## **Personal Data Processing Policy**

Moscow July 27, 2016

### **Terms and Definitions**

**Automated processing of personal data** – processing of personal data using computing equipment. **Blocking of personal data** – temporary cessation of personal data processing (except in cases where processing is necessary to clarify personal data).

**Personal data information system** – an information system that consists of personal data contained in databases, as well as information technologies and technical means that allow the processing of such personal data with or without the use of automation tools.

**Depersonalization of personal data** – actions resulting in the inability to determine the ownership of personal data to a specific User or other subject of personal data without the use of additional information.

**Processing of personal data** – any action (operation) or set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, usage, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

**Personal data** – any information relating directly or indirectly to a specific or identifiable User of the website:<https://mallmir.com/> (hereinafter referred to as the Site).

**Personal data permitted by the subject of personal data for dissemination** – personal data, access to which is provided by the subject of personal data to an unlimited number of persons by giving consent to the processing of personal data permitted by the subject of personal data for dissemination in the manner prescribed by the Personal Data Law (hereinafter referred to as personal data permitted for dissemination).

**User** – any visitor to the Site, belonging to the following categories: individual, including as an individual entrepreneur, representative of a legal entity.

**Provision of personal data** – actions aimed at disclosing personal data to a specific person or a specific circle of persons

. **Distribution of personal data** – any actions aimed at disclosing personal data to an unlimited circle of persons (transfer of personal data) or at familiarizing an unlimited circle of persons with personal data, including public disclosure of personal data in the media, placement in information and telecommunication networks or providing access to personal data in any other way.

**Destruction of personal data** – any actions resulting in the irreversible destruction of personal data with the impossibility of further restoration of personal data content in the personal data information system and (or) the destruction of personal data carriers.

### **1. General Provisions**

1.1. The Personal Data Processing Policy (hereinafter referred to as the Policy) is drawn up in accordance with the Constitution of the Russian Federation, the Civil Code of the Russian Federation, the Federal Law "On Information, Information Technologies and Information Protection," the Federal Law dated 27.07.2006 No. 152-FZ "On Personal Data" (hereinafter referred to as the Personal Data Law) and applies to all information that the Limited Liability Company "BEKR," represented by General Director Mahmudi Said Rasul, acting on the basis of the Charter, legal address: 117525, City of Moscow, internal territory of the Municipal District of Chertanovo Northern, Chertanovskaya Street, building 18, room 1/1, can obtain about the user during their use of the Site and during the execution of the purchase-sale/supply contract.

1.2. Use of the Site signifies the user's consent to the Policy. If the user disagrees with these terms, they must refrain from using the Site.

1.3. The Operator has the right to make changes to the Policy without the user's consent. The new version of the Policy comes into force from the moment it is posted on the Site unless otherwise provided by the new version of the Policy. The current version of the Policy is freely available on the Site.

1.4. The purpose of developing the Policy is to determine the procedure for processing personal data of the Site Users and other subjects of personal data whose personal data is subject to processing, based on the Operator's authority; to ensure the protection of human and civil rights and freedoms, including the buyer's rights, when processing their personal data, including the right to privacy, personal and family secrets, as well as to establish the responsibility of officials with access to personal data for non-compliance with the regulations governing the processing and protection of personal data.

1.5. The confidentiality regime of personal data is lifted in cases of their depersonalization and after 75 years of storage, or it is extended based on the conclusion of the Operator's expert commission, unless otherwise provided by law.

### **2. Rights and Obligations of the Operator**

2.1. The Operator has the right to:

2.1.1. receive reliable information and/or documents containing personal data from the subject of personal data;

2.1.2. in the event of the subject of personal data withdrawing consent to the processing of personal data, the Operator has the right to continue processing personal data without the consent of the subject of personal data if there are grounds specified in the Personal Data Law;

2.1.3. independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations provided by the Personal Data Law and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws.

2.2. The Operator is obliged to:

2.2.1. provide the subject of personal data, upon their request, with information concerning the processing of their personal data;

2.2.2. organize the processing of personal data in the manner established by the current legislation of the Russian Federation;

2.2.3. respond to inquiries and requests from subjects of personal data and their legal representatives in accordance with the requirements of the Personal Data Law;

2.2.4. notify the authorized body for the protection of the rights of subjects of personal data upon request of this body with the necessary information within 30 days from the date of receipt of such a request;

2.2.5. publish or otherwise provide unrestricted access to this Policy regarding the processing of personal data

2.2.6. take legal, organizational, and technical measures to protect personal data from unlawful or accidental access, destruction, alteration, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions regarding personal data;

2.2.7. cease the transfer (distribution, provision, access) of personal data, cease processing and destroy personal data in the manner and cases provided by the Personal Data Law;

2.2.8. fulfill other obligations provided by the Personal Data Law.

