



## DIRECTIVE

### ON THE PERSONAL DATA PROCESSING POLICY OF LLC LSR

30 June 2017

*No. UK 01-09/19*

St Petersburg

Pursuant to Federal Law No. 152-FZ On Personal Data, dated 27 July 2006:

1. Approve the Personal Data Processing Policy of LLC LSR (Appendix 1; the “Policy”).
2. Approve the Personal Data Processing Consent Form for data submitted to LLC LSR by personal data subjects when filling in forms on LSR Group’s corporate website (Appendix 2).
3. The Executive Office of LLC LSR should:  
within five business days after this Directive is signed, but no later than 1 July 2017, publish the Policy on LSR Group’s corporate website  
within two business days after this Directive is signed, communicate it to the responsible officers and units as per the mailing list (Appendix 3).
4. I reserve the right to control the execution of this Directive.

CEO

Andrey Molchanov

## **THE PERSONAL DATA PROCESSING POLICY OF LLC LSR**

### **1. GENERAL PROVISIONS**

1.1. The Personal Data Processing Policy of LLC LSR (the “Policy”) is a mandatory internal regulation, a fundamental document containing the general goals, principles and norms of LLC LSR (the “Operator”) in the processing of personal data (“PD”).

1.2. The Policy is developed pursuant to Article 18.1 of Federal Law No. 152-FZ On Personal Data, dated 27 July 2006 (the “Federal Law”), to comply with the requirements of Russian law on PD processing and protection, and is aimed at protecting the human rights and freedoms of citizens, including the right to respect for private and family life, when the Operator processes their PD.

1.3. The relationship arising during the processing and protection of PD provided by the PD subject is subject to the Policy, the Operator’s internal regulations and Russian law on PD processing.

1.4. PD is processed by the Operator for the purposes consistent with Russian law and pursuing the Operator’s own legitimate interests if such processing does not violate PD subjects’ rights.

1.4.1. PD is processed for the following purposes:

- To inform the PD subject on LSR Group products, special offers, products in stock, other information, consultations, newsletters advertisements, including for concluding any further deals to the extent permitted by applicable Russian law
- Marketing and other research conducted by the Operator
- The Operator preparing and sending responses to PD subjects’ queries
- The Operator organising events involving PD subjects (excursions, shows, etc.)
- Fulfilling the Operator and LSR Group entities’ employer responsibilities as prescribed by the applicable law
- Fulfilling the Operator and LSR Group entities’ other responsibilities under commercial contracts and other agreements with PD subjects

1.4.2. The Operator processes PD of the following PD subjects:

- Current and potential counterparties of the Operator and LSR Group entities
- Individuals – representatives of current and potential counterparties of the Operator and LSR Group entities
- Current and previous employees of the Operator and LSR Group entities
- Other individuals and entities in cases prescribed by Russian law or the Operator’s internal regulations

1.4.3. The types of PD processed by the Operator are outlined in the relevant instruction of the Operator's CEO.

1.5. The legal basis for PD processing resides in:

- federal laws and regulations based thereon, which regulate the relationship arising from the activities of the Operator and LSR Group entities
- contracts between the Operator, LSR Group entities and PD subjects
- the personal data processing consent from the PD subject.

1.6. The Policy covers the relationship arising from the processing of PD obtained by the Operator both before and after its approval, unless its provisions cannot be applied to the relationship arising from the processing and protection of PD obtained by the Operator after its approval due to legal, organisational or other reasons.

## **2. TERMS OF PD PROCESSING AND USE BY THIRD PARTIES**

2.1. PD is processed as long as necessary for the purposes set out in the Policy and in any legitimate way, including in automated and non-automated information systems.

2.2. The Operator can transfer PD to authorised government bodies only on the grounds of and in the manner stipulated by Russian law.

2.3. By filling in and submitting the Form (feedback form, questionnaire, data provided when creating an account; the "Form"), that contains PD via the corporate website to the Operator, the PD subject agrees that:

- they provide accurate information about themselves; any other information is submitted by the PD subject at their own discretion
- the Operator may process PD, including PD transfer to third parties, particularly to LSR Group entities, contractors that provide services for the Operator's corporate website, and other entities and individuals that provide marketing and other services to the Operator, including for organising excursions and other events
- pursuant to Article 18, Part 1, of Federal Law No. 38-FZ On Advertising, dated 13 March 2006, they grant their consent to receive advertisements, including SMS messages, via electric communication networks, including by telephone, facsimile and mobile radio telephone
- they accept the legal validity of e-mails/e-mailed documents, including from the Operator
- they have the sole access to, and the sole right to, their e-mail account and/or mobile radio telephone communication device that has the address and/or number provided in the Form. Access is granted to the PD subject via a confidential password.

