

# Personal Data Processing Policy of PJSC “Magnit”

## Purpose and scope:

This policy of PJSC “Magnit” (primary state registration number: 1032304945947; taxpayer identification number: 2309085638; address: 15/5 Solnechnaya Street, Krasnodar 350072 Russia) (hereinafter referred to as the “Operator”) on processing of personal data (hereinafter referred to as the “Policy”) has been prepared and approved in accordance with the requirements of the Federal Law No. 152-FZ “On Personal Data” dated 27.07.2006 (hereinafter referred to as the “Personal Data Law”) with the purpose of ensuring protection of human and civil rights during the processing of personal data, including the rights to personal and family privacy and protection of honor and good name, and defines the policy, arrangements, and conditions with regard to the processing of personal data and sets forth procedures aimed at preventing and discovering violations of the law of the Russian Federation and eliminating consequences of such violations related to the processing of personal data. Relations involving the processing of personal data are regulated by the Policy, the Operator’s other official documents, and the current law of the Russian Federation.

## Abbreviations, basic definitions, and terms:

**PD** means personal data.

**Automated processing of personal data** means the processing of personal data by means of computing.

**Blocking of personal data** means the temporary suspension of the processing of personal data (except for cases where processing is required to rectify personal data).

**Information Security Department (ISD)** means the Information Security Department of JSC “Tander,” tasked with ensuring compliance with information security requirements in relation to Magnit Group.

**Personal data information system (PDIS)** means personal data contained in databases in combination with the information technology and technical means used for processing such personal data.

**Processing of personal data** means any action (operation) or set of actions (operations) performed on personal data, whether or not by automated means, such as collection, recording, organization, accumulation, storage, rectification (update, alteration), retrieval, use, transfer (dissemination, provision, access), blocking, erasure, or destruction.

**Processor** means any person which processes personal data under a contract with the Operator, at the instruction of the Operator, and on behalf and/or for the benefit of the Operator. The Operator is liable to the data subject for the Processor’s actions or omissions. The Processor is liable to the Operator.

**Operator of personal data (Operator)** means a person which, alone or jointly with others, arranges for and/or performs the processing of personal data and determines the purposes of processing of personal data, composition of the personal data to be processed, and actions (operations) to be performed on personal data.

**Personal data** means any information relating to a directly or indirectly identified or identifiable natural person (data subject).

**Provision of personal data** means actions aimed at disclosure of personal data to a certain person or group of persons.

**Dissemination of personal data** means actions aimed at disclosure of personal data to an indefinite number of persons.

**Roskomnadzor** means the Federal Service for Supervision of Communications, Information Technology, and Mass Media.

**Data subject** means a natural person whose personal data are processed.

**Cross-border transfer of personal data** means the transfer of personal data to a foreign government body, foreign natural person, or foreign legal person located in a foreign country.

**Destruction of personal data** means actions which make it impossible to restore the contents of personal data in a personal data information system and/or lead to the destruction of physical storage media containing personal data.

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## 1. General provisions.

1.1. The Policy defines the procedure for the processing and protection of personal data of various categories of data subjects, except employees, dismissed employees, and employees' relatives<sup>1</sup>, by the Operator.

1.2. The Policy may be altered by the Operator. The new version of the Policy comes into effect immediately upon its publication on the Operator's Internet resource at <https://magnit.com/ru/>.

1.3. By signing up to or visiting the Magnit Plus Website and/or mobile application, the User of the Website expresses their unreserved consent to the Policy and conditions of processing of their personal data described in the Policy. The Policy applies to the Operator's websites which receive data from Users and refer to the Policy. The Policy does not apply to the Operator's websites which do not contain the Policy or any reference to it, as well as to websites which have their own Data Processing Policies.

1.4. The Policy applies to relations involving the processing of personal data that the Operator entered into both before and after the approval of the Policy.

1.5. The Policy is freely accessible via the Internet on the Operator's Website at <https://magnit.com/ru/> and is a public document.

## 2. Purposes of collection of personal data by PJSC "Magnit."

2.1. The processing of personal data is limited to achievement of specific, pre-defined, and legal purposes. The processing of personal data which is not consistent with the purposes of collection of personal data is prohibited.

2.2. Only the personal data which are consistent with the purposes of their processing may be processed. In particular, the Operator may process personal data to achieve the purposes listed in Appendix 1.

2.3. The Operator may also process personal data for other purposes set forth in the approved List of Personal Data to be Processed by the Operator (hereinafter referred to as the "List of Personal Data").

