

# PERSONAL DATA PROCESSING POLICY

## 1. General Provisions

1.1. Personal Data Processing Policy (hereinafter referred to as the Policy) is aimed to protect the rights and freedoms of natural persons, whose personal data is processed by an individual entrepreneur, S.D. Belov (hereinafter referred to as the Operator).

1.2. This Policy has been developed in accordance with cl. 2 Part 1, Art. 18.1 of Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data" (hereinafter referred to as the FL "On Personal Data").

1.3. The Policy contains the data subject to disclosure in accordance with P. 1 of Art. 14 of FL "On Personal Data" and shall be a public document.

## 2. Information on personal data processing

2.1. The Operator shall process the personal data on the legal and equitable basis for performance of the functions, powers and obligations imposed by legislation, for exercise of rights and legitimate interests of the Operator, Operator's employees and third parties.

2.2. The Operator shall receive personal data directly from the subjects of personal data (hereinafter referred to as the PD).

2.3. The Operator shall process personal data by automated and manual methods, using the means of computer technology and without using such means.

2.4. Personal data processing operations include collection, recording, systematization, accumulation, storage, clarification (updating, change), retrieval, use, transfer (distribution, provision, access), anonymization, blocking, deletion and destruction.

## 3. Processing of Customers' personal data

3.1. The Operator shall process the customers' personal data within the legal relationships with the Operator governed by Part 2 of the Civil Code of the Russian Federation dated January 26, 1996 No. 14-FZ, (hereinafter referred to as the Customers').

3.2. The Operator shall process the customers' personal data in order to comply with the RF statutory regulations, as well as with the aim:

- to accept applications and requests from the subject of PD;
- to inform of the new goods, special promotional events and offers;
- to enter into and fulfill the contractual terms.

3.3. The Operator shall process the customers' personal data with their consent provided by the customers and/or their legal representatives by performing implicative actions on this website, including but not limited to ordering, user account registration, opt-in emails, in accordance with this Policy.

3.4. The Operator shall process the customers' personal data not longer than it is required by the purposes of personal data processing, unless otherwise required by the RF legislation.

3.5. The Operator may process the following customers' personal data:

- Surname, name, patronymic;
- Address;
- Contact phone number;

— E-mail address.

3.6. There is no processing of the special categories of personal data:

- 3.6.1. concerning race and ethnic background;
- 3.6.2. political opinions, religious or philosophic views;
- 3.6.3. health and intimate life.

#### 4. Information on personal data security

4.1. Upon personal data processing, the Operator shall take necessary legal, organizational and technical measures or shall ensure acceptance thereof to protect the personal data against unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions against personal data.

4.2. Upon processing personal data security measures, used by the Operator, shall be planned and implemented to ensure compliance with the requirements stated in Article 19 of FZ-152 "On Personal Data".

4.3. In accordance with Article 18.1 of FZ-152 the Operator shall individually specify the composition and list of measures necessary and sufficient to ensure compliance with the legal requirements. In particular, the Operator has taken the following measures:

- the person responsible for arranging the PD processing has been appointed;
- bylaws on the PD processing issues have been developed and implemented, as well as bylaws, which establish the procedures designed to prevent and detect violations of the established PD processing procedures, and to eliminate the consequences of such violations;
- legal, organizational and technical measures to ensure security of personal data are applied in accordance with article 19 of FZ-152;
- the internal control is exercised of the PD processing conformity with FZ-152 and regulatory legal acts adopted in this connection, requirements to the PD protection, the Operator's PD processing policy, Operator's local acts;
- damage is assessed, which may be caused to personal data subjects in case of breach of FZ-152, as well as the ratio of the caused damage and measures taken to ensure performance of duties specified by FZ-152;
- the Operator's employees, directly performing the PD processing, have read and understood the provisions of legislation of the Russian Federation on PD, including the requirements to the PD, documents specifying the Operator's PD processing policy, by laws on the PD processing issues;
- In addition to the requirements of 152-FZ "On Personal Data", the Operator shall perform a package of measures aimed at protection of the information about the customers, employees and counterparties.

#### 5. Rights of the personal data subjects

5.1. The personal data subject shall have the right to:

— obtain the personal data related to that subject and information concerning their processing;

- to update, block or destroy his/her personal data in the event that they are incomplete, obsolete, inaccurate, illegally obtained or not necessary for the stated processing purpose;
- to revoke his/her consent given to the personal data processing;
- to protect his/her rights and legitimate interests, including the right to compensation for damages and compensation for emotional damage in the courts;
- to appeal against the Operator's actions or inaction to the authorized body in charge of protection of the rights of the personal data subjects or through legal proceedings.

5.2. To exercise the rights and legitimate interests, the personal data subjects shall have the right to apply to the Operator or forward a request personally or through the representative. The request must contain the data stated in P. 3 of Art. 14 of FL "On Personal Data".