POLICY
ON PERSONAL DATA PROCESSING
OF KONTUR JSC

1. GENERAL PROVISIONS

1.1 This document defines the policy of Kontur JSC (hereinafter – "Kontur JSC", the "Operator") with respect to personal data processing (hereinafter – the "Policy").

1.2 This Policy has been developed in accordance with the current legislation of the Russian Federation on personal data, including Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data" (hereinafter – the "Federal Law on Personal Data").

1.3 This Policy applies to all information classified as personal data under the legislation of the Russian Federation, including personal data processed using the website https://carbonreg.ru/. Kontur JSC does not control and is not responsible for third-party websites that a user may access through links available on the above website.

1.4 This Policy applies to any action (operation) or set of actions (operations) performed with personal data, with or without the use of automated means, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion and destruction of personal data.

1.5 Key terms used in this Policy:

- "blocking of personal data" means the temporary suspension of personal data processing (except where processing is necessary to clarify personal data);
- "personal data information system" means a set of personal data contained in databases and the information technologies and technical means enabling their processing;
- "processing of personal data" means any action (operation) or set of actions (operations) performed with personal data, with or without the use of automated means, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion and destruction of personal data;
- "personal data" means any information relating directly or indirectly to an identified or identifiable individual (personal data subject);
- "carbon unit registry" means the information system of Kontur JSC in which climate projects are registered and records are maintained of carbon units, quota fulfillment units and transactions involving them;
- "personal data subject" means the individual to whom the personal data relates;
- "destruction of personal data" means actions as a result of which it becomes impossible to restore the content of personal data in a personal data information system and/or as a result of which physical media containing personal data are destroyed;
- "participant in the circulation of carbon units" means a legal entity, individual entrepreneur or individual that is the climate project proponent and/or the owner of carbon units and/or a person holding an account in the carbon unit registry and/or another person in accordance with the legislation of the Russian Federation.

2. PRINCIPLES OF PERSONAL DATA PROCESSING

2.1 Personal data processing by Kontur JSC is based on the following principles:

- personal data is processed lawfully and fairly;
- personal data processing is limited to achieving specific, predetermined and lawful purposes;
- personal data processing incompatible with the purposes for which the personal data was collected is not permitted;
- databases containing personal data processed for mutually incompatible purposes may not be combined;
- only personal data that is relevant to the purposes of processing is processed;
- the content and volume of personal data processed correspond to the stated purposes of processing;
- the personal data processed is not excessive in relation to the stated purposes of processing;
- the accuracy and sufficiency of personal data and, where necessary, its up-to-date status to the stated purposes of processing are ensured during processing;
- personal data is stored in a form that permits identification of the personal data subject for no longer than required by the purposes of personal data processing, unless a personal data retention period is established by federal law or by a contract to which the personal data subject is a party, beneficiary or guarantor;
- personal data processed is destroyed or depersonalized once the purposes of processing have been achieved or where the need to achieve such purposes has ceased, unless otherwise provided by federal law.

3. PROCEDURE AND CONDITIONS FOR PERSONAL DATA PROCESSING

3.1 Kontur JSC performs the following actions with subjects' personal data: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion and destruction of personal data, with or without the use of automated means.

3.2 Personal data is processed in compliance with the principles and rules established by the Federal Law on Personal Data. Personal data processing is permitted, inter alia, in the following cases (legal grounds for personal data processing):

- personal data is processed with the consent of the personal data subject to the processing of their personal data;
- personal data processing is necessary to achieve the purposes provided for by an international treaty of the Russian Federation or by law, and to exercise and perform the functions, powers and duties imposed on Kontur JSC by the legislation of the Russian Federation;
- personal data processing is necessary for the performance of a contract to which the personal data subject is a party, beneficiary or guarantor, as well as for entering into a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor;
- personal data processing is necessary to exercise the rights and legitimate interests of Kontur JSC or third parties, or to achieve socially significant purposes, provided that the rights and freedoms of the personal data subject are not thereby violated;
- personal data processing is necessary for the exercise of the powers of federal executive authorities, state extra-budgetary funds, executive authorities of constituent entities of the

Russian Federation and local self-government bodies, and for the performance of the functions of organizations involved in the provision of state and municipal services, respectively.

3.3 Where the personal data subject's written consent to the processing of their personal data is not required, consent may be given by the personal data subject or their representative in any form that allows confirmation of the fact that it was obtained.

3.4 Kontur JSC may entrust personal data processing to another person with the consent of the personal data subject, unless otherwise provided by federal law, on the basis of an agreement entered into with that person. In doing so, Kontur JSC requires the person processing personal data on behalf of Kontur JSC to comply with the principles and rules of personal data processing established by the Federal Law on Personal Data.

