

Appendix 3  
to the Regulation on  
the processing of personal data of  
the user of the corporate website  
of RUSNANO JSC Appendix 2  
to the order of JSC RUSNANO  
and RUSNANO  
MANAGEMENT COMPANY,  
LLC» from 16.03.2020 № 15 / 28

Last updated March 2020

## **Privacy Policy<sup>1</sup> of Joint Stock Company RUSNANO and Management company RUSNANO LLC**

### **Regulations on processing personal data of Joint Stock Company RUSNANO site user**

Joint Stock Company RUSNANO and LLC Management company RUSNANO (hereinafter collectively “Rusnano” or “we”) respect your privacy and are committed to protecting your personal data through our Privacy Policy.

Rusnano protects and processes your personal data in accordance with the laws of the Russian Federation.

The Privacy Policy describes what the type of information we may collect, how we use and store your personal information and provide data security, what kind of technologies we use on our Website, what third parties may receive your personal data.

Please take the time to read our Privacy Policy in order to learn more about how we collect, use and store information when you use our Website or contact us.

The Privacy Policy applies to the personal data of our Website users.

Rusnano may change this policy from time to time by updating this page. Please visit this page regularly to learn about our current Privacy Policy to ensure that you are agree with our changes.

Before processing your personal data, you give us your consent (permission) to personal data processing that you may withdraw at any time.

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<sup>1</sup> Текст разработан в соответствии с Положением об обработке персональных данных пользователя корпоративного сайта АО «РОСНАНО» (русскоязычная версия), адаптирован для оптимизации восприятия содержательной информации гражданами, не владеющими русским языком, с сохранением существенной информации, содержащейся в русскоязычной версии.

If you do not agree with our policy and procedures, you should not use our Website. By using our Website, you agree to our Privacy Policy.

#### Definitions

**‘Personal data’** means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, location data, email addresses and another online identifier or to one or more factors etc.

**‘Controller’** is LLC MC RUSNANO and/or JSC RUSNANO that determines the purposes and means of the processing of personal data of Website Users; where the purposes and means of such processing are determined by the laws of the Russian Federation.

**‘Processing’** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**‘Consent’** means any freely given, specific, informed and unambiguous indication of data subject’s wishes by which he or she, by a statement or by a clear affirmation action, signifies agreement to the processing of personal data relating to him or her.

**‘Withdraw a consent to personal data processing’** means your message via e-mail at report@rusnano.com in order to stop processing personal data and delete your personal information.

**‘Web service’** is a software system identified by a unique web-address with standardized interfaces; it means also Rusnano website services (‘E-mail subscriptions’, ‘Personal Account of the Applicant’, ‘Contact us’, ‘Compliance hotline’, ‘Feedback’ etc.).

**‘IP-address’** is a number that is assigned to your computer automatically when you use the Internet. IP addresses may provide details of your domain name and general location.

**‘Cookies’** is a bit of data sent by a website through the browser to the computer of the user visiting the site, and enables the site to return the results the browser expects. For further information, please read the section below headed “Cookies and similar technologies”.

**‘Hyperlink’** or simply a link is a reference to data that the user can follow by clicking or tapping. A hyperlink points to a whole document or to a specific element within a document.

**‘Favicon’** or simply an icon is a file containing one or more small icons, associated with a particular website or web page.

#### *Use of our Website*

This Policy applies to information we collect:

- On our Website;

- In e-mail address or phone (telephone number or mobile number) and other electronic messages between you and our Website;
- In personal page – Personal Account of the Applicant;
- When you interact with us through other digital forms, for example subscriptions, that include links to this Policy.

Information collected via technology of our Website:

Our Website collects information from you, including IP-address, domain name, browser type and/or a date/time stamp for your visit. Our Website collects this information automatically through cookies, when you visit our Website, and stores it in log files. We use this information for statistic purposes exclusively.

We use cookies and other technologies on our website for following objectives:

- Assisting in registration, login, and your ability to provide feedback;
- Assisting you in navigation on our website;
- Analyzing your use of our Website pages and links.
- Improve our Website for our users.

