

PRIVACY NOTICE

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This privacy notice describes how **Polymetal International plc** (“we”, “us”, “**Polymetal**”) collects and processes personal information about you, how we use and protect this information, and your rights in relation to this information.

This privacy notice applies to all personal information that Polymetal collects or processes relating to Polymetal's business, including through Polymetal's website www.polymetalinternational.com. Personal information is information, or a combination of pieces of information that could reasonably allow you to be identified.

Employees, directors and contractors of Polymetal can review how Polymetal uses and discloses their personal information in Polymetal's Employee and Director Privacy Notice placed on the internal corporate website. You may also request a copy of the Employee and Director Privacy Notice from the Legal Director of the Polymetal's Cyprus Office.

1. PERSONAL INFORMATION WE USE

We will collect personal information about you from a variety of sources, including information we collect from you directly (e.g. when you contact us), and information we collect about you from other sources, such as public registers, data list brokers, marketing agencies, social media sites.

Note that we may be required by law to collect certain personal information about you, or as a consequence of any contractual relationship we have with you. Failure to provide this information may prevent or delay the fulfilment of these obligations. We will inform you at the time your information is collected whether certain data is compulsory and the consequences of the failure to provide such data.

1.1 Information we collect directly from you

The categories of information that we collect directly from you are:

- (a) personal details (e.g. name, date of birth)
- (b) contact details (e.g. phone number, email address, postal address or mobile number)
- (c) investor relations information such as your company name and position and remuneration details
- (d) information we collect automatically from you e.g. data collected using cookies and other device identifying technologies ('Cookies and Tracking Technologies') Further information about our use of Cookies and Tracking Technologies is available in the Cookies and Tracking Technologies section below.

1.2 Information we collect from other sources:

We collect information about you from private companies or institutions, public registers, social media sites.

The categories of information that we collect about you from other sources are

- (a) personal details (e.g. name, date of birth)
- (b) contact details (e.g. phone number, email address, postal address or mobile number)

2. HOW WE USE YOUR PERSONAL INFORMATION AND THE BASIS ON WHICH WE USE IT

We use your personal information to:

- (a) provide and personalise our services
- (b) deal with your enquiries and requests
- (c) comply with legal obligations to which we are subject and cooperate with regulators and law enforcement bodies
- (d) contact you with marketing and offers relating to products and services offered by us and other members of the Polymetal group (unless you have opted out of marketing, or we are otherwise prevented by law from doing so)
- (e) contact you with information about Polymetal including press releases, shareholder or other information
- (f) personalise the marketing messages we send you to make them more relevant and interesting

We must have a legal basis to process your personal information. In most cases the legal basis will be one of the following:

- (a) to fulfil our contractual obligations to you, for example to provide the services, to ensure that invoices are paid correctly. Failure to provide this information may prevent or delay the fulfilment of these contractual obligations.
- (b) to comply with our legal obligations, for example obtaining proof of your identity to enable us to meet our anti-money laundering obligations.
- (c) to meet our legitimate interests, for example to understand how you use our services and to enable us to derive knowledge from that enable us to develop new services. When we process personal information to meet our legitimate interests, we put in place robust safeguards to ensure that your privacy is protected and to ensure that our legitimate interests are not overridden by your interests or fundamental rights and freedoms.

We may obtain your consent to collect and use certain types of personal information when we are required to do so by law (for example, in relation to our direct marketing activities and the use of Cookies and Tracking Technologies). If we ask for your consent to process your personal information, you may withdraw your consent at any time by contacting us using the details at the end of this privacy notice.

3. YOUR RIGHTS OVER YOUR PERSONAL INFORMATION

You have certain rights regarding your personal information, subject to local law. These include the following rights to:

- access your personal information
- rectify the information we hold about you
- erase your personal information
- restrict our use of your personal information
- object to our use of your personal information
- receive your personal information in a usable electronic format and transmit it to a third party (right to data portability)
- lodge a complaint with your local data protection authority.

If you would like to discuss or exercise such rights, please contact us at the details below.

We encourage you to contact us to update or correct your information if it changes or if the personal information we hold about you is inaccurate.

We will contact you if we need additional information from you in order to honour your requests.