### **3. Main Rights and Obligations of Personal Data Subjects**

3.1. A personal data subject has the right to:

3.1.1. obtain information regarding the processing of their personal data, except in cases provided by federal laws of the Russian Federation. Information is provided to the personal data subject by the Operator in an accessible form and should not contain personal data relating to other personal data subjects, except when there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Personal Data Law;

3.1.2. demand that the operator clarify, block, or destroy their personal data if the personal data is incomplete, outdated, inaccurate, obtained unlawfully, or is not necessary for the stated purpose of processing, and also to take measures provided by law to protect their rights;

3.1.3. stipulate a prior consent condition when processing personal data for the purpose of promoting goods, works, and services in the market;

3.1.4. withdraw consent to the processing of personal data;

3.1.5. appeal to the authorized body for the protection of the rights of personal data subjects or to a court against unlawful actions or inaction of the Operator when processing their personal data;

3.1.6. exercise other rights provided by the legislation of the Russian Federation.

3.2. A personal data subject is obliged to:

3.2.1. provide the Operator with reliable data about themselves;

3.2.2. inform the Operator about clarifying (updating, changing) their personal data.

3.2.3. Persons who provide the Operator with false information about themselves or information about another personal data subject without the latter's consent are liable in accordance with the legislation of the Russian Federation.

### **4. The Operator May Process the Following User Personal Data**

4.1. Surname, name, patronymic;

4.2. Phone number; 4.3. Contact information (e-mail);

4.4. Banking details when paying for services; 4.5. Delivery address for goods;

4.6. The Site collects and processes anonymized data about visitors (including cookies) using internet statistics services (Yandex Metrica, Google Analytics, and others).

4.7. The above data is hereinafter collectively referred to as Personal Data in the Policy.

4.8. The Operator does not process special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, intimate life.

4.9. Processing of personal data permitted for dissemination from special categories of personal data specified in part 1 of Article 10 of the Personal Data Law is allowed if prohibitions and conditions provided by Article 10.1 of the Personal Data Law are observed.

4.10. User consent to the processing of personal data permitted for dissemination is given separately from other consents to the processing of their personal data. In doing so, the conditions provided, in particular, by Article 10.1 of the Personal Data Law are observed. The requirements for the content of such consent are established by the authorized body for the protection of the rights of personal data subjects.

4.10.1. Consent to the processing of personal data permitted for dissemination is provided by the User directly to the Operator.

4.10.2. The Operator is obliged, no later than three working days from the receipt of such consent from the User, to publish information about the conditions of processing, the presence of prohibitions, and conditions for processing personal data permitted for dissemination by an unlimited number of persons.

4.10.3. The transfer (distribution, provision, access) of personal data permitted by the personal data subject for dissemination must be stopped at any time upon request from the personal data subject. This request must include the surname, name, patronymic (if available), contact information (phone number, email address, or postal address) of the personal data subject, and a list of personal data whose processing is to be terminated.

4.10.4. Consent to the processing of personal data permitted for dissemination ceases to be valid from the moment the Operator receives the request specified in clause 4.10.3 of this Policy regarding the processing of personal data.

### **5. Principles of Personal Data Processing**

5.1. Personal data processing is carried out on a legal and fair basis.

5.2. Personal data processing is limited to achieving specific, pre-determined, and legitimate purposes. Processing of personal data incompatible with the purposes of collecting personal data is not allowed.

5.3. The merging of databases containing personal data, the processing of which is carried out for purposes incompatible with each other, is not allowed.

5.4. Only personal data that meet the purposes of their processing are subject to processing.

5.5. The content and volume of processed personal data correspond to the stated purposes of processing. The processed personal data must not be excessive in relation to the stated purposes of their processing.

5.6. Accuracy of personal data, their sufficiency, and, where necessary, relevance to the purposes of personal data processing must be ensured during the processing of personal data. The Operator takes the necessary measures and/or ensures that they are taken to remove or clarify incomplete or inaccurate data.

5.7. Personal data is stored in a form that allows identifying the personal data subject no longer than required by the purposes of personal data processing, unless the storage period for personal data is established by federal law, a contract to which the personal data subject is a party, beneficiary, or guarantor. Processed personal data is destroyed or depersonalized upon achieving the purposes of processing or in case of loss of necessity in achieving these purposes, unless otherwise provided by federal law.

### **6. Purposes of Personal Data Processing**

6.1. The purpose of processing User personal data is:

* informing the User by sending emails;
* conclusion, execution, and termination of civil law contracts;
* providing the User with access to the services, information, and/or materials contained on the Site;
* clarifying order details.

6.2. The Operator also has the right to send the User notifications about new products and services, special offers, and various events. The User can always opt out of receiving informational messages by sending an email to the Operator's address:<https://mallmir.com/> (hereinafter referred to as the Operator's Email Address) with the subject "Opt-out of notifications about new products and services and special offers."

