

# OZON HOLDINGS PLC – INVESTOR RELATIONS PRIVACY POLICY (“IR Privacy Policy”)

Last Updated: 25-10-2021

## 1. ABOUT THE OZON HOLDINGS PLC AND THIS IR PRIVACY POLICY

We are Ozon Holdings PLC (“we”, “us”, “our”), and we are committed to protecting your privacy, together with its consolidated subsidiaries as a consolidated entity. We are a company registered in the Cyprus, with our principal office located at Arch. Makariou III, 2-4 Capital Center, 9th floor. Nicosia, 1065.

This IR Privacy Policy provides information on how we collect and use personal data on our investor relations website, available on the Internet at <https://corp.ozon.com> (the "Website").

## 2. WHAT INFORMATION DO WE COLLECT, AND HOW?

When you interact with us, whether by using our Website or communicating with us, we may collect the following information about you:

- **information you give us:** you may give us information about yourself if you sign up for our alerts, complete any online forms, or correspond with us by email. Depending on what you provide, this information can include your full name, location, email address and organizational affiliation.
- **information our IT systems collect about you:** each time you visit the Website, certain information will be created and recorded by our IT systems. That information includes:
  - **cookies:** you can see more details about cookies in section 6, but these small text files can help improve your experience with the Website and make it easier to interact with us. This may include storing your location or language preferences;
  - **device information:** the information provided by your device will differ depending on which type of device you are using (whether it’s a PC, Mac, iPhone, Android, or otherwise) and the settings on that device, but includes the type of device you have (such as an iPhone XS or Samsung Galaxy S9), the device’s IP address, the browser you are using, your mobile network provider (for mobile devices), the pages you have visited, your time zone and country location, and crash or download error reports.

## 3. WHAT DO YOU USE MY INFORMATION FOR?

- To email you the information and alerts you request. The legal basis is consent. You may withdraw your consent from our email communications by following the opt out instructions in the alert emails that are sent to you, or by following the opt out instructions below.
- To monitor the quality of our IR alerts, we collect cookie identifiers and, your contact history with us.
- To administer, maintain and optimise our Website and our services, we collect your device information (such as your device IP address and device type), Cookie identifiers and browsing information.

- To produce aggregated statistical reports.

#### 4. WHO DO YOU SHARE MY INFORMATION WITH?

To provide the Website, we work with a number of carefully selected third parties. To do this, we may share your information with these third parties in the following limited circumstances:

- **Group companies for business purposes:** We may share your personal information in order to operate our business and provide the Website and services. Rest assured, their use of information is consistent with this IR Privacy Policy;
- **Third party service providers for business purposes:** to function properly, we rely on a number of carefully selected third parties to provide us with services and products. We permit these companies to use your personal information only to the extent necessary to provide us with their services and products. Below you can find the types of third parties we use:
  - Analytics and search engine providers that we use to assist us in the improvement and optimisation of the Website.
  - IT/technology providers that we use to support, maintain and provide our technology and IT infrastructure that supports our Website and the storage of your information.
- **Third parties where we are considering a corporate transaction:** the Ozon Holdings PLC Group is always looking for new opportunities and directions in which to grow. This means sometimes we may consider corporate transactions such as merger, acquisitions, reorganisations, asset sale, or similar. In these instances, we may transfer your information to enable the assessment and undertaking of that transaction. If we buy or sell any business or assets, your personal information may be one of the assets that are transferred; and
- **To comply with legal requests:** on occasion we may be required to liaise with various regulators and law enforcement agencies in a number of different countries, whether as a result of law, a court order, or another legal process. Although we dispute requests wherever suitable, in some cases we may have to share your information with the regulators or law enforcement agencies. Where we consider it appropriate, and provided we are not prohibited from doing so by law or court order, we will attempt to notify you of these legal demands.