4. INFORMATION SHARING

We may share your personal information with third parties under the following circumstances:

- Service providers and business partners. We may share your personal information with our service providers and business partners that perform marketing services and other business operations for us. For example, we may partner with other companies such as travel agencies, hotels, transportation companies, banks, and business services providers.
- We work closely with other businesses and companies that fall under the Polymetal group known as Polymetal International plc and all of its direct and indirect subsidiaries. We may share your personal information with other Polymetal group entities for internal reporting purposes.
- Any law enforcement agency, court, regulator, government authority or other third party. We may share your personal information with these parties where we believe this is necessary to comply with a legal or regulatory obligation, or otherwise to protect our rights or the rights of any third party.
- Asset purchasers. We may share your personal information with any third party that purchases, or to which we transfer, all or substantially all of our assets and business. Should such a sale or transfer occur, we will use reasonable efforts to try to ensure that the entity to which we transfer your personal information uses it in a manner that is consistent with this Privacy Notice.

Because we operate as part of a global business, the recipients referred to above may be located outside the jurisdiction in which you are located. See the section on "International Data Transfer" below for more information.

5. INFORMATION SECURITY AND STORAGE

We implement technical and organisational measures to ensure a level of security appropriate to the risk to the personal information we process. These measures are aimed at ensuring the on-going integrity and confidentiality of personal information. We evaluate these measures on a regular basis to ensure the security of the processing.

We will keep your personal information for as long as you have a relationship with us. Once our relationship with you has come to an end, we will retain your personal information for a period of time that enables us to:

- Provide you with any continuing benefits such as pension or insurance
- Maintain business records for analysis and/or audit purposes
- Comply with record retention requirements under the law

- Defend or bring any existing or potential legal claims
- Deal with any queries or complaints you may have.

We will delete your personal information when it is no longer required for these purposes. If there is any information that we are unable, for technical reasons, to delete entirely from our systems, we will put in place appropriate measures to prevent any further processing or use of the data.

6. INTERNATIONAL DATA TRANSFER

Your personal information may be transferred to, stored, and processed in Russia and other countries that are not regarded as ensuring an adequate level of protection for personal information under European Union law.

We have put in place appropriate safeguards (such as contractual commitments) in accordance with applicable legal requirements to ensure that your data is adequately protected. For more information on the appropriate safeguards in place, please contact us at the details below.

8. COOKIES AND TRACKING TECHNOLOGIES

When you visit our website www.polymetalinternational.com (the "**Site**") we use "cookies" and other device identifying technologies (text files) which will be saved on your computer and which will allow an analysis of your use of the Site. Cookies refer to all technologies which store and access information on the device that you use to access the Site, such as your computer, tablet or mobile phone.

We use cookies to enhance the online experience of our visitors and to better understand how the Site is used. This information will be used to compile reports about the Site activities for the Site operator and will facilitate provision of additional services in relation to the Site and internet utilization. If you do not wish to receive "cookies", you may set your web browser to reject these, if your browser so permits.

The Site uses essential website cookies, which are necessary to provide you some of the features of the Site. You can control and delete these cookies through your browser settings, however if you choose to do so then you will not be able to use the full functionality of the Site.

The Site also uses the following functional cookies:

- Google Analytics
- Yandex Metrika
- 1C-Bitrix CMS

Functional cookies help us customize, maintain and improve our web services and assist in making the advertising you see on our Site relevant to you. The Site also keeps track of use activity via log files stored on our web servers. The log files include information on IP addresses, browser types and versions, pages viewed and entry and exit paths. Log files assist us in offering a personalized Site experience, diagnosing server problems, administering the website and tailoring information for the end-user.

You have the right to choose whether or not to accept cookies. However they are an important part of how our Site works, so you should be aware that if you choose to refuse or remove cookies, this could affect the availability and functionality of the Site.

Most browsers accept cookies by default. You may be able to change the settings to have your browser refuse certain cookies or notify you before accepting cookies. To do so, please follow the instructions provided by your browser which are usually located within the "Help", "Tools" or "Edit" facility.

9. CONTACT US

Polymetal International plc is the controller responsible for the personal information we collect and process.

If you have questions or concerns regarding the way in which your personal information has been used, please contact Legal Director of the Polymetal's Cyprus Office:

Parthenonos 6, 3rd floor, office 201,

3031, Limassol, Cyprus

Тел. +357 255 80 90

We are committed to working with you to obtain a fair resolution of any complaint or concern about privacy. If, however, you believe that we have not been able to assist with your complaint or concern, you have the right to make a complaint to the data protection authority of the country in which you are a resident using their website.

10. CHANGES TO THE NOTICE

You may request a copy of this privacy notice from us using the contact details set out above. We may modify or update this privacy notice from time to time.

If we change this privacy notice, we will notify you of the changes. Where changes to this privacy notice will have a fundamental impact on the nature of the processing or otherwise have a substantial impact on you, we will give you sufficient advance notice so that you have the opportunity to exercise your rights (e.g. to object to the processing).

February 1, 2019