

*Updated as of 24 April 2025*

## **PERSONAL DATA PROCESSING POLICY**

### **1. General Concepts**

1.1. The Personal Data Processing Policy (hereinafter referred to as the Policy) has been developed in accordance with Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" and other regulatory acts of the Russian Federation.

1.2. This Policy determines the procedure for processing personal data of users of the <https://goarctic.energy> website (hereinafter referred to as the Website), the conditions and principles of processing personal data, the rights and obligations of Users and the Operator, information on the measures implemented for protecting processed personal data in connection with holding the International Educational Competition "Icebreaker of Knowledge" (hereinafter referred to as the Competition) by ANO Energy of the Future (hereinafter referred to as the Operator) in collaboration with third parties.

1.3. This Policy applies to all personal data received by the Operator from users of the Website (hereinafter referred to collectively as the Users or individually as the User).

1.4. In case of disagreement with the terms of the Policy, the User must immediately cease any use of the Website.

1.5. This Policy applies solely to the Website. The Operator is not responsible for third-party websites to which the User may go via the links on the Website.

### **2. Terms and Definitions**

2.1. The Policy uses the following terms and definitions:

"Website" means the website located at <https://goarctic.energy>;

"Personal Data" ("PD") means any information relating directly or indirectly to a specific or identifiable individual (data subject);

"Blocking of PD" means temporary suspension of PD processing (except in cases where processing is necessary for PD clarification);

"Depersonalisation of PD" means actions resulting in it being impossible to determine the association of the PD with a specific PD subject without the use of additional information;

"Processing of PD" means any action (operation) or set of actions (operations) performed with or without the use of automation tools on personal data, including collection, recording, systematisation, accumulation, storage, clarification (updating, modification), retrieval, usage, transfer (dissemination, provision, access), depersonalisation, blocking, deletion, destruction of PD;

"Operator" means ANO Energy of the Future, address (location): 3 Varshavskoe Highway, Moscow 117105, INN (Taxpayer Identification Number) 7726385219, OGRN (Primary State Registration Number) 1167700063300;

"Provision of PD" means actions aimed at disclosing PD to a specific person or a specific group of persons;

"Dissemination of PD" means actions aimed at disclosing PD to an unspecified group of persons (transfer of PD) or making personal data available to an unlimited group of persons, including publication of PD in mass media, posting in information and telecommunication networks, or providing access to personal data in any other way;

"User" means a visitor of the Website, subject of Personal Data. In the case where the User is a minor, this term applies both to the minor and their legal guardian (parent). If the User is a legally incapacitated person, this term applies both to the incapacitated individual and their legal guardian.

"ISPD" means Information System of Personal Data.

"Destruction of PD" means actions that result in the inability to restore the content of Personal Data in the ISPD, and/or result in the destruction of material carriers of Personal Data.

"Cookies" means data automatically transmitted to the Operator during the use of the Website via the software installed on the User's device, including the IP address, geographical location, browser information, and

type of User's device operating system, technical specifications of the User's equipment and software, and the date and time of accessing the Website. By accepting the terms of the Policy, the User agrees to the use of cookies.

### **3. Legal Grounds and Purposes of Personal Data Processing**

3.1. The legal grounds for processing Personal Data are:

- Civil Code of the Russian Federation;
- Federal Law No. 152-FZ of 27.07.2006 "On Personal Data";
- Federal Law of the Russian Federation No. 149-FZ of 27.07.2006 "On Information, Information Technologies, and Information Protection";
- Other regulatory legal acts of the Russian Federation;
- Bylaws of the Operator.

3.2. The Operator processes the User's personal data exclusively for the following purposes:

3.2.1. Registration and identification of the User on the Website, providing the User with the possibility of full use of the Website within the framework of organising and conducting the Competition;

3.2.2. Displaying the User's profile for other Users of the Website;

3.2.3. Establishing and maintaining communication between the User and the Operator, advising on issues related to organising and conducting the Competition, holding events aimed at promoting the Competition;

3.2.4. The Operator sending to the User messages of an advertising nature, information bulletins about the Operator's and its partners' products and services, special offers, promotional campaigns, lotteries, competitions, and surveys to the User's email address, phone number (Username) via messengers such as WhatsApp, Viber, Telegram, through postal mailings, SMS messages, push notifications, as well as providing such information to the User verbally over the phone;

3.2.5. Posting on the Website, in official social network groups, and other communities of the Operator on the Internet, in other advertising and/or informational sources, for purposes not related to identifying the User:

- photos and/or videos obtained during the organisation and conduct of the Competition,
- feedback about the Competition provided by the User.

