

# **PRIVATE POLICY**

## **for use of the LOGIS Mobile Application**

Effective date: July 5, 2021

### **1. INTRODUCTION**

**LOGIS GROUP** provides logistics and procurement services to international majors in Oil & Gas, Energy, and Trading sectors.

LOGIS GROUP particularly includes LOGIS S.A.S., LNGS OOO and their subsidiaries and affiliates.

For the purposes of this Policy LOGIS Group includes only LOGIS SAS (address: 21, Boulevard Haussmann,75009, Paris, France) and LNGS, OOO (address: 113/1, Leninsky ave, 117198, Moscow, Russian Federation) (collectively called **“LOGIS”, “us”, ”we”**).

This Privacy Policy applies to all visitors and anyone who accesses or uses our Mobile Application currently called LOGIS (“Application”).

Your privacy is very important to us. We are committed to processing your information in accordance with international legal standards, including the European Union’s General Data Protection Regulation (GDPR) and other applicable data protection laws and data protection codes of conduct. We have implemented the practices set out in this Privacy Policy for our Application. This Privacy Policy describes the way LOGIS treat all the personal data you provide or that LOGIS have obtained through the Application, describes how we use the information you provide when you use our services, and the choices you can make about our use of the information. We also describe the measures we take to protect the information and how you can contact us about our privacy practices.

As part of our commitment to protecting your personal data, we use this Policy to transparently inform you about the following:

- (a) what personal data we collect and process;
- (b) why and how your personal data is collected and used (also, “processed”) by LOGIS when you access and use the Application;
- (c) LOGIS’s role and responsibilities in this context as the legal entity deciding why and how your personal data is processed; and
- (d) what your rights are in relation to the above processing.

**BY ACCESSING THE LOGIS APPLICATION AND ACCEPTING THE STATEMENT WITH THE LINK OK, YOU AGREE AND CONTINUING TO ACCESS THE LOGIS MOBILE APPLICATION, YOU ACCEPT THE TERMS AND THE PROCESSING OF PERSONAL DATA DESCRIBED IN THE PRIVACY POLICY. IF YOU DO NOT AGREE, PLEASE REFRAIN FROM THE LOGIS MOBILE APPLICATION. YOU MAY WITHDRAW YOUR CONSENT AT ANY TIME. WE WILL THEN REFRAIN FROM FURTHER PROCESSING YOUR PERSONAL DATA IN COMPLIANCE WITH THE STATED BELOW.**

## **2. DEFINITIONS**

**Personal data** means any information relating to an identified or identifiable natural person (**data subject or user**); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier etc.

**Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, storage, use, transmission within LOGIS, erasure or destruction.

**Consent of the data subject** means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

**Personal data breach** means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed.

**Device** means a mobile technical device (smartphone, tablet or other device) that has access to the Internet, on which LOGIS Application is installed.

**Application** means the software that allows you to access the remote LOGIS software after its installation on devices. The exclusive right to the Application belongs to LOGIS.

## **3. THE PRIVACY PRINCIPLES**

Personal data processing at LOGIS is based on the following principles:

### ***Consent and choice***

- Presenting to the users the choice whether or not to send their personal data except where the users cannot freely withhold consent or where applicable law specifically allows the processing of personal data without the natural person's consent. The user's election must be freely given, specific and made on a knowledgeable basis;

- Informing users, before obtaining consent, about their rights under the individual participation and access principle;
- Providing users, before obtaining consent, with the information indicated by the openness, transparency and notice principle; and
- Explaining to users the implications of granting or withholding consent.

***Purpose legitimacy and specification***

- Ensuring that the purpose(s) complies with applicable law and relies on a permissible legal basis;
- Communicating the purpose(s) to users before the information is used for the first time for a new purpose;
- Using language for this specification which is both clear and appropriately adapted to the circumstances.

***Data processing limitation***

- Gathering of personal data to that which is within the bounds of applicable law and strictly necessary for the specified purpose(s).
- Deleting and disposing or anonymizing of personal data whenever the purpose for personal data processing has expired, there are no legal requirements to keep personal data, or whenever it is practical to do so.

