



## PRIVACY POLICY

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## 1. INTRODUCTION

11. **EVRAZ TRANSNET** is a Limited liability company incorporated under the laws of the Russian Federation, with Company Registration Number 1126952000966, having its registered office at Letnikovskaya street 10/2, Moscow, Russia (hereinafter (the "**Company**", "**we**" or "**us**") and operates the website [www.evraztransnet.com](http://www.evraztransnet.com) (hereinafter the "**Website**").
12. This Privacy Policy ("**Policy**") and any other document referred to on it explains the privacy practices employed by the Company in providing the Service (as they defined in the Client Agreement) to its customers (collectively "**Client**" and/or "**You**") and shall be read in the light of the Agreement held between the parties. Policy sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.
13. We are committed to protecting your privacy and making sure that any personal data we collect are processed in accordance with the EU General Data Protection Regulation (the "**GDPR**") and applicable laws and regulations.
14. When collecting, processing and storing Personal Data provided by you, we are subject to the provisions of the Regulation of Electronic Communications and Postal Services Law of 2004 and the General Data Protection Regulation (GDPR) (EU) 2016/679 effected as from the 25th of May 2018.
15. The Client's privacy is important to the Company, therefore the Company shall treat all data collected by, or transmitted to, the Company with care, in particular, personally identifiable information, and this Policy describes how, when, and why the Company shall collect such information.
16. References in this document to "**Personal Data**" means any information that enables you to be identified as an individual or legal entity and recognized directly or indirectly by reference to an identifier such as a name, an identification number, location data.
17. Personal Data includes, but is not limited to, a first and last name, ID numbers, email and physical addresses, and other contact information. Any information that does not enable identification, location, or contacting of the you, such as aggregated information, is "**Anonymous Information**", and the Company may Process Anonymous Information in any way it so chooses without prior notice the Client.
18. Please read this Policy carefully. By accessing the Services, you agree to be bound by the Policy below. If you do not agree to the Policy below, do not use the Services or the Website.
19. By accepting and/or using (collectively, "**Using**" or "**Use**") the Service, the Client express his consent to such collection, processing, storage and use of Personal Data by the Company, our Associates or Third Parties in accordance with the provisions contained herein, and agree that processing and storage of Personal Data provided to the Company by the Client may be carried out in or from any jurisdiction within or outside of the European Union including in or to countries or territories which do not offer the same level of protection of Personal Data as is enjoyed within the European Union.

110. In addition, as a recipient of our Service, the Client commits to provide appropriate notice of its privacy practices to, and obtain the necessary permissions and consent from any User whose Personal Data is collected, received, used, and/or disclosed (collectively, “**Process(ed)**”) by the Company.
111. The Client further represents and undertakes that where it is a non-physical person providing to us Personal Data of any individual or where the Client is an individual providing the Company with Personal Data of any individual other than the Client, thereby undertakes and represents that such person, whose Personal Data is collected, stored and processed in accordance with the provisions contained herewith, has been informed of and has given their consent to such collection, storage and processing of their Personal Data in accordance with the provisions contained herein and that they have been informed of their rights in relation to their Personal Data which is held and processed in accordance with the provisions contained herein.

## **2. COLLECT PERSONAL DATA**

2.1. We may collect Personal Data about you in a number of circumstances, including:

- when you or your organization contact us to seek advice or services from us;
- when you or your organization, make an enquiry or otherwise interact on our website;
- when you or your organization offer to provide or provide services to us and/or clients;
- when you apply for employment or job applicants.

2.2. In some circumstances, we collect Personal Data about you from a third party source. We may receive information about you if you use any of the other websites we operate or the other services we provide. In this case we will have informed you when we collected that data or that it may be shared internally and combined with data collected on this site. We are also working closely with third parties (including, for example, business partners services etc.).

