

## **personal data processing POLICY**

### **1. General provisions**

1.1. This Personal Data Processing Policy (the “Policy”) has been adopted by DSM Group Joint Stock Company (Taxpayer Identification Number (INN) 7707591431; Primary State Registration Number (OGRN) 1067746709733) (the “Operator”) in accordance with the Constitution of the Russian Federation, Federal Law No. 152-FZ dated 27.07.2006 “On Personal Data” (the “Personal Data Law”), the Labour Code of the Russian Federation, and other applicable federal laws and regulatory legal acts governing the processing of personal data and ensuring their security and confidentiality.

1.2. The Policy establishes the general framework, principles and conditions governing the processing of personal data by the Operator and ensures the protection of the rights of personal data subjects in connection with such processing.

1.3. The Policy applies to all personal data processed in the course of the Operator’s activities, whether processed by automated means or without the use of such means.

### **2. Key Definitions**

2.1. **“Personal Data”** means any information relating to an identified or identifiable natural person (a personal data subject).

2.2. **“Processing of Personal Data”** means any operation or set of operations performed on personal data, whether or not by automated means. Processing of Personal Data includes, inter alia:

- collection;
- recording;
- systematisation;
- accumulation;
- storage;
- updating (including modification and amendment);
- retrieval;
- use;
- transfer (including dissemination, provision and granting of access);
- depersonalisation (anonymisation);
- blocking;
- deletion;
- destruction.

2.3. **“Automated Processing of Personal Data”** means the processing of personal data using computer technology.

2.4. **“Dissemination of Personal Data”** means actions aimed at disclosing personal data to an indefinite number of persons.

2.5. **“Provision of Personal Data”** means actions aimed at disclosing personal data to a specific person or a defined group of persons.

2.6. **“Blocking of Personal Data”** means the temporary suspension of the processing of personal data, except where such processing is required for the clarification of personal data.

2.7. **“Deletion of Personal Data”** means the removal of personal data from information systems while preserving the possibility of their subsequent restoration.

2.8. **“Destruction of Personal Data”** means actions resulting in the impossibility of restoring the content of personal data within a personal data information system and/or resulting in the destruction of physical media containing personal data.

2.9. **“Depersonalisation (Anonymisation) of Personal Data”** means actions rendering it impossible, without the use of additional information, to attribute personal data to a specific personal data subject.

2.10. **“Personal Data Information System”** means a set of personal data contained in databases, together with the information technologies and technical means ensuring their processing.

2.11. **“Personal Data Operator” (the “Operator”)** (*for the purposes of this Policy*) means DSM Group Joint Stock Company (Taxpayer Identification Number (INN) 7707591431; Primary State Registration Number (OGRN) 1067746709733), which independently or jointly with other persons organises and/or carries out the processing of personal data and determines the purposes of such processing, the scope of personal data to be processed, and the operations performed on such data.

2.12. **“Website”** means a set of graphic and informational materials, as well as computer programs and databases, ensuring their availability via the Internet at the following addresses: <https://dsm.ru> <https://mice.dsm.ru> <https://gifts.dsm.ru> <https://pharmligaforum.ru> <https://pharmacy.dsm.ru/> <https://pharmacy.dsm.ru/https://dsmice.dsm.ru> <https://dsmice.dsm.ruhttps://viewer.dsm.ruhttps://viewer.dsm.ru>

2.13. **“User”** means any visitor of the following websites: <https://dsm.ru> <https://mice.dsm.ru> <https://gifts.dsm.ru> <https://pharmligaforum.ru> <https://pharmacy.dsm.ru/> <https://dsmice.dsm.ru> <https://viewer.dsm.ruhttps://viewer.dsm.ru>

### **3. Key Rights and Obligations of the Personal Data Operator**

3.1. The Operator shall have the right to:

- independently determine the composition and list of measures necessary and sufficient to ensure compliance with the obligations established by the Personal Data Law and the regulatory legal acts adopted pursuant thereto, unless otherwise provided by the Personal Data Law or other federal laws;
- entrust the processing of personal data to another person, subject to the consent of the personal data subject, unless otherwise provided by federal law, on the basis of a contract entered into with such person. Any person processing personal data on behalf of the Operator shall comply with the principles and rules of personal data processing established by the Personal Data Law.
- Where a personal data subject withdraws consent to the processing of personal data, the Operator shall be entitled to continue processing such personal data without consent where there are legal grounds specified in the Personal Data Law.