3.5 If Kontur JSC entrusts personal data processing to another person, Kontur JSC is liable to the personal data subject for the actions of that person. The person processing personal data on behalf of Kontur JSC is liable to Kontur JSC.

3.6 Kontur JSC undertakes, and requires other persons that have obtained access to personal data, not to disclose personal data to third parties or distribute personal data without the consent of the personal data subject, unless otherwise provided by federal law.

4. REGULATORY AND LEGAL GROUNDS FOR PERSONAL DATA PROCESSING

4.1 Kontur JSC processes personal data in implementation of and in accordance with, inter alia, the following laws and regulations:

- the Constitution of the Russian Federation (Articles 23–24);
- the Labor Code of the Russian Federation (Articles 65–66, 86–90);
- the Tax Code of the Russian Federation;
- the Civil Code of the Russian Federation;
- Federal Law No. 296-FZ dated July 2, 2021 "On Limiting Greenhouse Gas Emissions";
- Federal Law No. 402-FZ dated December 6, 2011 "On Accounting";
- Resolution of the Government of the Russian Federation No. 790 dated April 30, 2022 "On Adoption of the Rules for Establishment and Maintenance of the Carbon Unit Registry as well as for Conducting Transactions with Carbon Units in the Carbon Unit Registry";
- Resolution of the Government of the Russian Federation No. 905 dated May 20, 2022 "On Adoption of a Template for Standard Contract for Operator's Services on Conducting Transactions in the Carbon Unit Registry";
- any other laws and regulations repealing, replacing or amending the above acts, and laws and regulations establishing new requirements for personal data processing.

5. CATEGORIES OF PERSONAL DATA SUBJECTS, PURPOSES OF PROCESSING AND LIST OF PERSONAL DATA PROCESSED

5.1 Kontur JSC processes personal data of the following categories of personal data subjects:

- employees of the Operator;
- employees' immediate family members;
- members of the Board of Directors and candidates for membership on the Board of Directors;
- members of the Audit Commission and candidates for membership on the Audit Commission;
- representatives of the Operator's shareholders;

- participants in the circulation of carbon units and their representatives;
- persons whose carbon footprint is reduced through the retirement of carbon units;
- employees and experts of greenhouse gas verification and validation bodies, of the climate project proponent's contractor;
- other counterparties that are not clients of the registry;
- candidates for vacant positions with the Operator;
- visitors to events organized by the Operator;
- professional advisers and their representatives;
- employees of the Operator's shareholders;
- the General Director of the Operator;
- authors of publications on websites on the Internet;
- officials and employees of authorities supervising the activities of the carbon unit registry operator.

5.2 The purposes of personal data processing by Kontur JSC are (taking into account the information referred to in Clause 5.4 of the Policy): maintaining accounting, financial, personnel and tax records; carrying out and supporting the Operator's activities (including interaction with counterparties and other third parties); complying with labor legislation and ensuring conditions for employees to perform their job duties (including processing provided for by Article 86 of the Labor Code of the Russian Federation); issuing powers of attorney (ordinary and notarized); ensuring compliance with laws and regulations and the Operator's local regulations (including completion of the personal employee card in Form No. T-2 and provision of benefits); preparation for election and the election itself to the Operator's Board of Directors; functioning of the Board of Directors; preparation for election and the election itself to the Operator's Audit Commission; functioning of the Audit Commission; functioning of the general meeting of shareholders; personnel recruitment, assistance with employment and selection of a suitable position; performance of all obligations of the carbon unit registry operator, including publication on the registry operator's website of information on a climate project; publication on the registry operator's website of information on the registry operator's activities and information necessary for the development of the carbon unit market in the Russian Federation; publication on the registry operator's website of information on a person whose carbon footprint is reduced through the retirement of carbon units; performance of all functions of the carbon unit registry operator (including providing explanations on completing applications and document requirements); publication of information on a climate project on the carbon unit registry operator's website; entering into and terminating contractual relationships with counterparties and performance of all contractual obligations; organization of conferences and events; conducting inspections of the Operator and selecting an adviser for inspections based on commercial proposals received by the Operator; communication with employees of the Operator's shareholders on matters relating to the Operator's current activities; disclosure of information on the Operator's management bodies in accordance with applicable law and the Operator's internal documents; publication of news and materials on the registry operator's website; supervision of the activities of the carbon unit registry operator.