2.3. The Personal Data we collect may include:

- Personal Details, such as your name, surname, job title/profession, date of birth;
- Contact information, such as postal address, including your home address, where you have provided this to us, business address, telephone number, mobile phone number and email address;
- Identification information, such as ID number and/or passport number;
- Recruitment/selection data, such as qualifications, professional background and any other information contained in your CV, application form, record of interview or interview notes and/or any other assessment material;
- Payment data, such as data necessary for processing payments, including bank account and other related billing information;

- Further financial and/or business information necessarily processed in a project or client contractual relationship with the Company or voluntarily provided by you, such as instructions given, payments made, requests and projects;
- Information collected from publicly available resources, integrity data bases and agencies where this is relevant to the services offered to you;
- Special categories of personal data (sensitive data): in connection with the provision of Services to you, may on some occasions need to ask for certain sensitive information. The processing of sensitive data will only be carried out by us in full compliance with the GDPR and applicable national legislation, on the basis of your explicit prior consent;
- Other personal data regarding your preferences where it is relevant to Services that we provide; and/or
- Details of your visits to our Website;
- Technical information, including the Internet Protocol (IP) used to connect your computer to the Internet, your login information, browser type and version, time zone setting.

### **3. ARE YOU REQUIRED TO PROVIDE PERSONAL DATA?**

- 3.1 As a general principle, you will provide us with your Personal Data entirely voluntarily.
- 3.2 There are generally no detrimental effects for you if you choose not to consent or to provide personal data.
- 3.3 However, there are circumstances in which the Company cannot take action without certain of your personal data, for example because the collection of personal data is required to process with your instructions or orders or to carry out a legally required compliance screening.
- 3.4 In these cases, it will unfortunately not be possible for us to provide you with what you request without first obtaining the relevant personal data and we will notify you accordingly.

### **4. PROCESSING OF PERSONAL DATA**

- 4.1 The Company uses your Personal Data for the purposes for which you have supplied it to us, to include:
  - for providing advice and/or other services you may have requested;
  - for responding to your requests for advice and/or other enquiries;
  - for ensuring compliance with our obligations (e.g. for compliance with our obligations under applicable anti-money laundering laws);
  - for the purposes of processing your application if you are a candidate for employment with the Firm;
  - for defending our legal rights, where applicable;
  - for any purpose related and/or ancillary to any of the above or any other purpose for which your

Personal Data were provided to us;

- where you have provided to us with your explicit prior consent, we may also use the information to provide you with newsletters, briefings and other publication about developments and matters which we believe may be of interest to you
- to carry out our obligations arising from any contracts entered into between you and us and to provide you with information, products and services that you request from us;
- to provide you with information about other service we offer that are similar to those you have already enquired about;
- to notify you about changes to our service;

## **5. DATA SHARING**

5.1 We may share your Personal Data in the following circumstances:

- to our subsidiaries or affiliates to the extent this is necessary for the purposes of provision of services;
- to third parties to whom we outsource certain services, such as document processing and translation, provision of IT systems, support or software, document and information storage;
- to third parties engaged in the course of services provided to clients such as opposing parties and their lawyers, tax advisors or expert valuers;
- to foreign companies for the purpose of obtaining foreign advice upon your instructions;
- where we are required to do so by law or where it is necessary for the purpose of, or in connection with, legal proceedings or in order to exercise or defend legal rights;
- we may also share your personal data with any third party to whom we assign or novate any of our rights or obligations;

5.2 Otherwise, we will only disclose your personal data when you direct us or give us your express consent.

## **6. PERSONAL DATA ABOUT OTHER INDIVIDUALS**

6.1 If you provide us with Personal Data about another individual, you must ensure that you are entitled to disclose such personal data to us and that you have provided the relevant data subjects of all mandatory data privacy notifications and information under the GDPR and applicable legislation and regulation, to include a notification as to their legal rights as data subjects.

6.2 For that purpose, you must also ensure that the individual concerned is aware of the contents of the present Privacy Policy, as those matters relate to that individual, to include our identity, how to contact us, the purposes of collection of the data, how we may use and/or share the data and his/her relevant rights.

## **7. CONFIDENTIALITY AND SECURITY OF YOUR PERSONAL DATA**

- 7.1. The Company is committed to protect the personal information you provide to us. To this end, we have implemented information security policies, rules and technical measures to protect the personal information data under our control from unauthorized access, improper use and/or disclosure, unauthorized modification and/or unlawful destruction and/or accidental loss.
- 7.2. Personal data may be kept on our personal data technology systems or in paper files.

