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Approved by the Board of Directors of PJSC Uralkali
(Minutes 403 dated 04.03.2022)

The Personal Data Processing Policy of PJSC Uralkali

1. General

- 1.1. The personal data processing policy of PJSC Uralkali (hereinafter, the Policy) defines the basic principles, objectives, content, conditions, procedure and methods for processing personal data in accordance with the legislation of the Russian Federation.
- 1.2. The policy was developed in accordance with Federal Law No 152-FZ dated 27 July 2006 “On personal data”, Federal Law No 149-FZ dated 27 July 2006 “On information, information technologies and information protection”, and the Labour Code of the Russian Federation.
- 1.3. The Policy applies to all personal data subjects whose personal data is processed by PJSC Uralkali.
- 1.4. The Policy serves as the basis for the development of internal regulations governing the processing of personal data of employees of PJSC Uralkali and other personal data subjects in PJSC Uralkali.
- 1.5. The purpose of this Policy is to ensure the protection of the rights and freedoms of the subject during processing of personal data.
- 1.6. The Policy uses terms and definitions as they are defined in Federal Law No 152-FZ dated 27 July 2006 “On personal data”.
- 1.7. This Policy shall come into force once approved and until it is superseded with a new edition.

2. Basic rights, responsibilities and liability of subjects of personal data and the operator

- 2.1. In order to ensure the protection of their personal data, the subject of personal data has the right to:
 - receive information about the Company, its location, whether it has personal data relating to the relevant subject of personal data, as well as to review such personal data;
 - request the Company to clarify their personal data, block or destroy it if the personal data is incomplete, outdated, unreliable, illegally obtained or is not necessary for the stated purpose of processing, as well as take legal measures to protect their rights;
 - receive, upon request, information regarding the processing of their personal data;
 - appeal against actions or inaction of the Company to an authorised body for the protection of the rights of subjects of personal data or in court;
 - protect their rights and legitimate interests, including compensation for losses and (or) emotional damages in court.
- 2.2. The Company shall provide the personal data subject or their legal representative, free of charge, with an opportunity to review the personal data relating to the relevant personal data subject, amend, destroy or block it upon the provision by the personal data subject or their legal representative of information confirming that the personal data relating to the relevant subject and processed by the Company is incomplete, outdated, unreliable, illegally obtained or is not necessary for the stated purpose of processing. The Company shall notify the subject of personal data or their legal representative and third parties to whom the personal data of this subject were transferred about the changes made and the measures taken.
- 2.3. If unlawful actions with personal data are discovered, the Company shall eliminate violations within the prescribed period. If it is impossible to eliminate the violations, the Company shall destroy the personal data. The Company shall notify the subject of personal data or their legal representative about the elimination of violations or the destruction of personal data.
- 2.4. If the subject of personal data withdraws their consent to the processing of their personal data, the Company shall stop processing personal data and destroy personal data within a period not exceeding three business days from the receipt of such withdrawal, unless otherwise provided by the legislation of the Russian Federation or an agreement between the Company and the subject of personal data. The Company shall notify the subject of personal data about the destruction of personal data.
- 2.5. The Company shall not transfer processed personal data to third parties without the written consent of the subject of personal data, except as otherwise provided by the legislation of the Russian Federation.

3. Purposes and principles of personal data processing

- 3.1. The Company, as an operator of personal data, processes it for the following purposes:

- Ensure compliance with the Constitution, laws and regulations of the Russian Federation;
- Assist employees in employment, education and career promotion, ensure of personal safety of employees, monitor the quantity and quality of work and ensuring the safety of property;
- Implement social programs, healthcare and hotel services;
- Prepare, enter into, execute and terminate agreements by clients and counterparties of the operator (individuals);
- Control of access at the Company's facilities and provide access to the Company's information systems;
- Protect life, health or other vital interests of personal data subjects;
- Calculate and pay wages;
- Submit statutory employer reporting in respect of individuals, including personalised accounting information to the Pension Fund, information about the income of individuals to the Federal Tax Service, Social Insurance Fund, employment centres, Federal Migration Service, Penitentiary Inspectorate, Bailiff Service, courts, justices of the peace, the prosecutor's office, the police, the Treasury, and regional administrations;
- Provide voluntary medical insurance;
- Provide financial assistance;
- Manage business trips;
- Develop a talent pool;
- Participate in sports events;
- Provide information support;
- For other lawful purposes.

