REGULATION

# H-P

About processing of personal data of the user of the website https://chelpipe.ru/ and https://chelpipegroup.com/

Chelyabinsk, 2019
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1. Information card

<table>
<thead>
<tr>
<th>1.1 Effective date of the document</th>
<th>01.12.2019</th>
</tr>
</thead>
<tbody>
<tr>
<td>1.2 Expiration date of the document</td>
<td>30.11.2024</td>
</tr>
<tr>
<td>1.3 Information on the document to be replaced by this document</td>
<td>Regulation d/d 29.11.2018 No. H - P 03.2.069 &quot;About processing of personal data of the user of the website <a href="http://www.chelpipe.ru">www.chelpipe.ru</a>&quot;</td>
</tr>
</tbody>
</table>

2. General provisions

<table>
<thead>
<tr>
<th>Business process / Area of activities</th>
<th>Personnel Management</th>
</tr>
</thead>
<tbody>
<tr>
<td>Purpose of the document</td>
<td>Compliance with the requirements of the current legislation of the Russian Federation regarding the personal data processing and protection</td>
</tr>
<tr>
<td>Scope of application</td>
<td>The Regulation applies only to the Company's website and is intended to declare the Company's relationship to processing of the personal data of the website users</td>
</tr>
<tr>
<td>Person responsible for control</td>
<td>Head of the Human Resources Division</td>
</tr>
<tr>
<td>Responsible for making changes</td>
<td>Head of the Personnel Subdivision</td>
</tr>
</tbody>
</table>

3. Terms, definitions, symbols and abbreviations

<table>
<thead>
<tr>
<th>3.1 Terms and definitions</th>
<th>Term definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Website administration</td>
<td>Employees authorized to manage the website acting on behalf of the Company, who organize and (or) carry out processing of the personal data, as well as to determine the purpose of the personal data processing, scope of the personal data to be processed, actions (operations) performed with the personal data</td>
</tr>
<tr>
<td>Personal data</td>
<td>Any information relating directly or indirectly to the specific or specified individual (subject of the personal data)</td>
</tr>
<tr>
<td>Processing of the personal data</td>
<td>Any action (operation) or a set of actions (operations) performed using automation tools or without using of such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of the personal data</td>
</tr>
<tr>
<td>Confidentiality of the personal data</td>
<td>Mandatory compliance by the Company or other persons who have gained access to the personal data with the requirements of the current legislation regarding non-disclosure and prevention of the personal data dissemination without consent of the personal data subject or other legitimate grounds</td>
</tr>
<tr>
<td>User of the website</td>
<td>A person who has access to the website via the Internet and uses the website of the Company</td>
</tr>
<tr>
<td>IP-address</td>
<td>The unique network address of a node in the computer network built according to IP</td>
</tr>
</tbody>
</table>

### 3.2 Designations and abbreviations

<table>
<thead>
<tr>
<th>Abbreviation/ designation</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>Client</td>
<td>User of the information systems and websites (products) of the Company</td>
</tr>
<tr>
<td>Company</td>
<td>PJSC &quot;ChelPipe&quot;</td>
</tr>
<tr>
<td>Website of the Company</td>
<td>Corporate website of ChelPipe Group, located at the address: <a href="https://chelpipe.ru/">https://chelpipe.ru/</a> and <a href="https://chelpipegroup.com/">https://chelpipegroup.com/</a></td>
</tr>
<tr>
<td>Subject</td>
<td>User of the website</td>
</tr>
</tbody>
</table>

### 4. List of reference documents

<table>
<thead>
<tr>
<th>Document type, date and number</th>
<th>Document title</th>
</tr>
</thead>
<tbody>
<tr>
<td>Constitution of the RF</td>
<td>Constitution of the Russian Federation</td>
</tr>
<tr>
<td>Federal law d/d 27.07.2006 No. 152-FZ</td>
<td>On personal data</td>
</tr>
<tr>
<td>Federal law d/d 27.07.2006 No. 149-FZ</td>
<td>On information, information technologies and information protection</td>
</tr>
</tbody>
</table>
5. General information

5.1 Regulation "On processing of personal data of the users of the website https://chelpipe.ru/ and https://chelpipegroup.com/" (hereinafter - the Regulation) discloses the legal grounds of the Companies for processing of the user’s personal data, principles and purposes of such processing, contents and rules of processing, information on the Company’s organization of the user’s personal data protection, as well as information on the rights of the personal data subjects.

