consent to the processing of personal data for the purpose of promoting goods, works, and services on the market;
- appeal to Roskomnadzor or in court against the unlawful actions or inaction of the Operator in processing their personal data.

1.8. Compliance with the requirements of this Policy is monitored by an authorized person responsible for organizing the processing of personal data at the Operator.

1.9. Liability for violation of the requirements of the legislation of the Russian Federation and the Operator's regulatory acts in the field of personal data processing and protection is determined in accordance with the legislation of the Russian Federation.

## 2. Purposes of collecting personal data

2.1. The processing of personal data is limited to the achievement of specific, predefined, and legitimate purposes. The processing of personal data that is incompatible with the purposes for which the personal data was collected is not permitted.

2.2. Only personal data that meets the purposes of its processing shall be processed.

2.3. The Operator processes personal data for the following purposes:

- maintaining personnel and accounting records;
- recruiting personnel (applicants) for vacant Operator positions;
- preparing, concluding, and executing civil law contracts;
- ensuring access control to the Operator's territory;
- maintaining military records;
- ensuring compliance with the labor legislation of the Russian Federation;
- ensuring compliance with the tax legislation of the Russian Federation;
- ensuring compliance with the pension legislation of the Russian Federation;
- voluntary medical insurance;
- promoting goods, works, and services on the market;
- ensuring the completion of introductory, industrial, or pre-graduation internships based on an agreement with an educational institution;
- ensuring personal safety (briefings);
- safeguarding the employer's property (video surveillance data and access control system);
- other purposes provided for by the current legislation of the Russian Federation.

2.4. Personal data may be processed solely for the purpose of ensuring compliance with laws and other regulatory legal acts.

## 3. Legal basis for processing personal data

3.1. The legal basis for the processing of personal data is a set of regulatory legal acts, in accordance with which and pursuant to which the Operator processes personal data, including:

- Constitution of the Russian Federation;
- Civil Code of the Russian Federation;
- Labor Code of the Russian Federation;
- Tax Code of the Russian Federation;
- Federal Law No. 152-FZ of July 27, 2006, "On Personal Data";
- Federal Law No. 402-FZ of December 6, 2011, "On Accounting";
- Federal Law No. 167-FZ of December 15, 2001, "On Mandatory Pension Insurance in the Russian Federation";
- Federal Law No. 149-FZ of July 27, 2006, "On Information, Information Technologies, and Information Protection";
- Resolution of the Government of the Russian Federation No. 719 of November 27, 2006, "On the Approval of the Regulations on Military Registration";

- Decree of the Government of the Russian Federation No. 687 dated September 15, 2008 “On Approval of the Regulations on the Specifics of Personal Data Processing Carried Out Without the Use of Automation Tools”;
  - other regulatory legal acts governing relations related to the Operator's activities.
- 3.2. The legal basis for the processing of personal data also includes:
- Operator's Charter;
  - agreements concluded between the Operator and personal data subjects;
  - consent of personal data subjects to the processing of their personal data.

#### 4. Scope and categories of personal data processed, categories of personal data subjects

4.1. The content and scope of the personal data processed must correspond to the stated purposes of processing provided for in Section 2 of this Policy. The personal data processed must not be excessive in relation to the stated purposes of its processing.

4.2. The Operator may process the personal data of the following categories of personal data subjects:

4.2.1. Former employees, employees, their relatives, job applicants, personal data subjects who have given their consent to the cross-border transfer of personal data - for the purposes of personnel and accounting records, including the implementation of directly related legal relations, including labor, tax, and pension relations:

- surname, first name, patronymic;
- year of birth;
- month of birth;
- date of birth;
- place of birth;
- marital status;
- social status;
- financial status;
- income;
- gender;
- email address;
- residential address;
- registered address;
- telephone number;
- SNILS (individual insurance account number);
- INN (taxpayer identification number);
- citizenship;
- identity document details;
- driver's license details;
- data from an identity document issued outside the Russian Federation;
- data from a birth certificate;
- bank card details;
- current account number;
- personal account number;
- profession;
- job title;
- information about employment (including length of service, current employment details, including the name and bank account number of the organization);
- relationship to military service, information about military registration;
- information about education;

- other personal data necessary to comply with applicable law.

