

Personal Data Processing and Protection POLICY of Caterpillar Financial OOO

Caterpillar Financial OOO is a financial division of Caterpillar Inc., a manufacturer of construction and mining equipment, gas turbine and diesel engines and industrial gas turbines, conducting its business in the territory of the Russian Federation and observing the rights to privacy, including personal and family privacy, and freedoms of citizens when processing their personal data (PD).

Caterpillar Financial OOO shall strictly adhere to the following principles of PD processing:

- PD are processed in compliance with the rules and regulations established in the current laws of the Russian Federation and internal regulations of Caterpillar Financial OOO (e.g., Personal Data Processing Guidelines).
- Processed PD set corresponds to the stated goals of PD processing.
- PD processing is not allowed if it can be incompatible with the goals of PD processing.
- Accurate, sufficient and, if required, up-to-date PD are assured in PD processing.
- PD are stored no longer than it is required for PD processing purposes and the requirements of federal laws, and a debt or duty to perform assumed by Caterpillar Financial OOO.

Personal data subjects

Caterpillar Financial OOO processes PD in respect of the following categories of PD subjects:

- Employees of Caterpillar Financial OOO
- Close relatives of employees of Caterpillar Financial OOO
- Job applicants to Caterpillar Financial OOO
- Customers (individual entrepreneurs) of Caterpillar Financial OOO
- Sureties (individual persons) of customers of Caterpillar Financial OOO
- Members of executive bodies of customers (legal entities) of Caterpillar Financial OOO
- Owners (individual persons) of customers (legal entities) of Caterpillar Financial OOO
- Representatives of contractors of Caterpillar Financial OOO

Goals of personal data processing

Depending on the PD origin, the goals of personal data processing are the following:

- Employees of Caterpillar Financial OOO: performance of obligations under labor contracts; HP records management; assistance with training and promotion of employees; provision of benefits; non-state pension schemes and private health insurance schemes; compliance with the requirements of the tax code of the Russian Federation.
- Close relatives of employees of Caterpillar Financial OOO: implementation of measures for the security of Caterpillar Financial OOO; issuing policies for private health insurance schemes; contact data for emergency cases.
- Job applicants to Caterpillar Financial OOO: performing activities related to personnel recruitment for Caterpillar Financial OOO.
- Customers (individual entrepreneurs) of Caterpillar Financial OOO; sureties (individual persons) of customers of Caterpillar Financial OOO; members of executive bodies of customers (legal entities) of Caterpillar Financial OOO; owners (individual persons) of customers (legal entities) of Caterpillar Financial OOO: credit analysis of potential customers; negotiation, conclusion and execution of lease contracts and other transactions; contact with customers regarding fulfillment (alteration, termination) of contractual obligations.
- Representatives of contractors (dealers, lessees, sureties, etc.): negotiation, conclusion and execution of lease contracts, surety agreements and other transactions; contact with contractors regarding fulfillment (including alteration and termination) of contractual obligations; issuing powers of attorney for acting on behalf of Caterpillar Financial OOO; issuing transfer and acceptance documents; maintaining financial and tax records.

In determining the PD set to be processed, Caterpillar Financial OOO shall be guided by the above-mentioned goals of personal data collection and processing.

Personal data processing timelines

Personal data processing timelines shall be determined depending on the specific goals of processing.

The time of personal data storage may be established in internal regulations of Caterpillar Financial OOO or an agreement with a personal data subject. However, such personal data shall be stored no longer than required for the purposes of PD processing as well as no longer than established by federal laws, regulations or a debt or duty to perform assumed by Caterpillar Financial OOO.

Actions performed on personal data

Depending on the processing purpose and category of PD and within the scope of the consent given by a PD subject or the scope of a commercial contract, Caterpillar Financial OOO may perform the following actions: collection, systematization, accumulation, storage, correction (updating, modification), use, depersonalization, blocking, and deletion.

Such actions may be performed using automatic means or without the use of such means.

Personal data confidentiality and the procedure of personal data transfer to third parties

Access to PD shall be restricted in accordance with federal laws and internal regulations of Caterpillar Financial OOO.

Caterpillar Financial OOO shall not disclose PD obtained by it as a result of its business activities.

Employees of Caterpillar Financial OOO who have been granted access to PD shall be under an obligation to ensure confidentiality of the processed PD as established:

- in the employment contract with a non-disclosure clause;
- in internal regulations of Caterpillar Financial OOO.

Access to PD processed at Caterpillar Financial OOO shall be granted to public authorities upon their request on the basis and in pursuance of laws and regulations.

Caterpillar Financial OOO shall transfer PD to third parties for processing in pursuance of federal laws of the Russian Federation, under contracts concluded between Caterpillar Financial OOO and PD subjects, or on the basis of a written consent from a PD subject.

Cross-border transfer of PD shall be carried out in accordance with the requirements of the federal laws of the Russian Federation, internal regulations of Caterpillar Financial OOO or based on a written consent from a PD subject.

Personal data security

Caterpillar Financial OOO uses the required technical and organizational measures to ensure data security in accordance with the current laws and regulations of the Russian Federation related to PD in order to protect such data from unauthorized access, modification, disclosure or deletion.

Rights and obligations of personal data subjects

Caterpillar Financial OOO takes reasonable measures for maintaining accurate and up-to-date PD to be processed as well as for data deletion if such data are deemed outdated, inaccurate or redundant, or if their processing goals have been accomplished.

PD subjects or their representatives shall be responsible for the accuracy of data provided to Caterpillar Financial OOO and the timely updating of provided data in case of any changes therein.

In issuing a request to Caterpillar Financial OOO, a PD subject shall have the right to perform the following:

- obtain information regarding processing of its PD (using the form given in Appendix 1);
- demand that any incomplete, inaccurate or outdated PD are made complete, corrected, depersonalized or deleted (using the form given in Appendix 2);
- withdraw its consent to PD processing (using the form given in Appendix 3);
- exercise other rights as provided by the current laws of the Russian Federation.

A request of a PD subject (or its representative) shall contain the following:

- number of the main document serving as proof of identity of a PD subject (a representative of a PD subject), document issue date, and issuing authority;

- data confirming that a PD subject has relationships with Caterpillar Financial OOO (contract number, signing date, designation and/or other information), or other data confirming the fact of processing of its PD in Caterpillar Financial OOO;
- signature of a PD subject (a representative of a PD subject).

If a request is submitted by a representative of a PD subject, the request shall contain proof of authority (a copy of the document) of such representative.

The laws may define restrictions and other conditions regarding the above-mentioned rights of a PD subject.

Contact data

All queries regarding the provisions of this Policy can be sent to Caterpillar Financial OOO:

- by mail at the address: 82 Sadovnicheskaya St., Building 2, 115035 Moscow;