



## **Abrasive Technologies LLC Privacy Policy**

### **1. General Provisions**

1.1. This Abrasive Technologies Limited Liability Company Policy regarding the processing of personal data (hereinafter referred to as the Policy) has been developed in compliance with the requirements of Clause 2, Part 1, Article 18.1 of Federal Law No. 152-FZ "On Personal Data" of July 27, 2006 (hereinafter referred to as the Personal Data Law) in order to ensure the protection of the rights and freedoms of individuals and citizens when processing their personal data, including the protection of their rights to privacy, personal and family secrets.

1.2. This Policy applies to all personal data processed by Abrasive Technologies Limited Liability Company (hereinafter referred to as the Operator, Abrasive Technologies LLC).

1.3. This Policy applies to personal data processing relationships between the Operator and the Operator that arose both before and after the approval of this Policy.

1.4. Pursuant to the requirements of Part 2 of Article 18.1 of the Law on Personal Data, this Policy is published in the public domain on the Operator's website.

1.5. Key concepts used in the Policy:

personal data - any information relating to a directly or indirectly identified or determinable individual (personal data subject);

personal data operator (operator) - a government agency, municipal agency, legal entity, or individual that, independently or jointly with other persons, organizes and/or carries out the processing of personal data, and determines the purposes of processing personal data, the composition of personal data subject to processing, and the actions (operations) performed with personal data;

personal data processing - any action (operation) or set of actions (operations) with personal data, performed with or without the use of automation tools. Personal data processing includes, but is not limited to:

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

Automated processing of personal data - the processing of personal data using computer technology;

Dissemination of personal data - actions aimed at disclosing personal data to an indefinite number of persons;

Provision of personal data - actions aimed at disclosing personal data to a specific person or a specific number of persons;

Blocking of personal data - temporary cessation of 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 contents of personal data in a personal data information system and/or that result in the destruction of tangible media containing personal data;

Depersonalization of personal data - actions that make it impossible to determine the ownership of personal data by a specific data subject without the use of additional information;

Personal data information system - a set of personal data contained in databases and the information technologies and technical means that support their processing.

## 1.6. Basic Rights and Obligations of the Operator.

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

- 1) independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Personal Data Law and regulatory legal acts adopted in accordance therewith, unless otherwise provided by the Personal Data Law or other federal laws;
- 2) entrust the processing of personal data to another person with the consent of the personal data subject, unless otherwise provided by federal law, on the basis of an agreement concluded with such person. Any person processing personal data on behalf of the Operator is obligated to comply with the principles and rules for processing personal data stipulated by the Personal Data Law, maintain the confidentiality of personal data, and take the necessary measures to ensure the fulfillment of obligations stipulated by the Personal Data Law;
- 3) If the personal data subject revokes their consent to the processing of personal data, the Operator has the right to continue processing the personal data without the consent of the personal data subject, provided there are grounds specified in the Personal Data Law.

### 1.6.2. The Operator is obligated to:

- 1) organize the processing of personal data in accordance with the requirements of the Personal Data Law;
- 2) respond to inquiries and requests from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law.
- 3) Notify 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)) of the necessary information upon request within 10 business days of receipt of such request. This period may be extended, but not more than by five business days. To do so, the Operator must send Roskomnadzor a reasoned notice stating the reasons for the extension of the deadline for providing the requested information;
- 4) In the manner determined by the federal executive body authorized to ensure security, ensure interaction with the state system for detecting, preventing, and eliminating the consequences of computer attacks on information resources of the Russian Federation, including informing it of computer incidents that resulted in the unauthorized transfer (provision, distribution, or access) of personal data.

## 1.7. Fundamental Rights of the Personal Data Subject. The personal data subject has the right to:

- 1) Receive information regarding the processing of their personal data, except in cases stipulated by federal laws. The Operator provides the personal data subject with information in an accessible form and must not contain personal data related to other personal data subjects, except in cases where there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Law on Personal Data;
- 2) request the Operator to clarify their personal data, block it, or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained, or is not necessary for the stated purpose of processing, and also take measures provided by law to protect their rights;



- 3) provide prior consent to the processing of personal data for the purpose of promoting goods, works, and services;
- 4) appeal to Roskomnadzor or in court against the Operator's illegal actions or inaction in the processing of their personal data;
- 5) Revoke consent to the processing of personal data.

