

# UTLC

Eurasian Rail Alliance

## APPROVED BY

General Director  
UTLC ERA JSC

---

<Signature> [Seal]

Signature

Alexey Grom

October 20, 2025

## Personal Data Processing Policy

### 1. General provisions

This Personal Data Processing Policy has been drawn up in accordance with the requirements of Federal Law No. 152-FZ “On Personal Data” (hereinafter referred to as the “Personal Data Law”) dated July 27, 2006, and determines the procedure for personal data processing and measures to ensure the security of personal data undertaken by United Transport and Logistics Company – Eurasian Rail Alliance Joint-Stock Company (hereinafter referred to as the “Operator”).

1.1. The Operator sets as its most important goal and underlying business condition the observance of human and civil rights and freedoms under the processing of personal data, including the protection of rights to privacy, personal and family secrecy.

1.2. This Operator’s Personal Data Processing Policy (hereinafter referred to as the “Policy”) applies to all information that the Operator may obtain about visitors on all pages and sections of the website <https://index1520.com/>.

### 2. Basic concepts used in the Policy

2.1. Automated personal data processing means personal data processing by means of computing equipment.

2.2. Blocking of personal data means the temporary cessation of personal data processing (except for cases where processing is necessary for the rectification of personal data).

2.3. Website means a set of graphic and informational materials, as well as the relevant computer software and databases ensuring their availability on the Internet at the network address <https://index1520.com/>.

2.4. Personal data information system means a set of personal data contained in databases and the information technologies and technical means ensuring their processing.

2.5. Personal data depersonalization means actions that make it impossible to determine the attribution of personal data to a particular User or any other personal data subject without the use of additional information.

2.6. Personal data processing means any action (operation) or set of actions (operations) performed with personal data with or without the use of automation tools, including collection, recording, systematization, accumulation, storage, rectification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and/or destruction of personal data.

2.7. Operator means a state authority, municipal authority, legal entity or individual, independently or jointly with other persons managing and/or performing personal data processing, as well as determining the purposes of personal data processing, the composition of personal data subject to processing, the actions (operations) to be performed with personal data.

2.8. Personal data means any information relating directly or indirectly to a particular or defined User of the website <https://index1520.com/>.

2.9. Personal data authorized by the personal data subject for dissemination means personal data, access to which is granted by the concerned personal data subject to an unlimited number of persons by giving consent to the processing of personal data authorized by the personal data subject for dissemination in the manner prescribed by the Personal Data Law (hereinafter referred to as “personal data authorized for dissemination”).

2.10. User means any visitor to the website <https://index1520.com/>.

2.11. Provision of personal data means actions aimed at the disclosure of personal data to a particular person or group of persons.

2.12. Dissemination of personal data means any actions aimed at the disclosure of personal data to an indefinite number of persons (the transfer of personal data) or the familiarization of an unlimited number of persons with personal data, including the disclosure of personal data in the mass media, its placement in information and telecommunication networks or the provision of access to personal data in any other way.

2.13. Cross-border transfer of personal data means the transfer of personal data to the territory of a foreign country to a foreign governmental authority, a foreign individual or a foreign legal entity.

2.14. Destruction of personal data means any actions resulting in the irrevocable destruction of personal data with further recovery of the content of personal data in the personal data information system rendered impossible and/or resulting in the destruction of the tangible media bearing the personal data.

### **3. Basic rights and obligations of the Operator**

3.1. The Operator shall be entitled to:

- receive reliable information and/or documents containing personal data from the concerned personal data subject;

- in case the concerned personal data subject revokes their consent to personal data processing and makes a demand to cease personal data processing, the Operator shall be entitled to continue personal data processing without the consent of said personal data subject upon the grounds specified in the Personal Data Law;

- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Personal Data Law and the regulatory legal acts adopted in accordance therewith, unless otherwise provided by the Personal Data Law or other federal laws.

3.2. The Operator shall be obliged to:

- provide the personal data subject, upon their request, with information regarding the processing of their personal data;

- manage personal data processing in accordance with the procedure established by the applicable law of the Russian Federation;

- respond to the queries and requests of personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
- give the authorized body tasked with protecting the rights of personal data subjects, at its request, the required information within 10 days from receiving the respective request;
- publish or otherwise provide unrestricted access to this Personal Data Processing Policy;
- take legal, organizational and technical measures to protect personal data from unlawful or accidental access thereto, from the destruction, modification, blocking, copying, provision and/or dissemination of personal data, as well as from other unlawful actions involving personal data;
- cease the transfer (dissemination, provision, access) of personal data, cease its processing and destroy personal data according to the procedure and in those cases stipulated by the Personal Data Law;
- fulfill the other obligations stipulated by the Personal Data Law.

