

APPROVED
General Director of AIR LIQUIDE LLC,
Air Liquide Kstovo LLC

V. A. Budygin

APPROVED
General Director of Logika JSC,
Air Liquide Severstal JSC

D. N. Golubev

APPROVED
General Director of Air Liquide Kuzbass LLC,
Air Liquid Balakovo LLC

S. V. Barkov

APPROVED
General Director of Air Liquide Lipetsk LLC,
Air Liquide Alabuga LLC

E. M. Shcherbinina

APPROVED
General Director of AIR LIQUIDE RYAZAN LLC,
Sever Liquid Gas LLC

O. V. Borisova

PERSONAL DATA PROCESSING POLICY

Moscow
08 April 2024

PERSONAL DATA PROCESSING POLICY OF
AIR LIQUIDE LLC, Air Liquide Kstovo LLC, Sever Liquid Gas LLC, Logika JSC, Air Liquide
Severstal JSC, Air Liquide Kuzbass LLC, Air Liquide Balakovo LLC, Air Liquide Lipetsk LLC,
Air Liquide Alabuga LLC, AIR LIQUIDE RYAZAN LLC

1. GENERAL PROVISIONS

- 1.1. This Personal Data Processing Policy (hereinafter referred to as the "Policy") of Limited Liability Company "AIR LIQUIDE", Limited Liability Company "Air Liquide Kstovo", Limited Liability Company "Sever Liquid Gas", Joint-Stock Company "Logika", Joint-Stock Company "Air Liquide Severstal", Limited Liability Company "Air Liquide Kuzbass", Limited Liability Company " Air Liquide Balakovo", Limited Liability Company "Air Liquide Lipetsk", Limited Liability Company "Air Liquide Alabuga", Limited Liability Company " AIR LIQUIDE RYAZAN" (hereinafter collectively and separately – the "Company") was developed in order to implement the requirements of the legislation in the field of processing and protection of personal data and is aimed at ensuring protection of human and civil rights and freedoms when processing their personal data in the Company, including protection of the rights to privacy, personal and family secrets.
- 1.2. The Policy is developed in accordance with Article 18.1 of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data " (hereinafter — the Law "On Personal Data").
- 1.3. The Policy is a fundamental internal document of the Company in the field of processing and protection of personal data by the Company and defines the key directions of the Company's activities in the field of processing and protection of personal data.
- 1.4. The Policy is binding on all employees of the Company who process personal data. Failure to comply with the Policy may result in disciplinary, civil, administrative and criminal liability in accordance with the legislation of the Russian Federation.
- 1.5. All employees of the Company must be familiarized with this Policy against signature.
- 1.6. In order to implement the requirements of Part 2 of Article 18.1 of the Law "On Personal Data", the Company provides unlimited access to this Policy by publishing it on its official website www.air-lead.ru.
- 1.7. As a follow-up to and in compliance with the Law "On Personal Data" and this Policy, the Company develops and issues local acts on personal data processing, as well as local acts aimed at preventing and detecting violations of the legislation of the Russian Federation in the field of personal data protection and processing, and eliminating the consequences of such violations.

2. BASIC CONCEPTS

The Policy uses the following basic concepts:

- 2.1. **Personal data** — any information related directly or indirectly to a specific or identifiable natural person (subject of personal data).
- 2.2. **Processing of personal data** — any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, or destruction of personal data.
- 2.3. **Automated processing of personal data** — processing of personal data using computer technology.
- 2.4. **Non-automated processing of personal data** is the implementation of such actions with personal data as the use, clarification, distribution, destruction of personal data in relation to each subject with the direct participation of a person.
- 2.5. **Distribution of personal data** — actions aimed at disclosing personal data to an indefinite group of persons.
- 2.6. **Provision of personal data** — actions aimed at disclosing personal data to a certain person (group of persons).
- 2.7. **Blocking of personal data** — temporary termination of the processing of personal data (except in cases where the processing is necessary to clarify personal data).
- 2.8. **Destruction of personal data** — actions that make it impossible to restore the content of personal data in the personal data information system and (or) as a result of which the material carriers of personal data are destroyed.
- 2.9. **Depersonalization of personal data** — actions that make it impossible to determine whether personal data belongs to a specific personal data subject without using additional information.