When you use our Website, you give us information about yourself:

- When you fill in forms on our Website;
- When you use our Website;
- When you correspond with us by e-mail or phone;
- When you subscribe to our topics and blogs, download white papers, participate in social media functions linked with our Website;
- When you download the Investor Questionnaire, fill it out and send it by e-mail to us (only for our future partners and co-investors).

We collect the following information:

- First name and last name;
- E-mail address;
- Phone (telephone number or mobile number).
- For the aim of Investor Questionnaire: first name and last name, Individual Taxpayer Identification Number (ITIN), date of birth, place of birth (country and city or town), citizenship, ID or passport (series, number, date of issue, country of issue), mailing address and current residence address, country (territory) of Tax residency.

We may use your Personal Data:

- to establish and maintain responsible relations with you;
- to provide ongoing Rusnano service. For example, when you apply for a subscription to our topics (World nanotechnology news, Rusnano projects etc.);
- to inform you of publications and those issues that might be of interest to you;
- to send you service messages about your subscription or account registration (Personal Account of the Applicant), for example if you have clicked a password reset link. This could be done by electronic mail.

- to communicate with you;
- to respond to your questions, requests, messages or complaints;
- to improve the design and style of our Website;
- to evaluate and improve the user experience on Website;
- to meet legal and regulatory requirements. For example, we may collect Personal Data from you to satisfy government regulations (tax purposes for FATCA and CRS).

### *Third Party and Affiliated Links*

Our Website contains external links of third party websites and affiliates websites. By clicking on those links you may allow third parties and affiliates to collect data about yourself.

We do not control these third party websites, affiliates websites, and are not responsible for their privacy statements, security practices and content of or information gathered by these third parties and affiliates.

Please take the time to read their privacy notices or policies before providing them with your personal information.

### *Data Storage and Data Retention*

We store your personal information in Russian Federation.

Our office headquarters are based in Moscow and our main data centre is located in Moscow. For further information, please read the section below called Information about us.

We may transfer the information that we hold about you to the office outside Russia for purpose of interaction or cooperation with you. We operate in the United States of America. When we transfer your data to other countries, we will protect the data as described in this Privacy Policy and comply with applicable legal requirements providing adequate protection for the transfer of data to countries outside Russian Federation. You may request more information about the safeguards that we have put in place in respect of transfers of personal data by contacting us at [report@rusnano.com](mailto:report@rusnano.com) or as described in the section Information about us below.

Your personal data will not be kept for longer than is necessary to fulfil the specific purposes. We keep your personal information for as long as we provide services to you, as long as we are addressing a concern, question, request or complaint you have sent to us, as applicable to our interactions with you.

If we have a contract or other agreement with you, we will follow obligations of that agreement.

We may keep data longer if we have a legal obligation to maintain records for compliance or other obligations.

Any personally identifiable information such as your name and address will be deleted after a defined period as described above. The rest of the data is therefore anonymous and will be used to analyze general market and Website trends (for example, site traffic) but without an identifiable personal information.

The user's personal data shall be deleted within 30 (thirty) days from the date of receipt of the relevant notice or withdraw of the user excluding cases when we have certain legislative requirements.

### *Personal Information Disclosure*

In general, Rusnano does not disclose your personal information to third parties except as provided in this Privacy Policy.

We may disclose information, including your Personal Data:

- to contracts, service providers and other third parties that we use to support our business and who are bound by contractual obligations to keep personal information and use it only for the purposes for which we disclose it to them;
- to third parties, such as e-mail service providers, cloud storage-hosting providers and our Website service provider<sup>2</sup>.

Our contracts with these service providers prohibit them from using or sharing with others, for other purposes than as directed by us, the information that we provide to them.

Rusnano may disclose your Personal Data for internal objectives, for example to Investment Teams, Science and Technology experts, Head of investor relations, Press-office and Compliance Officer.

We disclose Personal information only with your consent to personal data processing.

We may disclose aggregated and non-personally users' statistics to other third parties.

Rusnano assumes no responsibility or liability for any third-party policies or the actions of third parties.

### *Data Security*

Rusnano uses technical and organizational security systems to protect user information, including Personal Data against unauthorized access or processing, use, alteration, disclosure and against loss, destruction or damage.