4.2.2. Job seekers - for the purpose of recruiting personnel for vacant Operator positions and forming a personnel reserve:

- surname, first name, patronymic;
- year of birth;
- month of birth;
- date of birth;
- place of birth;
- gender;
- email address;
- residential address;
- registered address;
- telephone number;
- profession;
- information about employment;
- information about education;
- other personal data provided by the subject of personal data.

4.2.3. Beneficiaries under contracts, customers, and counterparties of the Operator, including their representatives, for the purpose of carrying out statutory activities, including the preparation, conclusion, and execution of contracts:

- last name, first name, patronymic;
- year of birth;
- month of birth;
- date of birth;
- place of birth;
- email address;
- residential address;
- registration address;
- phone number;
- TIN;
- identity document details;
- bank card details;
- current account number;
- personal account number;
- position;
- other personal data provided by the data subject.

4.2.4. Employees, applicants, contractors, contractor representatives, customers—for the purpose of ensuring access control to the Operator's premises:

- surname, first name, patronymic;
- year of birth;
- month of birth;
- date of birth;
- place of birth;
- identity document details;
- position;
- image data obtained using photo and video devices, on the basis of which the person's identity can be established and which are used by the operator to establish the identity of the subject of personal data;
- other personal data provided by the subject of personal data.

4.2.5. Employees - for the purpose of military registration:

- surname, first name, patronymic;
- year of birth;
- month of birth;
- date of birth;
- place of birth;
- marital status;
- gender;
- address of residence;
- profession;
- Position;
- Information about employment;
- Attitude to military service, information about military registration;
- Information about education;
- Information about health;
- Other personal data necessary to comply with the requirements of current legislation.

4.2.6. Employees and former employees - for the purposes of voluntary health insurance:

- Last name, first name, patronymic;
- Year of birth;
- Month of birth;
- Date of birth;
- Place of birth;
- Gender;
- Email address;
- Residential address;
- Registered address;
- Phone number;
- SNILS;
- TIN;
- citizenship;
- identity document details;
- bank card details;
- current account number;
- personal account number;
- other personal data provided by the data subject.

4.2.7. Website visitors - for the purpose of promoting goods, works, and services on the market:

- surname, first name, patronymic;
- email address;
- telephone number;
- information collected through metric programs;
- other personal data provided by the data subject.

4.2.8. Employees - for the purpose of providing introductory, industrial, or pre-graduation internships based on an agreement with an educational institution:

- surname, first name, patronymic;
- year of birth;
- month of birth;
- date of birth;
- place of birth;
- gender;
- email address;

- residential address;
- registered address;
- telephone number;
- TIN;
- citizenship;
- identity document details;
- identity document details outside the Russian Federation;
- education details;
- other personal data provided by the data subject.

4.2.9. Employees and former employees - for the purpose of ensuring personal safety (briefings):

- surname, first name, patronymic;
- year of birth;
- month of birth;
- date of birth;
- place of birth;
- gender;
- email address;
- residential address;
- registered address;
- telephone number;
- citizenship;
- identity document details;
- job title;
- other personal data provided by the data subject.

4.2.10. Employees, their relatives, job applicants, dismissed employees, contractors, their representatives, customers—for the purpose of safeguarding the employer's property (video surveillance data and access control system data):

- surname, first name, patronymic;
- year of birth;
- month of birth;
- date of birth;
- place of birth;
- identity document details;
- position;
- photo or video image of the person;
- image data of the person obtained using photo or video devices, on the basis of which their identity can be established and which are used by the operator to establish the identity of the subject of personal data;
- other personal data provided by the subject of personal data.

4.3. The operator processes personal data in the following ways:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- clarification (updating, modification);
- extraction;
- use;
- transfer (distribution, provision, access);
- blocking;

- deletion;
- destruction.

4.4. The processing of biometric personal data (information that characterizes the physiological and biological characteristics of a person, on the basis of which their identity can be established) by the Operator is carried out in accordance with the legislation of the Russian Federation.

4.5. The operator does not process special categories of personal data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, health, or sex life, except in cases provided for by Russian law.

## 5. Procedure and conditions for processing personal data

5.1. Personal data is processed by the Operator in accordance with the requirements of the legislation of the Russian Federation.

5.2. Personal data is processed with the consent of the subjects of personal data for the processing of their personal data, as well as without such consent in cases provided for by the legislation of the Russian Federation.

5.3. The operator processes personal data for each purpose of processing in the following ways:

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

5.4. Employees of the Operator whose job responsibilities include the processing of personal data are authorized to process personal data.

