

Sodrugestvo Website Data Privacy Notice

I. INTRODUCTION

This policy describes the types of information Sodruestvo Group of Companies (“Sodruestvo”, the “Company,” “we,” “our,” or “us”) will collect from you or that you will provide when you visit the websites www.sodruestvo.com and/or www.sodruestvo.com/career (together, the “Website”) and our practices for collecting, using, maintaining, protecting, and disclosing that information. This policy does not apply to information collected by us offline or through any other means, including on any other website operated by the Company or a third party or through any application or content (including advertising) that may link to or be accessible from the Website.

The Company is committed to protecting your privacy. We provide this policy to explain the type of information we collect and to inform you of the specific practices and guidelines that protect the security and confidentiality of your personal data. Please read this policy carefully. If any term in this policy is unacceptable to you, please do not use the Website or provide any personal data. This policy may change from time to time (see Revisions to Our Data Protection Policy).

II. INFORMATION WE COLLECT ABOUT YOU AND HOW WE COLLECT IT

We collect several types of information from and about users of our Website, which will include information defined as personal data (“Personal Data”).

II. 1. Information You Give to Us

II. 1. 1. Visitors

The information we collect on or through our Website include:

- Information that you provide as a visitor by filling in forms on our Website. This includes information provided when we process and respond to your inquiries and requests in the feedback form. The types of data we collect include your name, email address and information related to your inquiries and requests.
- Information that you provide as an investor by filling in forms on our Website (if and where applicable). This includes information provided when we process and respond to your inquiries and requests. The types of data we collect include your name, email address, telephone number, country, and information related to your inquiries and requests.

II. 1. 2. Job Applicants

Once on the Sodruestvo Career page, you will need to send CV, the information we collect on or through our Website includes:

- Name
- Birth date
- Phone
- E-mail
- Your salary expectations
- Experience
- Education
- Additional information.

II. 2. Information We Collect About You

II. 2. 1. Visitors

As with many other websites, as you navigate through and interact with our Website, we use automatic data collection technologies to collect certain information about your browsing actions and patterns, including:

- Details of your visits to our Website, including resources that you access and use on our Website, traffic data, location data, logs, language, date and time of access, frequency, and other communication data.
- Information about your computer and internet connection, including your, operating system, host domain, and browser type.
- Details of referring websites (URL).

The information we collect automatically is statistical data that helps us improve our Website and deliver a better and more personalized service, including by enabling us to:

- Determine website traffic patterns.
- Count web visits.
- Determine traffic sources so we can measure and improve the performance of our site.
- Help us to know which pages and content are the most and least popular.

- Observe site search patterns to provide more intuitive navigation cues.
- Determine user frequency and time between user visits.

II. 2. 2. Job Applicants

As with many other websites, as you navigate through and interact with our Website, we use automatic data collection technologies to collect certain information about your browsing actions and patterns, including:

- Information about your computer and internet connection, including your host domain.
- Details of referring websites (URL).

The information we collect automatically is statistical data that helps us improve our Website and deliver a better and more personalized service, including by enabling us to:

- Determine website traffic patterns.
- Determine traffic sources so we can measure and improve the performance of our site.

II. 3. Cookies Used on This Website.

Our Website uses single-session (temporary) and multi-session (persistent) cookies. Temporary cookies last only as long as your web browser is open, and are used for technical purposes such as enabling better navigation on our Website. Once you close your browser, the cookie disappears. Persistent cookies are stored on your computer for longer periods and are used for purposes including tracking the number of unique visitors to our site and information such as the number of views a page gets, how much time a user spends on a page, and other pertinent web statistics.

Cookies, by themselves, will not be used by the Company to disclose your individual identity. This information identifies your browser to our servers when you visit the Website. If you want to disable the use of cookies or remove them at any time from your computer, you can disable or delete them using your browser (consult your browser's "Help" menu to learn how to delete cookies); however, you must enable cookies to access certain information on our Website.

III. WHY WE USE YOUR INFORMATION

Below is the information about why we process Personal Data collected about you as well as the corresponding legal basis. We process your information where the processing is based on:

III. 1. Consent, Legitimate Interest or Pre-contractual Obligation

III. 1. 1. Visitors

Purpose of processing	Legal basis
Responding to “Contact Us” forms	Legitimate interest to run Company’s business as appropriate

III. 1. 2. Job Applicants

Purpose of processing	Legal basis
Communicating with applicants and processing applications	As per labor law

III. 2. Legal Obligation

III. 2. 1. Visitors and Job Applicants

Purpose of processing	Legal basis
Compliance with legal obligations, regulatory investigations or litigation and protecting the Company against injury, theft, legal liability, fraud, abuse or other misconduct	Legal obligation

IV. DISCLOSURE OF YOUR INFORMATION

IV. 1. Visitors

We disclose aggregated information about our users, and information that does not identify any data subject, without restriction. Subject to applicable law and regulations, we disclose Personal Data that we collect or you provide as described in this policy:

- To any member of our group, our subsidiaries and affiliates.
- To contractors, service providers, and other third parties we use to support our business or in connection with the administration and support of the activities noted above and who are bound by contractual obligations to keep Personal Data confidential and use it only for the purposes for which we disclose it to them (e.g., database hosting providers, developers or consultants).
- To a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of the Company's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which Personal Data held by the Company about our Website users is among the assets transferred.
- If we are under a duty to disclose or share your Personal Data in order to comply with any legal obligation, or in order to enforce or apply our terms of use and other agreements, including for billing and collection purposes; or to protect the rights, property, or safety of the Company, our customers, or others.
- For other purposes only with your consent when required by applicable law and regulations.