3.2.6. Improving the quality of User service and enhancing the Website;

3.2.7. Statistical and other studies based on anonymised information provided by the User;

3.2.8. Providing the User with access to third-party websites or services of the Website's partners in order to receive their offers, updates, or services;

3.2.9. Posting information on the Website about events organised by the Operator as part of the organisation, conduct, and promotion of the Competition, as well as in any materials placed on external and internal advertising displays, in printed and/or electronic publications (booklets, promotional and informational materials), on the Internet, as well as in video files of any format, both within the Russian Federation and abroad.

3.3. The specific scope of personal data processed in accordance with the aforementioned purposes is defined in Section 5 of the Policy.

### **4. Terms and Procedure for Granting Consent for Personal Data Processing**

4.1. The Operator does not verify the Personal Data provided by the User. Consequently, the Operator assumes that the User, when providing Personal Data on the Website:

4.1.1. Is a legally capable individual. In the event of a legally incapacitated individual using the Website, consent for the processing of Personal Data is provided by the User's legal guardian, who has reviewed and accepted the terms of data processing outlined in this Policy, including granting consent for the processing and/or dissemination of Personal Data in the manner and under the conditions stipulated in this Policy.

4.1.2. Is of legal age. Participation in the Competition by minors aged 14 to 18 years is carried out through their legal guardians in accordance with the legislation of the Russian Federation and the Competition Rules. For a minor Participant, consent for the processing of Personal Data is provided by their legal guardian (parent), who has reviewed and accepted the conditions for processing Personal Data outlined in this Policy, including providing consent for the processing and/or dissemination of Personal Data as stipulated by this Policy.



4.1.3. Provides accurate information about themselves or the represented legally incapacitated (minor) individual (clauses 4.1.1. and 4.1.2.) to the extent necessary for the use of the Website. The User independently maintains the provided Personal Data in a current and accurate state.

4.1.4. Acknowledges that the information posted on the Website by the User about themselves may become accessible to other Users and may be copied and disseminated by such Users in cases stipulated by the Policy and/or as a result of the actions of malicious software (viruses).

4.2. The User accepts the terms of the Policy and provides the Operator with informed and intentional consent for the processing and/or dissemination of their Personal Data under the conditions stipulated by the Policy and the legislation of the Russian Federation:

4.2.1. During registration and identification on the Website, for personal data provided by the User to the Operator: by completing the registration form available online at <https://goarctic.energy>. The User is considered to have given consent for the processing and/or dissemination of their personal data at the moment they click the "Register" button or another button equivalent in meaning (placing a similar mark in the registration field). Separate additional consent for the processing and/or dissemination and/or use of the User's photo or video image is not provided for.

4.2.2. When entering or modifying personal data in the "Personal Information" section of the Personal Account: during the editing or supplementing of information in the "Personal Information" section. At the User's discretion in the Personal Account, the following information may be specified: date of birth; gender; image (photograph uploaded through the Website or a link specified from a social network/other electronic service); links to social network profiles. The specified personal data may be used to fulfil the Operator's obligations stipulated by the terms and conditions of the Competition. The User is considered to have given consent for the processing of their newly entered or modified personal data upon completing their editing. After filling in any of the fields specified in the "Personal Information" section, the personal data is updated automatically.

4.2.3. When filling out the feedback form, including an application to use other services on the Website: for Personal Data provided by the User to the Operator when completing the feedback form on the Internet on the Website and electronic services. The User is considered to have given consent for the processing and/or dissemination of their PD, entered into the fields of the feedback form, at the moment of pressing the button confirming the submission of the application (buttons may be labelled "Submit", "Leave an application", "Sign Up", "Request Consultation", or similar).

4.2.4. When subscribing to receive informational and news materials from the Operator: by completing the subscription form located on the Internet at <https://goarctic.energy>, the User is considered to have given consent for the processing and/or dissemination of their PD by ticking the box "I agree with the terms of PD processing".

