



Personal Data Processing Policy of Raspadskaya Coal Company, Limited liability company

1. Purpose of the Policy

Protection of the rights to privacy, personal and family secrets, when processing personal data in RUK LLC, branches and companies, the powers of the sole executive body of which have been transferred to the Managing Company RCC LLC: JSC UCC Yuzhkuzbassugol (branch Erunakovskaya-VIII Mine, branch Tomskaya Mine, branch Kusheyakovskaya Mine, JSC Kuznetskpogruztrans), JSC ORMZ, JSC CWP Abashevskaya, JSC CWP Kuznetskaya, Abashevskaya Mine LLC, Alardinskaya Mine LLC, Esaulskaya Mine LLC, Osinnikovskaya Mine LLC, Uskovskaya Mine LLC, ATP Yuzhkuzbassugol LLC, Mining equipment assembly company LLC, YuzhKuzbassGRU LLC, PJSC Raspadskaya, JSC Raspadskaya WP, JSC Raspadsky open pit (Coal Mine Branch), JSC Raspadskaya-Kokosovaya (Koksovy open pit branch), JSC Tomusinsk Handling and Transport Company, Montazhnik Raspadskoy LLC, Olzherass Sinking Company LLC (hereinafter collectively referred to as the “Company”), in accordance with the law.

2. Basic purposes and principles of personal data processing

2.1. The Company processes personal data for the following purposes:

- ensure compliance with legislative and other regulatory legal acts of the Russian Federation, as well as the Company's policies and procedures;
- exercise the functions, powers and liabilities assigned to the Company by the laws of the Russian Federation, including the provision of personal data to government authorities, the Pension Fund of the Russian Federation, the Social Insurance Fund of the Russian Federation, the Federal Compulsory Medical Insurance Fund, as well as other state bodies;
- regulate labor relations with the employees of the Company (assist in employment, training and promotion, ensure the personal

safety of employees, control the quantity and quality of work performed, ensure the safety of property);

- offer the employees of the Company as well as their families additional guarantees and compensations;
- protect the life, health and other vital interests of personal data subjects;
- draft, execute, perform and terminate contracts with Company's contractors;
- arrange and maintain access and on-premises security conditions at the facilities of the Company;
- arrange and maintain directories for information support of the Company's activities;
- perform under judicial acts, acts of other bodies or officials to be performed in accordance with the enforcement laws of the Russian Federation;
- exercise the rights and legitimate interests of the Company in the framework of the implementation of the types of activities provided for by the Articles of Association of the Company;
- and for other legal purposes.

2.2. The following principles are observed when processing personal data in the Company:

- personal data is processed on a legal and fair basis;
- only personal data that meets the purposes of processing is subject to processing.
- the processing of personal data is limited by the achievement of specific, predetermined and legitimate purposes;
- processed personal data should not be excessive in relation to the stated purposes of processing.
- processing of personal data that is incompatible with the purposes of collecting personal data is not allowed;



3. Categories of personal data subjects

3.1 The Company processes the personal data of its employees, as well as other personal data subjects who are not in labor relations with the Company, in order to achieve the processing purposes specified in this Policy.

4. Categories of processes personal data

4.1 The composition of personal data processed by the Company is determined in accordance with the laws of the Russian Federation and the Company's policies and procedures.

4.2 Special categories of personal data relating to race, nationality, political views, intimate life, religious and philosophical beliefs is not processed in the Company.

4.3 For the purpose of information support, the Company may create publicly available sources (including directories and address books), which may include personal data reported by the subject of personal data subject to their written consent, unless otherwise provided by the laws of the Russian Federation.

4.4 The Company may process biometric personal data of personal data subjects only subject to written consent of the subjects, unless otherwise provided by the laws of the Russian Federation.

5. Conditions of personal data processing

5.1 The personal data in the Company is processed conditional to consent of the personal data subject to the processing of their personal data, unless otherwise provided by the personal data laws of the Russian Federation.

5.2 The Company does not disclose to third parties and does not distribute personal data without the consent of the personal data subject, unless otherwise provided by Federal law.

5.3 The Company has the right, with the consent of the personal data subject, to entrust the processing of his personal data to another person under an agreement concluded with this person.

5.4. If the processing of personal data falls under the requirements of the European Data Protection Regulation (GDPR), then the data subject has the right to access personal data, correct it, limit its processing, deletion, portability (request a list of their processed personal data, issue an order to its processing by a third party), in which case the Company

ceases to be responsible for the processing and objection to the processing of personal data (the right is exercised by granting the right to file a complaint with the supervisory authority of the subject's country of permanent residence in the EU, the country of their work or the country where, in the opinion of subject, their rights were violated).

6. List of activities and methods of personal data processing

6.1 The Company collects, records, systematizes, accumulates, stores, clarifies (updates, amends), extracts, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes and destroys personal data.

6.2 The personal data is processed in the Company in the following ways:

- manual processing of personal data;
- automated processing of personal data with or without information transfer via information and telecommunication networks.

7. Ensuring safety of personal data

7.1 The measures necessary and sufficient to ensure that the Company fulfills the obligations of operators stipulated by the laws of the Russian Federation in the field of personal data include:

- appointment of a person responsible for organizing the processing of personal data;
- adoption of policies and procedures and other documents in the field of personal data processing and protection;
- determination of threats to the security of personal data during its processing in personal data systems;
- application of organizational and technical measures to ensure the security of personal data during its processing in personal data systems;
- familiarization of the employees of the Company directly involved in the processing of personal data with the provisions of the laws of the Russian Federation on personal data and local acts on the processing of personal data and, if necessary, arrangement of training for such employees;
- obtaining consents of personal data subjects to the processing of their personal data, except as otherwise provided by the laws of the Russian Federation;



- implementation of internal control over the measures taken to ensure the security of personal data;
- other measures provided for by the personal data laws of the Russian Federation.

8. Control and responsibility

8.1 The person responsible for organizing the personal data processing organizes a continuous process of monitoring compliance in the Company with the requirements of Federal laws and Company's policies and procedures in the field of personal data.

8.2 Officers of the Company guilty of violating the rules governing the processing and protection of personal data shall be liable under the laws of the Russian Federation.

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