#### **4. Basic rights and obligations of personal data subjects**

##### **4.1. Personal data subjects shall be entitled to:**

- receive information regarding the processing of their personal data, except for those cases envisioned by the federal laws. Information shall be provided to the personal data subject by the Operator in an accessible form and shall not contain personal data relating to other personal data subjects, except in those cases where there are legal grounds for the disclosure of such personal data. The list of the relevant information and the procedure for obtaining the same is established by the Personal Data Law;
- demand that the Operator rectify their personal data, block or destroy it in case the personal data is incomplete, outdated, inaccurate, illegally obtained or unnecessary for the stated purpose of its processing, as well as take the measures envisioned by the law to protect their rights;
- impose the condition of prior consent under the processing of personal data for the market promotion of goods, works and services;
- revoke consent to personal data processing and demand the cessation of personal data processing;
- appeal to the authorized body tasked with protecting the rights of personal data subjects or in court against the wrongful actions or omissions of the Operator in the processing of their personal data;
- exercise the other rights envisioned by the law of the Russian Federation.

##### **4.2. Personal data subjects shall be obliged to:**

- provide the Operator with reliable data about themselves;
- notify the Operator of the rectification (update, change) of their personal data.

**4.3.** Persons who have provided the Operator with inaccurate information about themselves or information about another personal data subject without the latter's consent shall bear the scope of liability envisioned in this connection by the law of the Russian Federation.

#### **5. Principles of personal data processing**

##### **5.1. Personal data shall be processed on a legitimate and just basis.**

**5.2.** Personal data processing shall be limited to achieving the specific, predetermined and legitimate purposes. The processing of personal data incompatible with the purposes of personal data collection shall be prohibited.

5.3. The merger of databases containing personal data being processed for incompatible purposes shall be prohibited.

5.4. Only personal data consistent with the purposes of its processing shall be processed.

5.5. The content and scope of the personal data subject to processing shall correspond to the stated purposes of its processing. The redundancy of personal data subject to processing in relation to the stated purposes of its processing shall be prohibited.

5.6. Under the processing of personal data, the accuracy of personal data, its sufficiency and, where necessary, its relevance to the purposes of personal data processing shall be ensured. The Operator shall take the necessary measures to delete or rectify incomplete or inaccurate data and/or cause such measures to be taken.

5.7. The personal data shall be stored in a form enabling identification of the concerned personal data subject no longer than is required for the purposes of personal data processing, unless the personal data storage period is established by the federal law or by a contract to which the personal data subject is a party, beneficiary or guarantor. Processed personal data shall be destroyed or depersonalized upon achieving the purposes of its processing or in cases where the achievement of these purposes becomes moot, unless otherwise envisioned by the federal law.

## **6. Purposes of personal data processing**

Purpose of processing	granting the User access to the services, information and/or materials contained on the website
-----------------------	-------------------------------------------------------------------------------------------------

Personal data	data collected through metric programs, cookies
---------------	-------------------------------------------------

Legal grounds	Consent to personal data processing
---------------	-------------------------------------

Types of personal data processing	Collection, systematization, storage, extraction, transfer, destruction, other actions, recording, accumulation, use, rectification, deletion.
-----------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------

Purpose of processing	Market promotion of goods, works and services
-----------------------	-----------------------------------------------

Personal data	last, first and middle names
---------------	------------------------------

email address

phone number

position

company's name

Legal grounds	Consent to personal data processing
---------------	-------------------------------------

Types of personal data processing	Collection, systematization, storage, extraction, transfer, destruction, other actions, recording, accumulation, use, rectification, deletion.
-----------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------

Purpose of processing	Feedback from website users
-----------------------	-----------------------------

Personal data	last, first and middle names
---------------	------------------------------

email address

phone number

Legal grounds	Consent to personal data processing
Types of personal data processing	Collection, systematization, storage, extraction, transfer, destruction, other actions, recording, accumulation, use, rectification, deletion.
Purpose of processing	Subscription to receive email notifications
Personal data	name email address
Legal grounds	Consent to personal data processing
Types of personal data processing	Collection, systematization, storage, extraction, transfer, destruction, other actions, recording, accumulation, use, rectification, deletion.
Purpose of processing	Granting access to the User's personal account on the website
Personal data	last, first and middle names email address phone number location (country) company's name company's core business position authentication data (login, password)
Legal grounds	Consent to personal data processing
Types of personal data processing	Collection, systematization, storage, extraction, transfer, destruction, other actions, recording, accumulation, use, rectification, deletion.

## **7. Conditions of personal data processing**

7.1. Personal data shall be processed upon the consent of the concerned personal data subject to the processing of their personal data.

7.2. Personal data processing is necessary to achieve the purposes stipulated by an international treaty of the Russian Federation, or by the law, to discharge the functions, powers and duties imposed upon the Operator by the law of the Russian Federation.

