PERSONAL DATA PROCESSING POLICY

(in accordance with Federal Law No. 152-FZ "On Personal Data" and the General Data Protection Regulation, GDPR)
Effective date: June 1, 2026

1. Data Controller

The data controller is Limited Liability Company "Enhanced Oil Recovery Enterprise 'SibBurMash'" (LLC PPN SibBurMash), State Registration Number (OGRN) 1127232073814, Taxpayer ID (INN) 7204186388, Tax Registration Reason Code (KPP) 722401001, located at: Bldg. 4, Yuzhny Industrial Zone, Borovsky settlement, Tyumen District, Tyumen Region, 625504, Russia (the "Controller", the "Company").

2. Categories of Data Subjects

• visitors to the Company's website;
• representatives of counterparties, partners, and clients (B2B contacts);
• job applicants submitting résumés for the Company's vacancies;
• other individuals communicating with the Company in the course of business correspondence.

3. Categories of Personal Data Processed

Full name; job title; organization name; contact phone number; e-mail address; content of inquiries and correspondence; résumé data (when applying for a vacancy); technical data (IP address, cookies, browser data).

4. Legal Basis for Processing

For data subjects located in the Russian Federation, processing is carried out in accordance with Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006.
For data subjects located in the European Union, the legal bases for processing are:
• the data subject's consent (Art. 6(1)(a) GDPR);
• the necessity of processing for the performance of a contract to which the data subject is party (Art. 6(1)(b) GDPR);
• the Controller's legitimate interest in conducting its business activities, provided such interest is not overridden by the data subject's rights and freedoms (Art. 6(1)(f) GDPR).

5. Data Retention Period

Personal data is retained for as long as necessary to achieve the purposes of processing, or for the periods established by applicable Russian law (including for accounting and tax purposes), after which it is deleted or anonymized.

6. Rights of Data Subjects

A data subject has the right to: request access to their personal data and information about its processing; request correction or deletion of personal data, or restriction of its processing; object to the processing of personal data; withdraw consent to processing at any time; and lodge a complaint with the competent supervisory authority responsible for the protection of data subjects' rights.

7. Data Localization

The collection, recording, systematization, accumulation, storage, updating, and retrieval of personal data of Russian citizens is carried out by the Controller using databases physically located within the territory of the Russian Federation, in accordance with the requirements of Federal Law No. 152-FZ.

8. Cross-Border Data Transfers

Where cross-border transfer of personal data outside the Russian Federation is necessary, the Controller gives prior notice to the competent Russian data protection authority (Roskomnadzor) in the manner established by law before such transfer takes place. With respect to transfers to states that do not ensure an adequate level of data protection, or to states included in the relevant restricted lists, the Controller follows the additional requirements and restrictions established by Russian law. When personal data is transferred outside the European Economic Area, the Controller ensures an adequate level of protection in accordance with the GDPR, including, where applicable, entering into agreements incorporating standard data protection clauses.

9. Data Breach and Incident Notification

If the Controller identifies unlawful or accidental transfer, disclosure, or distribution of personal data, or unlawful access to it, the Controller: records the incident in an internal document specifying the date, time, scope, and categories of data affected; submits a primary notification to Roskomnadzor within 24 hours of discovering the incident; and submits a follow-up notification with the results of its internal investigation within 72 hours, in accordance with Article 21(3.1) of Federal Law No. 152-FZ. Where required by law, incident information is also reported to the relevant specialized state computer-attack response systems. Data subjects whose rights may be affected are informed in the manner and in the cases prescribed by applicable law.

10. Anonymization of Personal Data

The Controller may anonymize personal data for statistical and other research purposes in accordance with the anonymization rules in force since September 1, 2025. The provision and distribution of data obtained through anonymization is carried out in compliance with requirements agreed with the competent data protection authority, in the cases prescribed by law.

11. Contact Person and Details

For any questions related to the processing of personal data, or to exercise data subject rights, please contact:
LLC PPN SibBurMash
Bldg. 4, Yuzhny Industrial Zone, Borovsky settlement, Tyumen District, Tyumen Region, 625504, Russia
Phone: +7 (3452) 56-85-84
E-mail: secretary_ppn@ppnsibburmash.ru