3.2. The Operator shall:

- ensure that personal data is processed in compliance with applicable personal data legislation;
- provide the personal data subject, upon request, with information relating to the processing of his or her personal data in accordance with the requirements of the Personal Data Law;
- where the provision of personal data and/or the obtaining of consent to its processing is mandatory under federal law, inform the personal data subject of the legal consequences of refusal to provide such data and/or to give such consent;
- when collecting personal data, including via the Internet, ensure that the recording, systematisation, accumulation, storage, updating (modification, amendment) and retrieval of personal data of citizens of the Russian Federation is carried out using databases located within the territory of the Russian Federation, except in cases permitted by the Personal Data Law;

- take measures necessary and sufficient to ensure compliance with the obligations established by the Personal Data Law and the regulatory legal acts adopted pursuant thereto;
- publish, or otherwise ensure unrestricted access to, this Policy and information on the implemented personal data protection measures.
- take the necessary legal, organisational and technical measures, or ensure that such measures are taken, to protect personal data against unauthorised or accidental access, destruction, alteration, blocking, copying, provision, dissemination, as well as against any other unlawful actions in relation to personal data.
- perform other obligations provided for by the Personal Data Law and other regulatory legal acts.

#### **4. Key Rights and Obligations of the Personal Data Subject**

4.1. The personal data subject shall have the right to:

- obtain information relating to the processing of his or her personal data, except where otherwise provided by federal laws. Such information shall be provided to the personal data subject by the Operator in an accessible form and shall not include personal data relating to other personal data subjects, except where there are lawful grounds for disclosure of such personal data. The scope of such information and the procedure for obtaining it are established by the Personal Data Law.
- require the Operator to update, block or destroy his or her personal data where such data is incomplete, outdated, inaccurate, unlawfully obtained or not necessary for the stated purpose of processing, and to take measures provided by law to protect his or her rights.
- where the personal data subject believes that the Operator processes his or her personal data in violation of the Personal Data Law or otherwise infringes his or her rights and freedoms, the personal data subject shall have the right to challenge the actions or omissions of the Operator before the competent authority for the protection of the rights of personal data subjects or in court.

The personal data subject may exercise the right to obtain information relating to the processing of his or her personal data, as well as the right to request updating, blocking or destruction of such data, by submitting a request to the Operator marked “Regarding Personal Data Processing”:

- by registered mail or by hand delivery to: 8 Pravdy Street, Building 7, Moscow, 125124;
- by email: [policy@dsm.ru](mailto:policy@dsm.ru).

In both cases, the request shall comply with the requirements set out in Section 8 of this Policy.

4.2. The personal data subject shall provide the Operator with accurate personal data.

4.3. Persons who provide the Operator with inaccurate information about themselves or information about another personal data subject without that subject’s consent shall bear liability in accordance with the legislation of the Russian Federation.

#### **5. Procedure and Conditions for Personal Data Processing**

5.1. Personal data shall be processed by the Operator with the consent of the personal data subject, unless otherwise provided by the legislation of the Russian Federation in the field of personal data, using the following methods:

- non-automated processing of personal data;
- automated processing of personal data, with or without transmission of the obtained information via information and telecommunications networks;
- mixed processing of personal data.

5.2. The processing of personal data by the Operator shall be limited to the achievement of specific, predetermined and lawful purposes. Only personal data that is relevant to the purposes of processing shall be processed.

5.3. Only those employees of the Operator whose job responsibilities include personal data processing shall be granted access to personal data.

5.4. Personal data shall be stored in a form allowing identification of the personal data subject for no longer than is required for the purposes of processing, unless the retention period is established by federal law or by an agreement to which the personal data subject is a party, beneficiary or guarantor.

Personal data in hard copy form shall be stored for the retention periods established by the archival legislation of the Russian Federation.

The retention period for personal data processed within personal data information systems shall correspond to the retention period applicable to personal data in hard copy form.

5.5. The Operator shall have the right to entrust the processing of personal data (including processing in Customer Relationship Management (CRM) systems) to another person, subject to the consent of the personal data subject, unless otherwise provided by federal law, on the basis of a contract concluded with such person (the "Operator's Instruction").

A person processing personal data on behalf of the Operator shall comply with the statutory principles and rules of personal data processing, maintain the confidentiality of personal data, and take the necessary measures to ensure compliance with statutory obligations in the field of personal data processing.

A person processing personal data on behalf of the Operator shall not be required to obtain the consent of the personal data subject for such processing.

Where the Operator entrusts the processing of personal data to another person, the Operator shall remain liable to the personal data subject for the actions of such person. The person processing personal data on behalf of the Operator shall be liable to the Operator.