7.3. Personal data processing is necessary for the administration of justice, execution of a judicial act, act of another body or official enforceable pursuant to the law of the Russian Federation on enforcement proceedings.

7.4. Personal data processing is necessary for the purposes of executing a contract to which the personal data subject is a party, beneficiary or guarantor, as well as for the purposes of concluding a

contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor.

7.5. Personal data processing is necessary to exercise the Operator's rights and legitimate interests or those of third parties or to achieve socially significant purposes, provided that the rights and freedoms of the concerned personal data subject are not violated.

7.6. The personal data to which an unlimited number of persons have had access granted by the concerned personal data subject or at their request (hereinafter referred to as "publicly available personal data") shall be processed.

7.7. The personal data subject to publication or mandatory disclosure in accordance with the federal law shall be processed.

## **8. Procedure for collection, storage, transfer and other types of personal data processing**

The security of the personal data processed by the Operator shall be ensured through implementation of the legal, organizational and technical measures necessary for full compliance with the requirements of the applicable law in the field of personal data protection.

The Operator shall take the measures necessary and sufficient to ensure the fulfillment of the obligations stipulated by the laws of the Russian Federation and the regulatory legal acts adopted in accordance therewith. The Operator shall independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations stipulated by the Federal Law "On Personal Data" and the regulatory legal acts adopted in accordance therewith, unless otherwise provided by this law or other federal laws.

8.1. The Operator shall ensure the safekeeping of personal data and take all possible measures to exclude access to personal data by unauthorized persons.

8.2. The User's personal data shall never, under any circumstances, be transferred to third parties, except in cases related to the execution of the applicable law or if the concerned personal data subject has given consent to the Operator to transfer said data to a third party for the fulfillment of obligations under the relevant civil law contract.

8.3. If any inaccuracies are detected in personal data, the User may update it independently by sending the respective notice to the Operator's e-mail address at: [info@index1520.com](mailto:info@index1520.com) marked "Personal Data Update."

8.4. The effective term of personal data processing shall be determined by achieving the purposes for which the relevant personal data was collected, unless any other effective term is stipulated by the respective contract or applicable law.

The User may revoke their consent to personal data processing at any time by sending the respective notice to the Operator's email address at: [info@index1520.com](mailto:info@index1520.com) marked "Revocation of Consent to Personal Data Processing."

8.5. All information that is collected by third-party services, including payment systems, means of communication and other service providers, shall be stored and processed by the specified persons (Operators) in accordance with their User Agreement and Privacy Policy. The concerned personal data subject and/or User shall be obliged to familiarize themselves with these documents. The Operator shall not be held liable for the actions of third parties, including the service providers specified in this clause.

8.6. The prohibitions established by the personal data subject on the transfer (except for granting access), as well as on the processing or conditions of processing (except for obtaining access) of personal data authorized for dissemination shall not apply in cases of personal data processing in the state, social and other public interests defined by the law of the Russian Federation.

8.7. Under the processing of personal data, the Operator shall ensure its confidentiality.

8.8. The Operator shall store personal data in a form enabling identification of the concerned personal data subject no longer than is required for the purposes of personal data processing, unless the personal data storage period is established by the federal law or by a contract to which the personal data subject is a party, beneficiary or guarantor.

8.9. A condition for the termination of personal data processing may include achievement of the purposes of personal data processing, expiration of the personal data subject's consent, revocation of the personal data subject's consent or their request for the termination of personal data processing, as well as the discovery of unlawful personal data processing.

## **9. List of actions to be performed by the Operator with the obtained personal data**

9.1. The Operator shall collect, record, organize, accumulate, store, rectify (update, change), extract, use, transfer (disseminate, provide, grant access to), depersonalize, block, delete and destroy personal data.

9.2. The Operator shall carry out the automated processing of personal data with or without receiving and/or transmitting the received information via information and telecommunications networks.

## **10. Cross-border transfer of personal data**

10.1. The Operator shall not engage in the cross-border transfer of data.

## **11. Confidentiality of personal data**

The Operator and other persons who have gained access to personal data shall be obliged to refrain from disclosing such personal data to third parties or otherwise disseminating it without the consent of the concerned personal data subject, unless otherwise provided by the federal law.

## **12. Concluding provisions**

12.1. The User may obtain any clarifications on issues of interest regarding the processing of their personal data by contacting the Operator via e-mail at: [info@index1520.com](mailto:info@index1520.com).

12.2. This document shall reflect any and all changes to the Operator's Personal Data Processing Policy. The Policy shall remain valid indefinitely until replaced by a new version.

12.3. The current version of the Policy is freely available on the Internet at: <https://index1520.com/policy/>