



"АЛРОСА" акционерной компания (аһаҕас акционерной уопсастыба) **Акционерная компания "АЛРОСА"** (публичное акционерное общество) **ALROSA** Public Joint Stock Company

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PRIVACY POLICY

DATE OF LAST UPDATE: OCTOBER 1, 2018

ABOUT WWW.LUMINOUSDIAMONDS.COM AND PRIVACY POLICY

This policy concerning the processing and protection of personal data (hereinafter the "Policy") of PJSC ALROSA registered at 6, ul. Lenina, Mirny, Mirny Ulus (District), 678175, Republic of Sakha (Yakutia) (hereinafter the "Company", the "Website Administration", "we") was developed to comply with requirements of the Russian legislation on the processing of personal data of data subjects on the resource located at www.luminousdiamonds.com (hereinafter the "Website").

The Policy of the Company was developed according to the following regulations of the Russian Federation:

- Constitution of the Russian Federation;
- Labor Code of the Russian Federation;
- Civil Code of the Russian Federation;
- Federal Law No. 160-FZ of December 19, 2005 "On the Ratification of the Convention of the Council of Europe for the Protection of Individuals with regard to Automatic Processing of Personal Data";
- Federal Law No. 152-FZ of July 27, 2006 "On Personal Data";
- Federal Law No. 149-FZ of July 27, 2006 "On Information, Informational Technologies and the Protection of Information";
- Decree of the President of the Russian Federation No. 188 of March 6, 1997 "On the Approval of the List of Confidential Information" and other regulations of the Russian Federation with regard to the protection of information and personal data;
- EU General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of April 27, 2016 - "GDPR")

This Privacy Policy relates to the information the Company collects and the reasons why the Company needs this information, and how the Company can use and share this information. The Website and services provided by www.luminousdiamonds.com are intended only for use by persons aged 18 years and older.

Contact PJSC ALROSA if you have any questions about this Privacy Policy, including the exercise of your legitimate rights: dataprotection@alrosa.ru

1. DEFINITION OF TERMS

1.1 This Privacy Policy uses the following terms:

1.1.1. "Website Administration" means employees authorized to administer the website, acting on its behalf, which organize and (or) carry out the processing of personal data and determine the purposes of personal data processing, scope of personal data to be processed, actions (operations) with personal data.

1.1.2. "Personal Data" means any information relating to an identified (whether directly or indirectly) or identifiable individual (data subject).

1.1.5. "Controller" means an individual or a legal entity, which organizes and carries out the processing of personal data and determines the purposes and scope of the processing of personal data.

PJSC ALROSA means the Controller, which alone or jointly with others, organizes and (or) carries out the processing of personal data and determines the purposes of personal data processing, scope of personal data to be processed, actions (operations) with personal data.

1.1.6. "Automatic Processing of Personal Data" means the processing of personal data by automated means;

1.1.16. "Data Subject" means an individual whom the relevant personal data refers to.

1.1.19. "Website User (hereinafter the "User", "you")" means a person having access to the website by means of the Internet and using it for own purposes.

1.1.20. "Cookies" are small data files sent by the web server and stored on the computer of the user, which the web client or the web browser sends every time to the web server as HTTP response when opening a page of the corresponding website.

1.1.21. "IP Address" means a unique address for site in the computer network built under the IP protocol.

2. GENERAL PROVISIONS

2.1. The use of the Website by the User implies its consent with the Privacy Policy and conditions of the processing of User's personal data.

2.2. In the event of any disagreement with conditions of the Privacy Policy, the User must stop using the Website.

2.3. This Privacy Policy applies only to this website. The Website Administration shall not control and be held liable for websites of third parties, which the User can visit following links available on this Website.

2.4. The Website Administration shall not verify the personal data provided by the Website User.

2.5. The databases of information containing personal data are placed in the territory of the Russian Federation.

3. SUBJECT MATTER OF THE PRIVACY POLICY

3.1. This Privacy Policy sets forth the commitment of the Website Administration not to intentionally disclose personal data, which the User provides upon various requests from the Website Administration (for example, when signing up for the website account, making an order, subscribing for news, etc.).