2.3.1. The Operator does not verify the accuracy of the provided data about the PD subject unless such verification is necessary to fulfil the Operator's responsibilities to them.

2.4. The Operator may transfer PD to third parties if:

- the PD subject has given consent to such a transfer,
- PD is transferred to third parties in the manner stipulated by Russian law.

2.5. In processing PD, the Operator is guided by applicable Russian law on PD and the Operator's internal regulations.

2.6. In processing PD, the Operator uses databases located in Russia.

### **3. FEEDBACK**

3.1. The Operator's contact details for PD subjects to address the Operator on matters related to their PD:

- E-mail: mail@lsrgroup.ru
- Postal address: 36 Kazanskaya St., Letter B, St Petersburg, Russian Federation, 190031
- Contact phone: +7 800 770 7577

3.2. By addressing the above contact details, the PD subject can obtain information related to the processing of their personal data by the Operator, including:

- confirmation of PD processing by the Operator
- legal grounds for and purposes of PD processing
- PD processing methods used by the Operator
- name and address of the Operator, information on individuals and entities (except for the Operator's employees) who have access to PD or to whom such PD may be disclosed under an agreement with the Operator or the Federal Law
- PD being processed and related to the relevant PD subject and their source unless the Federal Law establishes another procedure for disclosing such data
- timelines for PD processing, including PD storage
- the procedure for the PD subject to exercise their rights under the Federal Law
- information on the actual or proposed cross-border transfer of PD
- full name and address of the individual or entity processing PD on behalf of the Operator if such processing is or will be assigned to such individual or entity
- other information under the Federal Law or other federal laws.

3.3. The PD subject has the right to obtain information related to the processing of their PD, unless such right is restricted under federal laws. The PD subject has the right to demand that the Operator update, block or delete their PD if such PD is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the declared purposes of processing, as well as to take measures provided by law to protect their rights.

3.3.1. The Operator assumes the PD subject's consent that at their written request, a

notification will be sent/delivered to their e-mail addresses or places of residence specified in the Personal Data Processing Consent Form, or to their representative personally or at their place of residence.

3.3.2. The request to obtain information or delete PD should contain the number of the principal document identifying the PD subject or their representative, information on the date of issuing such document and the issuing authority, information confirming the PD subject's relationship to the Operator (agreement number and date, short title and/or other information), or information otherwise confirming the processing of PD by the Operator, the signature of the PD subject and/or their representative. The request can be made by sending a notice from the e-mail address indicated by the PD subject to the e-mail address of the Operator ([mail@lsrgroup.ru](mailto:mail@lsrgroup.ru)) or by sending a written request to the Operator by registered mail with a return receipt and a list of enclosures to the following address: 36 Kazanskaya St., Letter B, St Petersburg, Russian Federation, 190031

3.4. If the above information and processed PD were provided to the PD subject for review at their own request, the PD subject may re-contact the Operator or re-send the request for PD no earlier than thirty (30) days after the initial contact or the initial request.

#### **4. PD PROCESSING SECURITY**

4.1. In ensuring PD security when processing such PD, the Operator will focus on preventing unauthorised access to such data by third parties or wilful software, hardware or other attacks aimed at stealing, destroying (deleting) or corrupting PD during the processing.

4.2. The Operator will take the necessary and sufficient technical and organisational measures to ensure the security and protection of PD against unauthorised or accidental access, deletion, modification, blocking, copying, dissemination and other unlawful actions by third parties.

4.3. The Operator will not process PD for any purpose besides the stated purposes of its collection. Unless otherwise provided for by the Federal Law, once the Operator has finished processing PD, including once the purposes of its processing are achieved or there is no longer any need to achieve such purposes, PD processed by the Operator is to be deleted or anonymised.

4.4. PD processing must ensure the accuracy and sufficiency of PD and, where need be, its relevance with respect to the purposes of processing. The Operator will take the necessary measures to delete or update incomplete or inaccurate PD.