4.2.5. During any use of the Website: for PD automatically transferred to the Operator during the use of the Website through the software installed on the User's device, the User is considered to have given consent for the processing and/or dissemination of their PD at the moment of starting to use the Website.

4.3. By performing the actions specified in clause 4.2 of this Policy, the User consents to the Operator processing and/or distributing the relevant PD, the list of which is outlined in section 5 hereof, including collection, recording, systematisation, accumulation, storage, clarification (updating, modification), extraction, use, transfer (dissemination, provision to third parties, access), anonymisation, blocking, deletion, destruction of PD using and without the use of automation tools, in accordance with the purposes stated in section 3 hereof.

4.4. The consent provided by the User in accordance with this Policy for the processing of PD is effective from the day such consent is provided and for the period necessary to achieve the purposes of PD processing or until the User withdraws the given consent, unless otherwise stipulated by the legislation of the Russian Federation. The consent provided by the User in accordance with this Policy for the processing of personal data can be revoked by the User at any moment. The User may revoke the previously provided consent to the Operator for the processing of personal data in one of the following ways:

- By sending a corresponding statement by post to the address: 3 Varshavskoe Highway, Moscow 117105
- By sending a relevant statement in the form of an electronic document to the email address: [info@goarctic.energy](mailto:info@goarctic.energy).

## 5. Personal data processed by the Operator

5.1. Processing of Users' personal data is carried out under the following conditions:

PURPOSE OF USING PERSONAL DATA	VOLUME OF PROCESSED PERSONAL DATA
Registration and identification of the User on the Website, enabling the User to fully utilise the Website in the context of organising and conducting the Competition (Clause 3.2.1)	<ul style="list-style-type: none"> <li>• full name;</li> <li>• email address;</li> <li>• telephone number;</li> <li>• date of birth;</li> <li>• citizenship;</li> <li>• country of residence;</li> <li>• city</li> </ul>
Displaying a profile for other Users of the Website (clause 3.2.2)	<ul style="list-style-type: none"> <li>• full name;</li> <li>• Image (if specified in the "Personal Account" section)</li> </ul>
Establishing and maintaining communication between the User and the Operator, consulting on matters related to the organisation and conduct of the Competition, conducting activities aimed at promoting the Competition (clause 3.2.3)	<ul style="list-style-type: none"> <li>• full name;</li> <li>• citizenship;</li> <li>• country of residence;</li> <li>• city</li> <li>• telephone number;</li> <li>• e-mail address.</li> </ul>
Sending promotional messages; informational newsletters; providing advertising information in both oral and written forms (clause 3.2.4).	<ul style="list-style-type: none"> <li>• full name;</li> <li>• telephone number;</li> <li>• e-mail address.</li> </ul>
Placement (including providing experts with photo and video materials obtained during the organisation and conduct of the Competition; User comments regarding the procedures and conditions for organising and conducting the Competition) (clause 3.2.5).	<ul style="list-style-type: none"> <li>• full name;</li> <li>• gender</li> <li>• country of residence;</li> <li>• citizenship;</li> <li>• image, including video (free of charge)</li> <li>• social media account data (if specified in the 'Personal Information' section)</li> </ul>
Improvement of Customer Service quality and Website modernisation (clause 3.2.6.)	<ul style="list-style-type: none"> <li>• cookies</li> </ul>
Statistical and other research based on anonymised information (clause 3.2.7)	<ul style="list-style-type: none"> <li>• cookies</li> </ul>
Providing User access to third-party websites or the Website partners' services for receiving their offers, updates, or services (clause 3.2.8.)	<ul style="list-style-type: none"> <li>• full name;</li> <li>• email address;</li> </ul>



Posting information on the Website about events organised by the Operator as part of the organisation, conduct, and promotion of the Competition, as well as in any materials placed on external and internal advertising displays, in printed and/or electronic publications (booklets, promotional and informational materials), on the Internet, as well as in video files of any format, both within the Russian Federation and abroad (cl. 3.2.9.).	<ul style="list-style-type: none"> <li>• full name;</li> <li>• gender</li> <li>• Country (city) of residence;</li> <li>• citizenship;</li> <li>• Image, including video (free of charge).</li> </ul>
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## 6. Processing of personal data

