



POLICY ON PERSONAL DATA PROCESSING IN JOINT STOCK COMPANY RUSSIAN COPPER COMPANY

1. GENERAL PROVISIONS

1.1. In order to maintain its business reputation and ensure compliance with the requirements of the federal legislation, Joint Stock Company Russian Copper Company (hereinafter referred to as the “Company”, “we”) considers it a top priority to ensure an adequate level of protection of personal data processed by the Company - both legally and through organizational and technical measures.

1.2. This document - the Policy on Personal Data Processing in Joint Stock Company Russian Copper Company (hereinafter referred to as the “Policy”) - describes in detail the types of personal data we collect and how such data is processed.

1.3. The Company process personal data of individuals on legal grounds in accordance with Part 1 of Article 6 of Federal Law No. 152-FZ On Personal Data Protection dated July 27, 2006, including but not limited to:

- to exercise and fulfill the functions, powers, and duties assigned to the Company by the legislation of the Russian Federation;
- for the execution or conclusion of a contract to which the personal data subject is a party or beneficiary;
- based on the consent to the processing of personal data.

1.4. As a personal data operator, the Company has implemented various technical and organizational measures to ensure the most comprehensive protection of personal data.

2. WHO WE ARE AND HOW TO CONTACT US

Joint Stock Company Russian Copper Company.

Legal address: 57 Gorkogo St., Yekaterinburg, Sverdlovsk Region, 620000, Russia.

Actual address: 57 Gorkogo St., Yekaterinburg, Sverdlovsk Region, 620000, Russia.

Phone: +7 (343) 365-29-30.

E-mail: info@rcc-group.ru.

Website: <https://rmk-group.ru/>.

Data Protection Officer: Anna Alekseevna Shabarova.

3. PRINCIPLES OF PERSONAL DATA PROCESSING

When processing personal data, the Company adheres to the following principles:

- personal data is processed lawfully and fairly;
- specific and legitimate purposes are determined before the processing (including collection) of personal data begins;
- only the personal data necessary and sufficient for the stated processing purposes is collected;

- processing of personal data is limited to the achievement of specific, predetermined, and lawful purposes;
- personal data is erased once the processing purposes have been achieved or if such purposes are no longer necessary, unless otherwise stipulated by a contract or other agreement with the personal data subject or by the Russian Federation legislation.

4. CONDITIONS AND METHODS OF PERSONAL DATA PROCESSING BY THE COMPANY

4.1. Personal data is processed by the Company only if there is a proper legal basis - such as the data subject's consent - unless otherwise provided for by the current legislation of the Russian Federation on personal data.

4.2. The Company does not process special categories of personal data related to racial or ethnic origin, political opinions, religious or philosophical beliefs, or data concerning a person's sex life.

4.3. The Company processes data concerning health only to the extent required to comply with the labor legislation of the Russian Federation or with the consent of the personal data subject.

4.4. The Company does not use personal data for making decisions based solely on automated processing that result in legal consequences for or otherwise significantly affect the data subject.

4.5. Biometric personal data is processed by the Company only with the explicit consent of the personal data subject.

4.6. Personal data is not disseminated without the prior separate consent of the personal data subject or their legal representative.

4.7. The Company does not disclose or transfer personal data to third parties without a proper legal basis. When transferring personal data, such third parties are informed of the confidentiality requirements.

4.8. In the case of cross-border transfer of personal data, the Person responsible for organizing the processing of personal data, prior to the start of activities for the cross-border transfer of personal data, notifies the authorized body for the protection of the rights of personal data subjects of the intention to carry out cross-border transfer of personal data in accordance with the requirements of clause 4 of Article 12 of Federal Law No. 152-FZ of July 27, 2006 On Personal Data Protection.

4.9. The cross-border transfer of personal data to countries that ensure adequate protection of the rights of personal data subjects is carried out without waiting for the decision of the authorized body regarding the submitted notification.