2.4. For each processing purpose, the List of Personal data defines particularly, but not exclusively:

- the categories of the data subjects whose personal data are processed by the Operator;
- the categories of the personal data being processed;
- the legal basis for the processing of personal data;
- the means by which the personal data are processed;
- the time periods for the processing (storage) of personal data;
- the procedure for the destruction of personal data.

2.5. The List of Personal Data must be revised by the person designated as responsible for arranging the processing of personal data by the Operator at least once a year and from time to time as processes used for the processing of personal data are updated to ensure the accuracy, validity, and relevance of the personal data, including with regard to the purposes of processing of personal data.

2.6. In furtherance of the specified purposes, the Operator may enter personal data into information systems and store and process personal data by any means allowed by law. After the purposes of processing are achieved, or if there is no further need to achieve such purposes, the personal data being processed are to be destroyed, unless otherwise provided by law. If the data subject provides, upon their own initiative, additional personal data not required to achieve the purposes of processing of personal data, such data will be destroyed or blocked by the Operator immediately after the review of the request or any other interaction with the data subject.

2.7. The Operator collects Users' personal data on the Website during User signup and later when Users provide, upon their own initiative, additional information about themselves using the tools available on the Website, and may also receive Users' data from third parties.

## 3. Legal basis for processing of personal data.

3.1. The legal basis for the processing of personal data is the set of laws and regulations pursuant to and in accordance with which the Operator processes personal data, including:

- Council of Europe Convention for the Protection of Individuals with regard to Automated Processing of Personal Data dated January 28, 1981, as amended and approved by the Committee of Ministers of the Council of Europe on June 15, 1999,

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<sup>1</sup> Information regarding the processing of personal data of other categories of data subjects and/or for other purposes is communicated by the Operator to data subjects via other local regulations, including the Personal Data Processing Regulation, which are available at the Operator's offices or made available by the Operator in another manner.

ratified by the Federal Law of the Russian Federation No. 160-FZ "On Ratification of the Council of Europe Convention for the Protection of Individuals with regard to Automated Processing of Personal Data" dated December 19, 2005, within the limits defined by the aforementioned Federal Law;

- Constitution of the Russian Federation;
- Civil Code of the Russian Federation;
- Labor Code of the Russian Federation;
- Tax Code of the Russian Federation;
- Federal Law No. 208-FZ "On Joint-Stock Companies" dated December 26, 1995 (as revised on 30.11.2024);
- Federal Law No. 149-FZ "On Information, Information Technology, and Protection of Information" dated July 27, 2006;
- Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006;
- Decree of the President of the Russian Federation No. 188 "On Approval of the List of Confidential Information" dated March 6, 1997 (as revised on 13.07.2015);
- Regulation on Specifics of Non-Automated Personal Data Processing, approved by the Order of the Government of the Russian Federation No. 687 dated September 15, 2008;
- Order of the Government of the Russian Federation No. 1119 "On Approval of Requirements to Protection of Personal Data During Their Processing in Personal Data Information Systems" dated November 01, 2012;
- other laws and regulations governing relations connected to the Operator's activities.

3.2. In addition to the above, the following also serves as the legal basis for the processing of personal data:

- agreements entered into by and between the Operator and data subjects, including User Agreements and/or Agency Contracts, Partnership Contracts, and Purchase Contracts for legal persons;
- data subjects' consent to the processing of their personal data.
- realization of the rights and legal interests of the Operator or third parties or achievement of socially significant goals, provided that no rights or freedoms of the data subject are violated in the course thereof.

3.3. For the purposes of fulfilling the agreement with the data subject, in cases where the data subject is a direct or indirect beneficiary or a guarantor, processing may be performed without the data subject's consent on the personal data received from the data subject or provided by the Customer (Seller) voluntarily with notice to the data subject, including under a User Agreement and/or an Agency Agreement.

#### 4. Tools for analyzing user activity on the Website.

4.1. The Operator may use Cookies on the website. Cookies allow the web server to transfer data to a computer for storage and other purposes. We use Cookies and other technologies in order to, among other things, ensure a higher level of service, provide more complete information, and ensure that Users have the possibility to use the Website on a continuous basis. If you do not need the information obtained via Cookies, you may reject using them — this standard function is available in almost all browsers.