#### **5. FINAL PROVISIONS**

5.1. The Operator reserves the right to amend the Policy. The new version of the Policy becomes effective as soon as it is published on the corporate website of LSR Group unless the new version of the Policy provides otherwise.

**DATA PROCESSING CONSENT FORM**  
**for data submitted to LLC LSR by personal data subjects when filling in forms at**  
**LSR Group's corporate website**

I hereby confirm that I have read the Personal Data Processing Policy of LLC LSR (the "Policy") and accept the Policy's terms.

Pursuant to Article 9, Part 1, of Federal Law No. 152-FZ On Personal Data, dated 27 July 2006, I have decided to provide my personal data freely, of my own will and in my own interest and give LLC LSR. Management Company (INN 7838381332, registered address: 36 Kazanskaya St., Letter B, St Petersburg, 190031; the "Operator") my consent to the processing<sup>1</sup> of my personal data (full name, principal ID number, place of employment / name of the employing company, position/occupation, country of residence, e-mail, contact phone number).

My personal data may be processed with or without the use of personal data automated processing systems.

The purposes of providing and processing personal data are:

- receiving from the Operator information on LSR Group's products, special offers, products in stock, other information, consultations, newsletters, advertisements, including for concluding any further deals to the extent permitted by applicable Russian law
- marketing and other research conducted by the Operator; the Operator preparing and sending responses to my queries
- the Operator organising events involving me (excursions, shows, etc.).

Pursuant to Article 18, Part 1, of Federal Law No. 38-FZ On Advertising, dated 13 March 2006, I grant my consent to receive advertisements, including SMS messages, via electric communication networks, including by telephone, mobile radio telephone and facsimile.

This consent:

- comes into effect on the day of submitting my personal data to the Operator
- is effective until its withdrawal. I can withdraw this consent and/or unsubscribe from the newsletter from paragraph 5 of this Consent Form by sending a notice from the e-mail address indicated by me to the e-mail address of the Operator ([mail@lsrgroup.ru](mailto:mail@lsrgroup.ru)) or by sending a written request to the Operator by registered mail with a return receipt and a list of enclosures to the following address: 36 Kazanskaya St., Letter B, St Petersburg, 190031.

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<sup>1</sup>Personal data processing – any action (operation) or a set of actions (operations) with respect to personal data including the following: collecting, recording, systemising, gathering, storing, revising (updating, altering), extracting, using, transferring (sharing, providing, accessing), depersonalising, blocking, deleting and destroying, with or without the use of personal data automated processing systems.

Appendix 3  
to the Directive of the CEO of  
LLC LSR No. UK 01-09/19,  
dated 30 June 2017

## MAILING LIST

### RESPONSIBLE AND CONTROLLING OFFICERS:

1. T. Gulambarova – Head of the Executive Office of LLC LSR

### MANAGEMENT OF LLC LSR

2. First Deputy CEO
3. Executive Director
4. Deputy CEOs
5. Head of the Representative Office of LLC LSR in Moscow
6. Chief Financial Officer
7. Director for Legal Affairs
8. IT Director
9. Director for Economic Security
10. HR Director
11. Managing Director
12. Director for Information Policy and Corporate Communications
13. Director for Real Estate Sales
14. Director for Centralised Procurement
15. Advisers
16. Head of Business Management Department

### INTERNAL AUDIT SERVICE OF PJSC LSR GROUP

17. Director of the Service

### LSR GROUP'S BUSINESS UNITS AND ENTITIES

18. Business unit LSR Europe
19. Business unit LSR. Aggregates

20. Business unit LSR. Concrete
21. Business unit LSR. ZhBI – North-West
22. Business unit LSR. Tower Cranes
23. Business unit LSR. Real Estate – North-West
24. Business unit LSR. Real Estate – Moscow
25. Business unit LSR. Real Estate – Urals
26. Business unit LSR. Wall Materials
27. Business unit LSR. Construction – North-West
28. Business unit LSR. Construction – Moscow
29. Business unit LSR. Construction – Urals
30. Business unit LSR. Project Management
  
31. JSC A Plus Estate
32. JSC Industrial Leasing
33. LLC LSR. Real Estate
34. PJSC LSR Group