5.2 The Regulation is a public document declaring the conceptual basis of the Company’s activities during processing and protection of the user’s personal data.

5.3 The Company sends a notification to the authorized body for protection of the personal data subjects’ rights on its intention to process the personal data. The Company updates the information specified in the notification in good faith and within the appropriate time.

5.4 The user’s consent to processing of the personal data is indicated by adding the "V" sign when filling out the appropriate window form posted on the Company’s website: https://chelpipe.ru/ and https://chelpipegroup.com/ (hereinafter - the website).

5.5 Leaving their personal data on the website by filling out the online form, the user:
- confirms that the personal data specified by him belong to him personally;
- acknowledges and confirms that he is carefully and fully informed about this Regulation and conditions contained therein of his personal data processing specified in the form on the website;
- acknowledges and confirms that all terms of this Regulation on processing and terms of his personal data processing are clear to him;
- agrees with the terms of the personal data processing without any conditions and restrictions.

5.6 In case of disagreement with conditions of the personal data processing, the user must stop using the Company’s website in the sections "Buy a product", "Order a product" and "Ask a question", "Order a service", "Apply for a job", "Enroll for an internship", "Check the quality certificate", "Sign up for a newsletter", "Subscribe to the calendar of events".

5.7 The Company does not control and is not responsible for websites of the third parties whose links the user can click on which are available on the Company’s website.

5.8 The website administration does not verify accuracy of the personal data provided by the website user.

6. Goals and objectives of the personal data processing of the website user

6.1 The website administration can use the user's personal data for the following purposes:
- preparation for conclusion and implementation of the contracts;
- registration / authorization of the Client on the website;
- processing of orders with the purpose to identify and solve technical problems of the Client;
- order of a service;
- application for a job;
- enrollment for an internship;
- quality certificate verification;
- news subscriptions;
- subscriptions to the calendar of events;
- communication with the Client, including sending of notifications, requests and information related to execution of the contracts, as well as processing of requests and applications received from the Client, including possible mailing of information and advertisement;
- identification of the user who left his personal data to make an order or to communicate with managers;
- establishment of feedback with the user, including sending of notifications, requests relating to use of the website, processing of requests from the user;
- determine the user's location to ensure security, fraud prevention;
- confirmation of accuracy and completeness of the personal data provided by the user;
- provision of the user with effective client and technical support in case of problems related to use of the website
- identification and solution of technical problems;
- as well as for any other purposes, other activities within the limits of the legislation of the Russian Federation, with mandatory compliance with the requirements of the legislation of the Russian Federation relating to personal data.

6.2 The goal of the website user's personal data processing is to comply with the principles of legality and confidentiality, as well as safety ensuring of their processing.

7. Principles of the website user's personal data processing

The personal data of the website user shall be processed on the basis of compliance with the following principles:
- legality - compliance with the requirements of laws and other regulatory legal acts during processing of the website users' personal data;
- observance of human rights and freedoms - human rights and freedoms are the highest values enshrined in the Constitution of the Russian Federation;
- confidentiality - implementation of a set of measures to minimize risks of the personal data dissemination to the third parties without consent of the personal data subjects;
- security - implementation of a set of measures to ensure protection of processing processes of the personal data which the user provides at the request of the website administration;
- compliance of measures with external and internal threats to information security.

8. Subject of the Regulation

8.1 This Regulation establishes obligations of the Company's website administration to non-disclosure and ensuring of confidentiality protection of the personal data that the user provides at the request of the website administration when the user applies to the sections "Order a product", "Buy a product" and "Ask a question".

8.2 Personal data permitted for processing under this Regulation are provided by the user by filling out a form on the website in the sections "Order a product", "Buy a
product” and "Ask a question" and include the following information:
- last name, first name, patronymic of the user;
- user's contact phone number;
- e-mail address;
- date of birth;
- cookie files;
- place of work;
- position (quality certificate verification service)
- address
- IP addresses of the visitors.

8.3 The Company undertakes to securely store and not to transfer the user’s personal data, except for the cases provided in clause 9.2, clause 12.3 of this Regulation.

9. Methods and terms of the personal data processing

9.1 Processing of the user’s personal data is carried out within the period necessary to achieve the goal of the processing in any legal way, including in the information systems of the personal data using the automation tools or without the use of such tools.

9.2 The user’s personal data may be transferred to the authorized government bodies of the Russian Federation only on the grounds and in the manner established by the legislation of the Russian Federation.