4.2. The Operator uses the following types of web analytics tools:

Technical and functional cookie files	These files are generated by the Website's engines and used for ensuring continuous operation of the Website, as well as for remembering the user's settings (such as language and pop-up banner controls).
Marketing and analytics cookie files and pixels	Collection and statistical analysis of the data related to the use of the Website is performed using the Yandex.Metrica and AdRiver services. The data collected by the web analytics systems being used may be received and processed by third-party providers of such systems (such as Yandex LLC and ADRIVER LLC), including providers located abroad. Moreover, various additional service pixels may be used as well.

#### 5. Procedure and conditions for processing of personal data.

5.1. The Operator processes personal data in accordance with the requirements of the law of the Russian Federation.

5.2. The Operator processes personal data in an automated, non-automated, and hybrid manner.

5.3. Depending on the purpose of processing, the Operator may perform actions on your personal data, including recording, collection, organization, accumulation, storage, rectification (update, alteration), retrieval, use, transfer (dissemination, provision, access), including across borders, reception, blocking, erasure, or destruction.

The Operator does not make decisions based solely on automated processing of personal data which produce legal effects in relation to the data subject or otherwise affect their rights and legitimate interests.

5.4. The Operator does not publish personal data on the website, in the Magnit Plus application, or in other publicly available sources without the consent of the data subject, unless required to do so by law. No conditions or restrictions are set

when data subjects provide their consent to the processing of personal data allowed for dissemination. The Operator is not responsible for any potential pecuniary or non-pecuniary damage which may be inflicted upon the User by third parties as a result of any effect exerted on the User with the help of the User's personal data published by the User on the website and its services or in the Magnit Plus mobile application.

5.5. The Operator may record phone calls with the Customer and other persons communicating with the call center. Pursuant to Paragraph 4 of Article 16 of the Federal Law "On Information, Information Technology, and Protection of Information," the Operator undertakes to prevent any attempts to gain unauthorized access to information and/or transfer information to persons not directly related to order fulfillment it becomes aware of, as well as to discover and eliminate such violations in a timely manner.

5.6. The Operator does not process biometric personal data or special categories of personal data concerning racial or ethnic origin, political opinions, religious or philosophical beliefs, health, or sex life for the purpose of providing the Website, except for cases set forth by the law of the Russian Federation.

5.7. When collecting personal data, including via the Internet data and telecommunications network, the Operator ensures that personal data of citizens of the Russian Federation are recorded, organized, accumulated, stored, rectified (updated, altered), and retrieved using databases located in the Russian Federation, except for cases set forth by the Personal Data Law.

5.8. Personal data are processed by those of the Operator's employees whose official duties include processing of personal data.

5.9. Personal data are processed via:

- receipt of personal data in oral or written form directly from data subjects;
- receipt of personal data from public sources;
- entry of personal data into the Operator's logs, registries, and information systems;
- receipt of personal data in electronic form via the Website;
- other means of processing of personal data.

5.10. The Operator processes personal data based on the following principles:

- lawfulness and fairness of the purposes and manner of processing of personal data;
- good faith;
- conformance of the purposes of processing of personal data to the previously defined and stated purposes of collection of personal data, as well as the Operator's authority;

- conformance of the scope and nature of the processed personal data and the manner in which they are processed to the purposes of processing of personal data;

- prohibition of merging of databases containing personal data created for incompatible purposes;
- limitation of the scope of processed personal data to the stated processing purposes;

- personal data are processed in a manner which ensures their accuracy, completeness, and, if necessary, relevance to the purposes of processing of personal data, and necessary measures are taken to delete or rectify incomplete or inaccurate personal data;

- personal data are stored in a form which permits identification of data subjects for no longer than is necessary for the purposes of processing of personal data, unless a time period for the storage of personal data is set forth by federal law, a consent to processing, or a contract to which the data subject is a party, beneficiary, or guarantor.

- processed personal data are destroyed after the purposes of processing are achieved or if there is no further need to achieve such purposes, unless otherwise provided by federal law.

- the processing of personal data is not used for the purpose of inflicting pecuniary and/or non-pecuniary damage upon data subjects or hampering exercise of their rights and freedoms.

## 6. Transfer of personal data.

6.1. Personal data are processed by the Operator as well as third parties which are engaged by the Operator for processing or to which personal data are transferred in accordance with the law of the Russian Federation. Such third parties may include:

- the Group's affiliated businesses, including subsidiaries, for the purpose of facilitating intercompany interactions and corporate governance;

- organizations effecting settlements between the Customer and the Website;

- pickup point partners and delivery services and agents delivering and handing over goods;

- the Operator's partners providing support services for information systems being used, web hosting services, services related to arrangement of access control, as well as legal, audit, and other services, purchased by the Operator for the aforementioned purposes;

- state and/or municipal authorities in cases set forth by law.