5.5. The processing of personal data for each processing purpose specified in section 2.3 of the Policy is carried out by means of:

- obtaining personal data in oral and written form directly from the subjects of personal data;
- entering personal data into the Operator's logs, registers, and information systems;
- using other methods of processing personal data.

5.6. Disclosure to third parties and dissemination of personal data without the consent of the data subject is not permitted, unless otherwise provided by federal law. Consent to the processing of personal data authorized by the data subject for dissemination shall be formalized separately from other consents of the data subject to the processing of his or her personal data.

The requirements for the content of consent to the processing of personal data authorized by the data subject for distribution are approved by Order of Roskomnadzor No. 18 of 24 February 2021 "On the approval of requirements for the content of consent to the processing of personal data authorized by the data subject for distribution".

5.7. The transfer of personal data to investigative authorities, the Federal Tax Service, the Russian Social Fund, and other authorized executive authorities and organizations is carried out in accordance with the requirements of Russian Federation legislation.

5.8. The operator shall take the necessary legal, organizational, and technical measures to protect personal data from unlawful or accidental access, destruction, alteration, blocking, distribution, and other unauthorized actions, including:

- identifies threats to the security of personal data during its processing;
- adopts local regulations and other documents governing relations in the field of personal data processing and protection;
- appoints persons responsible for ensuring the security of personal data in the Operator's structural units and information systems;
- creates the necessary conditions for working with personal data;
- organizes the accounting of documents containing personal data;
- organizes work with information systems in which personal data is processed;



- stores personal data in conditions that ensure its safety and prevent unauthorized access to it;
- organizes training for the Operator's employees who process personal data.

5.9. The operator shall store personal data in a form that allows the identification of the data subject for no longer than is necessary for each purpose of personal data processing, unless the storage period for personal data is established by federal law or contract.

5.9.1. Personal data on paper is stored by the Operator for the duration specified by Russian archival legislation (Federal Law No. 125-FZ of October 22, 2004, "On Archival Matters in the Russian Federation," List of standard administrative archival documents generated in the course of the activities of state bodies, local government bodies, and organizations, with an indication of their storage periods (approved by Order of the Russian Archives Agency No. 236 of December 20, 2019 "On the Approval of the List of Standard Administrative Archival Documents Generated in the Course of the Activities of State Bodies, Local Self-Government Bodies, and Organizations, with an Indication of Their Storage Periods"))).

5.9.2. The storage period for personal data processed in personal data information systems corresponds to the storage period for personal data on paper media.

5.10. The operator shall cease processing personal data in the following cases:

- unlawful processing has been identified. Deadline: within three working days from the date of identification;
- the purpose of processing has been achieved;
- the term of validity has expired or the consent of the personal data subject to the processing of the specified data has been withdrawn, when, according to the Law, the processing of such data is permitted only with consent.

5.11. Upon achieving the purposes of personal data processing, as well as in the event that the data subject withdraws their consent to the processing of their personal data, the Operator shall cease processing such data if:

- unless otherwise provided by a contract to which the personal data subject is a party, beneficiary, or guarantor;
- The Operator shall not be entitled to process personal data without the consent of the personal data subject on the grounds provided for by the Law or other federal laws;
- unless otherwise provided by another agreement between the Operator and the personal data subject.

5.12. When a data subject contacts the Operator with a request to terminate the processing of personal data within a period not exceeding 10 working days from the date of receipt of the relevant request by the Operator, the processing of personal data shall be terminated, except in cases provided for by law. The specified period may be extended, but not by more than five working days. To do this, the Operator must send the personal data subject a reasoned notification indicating the reasons for the extension of the period.

5.13. When collecting personal data, including via the Internet information and telecommunications network, the Operator shall ensure the recording, systematization, accumulation, storage, clarification (updating, modification), and extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except in cases specified in the Law on Personal Data.

5.14. The operator uses the following information systems:

- 1C: Accounting;
- Corporate email;
- Kontur Diadoc.

6. Updating, correcting, deleting, destroying personal data, responding to requests from data subjects for access to personal data

6.1. Confirmation of the fact that personal data is being processed by the Operator, the legal grounds and purposes of personal data processing, as well as other information specified in Part 7 of Article 14 of the Law, shall be provided by the Operator to the personal data subject or his representative within 10 working days from the date of receipt of the request from the personal data subject or his representative. This period may be extended, but not by more than five working days. To do so, the Operator must send the data subject a reasoned notification stating the reasons for extending the period for providing the requested information.

