

APPENDIX No. 1
to Order dated “01” December 2025 No. PDn-14

**POLICY
on Personal Data Processing in
SYMOIL LLC**

MOSCOW
2025

1. General Provisions

1.1. The Policy on personal data processing in SYMOIL LLC (hereinafter, the Policy) is aimed at protecting the rights and freedoms of individuals whose personal data is processed by SYMOIL LLC (hereinafter, the Operator).

1.2. The Policy has been developed pursuant to sub-clause 2 clause 1 article 18.1 of Federal Law No. 152-FZ dated July 27, 2006, "On Personal Data" (hereinafter, the Personal Data Law).

1.3. The Policy contains information that is a subject to disclosure in accordance with clause 1 article 14 of the Personal Data Law and is a publicly available document.

1.4. The following basic terms are used in the Policy:

- "blocking of personal data" means temporary suspension of personal data processing (except for cases when processing is necessary for adjusting personal data);
- "personal data information system" means a set of personal data contained in databases and information technologies and technical means ensuring its processing;
- "personal data processing" means any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collecting, recording, systematising, accumulating, storing, updating (renewing, altering), retrieving, using, transferring (disseminating, providing, accessing), depersonalising, blocking, deleting, destroying personal data;
- "operator" means a governmental body, a municipal body, a legal entity or a natural person who, independently or jointly with other persons, organises and (or) carries out personal data processing, as well as determines the purposes of personal data processing, the composition of personal data to be processed and actions (operations) involving personal data;
- "personal data" means any information directly or indirectly concerning a natural person who is defined or is being defined (a personal data subject);
- "provision of personal data" means actions aimed at disclosing personal data to a certain person or a certain circle of persons;
- "dissemination of personal data" means actions aimed at disclosing personal data to an indefinite circle of persons;
- "destruction of personal data" means actions resulting in impossibility of restoring the content of personal data in a personal data information system and (or) in destruction of material media containing personal data.

1.5. The Policy shall enter into force as of the date of its approval and remain effective for an indefinite period of time until it is replaced by a new policy.

2. Information on the Operator

2.1. The Operator carries out its activities at the following address: 125371, Russian Federation, Moscow, Volokolamskoye Highway st., Building 89, Floor 4, Office 407.

2.2. By the order of the General Director of SYMOIL LLC, a person responsible for organizing personal data processing has been appointed.

3. Principles of Personal Data Processing

3.1. Personal data shall be processed by the Operator on a legal and fair basis.

3.2. Personal data processing by the Operator shall be limited to achieving specific, predetermined and legal purposes. Personal data that is incompatible with the purposes of personal data collection is not processed by the Operator.

3.3. The Operator shall not combine databases containing personal data the processing of which is carried out for purposes that are incompatible with each other.

3.4. Only personal data that meets the purposes of their processing shall be a subject to processing.

3.5. The content and volume of personal data that is processed shall correspond to the purposes of personal data processing established by the Operator and shall not be excessive in relation to the stated purposes of their processing.

3.6. The accuracy of personal data, their sufficiency and, when necessary, their relevance in relation to the purposes of personal data processing shall be ensured when personal data processing is carried out.

3.7. Personal data shall be stored by the Operator in a form that allows identification of a personal data subject for no longer than required by the purposes of personal data processing, unless a longer period of personal data storage is established by federal law or a contract to which the personal data subject is a party, a beneficiary or a guarantor.

3.8. Processed personal data, upon achievement of the purposes of processing or in case of loss of the necessity to achieve such purposes, shall be a subject to destruction or depersonalisation, unless otherwise provided by federal law.

3.9. The Policy shall enter into force as of the date of its approval and remain effective for an indefinite period of time until it is replaced by a new policy.

4. Information on Personal Data Processing

4.1. The Operator processes personal data using both automated and non-automated methods, with or without the use of computer equipment.

4.2. Actions involving personal data processing include collecting, recording, systematising, accumulating, storing, updating (renewing, altering), retrieving, using, transferring (providing, accessing), depersonalising, blocking, deleting, and destroying.

5. Legal Basis for Personal Data Processing

5.1. The Operator shall process personal data in accordance with the following normative and legal acts:

- Articles 23-24 of the Constitution of the Russian Federation;
- Articles 86-90 of the Labour Code of the Russian Federation;

- The Civil Code of the Russian Federation;
- The Tax Code of the Russian Federation;
- Article 6 of the Personal Data Law;
- The Charter of SYMOIL LLC;
- Order of the State Archive dated December 20, 2019, No. 236 "On Approval of the List of Standard Administrative Archival Documents Formed in the Course of Activities of Governmental Bodies, Local Government Bodies, and Organizations with Indication of Storage Periods".