6.2. The Operator may engage third parties to process the received personal data and/or transfer the received personal data to them as well as receive personal data from them for the stated purposes without the need to obtain additional consent from the data subject, provided that such third parties ensure that the personal data is kept confidential and secure during the processing. The aforementioned third parties are allowed to process personal data by both automated and non-automated means and to perform any actions for the processing of personal data which are not contrary to the law of the Russian Federation. A third party may process personal data only under a contract which sets forth the list of actions (operations) to be

performed on the personal data and the purposes of processing, as well as provisions to ensure the security of the personal data, including the requirements to neither disclose nor disseminate the personal data without the data subject's consent, unless otherwise provided by the law of the Russian Federation, and the requirements in line with Article 19 of the Personal Data Law.

6.3. The Operator may contract the processing of personal data out to third-party processors. The processors undertake to comply with the principles and rules of the processing of personal data set forth by the Personal Data Law (including Article 18.1 and Paragraph 5 of Article 18 thereof) as well as in other laws and by-laws. If the Operator contracts the processing of PD out to:

- a Russian legal or natural person — the liability to the data subject for the actions of such person is borne by the Operator, and the Russian legal or natural person which performs the processing of personal data at the instruction of the Operator is liable to the Operator;

- a foreign natural or legal person — the liability to the data subject for the actions of such persons is borne by the operator and the person which performs the processing of personal data at the instruction of the Operator.

The Processor does not have to obtain the data subject's consent to the processing of their personal data. If the processing of personal data at the instruction of the Operator requires obtaining the data subject's consent, such consent is obtained by the Operator directly.

6.4. The Operator may perform cross-border transfer of personal data, including transfer to countries which do not ensure an adequate level of protection of data subjects' rights, in pursuance of a contract or based on the data subject's consent as well as other legal grounds.

The Operator performs cross-border transfer of personal data only if such transfer is not prohibited based on the results of the review of the respective notice by Roskomnadzor and with due account of the restrictions set forth by Roskomnadzor, if any. If Roskomnadzor decides to prohibit the cross-border transfer, the Operator does not perform such transfer of data subjects' personal data and ensures that the receiving party destroys the data subject's personal data which have already been transferred.

6.5. Transfer of personal data to the inquiry and investigation authorities, Federal Tax Service, Pension Fund of the Russian Federation, Social Insurance Fund, and other competent executive authorities and organizations is also performed in strict compliance with the requirements of the law of the Russian Federation.

## 7. Rights of the data subject.

7.1. When their personal data is processed, data subjects have the right to:

- request information pertaining to the processing of their personal data,
- demand the rectification, destruction, or blocking of their personal data if the latter are incomplete, outdated, inaccurate, obtained illegally, or no longer needed for the stated purpose of processing,
- revoke the consent to the processing of personal data given to the Operator,
- appeal the actions of the Operator via administrative or judicial proceedings.

7.2. The data subject has the right to receive information pertaining to the processing of their personal data, including:

7.2.1. Confirmation of the processing of the personal data by the Operator.

7.2.2. Legal grounds and purposes of the processing of the personal data.

7.2.3. Purposes of and means utilized by the Operator for the processing of the personal data.

7.2.4. Name and location of the Operator and information about the persons (excluding the Operator's employees) who have access to the personal data or to whom the personal data can be disclosed under a contract with the Operator or federal law.

7.2.5. Personal data being processed which is related to the respective data subject and the source of such personal data, unless a different procedure for provision of such data is set forth by federal law.

7.2.6. Time periods for the processing of the personal data, including the time periods for their storage.

7.2.7. Procedure for the data subject to exercise the rights set forth by the Personal Data Law.

7.2.8. Information on the performed or expected cross-border transfers of the personal data.

7.2.9. Full name and address of the person performing the processing of the personal data at the instruction of the Operator, if the processing is or will be entrusted to such person.

7.2.10. Information about the means used by the Operator to fulfill the obligations established by Article 18.1 of the Personal Data Law.

7.2.11. Other information set forth by the Personal Data Law or other federal laws.

7.3. The information provided will not contain personal data related to other data subjects, except for cases with legitimate grounds for disclosure of such personal data.

7.4. In accordance with Paragraph 3 of Article 14 of the Personal Data Law, the information pertaining to the processing of the personal data of the data subject may be provided to the data subject or their legal representative by the Operator upon request from the data subject or their legal representative.