3.2. Personal data allowed for processing by this Privacy Policy is provided by the User through special forms filled out on the Website and usually includes the following information:

3.2.1. information provided by the User: you provide us with the personal information when you sign up for an account on our Website, make an order, fill out any online forms (including the sign-up form, forms of feedback, surveys), confirm a subscription for our newsletter and special offers, participate in the activity connected with social networks, or contact us directly (by means of email, phone, chat, through social networks, etc.).

The information you provide can include your name, address or location, phone number or e-mail, date of birth, sex, information about orders, your purchase preferences, photos and financial information (including your credit or debit card data; please bear in mind that we do not store this data, it is retained only by payment systems).

3.2.2. information which the Website Administration collects from other accounts or sources: we can collect your personal information from other sources, such as your accounts on third-party websites, including intermediary websites, social networks, ad networks, analytical companies and providers of payment and delivery services.

We supplement the data you provide by means of additional information, such as public and social columns to offer the most interesting content or promotions for you. We add this data to already available information on the existing account of the user to better understand preferences of a customer, provide relevant recommendations for the choice of goods and interesting adverts, improve the safe use of our Website for our customers, and fulfill our legal obligations, including the law on sanctions. This information can be referred to your personal data, such as name, e-mail address, legal and actual residence, phone number.

3.2.3. information about the User collected by information systems: every time you visit the Website certain information is created, which is saved by information systems of the Company, including cookies, type of a device used, IP address of a device, browser used, provider of communication services (for mobile devices), pages visited, time zone, country and location, and a report on loading failures and errors.

4. USE OF PERSONAL DATA

4.1. The Website Administration can use personal information about the User to:

4.1.1. Identify the User registered on the website for placing a purchase order and (or) signing the Contract.

4.1.2. Provide the User with access to the personalized website resources.

4.1.3. Interact with the User, including sending notifications, inquiries concerning the use of the website, delivery of services, processing of inquiries and requisitions from the User.

- 4.1.4. Find out the location of the User for safety, prevention of fraud.
- 4.1.5. Verify reliability and completeness of personal data provided by the User.
- 4.1.6. Create an account for purchases if the User has agreed to have an account.
- 4.1.7. Inform the Website User about the Order status.
- 4.1.8. Process and receive payments, confirm tax or tax benefits, contest payment, determine the User's right to a credit line.
- 4.1.9. Provide effective client and technical support to the User that experiences problems connected with the use of the website.
- 4.1.10. Provide the User after obtaining consent with updates of products, special offers, information about prices, newsletter and other data on behalf of the website or on behalf of partners of the website.
- 4.1.11. Perform advertising after obtaining User's consent. You can cancel marketing subscription by changing settings of your preferences in the account profile or following instructions specified in a letter.
- 4.1.12. Provide the User with access to third-party websites or services of partners of this website for obtaining their offers, updates or services.
- 4.2. The User's personal data is processed without term limits, in every lawful way, including in information systems of personal data with or without the use of automated means.
- 4.3. The User agrees that the Website Administration has the right to disclose personal data to third parties, in particular, courier services, organizations of postal service, telecommunications operators, only for handling User's requisitions issued on the website under a Public Offer Contract.
- 4.4. User's Personal Data can be disclosed to authorized bodies only on the grounds and in the manner prescribed by current legislation.
- 4.5. The Company has the right to supplement, match and combine the obtained personal information with information about the User received from other sources.
- 4.6. The Company has the right to aggregate personal information of the User with information about other buyers, creating a database about the use of the Website, orders of goods and other generalized information about buyers, based on legitimate interests, for the purpose of the best understanding of demand for any goods and the delivery of services in general.
- 4.7. The Website contains links to other web resources, where you can find information, useful and interesting to users of the Website, including links to such resources as:
<https://www.facebook.com>; <https://twitter.com>; <http://www.youtube.com>. However, effectiveness of this Policy does not apply to such other websites. Users following the links to other websites are recommended to read the data processing policies posted on such websites.