6. Subjects, Categories, Purposes, and Grounds for Personal Data Processing

6.1. The subjects, purposes, and grounds for personal data processing are specified in Table 1.

Table 1

No.	Data Subjects	Purposes of Personal Data Processing	Grounds for Personal Data Processing
1.	Employees	Ensuring compliance with the Labour legislation of the Russian Federation; personnel and accounting records; ensuring compliance with the tax and pension legislation of the Russian Federation; voluntary medical insurance; provision of corporate communications; organisation of training.	Processing is carried out with the consent of the personal data subject; The personal data processing is necessary for the purposes provided by an international treaty or a law of the Russian Federation, including the exercise and performance of the functions, powers, and duties imposed on the Operator by Russian legislation.
2.	Relatives of employees	Ensuring compliance with the tax legislation of the Russian Federation	Processing is necessary for the purposes provided by an international treaty or a law of the Russian Federation, including the exercise and performance of the functions, powers, and duties imposed on the Operator by the

			legislation of the Russian Federation.
3.	Former employees	Personnel and accounting records; ensuring compliance with the tax and pension legislation of the Russian Federation	Processing is necessary for the purposes provided by an international treaty or a law of the Russian Federation, including the exercise and performance of the functions, powers, and duties imposed on the Operator by the legislation of the Russian Federation.
4.	Job applicants	Recruitment of personnel (applicants) for vacant positions of the Operator	Processing is carried out with the consent of the personal data subject.
5.	Representatives of counterparties	Preparation, conclusion, and execution of civil law contracts	Processing is necessary for the purposes provided by an international treaty or a law of the Russian Federation, including the exercise and performance of the functions, powers, and duties imposed on the Operator by the legislation of the Russian Federation.
6.	Employees of counterparties		
7.	Individual entrepreneurs		Processing is necessary for the performance of a contract to which the personal data subject is a party, a beneficiary, or a guarantor, as well as for concluding a contract at the initiative of the personal data subject or a contract under which the personal data subject
8.	Clients		
9.	Self-employed individuals		
10.	Individuals under civil law contracts		

			will be a beneficiary or a guarantor.
11.	Website visitors	Processing of the website's requests; evaluation of attendance and analysis of the users' behaviour on the website	Consent of the subject to personal data processing.

6.2. The Operator processes personal data in the scope that is approved by order of the General Director.

7. Description of Personal Data Processing

7.1. The Operator does not make decisions related to the interests of personal data subjects based solely on automated processing of their personal data.

7.2. The Operator grants access to subjects' personal data only to persons for whom such access is necessary to perform their official duties. The list of employees with the granted access to personal data processing is approved by order of the General Director of SYMOIL LLC.

7.3. Personal data is processed with and without the use of automation tools.

7.4. The Operator does not disclose personal data to third parties without their consent.

7.5. Personal data is stored at the address specified in clause 2.1 of the Policy.

7.6. The Operator does not carry out cross-border transfer of personal data.

7.8. Processing of website users' personal data.

7.8.1. The Operator collects personal data of users through feedback forms located on the Operator's website pages.

7.8.2. The website users give their consent to personal data processing by checking a special checkbox before submitting personal data via the feedback form. A subject who has not checked the consent box is deprived of the technical ability to send data to the Operator.

7.8.3. Personal data permitted for processing under this Policy are provided by users during order processing on the website and include:

- email address,
- full name,
- phone number,
- cookies files.

7.8.4. Processing periods for website users' personal data: 3 years or a shorter period upon receipt of a consent withdrawal. After a consent withdrawal or achievement of the processing purposes, website users' personal data shall be destroyed within 30 calendar days unless otherwise provided by Russian legislation.

7.8.6. The Operator receives users' personal data on-line from the server owned by REG.RU Domain Name Registrar LLC (TIN 7733568767), located at: 123098, Moscow, Akademika Kurchatov Square, Building 1, Building 301, 5th floor, room 501A.

7.8.7. The Operator uses Yandex Metrika internet service for evaluating attendance and analysing users' behaviour on the website. The Operator receives users' personal data on-line from the server owned by YANDEX LLC. Actual server address: 119021, Russia, Moscow, Tolstoy St., Building 16.

7.8.8. The Operator uses cookies files necessary for the website operation and sets them in response to user's actions such as logging in or form filling. The users are informed about the use of cookies on the website's homepage.

8. Conditions for Personal Data Processing

8.1. The Operator does not provide or disclose information containing personal data to third parties without the subjects' consent, except in cases necessary to prevent threats to life and health and in cases established by federal laws (Social Fund of Russia, military enlistment office, tax authorities, etc.).