5.3 The list of personal data processed by the Operator is as follows (taking into account the information referred to in Clause 5.4 of the Policy): last name, first name, patronymic; date of birth; telephone number; email address; identity document details; income information; name of employer organization; foreign passport details; structural unit and positions; residential address; SNILS; INN; citizenship; marital status; family composition information; military registration data; education data; taxpayer status; previous employment history; photographic image (not biometric personal data because it is not used to establish identity and does not meet the requirements of GOST R ISO/IEC 19794-5-2013); degree of relationship to an employee; information from documents entitling a person to benefits and confirming kinship; gender;

information on professional experience and professional activities; information on membership in management bodies of legal entities and organizations; information on ownership of shares (interests in the charter (partnership) capital) of the company and its affiliates; information on ownership of shares (interests in the charter (partnership) capital) of other legal entities; information relevant to the ability to perform duties as a member of the company's Board of Directors or Audit Commission; date of state registration of an individual entrepreneur; OGRNIP; client code; tax status.

5.4 For each purpose of personal data processing specified in Clause 5.2 of the Policy, the Operator has determined the categories and list of personal data processed, the categories of subjects whose personal data is processed, and the legal grounds for personal data processing. This information is publicly available in the Register of Personal Data Operators (https://pd.rkn.gov.ru/operators-registry/operators-list/?id=77-22-031025).

5.5 For each purpose of personal data processing specified in Clause 5.2 of the Policy, the Operator applies the following methods and periods of processing and storage of personal data, and the following procedures for storage and destruction of personal data:

- Processing method: mixed personal data processing, with transmission via the Internet.
- Personal data is processed and stored for no longer than required by the purposes of personal data processing, unless another personal data retention period is established by federal law or by a contract to which the personal data subject is a party, beneficiary or guarantor.
- Personal data processed is destroyed once the purposes of processing have been achieved or where the need to achieve those purposes has ceased, unless otherwise provided by federal law.
- Personal data is destroyed by mechanically compromising the integrity of paper media containing personal data so that the personal data cannot be read or restored, or by deleting it from electronic media using methods and means that ensure guaranteed deletion of information.

5.6 If information on personal data processing changes, including information on the purposes of personal data processing, Kontur JSC updates such information by submitting notification to Roskomnadzor in the manner and within the time limits established by the legislation of the Russian Federation.

6. PROCESSING OF PERSONAL DATA USING INFORMATION AND TELECOMMUNICATION NETWORKS

6.1 Kontur JSC processes personal data using information and telecommunication networks for the purposes and subject to the conditions set out below:

Purpose of personal data processing	Categories of personal data subjects	Categories and list of personal data
Performance of all obligations of the carbon unit registry operator, including publication on the registry operator's website of information on a climate project	Participants in the circulation of carbon units and their representatives	- last name, first name, patronymic; - date of birth; - place of residence; - identity document details; - SNILS; - INN; - date of state registration (for an individual entrepreneur); - OGRNIP; - client code; - telephone number; - position and name of organization; - email address.

Publication on the registry operator's website of information on the registry operator's activities and information necessary for the development of the carbon unit market in the Russian Federation	Participants in the circulation of carbon units and their representatives	- last name, first name, patronymic; - position and name of organization; - telephone number; - email address.
Publication on the registry operator's website of information on a person whose carbon footprint is reduced through the retirement of carbon units	Persons whose carbon footprint is reduced through the retirement of carbon units	- last name, first name, patronymic; - date of state registration (for an individual entrepreneur); - taxpayer status; - OGRNIP; - position and name of organization.
Performance of all functions of the carbon unit registry operator (including providing explanations on completing applications and document requirements)	Participants in the circulation of carbon units and their representatives	- last name, first name, patronymic; - date of birth; - place of residence; - identity document details; - SNILS; - INN; - date of state registration (for an individual entrepreneur); - OGRNIP; - client code; - telephone number; - position and name of organization; - email address.
Publication of information on a climate project on the carbon unit registry operator's website	Employees and experts of greenhouse gas verification and validation bodies, of the climate project proponent's contractor	- last name, first name, patronymic; - position and name of organization; - telephone number; - email address.
Disclosure of information on the management bodies of Kontur JSC in accordance with applicable law and the internal documents of Kontur JSC	General Director of Kontur JSC	- last name, first name, patronymic; - place of work; - telephone number; - email address; - date and year of birth; - education information; - information on ownership of shares (interests in the charter (partnership) capital) of the company; - photographic image (not biometric personal data because it is not used to establish identity and does not meet the requirements of GOST R ISO/IEC 19794-5-2013).
Publication of news and materials on the registry operator's website	Authors of publications on websites on the Internet	- last name, first name, patronymic; - position and name of organization.