2.10. **Personal data information system** — a set of personal data contained in databases and information technologies and technical means that ensure their processing.

3. LEGAL GROUNDS AND PURPOSES OF PERSONAL DATA PROCESSING. CATEGORIES OF PERSONAL DATA SUBJECTS.

3.1. The legal basis for processing personal data is:

- a set of legal acts pursuant to which and in accordance with which the operator processes personal data: The Constitution of the Russian Federation; Part one of the Civil Code of the Russian Federation part one dated November 30, 1994 N 51-FZ, part two dated January 26, 1996 N 14-FZ, part three dated November 26, 2001 N 146-Federal Law and part four dated December 18, 2006 No. 230-FZ; Federal Law No. 152-FZ dated 27.07.2006 "On Personal Data"; Labor Code of the Russian Federation No. 197-FZ of December 30, 2001; Federal Law No. 59-FZ dated 02.05.2006 "On the Procedure for Considering Appeals from Citizens of the Russian Federation"; Federal Law No. 14-FZ dated 02.02.1998 "On Limited Liability Companies"; Tax Code of the Russian Federation Part One dated July 31, 1998 N 146-FZ and Part Two dated August 5, 2000 N 117-Federal Law No. 165-FZ dated July 16, 1999 "On the Basics of Compulsory Social Insurance"; Federal Law No. 125-FZ dated July 24, 1998 "On Compulsory Social Insurance against Industrial Accidents and Occupational Diseases"; Federal Law No. 167-FZ dated December 15, 2001 "On Compulsory Pension Insurance in the Russian Federation";
- constituent documents of the Company;
- contracts concluded between the Company and third parties and/or with the subject of personal data;
- consent to the processing of personal data provided in accordance with the requirements of the applicable legislation, including, without limitation, in cases not expressly provided for by the legislation of the Russian Federation, but corresponding to the goals of the Company's activities.

3.2. The processing of personal data is carried out by the Company for the purposes of operating activities, including, without limitation, for the purposes of: (1) entering into contracts and cooperation with legal entities and individuals, including, without limitation, entering into contracts and cooperation with distributors and buyers of products, as well as entering into contracts aimed at obtaining goods, works, services, etc. by the Company (2) cooperation and interaction with public authorities within the framework of the Company's business activities, (3) cooperation with non-profit organizations within the framework of the Company's business activities.

In addition, the processing of personal data is carried out by the Company in order to fulfill all the obligations of the employer stipulated by the legislation, provided for by labor legislation (including, without limitation, Article 22 of the Labor Code of the Russian Federation), applicable tax legislation and legislation on social guarantees, in order to comply with the norms of legislation on mandatory pension and social insurance, and personnel records, as well as ensuring the rights of the employee as a subject of personal data; for the purpose of training, education, development and professional development of employees.

Personal data is also processed by the Company in order to comply with the applicable legislation of the Russian Federation regarding the Company's licensed activities.

3.3. The Company processes personal data of the following categories of personal data subjects:

- Employees of the Company (former and current);
- Family members of the Company's employees;
- Candidates for employment in the Company;
- Individuals who are performers under civil contracts;
- Employees of third parties and contractors that carry out their activities, including on the Company's territory, in accordance with the agreements concluded with the Company;
- Employees, shareholders, owners, members of management bodies and contact persons of current and potential counterparties and clients of the Company, as well as their family members.