9.3 In case of loss or disclosure of the personal data, the website administration informs the user about the loss or disclosure of the personal data.

9.4 The website administration takes the necessary organizational and technical measures to protect the user’s personal information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of the third parties.

9.5 The website administration together with the user takes all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the user’s personal data.

9.6 Processing of the personal data by the Company includes collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution within the ChelPipe Group, provision, access), blocking, deletion and destruction of the personal data.

The Company makes the cross-border transfer of the personal data: MSA, the Czech Republic; Rimera Overseas (UAE); Rimera Kazakhstan.

9.7 The Company uses publicly available sources of the personal data (including creating them) only in cases where it does not contradict with the law, and when it has sufficient legal grounds for this, including with the written consent of the personal data subjects.

9.8 The Company does not make decisions that give rise to legal consequences in respect of the personal data subjects or otherwise affect their rights and legitimate interests on the basis of exclusively automated processing of their personal data.

9.9 The Company processes the personal data with the use of automation means and without the use of such means.

10. Organization of the personal data protection
While processing the personal data, the Company takes all necessary legal, organizational and technical measures to protect them from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution, as well as from other illegal actions against them. Ensuring security of the personal data is achieved, in particular, in the following ways:

- by appointment of a responsible person for organization of the personal data processing;
- by appointment of a responsible person for ensuring security of the personal data;
- by implementation of internal control and / or audit of compliance of the personal data processing with the Federal law d/d 27.07.2006 No. 152-FZ "On personal data" and normative legal acts adopted in accordance with it, requirements for the personal data protection, local acts;
- by acquaintance of the Company’s employees directly engaged in the personal data processing with provisions of the legislation of the Russian Federation regarding personal data, including with requirements for protection of the personal data, with local acts concerning the personal data processing and (or) training of these workers;
- by application of organizational and technical measures to ensure security of the personal data during their processing in information systems of the personal data necessary to meet the requirements for protection of the personal data;
- by efficiency assessment of the measures taken to ensure security of the personal data before commissioning of the personal data information system;
- by detection of unauthorized access to the personal data and taking of the appropriate measures;
- by establishment of rules for access to the personal data processed in the personal data information system, as well as ensuring registration and accounting of all actions carried out with the personal data in the personal data information system;
- by control over the measures taken to ensure security of the personal data and level of protection of the personal data information systems;
- by defining and specifying the duties of the Company’s employees engaged in processing and protection of the personal data, as well as their responsibilities in the local regulatory legal acts of the operator.

11. Rights of the personal data subjects

11.1 The personal data subjects have the right to receive information on processing of their personal data by the Company.

11.2 The personal data subjects have the right to demand from the Company clarification of these personal data, their blocking or destruction if they are incomplete, outdated, inaccurate, illegally obtained or cannot be recognized as necessary for the stated purpose of processing, as well as to take measures provided by the law to protect their rights.

11.3 The right of the personal data subjects to access their personal data may be limited in accordance with the federal laws, including if the access of the personal data subjects to their personal data violates the rights and legitimate interests of the third parties.

11.4 To exercise and protect their rights and legitimate interests, the personal data subjects have the right to apply to the Company. The Company considers any appeals and complaints from the personal data subjects, thoroughly investigates the facts of violations
and takes all necessary measures for their immediate elimination, punishment of the perpetrators and settlement of disputes and conflict situations in the pre-trial order.

11.5 The personal data subjects have the right to appeal against actions or inaction of the Company by applying to the authorized body for protection of the rights of the personal data subjects.

11.6 The personal data subjects have the right to protect their rights and legitimate interests, including compensation for losses and / or compensation for moral harm in a judicial procedure in cases established by the law.

12. Obligations and responsibilities of the Company

12.1 The Subject is obliged to provide information on the personal data necessary for execution of the order or for communication with the Company's managers via the Internet.

12.2 The website administration is obliged to:

12.2.1 Use the information obtained exclusively for the purposes specified in section 5 of the Regulation.

12.2.2 Ensure storage of the personal data in secret, not to transfer without the prior written consent of the user, as well as not to sell, exchange, publish in other possible ways the user's personal data, except for paragraph 9.2 of the Regulation.

12.2.3 Take precautions to protect confidentiality of the user's personal data in accordance with the legislation of the Russian Federation relating to processing and protection of the personal data.

12.2.4 In case of detection of inaccurate personal data or misconduct, to block the personal data relating to the specific user upon request or application of the user or his/her legal representative or authorised body for protection of the personal data subjects' rights for the period of verification.