4.10. The cross-border transfer of personal data to countries that do not adequately protect the rights of personal data subjects is carried out only after receiving a positive decision from the authorized body regarding the submitted notification.

4.11. If a ban on the cross-border transfer of personal data has been received from the authorized body after the start of such transfer, the Person responsible for organizing the processing of personal data is obliged to ensure that the personal data previously transferred to them is erased by the authority of a foreign state, a foreign individual, or a foreign legal entity.

4.12. The Company has the right to entrust the processing of personal data to third parties with the consent of the personal data subject, unless otherwise provided for by the legislation of the Russian Federation, on the basis of an agreement concluded with these persons (hereinafter referred to as the "operator's order").

4.13. Persons who process personal data on behalf of the operator undertake to comply with the principles and rules of personal data processing and protection provided for by the legislation of the Russian Federation. On behalf of the operator, a list of personal data, a list of actions (operations) with personal data that will be performed by a third party processing personal data, and the purposes of personal data processing are determined for each third party; the obligation of such a person to respect confidentiality and ensure the security of personal data during their processing is established; the requirements for the protection of processed personal data in accordance with the legislation of the Russian Federation are specified.

4.14. If the Company entrusts the processing of personal data to another person, the Company is responsible to the personal data subject for the actions of the said person. The person who processes personal data on behalf of the operator is responsible to the Company.

4.15. The Company processes personal data in the following ways:

- using automation tools, including the use of information technologies and technical means, including computing equipment, information technology complexes and networks, means and systems for transmitting, receiving and processing personal data, software tools (operating systems, database management systems, etc.), information security tools used in information systems;

- without using automation tools.

4.16. The processing includes the collection, recording, systematization, accumulation, storage, updating, retrieval, usage, transfer (distribution, provision, access), blocking, deletion, and erasure of personal data.

5. PERSONAL DATA PROCESSED BY THE COMPANY

The list and categories of personal data processed by the Company for each processing purpose, the categories of data subjects, the methods of processing, and the retention periods are defined and approved by an internal order of the Company.

6. SOURCES OF PERSONAL DATA

Personal data may be obtained by the Company directly from the data subject in person, from their authorized representative acting on their behalf, or from a third party (typically the data subject's employer) that provides the data in connection with the performance of a contract or assigns the Company to process the data.

7. RECIPIENTS OF PERSONAL DATA

Third parties to whom personal data may be transferred are listed in the table below:

Personal Data Recipient	Data Subject Categories	Purpose of Transfer
Enterprises (affiliated organizations) ¹	Job applicants/interns (students)	Facilitation of employment or internship placement
Government/municipal authorities	Company and Enterprise employees	Compliance with the legislation of the Russian Federation
Military commissariats		
Ticket booking agencies and visa centers	Company employees	Purchase of travel tickets, hotel reservations, visa application processing
Banks with which payroll agreements are signed	Company employees	Issuance of payroll cards

¹ Hereinafter, the Enterprises are understood to mean organizations that have entrusted the Company with the processing of personal data on the basis of a contract (Part 3 of Article 6 of Federal Law No. 152-FZ dated 27.07.2006 On Personal Data Protection) and/or organizations with which the Company, as a contractor, has concluded a contract for the provision of paid services.

Educational institutions	Company employees	Organization of external training
Organizations conducting workplace assessment		Compliance with occupational health and safety legislation
Medical institutions		Referral for health resort treatment
Health resort		
Certification authorities	Company and Enterprise employees	Issuance of electronic signature certificates
Print shops	Company employees	Production of business cards
Credit institutions, credit rating agencies, consulting firms	CEO of the Company or Enterprises; persons authorized to conclude credit agreements on behalf of the Company or Enterprises; persons authorized to issue payment orders (as specified in signature specimen cards); members of boards of directors; shareholders/participants; beneficiaries	Strategic planning and development; attraction of financing
Mobile network operators	Company employees and their relatives	Compliance with legal requirements for SIM card user identification
Insurance companies	Company employees and their relatives	Enrollment in the corporate voluntary health insurance program
RCC-Security LLC (private security company)	Company and tenant employees; office visitors; authorized representatives of contractors	Enforcement of facility access and internal security control
Analytical resources (as per the Cookie Policy)	Website visitors	Website performance analysis

8. PERSONAL DATA PROTECTION

8.1. The Company has implemented a set of measures aimed at ensuring the security of personal data in the course of its administrative and operational activities.