4. GENERAL PRINCIPLES OF PERSONAL DATA PROCESSING IN THE COMPANY

When processing personal data, the Company guarantees and ensures:

- transparency of personal data processing by properly informing the subjects;

- the legality of the methods and methods used for processing personal data;
- compliance with the rights of personal data subjects during the processing of personal data, including automated processing of personal data;
- proper protection of personal data from unauthorized or accidental access to it by third parties, from software, technical and other influences aimed at stealing personal data, destroying it, changing it, distributing it, as well as from other illegal actions in the field of personal data;
- limiting the processing of personal data to the achievement of specific, pre-defined and legitimate purposes, preventing the processing of personal data that is incompatible with the purposes of their collection;
- compliance of the content and scope of personal data with the stated purposes of personal data processing;
- prevention of combining databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other;
- the accuracy of personal data and their sufficiency for the purposes of processing, and, if necessary, their relevance in relation to the purposes of processing, preventing the processing of personal data that is redundant in relation to the stated purposes of their processing;
- storage of personal data in a form that makes it possible to identify the personal data subject, no longer than the purposes of processing personal data require, unless the storage period is established by the relevant law of the Russian Federation or an agreement to which the personal data subject is a party, beneficiary or guarantor;
- destruction or depersonalization of personal data upon achievement of the purposes of their processing, unless otherwise provided by a federal law of the Russian Federation;
- confidentiality and security of the processed personal data;
- continuity of internal control over the compliance of personal data processing with legal requirements.

When processing personal data, the Company assumes that the subjects of personal data provide the Company with accurate and reliable information, including personal data, and promptly notify the Company of changes in personal data.

If the Company receives Personal Data from third parties (including as part of the execution of all and any contracts of the Company), the Company assumes that such third parties fully comply with the legislation on personal data protection when processing personal data of the Company and that they have notified the subjects of personal data in advance of such processing. transfer and received their written consent.

5. ACCESS TO PROCESSED PERSONAL DATA

5.1. Access of the Company's employees to the personal data processed by the Company is provided in strict accordance with their official duties, the requirements of the Company's internal documents and the requirements of the applicable legislation. Access is granted to the Company's employees, persons who are assigned by the Company to process personal data in accordance with the concluded agreement, as well as to the persons themselves whose personal data is subject to processing.

5.2. Employees of the Company authorized to process personal data must be familiar with the Company's documents establishing the procedure for processing personal data, including documents establishing the rights and obligations of specific employees, against their signature.

5.3. Access of a personal data subject to his / her personal data processed by the Company is carried out in accordance with the requirements of the legislation of the Russian Federation, the procedure for such access is established by local acts of the Company.

6. REQUIREMENTS FOR PERSONAL DATA PROTECTION IMPLEMENTED BY THE COMPANY

6.1. When processing personal data, the Company takes legal, organizational and technical measures (or ensures their adoption) necessary and sufficient to ensure the fulfillment of obligations imposed by the Law "On Personal Data" and regulatory legal acts adopted in accordance with it, in order to protect personal data from unauthorized or accidental access to them, destruction, modification protection against blocking, copying, providing, distributing personal data, as well as other illegal actions in relation to personal data.

6.2. The composition of the measures specified in clause 6.1 of the Policy, including their content and the choice of personal data protection tools, is determined, and internal regulatory documents on the processing and protection of personal data are approved (published) by the Company based on the

requirements of regulatory legal acts of the Russian Federation concerning the processing and protection of personal data.

6.3. The Company appoints a person responsible for organizing the processing of personal data.

6.4. When collecting personal data, the Company ensures recording, systematization, accumulation, storage, clarification (updating, modification), extraction of personal data of citizens of the Russian Federation using databases located on the territory of the Russian Federation, except for cases when otherwise permitted by the Law "On Personal Data".

6.5. Processing of personal data is carried out by the Company with the consent of the subjects of personal data, except for cases when the legislation of the Russian Federation allows the processing of personal data without obtaining the consent of the subjects of personal data.