3.2. The principles of personal data processing in the Company are:

- legality of the purposes and methods of processing personal data;
- compliance of the purposes of personal data processing with the purposes determined and declared during the collection of personal data;
- compliance of the volume and nature of the processed personal data, methods of processing personal data with the purposes of processing personal data;
- the accuracy of the personal data being processed, its sufficiency, and, if necessary, relevance in relation to the purposes of processing, prohibition of processing personal data in the Company in excess of the purposes stated when collecting personal data;
- prohibition of consolidation of databases containing personal data, the processing of which is carried out for incompatible purposes;
- implementation of comprehensive organisational and technical measures to protect personal data to avoid access to it by unauthorised persons.

4. Legal grounds for the processing of personal data

The legal grounds for the processing of personal data in the Company are as follows:

- The Constitution of the Russian Federation
- The Civil Code of the Russian Federation,
- The Tax Code of the Russian Federation,
- The Labour Code of the Russian Federation,
- Agreements between the operator and personal data subjects;
- Consents to the processing of personal data;
- Federal Law dated 1 April 1996 No 27-FZ "On individual (personalised) accounting in the system of compulsory pension insurance",
- Other federal laws, standards, external and internal regulations directly related to activities of the Company.

5. Scope and categories of processed personal data, categories of personal data subjects

5.1. The content, categories, volume and list of processed personal data are defined in the Company's internal regulatory documents in accordance with the legislation of the Russian Federation and taking into account the purposes of processing specified in Section 3 of the Policy.

5.2. The Company processes personal data of the following categories of personal data subjects:

- 1) employees of the operator, employees who terminated their employment relationship with the operator, candidates for vacant positions, relatives of employees (as part of a personal record card in Form T.2);

- 2) clients and contractors of the operator (individuals);
- 3) representatives/employees of clients and contractors of the operator (legal entities);
- 4) visitors and visitors of the corporate website;
- 5) employees of subsidiaries;
- 6) other subjects of personal data (to ensure implementation of the goals specified in Section 3 of this Policy).

5.3. Processing of special categories of personal data of subjects relating to their race, nationality, political views, religious or philosophical beliefs and private life is not performed.

6. Procedure and conditions for processing personal data

6.1. The Company processes the personal data including its collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalisation, blocking, deletion and destruction.

6.2. Processing of personal data of employees of the Company and other persons is carried out with the consent of the subject of personal data to the processing of his personal data.

6.3. The processing of personal data of employees of the Company and other persons may be carried out without the consent of the subject of personal data for processing in accordance with Article 6 of Federal Law No 152-FZ "On personal data".

6.4. When making decisions affecting the interests of the subject of personal data, the Company does not have the right to rely on personal data obtained solely as a result of its automated processing or electronic receipt.

6.5. The collection of personal data of subjects is carried out during recruiting (assisting employment), formalising labour and contractual relations, providing access to third-party visitors to the Company's facilities.

6.6. Personal data is provided by the subjects personally. The list of processed personal data and information systems is defined and fixed in accordance with internal regulatory documents of the Company.

6.7. When collecting personal data, the Company's employees who collect (receive) personal data directly from the persons specified in Item 6.2 of this Policy explain the legal consequences of refusing to provide personal data if the provision of personal data is mandatory in accordance with the law.

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

- non-automated processing of personal data;
- automated processing of personal data with or without transmission of the received information via information and telecommunication networks;
- combined processing of personal data.

6.9. The security of personal data during its processing in the information system of personal data of PJSC Uralkali is ensured in accordance with the requirements of the Federal Law "On personal data", Decree of the Government of the Russian Federation dated 1 November 2012 No 1119 "On approval of the requirements to the protection of personal data during its processing in information personal data systems" and other laws and regulations of the Russian Federation.

6.10. The Company transfers personal data necessary for the exercise of the powers of federal executive bodies, state extra-budgetary funds, regional state executive bodies, local authorities, bodies of inquiry and investigation, and other authorised bodies on the grounds provided for by the current legislation of the Russian Federation.