8.2. Upon a reasoned request solely for performing functions and powers imposed by Russian legislation, personal data may be transferred without their consent to

- judicial bodies in connection with the administration of justice;
- federal security service authorities;
- prosecutor's offices;
- police authorities;
- and other authorities and organizations in cases provided by mandatory normative legal acts.

8.3. The Operator ceases personal data processing in the following cases:

- achievement of the processing purposes or the maximum storage periods – within 30 days;
- loss of necessity to achieve the processing purposes – within 30 days;
- provision by a subject or their legal representative of information confirming that the personal data has been obtained unlawfully or is not necessary for the stated processing purpose – within 7 days;
- impossibility to ensure the legality of personal data processing – within 10 days;
- withdrawal by a subject of the consent to personal data processing, if the storage of the personal data is no longer required for the processing purposes – within 30 days;
- expiration of the limitation periods for relations within which processing is or has been carried out.

9. Measures to Ensure Personal Data Security

9.1. Security of personal data processed by the Operator is ensured by implementing legal, organizational, and technical measures necessary and sufficient to comply with the requirements of the personal data protection legislation.

9.2. The Operator shall take necessary organizational and technical measures to protect personal data from accidental or unauthorized access, destruction, alteration, blocking, copying, provision, distribution, and other illegal actions.

9.3. The Operator shall implement the following organizational and technical measures necessary and sufficient to fulfil obligations under the Personal Data Law and normative legal acts adopted thereunder:

- appointment of officials responsible for organizing and protecting personal data processing;
- issuance of local acts on personal data processing and procedures to prevent and detect violations of the Russian Federation's legislation and remedy their consequences;
- internal control and/or audit of compliance of personal data processing with the Personal Data Law, protection requirements for personal data security, the policy and local acts of the Operator;
- harm assessment for data subjects in case of a Personal Data Law violation and comparison with the measures taken by the Operator;
- familiarization of employees directly involved in personal data processing with the personal data legislation, including protection requirements, the policy and local acts of the Operator, and/or their training;
- identification of personal data security threats during processing in personal data information systems;
- application of organizational and technical measures to ensure personal data security in personal data information systems at the required protection level;
- use of information protection means that have passed conformity assessment procedures where necessary to neutralize actual threats;
- assessment of effectiveness of the security measures;
- accounting of machine media containing personal data;
- detection of unauthorized access to personal data and taking measures;
- recovery of personal data that has been altered or destroyed due to unauthorized access;
- establishment of rules to access personal data in personal data information systems and registration/accounting of all actions with personal data;
- control over the security measures and protection levels of personal data information systems.

10. Rights of Personal Data Subjects

10.1. A personal data subject has the right to obtain information regarding the processing of their personal data, including:

- confirmation of personal data processing by the Operator;
- legal grounds and purposes of personal data processing;
- methods and purposes of personal data processing used by the Operator;

- name and location of the Operator, information on persons (except Operator's employees) having access to personal data or to whom personal data may be disclosed based on a contract or federal law;
- processed personal data related to the respective subject, source of its receiving (unless otherwise provided by federal law);
- personal data processing and storage periods;
- procedure for exercising subject's rights under the Personal Data Law;
- information on completed or intended cross-border data transfer;
- full name (including patronymic, if applicable) and address of a person who is responsible for personal data processing on behalf of the Operator, if personal data processing is or will be entrusted to such person;
- other information provided by the Personal Data Law or other federal laws.

10.2. A personal data subject has the right to demand from the Operator to update, block, or destroy their personal data if it is incomplete, outdated, inaccurate, illegally obtained, or not necessary for the states processing purpose, and to take legal measures to protect their rights.

10.3. If a personal data subject believes that the Operator processes their personal data in violation of the Personal Data Law or otherwise violates their rights and freedoms, the subject may appeal the Operator's actions or inaction to the superior authority for protection of data subjects' rights (Federal Service for Supervision of Communications, Information Technology, and Mass Media – Roskomnadzor) or in court.

10.4. A personal data subject has the right to protect their rights and legitimate interests, including compensation for damages and/or moral harm in court.

10.5. To exercise their rights and legitimate interests, personal data subjects may contact the Operator or send a request personally or through a representative. The request must contain information specified in Part 3 Article 14 of the Personal Data Law.

11. Final Provisions

11.1. Control over compliance with the Policy requirements shall be exercised by the person responsible for organizing personal data processing in SYMOIL LLC.

11.2. Other rights and obligations of the personal data Operator are determined by the Personal Data Law and other normative legal acts on personal data protection.

11.3. Officials guilty of violating norms regulating personal data processing and protection bear material, disciplinary, administrative, civil, and criminal liability in accordance with the federal laws.