

# NLMK Group Personal Data Processing and Protection Policy



Policy LG-162-0001-2019

NLMK Group Personal Data Processing and Protection Policy (hereinafter referred to as the Policy) determines the framework of personal data processing and protection for NLMK Group companies.

The Policy was designed to meet the requirements of the Russian legislation on personal data processing and protection and of the General Data Protection Regulation (EU Regulation 2016/679 dd. 27.04.2016) (hereinafter referred to as GDPR).

The Policy describes the legal grounds for personal data processing, the principles and purposes of such processing, its rules, the personal data protection measures being taken, and the rights of personal data subjects.

The provisions of this Policy are binding for all NLMK Group companies (hereinafter referred to as the Company).

This Policy shall be published on the NLMK Group corporate website.

## PURPOSES AND PRINCIPLES OF PERSONAL DATA PROCESSING

### PERSONAL DATA PROCESSING PURPOSES

The Company shall process personal data for the following purposes:

- Labour relations in line with employment contracts and the Russian Federation Labour Code.
- Contractual relations under contracts concluded with counterparties as well as the preparation of such contracts for conclusion and execution.
- Social programmes for current and former employees and other persons, including veterans, aimed at providing them with benefits and guarantees.
- Professional training programmes for employees and other persons implemented jointly with educational institutions.
- Providing access to the Company's territory.
- Activities related to the consideration of the Company shareholders' interests.
- Military registration and reservation of citizens from the Russian Federation Military Reserve in case of mobilization and war time.
- Implementing a unified NLMK Group policy for its core operational areas (HR, Anti-Corruption Policy, OHS Policy, etc.)
- Implementing a policy of government relations and relations with local authorities.
- Communication with the employees, suppliers, and customers of the companies.
- Informing employees about NLMK Group's corporate culture and events.
- Assisting employees in arranging internal communications.
- Ensuring employee and counterparty access to the NLMK Group IT infrastructure.
- Assisting in employment.
- Carrying out other types of business activities within the legislative framework of the Russian Federation, subject to the Russian Federation and European Union legislation on personal data processing and protection.

### SCOPE AND CATEGORIES OF PERSONAL DATA PROCESSED AND CATEGORIES OF PERSONAL DATA SUBJECTS

- The content and scope of the personal data processed shall meet the declared processing purposes. Processing personal data that is in excess of the declared purposes shall not be permitted.
- As part of personal data processing, the Company shall collect, record, file, accumulate, store, verify (update, modify), use, transfer (distribute, provide, provide access to a limited number of persons in line with the relevant legislation), depersonalize, block, delete, and destroy personal data.

## PERSONAL DATA PROCESSING METHODS

- The Company shall process personal data with and without automation in line with the requirements of current legislation.
- Provision of access to personal data shall be regulated by local by-laws of the Company. Such access shall be provided only to those employees who need the personal data to perform their professional duties.
- The Company shall make no decisions leading to legal implications for the personal data subjects or otherwise affecting their rights and legitimate interests based on the automated processing of their personal data.
- The Company has the right to delegate personal data processing to a third party (a processor), subject to receiving the personal data subject's consent, unless otherwise stipulated by federal law, based on the contract concluded with the third party and contingent upon the relevant guarantees that the appropriate technical and administrative measures shall be taken.

## CONDITIONS FOR PERSONAL DATA PROCESSING TERMINATION

**The Company shall terminate personal data processing in the following cases:**

- The purposes of personal data processing are achieved or their achievement is no longer necessary.
- The personal data subject submits a request to terminate the processing.
- The consent of the personal data subject is revoked (if such revocation entails personal data destruction).
- An instruction to terminate the processing is received from the competent authority responsible for protecting the rights of personal data subjects.

## PERSONAL DATA PROTECTION SYSTEM

**The Company shall ensure comprehensive protection of personal data by relying on the following:**

- › Russian or international legislation on personal data protection.
- › The nature, context, and purposes of personal data processing.
- › The principle of privacy by default. The Company shall introduce administrative and technical measures to ensure that by default the information system processes a minimal amount of information required to achieve the processing purposes.
- › Processes and scope of personal data processing.
- › Economic evaluation of the costs related to implementing the means and methods of personal data protection.
- › Risk evaluation: probability and severity of possible consequences for the personal data subjects (risks of accidental or illegal destruction, loss, modification, unauthorized disclosure or access to personal data that is being or has been transmitted or otherwise processed).
- › The principle of privacy by design. The Company shall plan out relevant administrative and technical personal data protection measures at the process design stage of personal data processing. When selecting the protection measures, the Company shall take into account the current status of technology, the implementation costs, the nature, scope, context, and purposes of processing as well as the risks for rights and freedoms of individuals.

In the course of personal data processing the Company shall take all necessary legal, administrative, and technical measures to ensure the protection of personal data against unauthorized or accidental access, destruction, modification, blocking, copying, submission, or distribution as well as other unlawful actions with the personal data.