***Use, retention and disclosure limitation***

- Limiting the use, retention and disclosure of personal data to that which is necessary in order to fulfil specific, explicit and legitimate purposes;
- Limiting the use of personal data to the purposes specified by LOGIS prior to receiving the data, unless a different purpose is explicitly required by applicable law;
- Retaining personal data only as long as necessary to fulfill the stated purposes (e.g. retaining personal data required for the period of the relevant contract between you and LOGIS, if applicable, any renewal period, depending on the terms and conditions of a contract), and thereafter securely destroying or anonymizing it;
- Retaining personal data for as long as necessary in order to fulfill legal obligations, comply with laws, resolve disputes, including in cases of litigation, proceedings, or investigations;
- Retaining personal data for as long as necessary in order to fulfill legitimate interests; and
- Locking (i.e. archiving, securing and exempting the personal data from further processing) any personal data when and for as long as the stated purposes have expired, but where retention is required in order to comply with applicable laws.

***Accuracy and quality***

- Ensuring that the personal data processed is accurate, complete, up-to-date (unless there is a legitimate basis for keeping outdated data), adequate and relevant for the purpose of use;

- Establishing control mechanisms to periodically check the accuracy and quality of personal data processing.

#### *Openness, transparency and notice*

- Providing users with clear and easily accessible information about LOGIS's Private Policy;
- Establishing procedures and practices with respect to the processing of personal data;
- Giving notice to users when major changes in personal data handling procedures occur.

## **4. PROCESSING OF PERSONAL DATA**

### **Data subjects (users)**

Subjects of the data processed by the Application are natural persons (users) who have installed the Application on a device and started using the Application in accordance with this Policy and for the purposes specified below.

Through its Application LOGIS never process "sensitive" personal data such as religion, political views, sexual preference, or health, or other special categories of personal data. We do not wish to receive any such data and will not request it from you.

The Application must be installed and used by an adult. We do not intend to process personal data of children, nor do we want to receive such personal information of children.

### **Purposes of personal data processing**

We process personal data directly from our data subjects through our Application with the explicit purpose only to verify an identity of a data subject to enable us to provide:

- a) access to functionality of the Application to track the delivery of cargo, receive tracking confirmation as to where their cargo is currently located and to monitor processes of all or a part of their supply chain in connection with fulfillment of LOGIS's contractual obligations;
- b) access to reports on a status of transportation, information and news about LOGIS and its subsidiaries and affiliates and the tariff calculator.

### **Types of personal data collected**

**We process only the following types of personal data of a data subject: a data subject's corporate email address and authorization data of a data subject's device.**

In conformity with the principle of data minimization, with the exception of corporate e-mail addresses, no data is collected or processed using the Application, through which a user of the Application can be directly or indirectly identified.

### **Information collected automatically through the Application**

The authorization data of a user's devices used by the Application does not allow to identify the owner of a device and cannot be attributed to a specific data subject.

We process information to identify your device for fraud prevention and diagnostic purposes such as any problems to settings, error reports including data as to the type and severity of the problem, details of software related to an error, contents of files you were using when an error occurred on the device.

### **Processing methods**

Using the Application, personal data may be processed by methods of collecting, recording, storing, using, transferring within LOGIS, destroying (erasing). Personal data processing is carried out by using automated means.

Personal data is confidential as well as protected and secured from personal data breach, and will not be transferred or disclosed outside our corporate group LOGIS other than to comply with legal or regulatory requirements or obligations in accordance with applicable law.

### **Security of personal data**

Your personal data will be secured by taking security measures that are commensurate with the sensitivity of the personal data processed. To this end, LOGIS maintains appropriate physical, technical, and administrative security measures with a view to protecting personal data against theft; accidental loss; unauthorised alteration; unauthorised or accidental access, processing, erasure, use, disclosure or copying; and/or accidental or unlawful destruction.