12.3 The website administration, which has not fulfilled its obligations, shall be liable in connection with illegal use of the personal data, in accordance with legislation of the Russian Federation, except for the cases provided in clause 9.2 of the Regulation.

In case of loss or transfer of the personal data, the website administration is not responsible if the personal data:

- became a public domain before their loss or transfer;
- were received from the third party prior to their receipt by the website administration;
- were transferred with the consent of the user.

13. Final provisions

13.1 Before filing a claim on disputes in court arising from relationship between the Company’s website user and the website administration, submission of a claim (a written proposal for voluntary settlement of the dispute) is mandatory.

13.2 The claimant shall notify the claimant in writing on results of the claim consideration within 30 calendar days from the date of the claim receipt.

13.3 If no agreement is reached, the dispute will be taken to court in accordance with the current legislation of the Russian Federation.

13.4 Current legislation of the Russian Federation shall apply to this Regulation on
<table>
<thead>
<tr>
<th>PJSC &quot;ChelPipe&quot;</th>
<th>Regulation</th>
</tr>
</thead>
<tbody>
<tr>
<td>About processing of personal data of the user of the website <a href="https://chelpipe.ru/">https://chelpipe.ru/</a> and <a href="https://chelpipegroup.com/">https://chelpipegroup.com/</a></td>
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</tr>
</tbody>
</table>

processing and relations between the user and the website administration.

13.5 The website administration has the right to make changes to this Regulation without the user's consent.

13.6 The new Regulation shall enter into force from the effective date of the document, unless otherwise provided by the new version of the Regulation.

13.7 All proposals or questions regarding this Regulation should be addressed to: info@chelpipe.ru.

Head of Human Resources Division

[Signature]

E. I. Bogush
Electronic consent form

Consent to the personal data processing

I, acting on my own will and in my own interest (hereinafter referred to as the Client), give my consent to PJSC "ChelPipe" (hereinafter - the Operator), the name of the Operator: Public Joint Stock Company "Chelyabinsk Pipe Plant" (PJSC "ChelPipe"), the address of the Operator: 21 Mashinostroiteley Street, Chelyabinsk, Russia, 454129, on processing of my personal data with the purpose of:

- preparation for conclusion and implementation of the contracts;
- registration / authorization on the website;
- processing of orders with the purpose to identify and solve technical problems;
- order of a service;
- application for a job;
- enrollment for an internship;
- quality certificate verification;
- news subscriptions;
- subscriptions to the calendar of events;
- communication with the Client, including sending of notifications, requests and information relating to execution of the contracts, as well as processing of requests and applications received from the Client, including possible mailing of information and advertisement;
- identification of the user who left his personal data to make an order or to communicate with managers;
- establishment of feedback with the user, including sending of notifications, requests relating to use of the website, processing of requests from the user;
- determine the user's location to ensure security, fraud prevention;
- confirmation of accuracy and completeness of the personal data provided by the user;
- provision of the user with effective client and technical support in case of problems related to use of the website;
- identification and solution of technical problems;
- as well as for any other purposes, other activities within the limits of the legislation of the Russian Federation, with mandatory compliance with the requirements of the legislation of the Russian Federation relating to personal data.

The personal data to the processing of which I give my consent include the following:

- last name, first name, patronymic;
- contact phone number;
- e-mail address;
- date of birth;
- cookie files;
- place of work;
- position (quality certificate verification service)
- address;
- IP-addresses.
My consent to processing of the personal data applies to all methods of processing, including collection, recording, systematization, accumulation, storage, clarification (update, change, extraction), use, transfer to the limited number of persons in accordance with the legislation of the Russian Federation), blocking, deletion, destruction, both with and without the use of automation means.

I confirm that the personal data specified by me belong to me personally. I acknowledge and confirm that I have carefully and fully read the Regulation and conditions of my personal data processing contained therein, indicated in the form on the website, all sections of this Regulation and conditions of my personal data processing are clear. I agree to the terms of the personal data processing without any conditions and restrictions in accordance with the legislation of the Russian Federation.

The operator has the right to transfer my personal data for processing in accordance with the legislation of the Russian Federation to the third parties belonging to ChelPipe Group.

This consent becomes effective from the moment I provide my personal data and is valid until purposes of the personal data processing are achieved.

I agree that this consent may be withdrawn at any time by sending a statement to the Operator in any form.