The information provided does not include personal data relating to other data subjects, except where there are legitimate grounds for disclosing such personal data.

The request must contain:

- the number of the main document certifying the identity of the personal data subject or his representative, information about the date of issue of the specified document and the issuing authority;
- information confirming the personal data subject's relationship with the Operator (contract number, date of contract conclusion, conditional verbal designation and/or other information), or information otherwise confirming the fact of personal data processing by the Operator;
- signature of the personal data subject or their representative.

The request may be sent in the form of an electronic document and signed with an electronic signature in accordance with the legislation of the Russian Federation.

The operator shall provide the information specified in Part 7 of Article 14 of the Law to the subject of personal data or his representative in the form in which the relevant application or request was sent, unless otherwise specified in the application or request.

If the request (application) of the personal data subject does not contain all the necessary information in accordance with the requirements of the Personal Data Law, or if the subject does not have the right to access the requested information, a reasoned refusal shall be sent to him.

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

6.2. In the event that inaccurate personal data is identified when a data subject or their representative contacts the Operator, either at their request or at the request of Roskomnadzor, the Operator shall block the personal data relating to that data subject from the moment of such a request or receipt of the specified request for the period of verification, if the blocking of personal data does not violate the rights and legitimate interests of the personal data subject or third parties.

If the inaccuracy of the personal data is confirmed, the Operator shall, on the basis of the information provided by the personal data subject or his representative or Roskomnadzor, or other necessary documents, correct the personal data within seven working days from the date of submission of such information and unblock the personal data.

6.3. In the event of unlawful processing of personal data being identified in response to a request from the data subject or their representative, or from Roskomnadzor, the Operator shall block the unlawfully processed personal data relating to that data subject from the moment of such a request or receipt of the request.

6.4. If the Operator, Roskomnadzor, or another interested party discovers unlawful or accidental transfer (provision, distribution) of personal data (access to personal data) that has resulted in a violation of the rights of personal data subjects, the Operator shall:

- Within 24 hours - notifies Roskomnadzor about the incident, the alleged causes that led to the violation of the rights of personal data subjects, the alleged harm caused to the rights of personal data subjects, and the measures taken to eliminate the consequences of the incident, as well as provide information about the person authorized by the Operator to interact with Roskomnadzor on issues related to the incident;

- within 72 hours - notifies Roskomnadzor of the results of the internal investigation of the identified incident and provides information about the persons whose actions caused it (if any).

6.5. Procedure for the destruction of personal data by the Operator.

6.5.1. Conditions and terms for the destruction of personal data by the Operator:

- achievement of the purpose of personal data processing or loss of the need to achieve this purpose - within 30 days;
- achievement of the maximum storage periods for documents containing personal data - within 30 days;
- the data subject (or their representative) provides confirmation that the personal data has been obtained unlawfully or is not necessary for the stated purpose of processing - within seven working days;
- the data subject withdraws their consent to the processing of their personal data if its storage for the purpose of processing is no longer required - within 30 days.

6.5.2. Upon achieving the purpose of processing personal data, as well as in the event that the data subject withdraws their consent to the processing of their personal data, the personal data shall be destroyed if:

- unless otherwise provided by a contract to which the data subject is a party, beneficiary, or guarantor;
- The Operator shall not be entitled to process personal data without the consent of the data subject on the grounds provided for by the Personal Data Law or other federal laws;
- unless otherwise provided for by another agreement between the Operator and the data subject.

6.5.3. The destruction of personal data is carried out by a commission established by order of the Head of the Operator.

6.5.4. The methods for destroying personal data are established in the Operator's local regulations.

## 7. Final provisions

7.1. The Policy was approved by Order of the Operator's Head No. 1-PDn dated July 3, 2025, and shall remain in effect indefinitely until the new version of the Policy comes into force.

7.2. In the event of changes to Russian Federation legislation in the field of personal data protection, the Operator shall adopt a new version of the Policy taking into account the changes. Until that moment, the Policy shall remain in force insofar as it does not contradict the current legislation of the Russian Federation.

7.3. The following contact details can be used to contact the Operator:

tel. 89126247373;

e-mail: [aas@kristall-jsc.com](mailto:aas@kristall-jsc.com);

mailing address: 620012, Sverdlovsk region, Ekaterinburg, Mashinostroiteley st., bld. 19, office