#### 5. TRANSFERS OF YOUR PERSONAL DATA

To provide our Website and send you alerts, in accordance with the purposes set out above, we will transfer and store the personal information that we collect from you to a destination outside of your country of origin (including outside the European Economic Area (“EEA”)). When your data to be transferred to entities or other third parties whose headquarters or place of data processing is not located in a member state of the European Union or the European Economic Area, we will ensure before forwarding the data that, outside of legally permitted exceptional cases pertaining to the recipient, either an appropriate level of data protection exists (e.g., through an adequacy decision of the European Commission, through suitable guarantees, or the agreement of EU standard contractual clauses between us and the recipient).

#### 6. COOKIES

We use technology such as "cookies" (small pieces of information sent by a web server to a web browser, which allows the server to uniquely identify the browser on each page) and similar technologies such as web beacons and pixel tags (which allow us to see how you interact with our Website or alerts) to collect information and store your online preferences.

We use the following categories of cookies on our Website:

- **CATEGORY 1: STRICTLY NECESSARY COOKIES** These cookies are essential in order to enable you to move around the website and use its features. Without these cookies, services you have asked for such as remembering your login details or shopping basket items cannot be provided.
- **CATEGORY 2: PERFORMANCE COOKIES** These cookies collect anonymous information on how you use our Website or our alerts. For example, we use Google Analytics cookies to help us understand how customers arrive at our site and we use web beacons to understand how we can improve our alerts. The data stored by these cookies does not show personal details from which your individual identity can be established.
- **CATEGORY 3: FUNCTIONALITY COOKIES** These cookies remember choices you make such as the country you visit our website from, language and search parameters. These can then be used to provide you with an experience more appropriate to your selections and to make the visits more tailored and pleasant. The information these cookies collect may be anonymised and they cannot track your browsing activity on other websites.

## 7. HOW LONG WILL YOU USE MY INFORMATION FOR?

We retain the data you provide to us for as long as you subscribe to our alerts, notwithstanding any superior retention period that we may be obliged to observe in accordance with legal requirements applicable to us.

## 8. WHAT ARE MY PRIVACY RIGHTS?

You have certain rights in relation to the personal data we hold about you, which we detail below. To exercise any of your rights, please contact us at [ir@ozon.ru](mailto:ir@ozon.ru).

- **Access.** You have the right to know whether we process personal data about you, and if we do, to access data we hold about you and certain information about how we use it and who we share it with. You can also request a copy of your information.
- **Portability.** In certain circumstances, you have the right to receive a subset of the personal data we collect from you in a structured, commonly used and machine-readable format and a right to request that we transfer such personal data to another party.
- **Correction.** You have the right to correct any personal data held about you that is inaccurate.
- **Erasure.** You may request that we erase the personal data we hold about you in the certain circumstances.
- **Restriction of Processing to Storage Only.** You have a right to require us to stop processing the personal data we hold about you other than for storage purposes in certain circumstances.
- **Objection.** In certain circumstances, you have the right to object to our processing of data about you.

- **Withdrawal of Consent:** You can withdraw your consent at any time by changing your alert preferences at the bottom of each email received or by emailing us as set out below.
- **Lodge a complaint with a supervisory authority** Office of the Commissioner for Personal Data Protection, at 1 Iasonos Street, 2nd Floor, 1082 Nicosia, tel. +357 22 818456, email address [commissioner@dataprotection.gov.cy](mailto:commissioner@dataprotection.gov.cy)).

## 9. QUESTIONS OR CONCERNS

If you have any questions or concerns about this IR Privacy Policy, please contact us in the first instance:

- by emailing us at [ir@ozon.ru](mailto:ir@ozon.ru)
- by writing to Ozon Holdings PLC – Privacy Team, at Arch. Makariou III, 2-4 Capital Center, 9th floor. Nicosia, 1065, Cyprus

## 10. UPDATES TO THIS POLICY

Any changes we may make to this IR Privacy Policy in the future will be posted on this page and, where appropriate, notified to you by email. Please check back regularly to keep informed of updates or changes to this IR Privacy Policy.