



PERSONAL DATA PROCESSING POLICY

April 11, 2025

JSC "Bureau Veritas Rus" and JSC "Bureau Veritas Certification Rus" (hereinafter "Bureau Veritas", "we", "us", "our") recognizes the importance of effective and meaningful protection of Personal Data. Ensuring human rights and freedoms in the processing of Personal Data, including the rights to privacy and to personal and family secrecy, is one of Bureau Veritas's priorities.

This Personal Data Processing Policy (hereinafter the "Policy") has been developed in accordance with Federal Law No. 152-FZ of 27.07.2006 "On Personal Data", taking into account the requirements of the General Data Protection Regulation (GDPR), the Constitution of the Russian Federation, international treaties of the Russian Federation, federal laws and other regulatory legal acts of the Russian Federation in the field of Personal Data.

This Policy is intended to inform you about the types of Personal Data we might collect or store about you, how we use it, who we share it with, how we protect it and keep it secure, as well as about your rights regarding Personal Data.

We apply this Policy to all potential clients, customers, suppliers, partners, subcontractors, candidates and, in general, everyone who is in contact with us (hereinafter "you").

"Personal Data" means any information or pieces of information that could identify you directly or indirectly. This means that Personal Data includes things like first name and last name, e-mail address, home address, bank details, IP addresses, etc.

"Personal Data processing" means any operation or set of operations which is performed on Personal Data, whether or not by automated means, such as collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion and destruction of Personal Data.

1. What are the principles for processing Personal Data?

When processing Personal Data, we limit ourselves to achieving specific, predefined and lawful purposes and do not allow processing of Personal Data that is incompatible with the purposes of its collection. Only Personal Data that corresponds to the purposes of processing is processed.

We strictly control that the content and volume of the Personal Data processed correspond to the stated purposes of processing and that the Personal Data processed is not excessive in relation to those purposes.

We undertake to:

- collect and process your Personal Data lawfully and fairly;
- collect your Personal Data only for specific, explicit and lawful purposes and not process Personal Data in a manner that is incompatible with those purposes;
- process only Personal Data that corresponds to the purposes of processing;
- ensure the accuracy and sufficiency of Personal Data and, where necessary, its relevance in relation to the purposes of processing;
- store your Personal Data no longer than required by the purposes of processing, unless the storage period is established by federal law or by an agreement to which you are a party, beneficiary or guarantor;
- destroy or depersonalize your Personal Data upon achievement of the purposes of processing or if the need to achieve those purposes is lost, unless otherwise provided by federal law.



2. What Personal Data do we collect, why and how do we use it?

In order for you to have the clearest view on how and which of your Personal Data we process, we have prepared a table in which you can find information depending on the situation / purpose of the data collection.

- 1) Column 1 – In what situation (in what case) do we collect your Personal Data?
- 2) Column 2 – What types of your Personal Data are we entitled to collect and store?
- 3) Column 3 – How and why may we use it? This column explains what we do with your Personal Data and the purposes of collection.
- 4) Column 4 – What is the legal basis for processing your Personal Data? This column explains the reason why we may use your Personal Data.

When we collect data through forms, including electronic forms, we will indicate the mandatory fields via asterisks. In certain situations, failure to provide data marked with an asterisk, or your objection to its processing, may affect your access to services or a job offer.

When you receive our services or visit our website, you may transmit Personal Data in various ways, and we may receive it in various ways. Sometimes you provide us with your Personal Data directly (for example, when you contact us through our website, request a commercial offer or order one of our services), sometimes we collect it indirectly (for example, using cookies to understand how you use our website), and sometimes we receive your data from other third parties, including other companies of the Bureau Veritas group.

Situation in which your Personal Data is collected	What types of your Personal Data may we collect and store?	How and why may we use it?	What is our legal basis for processing your Personal Data?
Ordering services from Bureau Veritas Information collected when you order our services	• First and last name • E-mail address • Phone number • Registered and mail addresses • Contract data (service description, contract number, service history, etc.) • Bank details	In order to: • Send you a commercial offer • Arrange the provision of the service • Agree on payment • Negotiate / correspond regarding the agreement of the service • Settle possible disputes • Collect statistics	Conclusion of a contract
Providing services to you Information collected during the provision of services	• First and last name • E-mail address • Phone number • Data related to the commercial relationship: information on signed services, their duration, correspondence with the client, etc. • Identification data allowing access to the electronic resources needed to receive the service	In order to: • Provide you with the required services • Provide access to resources necessary for receiving the service • Maintain contact during the provision of the service • Respond to questions in a timely manner during the provision of the service • Settle disputes arising in connection with the provision of the service	Performance of a contract
Purchasing goods or services from you Information collected	• First and last name • E-mail address • Postal address • Company name	In order to: • Agree on the terms of purchase of goods/services • Coordinate contracts, orders,	Performance of a contract