When we have provided (or you have chosen) a password allowing access to the Application, you are responsible for safeguarding it and keeping it confidential and you undertake not to allow it to be used by third parties. Unfortunately, the transmission of information through the internet is not completely secure. Although we will take all reasonable commercial measures to protect your personal data, we cannot guarantee the security of any personal information or data you disclose. You accept the inherent security implications of using the internet and to the extent permitted by applicable law, we will not be responsible for any personal data breach of security, unless we have been acting with gross negligence and only within the limitations in the terms and conditions of use for LOGIS Application, if any.

### **Transfer of personal data outside of your country**

Your personal data (as described above) may be transferred inside LOGIS only to the extent required for LOGIS to perform their obligations to you, or for you to access your Application, or for the purposes described above in this Policy, provided that such purposes are in accordance with applicable law, in particular to respond to law enforcement requests or discovery procedures, or where required or permitted by applicable law, court orders, government regulations, or government authorities.

## **Retention of personal data**

Personal data shall be retained for no longer than required period of time to fulfil the purposes for which it was collected and contractual obligations. The storage period may be established by the law or set forth by the consent provided to LOGIS by a data subject. In specific circumstances, and in accordance with applicable law, LOGIS may retain your personal data for longer periods of time, so that we have an accurate record of our dealings with you or to protect the legitimate interests of LOGIS. In all cases, where your information is no longer required, LOGIS will ensure it is disposed of in a secure manner.

## **5. CONSENT OF A DATA SUBJECT (USER)**

Before using the Application, a user undertakes to familiarize himself with the text of this Policy. If a user does not agree with any of its individual provisions or with the Policy in a whole, he/she is obliged to stop any use of the Application. Expressing his consent to the terms of the Policy in accordance with this Section and in conjunction with the fact of continuing to use the Application, a user thereby unconditionally and fully agrees to all the terms of this Policy.

The actual beginning of a user's use of the Application is an expression of a user's consent to the terms of the Policy and acceptance of its terms within the meaning and in accordance with the applicable law. With each use of the Application, a user agrees to the terms of the Policy as amended at the time of actual use of the Application.

By accepting the terms of this Policy, in accordance with the procedure established in this Section, a user, by his own will and in his own interest, gives a consent and grants LOGIS the right:

- for automated processing, collection, recording, storage, use, transfer within LOGIS, destruction (erasure) of a user's email address and other data specified in Section “Types of personal data collected”;
- to send information about news of LOGIS and its subsidiaries and affiliates to a user, as well as to send push-notifications about new reports on the status of transportation to a user who has an active transportation project and contractual obligations with LOGIS;
- to transfer a user's email address and other data specified in Section “Types of personal data collected” to LOGIS for processing by the methods and with the performance of actions specified in this Policy.

## **6. WITHDRAWAL OF CONSENT**

A user has the right and the opportunity to withdraw a consent at any time, without affecting the lawfulness of processing based on consent before its withdrawal by stopping the use of the Application, deleting it from a device, by changing the appropriate settings in the Application functionality or contacting LOGIS.

A user has the opportunity to exclude the processing of the e-mail address and authorization data of a user's device by selecting appropriate settings in the Application functionality.

We will apply your preferences going forward. In some circumstances, withdrawing your consent to LOGIS use or disclosure of your personal data will mean that you cannot take advantage of certain LOGIS services.

You have the right under applicable law to access, obtain a copy and correct personal data concerning you, subject to limited exceptions that may be prescribed by applicable law. Where justified and mandated by applicable law, you may also require that your personal data shall be deleted or blocked, or you may be entitled to obtain information about the processing of your personal data, or object to further processing of your data.

## **7. RIGHTS OF A DATA SUBJECT (OR USER)**

We respect your rights and aim to make sure that you are aware of your rights. Every data subject whose personal data is being processed by LOGIS has the following rights:

### **Access to personal data**

A data subject has the right to request the confirmation of his or her personal data processing. In case of such processing a data subject has the right to familiarize himself or herself with the personal data being processed, as well as with information about the purposes of processing, the categories of data being processed, the actions with the data, the receivers of the data and the guarantees when the data is transferred to third parties, the period of processing, the sources of the data, and whether decision-making is fully automated. A data subject also has the right to obtain the list of the personal data being processed.

### **Withdrawal of consent to personal data processing**

In those cases when LOGIS uses the consent of a data subject as a basis for processing their personal data, the data subject has the right to withdraw the consent at any time.