8.2. To protect personal data, the Company has established the following measures:

- appointment of a person responsible for organizing the processing of personal data, as well as a person responsible for ensuring personal data security;
- development and approval of internal regulations governing the processing and protection of personal data;
- use of information security tools;
- accounting and control of physical media containing personal data;
- detection of unauthorized access to personal data and implementation of measures to prevent such incidents in the future;
- restoration of personal data that has been modified or erased due to unauthorized access;
- establishment of access control rules for personal data processed in information systems, as well as registration and audit of all actions performed on such data within these systems;
- monitoring of the effectiveness of personal data security measures and the protection levels of information systems;

- assessment of potential harm that may be caused to data subjects in the event of a violation of legal requirements, and correlation of such risks with the Company's implemented protection measures;
- ensuring conditions that prevent unauthorized access to physical media containing personal data and safeguarding their integrity;
- ensuring that employees directly involved in the processing of personal data are familiar with applicable personal data legislation, internal data protection regulations, and security requirements;
- establishment of procedures for the destruction of documents and media containing personal data;
- awareness raising and training of Company employees on data loss prevention and information security threats;
- enforcement of access control at the Company's facilities;
- organization of physical security for the Company's premises, buildings, and territories.

8.3. The Company has established an incident response process for information security events. If you become aware of a personal data breach within the Company, please report it via the following channels:

- by phone +7 (343) 365-29-30;
- by email info@rcc-group.ru.

9. RIGHTS AND OBLIGATIONS OF THE COMPANY AS A PERSONAL DATA OPERATOR

9.1. The Company has the right to:

- provide personal data to governmental and other authorized bodies when required by the legislation of the Russian Federation (e.g., tax authorities, law enforcement agencies);
- refuse to disclose personal data in cases provided for by the legislation of the Russian Federation;
- process personal data without the consent of the data subject in cases established by the legislation of the Russian Federation.

9.2. The Company is obliged to:

- provide data subjects, upon their request, with information concerning the processing of their personal data;
 - explain to data subjects the legal consequences of their refusal to provide personal data if such provision is mandatory under the legislation of the Russian Federation;
 - in cases where personal data is not obtained directly from the data subject (except as provided for in Part 4, Article 18 of Federal Law No. 152-FZ On Personal Data Protection dated July 27, 2006), inform the data subject before processing such data of the following:

name (or full name and address) of the operator or its representative;
 purpose and legal basis for personal data processing;
 intended recipients of the personal data;
 rights of the personal data subject as provided by Federal Law No. 152-FZ;
 source of the personal data;

- When collecting personal data, including via the Internet, ensure the recording, systematization, accumulation, storage, clarification (updating, modification), and retrieval of personal data of citizens of the Russian Federation using databases located within the territory of the Russian Federation, except in cases listed in items 2, 3, 4, and 8 of Part 1, Article 6 of Federal Law No. 152-FZ.

10. RIGHTS OF THE PERSONAL DATA SUBJECT

10.1. If the Company processes your personal data based on your consent, you may withdraw such consent at any time.

10.2. You have the right to request information about processing of your personal data, rectification or erasure of your personal data, lodge a complaint regarding the actions of the Company and seek compensation and damages resulting from violations of your rights.

10.3. To exercise your rights, please contact us.

11. AMENDMENTS TO THIS POLICY

11.1. This Policy may be amended from time to time to reflect changes in our personal data processing practices. We will inform you of any material changes to this Policy. Notifications may appear on the website (for example, as a pop-up or banner) before the changes take effect or may be sent to you through other communication channels (e.g., by email if you have provided your contact information).