



## Privacy Policy and Organization of Personal Data Processing

### Terms and Definitions:

**Website Owner** — Mining Element JSC, a legal entity established on January 24, 2017, under the laws of the Russian Federation, registration number 1177847015774, located at Saint Petersburg, Vvedensky Canal St., 4, Building 1, 191180.

**Website User** — An individual or legal entity (or its representative) intending to access information on the Website, purchase goods, order services, or use personalized Website services via a personal account.

**Website** — Resources available online

at: <https://miningelement.com/>, <https://ru.miningelement.com/>, comprising information, texts, graphic elements, design, images, photos, videos, and other intellectual property, as well as computer programs contained in an information system ensuring online accessibility, for which the Website Owner holds exclusive rights.

**Mobile Applications** — The Website Owner's applications for iOS and Android platforms that utilize Website resources.

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### 1. General Provisions

1.1. This Privacy Policy and Organization of Personal Data Processing (hereinafter, the "Policy") is established by AO "Mining Element" (hereinafter, the "Website Owner") in accordance with:

1.1.1. Federal laws and regulations governing the operator's activities, including:

- The Labor Code of the Russian Federation;
- Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006;
- Federal Law No. 149-FZ "On Information, Information Technologies, and Information Protection" dated July 27, 2006;
- Decree of the Government of the Russian Federation No. 1119 "On Approval of Requirements for the Protection of Personal Data During Their Processing in Personal Data Information Systems" dated November 1, 2012;
- Order No. 55/86/20 of the FSTEC, FSB, and Ministry of Communications of Russia "On Approval of the Procedure for Classifying Personal Data Information Systems" dated February 13, 2008 (registered by the Ministry of Justice of the Russian Federation on April 3, 2008, No. 11462).

1.1.2. The operator's internal documents, including its Charter, this Personal Data Processing Policy, Orders appointing responsible personnel for organizing personal data processing, and Orders on implementing legal, organizational, and technical measures to ensure personal data security.

1.1.3. Civil and labor agreements between the operator and personal data subjects.

1.2. This Policy applies to personal data obtained before and after its adoption.

1.3. This Policy is a publicly available document outlining the principles of the Website Owner's activities in processing and protecting personal data.

1.4. By using the Website, the User unconditionally agrees to this Policy, including the scope of personal data provided, processing conditions, and withdrawal procedures. If the User disagrees, they must refrain from using the Website.

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### JSC Mining Element

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Phone: +7(812)900-85-70, [pro@miningelement.com](mailto:pro@miningelement.com)  
[www.miningelement.com](http://www.miningelement.com)



## 2. Personal Data Processed by the Website Owner

### 2.1. The Website Owner may collect the following User data:

- Personal information provided during registration (name, position, employer, mobile number, email, social media accounts);
- Technical data (IP address, cookies, pixel tags, browser/software/hardware information);
- Date and time of Website access;
- Usage activity (search history, email correspondence with the Website Owner, email content, attachments);
- Geolocation data;
- Other necessary information (including data received from partners).

2.2. The Website Owner does not process special categories of personal data (race, ethnicity, political views, religious/philosophical beliefs, health, or intimate life).

2.3. The Website Owner does not transfer personal data across borders.

2.4. Decisions affecting Users' rights are not made solely via automated processing.

2.5. This Policy applies only to the Website. The Owner is not responsible for third-party sites linked on the Website.

2.6. The Website does not verify User-provided data but assumes its accuracy.

2.7. Processing and storage periods comply with Russian law.

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## 3. Purposes of Processing Personal Data

### 3.1. Processing purposes include:

- Fulfilling agreements with Users (e.g., identity verification, refunds, product replacement);
- User registration and access to Website sections;
- Communication (notifications, requests, responses);
- Analytics to improve Website services;
- Statistical research using anonymized data;
- Marketing campaigns, targeted advertising;
- Providing access to Website resources/services;
- Informing Users about new products/offers;
- Developing new products;
- Legal compliance and protecting Users' rights.

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## 4. Conditions for Processing Personal Data

4.1. Data is stored per this Policy, service terms, and internal regulations.

4.2. Confidentiality of User data is ensured.

4.3. Data may be shared with third parties if:

- The User consents;
- Necessary for service provision (e.g., refunds);
- Required by law;
- During business transfers;
- To protect the Owner's or third parties' rights.

4.4. Inaccurate data or legal violations may result in account blocking.

4.5. Users may contact the Owner to address disputes or complaints.

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## 5. Website Owner's Guarantees

5.1. The Owner ensures confidentiality and legal compliance in data processing.

5.2–5.10. Security measures include:

- Restricted access to data and premises;

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- Appointed data security officers;
  - User guidelines for data handling;
  - Access control and activity logging;
  - Protection against unauthorized access/malware;
  - Regular backups;
  - Audits of security systems.
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## 6. User's Guarantees

- 6.1. The User guarantees accurate and updated information.
  - 6.2. The User agrees to use the Website lawfully, without infringing third-party rights.
  - 6.3. The Owner may reject User content at its discretion.
  - 6.4. The User consents to this Policy and data processing.
  - 6.5. The User must notify the Owner via email ([admin@miningelement.com](mailto:admin@miningelement.com)) about:
    - Changes to personal data;
    - Opting out of marketing;
    - Withdrawing consent or deleting an account.
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## 7. Policy Revisions and Approval

- 7.1. The Policy is enacted by the Website Owner's executive order.
- 7.2. The Owner may amend the Policy, with updates effective upon Website posting.
- 7.3. The current version is available in the Website's "Information" section.

Update Date: February 21, 2025