7.5. The request must include:

- the number of the primary identification document of the data subject or their representative and information on the date of issue of the aforementioned document and the issuing authority;

- the information confirming the relationship between the data subject and the Operator (contract number, date of contract, verbal designation, and (or) other information) or information otherwise confirming the processing of the personal data by the Operator.

- the signature of the data subject or their representative.

7.5.1. The request can be submitted in the form of an electronic document and signed with an electronic signature in accordance with the law of the Russian Federation.

7.6. The data subject has the right to demand from the Operator the rectification, destruction, or blocking of their personal data if such personal data are incomplete, outdated, inaccurate, obtained illegally, or no longer needed for the stated processing purpose, as well as take such actions to protect their rights as are set forth by law.

- If it is confirmed that the personal data are inaccurate, the Operator updates the personal data based on the information provided by the data subject, their representative, or Roskomnadzor, or other required documents, within seven business days from the date when such information is received, and unblocks the personal data.

7.7. In order to exercise the rights set forth herein, the data subject must send the corresponding request to the Operator in one of the following ways:

- in hard copy bearing the data subject's handwritten signature — to the Operator's correspondence address: 15/5 Solnechnaya Street, Krasnodar 350072 Russia;

- in the form of an electronic document signed with an electronic signature — to the Operator's email address: info@magnit.ru.

7.8. If the data subject's request does not contain all the necessary information in accordance with the requirements of the Personal Data Law, or if the subject does not have the rights to access the requested information, the Operator replies with a substantiated refusal.

- The right of the data subject to access their personal data may be restricted in accordance with Paragraph 8 of Article 14 of the Personal Data Law, including in cases where the access of the data subject to their personal data violates the rights and legitimate interests of third parties.

7.9. In the event of discovery of unlawful processing of personal data upon request of the data subject, their representative, or Roskomnadzor, the Operator blocks the unlawfully processed personal data related to this data subject immediately upon such request.

7.10. Upon achievement of the purposes of processing of personal data or revocation of the consent to the processing of personal data by the data subject, the personal data must be destroyed, unless:

- otherwise provided by a contract to which the data subject is a party, beneficiary, or guarantor;

- the Operator has the right to process the personal data without the consent of the data subject on the grounds provided by the Personal Data Law or other federal laws;

- otherwise provided by another agreement between the Operator and the data subject.

7.11. If the data subject revokes their consent to the processing of their personal data, the Operator undertakes to terminate the processing of such personal data or ensure the termination of such processing and, if the storage of the personal data is no longer required for the purposes of processing of personal data, destroy such personal data or ensure their destruction within no more than thirty days from the date of such revocation, unless otherwise provided by a contract to which the User is a party, beneficiary, or guarantor.

7.12. If the data subject requests the Operator to terminate the processing of personal data, the Operator must terminate the processing of such personal data within no more than 10 (ten) business days from the date it receives the respective request or ensure the termination of such processing (if such processing is performed by a person performing the processing of personal data), except for cases set forth in Clauses 2–11 of Paragraph 1 of Article 6, Paragraph 2 of Article 10, and Paragraph 2 of Article 11 of the Personal Data Law. The aforementioned period may be extended for no more than 5 (five) business days if the Operator sends to the personal data subject a substantiated notice indicating the reasons for extending the time period for providing the requested information. In this case, the consent of such data subject to the processing of their personal data allowed for dissemination terminates immediately upon the receipt of such request (Paragraphs 12, 13 of Article 10.1 of the Personal Data Law).

At the same time, the request by the User of the Website to terminate the processing of their personal data entails the deletion of their account, which makes it impossible to use the Website.

## **8. Information regarding implemented requirements for protection of personal data.**

8.1. An important condition for the fulfillment of the Operator's purposes is that it must ensure an adequate and sufficient level of security of personal data information systems, maintenance of the confidentiality, integrity, and availability of the personal data being processed, and preservation of the data storage media containing personal data at all stages of the processing thereof.

8.2. When processing personal data, the Operator takes all necessary legal, organizational, and technical measures to protect the personal data against unlawful or accidental access, destruction, alteration, blocking, copying, provision, or dissemination, as well as any other unlawful actions with regard to the personal data. The Operator reviews and updates such measures on a regular basis to guarantee the highest level of security for the personal data being processed. These measures are detailed in the Policy, as well as in the Operator's internal documentation and local regulations.

