

Personal Data Processing Policy

1. General

This Personal Data Processing Policy is made in accordance with the requirements of Federal Law No. 152-FZ On Personal Data dated 27 July 2006 ("Personal Data Law") and sets forth the procedure for personal data processing and measures to ensure personal data security at CYBERSTEEL LLC ("Operator").

- 1.1. The Operator considers the observance of human and civil rights, including the right to the privacy of personal life, personal and family secrets, in the course of personal data processing as its key goal and a prerequisite to its operations.
- 1.2. This Operator's Personal Data Processing Policy ("Policy") shall be applicable to all data the Operator may collect about the users of the website <https://cybersteel.com>.

2. Terms and definitions

- 2.1. "Automated personal data processing" means personal data processing using computer technology.
- 2.2. "Blocking of personal data" means temporary suspension of personal data processing (except where processing is required to rectify personal data).
- 2.3. "Website" means a collection of graphical and information materials as well as computer programs and databases that provide access to such materials on the Internet at <https://cybersteel.com>.
- 2.4. "Personal data information system" means a collection of personal data stored in the databases as well as hardware and software used for the processing thereof.
- 2.5. "Personal data anonymisation" means actions that make it impossible, without the use of additional information, to identify personal data as related to a certain User or other data subject.
- 2.6. "Personal data processing" means any action (operation) or a set of actions (operations) performed on personal data with or without the use of automated technology, including collection, recording, systematisation, accumulation, storage, rectification (update, alteration), retrieval, use, transfer (distribution, granting access to, accessing), anonymisation, blocking, deletion and destruction of personal data.
- 2.7. "Operator" means a state or municipal authority, legal entity or individual that processes personal data or organises such processing, whether independently or jointly with other persons, and defines the purposes of personal data processing, the scope of personal data to be processed, and the actions (operations) performed on personal data.
- 2.8. "Personal data" means any information related directly or indirectly to a specific or identifiable User of the website <https://cybersteel.com>.
- 2.9. "Personal data permitted by the data subject for dissemination" means personal data with general access provided by the data subject by giving consent to the processing of personal data permitted by the data subject for dissemination in the manner prescribed by the Personal Data Law ("personal data permitted for dissemination").
- 2.10. "User" means any visitor of the website <https://cybersteel.com>.
- 2.11. "Granting access to personal data" means actions aimed at disclosing personal data to third party or a group of third parties.
- 2.12. "Personal data dissemination" means any actions aimed at disclosing personal data to an indefinite number of third parties (personal data transfer) or making personal data available to the public, including disclosure via mass media, publication in information and telecommunication networks or otherwise providing access thereto.
- 2.13. "Cross-border personal data transfer" means personal data transfer to a foreign state authority, a foreign individual or legal entity.
- 2.14. "Personal data destruction" means any actions to delete personal data in a personal data information system without a possibility of recovery and/or actions to physically destroy media containing the personal data.

3. Key rights and obligations of the Operator

- 3.1. The Operator may:
 - receive reliable information and/or documents containing personal data from the data subject;
 - continue to process personal data without the data subject's consent following its withdrawal if so permitted or required under the Personal Data Law;
 - at its discretion, determine the scope and list of measures necessary and sufficient to ensure the performance of obligations under the Personal Data Law and regulations promulgated thereunder, unless otherwise required by the Personal Data Law or other federal laws.
- 3.2. The Operator shall:
 - upon request of the data subject, provide them with information relating to the processing of their personal data;
 - arrange for the processing of personal data in accordance with the applicable laws of the Russian Federation;
 - respond to requests and inquiries from data subjects and their legal representatives in accordance with the Personal Data Law;

- upon request of a competent authority for the protection of data subjects' rights, provide it with the requested information within 30 days from the date of receipt of the relevant request;
- publish this Personal Data Processing Policy or otherwise provide unrestricted access thereto;
- assume legal, organisational, and technical measures to protect personal data from unauthorised or accidental access, deletion, blocking, copying, disclosure, or dissemination, as well as from any other wrongful acts;
- discontinue the transfer of personal data (dissemination, provision, accessing), stop processing and destroy personal data as and when required by the Personal Data Law;
- perform any other duties stipulated by the Personal Data Law.

4. Key rights and obligations of data subjects

4.1. Data subjects may:

- obtain information relating to the processing of their personal data, except as otherwise required by federal laws. The information shall be provided by the Operator to the data subject in an accessible form and shall contain no personal data relating to other data subjects, unless the disclosure of such personal data is legally justified. The list of information and the procedure for obtaining the same are set out in the Personal Data Law;
- request the Operator to update, block or destroy their personal data if such data are incomplete, out-of-date or inaccurate, or have been obtained illegally, or are not necessary for the stated purposes of processing, as well as take any lawful measures to protect their rights;
- require that their prior consent be obtained for the processing of personal data to promote goods, work and services in the market;
- withdraw their consent to the processing of personal data;
- appeal to a competent authority for the protection of data subjects' right or appeal in the court against any unlawful act or omission by the Operator in the course of processing of their personal data;
- exercise any other rights provided for by the laws of the Russian Federation.