6.1 The Operator processes personal data based on the following principles:

- Legitimate interest and fairness;
- Limiting PD processing to the achievement of specific pre-defined legal purposes;
- Prohibition of processing personal data incompatible with the purposes of its collection;
- Prohibition of combining databases containing personal data processed for mutually incompatible purposes;
- Processing only personal data that aligns with the purposes of its processing;
- Ensuring the content and scope of processed personal data correspond to the declared processing purposes;
- Prohibition of processing personal data excessive in relation to the declared processing purposes;
- Ensuring the accuracy, sufficiency, and relevance of personal data relative to the processing purposes;
- Destruction or anonymisation of personal data upon achieving the processing objectives or in case of loss of necessity to achieve these objectives, upon receiving a user request for data destruction, or upon the user's withdrawal of consent for data processing.

6.2. The operator processes users' personal data (recording, systematisation, accumulation, storage, clarification (updating, modification), extraction) using databases located in the territory of the Russian Federation.

6.3. The processing of Users' personal data is carried out by the Operator both with and without the use of automated means.

6.4. The Operator and other individuals granted access to personal data are obligated not to disclose or disseminate personal data to third parties without the consent of the personal data subject, unless otherwise stipulated by the legislation of the Russian Federation.

6.5. The processing of a User's personal data involves the Operator performing the following actions: collection, recording, classification, accumulation, storage, refinement (update, modification), extraction, use, transfer (dissemination, provision to the third parties, access), depersonalisation, blocking, deletion, destruction of personal data.

6.6. The storage of Users' personal data is carried out on electronic media. In processing personal data for the purpose of fulfilling obligations under agreements with the User, the Operator may retrieve personal data and store them on physical media. The storage of such personal data is carried out for the period established by the legislation of the Russian Federation.

The storage of personal data is performed (depending on which event occurs first):

- Until the moment of their deletion by the User in the 'Personal Information' section of their account on the Website;
- Until the moment of their destruction by the Operator – in case the User withdraws their consent for data processing or demands the destruction of personal data;
- Until the expiration of the consent period (point 4.4 of the Policy).

6.7. The Operator is entitled to transfer personal data in accordance with the requirements of the legislation of the Russian Federation or the consent of the subject of personal data processing to third parties, namely:

6.7.1. Partners, such as website and application owners, advertising networks, and other partners providing services to the Operator related to the placement and display of advertisements on websites, programmes, products, or services owned or controlled by such partners;

6.7.2. Legal and/or natural persons engaged by the Operator for the organisation, conduct, and promotion of the Competition;

6.7.3. Members of the expert community within the framework of organising and conducting the Competition, including the necessity of evaluating the works of Users (video introductions, test results, etc.).

6.8. The transfer of personal data to third parties specified in clause 6.7 of the Policy is carried out under the following conditions:

- The third party processes personal data using databases located within the territory of the Russian Federation;
- The third party ensures the confidentiality of personal data during their processing and use, undertakes not to disclose or disseminate Users' personal data to other parties without their consent;
- The third party guarantees the implementation of the following measures to ensure the security of personal data during processing: use of information protection tools, detection and recording of unauthorised access to personal data incidents, and measures for personal data recovery, restriction of access to personal data, registration and logging of actions performed on personal data, monitoring and evaluation of the effectiveness of implemented measures for ensuring the security of personal data;
- List of approved methods for processing personal data: collection, recording, systematisation, accumulation, storage, updating (renewal, modification), retrieval, utilisation, transfer (dissemination, provision, access), anonymisation, blocking, deletion, destruction both with and without the use of automation tools;
- A third party is prohibited from transferring and disseminating personal data.

## **7. Measures taken by the Operator to protect personal data**

7.1. The Operator implements necessary and sufficient legal, organisational, and technical measures to protect the information provided by Users from unlawful or accidental access, destruction, modification, blocking, copying, dissemination, as well as from other unlawful actions by third parties involving it. Such actions particularly include:

- Appointing a person responsible for personal data processing;
- Applying organisational and technical measures to ensure the security of personal data during processing in information systems;
- Monitoring incidents of unauthorised access to personal data and taking measures to prevent such incidents in the future;
- Supervising the measures taken to ensure the security of personal data and the level of protection in personal data information systems.

