

**CONFIDENTIALITY PROVISION  
ITS CENTRAL SECURITIES DEPOSITORY LIMITED**

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## **1. General Provisions**

This Provision applies to persons who gain access, use, visit and/or interact with the Company's products, services, websites, events, platforms, software and applications (including third party platforms with websites and/or content) that contain hyperlinks to this Provision (the "Services"); independent contractors or consultants engaged by the Company to perform and/or provide services; as well as subcontractors, sellers, providers or service providers and their employees.

As a rule, our Services are not to be used by children. We do not intentionally collect personal information from or about persons under the age of thirteen.

If we learn or discover that we have collected personal information incompatible with this Provision, we will ensure that processing of such personal information is carried out for legitimate purposes, and we will make reasonable efforts to erase such personal information.

Depending on the Services, we may provide additional or different confidentiality statements or notices for specific interactions.

As part of our Services, there may be links to third party websites or applications. We are not responsible for the content or confidentiality compliance of third party websites or applications. Users must check these websites or applications for their confidentiality statements and terms applicable thereto.

The Provision does not apply when the Company acts in the role of or as a processor or a service provider (or in any other similar role or capacity) of personal information on behalf of a third party. In this case, the Company processes personal information according to the requirements and instructions of a third party, taking into account confidentiality provisions of the third party.

For some Services, the Company makes decisions about the use of personal information in the context of the Services (in this case, the Company will be the compliance officer for personal information), as for other Services, the Company will use personal information only in accordance with instructions of the subjects (in this case, the Company will be the processor of personal information).

The Company is the compliance officer for personal information regarding the Services provided, unless otherwise is specified.

You can learn more about our Services on our official website on the Internet.

If you want to contact the Company, please, contact us through the contact form on the website or at our address.

## **2. Sources of Personal Information**

The Company collects personal information through the following sources:

- interaction with the Company and the Company's Services (for example, when you purchase or use the Services, provide the Services to us, subscribe to use the Services, request information or receive marketing or other messages from us (e.g., marketing e-mail messages, notifications, newsletters, etc.), register for events, submit applications or contact us for support (we may record or track our phone calls to ensure compliance and quality)).

- your system/device and use of our Services. Our servers, logs and other technologies may automatically collect certain information from you or about you, your systems and devices (for example, IP address, user ID, etc.), as well as usage information to help us administer, protect (detect and prevent fraud and security threats), improve our Services, analyse the usage and improve user experience.

- cookies and similar technologies included in our Services.

- interaction with the Company as an independent contractor/consultant.

We may also collect personal information from third parties, such as:

- a party or a person(s) who arranged for you to access our Services (for example, your employer, subscriber, organisation, group or association which you belong or are associated to) to create a user account or access the Services in a different way.

- partners and service providers who cooperate with us in relation to our Services.

- companies that provide content or information to be used in the Services

- publicly available sources (for example, publicly available sources, as a rule, via the Internet (for example, publicly available websites), available in or through widely distributed mass media, as well as ones from government databases, records and systems (for example, the U.S. Securities and Exchange Commission, Companies House, sanctions lists, etc.)).

To the extent that any personal information is provided to us by a third party other than the personal data subject, such third parties are also responsible for compliance with applicable personal data and confidentiality protection laws.

## **3. Types of Collected Personal Information**

Types and categories of personal information that the Company collects depend on the way you interact with us, what Services you buy or use, as well as the type of the Services.