6.11. The Company processes data received from www.uralkali.com in accordance with the "Regulations on use" and the "Procedure for the use of personal data" sections on www.uralkali.com.

6.12. The Company ensures confidentiality of personal data of personal data subjects in accordance with Article 7 of Federal Law No 152-FZ "On personal data".

6.13. The Company implements legal, organisational and technical measures to ensure the security of personal data, including:

- appoints a person responsible for organising the processing of personal data in the Company;
- issues documents defining the operator's policy regarding the processing of personal data, internal regulations on the processing of personal data, as well as internal regulations establishing procedures aimed at preventing and detecting violations of the legislation of the Russian Federation, eliminating the consequences of such violations;
- conducts internal control and audit of compliance of personal data processing with federal laws and adopted regulatory legal acts, requirements to the protection of personal data, the Company's policy regarding the processing of personal data, internal regulations of the Company;

- assesses the harm that may be caused to personal data subjects in the event of a violation of this federal law, the ratio between the harm and the measures taken by the operator aimed at ensuring the fulfilment of the obligations provided for by this federal law;
- familiarises employees of the Company directly involved in the processing of personal data with the provisions of the legislation of the Russian Federation on personal data, including the requirements to the protection of personal data, documents defining the Company's policy regarding the processing of personal data, internal regulations on the processing of personal data, and training of these employees;
- determines threats to the security of personal data during its processing in information systems of personal data;
- applies information security tools, including those that passed the conformity assessment procedure in accordance with the established procedure;
- keeps records of machine carriers of personal data;
- establishes the rules for access to personal data processed in the personal data information system, and also ensures registration and accounting of all actions performed with personal data in the personal data information system;
- exercises control over the measures taken to ensure the security of personal data and the level of security of personal data information systems;
- carries out other measures provided for by the legislation of the Russian Federation on personal data.

6.14. The terms of processing, storage of personal data of the persons specified in Item 6.2 of the Policy are determined by the internal regulatory documents of the Company.

6.15. The storage of personal data during automated processing is carried out in the Company's databases located in Russia.

6.16. The storage of personal data during processing without the use of automation tools is carried out subject to conditions that ensure the safety of personal data and exclude unauthorised access to it.

7. Update, correction, deletion and destruction of personal data

7.1. The processed personal data is subject to updating, correction, deletion or destruction in cases of confirmation of the fact of inaccuracy of personal data or illegality of its processing.

7.2. The processed personal data is subject to destruction or depersonalisation upon achievement of the purposes of processing or in case of loss of the need to achieve these purposes, unless otherwise provided by Federal Law dated 27 July 2006 No. 152-FZ "On personal data" or an agreement, and also of the consent to the processing of personal data is withdrawn by the subject of personal data.

7.3. The algorithm for responding to requests from personal data subjects and their representatives, as well as registration of requests, is defined in the internal regulatory documents of the Company.

7.4. Subjects whose personal data is processed by the Company can obtain clarifications on the processing of their personal data by contacting the Company in person or by sending a corresponding written request to the Company's address: 63, Pyatiletki Street, Berezniki, Perm Region.

7.5. In the case of sending an official request to the Company, the request should indicate:

- full name of the subject of personal data or his representative;
- details of the ID document;
- information confirming that the personal data subject has relations with the Company;
- contact details to receive a response from the Company;
- signature of the personal data subject or their representative.

7.6. All actions related to the destruction of personal data carriers are documented in a corresponding report.

8. Access to information containing personal data

8.1. Access to information containing personal data in the Company is permitted to employees of the Company whose job duties include the processing of personal data. The list of positions that are granted the right to access the employee's personal data is determined by an internal regulatory document.

9. Final provisions

9.1. The updating of this Policy in the Company is carried out by the person responsible for organising the processing of personal data of the subjects.

9.2. The person responsible for organising the processing of personal data is appointed by an order of the CEO.

9.3. The person responsible for the methodology of the process of protection and processing of personal data is appointed by an order of the CEO.

9.4. The Policy is published on the official website of the Company at www.uralkali.com and is available to all interested parties.