IV. 2. Job Applicants

We disclose aggregated information about our users, and information that does not identify any data subject, without restriction. Subject to applicable law and regulations, we disclose Personal Data that we collect or you provide as described in this policy:

- To the HR department and Hiring Managers of any member of our group, our subsidiaries and affiliates to address and follow up with your job applications.

V. CROSS-BORDER TRANSFERS OF PERSONAL DATA

The data that we collect from you will be transferred to, and stored at, a destination outside the European Economic Area ("EEA"). It will also be processed by staff operating outside the EEA who work for us or other entities acting as data processors processing data on behalf of us. This includes staff engaged in, among other things, the fulfillment of your request or order and the provision of support services.

VI. DATA RETENTION

Unless otherwise required by applicable law, the Company will also erase Personal Data when it is no longer necessary in relation to the purposes for which it was collected or otherwise processed; when you withdraw your consent (where lawfulness of processing was based on your consent) and there is no other legal ground for the processing; when you object to the processing and there are no overriding legitimate grounds for the processing; when your Personal Data has been unlawfully processed; and when it is necessary to comply with legal obligations.

If you are a job applicant, your profile will automatically be deleted three years after its creation, unless Sodrugestvo offers or is about to offer you a job.

VII. CHOICES ABOUT HOW WE USE AND DISCLOSE YOUR INFORMATION

We strive to provide you with choices regarding the Personal Data you provide to us. We have created mechanisms to provide you with the following control over your information:

- **Cookie settings.** You can set your browser to refuse all or some browser cookies, or to alert you when cookies are being sent. If you disable or refuse cookies, please note that some parts of this site will then be inaccessible or not function properly.

VIII. YOUR RIGHTS WITH REGARD TO YOUR PERSONAL DATA

We remind you that you may at any time exercise the following rights:

- The right to request access to your Personal Data, which includes the right to obtain confirmation from us as to whether or not Personal Data concerning you is being processed, and where that is the case, access to the Personal Data and information related to how it is processed.
- The right to rectification or erasure of your Personal Data, which includes the right to have incomplete Personal Data completed, including by means of providing a supplementary statement, certain rights to request us to erase your Personal Data without undue delay.
- The right to restrict to processing concerning your Personal Data, which includes restricting us from continuing to process your Personal Data under certain circumstances (e.g., where you contest the accuracy of your Personal Data, processing is unlawful, your Personal Data is no longer needed for the purposes of processing, or you have otherwise objected to processing related to automated individual decision-making).
- **The right to object to processing concerning your Personal Data, where your Personal Data is processed for direct marketing purposes, where processing is necessary for the performance of a task carried out in the public interest, or where processing is necessary for the purposes of the legitimate interests pursued by the Company or a third party, unless we demonstrate compelling legitimate grounds for the processing which override such interests.**
- The right to data portability, which includes certain rights to have your Personal Data transmitted from us to another controller.
- Where data processing is based on your consent, the right to withdraw consent at any time.
- The right to lodge a complaint with a supervisory authority.

If you are a job applicant and want to view, modify or delete any of your Personal Data, please submit a written request.

Any requests related to the above rights may be made by sending an email to privacy@sodru.com or info@sodrugestvo.com.

IX. DATA SECURITY

We have implemented measures designed to secure your Personal Data from accidental loss and from unauthorized access, use, alteration, and disclosure:

IX. 1. Visitors

- Identity and access management (IAM),

- Passwords rotation,
- Access control monitoring through log management,
- Real-time threat management and response, including escalations where required, and
- Deployment of leading firewall technologies and third-party DDoS protection for malicious activities.

IX. 2. Job Applicants

- Security and access managed and administered centrally through role-based permissions (i.e., access restricted to recruiting teams and hiring managers involved).

Personal Data provided to us in accordance with this policy will be encrypted in transit.

X. THIRD-PARTY WEBSITES

Our Website may contain links or references to other websites outside of our control. Please be aware that this policy does not apply to these websites. The Company encourages you to read the privacy statements and terms and conditions of linked or referenced websites you enter. These third-party websites will send their own cookies and other tracking devices to you, log your IP address, and otherwise collect data or solicit Personal Data. The Company does not control and is not responsible for what third parties do in connection with their websites, or how they handle your Personal Data. Please exercise caution and consult the data protection policies posted on each third-party website for further information.

XI. CHILDREN UNDER THE AGE OF 16

Our Website is not intended for children under 16 years of age, and the Company does not knowingly collect or use any Personal Data from children under the age of 16. No one under the age of 16 may provide any information to or on the Website. If we learn we have collected or received Personal Data from a child under the age of 16, we will delete that information. If you believe we might have any information from or about a child under the age of 16, please contact privacy@sodru.com or info@sodrugestvo.com.

XII. REVISIONS TO OUR DATA PROTECTION POLICY

We reserve the right to change this policy at any time. Any changes we make will be posted on this page. If we make material changes to how we treat your Personal Data, we will notify you through a notice on



the Website home page via a separate banner related to this Website Data Protection Policy. The date this policy was last revised is identified at the top of the page.