5. ACCESS TO PERSONAL DATA

- 5.1. To ensure the work of the Website and delivery of services according to the above purposes, the Company has the right to store and transfer personal data received from Users outside the

USA, the People's Republic of China and the European Economic Area to affiliated legal entities of the Company, as well as to partners which cooperate with the Company:

5.1.1. to Company's representative offices for commercial purposes: information about full structure of the company is posted on the website <http://www.alrosa.ru> We may provide your personal data for running our business, ensuring the use of the Website and delivering our services to you. These companies use your personal information consistent with this Privacy Policy;

5.1.2. to third parties which render services for the Company to supplement the available information and to further deliver services and goods:

- Courier companies which we cooperate with to ensure delivery of the goods ordered by you. For this purpose they need access to your order data, including your name and address. These service providers work worldwide, cooperating with many local companies, which can be involved in delivery to your address;
- Payment service providers which we cooperate with to facilitate your payments (including information about your credit/debit card).
- Companies providing credit check and fraud prevention services secure your and our safety. We provide them with access to personal data and made orders to recognize frauds.
- Analytical companies and developers of search engines that help us improve and optimize the Website.
- Providers of marketing tools that promote commercial activity.
- Performance-marketing providers rendering services in advertising, which matches your needs and interests.
- Providers of plug-ins or similar technologies that help us trace traffic, partner boutiques and other providers.
- Research companies which we cooperate with to conduct surveys concerning usability of our Website and provided services.
- IT providers for IT support of our Website and storage of your data.

5.2.

Many of the above recipients of Personal Data are located in the territory of the Russian Federation, the European Union / European Economic Area and in other states. However in certain events, Personal Data can be transferred outside the European Economic Area, including to the countries, where there is no such high level of Personal Data protection that is established in the European Economic Area, and countries not subject to decisions of the European Commission. If Personal Data has to be transferred to one of such countries, the Company, as required according to the current data protection legislation, will ensure an adequate level of data protection by means of any recognized legal mechanism, for example, EU-US Privacy Shield, so-called Standard Contractual Clauses published by the European Commission or Binding Corporate Rules. Please bear in mind that such recognized legal mechanism is not required when

transfer is intended to perform a contract signed for the benefit of the User between the Company and other individual or legal entity (and to conclude such contract), such as third-party service providers specified in item 5.1.2.

In cases when the Company carries out cross-border transfer of Personal Data to affiliated legal entities of the Company, the Company undertakes to meet so-called Standard Contractual Clauses to ensure an adequate level of data protection.

6. COOKIES

6.1. The Website uses cookies to collect information and maintain your purchase preferences. Cookies are small data files sent by the web server to the web browser, enabling the server to authenticate the browser on each page.

6.2. The Website uses the following categories of cookies:

6.2.1. **STRICTLY NECESSARY COOKIES.** These cookies are necessary for use of the Website and its features. Without these cookies services you have asked for, like login storing or shopping baskets, cannot be provided.

6.2.2. **PERFORMANCE COOKIES.** These cookies collect anonymous information about your network behavior on the Website. For example, we use Google Analytics cookies in order to better understand how buyers find our website, use it and what pages they visit, as well as to further improve navigation of the website, convenience of shopping and placement of marketing campaigns. Data received by means of these cookies does not contain any personalized data, through which you could be identified. You may opt out of these cookies by changing settings of your browser.

6.2.3. **FUNCTIONALITY COOKIES.** These cookies remember your choice of a country, language and parameters of search, such as size, color or line of goods in order to make the use of the website simple and convenient for you. Information collected by these cookies is anonymous and is not transferred to third-party websites. You may opt out of these cookies by changing settings of your browser.

6.2.4. **TARGETING OR ADVERTISING COOKIES.** These cookies collect information about your network behavior and habits to deliver adverts relevant to your interests and needs. They are also used to limit the number of times you see an advertisement and measure its effectiveness. These cookies are usually placed by third-party advertising networks. They remember the sites you have visited, and share this information with third parties, such as advertisers. For example, we cooperate with third-party companies to deliver you personalized adverts when you visit other websites. You may opt out of these cookies by changing settings of your browser.

