

PRIVACY POLICY

Effective date: June 1, 2026

1. General Provisions

This Privacy Policy (the "Policy") applies to all information that Limited Liability Company "Enhanced Oil Recovery Enterprise 'SibBurMash'" (LLC PPN SibBurMash, State Registration Number (OGRN) 1127232073814, Taxpayer ID (INN) 7204186388), located at: bldg. 4, Yuzhny Industrial Zone, Borovsky settlement, Tyumen District, Tyumen Region, 625504, Russia (the "Company", "we"), may obtain about a user (the "User") while using the Company's website (the "Site").

2. What Data We Collect

- Data provided directly by the User when completing forms on the Site: name, e-mail, phone number, company name, message content, résumé (when applying for a job vacancy);
- Data automatically transmitted while using the Site: IP address, cookie data, browser type and version, operating system, date and time of access, pages visited.

3. Purposes of Processing Personal Data

- handling incoming inquiries and feedback from Users;
- providing information about the Company's products, technologies, and services;
- reviewing applicants' résumés and recruitment;
- concluding and performing contracts with counterparties;
- improving the operation and usability of the Site;
- conducting statistical and analytical research.

4. Legal Basis for Processing

Personal data is processed in accordance with Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006. For Users who are residents of the European Union, data processing is additionally carried out in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR").

5. Disclosure to Third Parties

The Company does not disclose personal data to third parties except where: the User has given separate consent; disclosure is necessary to perform a contract; disclosure is required by applicable law; or data is shared with contractors supporting the technical operation of the Site (subject to their confidentiality obligations). Under amendments to Federal Law No. 152-FZ in force since May 30, 2025, consent to the processing of personal data, consent to its disclosure, and consent to cross-border transfer are treated as separate, independent forms of consent and may not be combined into a single blanket consent or checkbox.

6. Data Localization and Cross-Border Transfer

The collection, recording, systematization, accumulation, and storage of personal data of Russian citizens is carried out using databases located within the territory of the Russian Federation. Where cross-border transfer of personal data is required (for example, when using foreign analytics services), the Company gives prior notice to the competent Russian data protection authority (Roskomnadzor) in the manner established by law and ensures an adequate level of protection for the data transferred.

7. Data Breach and Incident Notification

If the Company identifies unlawful transfer, disclosure, or distribution of personal data, or unauthorized access to it, the Company notifies the competent Russian data protection authority within 24 hours of discovering the incident, and submits a follow-up notice 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, affected Users are informed in the manner prescribed by applicable law.

8. User Rights

The User has the right to: receive information regarding the processing of their personal data; request correction, blocking, or deletion of personal data that is incomplete, outdated, inaccurate, or unlawfully obtained; withdraw consent to the processing of personal data; and lodge a complaint with the competent data protection authority (e.g., Roskomnadzor for Russian data subjects, or the relevant supervisory authority in the EU).

9. Data Protection Measures

The Company takes the necessary legal, organizational, and technical measures to protect personal data against unlawful or accidental access, destruction, alteration, blocking, copying, distribution, and any other unlawful actions by third parties.

10. Data Retention Period

Personal data is processed and retained for as long as necessary to achieve the purposes of processing, or until the User withdraws consent, unless a different retention period is required by applicable law.

11. Changes to This Policy

The Company may amend this Policy at any time. The updated version takes effect from the moment it is published on the Site, unless otherwise specified in the new version.

12. Contact Information

For questions related to the processing of personal data, please contact:

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