Rusnano has the proper IDAM controls (Identity and Access Management) in order to limit access to personal data for authorized employees.

Although we have security measures to protect Personal Data, we recommend maintaining access codes and/or PINs in a confidential manner. The security of your personal information also depends on you.

We are not responsible for circumvention of security measures.

### *Your rights*

You have a right to receive a copy, to add, correct, change, update or delete any your personal information that we hold about you. If you think the data we hold on you is incorrect, tell us so we can put it right.

You have a right to unsubscribe at any time by contacting us using the details at the end of this Policy.

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<sup>2</sup> Look at a [consent to personal data processing form](#)

If we obtained your consent to use your personal data, you can withdraw your consent at any time.

Rusnano will make reasonable efforts to provide you access to any of your personal information after your request. Please, for this objective contact us at [report@rusnano.com](mailto:report@rusnano.com).

We may require certain information from you in order to understand the nature of your request, to confirm your identity and to ensure your right to access the information. This is proper security measure to assure that personal information is not disclosed to any person who has no right to receive it.

If we are not able to provide you access to your information, we will explain why we cannot do so. We will respond to your request within one month.

You have the right to request that we delete your data. We will do so, if we do not have a compelling reason for keeping it. After your information is deleted, residual information may remain in our archives but this information will not be used for commercial purposes.

#### *Your California Privacy Rights*

Our Privacy Policy covers follow information how we collect, use, and disclosure and store your personal information. You may read information about it in the sections above headed “Use of our Website”, “Personal Information Disclosure”, “Data Security”, “Data Storage and Data Retention”.

We do not ask users about their location through our Website.

We do not use tracking tools. Our Site does not track its users over time and across third party websites and does not respond to Do Not Track (DNT) signals.

If you are a California resident under the age of 18, and you are a registered user of our services, for example, E-mail subscriptions, you may request that we remove information you posted on our service by submitting a written request to us.

This section is not complete, exhaustive statement of your right. You can learn more by reviewing California Online Private Protect Act.

If you have any question about our Privacy Policy, please contact us via e-mail at [report@rusnano.com](mailto:report@rusnano.com) and indicate in the subject line “California Privacy Rights”.

You can also write to us at the address at the bottom of the page. We reserve the right not to respond to requests made other than as provided in this section.

#### *Information about us*

Our registered office is at 10 A, 60-letiya Ochyabrya prospect, Moscow, 117036

If you have any question about our Privacy Policy or how we collect and use your personal information, please contact us via e-mail at [report@rusnano.com](mailto:report@rusnano.com)

#### *Cookies and similar technologies*

Cookies are text files containing small amounts of information, which your computer or mobile device downloads when you visit our Website. In this case, cookies may be installed automatically when pages of our Website are loaded or as a result of your request that cannot be completed without using them. These are session cookies that expire on closing the browser. These cookies are necessary for

our Website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you, which amount to a request for services, such as setting your privacy preferences, logging in, or filling in forms. You can set your browser to block or alert you about these cookies, but some parts of our Website will not then work. These cookies do not store any personally identifiable information.

We use performance cookies that collect information about using our Website and if you receive error messages from web pages. These cookies do not collect your personal information. We use these cookies only to improve our Website and receive statistical information, including counting page visitors, dwell time, bounce rates, technologies used to access our Website, and page load speeds. All information these cookies collect is aggregated and therefore anonymous. If you do not allow these cookies, we will not know when you have visited our site, and will not be able to monitor its performance.

We use cookies that help you to watch a video of our Website. These cookies collect anonym information and they cannot track your browsing activity on other websites. These cookies support our Website functionality.

We work with third parties to place cookies on our Website. We have social network buttons on our Website in order to you may share our information. We do not use social sharing cookies. The social network services usually set cookies, which enable users share information at their personal pages social networks.

We use the following Yandex and Google services: Yandex. Metrix and Google. Analytics that collect information anonymously and report Website trends to us without identifying individual visitors. We also use Yandex Search Console and Google Search Console to help us understand how visitors found out our Website and to improve our search optimisation. We use Yandex and Google analytics tools only for statistic purposes.

If you do not want your information to be collected using these technologies, you can disable cookies in your web browser settings.