6.2.5. **SOCIAL COOKIES.** These cookies allow you to share any information from the website on social networks. Detailed information about privacy policy and use of cookies in this case is posted on the respective websites of social networks.

If you want to remove all cookies from your computer, please contact the support service of your Internet browser to get further instructions. Information about removal and control of cookies is available on the website www.AboutCookies.org. Please bear in mind that removal of cookies or refusal of future use will make the use of some areas of the Website impossible.

6.3. The User may withdraw its consent to use these cookies any time, using the following options:

- Google Analytics cookies on all websites - switch to the Google Analytics Opt-out Browser Add-on page;
- cookies of third parties related to behavioral targeting - go to www.youronlinechoices.eu.
- other types of cookies - they can be removed through browser settings.

6.3.1. The refusal of cookies does not mean that the User will not receive further online adverts.

7. SECURITY

7.1. The Company takes a certain number of actions to protect personal information provided by Users:

7.1.1. Transport Layer Security Protocol (SSL) is used to encrypt your personal data provided by the User when making an order;

7.1.2. a unique login and a password are created and transferred to Users when they undergo registration and log into the Website;

7.1.3. the Website does not retain information about Users' credit or debit cards, which could enable third parties to use them (for example, the CVV).

7.2. Personal Data is processed in the manner that ensures the adequate security of personal data, including protection against unauthorized or unlawful processing and accidental loss, damage or destruction by means of appropriate technical and organizational measures (integrity and confidentiality).

7.3. Where personal information is transferred by the User via other means of communication, excluding the Website, in the unprotected environment (such as email, SMS, online messages), data is not protected by systems of the Website and can be used by third parties.

8. YOUR PERSONAL DATA RETENTION PERIOD

8.1. The User's personal data is processed only until the above objectives of processing for which we have collected or received your Personal Data are achieved and information retention term set forth by the current legislation expires.

8.2. The User agrees that the Website Administration may transfer personal data to third parties, in particular, to courier services, organizations of postal service, telecommunications operators, only for handling User's orders made on the e-store Website www.luminousdiamonds.com, including delivery of Goods.

8.3. User's Personal Data can be disclosed to authorized bodies of the Russian Federation only on the grounds and in the manner prescribed by the Russian legislation.

8.4. The Website Administration takes necessary organizational and technical measures to protect personal information of the User against illegal or accidental access, destruction, change, blocking, copying, distribution and other illegal actions of third parties.

8.5. The Website Administration together with the User takes all necessary measures to prevent losses or other negative consequences caused by loss or disclosure of User's personal information.

9. RIGHTS AND SETTLEMENT OF DISPUTES

9.1. The User has the right to demand:

1.1.9. Confirmation of Personal Data processing, and in case of confirmation thereof, access to Personal Data;

9.1.2. Elimination of inaccuracies in Personal Data;

9.1.3. Destruction of Personal Data;

9.1.4. Termination of Personal Data processing;

9.1.5. Receipt of Personal Data, and free transfer of this Personal Data to other controller of personal data.

9.2. The Website Administration has the right:

9.2.1. To use the received information only for the purposes specified in item 4 hereof.

9.2.2. Not to disclose User's personal information, except for subitems 8.2. and 8.3. hereof.

9.2.3. To block personal data relating to the User after an application or request is sent by the User or its legal representative or body authorized to protect the rights of data subjects, for a check period, in case of detection of unreliable personal data or unlawful actions.

9.3. The Website Administration is held liable for deliberate disclosure of User's Personal Data according to the current legislation, except for cases provided by subitems 8.2., 8.3. and 9.4. hereof.

Persons guilty of violation of the rules regulating the receipt, processing and protection of personal data are subject to disciplinary, material, administrative, civil, criminal and other penalties stipulated by the Russian legislation.