6.3. Anonymized data of Users collected using internet statistics services are used to collect information about Users' actions on the site, to improve the quality of the site and its content.

### **7. Legal Grounds for Processing Personal Data**

7.1. The Operator processes the User's personal data only if they are filled in and/or sent by the User independently through special forms located on the Site or sent to the Operator via email. By filling out the relevant forms and/or sending their personal data to the Operator, the User expresses their consent to this Policy.

7.2. The Operator processes anonymized data about the User if it is allowed in the User's browser settings (enabled saving of "cookies" and use of JavaScript technology).

7.3. The personal data subject independently decides to provide their personal data and gives consent freely, by their own will, and in their interest.

7.4. The Operator processes personal data based on Article 772 of the Civil Code of the Russian Federation.

### **8. Conditions for Processing Personal Data**

8.1. Personal data processing is carried out with the consent of the personal data subject to the processing of their personal data.

8.2. Personal data processing is necessary to achieve the goals stipulated by an international treaty of the Russian Federation or by law, for the performance of functions, powers, and duties imposed on the operator by the legislation of the Russian Federation.

8.3. Personal data processing is necessary for the administration of justice, the execution of a judicial act, an act of another body or official, subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings.

8.4. Personal data processing is necessary for the execution of a contract to which the personal data subject is a party, beneficiary, or guarantor, as well as for the conclusion of a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor.

8.5. Personal data processing is necessary to exercise the rights and legitimate interests of the operator or third parties or to achieve socially significant goals, provided that this does not violate the rights and freedoms of the personal data subject.

8.6. Publicly available personal data are processed, which are made available by the personal data subject or at their request to an unlimited number of persons.

8.7. Personal data subject to publication or mandatory disclosure in accordance with federal law are processed.

### **9. Procedure for Collection, Storage, Transfer, and Other Types of Personal Data Processing**

9.1. The security of personal data processed by the Operator is ensured through the implementation of legal, organizational, and technical measures necessary to fully comply with the requirements of the current legislation of the Russian Federation in the field of personal data protection.

9.2. The Operator ensures the safety of personal data and takes all possible measures to exclude access to personal data by unauthorized persons.

9.3. The User's personal data will never be transferred to third parties under any circumstances, except for cases related to the execution of applicable law or if the personal data subject has given consent to the Operator to transfer data to a third party to fulfill obligations under a civil law contract.

9.4. If inaccuracies are found in personal data, the User can update them independently by sending a notification to the Operator's email address marked "Updating personal data."

9.5. The period for processing personal data is determined by achieving the purposes for which the personal data were collected unless a different period is provided by the contract or applicable legislation of the Russian Federation. The User can withdraw their consent to the processing of personal data at any time by sending a notification to the Operator via email to the Operator's email address marked "Withdrawal of consent to the processing of personal data."

9.6. All information collected by third-party services, including payment systems, communication tools, and other service providers, is stored and processed by these parties (Operators) in accordance with their User Agreement and Privacy Policy. The personal data subject and/or User must independently timely familiarize themselves with these documents. The Operator is not responsible for the actions of third parties, including the service providers mentioned in this clause.

9.7. The prohibitions set by the personal data subject on the transfer (except for providing access), as well as on the processing or conditions of processing (except for access) of personal data permitted for dissemination, do not apply in cases of processing personal data in the state, public, and other public interests as defined by the legislation of the Russian Federation.

9.8. The Operator ensures the confidentiality of personal data during its processing.

9.9. The Operator stores personal data in a form that allows identifying the personal data subject no longer than required by the purposes of personal data processing unless the period for storing personal data is established by federal law, a contract to which the personal data subject is a party, beneficiary, or guarantor.

9.10. The condition for terminating the processing of personal data can be achieving the purposes of personal data processing, the expiration of the consent period of the personal data subject, the withdrawal of consent by the personal data subject, as well as the detection of unlawful processing of personal data.

### **10. List of Actions Performed by the Operator with Received Personal Data**

10.1. The Operator collects, records, systematizes, accumulates, stores, updates (modifies, changes), retrieves, uses, transfers (distributes, provides, accesses), anonymizes, blocks, deletes, and destroys personal data.

10.2. The Operator performs automated processing of personal data with obtaining and/or transferring the received information via information and telecommunication networks or without such networks.

10.3. Upon achieving the purpose of personal data processing, the Operator destroys personal data by deleting them without the possibility of recovery; personal data stored on a hard drive is deleted using operating system tools with subsequent cleaning of the recycle bin.

### **11. Confidentiality of Personal Data**

11.1. The Operator and other persons who have gained access to personal data must not disclose to third parties and not distribute personal data without the consent of the personal data subject unless otherwise provided by federal law.

### **12. Feedback. Questions and Suggestions**

12.1. All suggestions or questions regarding this Policy should be sent to the Operator's email address.