## **8. DATA RETENTION**

- 8.1. The Company will generally retain Personal Data for the period necessary to fulfil the purposes for which it was originally collected and thereafter as required or permitted by law or as is necessary in order for the Company to be able to defend, respond to or conduct prospective or actual legal claims or proceedings.
- 8.2. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

## **9. COOKIES**

- 9.1. Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site.
- 9.2. Cookies are small amounts of data that are stored on your browser, device, or the page you are viewing. Some cookies are deleted once you close your browser, while other cookies are retained even after you close your browser so that you can be recognized when you return to a website.
- 9.3. You may block cookies by reviewing your internet browser settings, to exercise choices you have for certain cookies. If you disable or delete certain cookies in your internet browser settings, you might not be able to access or use important functions or features of our site.

## **10. YOUR RIGHTS**

- 10.1. In relation to the Personal Data we hold about you, you have rights under the data protection laws. If you would like to exercise, or discuss, any of these rights, please do contact us using the details set out below. At our discretion we may require you to prove your identity before providing the requested information.
- 10.2. You have the right to:

- **Right to access:** upon your request, we will provide confirmation as to whether or not your personal data are being processed and where that is the case, access to the personal data. This enables you to receive a copy of the personal data we hold about you. If you require multiple copies of your personal data, we may charge a reasonable fee.
- **Right to rectification:** you have the right to require that any incomplete or inaccurate personal data that we process about you is amended.
- **Right to erasure:** you are entitled to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. There are also certain exceptions where we may not always be able to comply with your request for erasure, for specific legal reasons which will be notified to you, if applicable, at the time of your request. One example is where the personal data is required for compliance with law or in connection with claims;
- **Right to restriction of processing:** you have the right to request that we restrict our processing of your Personal Data in certain circumstances, such as where you believe such data to be inaccurate, our processing is unlawful or we no longer need to process such data for a particular purpose, but where we are not able to delete the data due to a legal or other obligation.
- **Right to data portability:** you have the right to request that we transmit the Personal Data we hold in respect of you to another data controller.
- **Right to object to processing:** where we are processing your personal data based on legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. However, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Right to withdraw consent:** if you have consented to our processing of your Personal Data, you have the right to withdraw your consent at any time, free of charge.
- **Right to lodge a complaint:** if you are concerned about any aspect of our Privacy Policy or privacy practices, including the way we've handled your personal information, you have the right to lodge a complaint for Personal Data protection.

## 11. REGULATORY DISCLOSURE

- 11.1 The Company reserves the right to disclose Personal Data to third parties where required by law, regulatory, law enforcement or other government authority of a competent jurisdiction in order to



protect our rights and/or to comply with such legal proceedings.

112. Such disclosure shall occur on a 'need-to-know' basis, unless otherwise instructed by a regulatory or other government authority. Under such circumstances, The Company shall expressly inform the third party regarding the confidential nature of the information.
113. The Client acknowledges and accepts that the Company is required to disclose information in relation to any US reportable persons to the relevant authorities, in accordance with the reporting requirements of FATCA but any other reportable person in accordance with the CRS. The Client may contact the Company for additional information.

## **12. DIRECT MARKETING**

121. We may use the information you give us for direct marketing from us only if you give us your consent.
122. You can opt-out of receiving direct marketing from us at any time by sending an email to [info@evraztransnet.com](mailto:info@evraztransnet.com)

## **13. LINKS TO THIRD PARTY WEBSITES**

131. Our website, newsletters, email, updates and other communications, if any, may from time to time, contain links and references to other websites administered by unaffiliated third parties.
132. This Privacy Policy does not apply to such third party websites. When you click a link to visit a third party website, you will be subject to that website's privacy practices.

## **14. UPDATES TO THIS PRIVACY POLICY**

141. We reserve the right to update and change this Privacy Policy from time to time in order to reflect any changes to the way in which we process your personal data or changing legal requirements.
142. In case of any such changes, we will post the changed Privacy Policy on our website or publish it otherwise. The changes will take effect as soon as they posted on the Website.

## **15. HOW TO CONTACT US**

If you have questions or comments regarding this Privacy Policy or our privacy practices or you want to exercise any of your legal rights, please contact us using the details set out below:

Email: [info@evraztransnet.com](mailto:info@evraztransnet.com)

By Post: Letnikovskaya street 22/1, Moscow, Russia

Contact number: +7-495-419-28-11