## **8. User Rights**

8.1. The User makes the decision to provide their Personal Data and consents to its processing freely, voluntarily, and in their own interest. The User expresses their consent to the processing of Personal Data in accordance with the procedure specified in clause 4.2 of the Policy.

8.2. The User has the right to obtain information from the Operator regarding the processing of their Personal Data.

8.3. The User is entitled to send requests and demands (hereinafter referred to as the Appeal) to the Operator, including regarding the use of their Personal Data, as well as withdrawal of consent for the processing of Personal Data. The Appeal may be submitted in the following ways:

8.3.1. In written form to the Operator's address (Section 11 of the Policy);

8.3.2. In the form of an electronic document (scan, photocopy of the document). The document must be sent from the User's email address provided during registration on the Website to the email address: [info@goarctic.energy](mailto:info@goarctic.energy).



## **9. Actualisation, correction, deletion, and destruction of personal data**

9.1. The Operator undertakes to inform the User or their legal guardian, in accordance with the legislation of the Russian Federation, about the existence of personal data relating to the User, and provide an opportunity to review this personal data upon request from the User or their legal guardian within 10 (ten) days from the date of receiving the request from the User or their legal guardian. The specified period may be extended, but not by more than 5 (five) working days, after a reasoned notification is sent to the User stating the reasons for the extension.

9.2. The Operator agrees to provide the User or their legal guardian with the opportunity to review the personal data relating to the User free of charge.

9.3. Within a period not exceeding 7 (seven) working days from the date the User or their legal guardian provides evidence confirming that the personal data is incomplete, inaccurate, or outdated, the Operator undertakes to make the necessary changes.

9.4. Within a period not exceeding 7 (seven) working days from the date the User or their legal guardian provides evidence confirming that such personal data was obtained unlawfully or is not required for the declared processing purpose, the Operator undertakes to destroy such personal data. The Operator also undertakes to notify the User or their legal guardian (parent) about the changes made and the measures taken, and take reasonable steps to notify third parties to whom the User's personal data was transferred.

9.5. In case the inaccuracy of personal data is confirmed, the Operator shall, based on the information provided by the User or their legal guardian, or the authorised body for the protection of data subjects' rights, or other necessary documents, correct the personal data or ensure its correction (if the processing of personal data is carried out by another entity acting on behalf of the Operator) within 7 (seven) working days from the date of submission of such information and remove the blocking of the personal data.

9.6. The Operator undertakes to cease the processing of personal data or ensure its cessation by the entity acting on behalf of the Operator:

- In the event of identifying unlawful processing of personal data carried out by the Operator or the entity acting on behalf of the Operator, within a period not exceeding 3 (three) working days from the date of such identification;
- In the event the User withdraws consent for the processing of their personal data;
- In the event of achieving the purpose of personal data processing.

9.7. The Operator undertakes to destroy the User's personal data or ensure its destruction (if the processing of personal data is carried out by another entity acting on behalf of the Operator) within a period not exceeding 30 (thirty) calendar days from the date of achieving the purpose of personal data processing.

9.8. In the case of the impossibility of destroying personal data within the timeframe specified in Clause 9.7 of the Policy, the Operator shall block such personal data or ensure its blocking (if the processing of personal data is carried out by another entity acting on behalf of the Operator) and ensure the destruction of the personal data within a period not exceeding 6 (six) months, unless otherwise stipulated by the legislation of the Russian Federation.

## **10. Policy Changes**

10.1. The Operator reserves the right to make changes to the Policy. The user is obliged to familiarise oneself with the text of the Policy each time they use the Website.

10.2. The new edition of the Policy comes into effect from the moment it is posted in the corresponding section of the Website. Continued use of the Website or its services after the publication of the new edition of the Policy signifies the User's acceptance of the Policy and its terms. If the User disagrees with the terms of the Policy, they must immediately cease using the Website and its services.

10.3. All suggestions and/or questions regarding this Policy should be sent to the email address [info@goarctic.energy](mailto:info@goarctic.energy).

## **11. Information about the Operator**

ANO Energy of the Future, address (location): 117105, Moscow, Varshavskoye Highway, Building 3, INN 7726385219, OGRN 1167700063300