6.2 For each purpose of personal data processing, Kontur JSC applies the methods and periods of processing and storage of personal data, and the procedures for storage and destruction of personal data specified in Clause 5.5 of the Policy.

7. RIGHTS AND OBLIGATIONS OF KONTUR JSC AND PERSONAL DATA SUBJECTS

7.1 Kontur JSC has the right to:

- independently determine the composition and list of measures necessary and sufficient to ensure fulfillment of the obligations established by the Federal Law on Personal Data and laws and regulations adopted pursuant thereto, unless otherwise provided by the Federal Law on Personal Data or other federal laws;
- entrust personal data processing to another person with the consent of the personal data subject, unless otherwise provided by federal law, on the basis of an agreement entered into with that person;
- if a personal data subject withdraws consent to personal data processing, continue processing personal data without the subject's consent where grounds specified in the Federal Law on Personal Data exist.

7.2 In accordance with the requirements of the Federal Law on Personal Data, Kontur JSC undertakes to:

- provide the personal data subject, upon request, with information concerning the processing of their personal data, or lawfully refuse to provide such information;
- at the request of the personal data subject, clarify personal data being processed, or block or delete it if the personal data is incomplete, outdated, inaccurate, unlawfully obtained or not necessary for the stated purpose of processing;
- keep records of requests from personal data subjects;
- notify the personal data subject of personal data processing where the personal data was not obtained from the personal data subject, except in cases provided for by the Federal Law on Personal Data;
- once the purpose of personal data processing has been achieved, immediately cease processing the personal data and destroy or depersonalize the relevant personal data within no more than thirty days from the date the purpose of processing is achieved, unless otherwise provided by a contract to which the personal data subject is a party, beneficiary or guarantor, another agreement between Kontur JSC and the personal data subject, or if Kontur JSC is not entitled to process personal data without the personal data subject's consent on grounds provided for by the Federal Law on Personal Data or other federal laws;
- if the personal data subject withdraws consent to the processing of their personal data, cease processing the personal data and destroy or depersonalize the personal data within no more than thirty days from receipt of such withdrawal, unless otherwise provided by an agreement between Kontur JSC and the personal data subject;
- upon receipt of a request from the personal data subject to cease personal data processing for the purpose of promoting goods, works or services on the market, immediately cease processing the personal data.

7.3 The personal data subject has the right to:

- receive personal data relating to that subject and information concerning its processing;
- request clarification, blocking or destruction of their personal data if it is incomplete, outdated, inaccurate, unlawfully obtained or not necessary for the stated purpose of processing;

- withdraw consent previously given to personal data processing;
- protect their rights and legitimate interests, including claiming compensation for losses and moral damages in court;
- appeal actions or omissions of Kontur JSC to the competent authority for the protection of personal data subjects' rights or in court.

7.4 To exercise their rights and legitimate interests, the personal data subject may contact Kontur JSC or submit a request in person or through a representative.

8. MEASURES TO ENSURE THE SECURITY OF PERSONAL DATA DURING PROCESSING

8.1 When processing personal data, Kontur JSC takes the necessary legal, organizational and technical measures to protect personal data against unlawful or accidental access, destruction, modification, blocking, copying, provision or distribution, as well as against other unlawful actions involving personal data.

8.2 Personal data security is ensured, in particular, by:

- identifying threats to personal data security when personal data is processed in personal data information systems;
- applying organizational and technical measures to ensure personal data security when personal data is processed in personal data information systems, as necessary to comply with personal data protection requirements whose implementation ensures the levels of personal data protection established by the Government of the Russian Federation;
- using information security tools that have undergone the prescribed conformity assessment procedure;
- using, for the destruction of personal data, information security tools that have undergone the prescribed conformity assessment procedure and incorporate an information destruction function;
- regularly assessing the effectiveness of measures taken to ensure personal data security;
- maintaining records of machine-readable media containing personal data;
- detecting unauthorized access to personal data and taking measures to identify the causes and eliminate possible consequences;
- restoring personal data modified or destroyed as a result of unauthorized access;
- establishing rules governing access rights to personal data processed in a personal data information system and ensuring the registration and recording of all actions performed with personal data in the personal data information system;
- monitoring the measures taken to ensure personal data security and the level of protection of personal data information systems.

8.3 Kontur JSC independently determines the set of personal data security measures necessary to protect personal data against current personal data security threats, taking into account the requirements of applicable law (including the requirements of FSTEC of Russia). Kontur JSC discloses general information on the measures taken as part of the information published in the Register of Personal Data Operators (https://pd.rkn.gov.ru/operators-registry/operators-list/).

Current version of the document dated October 21, 2026