APPROVED BY

R.A. Almazov
General Director
DLL Leasing LLC

signature printed name

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DATA PROTECTION AND PROCESSING POLICY

1. General

1.1. This Data Protection and Processing Policy (hereinafter referred to as the **"Policy"**) of the personal data operator, De Lage Landen Leasing Limited Liability Company (hereinafter referred to as the **"Company"**), located at 10 Butyrsky Val, floor 3, offices 60-89, Moscow, 125047, Russian Federation, outlines fundamental principles, procedures and terms and conditions of personal data processing, requirements for personal data protection and fundamental rules and obligations of data subjects and the personal data operator.

1.2. This Policy represents the primary local regulation of the Company with regard to personal data protection and processing requirements.

1.3. The Company provides unrestricted access to this Policy by publishing it on the Company's website.

2. Data Processing Principles

2.1. The Company processes personal data in accordance with the following principles:

- The purposes and means of personal data processing should be lawful and reasonable;
- Personal data processing should be limited to achieving specific predefined lawful purposes;
- Joint processing of databases containing personal data for the purposes not compatible with each other should not be allowed;
- The scope and content of the personal data processed should match the purposes of the data processing;
- Processing of personal data for the purposes other than the purposes of the data collection should not be allowed;
- Personal data should be accurate, sufficient and up-to-date, if applicable, for the purposes of personal data processing;

- Personal data can be stored in the form that allows identification of the data subject only for the period required for the purposes of personal data processing.

3. Purposes of Personal Data Processing

3.1. The Company will process personal data for the following purposes:

- To exercise powers and perform duties and obligations imposed on the Company by the Russian laws and international treaties of the Russian Federation;
- To exercise rights and perform obligations of the parties to an employment contract in accordance with labour laws;
- To ensure communication in connection with professional and business activities within the Company;
- To establish and implement internal corporate business processes within the Group;
- To assist with employment and to consider the possibility of employment;
- To provide allowances, benefits and compensations;
- To ensure interactions within the Group;
- To ensure approval, execution and performance of contracts and other transactions.

4. Legal Basis for Data Processing

4.1. Personal data are processed in accordance with laws and regulations, including (but not limited to):

- The Civil Code of the Russian Federation;
- The Labour Code of the Russian Federation;
- The Tax Code of the Russian Federation;
- Federal Law No. 167-FZ On Compulsory Pension Insurance in the Russian Federation dated December 15, 2001;
- Federal Law No. 125-FZ On Compulsory Social Insurance Against Workplace Accidents and Occupational Diseases dated July 24, 1998;
- Federal Law No. 255-FZ On Compulsory Social Insurance for Temporary Disability and Motherhood dated December 29, 2006;
- Federal Law No. 115-FZ On the Legal Status of Foreign Nationals in the Russian Federation dated July 25, 2002;
- Federal Law No. 109-FZ On Migration Registration of Foreign Nationals and Stateless Persons in the Russian Federation dated July 18, 2006;

- Federal Law No. 63-FZ On Digital Signature dated April 6, 2011;
- Federal Law No. 27-FZ On Individual (Personified) Accounting in the Compulsory Pension Insurance System dated April 1, 1996;
- Federal Law No. 53-FZ On Duty of Service and Military Service dated March 28, 1998;
- Fundamental Principles of Legislation of the Russian Federation on the Notariat No. 4462-1 es dated February 11, 1993;
- Law of the Russian Federation No. 1032-1 On Employment of the Population of the Russian Federation dated April 19, 1991;
- Federal Law No. 426-FZ On Special Assessment of Working Conditions dated December 28, 2013;
- Federal Law No. 38-FZ On Advertising dated March 13, 2006;
- Federal Law No. 164-FZ On Finance Lease dated October 29, 1998;
- Order of the Russian Federal Financial Monitoring Service (Rosfinmonitoring) No. 366 On Approval of the Requirements for Identification of Customers, Customers' Representatives, Beneficiaries and Beneficial Owners, Including Taking into Account the Level of Risk of Transactions for the Purposes of Money-Laundering and Financing of Terrorism dated November 22, 2018;
- Other laws and regulations of the Russian Federation that govern personal data processing;
- Articles of Association of the Company;
- Contracts and agreements entered into by the Company and its contractors;
- Contracts and agreements entered into with data subjects;
- Consents of data subjects.