To exercise this right, the personal data subject may send a written request to the Operator, specifying information about the identity document or representative (type of document, series and number, by whom and when issued), the full name of the representative, information about the nature of the relationship with the Operator that will confirm the processing of the personal data of the personal data subject, and the signature of the personal data subject's representative. The request may be sent to the following address: Russia, 188540, Leningrad Region, Sosnovy Bor, Mira Street 1.

1.8. Compliance with the requirements of this Policy is monitored by the 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 regulations of Abrasive Technologies LLC in the field of processing and protecting personal data is determined in accordance with the legislation of the Russian Federation.

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

2.1. The processing of personal data is limited to the achievement of specific, predetermined, and legitimate purposes. Processing of personal data incompatible with the purposes for which it was collected is prohibited.

2.2. Only personal data that is relevant to the purposes for which it is processed may be processed.

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

- carrying out its activities in accordance with the charter of Abrasive Technologies LLC, including concluding and executing contracts with counterparties;
- enforcing labor laws in the context of labor and other directly related relationships, including: assisting employees in finding employment, obtaining education, and advancing their careers, recruiting and selecting candidates for employment with the Operator, ensuring the personal safety of employees, monitoring the quantity and quality of work performed, ensuring the safety of property, maintaining personnel and accounting records, completing and submitting required reporting forms to authorized bodies, and organizing the individual (personalized) registration of employees in the mandatory pension insurance and mandatory social insurance systems;
- implementing access control.
- collecting information about orders for the Operator's products, collecting information about product quality complaints, receiving customer feedback on products or interactions with the Operator, maintaining a history of requests to the Operator, and conducting marketing research in the area of sales; for advertising, research, information, and other purposes, including through direct contact via various means of communication.

To achieve this purpose, the following personal data, which is not special or biometric, is processed:

- Full name;
- Email address;
- Phone number;
- Company name.

The legal basis for processing personal data is: Article 24 of the Constitution of the Russian Federation; Articles 6 and 11 of Federal Law No. 152-FZ "On Personal Data." This data is stored and processed for the entire duration of the Consent to the Processing of Personal Data and is destroyed within 30 days of the revocation of the Consent to the Processing of Personal Data by deleting it from information systems.

- analysis of the interest level and preferences of visitors to the Operator's websites

Cookies are small files downloaded to any device of a Website visitor (e.g., a computer, smartphone, or tablet) when they visit a specific Website. Cookies are widely used to ensure the operation of Websites and improve their efficiency. At any time, the user can change the settings in their browser so that the browser stops saving all cookies and notifies them when they are sent. In this case, some services and functions of the Website may stop working or work incorrectly. The Operator's cookie policy is published on the



Operator's website. The website may use visitor statistics services (Yandex.Metrica), which collect and analyze anonymized information to determine the level of interest of website visitors.

2.4. The processing of employees' personal data may be carried out solely for the purpose of ensuring compliance with laws and other regulations.

### **3. Legal Basis for Processing Personal Data**

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

- The Constitution of the Russian Federation;
- The Civil Code of the Russian Federation;
- The Labor Code of the Russian Federation;
- The Tax Code of the Russian Federation;
- Federal Law No. 14-FZ of 08.02.1998 "On Limited Liability Companies";
- Federal Law No. 402-FZ of 06.12.2011 "On Accounting";
- Federal Law No. 167-FZ of 15.12.2001 "On Compulsory Pension Insurance in the Russian Federation";
- Other regulatory legal acts governing relations related to the Operator's activities.

3.2. The legal basis for processing personal data also includes:

- the charter of Abrasive Technologies LLC;
- agreements concluded between the Operator and personal data subjects;
- consent of personal data subjects to the processing of their personal data.
- consent of personal data subjects to the processing of cookies under the terms of the Cookie Policy.

### **4. Volume and categories of personal data processed, categories of personal data subjects**

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

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

4.2.1. Candidates for employment with the Operator - for the purposes of enforcing labor legislation within the framework of employment and other directly related relationships, and implementing access control: In the HR department, candidates complete a questionnaire consisting of the following information:

- last name, first name, patronymic;
- gender;
- citizenship;
- date and place of birth;
- contact information;
- information about education, work experience, and qualifications;
- other personal data provided by candidates in their resumes and cover letters.