5.6. Personal data processing shall be terminated in the following cases:

- upon identification of unlawful actions involving personal data, until such violations are remedied;
- upon achievement of the purpose of personal data processing;
- upon withdrawal by the personal data subject of consent to the processing of personal data or expiry of such consent;
- upon termination of the Operator's activities.

5.7. Employees of the Operator who have been granted access to personal data shall not disclose or disseminate such data to third parties without the consent of the personal data subject, unless otherwise provided by federal law.

5.8. The Operator shall take measures necessary and sufficient to ensure compliance with the obligations established by the Personal Data Law and the regulatory legal acts adopted pursuant thereto.

## **6. Principles of Personal Data Processing**

6.1. Personal data shall be processed on a lawful and fair basis.

6.2. Personal data processing shall be limited to the achievement of specific, predetermined and lawful purposes. Processing of personal data incompatible with the purposes for which such data was collected shall not be permitted.

6.3. The consolidation of databases containing personal data processed for incompatible purposes shall not be permitted.

6.4. Only personal data that is relevant to the purposes of processing shall be processed.

6.5. The content and scope of processed personal data shall correspond to the stated purposes of processing. The processing of personal data that is excessive in relation to the stated purposes shall not be permitted.

6.6. When processing personal data, accuracy, sufficiency and, where necessary, relevance of personal data in relation to the purposes of processing shall be ensured. The Operator shall take necessary measures and/or ensure that such measures are taken to delete or update incomplete or inaccurate data.

6.7. Personal data shall be stored in a form allowing identification of the personal data subject for no longer than is required for the purposes of processing, unless the retention period is established by federal law or by an agreement to which the personal data subject is a party, beneficiary or guarantor. Processed personal data shall be destroyed or anonymised upon achievement of the purposes of processing or where such purposes are no longer required, unless otherwise provided by federal law.

### **7. Purposes of Personal Data Processing**

Purpose No. 1	Maintenance of personnel and accounting records
Categories of Personal Data Subjects	Employees Former employees
Categories of Personal Data	1) General personal data: surname, name, patronymic; year of birth; month of birth; date of birth; place of birth; income; residential address; registered address; telephone number; Insurance Number of an Individual Personal Account (SNILS); Taxpayer Identification Number (INN); citizenship; identity document details; bank card details; profession; position; employment history (including length of service and current employment details specifying the name of the organisation and its settlement account); military service status; military registration data; education details. 2) Biometric personal data (data characterising physiological and biological features of a person on the basis of which his or her identity can be established): not processed. 3) Special categories of personal data: not processed.
Legal Grounds for Personal Data Processing	Personal data is processed with the consent of the personal data subject; personal data processing is necessary for the performance of a contract to which the personal data subject is a party, beneficiary or guarantor, as well as for the conclusion of a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor; personal data processing is necessary for the achievement of purposes provided by an international treaty of the Russian Federation or by law, for the exercise and performance of functions, powers and obligations imposed on the Operator by the legislation of the Russian Federation.
Types of Personal Data Processing	collection, recording, systematisation, accumulation, storage, updating (modification, amendment), use, retrieval, transfer (provision, access), blocking, deletion, destruction
Methods of Processing	mixed processing with transmission via the internal network of the legal entity

	with transmission via the Internet
Personal Data Processing Period	for the duration of the employment contract between the employee and the Operator and for five years following its termination.
Personal Data Retention Period	in accordance with the retention periods established by the archival legislation of the Russian Federation.

Purpose No. 2	Ensuring compliance with the labour legislation of the Russian Federation
Categories of Personal Data Subjects	Employees Former employees
Categories of Personal Data	1) General personal data: surname, name, patronymic; year of birth; month of birth; date of birth; place of birth; income; residential address; registered address; telephone number; Insurance Number of an Individual Personal Account (SNILS); Taxpayer Identification Number (INN); citizenship; identity document details; bank card details; profession; position; employment history (including length of service and current employment details specifying the name of the organisation and its settlement account); military service status; military registration data; education details. 2) Biometric personal data (data characterising physiological and biological features of a person on the basis of which his or her identity can be established): not processed. 3) Special categories of personal data: not processed.
Legal Grounds for Personal Data Processing	Personal data is processed with the consent of the personal data subject; personal data processing is necessary for the performance of a contract to which the personal data subject is a party, beneficiary or guarantor, as well as for the conclusion of a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor; personal data processing is necessary for the achievement of purposes provided by an international treaty of the Russian Federation or by law, for the exercise and performance of functions, powers and obligations imposed on the Operator by the legislation of the Russian Federation.
Types of Personal Data Processing	collection, recording, systematisation, accumulation, storage, updating (modification, amendment), use, retrieval, transfer (provision, access), blocking, deletion, destruction.
Methods of Processing	mixed processing with transmission via the internal network of the legal entity with transmission via the Internet
Personal Data Processing Period	for the duration of the employment contract between the employee and the Operator and for five years following its termination.
Personal Data Retention Period	in accordance with the retention periods established by the archival legislation of the Russian Federation.