5. Personal Data Processed

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

- Employees;
- Job candidates;
- Employees' relatives;
- Employees of the Group;
- Members of the management of the Company, shareholders and beneficiaries of the Company;

- Representatives of the customers (legal entities, entrepreneurs, farming businesses, including their representatives and employees, members of the management, beneficiaries and beneficial owners, guarantors, pledgors);
- Representatives of the contractors (legal entities, entrepreneurs, including their representatives and employees).

5.2. The scope and content of processed personal data of each data subject category shall be limited to the achievement of certain purposes of their processing and ensuring the Company is able to exercise its rights and perform its obligations and the rights and obligations of the respective data subject.

6. Data Processing Procedures, Terms and Conditions

6.1. The Company processes personal data by collecting, recording, classifying, accumulating, storing, correcting (updating, modifying), extracting, using, transferring (distributing, providing access to), blocking, removing and destroying personal data.

6.2. Personal data are processed through mixed processing (both automated and manual), including via the internal corporate network and the Internet.

6.3. The data subject is a direct source of all personal information and data. Unless otherwise stipulated by the laws of the Russian Federation, the Company is entitled to receive personal data of a data subject from third parties; however, the data subject should be notified thereof.

6.4. The Company may transfer personal data of data subjects to third parties, including cross-border data transfers to territories of other countries, including those that do not provide adequate protection of data subject's rights, provided it complies with the requirements of the laws of the Russian Federation.

6.5. The Company is entitled to assign processing of personal data to another entity with the consent of the respective data subject, unless otherwise stipulated by the federal laws, based on an agreement entered into with such entity (Data Processing Agreement). The appointed personal data processor shall comply with the principles and rules of personal data processing stipulated by the laws of the Russian Federation.

6.6. The Company shall specify in the Data Processing Agreement the purposes of processing and the list of actions (operations) with personal data that can be carried out by the appointed data processor, its obligations to ensure personal data confidentiality and security while processing and requirements regarding protection of processed personal data in accordance with the laws of the Russian Federation.

6.7. In processing personal data, the Company will comply with requirements that ensure integrity and confidentiality of personal data.

6.8. The Company will take all necessary technical and organisational steps as stipulated by the data protection laws of the Russian Federation to ensure personal data are protected from unauthorised access, change, disclosure or destruction.

6.9. The Company's employees and other persons having access to personal data shall undertake to ensure confidentiality of personal data being processed.

6.10. Personal data are stored in the form that allows identification of a data subject but only for the period required for the purposes of personal data processing, unless another term is stipulated by the laws of the Russian Federation or an agreement, under which the respective data subject is acting as a party, beneficiary or guarantor.

6.11. Personal data shall be destroyed after the purposes of processing have been achieved, achievement of the purposes of processing is no longer needed or at the end of the term of personal data storage stipulated by the federal laws or an agreement, under which the respective data subject is acting as a party, beneficiary or guarantor.

7. Updating, Correcting and Destroying Personal Data

7.1. The Company shall take all reasonable steps to maintain accuracy and to update personal data processed and to remove them if such data are out-of-date, inaccurate or excessive or when the purposes of their processing have been achieved.

7.2. If the Company becomes aware of inaccuracies in or unlawful processing of personal data, it shall update the data or stop the processing.