8.3. Such measures include:

- maintaining records of the categories and specific types of personal data processed by the Operator, categories of the data subjects whose personal data are processed, time periods for the storage of such personal data, and procedures for the destruction of such personal data;
- ensuring segregated storage of personal data (physical media) processed for different purposes;
- maintaining conditions that ensure the integrity of personal data and preclude unauthorized access to such personal data during the storage of physical media;
- conducting threat modeling and identifying potential threats to the security of personal data during their processing in personal data information systems;
- taking organizational and technical measures to ensure the security of personal data during processing in personal data information systems necessary to comply with the requirements to the protection of personal data that ensure the levels of data security set forth by the Government of the Russian Federation.
- defining and taking technical and organizational measures to ensure the protection of personal data prior to the introduction of new processes for the processing of personal data and new personal data information systems;
- executing and documenting assessments regarding the potential damage that may be inflicted upon data subjects in the event of violation of the Federal Law “On Personal Data,” correlating the aforementioned damage to the measures taken by the Company;
- adopting local regulations and other documents that govern the relations pertaining to the processing and protection of personal data;
- designating persons to be responsible for ensuring the security of personal data within the Operator’s structural subdivisions and information systems;
- deploying information security measures that have undergone the prescribed compliance assessment procedures;
- evaluating the effectiveness of the measures taken to ensure the security of personal data prior to the deployment of a personal data information system;
- detecting instances of unauthorized access to personal data and taking measures in response thereto;
- restoring personal data altered or destroyed as a result of unauthorized access;
- establishing rules governing access to personal data processed within the personal data information system and ensuring the registration and logging of all actions performed with the personal data in the personal data information system;
- overseeing the implementation of measures intended to ensure the security of personal data and monitoring the security of personal data information systems;
- maintaining records of electronic media and documents containing personal data;
- arranging and implementing access control and internal security regimes within the Operator’s premises;
- positioning technical means for the processing of personal data within the secured premises;
- deploying necessary information protection measures;
- establishing rules governing access to personal data processed within personal data information systems and ensuring the registration and logging of all actions performed with the personal data in the personal data information system, where necessary;
- maintaining security equipment and alarm systems in a state of constant operational readiness;
- monitoring user actions and investigating violations of the requirements with regard to the security of personal data;
- maintaining records of the positions held by the Operator’s employees whose access to personal data processed by both automated and non-automated means is necessary for the fulfillment of their official (labor) duties;
- ensuring that the Operator’s employees directly engaged in the processing of personal data are duly acquainted with and sign off on the provisions of the law of the Russian Federation pertaining to personal data, including the requirements for the protection of personal data, the Policy, and the Operator’s other internal regulations governing the processing and protection of personal data, as well as providing training to such employees;
- terminating the processing of personal data and destroying personal data in cases set forth by the law of the Russian Federation;
- exercising regular internal oversight and/or conducting regular internal audits to verify that the processing and protection of personal data comply with the current law of the Russian Federation governing the processing and protection of personal data;
- publishing or otherwise ensuring unrestricted access to the Policy;
- notifying Roskomnadzor, the National Coordination Center for Computer Incidents, and the Federal Security Service of any computer incidents that have taken place at PJSC “Magnit” and have resulted in the unlawful transfer (provision, dissemination, or access) of personal data;
- taking any other action set forth by the law of the Russian Federation pertaining to personal data.

8.4. The Operator has appointed a person responsible for arranging the processing of personal data.

8.5. The Operator’s internal documents mandatory for compliance by all employees of the Operator, as well as agreements with partners and other third parties, define, insofar as they are relevant:

- procedures for granting access to information;
- procedures for altering personal data to ensure their accuracy, validity, and relevance, including in relation to the purposes of processing;
- procedures for the destruction or blocking of personal data when required;

- procedures for addressing requests from data subjects (their legal representatives) in cases set forth by the Personal Data Law, in particular, the procedure for preparing information regarding the existence of personal data pertaining to a specific data subject, information required to enable the subject (their legal representatives) to review their personal data, as well as procedures for addressing requests for rectification, blocking, or destruction of personal data if such personal data are incomplete, outdated, inaccurate, obtained illegally, or no longer needed for the stated processing purpose;
- procedures for addressing requests from the competent agency tasked with protecting the rights of data subjects;
- procedures for obtaining the data subject's consent to the processing of personal data;
- procedures for transferring personal data to third parties;
- procedures for handling physical storage media containing personal data;
- procedures necessary for notifying the competent agency tasked with protecting the rights of data subjects within the time frames set forth by the Personal Data Law.