Purpose No. 3	Ensuring compliance with the tax legislation of the Russian Federation
Categories of Personal Data Subjects	Employees

whose personal data is processed	Former employees
Categories of Personal Data	<p>1) General personal data: surname, name, patronymic; year of birth; month of birth; date of birth; place of birth; income; residential address; registered address; telephone number; Insurance Number of an Individual Personal Account (SNILS); Taxpayer Identification Number (INN); citizenship; identity document details; bank card details; profession; position; employment history (including length of service and current employment details specifying the name of the organisation and its settlement account); military service status; military registration data; education details.</p> <p>2) Biometric personal data (data characterising physiological and biological features of a person on the basis of which his or her identity can be established): not processed.</p> <p>3) Special categories of personal data: not processed.</p>
Legal Grounds for Personal Data Processing	<p>Personal data is processed with the consent of the personal data subject; personal data processing is necessary for the performance of a contract to which the personal data subject is a party, beneficiary or guarantor, as well as for the conclusion of a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor;</p> <p>personal data processing is necessary for the achievement of purposes provided by an international treaty of the Russian Federation or by law, for the exercise and performance of functions, powers and obligations imposed on the Operator by the legislation of the Russian Federation.</p>
Types of Personal Data Processing	collection, recording, systematisation, accumulation, storage, updating (modification, amendment), use, retrieval, transfer (provision, access), blocking, deletion, destruction
Methods of Processing	<p>mixed processing</p> <p>with transmission via the internal network of the legal entity</p> <p>with transmission via the Internet</p>
Personal Data Processing Period	for the duration of the employment contract between the employee and the Operator and for five years following its termination.
Personal Data Retention Period	in accordance with the retention periods established by the archival legislation of the Russian Federation.

Purpose No. 4	Ensuring compliance with the pension legislation of the Russian Federation
Categories of Personal Data Subjects	<p>Employees</p> <p>Former employees</p>
Categories of Personal Data	<p>1) General personal data: surname, name, patronymic; year of birth; month of birth; date of birth; place of birth; income; residential address; registered address; telephone number; Insurance Number of an Individual Personal Account (SNILS); Taxpayer Identification Number (INN); citizenship; identity document details; bank card details; profession; position; employment history (including length of service and current employment details specifying</p>

	<p>the name of the organisation and its settlement account); military service status; military registration data; education details.</p> <p>2) Biometric personal data (data characterising physiological and biological features of a person on the basis of which his or her identity can be established): not processed.</p> <p>3) Special categories of personal data: not processed.</p>
Legal Grounds for Personal Data Processing	<p>Personal data is processed with the consent of the personal data subject; personal data processing is necessary for the performance of a contract to which the personal data subject is a party, beneficiary or guarantor, as well as for the conclusion of a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor;</p> <p>personal data processing is necessary for the achievement of purposes provided by an international treaty of the Russian Federation or by law, for the exercise and performance of functions, powers and obligations imposed on the Operator by the legislation of the Russian Federation.</p>
Types of Personal Data Processing	collection, recording, systematisation, accumulation, storage, updating (modification, amendment), use, retrieval, transfer (provision, access), blocking, deletion, destruction
Methods of Processing	<p>mixed processing</p> <p>with transmission via the internal network of the legal entity</p> <p>with transmission via the Internet</p>
Personal Data Processing Period	for the duration of the employment contract between the employee and the Operator and for five years following its termination.
Personal Data Retention Period	in accordance with the retention periods established by the archival legislation of the Russian Federation.