9.4. In case of loss or disclosure of Personal Data the Website Administration is not held liable if such confidential information is:

9.4.1. Made public prior to its loss or disclosure.

9.4.2. Received from a third party before the Website Administration receives it.

9.4.3. Received by third parties through unauthorized access to files of the website.

9.4.4. Disclosed with the User's consent.

9.5. The User is responsible for legitimacy, accuracy and truthfulness of the provided Personal Data according to the current legislation.

9.6. Before filing a claim with court concerning disputes arising out of the relations between the Website User and Website Administration, a claim must be presented (a written proposal to voluntarily settle a dispute).

9.7. The recipient of a claim notifies the claimant, in writing, within 30 calendar days after receiving a claim, of results of claim consideration.

9.8. If no agreement is reached, a dispute will be submitted to court as required by the current legislation.

9.9. The current legislation is applied to this Privacy Policy and the relations between the User and Administration of the website.

10. QUESTIONS AND COMMENTS

10.1. The Website Administration has the right to make changes to this Privacy Policy without the User's consent.

10.2. New Privacy Policy becomes effective from the time it is posted on the Website unless otherwise provided for by the revised Privacy Policy.

10.3. If you have questions or comments about this Privacy Policy, please email us to marketing@alrosa.ru.

10.4. All future changes to this Privacy Policy will be reported on this page. If necessary, we will notify you of these changes by e-mail. Please check your email for new letters to be aware of all changes and additions hereto.

11. ADDITION. EUROPEAN ECONOMIC AREA PRIVACY POLICY

A controller of personal data according to requirements of the EU General Data Protection Regulation and other national laws on data protection of EU member states, as well as other regulations on data protection is:

PJSC ALROSA

Legal address: 6, ul. Lenina, Mirny, ulus Mirninsky, Republic of Sakha (Yakutia), 678175

Tel: +7 495 620 9250

E-mail: info@alrosa.ru

Web: <http://alrosa.ru>

PJSC ALROSA (hereinafter the "Company", "we", "us", etc.) manages the website www.luminousdiamonds.com (hereinafter the "Website"). This Privacy Policy (hereinafter the "Policy") concerns persons (hereinafter the "Users", "you", "yours", etc., if applicable) visiting the Website and/or buying products of the Company (collectively referred to as the "Service"). Hereunder personal data means any information relating to an identified or identifiable individual. Identification is carried out by means of an identifier, for example, name, identification number, data on location, or online identifier, or on the basis of data set by the User.

Privacy of our Users is very important for us. We kindly ask you to get acquainted with this Policy before you begin to use the Service and provide your personal data. These rules can be changed, however information about any changes will be published, and changes themselves will extend only to future actions and information, without retroactive effect. We recommend you to check the Policy every time you visit the Website or use the Service to understand how the personal data provided by you can be used.

In case of receiving consent from the data subject to the processing of personal data, para 1 (a) of Art. 6 of the General Data Protection Regulation (GDPR) applies.

If personal data is processed to perform a contract to which the data subject is party, para 1 (b) of Art. 6 of the General Data Protection Regulation (GDPR) applies. The same concerns the processing procedures necessary for taking steps prior to entering into a contract.

If processing is necessary for compliance with a legal obligation to which our company is subject, para 1 (c) of Art. 6 of GDPR applies.

If processing is necessary in order to protect the vital interests of the data subject or of another individual, para 1 (d) of Art. 6 of GDPR applies.

If processing is necessary for the purposes of the legitimate interests pursued by our company or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject, para 1 (f) of Art. 6 of GDPR applies.

The Company is international, in this regard, we can get access to personal data from around the world, including from other countries, and transfer them. During the transfer of your personal data we use legitimate methods for transfer of personal data outside the European Economic Area and Switzerland, for example, EU Standard Contractual Clauses or Privacy Shield agreement. If you visit the Service inside the European Economic Area or other regions where the laws regulating the collection and use of data are effective, please bear in mind that, by providing the personal data, you understand that your personal data can be transferred to other countries where we run our business.