## **9. Policy amendment.**

9.1. The Operator may amend the terms of the Policy unilaterally and at any time in order to align it with the current law. The Operator recommends regularly checking the content of the Policy for any possible amendments.

9.2. The new version of the Policy comes into effect immediately upon its publication on the Operator's Website, unless otherwise defined in the new version of the Policy.

9.3. Any current version of the Policy remains in effect indefinitely until replaced with a new version.

## **10. Access to policy.**

10.1. The Policy is freely accessible via the Internet on the Operator's Website at <https://magnit.com/ru/> and is a public document.

10.2. The Policy is available via the following link: <https://magnit.com/ru/>.

## **11. Feedback.**

11.1. In case of any questions or requests regarding the processing of personal data, including those related to the revocation of the consent to the processing of personal data, the data subject may communicate with the Operator by:

- calling customer support by dialing 8 800 200-90-02 (toll-free);
- sending an email to [info@magnit.ru](mailto:info@magnit.ru);
- sending a written notice to 15/5 Solnechnaya Street, Krasnodar 350072 Russia;
- other means set forth by law or the Policy.

11.2. If the data subject has any subscriptions to advertising communications, in addition to the aforementioned channels, they may request to unsubscribe from such communications by activating the "Unsubscribe" automated function via the link included in the email containing the communication. After the activation of this function, no communication will be sent to the email address from which the function was activated.

## Purposes of processing of personal data

№	Purpose of processing	Personal data categories	Categories of data subjects	Means of processing	Time period for processing	Procedure for destruction
	Recruitment of staff, including recruitment and approval of staff for vacant positions, testing, verification of information communicated by applicants, as well as additional applicant checks necessary to ensure security and conformance to the Operator's corporate policies.	Last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; marital status; gender; email address; address of place of residence; address of place of registration; phone number; insurance number (SNILS); tax ID number (INN); citizenship; information from the ID document; job title; military obligations status, information about registration for military service; information about education; <b>as well as:</b> previously used last name; information about family members; city; information	Applicants; other categories of data subjects whose personal data are processed; endorsers; applicants' relatives.	Hybrid; with transfer via the legal entity's internal network; with transfer via the Internet.	2 years after the applicant submits a CV to fill the vacant position.	- Deletion of the PD from the PDIS - Destruction of the PD on paper media by means of a physical media shredder.

		about employment experience; information about preferences; information about knowledge of foreign languages; place of employment; existence of ongoing debt enforcement proceedings; information about relatives employed by Magnit Group; information about relatives employed by a different retail company (retail chain), including e-commerce companies; information about being a founder of an enterprise or being registered as an individual entrepreneur; information about relatives who are founders of an enterprise or are registered as individual entrepreneurs; information about whether the applicant holds an office in a state or municipal			
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		institution.				
2.	Formalization of employment, including preparation, signature, and execution of an employment contract, referral of applicants to specific positions to medical examination.	Last name, first name, patronymic; year of birth; month of birth; date of birth; place of birth; marital status; gender; email address; address of place of residence; address of place of registration; phone number; insurance number (SNILS); tax ID number (INN); citizenship; information from the ID document; job title; military obligations status, information about registration for military service; information about education; <b>as well as:</b> previously used last name; information about employment experience; employment start date; information about income at the previous place of employment;	Applicants; other categories of data subjects whose personal data are processed; applicants' relatives.	Hybrid; with transfer via the legal entity's internal network; with transfer via the Internet.	2 years after the applicant submits a CV to fill the vacant position.	<ul style="list-style-type: none"> <li>- Deletion of the PD from the PDIS</li> <li>- Destruction of the PD on paper media by means of a physical media shredder.</li> </ul>