7.3. The Company shall stop personal data processing within the periods and according to the procedures specified below (unless otherwise is stipulated by the laws of the Russian Federation):

- If the Company becomes aware of any unlawful operations with personal data, the Company shall correct the violations identified within three business days from the date it became aware thereof. If it is unable to rectify the violations, the Company shall, within ten business days from the date it became aware of such unlawful operations with personal data, destroy the personal data in question. The Company shall notify the data subject or its official representative about the elimination of the detected violations or about the destruction of personal data, and if an application or request has been filed to a competent authority for protection of data subject rights, the Company shall also notify such authority;
- When the purposes of personal data processing have been achieved, the Company shall stop personal data processing and destroy the corresponding personal data within the period not exceeding thirty business days from the date of achievement of the purposes of personal data processing;
- If a data subject withdraws their consent for processing their personal data, the Company shall stop processing and destroy their personal data (except for any personal data that shall be stored in accordance with the applicable laws) within the period not exceeding thirty business days from the date of the withdrawal.

7.4. If it is not possible to destroy any personal data within the specified periods, the Company shall block or ensure blocking of access to the personal data in question and then

ensure their destruction within the period not exceeding six months, unless otherwise specified by the laws of the Russian Federation.

7.5. Personal data shall be destroyed in such ways as to exclude any further processing of such personal data.

8. Rights and Obligations of Data Subjects

8.1. A data subject is entitled to request information regarding processing of his/her personal data by the Company, including:

- Confirmation of the fact of personal data processing;
- Legal basis and purposes of personal data processing;
- Purposes and methods of personal data processing applied by the Company;
- Name and location of the Company, information about any entities (except for the Company's employees) that can access their personal data or to whom the personal data can be disclosed based on an agreement with the Company or the federal laws;
- The list of processed personal data of the data subject and the source of their collection, unless another procedure of disclosing such data is stipulated by the federal laws;
- Terms of personal data processing, including the term of storing personal data;
- The procedure for a data subject to exercise his/her rights stipulated by the data protection laws;
- Information about any actual or potential cross-border transfers of personal data;
- Name and address of an individual or entity that processes personal data on behalf of the Company, if the processing has been or will be assigned to such person or entity;
- Other information stipulated by the data protection laws.

8.2. A data subject is entitled to request the Company to update, block or destroy his/her personal data if the personal data are incomplete, outdated, inaccurate, collected unlawfully or are not required for the declared processing purposes and to take any steps stipulated by laws to protect his/her rights.

8.3. If a data subject has any reasons to believe that the Company processes their personal data in violation of the requirements of any laws, the data subject is entitled to apply to a competent authority for protection of data subject rights or to file a court claim in connection with such actions or omissions of the Company.

8.4. The data subject's right to access his/her personal data can be restricted in accordance with the federal laws of the Russian Federation.

8.5. The data subject shall:

- Provide only true personal data to the Company;
- Timely inform the Company of any changes and amendments to his/her personal data;
- Exercise his/her rights in accordance with laws, regulations and local policies of the Company regarding personal data protection and processing;
- Perform any other obligations stipulated by laws, regulations and local policies of the Company regarding personal data protection and processing;

9. Rights and Obligations of the Company

9.1. When processing any personal data, the Company is entitled to:

- Determine the rules of data processing within the Company, amend and supplement any local policies, at its own discretion but in compliance with the laws develop and use forms of documents required to comply with the obligations of a controller and/or processor of personal data;
- Exercise any other rights stipulated by laws, regulations and local policies of the Company regarding personal data protection and processing;

9.2. When processing any personal data, the Company shall:

- Ensure that personal data are processed only for the purposes for which they were collected;
- Obtain consent from a data subject for processing his/her personal data, including in writing, when required by the laws;
- Protect personal data from unlawful use or loss;
- Perform any other obligations stipulated by the laws of the Russian Federation and local policies of the Company regarding personal data protection and processing;

10. Replying to Data Subjects Requests

10.1. The Company will reply to data subject requests of information related to processing of his/her personal data based on a respective written request from the data subject.

10.2. Data subjects may file their requests about personal data processing to the following Company's address;

- 10 Butyrsky Val, floor 3, offices 60-89, Moscow, 125047.