Purpose No. 5	Ensuring compliance with the insurance legislation of the Russian Federation
Categories of Personal Data Subjects	<p>Employees</p> <p>Former employees</p>
Categories of Personal Data	<p>1) General personal data: surname, name, patronymic; year of birth; month of birth; date of birth; place of birth; income; residential address; registered address; telephone number; Insurance Number of an Individual Personal Account (SNILS); Taxpayer Identification Number (INN); citizenship; identity document details; bank card details; profession; position; employment history (including length of service and current employment details specifying the name of the organisation and its settlement account); military service status; military registration data; education details.</p> <p>2) Biometric personal data (data characterising physiological and biological features of a person on the basis of which his or her identity can be established): not processed.</p> <p>3) Special categories of personal data: not processed.</p>
Legal Grounds for Personal Data Processing	<p>Personal data is processed with the consent of the personal data subject;</p> <p>personal data processing is necessary for the performance of a contract</p>

	to which the personal data subject is a party, beneficiary or guarantor, as well as for the conclusion of a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor. personal data processing is necessary for the achievement of purposes provided by an international treaty of the Russian Federation or by law, for the exercise and performance of functions, powers and obligations imposed on the Operator by the legislation of the Russian Federation.
Types of Personal Data Processing	collection, recording, systematisation, accumulation, storage, updating (modification, amendment), use, retrieval, transfer (provision, access), blocking, deletion, destruction
Methods of Processing	mixed processing with transmission via the internal network of the legal entity with transmission via the Internet
Personal Data Processing Period	for the duration of the employment contract between the employee and the Operator and for five years following its termination.
Personal Data Retention Period	in accordance with the retention periods established by the archival legislation of the Russian Federation.

Purpose No. 6	Preparation, conclusion and performance of a civil law contract
Categories of Personal Data Subjects	Clients Contractors Representatives of contractors
Categories of Personal Data	1) General personal data: surname, name, patronymic; year of birth; month of birth; date of birth; email address; residential address; registered address; telephone number; Insurance Number of an Individual Personal Account (SNILS); Taxpayer Identification Number (INN); identity document details; profession; position; messenger account. 2) Biometric personal data (data characterising physiological and biological features of a person on the basis of which his or her identity can be established): not processed. 3) Special categories of personal data: not processed.
Legal Grounds for Personal Data Processing	Personal data is processed with the consent of the personal data subject; personal data processing is necessary for the performance of a contract to which the personal data subject is a party, beneficiary or guarantor, as well as for the conclusion of a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor;
Types of Personal Data Processing	collection, recording, systematisation, accumulation, storage, updating (modification, amendment), use, retrieval, transfer (provision, access), blocking, deletion, destruction.
Methods of Processing	mixed processing with transmission via the internal network of the legal entity with transmission via the Internet
Personal Data Processing Period	for the duration of preparation, conclusion and performance of the civil law contract and for five years following its termination

	of such contract.
Personal Data Retention Period	for the duration of preparation, conclusion and performance of the civil law contract and for five years following its termination.

Purpose No. 7	Promotion of goods, works and services in the market
Categories of Personal Data Subjects	Website visitors Clients Contractors Representatives of contractors
Categories of Personal Data	1) General personal data: surname, name, patronymic; email address; telephone number; profession; position; messenger account. 2) Biometric personal data (data characterising physiological and biological features of a person on the basis of which his or her identity can be established): not processed. 3) Special categories of personal data: not processed.
Legal Grounds for Personal Data Processing	Personal data is processed with the consent of the personal data subject; personal data processing is necessary for the performance of a contract to which the personal data subject is a party, beneficiary or guarantor, as well as for the conclusion of a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor;
Types of Personal Data Processing	collection, recording, systematisation, accumulation, storage, updating (modification, amendment), use, retrieval, transfer (provision, access), blocking, deletion, destruction.
Methods of Processing	mixed processing with transmission via the internal network of the legal entity with transmission via the Internet
Personal Data Processing Period	from the moment of receipt of personal data and the personal data subject's consent to their processing until the purpose of processing is achieved or such consent is withdrawn
Personal Data Retention Period	from the moment of receipt of personal data and the personal data subject's consent to their processing until the purpose of processing is achieved or such consent is withdrawn

Purpose No. 8	Informing an indefinite group of persons about the Operator's activities and its employees
Categories of Personal Data Subjects	Employees
Categories of Personal Data	1) General personal data: surname, name, patronymic; employment details (including length of service and current employment information); profession; position; photo/video image. 2) Biometric personal data (data characterising physiological and

	biological features of a person on the basis of which his or her identity can be established): not processed. Special categories of personal data: not processed.
Legal Grounds for Personal Data Processing	Personal data shall be processed with the consent of the personal data subject.
Types of Personal Data Processing	collection, recording, systematisation, accumulation, storage, updating (modification, amendment), use, retrieval, transfer (provision, access), blocking, deletion, destruction, dissemination.
Methods of Processing	mixed processing with transmission via the internal network of the legal entity with transmission via the Internet
Personal Data Processing Period	from the moment of receipt of personal data and the personal data subject's consent to their processing until the purpose of processing is achieved or such consent is withdrawn
Personal Data Retention Period	from the moment of receipt of personal data and the personal data subject's consent to their processing until the purpose of processing is achieved or such consent is withdrawn