4.2.2. Employees and former employees of the Operator - for the purposes of enforcing labor legislation in the context of employment and other directly related relationships, and implementing access control:

- last name, first name, patronymic;
- gender;



- citizenship;
- date and place of birth;
- image (photograph);
- passport details;
- registered address of residence;
- actual address of residence;
- contact details;
- individual taxpayer identification number;
- individual personal insurance number (SNILS);
- information on education, qualifications, professional training, and advanced training;
- marital status, presence of children, family ties;
- employment history, including any incentives, awards, and/or disciplinary sanctions;
- marriage registration details;
- military registration details;
- disability details;
- information on alimony deductions;
- information on income from a previous place of employment;
- other personal data provided by employees in accordance with labor legislation.

4.2.3. Family members of the Operator's employees - for the purposes of enforcing labor legislation in the context of employment and other directly related relationships:

- last name, first name, patronymic;
- degree of kinship;
- year of birth;
- other personal data provided by employees in accordance with labor legislation.

4.2.4. Clients and contractors of the Operator (individuals) - for the purposes of carrying out their activities in accordance with the charter of Abrasive Technologies LLC and implementing access control:

- last name, first name, patronymic;
- date and place of birth;
- passport details;
- registered address of residence;
- contact details;
- job title;
- individual taxpayer identification number;
- bank account number;
- other personal data provided by clients and counterparties (individuals) necessary for the conclusion and execution of contracts.

4.2.5. Representatives (employees) of the Operator's clients and counterparties (legal entities) - for the purposes of carrying out their activities in accordance with the charter of Abrasive Technologies LLC and implementing access control:

- last name, first name, patronymic;
- passport details;
- contact details;
- job title;
- other personal data provided by representatives (employees) of clients and counterparties necessary for the conclusion and execution of contracts.



4.2.6. Visitors to the Operator's websites (individuals) - for the purposes of providing information about the Operator, goods sold, services rendered, current promotions and special offers, and analyzing the level of interest:

- full name;
- email address;
- phone number;
- company name;
- cookies.

4.3. The Operator processes biometric personal data (information that characterizes a person's physiological and biological characteristics, based on which their identity can be established) in accordance with Russian Federation law.

4.4. The Operator does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, health status, or intimate life, except in cases stipulated by Russian Federation law.

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

5.1. The Operator processes personal data in accordance with the requirements of Russian legislation.

5.2. Personal data is processed with the consent of personal data subjects to the processing of their personal data, and without such consent in cases stipulated by Russian legislation.

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

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

5.4. Only the Operator's employees whose job responsibilities include processing personal data are allowed to process personal data.

5.5. Personal data is processed for each processing purpose specified in Section 2.3 of the Policy by:

- obtaining personal data orally and in writing directly from personal data subjects;
- 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 distribution of personal data without the consent of the personal data subject is prohibited, unless otherwise provided by federal law. Consent to the processing of personal data permitted for distribution by the personal data subject is issued separately from other consents of the personal data subject to the processing of their personal data.

Requirements for the content of consent to the processing of personal data permitted for distribution by the personal data subject are approved by Order of Roskomnadzor dated February 24, 2021, No. 18.

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

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

- Identifying threats to the security of personal data during its processing;
- Adopts local regulations and other documents governing relations in the field of processing and protecting personal data;
- Appoints persons responsible for ensuring the security of personal data in the Operator's structural divisions and information systems;
- Creates the necessary conditions for working with personal data;
- Organizes the recording of documents containing personal data;
- Organizes work with information systems in which personal data is processed;





- Stores personal data in conditions that ensure its security and prevent unauthorized access;
- Organizes training for the Operator's employees processing personal data.

5.9. The Operator stores personal data in a form that allows for the identification of the personal data subject for no longer than required for each purpose of processing the personal data, unless the storage period for personal data is established by federal law or an agreement.

5.9.1. Personal data on paper media is stored at Abrasive Technologies LLC for the document retention periods specified by Russian Federation archival legislation (Federal Law No. 125-FZ of October 22, 2004, "On Archival Affairs in the Russian Federation" and the List of Standard Management Archival Documents Generated in the Course of Activities of State Bodies, Local Governments, and Organizations, with Indication of Their Retention Periods (approved by Order of the Federal Archival Agency No. 236 of December 20, 2019)).