Depending on the Services you use or your interaction with us in respect to the relevant Services, personal information we collect may include:

- Contact details, such as first and last names, e-mail address, postal address, phone number and other contact details.
- Data on the employer and professional level, such as names of your current and/or former employers, positions, business contact details, industry, certificates, etc.
- Education data, such as your education history.
- Account credentials, such as passwords and other security information for authentication and access.
- User content, such as messages and files provided by you in connection with your use of the Services.
- Payment information, such as the prepaid card number (credit or debit card) and the security code connected to your means of payment when you make a payment.
- Device information, such as information about your device, for example, IP address, location, identification numbers of the device or provider.
- Usage information and browsing history, for example, information about your navigation through our Services, your browsing history and elements of our Services you use most often.
- Demographic information, such as your country and preferred language.
- Video surveillance data, if you visit or work in our offices or attend any our event.
- Images and/or photos, if you visit or work in our offices or attend any event which we sponsor or organise.
- Identity documents, such as copies of passports, driving licences, other identity documents issued by state authorities, etc. if you submit a request for the rights of the data subject, attend an event, etc.
- Special categories of personal data, for example, information about health/disability or religion related to use or access to our Services or events (for example, information about health/disability related to your access to our offices and use of them), or attendance at our events, religion information related to dietary requirements for attending events or meetings, etc.
- Identifiers, such as unique identification numbers, cookie identifiers, account numbers, social security numbers, national identifiers, etc.
- Further to the above mentioned personal information, additional personal information may be obtained from publicly available sources, such as personal information:
  - initially accessible to the public, usually via the Internet;
  - if the Company has reasonable grounds to believe that information has become legally available to the wide audience: from a data subject (or a consumer, or an individual to whom personal information relates), widely distributed mass media, or a person to whom the data subject has disclosed personal information (provided that the Company does not know that the data subject has limited information for a certain audience);
  - legally provided from records, databases and/or systems of government agencies, departments, divisions or other operating units in electronic, paper or any other form (for example, personal information found in: (i) sanctions lists or watch lists; (ii) law enforcement, judicial, regulatory or other governmental websites and databases; political websites and publications, such as websites of parliaments, local authorities or individual politicians; authoritative mass media and publications; sources of information published by the person themselves, for example, on their website, blog or in any social media application) (iii) publicly available source data may also include or disclose, expressly or implicitly, information about age/date of birth, race, ethnic origin, political views, religious or philosophical beliefs, trade union membership, genetic data, health data, sexual life, sexual orientation, crime data or family circumstances (e.g. family status, dependents, etc.), websites of local authorities or individual politicians; (iv) authoritative mass media and publications; and (v) sources of information published by the person themselves, for example, on their website, blog or in any social network application. Publicly available source data may also include or disclose, expressly or implicitly, information about age/date of birth, race, ethnic origin, political views, religious or philosophical beliefs, trade union membership, genetic data, health data, sexual life, sexual orientation, crime data or family circumstances (for example, family status, dependents, etc.), websites of local authorities or individual politicians.

#### **4. Intended Use of Personal Information**

Personal information may be processed on several legal grounds. The Company processes personal information on the following grounds:

- it is required to fulfil a contract: if there is a contract, we will process your personal information to fulfil this contract (i.e. to provide you with the Services);
- it is in our legitimate interests or the legitimate interests of third parties: provision of the Services which the Company is contractually obligated to provide to a third party;
- substantial public interest based on the applicable law (for example, to prevent and identify illegal activities (e.g., money laundering, terrorism, fraud and/or other criminal activity));

- when you give your consent (for example, you subscribe to receive, on behalf of the Company, marketing and advertising messages about tenders held by the Company or on behalf of the Company);
- to comply with a legal obligation (for example, to respond to an order of the court or regulatory authority; to comply with legal and regulatory requirements of jurisdictions in which we operate (including those related to bribery and corruption, money laundering and sanctions; exchange of personal information with external organisations (e.g., the police, tax authorities or other state authorities or government law enforcement agencies)).

When we process personal information in limited circumstances, we usually do so when:

- it is required due to the employee's obligations;
  - personal information is publicly available;
  - it is necessary for the establishment, exercise or defence of legal claims or whenever courts act in their judicial capacity;
  - processing is required for reasons of significant public interest, based on the applicable law.
- You can contact us for further information about legal grounds on which we rely in relation to any particular processing of your personal information.