4.2. Data subjects shall:

- provide their reliable personal data to the Operator;
- notify the Operator of any rectifications (updates, alterations) of their personal data.

4.3. Persons providing the Operator with unreliable data about themselves or with any data about other data subjects without their consent shall be held liable in accordance with the laws of the Russian Federation.

5. The Operator shall be entitled to process the following personal data of the User

5.1. Full name.

5.2. Email address.

5.3. Telephone numbers.

5.4. Year, month, date, and place of birth.

5.5. Personal data collected and anonymised on the website (including via cookie files) using web analytics services (Yandex Metrica, Google Analytics, etc.).

5.6. The above-mentioned data are hereinafter collectively referred to as "Personal Data".

5.7. The Operator shall not process any special categories of personal data relating to race, ethnic origin, political views, religious or philosophical beliefs or intimate life.

5.8. The processing of personal data permitted for dissemination and falling within the special categories of personal data listed in Part 1, Article 10 of the Personal Data Law shall be subject to the restrictions and conditions specified in Article 10.1 of the Personal Data Law.

5.9. The User's consent to the processing of personal data permitted for dissemination shall be given separately from any other consents to the processing of their personal data and shall be subject to conditions stipulated, in particular, in Article 10.1 of the Personal Data Law. The requirements for the content of such consent shall be established by the competent authority for the protection of data subjects' rights.

5.9.1 The User shall give their consent to the processing of personal data permitted for dissemination directly to the Operator.

5.9.2 The Operator shall, within three business days from the receipt of the said consent from the User, publish information about the processing terms and any restrictions and conditions applicable to the processing of personal data permitted for dissemination, by an indefinite number of persons.

5.9.3 Transfer (dissemination, provision, accessing) of personal data permitted by the data subject for dissemination may be discontinued at any time upon request of the data subject. Such request shall specify the data subject's surname, given name and patronymic/middle name (if any), contact details (telephone number, email address or mailing address) as well as the list of personal data to be no longer processed. The personal data specified in such request may be processed only by the Operator to which such request is sent.

5.9.4 The consent to the processing of personal data permitted for dissemination shall cease to be valid after the Operator receives the request specified in clause 5.9.3 of this Policy.

6. Principles of personal data processing

- 6.1. Personal data shall be processed on a lawful and fair basis.
- 6.2. Personal data processing shall be limited to the achievement of specific, predetermined, and lawful purposes. No personal data may be processed if they are incompatible with the purposes of personal data collection.
- 6.3. No databases may be integrated if they contain personal data intended for incompatible processing purposes.
- 6.4. Personal data processing shall be compatible with the processing purposes.
- 6.5. The content and scope of processed personal data shall be consistent with the stated purposes of processing. Processed personal data shall not be excessive in relation to the stated purposes of processing.
- 6.6. Processed personal data shall be accurate, adequate, and, where required, updated in relation to the purposes of personal data processing. The Operator shall take all the necessary actions and/or procure that such actions are taken to delete or rectify any inadequate or inaccurate data.
- 6.7. Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes of personal data processing unless the retention period is provided by federal laws or a contract to which the data subject is a party, beneficiary, or guarantor. Processed personal data shall be destroyed or anonymised after achieving the processing purposes or after such purposes become irrelevant, unless otherwise stipulated by federal laws.

7. Purposes of personal data processing

- 7.1. Purposes of User's personal data processing:
 - providing information to the User via email;
 - providing the User with access to services, information and/or materials at <https://cybersteel.com>.
- 7.2. The Operator may also notify the User of new products and services, special offers, and events. The User can unsubscribe from such notifications at any time by sending the Operator an email to info@cybersteel.com with the wording "Unsubscribe me from new products, services and events notifications".
- 7.3. Anonymised data of Users collected by web analytics services are used to analyse their activity on the website and improve its usability and content.

8. Legal grounds for personal data processing

- 8.1. Legal grounds for the processing of personal data by the Operator:
 - constituent documents of the Operator;
 - federal laws and other regulations on personal data protection;
 - The User's consent to the processing of their personal data, processing of personal data permitted for dissemination.
- 8.2. The Operator shall process the User's personal data only if the User fills in and/or submits them on their own via special forms at <https://cybersteel.com> or by email to the Operator. By filling in the relevant forms and/or submitting their personal data to the Operator, the User expresses their consent to this Policy.
- 8.3. The Operator shall be able to process the User's anonymised data, only if this option is enabled in the User's browser settings (cookies and JavaScript are enabled).
- 8.4. The data subject shall provide their personal data and give consent, acting freely, independently, and in their own interest.