Situation in which your Personal Data is collected	What types of your Personal Data may we collect and store?	How and why may we use it?	What is our legal basis for processing your Personal Data?
when purchasing goods or services from you	• Phone number • Bank details	deliveries, invoices and, in general, the contractual relationship with you • Settle disputes arising in connection with the purchase of goods/services	
Bureau Veritas news and advertising mailing	• First and last name • E-mail address • Company name • Phone number	In order to send you advertising messages (if you have requested this). In order to remove you from the mailing list (if you have asked not to be contacted). In order to conduct analytics and collect statistics for the purpose of improving the marketing strategy, assessing its effectiveness and understanding your needs.	Obtaining consent Fulfilment of legal obligations Legitimate interest
Viewing the Bureau Veritas web page Information collected using cookies* or similar technologies while viewing the Bureau Veritas website * Cookies are small text files saved on your device (computer, tablet or mobile phone) when you are online.	Data related to your use of our site: • Where you came from • Pages you viewed • Duration of your visit Technical information: • IP address • Browser information • Device information	In order to ensure the proper functioning of our site: • correct content, • personalization of the interface by language, • taking into account your device parameters, including screen resolution, • improving the operation of the site, for example, by testing new ideas. In order to ensure the reliability and security of the website and protect you from fraud. In order to keep statistics for the purpose of: • improving our offers • finding out how you discovered our site In order to tailor services to your needs: • send you messages in line with your interests • customize the site to your interests	Legitimate interest Obtaining consent
Inquiries Information collected when you ask a question about our company or our services	• First and last name • E-mail address • Position • Company name • Phone number • Country, city • Other information you shared with us in connection with your inquiry	In order to answer your question. In order to forward your question to the appropriate department. In order to keep statistics for the purpose of improving the quality of our services.	Performance of a contract Consent Legitimate interest
Job application at Bureau Veritas	• First and last name • Contact information	In order to find a suitable candidate (you can submit your application on	Legitimate interest



Situation in which your Personal Data is collected	What types of your Personal Data may we collect and store?	How and why may we use it?	What is our legal basis for processing your Personal Data?
Information collected when you apply for a job in Bureau Veritas	• Resume (qualifications, work experience)	our company's website, spontaneously or in response to a job offer; we also use online job search websites (HH.ru, SuperJob, Avito) In order to create a CV database To pre-select candidates: sorting and storing resumes in paper and electronic form.	Consent Legitimate interest
	• First and last name • Contact information • Resume (qualifications, work experience) • Interview notes (information collected during a telephone, video or in-person interview)	In order to contact candidates and assess their suitability for the job and their professional skills.	Legitimate interest Preparation for concluding a contract

Bureau Veritas processes Personal Data only for the purposes described in this Policy and of which you have been informed.

3. Notices and consents

In some cases, as indicated in the table above, we ask for your consent before collecting, using or disclosing your Personal Data, in particular when:

- you want to subscribe to our mailing list or receive commercial messages;
- we use cookies or technologies similar to cookies and/or collect information about the device you use to access our sites;
- you ask questions about our services;
- you want to add your resume to our job seekers database.

If we need your prior consent, you will be informed of this at the time your Personal Data is collected. You may withdraw your consent at any time by using the opt-out mechanism provided and indicated at the time your Personal Data is collected, or by contacting us using the contact details given in the "Contacts" section of this website.

4. Who will have access to your Personal Data?

Your Personal Data may be accessible to:

- Bureau Veritas employees authorized to do so by virtue of their job duties — solely within the scope of their authority, to perform their job duties or to fulfil your request for services, or if required by a contract between you and Bureau Veritas, or with your consent (in particular, for marketing purposes), or to protect the interests and rights of Bureau Veritas.
- authorized service providers who provide certain services on our behalf (marketing services, hosting services, database maintenance, etc.) — to the extent necessary to provide such services, without the



right to use your Personal Data for any other purposes. Under their contract with Bureau Veritas, service providers must ensure the same level of security and confidentiality for Personal Data that Bureau Veritas is required to ensure, and must comply with applicable Personal Data protection laws and regulations.