### **Changes in personal data**

A data subject has the right to demand changes in their personal data if there are inaccuracies in personal data being processed by LOGIS. Taking into account the purposes of data processing, a

data subject has the right to supplement the personal data, including by submitting an additional application.

### **Personal data processing limitations**

A data subject has the right to initiate limitations on processing of all or a part of their personal data if one of the following conditions is met:

- the accuracy of personal data is being contested by a data subject (limitation for the period necessary for LOGIS to confirm the accuracy of the personal data);
- unlawful personal data processing has been revealed, a data subject opposes deleting personal data and demand limiting the use thereof instead;
- LOGIS does not need the personal data for the purposes of processing any more, but a data subject needs the personal data for the purpose of substantiation, performance or as part of legal proceedings;
- A data subject opposes their personal data processing (limitation for a period necessary for LOGIS to confirm whether LOGIS's legal grounds for personal data processing prevail over the lawful claims of the data subject).

### **Deletion of personal data**

A data subject has the right to demand the deletion of their personal data from LOGIS's systems and/or other existing tangible media, if one of the following conditions is met:

- personal data is no longer required for the purposes for which they have been obtained;
- A data subject withholds the consent on the basis of which the processing has been carried out, if there are no other legal grounds for processing;
- A data subject opposes their personal data processing (if there are no prevailing legal grounds for the personal data processing);
- personal data is being processed unlawfully;
- personal data must be deleted to ensure compliance with a legal obligation in accordance with legislative requirements;
- at the moment of personal data collection a data subject is a minor citizen, and the data has been obtained with the consent from their legal representative for the provision of services using remote service channels directly for the minor person.

### **Data portability**

A data subject has the right to demand the list of their personal data provided to LOGIS for the processing thereof in a structured, uniform and machine-readable format, and to instruct LOGIS to transfer their personal data to a third party in conformity with applicable law if LOGIS has a technical possibility to do so. In this case, LOGIS shall not be responsible for further actions of a third party related to the personal data.



### **Opposing personal data processing**

A data subject has the right to oppose processing of all or a part of the list of their personal data for the purposes indicated when the personal data was provided for LOGIS, except for the cases where legal grounds for personal data processing prevail over the interests, rights and freedoms of a data subject or where processing of personal data is necessary for substantiation, execution or defense in legal proceedings.

### **Filing complaints**

A data subject has the right to file to a supervisory authority in case LOGIS somehow violates their rights in relation to personal data processing. The complaint may be filed to supervisory authority of a country of the subject's permanent residence, a country of their work, or a country in which a subject believes their rights have been violated.

## **8. APPLICABLE LAW**

Within processing of personal data LOGIS is guided with the legislation applicable to LOGIS and applicable law of a country of a data subject, including the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (GDPR), the US legislation (California Consumer Privacy Act (CCPA), Virginia's Consumer Data Protection Act (CDPA) and other laws of States), the Russian Federal Law No. 152-FZ "On Personal Data" and other applicable law.

## **9. LOGIS CONTACTS REGARDING PERSONAL DATA**

You can send your written comments, questions or concerns to:

LOGIS S.A.S. (Headquarters, Europe)

Attention: Mikael Djurovic

21, Boulevard Haussmann, 75009, Paris, France

Phone +331 56 03 67 75, Fax+331 56 03 65 65

e-mail: [info@logisgroup.org](mailto:info@logisgroup.org)

LNGS, OOO

Attention: Stanislav Gavrilov

113/1, Leninsky ave., premise 209 D, 117198, Moscow, Russian Federation

Phone: +7 495 995 8224

e-mail: [transport@logisgroup.net](mailto:transport@logisgroup.net)

## **10. CHANGES TO THIS PRIVACY POLICY**

This Policy may be changed because of changes in legislation, the requirements of the authorities or to reflect changes in our practices concerning the processing of personal data. Changes and amendments to the terms of this Policy may be made at any time and shall apply as soon as they are published on LOGIS websites and the Application. Should you not agree to any changes or amendments, then you should refrain from continuing to use the Application and delete it from your device.