		information about periods of temporary incapacity for work, release from work at the previous place of employment; information about family members; place of employment; work schedule; information about e-signature certificate; employee ID number; information about work permit, permanent residence permit, temporary residence permit or work patent, voluntary medical insurance policy, refugee certificate, fingerprint card, etc.; information about vaccination against measles and other certificates issued by a medical institution; information about tax status; information from the			
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		marriage certificate; information about conditions of employment and termination at previous places of employment; bank account details.				
3.	Provision of a possibility for communication among employees, including sending of internal information messages, arrangement of communication via corporate resources, arrangement of surveys, competitions, corporate events, and charitable activities.	Last name, first name, patronymic; phone number; information from the ID document; job title; <b>as well as:</b> address of place of employment; corporate email address; subdivision name.	Partners' representatives.	Automated; with transfer via the legal entity's internal network; with transfer via the Internet.	If a contract was signed with the partner — the entire duration of the contract plus 5 years after its termination; if no contract was signed — 1 year.	- Deletion of the PD from the PDIS.
4.	Arrangement of training for the Operator's employees, including onboarding and adaptation during formalization of employment as well as arrangement of internal employee training	Last name, first name, patronymic; email address; phone number; information from the ID document; <b>as well as:</b> subdivision name; information about the superior.	Partners' representatives.	Hybrid; with transfer via the legal entity's internal network; with transfer via the Internet.	If a contract was signed with the partner — the entire duration of the contract plus 5 years after its termination; if no contract was signed — 1 year.	- Deletion of the PD from the PDIS - Destruction of the PD on paper media by means of a physical media shredder.
5.	Maintenance of safe working conditions,	Last name, first name, patronymic;	Partners' representatives.	Hybrid; with transfer via the legal entity's	If a contract was signed with the	- Deletion of the PD from the

	including special assessment of working conditions (SAWC), assessment of professional skills, provision of information about health and safety requirements to employees, arrangement of training on occupational safety, investigation of accidents.	email address; phone number; job title; <b>as well as:</b> subdivision name; place of employment; corporate email address; address of place of employment.		internal network; with transfer via the Internet.	partner — the entire duration of the contract plus 5 years after its termination; if no contract was signed — 1 year.	PDIS - Destruction of the PD on paper media by means of a physical media shredder.
6.	Access control and security on the Operator's premises, including maintenance of access control and physical security on the Operator's premises, visitor control, preservation of tangible and other assets, video surveillance.	Last name, first name, patronymic; year of birth; month of birth; date of birth; gender; phone number; information from the ID document; job title; <b>as well as:</b> subdivision name; email address; access card number; photo; video image; information about vehicle (license plate number); information about work schedule; place of employment.	Partners' representatives; other categories of data subjects whose personal data are processed; other visitors.	Hybrid; with transfer via the legal entity's internal network; with transfer via the Internet.	1 year after the visit.	- Deletion of the PD from the PDIS - Destruction of the PD on paper media by means of a physical media shredder.
7.	Investigation of internal violations, including	Last name, first name, patronymic; phone number;	Partners' representatives; other categories of	Hybrid; with transfer via the legal entity's internal	5 years after the violation.	- Deletion of the PD from the PDIS

	reception and processing of statements about violations of business ethics, corruption-related activities, fraud, conflict of interest, embezzlement, abuse of power, investigation of the aforementioned violations and implementation of corresponding actions.	job title; <b>as well as:</b> corporate email address; region; city; IP address; account; login and password; information provided in the statement.	data subjects whose personal data are processed; other persons mentioned in the statement.	network; with transfer via the Internet.		- Destruction of the PD on paper media by means of a physical media shredder.
8.	Interaction with partners in the course of business, including signing, execution, and cancellation of contracts, performance of due diligence procedures with regard to the Operator's potential partners, as well as validation of conformance of potential partners to the Operator's internal policies, maintenance of communications related to signing, execution, and cancellation of contracts; execution of	Last name, first name, patronymic; year of birth; month of birth; date of birth; gender; email address; address of place of residence; address of place of registration; phone number; insurance number (SNILS); tax ID number (INN); information from the ID document; job title; <b>as well as:</b> place of employment; subdivision name; email address; information	Partners; partners' representatives; other categories of data subjects whose personal data are processed; potential partners; representatives of potential partners.	Hybrid; with transfer via the legal entity's internal network; with transfer via the Internet.	If a contract was signed with the partner — the entire duration of the contract plus 5 years after its termination; if no contract was signed — 1 year.	- Deletion of the PD from the PDIS - Destruction of the PD on paper media by means of a physical media shredder.

	contractual settlements, enforcement of rights and legitimate interests, adherence to accounting and tax laws, procurement activities.	about issued powers of attorney; bank account details.			
9.	Provision of the Operator's website, signing, execution, and cancellation of contracts for its use.	Last name, first name, patronymic; email address; phone number; <b>as well as:</b> information about use of the website or devices via which it is used; information from cookie files; region and city; contents of the message and sent files.	Other categories of data subjects whose personal data are processed; users.	Automated; with transfer via the legal entity's internal network; with transfer via the Internet.	1 year after reception unless otherwise provided for by the law of the Russian Federation.  - Deletion of the PD from the PDIS.