Except as listed above, your Personal Data may be transferred to a third party:

- to protect the rights, property or safety of Bureau Veritas or our employees;
- in the event of reorganization — to the legal successor;
- at the request of a court, enforcement authorities or law enforcement agencies; or
- for other purposes provided for by applicable law, or with your prior consent.

5. Where do we store your Personal Data?

All collected Personal Data, including data received through the information and telecommunications network "Internet", is stored in the territory of the Russian Federation and may be transferred outside the Russian Federation only with your consent to cross-border transfer.

6. How long is your Personal Data retained?

We will keep your Personal no longer than required by the purposes for which it was collected (typically, the length of the contract). We may, however, keep your data for a longer period of time, if the storage period is established by federal law or by a contract to which you are a party. Upon achievement of the purposes of processing, or if the need to achieve those purposes is lost, Personal Data will be destroyed or depersonalized.

The following criteria are used to determine the storage period of Personal Data:

- If you subscribe order a service, we store your Personal Data for the duration of our contractual relationship and thereafter in accordance with the statute of limitations;
- If you contact us with an inquiry, we store your Personal Data for the period necessary to process your inquiry;
- If you have consented to direct marketing, we store your Personal Data until you unsubscribe or require us to delete it, or after a period of inactivity (no active interaction with us) determined in accordance with applicable rules;
- With regard to cookies sent from your computer or other device, we retain the information contained therein for as long as is necessary to process your request from that device;
- For candidates, we store your Personal Data in accordance with the applicable statute of limitations under local legislation.

7. How is your Personal Data protected?

We strive to ensure the security of your Personal Data and take all reasonable precautions for this purpose. We take all organizational and technical measures necessary and required by law to protect your Personal Data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of or access to Personal Data. The same requirements are established in contracts with service providers that process your Personal Data on our behalf.

8. Your rights

In accordance with applicable Personal Data protection laws and regulations, you have certain rights regarding your Personal Data, namely:



- **Right of access:** you have the right to receive, in an understandable and easily accessible form, information on how your Personal Data is processed. You also have the right to obtain (i) confirmation of whether or not your Personal Data is being processed and, if so, (ii) to receive that Personal Data and a copy of it.
- **Right to rectification:** you have the right to have inaccurate Personal Data corrected. You also have the right to have incomplete Personal Data completed, including by providing an additional statement.
- **Right to erasure ("right to be forgotten"):** in some cases, you have the right to have your Personal Data deleted. However, this right is not absolute, and Bureau Veritas may have legitimate grounds for retaining such Personal Data.
- **Right to restriction of processing:** in some cases, you have the right to have the processing of your Personal Data restricted.
- **Right to data portability:** you have the right to receive, in a structured, commonly used and machine-readable format, the Personal Data you have provided to Bureau Veritas and to transfer this data to another operator without hindrance from Bureau Veritas. This right applies only if the processing of your Personal Data is based on your consent or on a contract, and the processing is carried out by automated means.
- **Right to object to processing:** if Bureau Veritas processes Personal Data on the basis of Bureau Veritas's legitimate interest, you have the right to object to such processing at any time, on grounds relating to your particular situation. In some cases, Bureau Veritas may have compelling legitimate grounds that override your rights and freedoms for continuing the processing.
- **Right to revoke your consent to processing:** if Personal Data is processed on the basis of your consent, you may withdraw it at any time. Withdrawal of consent does not affect the lawfulness of processing carried out prior to the withdrawal.
- **Right to file a complaint:** if you believe that Bureau Veritas is processing your Personal Data in violation of the requirements of the law, you have the right to complaint about the actions or inaction of Bureau Veritas to the authorized body or through the court.
- **Right to give instructions concerning the use of your data after your death:** you have the right to give general instructions for all third parties and/or specific instructions to Bureau Veritas concerning the use of Personal Data after your death.

For further information on your rights and to exercise them, you may contact us through the channels indicated in the "Contacts" section. Note that we may require proof of your identity, before we process your request.