## 5. Legal Rights of Use

The Company uses personal information for a number of legitimate interests:

- to set up and administer an account and use the Services (including for the purposes of accessing credentials, providing technical and client support and training, identity authentication and performing actions for authentication, facilitating and processing of transactions, providing suggestions and recommendations related to our Services (including provision of the Services), and send important information about the account, subscription and the Services).
  - to manage relationships in the "Subject– Company - Third Party Providers" chain (for example, to send invoices).
    - to understand models, preferences and interests of clients and improve the Services.
    - to process requests and complaints.
    - to communicate with clients for participation, as well as conducting and managing events, webinars, seminars, meetings and/or other related meetings or similar events.
    - to hold or manage tenders, drawings, promotional events or prize draws in which the client participates.
    - to conduct inspections, investigations and law enforcement activities in relation to companies listed on our markets, their officials, consultants.
    - to provide and offer tailored content such as news, researches, reports and business information. We analyse the way you use our Services to offer you features or the Services, which we think will also interest you, and to make our Services more user-friendly.
    - to personalise your interaction with our Services. We may store information about your browsing and usage to make your searches on our Services more relevant and use this information to target advertising at you on our websites and applications on the Internet.
    - to contact you for surveys, other research activities, as well as to analyse data collected for market research purposes, including, but not limited to those related to creation and improvement of our Services.
    - to display information that you decided to publish, share, upload, or make available for chat rooms, messaging services and community and event forums (including community and event profiles).
    - to provide any third party who made our Services available to you (for example, your employer or our subscriber) with information about the use of the Services.
    - for internal researches and projects, as well as to improve, test and expand capabilities and functions of our Services.
    - to provide you with marketing services.
    - to comply with our internal and external audit requirements, including our information security obligations.
      - for statutory reporting, supervision and cooperation.
      - to ensure compliance with our terms.
      - to protect our rights, confidentiality, security, networks, systems and property or the rights of others, including, but not limited to identity authentication in our premises (for example, collecting an identity document and related information) and monitoring of our premises for security and protection (for example, video surveillance).
    - to (i) register and manage relationships with clients/buyers, providers/service providers, business partners, professional consultants and/or any other counterparties; to (ii) negotiate and complete and/or participate in any sales, merger, acquisition, restructuring, joint venture, concession, transfer or other alienation of all or any part of our business, assets or any similar transaction(s); and to (iii) appoint and occasionally check any persons being owners, shareholders, members, managers, directors, officers and/or any other persons in

superior positions, with leadership roles or management responsibilities in relation to or with the Company and in this respect.

- to prevent, detect or investigate a crime or other violation of a law or requirement, to prevent losses or fraud.
- to create, update, supplement and manage content databases available to our clients in connection with our Services.
- to comply with requests from courts, law enforcement agencies, regulatory agencies and other state authorities, including those beyond your country of residence.
- to exercise our rights, defend against claims and comply with laws and regulations applicable to us or third parties which we cooperate with.

When we rely on legitimate interests as legal grounds for processing your personal information, we balance these interests and your interests, fundamental rights and freedoms.

## 6. Rights of Personal Information Subjects

According to the laws of the United Kingdom, Europe and other countries, the personal information subject may be entitled to access information and ask the Company to correct, erase or restrict the use of personal information. The subject has the right to object to using personal information, request to transfer personal information that the subject provided to the Company, and revoke consent to the use of personal information.

According to the laws of the United Kingdom and Europe, subjects have the following rights, and the subject may have similar rights under the laws of other countries.

**Right of access by the subject:** the right to make a written request for detailed information about personal information and a copy of personal information.

**Right to correction:** the right to correct or erase inaccurate information about the subject, if:

- accuracy of personal data is disputed;
- the processing is illegal, but the subject objects to erasure of personal data;
- The Company no longer requires personal data, but it is still necessary for the establishment, exercise or defence of legal claims.