## PERSONAL DATA PROCESSING PRINCIPLES

The Company shall be guided by the following principles to enable efficient personal data processing:

- > **Legality.** Personal data processing shall be performed on legal and fair grounds.
- > **Impartiality and transparency.** Personal data processing shall be performed in an impartial and transparent manner as regards the personal data subject.
- > **Restriction of processing purposes.** Personal data processing shall be restricted by the achievement of specific purposes that are legal and identified in advance; any further processing of personal data with methods that are incompatible with such purposes shall not be allowed. Merging databases containing personal data that is processed for incompatible purposes shall not be permitted. Only personal data that meets the processing purposes shall be processed.
- > **Processing minimization.** The content and scope of the data to be processed shall meet the declared processing purposes, and the personal data shall be adequate to the processing purposes.
- > **Data accuracy.** The Company takes appropriate measures to ensure immediate deletion or correction of personal data that is inaccurate with respect to its processing purposes.
- > **Storage period limit.** Personal data shall not be stored in a way that enables the identification of the personal data subject for longer than the period required to meet the purposes of the personal data processing, if no specific storage period is stipulated by federal law or a contract to which the personal data subject is a party, a beneficiary or a guarantor. When the processing purposes are achieved or when their achievement is no longer necessary, the processed personal data shall be destroyed or depersonalised unless otherwise provided by federal law.
- > **Confidentiality, integrity, availability.** Personal data shall be processed in a way that guarantees a reasonable level of data security, which implies the use of acceptable and adequate administrative and technical protection measures preventing unauthorized or unlawful personal data processing and unintentional data loss, corruption or destruction.
- > **Continuous efforts to increase employee awareness** on ensuring personal data security in the course of processing.
- > **Commitment to the continuous improvement** of the comprehensive information security system aimed at, inter alia, ensuring personal data security.

## PROCEDURE AND CONDITIONS OF PERSONAL DATA PROCESSING

### GROUNDS FOR PERSONAL DATA PROCESSING

The Company shall have the right to process personal data if one of the following grounds for processing is applicable:

- The personal data subject has provided their consent to personal data processing for one or more specific purposes.
- Personal data processing is required for purposes stipulated by law or an international treaty entered into by the Russian Federation, or in order to implement and comply with the functions, authority and responsibilities imposed on the operator by the Russian legislation.
- Personal data processing is required to execute a contract to which the personal data subject is a party, a beneficiary or a guarantor, and for the purposes of concluding a contract initiated by the personal data subject or a contract to which such a subject shall be a beneficiary or a guarantor.
- Processing is necessary to meet the requirements of European Union legislation or European Union member state legislation to which the personal data operator is subject.
- Personal data processing is required to protect the life, health or other vital interests of the personal data subject, if it is impossible to obtain consent to personal data processing from the subject.
- Personal data processing is required to exercise the legitimate interests of the operator or a third party, except for cases where such interests are overridden by the interests or fundamental rights and freedoms of the personal data subject.
- Personal data processing is required to execute a legal act or an act of another authority or official that is to be executed in line with the Russian legislation on enforcement proceedings.
- The personal data subject has allowed access to the processed personal data to an unlimited number of persons, or the data is processed following a request of the personal data subject (personal data made public by the personal data subject).
- The processed personal data is to be published or disclosed in line with federal law.

### A personal data subject has the right to the following:

- Demand that the Company correct, block, or destroy their personal data if it is incomplete, outdated, inaccurate, illegally acquired, or not required for the stated processing purposes and take any measures prescribed by law to protect their rights.
- Appeal against any action or inaction of the Company (as an operator) to the competent authority responsible for protecting the rights of the personal data subjects or through legal proceedings.
- Protect their rights and legitimate interests, including compensation of losses and/or non-pecuniary damage through legal proceedings.
- Obtain information related to the processing of their personal data.

### If personal data processing falls under GDPR, a personal data subject has the right to the following:

- **Access to personal data.** The subject has the right to request confirmation of the fact that their personal data has been processed. In case of such processing a personal data subject has the right to review the personal data processed as well as the information related to the purposes of such processing, categories of the processed data, actions performed with the data, the data recipients, guarantees in case of data transmission to third parties, the processing time, data sources, and the existence of a fully automated decision-making process. The subject also has the right to obtain a list of the personal data being processed.
- **Personal data correction.** The subject has the right to demand that their personal data be rectified if any inaccuracies in the data are identified. Taking into consideration the processing purposes, the subject has the right to introduce additional personal data, including through an additional statement.
- **Restricted personal data processing.** The subject has the right to initiate a restriction in the processing of all or part of their personal data (subject to the conditions stipulated by GDPR).
- **Personal data deletion.** The subject has the right to request deletion of all their personal data from the Company's systems and/or other available physical sources (subject to the conditions stipulated by GDPR).
- **Data transferability.** The subject has the right to request a structured, universal, and machine-readable list of their personal data provided to the Company for processing and to instruct the Company to transfer their data to a third party if the Company has the technical means to do so. In this case the Company bears no responsibility for the third parties' further actions with the personal data.
- **Objection against personal data processing.** The personal data subject has the right to object against the processing of all or part of their personal data for the purposes stated when providing the personal data to the Company, except for cases when the legal grounds for processing prevail over the interests, rights, and freedoms of the subject, or the processing is required for justification, filing or defence of a legal claim.
- **Filing a complaint with the national supervisory authority** at the place of permanent residency within the European Union if the Company violates their rights related to personal data processing in any way.

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