

PERSONAL DATA PROCESSING POLICY (CONFIDENTIALITY POLICY)

Legal Address: Russian Federation, 192286, St-Petersburg, Slavy pr., 29-114

Actual Address: Russian Federation, 192286, St-Petersburg, Moskovsky pr., 111-55

1. DOCUMENT PURPOSE AND SCOPE

- 1.1 Personal data processing policy (herein referred to as the Policy) for IP Mochalov A.A. (herein referred to as the Company) describes collection, storage, transfer and other types of personal data processing procedures, as well as information about the implemented requirements for personal data protection.
- 1.2 The Policy applies to all personal data of subjects processed in the Company with or without the use of automated equipment.
- 1.3 Any personal data subject is entitled to access to this Policy.
- 1.4 The Policy is developed in compliance with the current legislation of the Russian Federation.

2. PERSONAL DATA CONTENT

- 2.1 Personal data includes - any information directly or indirectly relating to an individual (citizen), i. e. name, year, month, date and place of birth, address, phone, e - mail, information about family or social status, property, education, profession, income and other information.
- 2.2 All personal data processed by the Company is confidential, strictly protected information in compliance with legislation.
- 2.3 Processing of personal data can be described as any action (operation) or a combination of actions (operations) with personal data performed with the use of automated processing equipment or without the use of such equipment. Such actions (operations) can include but are not limited to: collection, receipt, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

3. COMPANY PERSONAL DATA SUBJECTS

- 3.1 The Company processes personal data of the following individuals:
 - * individuals contributing to the Company under the civil law contracts;
 - * Company's clients;
 - * registered users of the Company website;
 - * Company website visitors.

4. PRINCIPLES AND CONDITIONS OF PERSONAL DATA PROCESSING

- 4.1 The purpose of processing personal data is to fulfill the obligations of the Operator to the Users regarding the use of the Website and its services.
- 4.2 The processing of the users' personal data is conducted with the consent of the personal data subjects.
- 4.3 Personal data refers to any information directly or indirectly related to an identified or identifiable individual (personal data subject) which can be used for the precise identification of a certain individual or to contact the aforementioned individual.
- 4.4 The Company may ask for your personal information at any time upon your contact with the Company. The Company can use such data in accordance with the current Policy. The Company can also combine such information with any other information with the purpose of providing and improving its products, services, content and communication.
- 4.5 The security of the Company's personal data comprises protection of the personal data from unauthorized or accidental access to it, destruction, change, blocking, copying, granting, distribution of personal data, as well as any other illegal actions in relation to personal data. The Company undertakes all the necessary legal, organizational and technical measures to protect personal data.
- 4.6 Processing and protection of the personal data in the Company is conducted in compliance with the requirements of the Constitution of the Russian Federation, Federal law No. 152-FZ "On personal data" as of 27 July 2006, bylaws, other Federal laws of the Russian Federation defining cases and specific features of processing personal data, guidelines and methodical documents provided by the FSTEC of Russia and the FSB of Russia.
- 4.7 The Company adheres to the following principles as to the personal data processing:
 - 4.8 legitimacy and fair basis;
 - 4.9 limitation of the personal data processing to the achievement of the specific, pre-defined and legitimate goals;
 - 4.10 prevention of the personal data processing incompatible with the purposes of personal data collection;
 - 4.11 prevention of the merging of databases containing personal data, which serve the purposes incompatible with each other;
 - 4.12 processing of personal data that meet the purposes stated above.

5. THE COMPANY PROCESSES PERSONAL DATA ONLY IF AT LEAST ONE OF THE FOLLOWING CONDITIONS IS MET:

- 5.1 processing of personal data is conducted with the consent of the personal data subject;
- 5.2 processing of personal data is necessary to achieve the purposes stipulated by law and for the implementation and execution of the functions, authority and duties conferred to the Operator by means of the Russian legislation;
- 5.3 processing of personal data is necessary for the execution of the contract, which the subject of personal data is the party of, either as the beneficiary or the warrant, as well

- as for the conclusion of the contract initiated by the personal data subject or the contract under which the personal data subject will be a beneficiary or a warrant;
- 5.4 the processing of personal data is necessary for either the exercise of rights and the legal interests of the Company or the third parties, or to achieve the socially significant purposes, provided that the rights and freedoms of the personal data subject are not violated;
- 5.5 unlimited access to and processing of the personal data is sanctioned by its subject or at his/her request;
- 5.6 personal data processed is subject to publication or mandatory disclosure in compliance with the Federal law.
- 5.7 the Company has the right to delegate personal data processing to the third parties based on the contracts concluded with those parties. Persons processing personal data on behalf of the Company pledge to comply with the principles and rules of processing and protection of personal data, provided by Federal law No. 152-FZ "On personal data" as of 27 July 2006. A list of actions (operations) with personal data conducted by a legal entity carrying out the personal data processing, the purposes of processing are defined for each person involved in personal data processing. Such person is also required to maintain confidentiality and provide the security of the personal data during processing.
- 5.8 List of legal entities the Company may entrust with the personal data processing based on cl.5.7. of the current Policy:

5.8.1. Limited Liability Company "CARROT QUEST", INN:5906128591, PPC: 590601001, OGRN: 1155958048223, Legal address: 614107, Perm, Turgeneva str. 35A-88, Moscow Branch of JSC CB "Module Bank", BIC: 044525092, KPP: 775043001.

- 5.9 In cases established by the legislation of the Russian Federation the Company has the right to transfer personal data of the citizens to the third parties.

6. RIGHTS OF THE PERSONAL DATA SUBJECT

- 6.1 The personal data subject has the right to:
- 6.1.1 require clarification on their personal data, its blocking or destruction in case the personal data is incomplete, outdated, false, illegally obtained or not necessary for the stated purpose of processing, as well as undertake legal actions in order to protect his/her rights;
- 6.1.2 request a list of the personal data processed by the operator and the source of its acquisition;
- 6.1.3 receive information about the time period required for his/her personal data processing, including information on the period of the personal data storage;
- 6.1.4 appeal to the authorized personal data protection agency or take legal action against unlawful acts or inaction in processing of his/her personal data.
- 6.1.5 receive information on the procedure of implementation of rights provided by Federal law "On personal data" No. 152-FZ as of 27 July 2017

7. LIABILITY

7.1 In case of the failure to comply with the provisions of the Policy the Company shall bear liability in compliance with the current legislation of the Russian Federation.

An individual can get all the information and clarifications regarding the processing of his/her personal data by contacting the Company in person or by sending an official inquiry by Russian Post to the following address: Russia, 196084, St. Petersburg, Moskovsky prospect 111, 55.

7.2 In case of sending an official request to the Company an individual must specify the following information in the text:

- * name (FIO);
- * passport number (or main identification document) of the personal data subject or his/her representative, date of issue and the issuing authority;
- * information confirming the individual's involvement with the Company or any other confirmation of the fact of the individual's personal data being processed by the Company;
- * individual's signature (or the signature of his/her legal representative). If the request is being sent electronically, it must be issued in the form of the electronic document and signed by electronic signature in compliance with the legislation of the Russian Federation.

8. FINAL PROVISIONS

8.1 The current Policy is subject to change in case of the new legislative acts and special regulatory documents on personal data processing and protection being introduced.

8.2 The current Policy is an internal document of the Company and is subject to being displayed on the Company official website.

8.3 The implementation of the requirements of this Policy is supervised by the person responsible for the security of the Company's personal data.