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

5.10. The operator will stop processing personal data in the following cases:

- unlawful processing is detected. The deadline is three business days from the date of detection;
- the purpose of processing is achieved;
- the consent of the personal data subject to the processing of the said data has expired or has been revoked, when, according to the Personal Data Law, the processing of such data is permitted only with consent.

5.11. Upon achieving the purposes of personal data processing, or in the event that the personal data subject revokes consent to its processing, the Operator shall cease processing such data unless:

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

5.12. If the personal data subject requests the Operator to cease processing personal data within a period not exceeding 10 business days from the date the Operator receives the corresponding request, the processing of the personal data will cease, except in cases stipulated by the Personal Data Law. This period may be extended, but by no more than five business days. To this end, the Operator must send the personal data subject a reasoned notice stating the reasons for the extension.

5.13. When collecting personal data, including via the Internet, the recording, systematization, accumulation, storage, clarification (updating, modification), or extraction of personal data of Russian citizens using databases located outside the Russian Federation is prohibited, with the exception of cases specified in the Law on Personal Data.

## **6. Updating, Correcting, Deleting, and Destroying Personal Data; Responses to Subjects' Requests for Access to Personal Data**

6.1. Confirmation of the personal data processing by the Operator, the legal grounds and purposes for which the personal data is processed, as well as other information specified in Part 7 of Article 14 of the Law on Personal Data, shall be provided by the Operator to the personal data subject or their representative within 10 business days of the request or receipt of the personal data subject's or their representative's request. This period may be extended, but by no more than five business days. To this end, the Operator shall send the personal data subject a reasoned notice stating the reasons for extending the deadline for providing the requested information.

The information provided shall not include personal data related to other personal data subjects, except in cases where there are legal grounds for disclosing such personal data.

The request must contain:

- the number of the primary identity document of the personal data subject or their representative, the date of issue of said document, and the issuing authority;
- information confirming the personal data subject's participation in the relationship with the Operator (contract number, contract date, code word, and/or other information), or information otherwise confirming the processing of personal data 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 on Personal Data to the personal data subject or their representative in the form in which the relevant request or inquiry was sent, unless otherwise specified in the request or inquiry.

If the request or inquiry of the personal data subject does not contain all the necessary information in accordance with the requirements of the Law on Personal Data, or the subject does not have the right to access the requested information, a reasoned refusal will be sent to them.

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

6.2. If inaccurate personal data is discovered upon an application by a data subject or their representative, or at their request, or at the request of Roskomnadzor, the Operator will block the personal data related to that data subject from the moment of such application or receipt of the said request for the duration of the verification, unless blocking the personal data violates the rights and legitimate interests of the data subject or third parties.

If the inaccuracy of personal data is confirmed, the Operator, based on information provided by the data subject or their representative, or Roskomnadzor, or other necessary documents, will clarify the personal data within seven business days from the date of submission of such information and unblock the personal data.

6.3. If unlawful processing of personal data is detected upon request (application) from a personal data subject or their representative, or Roskomnadzor, the Operator will block the unlawfully processed personal data relating to that personal data subject from the moment of such request or receipt of the application.

6.4. If the Operator, Roskomnadzor, or another interested party discovers an 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:

- within 24 hours - notifies Roskomnadzor of the incident, the presumed 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, and also provides information about the person authorized by the Operator to interact with Roskomnadzor on matters 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 processing personal data or the loss of the need to achieve this purpose - within 30 days;
- reaching the maximum retention periods for documents containing personal data - within 30 days;
- provision by the personal data subject (his or her representative) of confirmation that the personal data was obtained illegally or is not necessary for the stated purpose of processing - within seven business days;
- revocation by the personal data subject of consent to the processing of his or her personal data if its preservation for the purpose of processing is no longer required - within 30 days.

6.5.2. Upon achieving the purpose of personal data processing, or if the personal data subject revokes consent to its processing, personal data will be destroyed unless:

- otherwise provided by an agreement to which the personal data subject is a party, beneficiary, or guarantor;
- the Operator may not process personal data without the consent of the personal data subject on the grounds stipulated by the Personal Data Law or other federal laws;
- otherwise provided by another agreement between the Operator and the personal data subject.

6.5.3. The destruction of personal data is carried out by a commission established by order of the General Director of Abrasive Technologies LLC.

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