## **8. updating, rectification, deletion and destruction of personal data, and responses to data subjects' requests for access to personal data**

8.1. The personal data subject shall have the right to obtain information relating to the processing of his or her personal data, including:

- 1) confirmation of the fact of personal data processing by the Operator;
- 2) the legal grounds for and purposes of personal data processing;
- 3) the purposes of processing and the methods used by the Operator for processing personal data;
- 4) the name and location of the Operator, and information about persons (other than employees of the Operator) who have access to personal data or to whom personal data may be disclosed on the basis of a contract with the Operator or in accordance with federal law;
- 5) the personal data relating to the relevant personal data subject that is being processed, the source of such data, unless another procedure for providing such data is established by federal law;
- 6) the periods of personal data processing, including retention periods;
- 7) the procedure for exercising the rights of the personal data subject as provided for by the Personal Data Law;
- 8) information on any completed or contemplated cross-border transfer of personal data;
- 9) the name or full name and address of the person processing personal data on behalf of the Operator, where such processing has been or will be entrusted to such person;
- 10) other information provided for by the Personal Data Law or other federal laws.

8.2. The above information shall be provided by the Operator to the personal data subject in an accessible form and shall not include personal data relating to other personal data subjects, except where there are lawful grounds for disclosure of such data.

8.3. The information specified in Clause 8.1 shall be provided by the Operator to the personal data subject or his or her representative upon request or upon receipt of a request from the personal data subject or his or her representative.

8.4. The request shall contain:

- the number of the principal identity document of the personal data subject or his or her representative, information on the date of issue of such document and the issuing authority;
- information confirming the personal data subject's relationship with the Operator (contract number, date of conclusion of the contract, code word designation and/or other information), or other information confirming the fact that the Operator processes personal data;
- the signature of the personal data subject or his or her representative.

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

8.5. Where the information specified in Clause 8.1, as well as the processed personal data, has been provided to the personal data subject for review upon request, the personal data subject shall have the right to apply again to the Operator or to submit a repeated request in order to obtain the information specified in Clause 8.1 and to review such personal data no earlier than 30 days after the initial application or submission of the initial request, unless a shorter period is established by federal law, a regulatory legal act adopted in accordance therewith, or a contract to which the personal data subject is a party, beneficiary or guarantor.

8.6. The personal data subject shall have the right to apply again to the Operator or to submit a repeated request in order to obtain the information specified in Clause 8.1, as well as to review the processed personal data, prior to the expiry of the period specified in Clause 8.5, where such information and/or personal data was not provided in full for review following consideration of the initial request. A repeated request, in addition to the information specified in Clause 8.1, shall include a justification for submitting such repeated request.

8.7. The Operator shall have the right to refuse to comply with a repeated request that does not meet the requirements set out in Clauses 8.5 and 8.6. Such refusal shall be reasoned. The burden of proving the lawfulness of such refusal shall rest with the Operator.

8.8. The Operator shall inform the personal data subject or his or her representative of the existence of personal data relating to such personal data subject and shall provide access to such personal data upon application by the personal data subject or his or her representative, or within 30 days from the date of receipt of the relevant request.

8.9. The Operator shall provide the personal data subject or his or her representative, free of charge, with access to personal data relating to such personal data subject.

8.10. Within a period not exceeding seven working days from the date on which the personal data subject or his or her representative provides information confirming that the personal data is incomplete, inaccurate or outdated, the Operator shall make the necessary amendments.

8.11. Within a period not exceeding seven working days from the date on which the personal data subject or his or her representative provides information confirming that such personal data has been unlawfully obtained or is not necessary for the stated purpose of processing, the Operator shall destroy such personal data.

8.12. The Operator shall notify the personal data subject or his or her representative of the amendments made, and the measures taken and shall take reasonable steps to notify third parties to whom such personal data has been disclosed.

8.13. Where unlawful processing of personal data is identified upon application by the personal data subject or his or her representative, or upon request of the personal data subject, his or her representative, or the competent authority for the protection of the rights of personal data subjects, the Operator shall block the unlawfully processed personal data relating to such personal data subject,

or ensure such blocking (where processing is carried out by another person acting on behalf of the Operator), from the moment of such application or receipt of such request for the duration of the verification.

8.14. Where inaccurate personal data is identified upon application by the personal data subject or his or her representative, or upon their request, or upon request of the competent authority for the protection of the rights of personal data subjects, the Operator shall block such personal data relating to the personal data subject, or ensure such blocking (where processing is carried out by another person acting on behalf of the Operator), from the moment of such application or receipt of such request for the duration of the verification, provided that such blocking does not infringe the rights and legitimate interests of the personal data subject or third parties.