**Right to erasure ("the right to be forgotten"):** the right to delete certain personal data about the subject.

**Right to restriction of processing:** the right to demand that personal information is used only for limited purposes.

**Right to refuse marketing mailings:** the right to demand to restrict receiving of marketing messages from the Company, which may relate to a certain type of marketing messages or to all marketing messages.

**Right to object:** the right to object to processing of personal information in cases where processing is based on performing a task of the public interest, or if the Company has indicated that the processing is necessary for legitimate interests of the Company or third parties.

**Right to data portability:** the right to request personal information, which the subject has provided to the Company, for transfer to the subject or to a third party in a machine-readable format.

**Right to withdraw consent:** the right to withdraw any consent that the subject has previously given to the Company for the processing of personal information. If the subject withdraws their consent, this will not affect lawfulness of the use of personal information by the Company before the withdrawal.

These rights are not absolute and do not always apply in all cases.

In response to the subject's request, the Company has the right to request additional information to confirm the subject's identity, if necessary, and provide information that will help the Company understand the subject's request in a better way.

## 7. Personal Information Retention Period

The Company stores your information in accordance with applicable record retention schedules/policies. These schedules/policies may be specific to the company and/or the Service. Our record storage process is based on a classification scheme consisting of business functions, record classes and record types.

We calculate retention periods for personal information according to the following criteria:

- time required to achieve the purposes for which we collected personal information.
- when you or your employer (or another subscriber providing you with access to our Services) stop using our Services.
- the period of time reasonable for keeping records to demonstrate that we have fulfilled our duties and obligations.
- any period of limitation during which claims may be filed.
- any retention periods prescribed by law or recommended by regulatory authorities, professional organisations or associations.
- existence of any relevant investigations.

## **8. Protection of Personal Information**

Our Company takes the security of personal information seriously, and we use appropriate technology, security measures and procedures to protect personal information (including administrative, technical and physical security measures) according to the level of risk and the Service provided.

We have established a cybersecurity unit, which is responsible for implementing secure data processing practices within the Company.

Our information security policies and procedures are closely related to generally accepted international standards and are regularly reviewed and updated as necessary to comply with the confidentiality of personal information which we process, our business needs, changes in technology and regulatory requirements. In spite of cyber security measures, data transmission over the Internet cannot always guarantee hundred per cent (100%) security. We cannot and do not guarantee the security of personal information that you transfer, and all such transfers are carried out at your own risk.

## **9. Transfer of Personal Information**

We transfer personal information to various parties and persons, including our business partners and third party service providers, a party or a person providing you with access to our Services (other than you). Our third party service providers are not allowed to share or use personal information provided to them by us for any purpose other than providing services to us. In connection with the exchange of personal information, additional notification may be provided and consent may be obtained, as required by the applicable law.

We transfer your information for the purposes set out in this Provision to the following categories of recipients:

- a person providing you with access to our Services (for example, your employer or our subscriber).
- business partners with whom we provide the Services; business partners with whom we participate in joint sales of products or services; business partners for whom we provide content or hold events, conferences and seminars.
- third parties which help us provide the Services or act on our behalf (for example, providers, service providers, subcontractors, processors).
- our clients who buy or use our Services, or service providers or sellers of our clients in order to facilitate the use of our Services by our clients.
- to third parties to whom we must or have the right to disclose your personal information by law (for example, government agencies, law enforcement agencies, courts and other state authorities).
- to third parties for participation or participation in any sales, merger, acquisition, restructuring, joint venture, concession, transfer or other alienation of all or any part of our business, assets or shares (as well as due to any bankruptcy or similar proceedings) or other similar transactions, and in this case we may disclose your personal data to potential buyers, sellers, consultants or partners, and your data may be transferred to an asset when selling a business.
- third parties, when it is reasonably necessary to protect our rights, users, systems and the Services (for example, legal advisers and information security specialists).
- any person who you asked us to share information with (for example, if you upload information to a public forum, it becomes publicly available).

