JOHN DEERE FINANCIAL LLC POLICY ON PROCESSING AND ENSURING SECURITY OF PERSONAL DATA

Deere & Company, a global company with controlled affiliates in a number of jurisdictions (collectively, “John Deere”), has a Global Privacy Policy called the Enterprise Privacy Statement that sets out how it manages Personal Information (referred to herein as Personal Data) across all jurisdictions. This Privacy Policy for Russia is given on behalf of John Deere Financial LLC (hereinafter – the “Company”) and contains privacy information that is relevant when Personal Data are collected by the Company in Russia.

In case of direct contradiction of the present Privacy Policy and other documents, issued in accordance with the Federal Law #152-FZ of 27 June 2006 (hereinafter – “local documents”) to publicly available corporate policies of Deere & Company (hereinafter – “Corporate Policies”) as regards to Personal Data processing, local documents shall prevail and reflect accurately the processing of Personal Data by the Company. In case the Corporate Policies contain a general description of Personal Data processing that is not described by local documents, such processing does not take place in the Company.

Personal Data the Company Usually Collects and How It is Collected:

Clause 2 of the Enterprise Privacy Statement sets out where information may originate. In the case of the Company, the Company collects and process Personal Data the following categories:

- employees of John Deere Financial LLC;
- relatives of employees of John Deere Financial LLC;
- representatives of clients (contact persons, managers, chief accountants, shareholders, beneficiary owners, individual entrepreneurs)
- dealers' representatives;
- guarantors (surety);

As noted in Clause 7 of the Enterprise Privacy Statement, you may limit the Personal Data you provide to the Company. You should be aware, however, that if you choose not to provide certain Personal Data, this may affect the Company's ability to provide you a service or fulfill your request.

To support the business reputation and ensure compliance with the requirements of federal law, the Company considers its priority tasks to include ensuring the lawfulness of Personal Data processing in the Company's business processes and ensuring a due level of security for the Personal Data processed in the Company.
In accordance with the effective laws of the Russian Federation, it is a Personal Data processor with relevant rights and responsibilities. During organization and actual performance of Personal Data processing, the Company is guided by the requirements of Federal Law No. 152-FZ "On Personal Data" dated 27.07.2006 and the regulations adopted in accordance with it (hereinafter – laws of the Russian Federation on Personal Data processing).

**Purposes for Which The Company May Collect, Hold, Use and Disclose Personal Data:**

The Company will collect, use and disclose Personal Data as reasonably necessary for identified purposes and as permitted by law. These purposes may sometimes include those set out in Clauses 3 and 4 of the Enterprise Privacy Statement. Where required by law, the Company will obtain your consent. Personal Data are processed in the Company lawfully and fairly and is limited to the achievement of particular pre-defined lawful aims. Only the Personal Data that conforms to the goals of its processing is subject to processing. The content and scope of the Personal Data processed in the Company comply with the declared goals of processing, and no redundancy of processed Personal Data are permitted.

When Personal Data are processed in the Company, its accuracy, sufficiency, and, if necessary, relevance to the aims of Personal Data processing are ensured. The Company takes the necessary measures (ensures they are taken) to delete or update incomplete or inaccurate Personal Data.

The Company stores the Personal Data in a form that makes it possible to determine the Personal Data subject for no longer than is required by the aims of Personal Data processing if the term of Personal Data storage is not established by federal law or the agreement in which the Personal Data subject is a party, beneficiary, or guarantor. The processed Personal Data are destroyed or anonymized upon achievement of processing goals or if there is no longer a need to achieve these goals, unless otherwise specified by federal law.

The aims of the processing, composition, and content of the Personal Data, as well as the categories of Personal Data subjects whose data are processed in the Company, are set forth in the Company's notification of data processing sent to the authorized body for protection of Personal Data subjects' rights (Roskomnadzor) and are updated in case of changes. The Company does not process special categories of Personal Data and biometric Personal Data.

**Third Parties to Whom the Company May Disclose Personal Data:**

The Company may disclose your Personal Data for the purposes listed in Clauses 3, 4, and 10 of the Enterprise Privacy Statement or as otherwise permitted by applicable law, to third parties listed in Clause 4 of the Enterprise Privacy Statement. Where required by
law, the Company provides you with notice and obtains your consent prior to such disclosure. In the course of its activity, the Company may provide and/or entrust Personal Data processing to another entity upon the consent of the Personal Data subject, unless otherwise specified by federal law. A mandatory condition for provision and/or entrusting of Personal Data processing to another entity is the responsibility of the parties to ensure confidentiality and Personal Data security during its processing.

The Company does not publish the Personal Data of the Personal Data subject in publicly available sources without his/her prior consent.


In the course of its activity, the Company may perform a cross-border transfer of Personal Data to the territory of foreign states to foreign state authorities, foreign legal entities, or individuals. The issues of ensuring adequate protection of the rights of Personal Data subjects and ensuring the security of their Personal Data during cross-border transfer are a priority for the Company, and they are resolved in accordance with the laws of the Russian Federation on Personal Data processing.

The cross-border transfer of Personal Data to the territory of foreign states that do not ensure adequate protection of the rights of Personal Data subjects is only performed subject to the Personal Data subject's written consent to the cross-border transfer of their Personal Data or execution of an agreement where the Personal Data subject is a party, as well as in other cases stipulated by law.

**How Personal Data are Held and Protected:**

Personal data protection measures (legal, organizational, technical) are taken by the Company in order to protect processed Personal Data from illegal or accidental access to it from destruction, modification, blocking, copying, supply, and disclosure of Personal Data, as well as from other improper actions related to Personal Data.

The Company strives to ensure legal compliance of all measures taken by the Company related to organizational and technical protection of Personal Data, including in accordance with the requirements of the laws of the Russian Federation on Personal Data processing.

To ensure adequate Personal Data protection, the Company evaluates the harm that may be done to Personal Data subjects in case of a security breach of their Personal Data, and also determines actual threats to Personal Data protection during their processing in Personal Data information systems.
In accordance with the current threats detected, the Company applies the necessary and sufficient legal, organizational, and technical measures to ensure Personal Data security, which include the use of means of information protection, detection of unauthorized access to Personal Data and taking measures in response, Personal Data recovery, restriction of access to Personal Data, registration and accounting of actions with Personal Data, as well as control and evaluation of the effectiveness of measures taken to ensure Personal Data security.

The Company's management understands the importance and need to ensure Personal Data security and encourages constant improvement of the system to protect Personal Data that is processed as part of the Company's main activity.

The Company has appointed a person responsible for the organization of Personal Data processing.

Each new employee of the Company who directly processes Personal Data shall familiarize himself/herself with the requirements of the laws of the Russian Federation on processing and ensuring security of Personal Data, this Policy, and other local acts of the Company on processing and ensuring Personal Data security, and shall comply with them.