8.15. Where the inaccuracy of personal data is confirmed, the Operator shall, on the basis of information provided by the personal data subject, his or her representative, or the competent authority for the protection of the rights of personal data subjects, or other necessary documents, update such personal data or ensure such updating (where processing is carried out by another person acting on behalf of the Operator) within seven working days from the date of submission of such information and shall lift the blocking of such personal data.

8.16. Where unlawful processing of personal data carried out by the Operator or by a person acting on behalf of the Operator is identified, the Operator shall, within a period not exceeding three working days from the date of such identification, cease such unlawful processing or ensure that such processing is ceased. Where it is impossible to ensure the lawfulness of personal data processing, the Operator shall, within a period not exceeding ten working days from the date of identification of such unlawful processing, destroy such personal data or ensure its destruction. The Operator shall notify the personal data subject or his or her representative of the elimination of the violations or the destruction of personal data, and, where the application or request was submitted by the competent authority for the protection of the rights of personal data subjects, shall also notify such authority.

8.17. Upon achievement of the purpose of personal data processing, the Operator shall cease processing of personal data or ensure such cessation (where processing is carried out by another person acting on behalf of the Operator), and shall destroy such personal data or ensure its destruction (where processing is carried out by another person acting on behalf of the Operator) within a period not exceeding 30 days from the date of achievement of the purpose, unless otherwise provided by a contract to which the personal data subject is a party, beneficiary or guarantor, another agreement between the Operator and the personal data subject, or where the Operator is entitled to process personal data without consent on the grounds provided for by the Personal Data Law or other federal laws.

8.18. Where the personal data subject withdraws consent to the processing of personal data, the Operator shall cease such processing or ensure its cessation (where processing is carried out by another person acting on behalf of the Operator), and, where retention of personal data is no longer required for the purposes of processing, shall destroy such personal data or ensure its destruction (where processing is carried out by another person acting on behalf of the Operator) within a period not exceeding 30 days from the date of receipt of such withdrawal, unless otherwise provided by a contract to which the personal data subject

is a party, beneficiary or guarantor, another agreement between the Operator and the personal data subject, or where the Operator is entitled to process personal data without consent on the grounds provided for by the Personal Data Law or other federal laws.

8.19. Where it is not possible to destroy personal data within the specified time limits, the Operator shall block such personal data or ensure such blocking (where processing is carried out by another person acting on behalf of the Operator) and shall ensure the destruction of such personal data within a period not exceeding six months, unless another period is established by federal law.

8.20. External access to personal data shall be granted only upon receipt of a request from the person seeking such access, specifying the scope of the required information and the purposes for which it will be used, and subject to the written consent of the personal data subject whose data is requested. When transferring personal data to third parties, including representatives of employees and other categories of personal data subjects, the information transferred shall be limited strictly to the personal data necessary for such third parties to perform their functions.

## **9. Measures to Ensure the Security of Personal Data During Processing**

9.1. When processing personal data, the Operator shall take the necessary legal, organisational and technical measures, or ensure that such measures are taken, to protect personal data against unauthorised or accidental access, destruction, alteration, blocking, copying, provision, dissemination, as well as against any other unlawful actions in relation to personal data.

9.2. The Operator shall implement the following measures necessary and sufficient to ensure compliance with the obligations imposed on the Operator by the Personal Data Law and the regulatory legal acts adopted pursuant thereto:

9.2.1. appointment of a person responsible for organising personal data processing;

9.2.2. approval of documents defining the Operator's policy with respect to personal data processing (including the Regulation on Personal Data Processing, orders appointing the person responsible for personal data processing and approving the Personal Data Processing Policy, and orders granting access to personal data), as well as internal policies governing personal data processing, which define, for each purpose of processing, the categories and scope of personal data processed, categories of personal data subjects, methods, time limits for processing and storage, procedures for destruction of personal data upon achievement of processing purposes or upon occurrence of other lawful grounds, and internal procedures aimed at preventing and detecting violations of the legislation of the Russian Federation and eliminating the consequences of such violations;

9.2.3. familiarisation of the Operator's employees directly engaged in personal data processing with the provisions of the legislation of the Russian Federation on personal data, including personal data protection requirements, documents defining the Operator's policy on personal data processing, internal policies on personal data processing, including relevant regulations and instructions, and training of such employees;

9.2.4. publication of this Policy, or otherwise ensuring unrestricted access to it and to information on the implemented personal data protection measures;