## **10. International Transfers**

We are an international company, and your personal information may be stored and processed beyond your country, including countries that may not provide the same level of protection of your personal information as your country. We have measures to ensure that personal information transferred internationally is subject to appropriate security measures in accordance with data protection laws. They often include contractual guarantees. Contact us for further information about these guarantees (including copies, if necessary).

The Company has networks, databases, servers, systems, domestic and international support services. We cooperate with third parties such as cloud hosting services, providers and technical support services located around the world to meet the needs of our business, employees and clients. We take appropriate steps to ensure processing, protection and transfer of personal information in accordance with the applicable law. In some cases, we may need to disclose or transfer your personal information internally or to third parties beyond your country, including countries that are not deemed appropriate for data protection purposes by data protection regulators/supervisors, including, but not limited to the United Kingdom or the European Commission.

Areas, where these recipients are located, will change from time to time, but they include the USA, Canada, Europe, Asia, as well as all other countries.

When transferring personal information internationally, we take security measures in accordance with the applicable law.

## **11. Marketing**

We send to you marketing messages and event messages via various platforms such as e-mail, phone, text messages, direct mail and online. If it is required by law, we will ask you to provide explicit consent to receive

marketing materials from us. If we send you a marketing message, it will contain instructions how to opt out of receiving such messages in the future.

It is important for us to take into account your marketing preferences. You have the right to refuse to receive direct marketing and targeted online advertising.

We use tools and technologies to provide or display targeted marketing and advertising content on or through our Services, which may include use of cookies and related technologies, IP address tracking and/or assignment and tracking of unique identification numbers.

When we send you marketing messages, we use e-mail tracking technology, including, but not limited to dynamic links and image files, to verify your participation, as well as effectiveness and relevance of the messages.

We use tools and technologies to distinguish between known and unknown users of our Services, as well as to record, view, track and analyse participation and use of our Services (for example, recording or tracking hovering, clicks, keyword searches, personal information entered into forms, etc.)).

We may also be engaged in marketing activities on third party platforms, including, but not limited to social media platforms; however, such activities are regulated by confidentiality statements and terms and conditions applicable to such third party platforms.

In cases when we are engaged in direct marketing, including, but not limited to direct marketing by email, regular mail and phone/mobile phone, we provide individuals with the opportunity to opt out of such marketing activities or unsubscribe from them. You can use the "Contact Us" function of a specific Service; you can use special opt-out or unsubscribe mechanisms available to you in connection with a certain type of marketing communication; you can discuss this with your contact person in the Company or contact us using the contact information presented on the website on the Internet.

Even if you opt out of receiving marketing messages, we still may send you service messages or important transaction information related to your accounts, subscriptions and applicable products (for purposes such as client support).

## **12. Cookies**

The Company uses cookies on the Company's websites on the Internet.

Cookies are small text files placed on the hardware of the subject (personal computer or mobile device) by websites that the subject visits. They are widely used to make websites operate or operate more efficiently, as well as to provide web services and functions to users (for example, they allow you to improve your operation with the website and allow the website to remember actions and preferences (such as user name, language, font size and other display parameters) for a certain period of time, so the user does not need to enter them again whenever the user returns to the website or navigates from one page to another).

The Company's website uses both persistent and session cookies.

A persistent cookie consists of a text file, sent by a web server to a web browser, which allows the Company to collect and analyse (on an anonymous basis) traffic and website usage, control the system and improve operational performance, for example, store your preferences to improve your subsequent visit experience. When closing the browser, it will not be deleted automatically, but saved by the browser and remain valid until the expiry date (unless the user deletes it before the expiry date).

A session cookie is necessary to ensure proper operation of the Website and is used to manage registration and access to reserved functions. It is temporarily saved for the browsing session and expires at the end of the user's session when the web browser is closed.