9. Terms of personal data processing

- 9.1. Personal data shall be processed subject to consent of the data subject.
- 9.2. Personal data processing is required for the purposes of objectives under an international treaty of the Russian Federation or law, for the exercise of functions or powers, and for the performance of obligations provided by laws of the Russian Federation.
- 9.3. Personal data processing is required to deliver justice, enforce a judgement of any court, body or official, which judgement is to be enforced under Russian laws governing enforcement procedures.
- 9.4. Personal data processing is required for the purposes of a contract to which the data subject is a party, beneficiary or guarantor, or for entering into a contract initiated by them or a contract under which they will be a beneficiary or guarantor.
- 9.5. Personal data processing is required for the exercise of rights and legitimate interests of the operator or third parties, or for any public purpose provided that no rights or freedoms of the data subject are affected.
- 9.6. Personal data shall be processed when public access is provided by, or upon request of, the data subject ("publicly available personal data").
- 9.7. Personal data processing shall be carried out when such data is subject to publication or mandatory disclosure in accordance with federal laws.

10. Procedures for collection, storage, transfer and other forms of personal data processing

Security of personal data processed by the Operator shall be ensured by regulatory, organisational and technical measures, required for full compliance with the applicable laws on the protection of personal data.

10.1. The Operator shall protect personal data and make best efforts to prevent unauthorised access thereto.

10.2. The User's personal data may not, under any circumstances, be transferred to third parties unless so required by the applicable laws or a consent has been granted by the data subject to the Operator to transfer their data to a third party for performing obligations under a civil law contract.

10.3. Should any inaccuracies be detected in personal data, the User may update them on their own by giving a notice containing the wording "Personal data update" to the Operator's email info@cybersteel.com.

10.4. The processing period for personal data is limited by the achievement of purposes for which the personal data have been collected unless a different period is provided by a contract or the applicable laws. The User may at any time withdraw their consent to personal data processing by giving the Operator a notice with the wording "Withdrawal of consent for personal data processing" to the Operator's email info@cybersteel.com.

10.5. Any information collected by third-party services, including payment systems, communication channels, and other service providers, shall be stored and processed by the above-mentioned parties (Operators) in conformity with their User Agreement or Privacy Policy. The data subject and/or User shall read such documents in due time.

The Operator shall bear no responsibility for actions of third parties, including those service providers mentioned in this clause.

10.6. The restrictions imposed by a data subject on personal data transfer (except for granting access), as well as personal data processing or the terms of personal data processing (except for obtaining access) shall be void if personal data are processed in the government or public interest as defined by the laws of the Russian Federation.

10.7. When processing personal data, the Operator shall keep them confidential.

10.8. The Operator shall keep personal data in a form which permits identification of data subjects for no longer than is necessary for the purposes of personal data processing unless the retention period is provided by federal laws or a contract to which the data subject is a party, beneficiary, or guarantor.

10.9. The processing of personal data shall be terminated when the purposes of personal data processing are achieved, the data subject's consent expires or is revoked, or when unlawful processing of personal data is identified.

11. List of actions to be performed by the Operator with respect to received personal data

11.1. The actions taken by the Operator include collection, recording, systematisation, accumulation, storage, rectification (update, alteration), retrieval, use, transfer (distribution, granting access to, accessing), anonymisation, blocking, deletion and destruction of personal data.

11.2. The Operator may perform automated data processing with or without the receipt and/or transmission of the received information via information and telecommunication networks.

12. Cross-border transfers of personal data

12.1. Prior to the commencement of any cross-border transfer of personal data, the Operator shall make sure that the foreign country, where the personal data is intended to transfer to, provides reliable protection of the rights of data subjects.

12.2. Any cross-border transfer of personal data to foreign countries that do not meet the above requirements is subject to the written consent of the personal data subject to cross-border transfer of their personal data and/or to execution of an agreement to which the personal data subject is a party.

13. Confidentiality of personal data;

The Operator and other individuals / legal entities that have gained access to personal data may not disclose or disseminate personal data to third parties without consent of the data subject unless otherwise provided for by the federal laws.

14. Final provisions

14.1. The User can receive any clarifications on matters pertaining to the processing of their personal data by sending an inquiry to the Operator's email info@cybersteel.com.

14.2. This document will reflect any changes introduced by the Operator to the Personal Data Processing Policy. The Policy shall be valid for an unlimited period of time until replaced by a new version.

14.3. The current version of the Policy is publicly available online at https://cybersteel.com/pd_policy.pdf.