9.2.5. implementation of internal control and/or audit of compliance of personal data processing with the Personal Data Law, the regulatory legal acts adopted pursuant thereto, personal data protection requirements, this Policy and the Operator's internal policies;

9.2.6. assessment of potential harm that may be caused to personal data subjects in the event of a breach of the Personal Data Law, in accordance with the requirements established by the competent authority for the protection of the rights of personal

data subjects, and assessment of the proportionality between such harm and the measures taken by the Operator to ensure compliance with its statutory obligations;

9.3. Personal data security during processing by the Operator shall, inter alia, be ensured through:

9.3.1. identification of security threats to personal data during their processing within personal data information systems;

9.3.2. implementation of organisational and technical measures to ensure personal data security during their processing within personal data information systems, necessary to comply with personal data protection requirements, the fulfilment of which ensures the levels of protection established by the Government of the Russian Federation.

9.3.3. by using information security tools that have undergone conformity assessment in accordance with applicable regulatory requirements;

9.3.4. by using information security tools that have undergone conformity assessment in accordance with applicable regulatory requirements and that incorporate a data destruction function for the destruction of personal data;

9.3.5. by assessing the effectiveness of the measures taken to ensure personal data security prior to commissioning the personal data information system;

9.3.6. by maintaining records of machine-readable media containing personal data;

9.3.7. a system is implemented to detect unauthorised access to personal data and to take measures for the detection, prevention and mitigation of the consequences of computer attacks on personal data information systems, as well as for responding to computer incidents therein;

9.3.8. by restoring personal data modified or destroyed as a result of unauthorised access;

9.3.9. by establishing rules for access to personal data processed in personal data information systems, and by ensuring logging and accounting of all actions performed with personal data within such systems;

9.3.10. by monitoring the measures taken to ensure personal data security and the level of protection of personal data information systems.

9.4. Personal data security during processing within an information system shall be ensured by the Operator through the following measures:

9.4.1. implementation of security controls for premises housing the personal data information system to prevent unauthorised or uncontrolled access to, or presence within, such premises by unauthorised persons.

9.4.2. ensuring the integrity and safekeeping of personal data media.

9.4.3. approval by the head of the Operator of a document defining the list of persons whose access to personal data processed within the information system is necessary for the performance of their official (employment) duties;

9.4.4. use of information security tools that have undergone conformity assessment in accordance with the legislation of the Russian Federation in the field of information security, where such tools are necessary to mitigate relevant threats;

9.4.5. segregation of access rights to physical media containing personal data;

9.4.6. establishment of access rules for personal data processed within personal data information systems.

9.5. The measures that may be taken by the Operator to ensure personal data security, implemented within the personal data protection system taking into account actual threats and applied information technologies, include:

- identification and authentication of access subjects and access objects;
- access control of subjects to access objects;
- security event logging;
- anti-virus protection;

- monitoring (analysis) of personal data security;
- protection of virtualisation environments;
- protection of technical means;
- protection of the information system, its components, communication systems and data transmission systems.

9.6. To ensure the security of personal data during non-automated processing, the following measures shall be taken:

9.6.1. storage locations for personal data shall be designated and equipped with protective means:

- the Operator ensures separate storage of personal data (physical media) processed for different purposes;
- offices where documents containing personal data are stored are equipped with safes, cabinets, shelving units and storage units;
- such offices are additionally equipped with locks and security and fire alarm systems;

9.6.1. security arrangements are implemented for premises designated for storage of physical media containing personal data;

9.7. personal computers having access to personal data storage databases are protected by passwords; passwords are set by the Operator and assigned individually to each employee authorised to process personal data on the relevant computer.

## **10. Final Provisions**

10.1. This Policy shall enter into force upon its approval by the head of the Operator and shall remain in force until replaced by a new policy.

10.2. The provisions of this Policy may be further specified and supplemented by other internal regulatory documents of the Operator.

10.3. In the event of amendments to applicable legislation, other regulatory acts, or the Operator's Articles of Association, this Policy may be amended accordingly. Until such amendments are made, the Policy shall apply to the extent that it does not contradict applicable legislation or the Operator's Articles of Association.

10.4. Responsibility for introducing amendments to this Policy shall rest with the person responsible for personal data processing within the Operator.

## **11. Details**

DSM Group Joint Stock Company

125124, Russian Federation, Moscow Begovoy Municipal District, 8 Pravdy Street, Building 7

INN (Taxpayer Identification Number): 7707591431

KPP (Tax Registration Reason Code): 771401001

OGRN (Primary State Registration Number): 1067746709733