6.6. The Company familiarizes its employees with the provisions of the Law "On Personal Data", including the requirements for the protection of personal data, this Policy and other local acts of the Company on the processing of personal data, and training of employees directly involved in the processing of personal data on the processing and protection of personal data.

6.7. The Company approves internal documents related to the processing and protection of personal data, including those establishing procedures aimed at preventing and detecting violations of the law, eliminating such violations and their consequences.

6.8. The Company exercises internal control and verifies compliance of personal data processing carried out by the Company with the Law "On Personal Data" and regulatory legal acts adopted in accordance with it, requirements for personal data protection, this Policy and local acts of the Company.

6.9. The Company evaluates the harm that may be caused to personal data subjects in the event of a violation of the Law "On Personal Data", determines the ratio of this harm and the measures taken by the Company aimed at ensuring the fulfillment of obligations stipulated by the Law "On Personal Data".

6.10. Ensuring the security of personal data in the Company during their processing is achieved, in particular, by:

- identification of threats to the security of personal data when processing them in personal data information systems. The type of actual threats to personal data security and the required level of personal data security are determined in accordance with the requirements of the legislation and taking into account the assessment of possible harm;

- determining, in accordance with the established procedure, the composition and content of measures to ensure the security of personal data, the choice of information security tools. If it is impossible to implement certain selected measures to ensure the security of personal data technically, as well as taking into account economic feasibility, the Company may develop other (compensating) measures aimed at neutralizing current threats to the security of personal data. In this case, the Company, in the course of developing a personal data protection system, justifies the application of compensatory measures to ensure the security of personal data;

- application of organizational and technical measures to ensure the security of personal data necessary to meet the requirements for the protection of personal data that provide certain levels of personal data security, including the use of information security tools that have passed the conformity assessment procedure, when the use of such tools is necessary to neutralize current threats.

6.11. The Company also performs:

- assessment of the effectiveness of measures taken to ensure the security of personal data prior to commissioning of the personal data information system;

- accounting of machine-generated personal data carriers, ensuring their safety;

- detecting the facts of unauthorized access to personal data and taking appropriate measures, including measures to detect, prevent and eliminate the consequences of computer attacks on personal data information systems;

- recovery of personal data modified or destroyed as a result of unauthorized access to them;

- establishing rules for access to the processed personal data, as well as ensuring registration and accounting of all actions performed with personal data in the personal data information system;

- organization of a security regime for the premises where the personal data information system is located, which prevents the possibility of uncontrolled entry or stay in these premises by persons who do not have the right of access to these premises;

- control over the measures taken to ensure the security of personal data, the level of security of personal data information systems.

6.12. Ensuring the protection of personal data in the Company during their non-automated processing is achieved, inter alia, by:

- separation of personal data from other information, in particular, by recording them on separate material carriers of personal data, in special sections or in the fields of forms (forms);
- prevention of fixing on one material carrier of personal data, the purposes of processing of which are obviously incompatible, use of separate material carriers for processing of each category of personal data;
- taking measures to ensure separate processing of personal data in case of incompatibility of the purposes of processing personal data recorded on the same physical carrier, if the physical carrier does not allow the processing of personal data separately from other personal data recorded on the same carrier;
- compliance with other requirements imposed by regulatory acts of the Russian Federation on the procedure for non-automated processing of personal data.

7. FINAL PROVISIONS

7.1. This Policy comes into force from the moment of its approval by the General Director of the Company. The Policy applies to the procedure for processing and protecting personal data received by the Company both before and after the approval of the Policy by the General Director, except for cases when the Policy cannot be extended to relations related to the processing and protection of personal data received before its approval, for legal, organizational or other reasons.

7.2. Control over compliance with the requirements of this Policy is carried out by the person responsible for organizing the processing of personal data in the Company.

7.3. This Policy is subject to revision in the event of new legislative acts and special regulatory documents on the processing and protection of personal data. If some parts of this Policy have not been revised in accordance with the requirements of the applicable legislation, the Company is guided by the requirements of the applicable legislation.