

Personal Data Processing Policy

1. General Provisions

This Personal Data Processing Policy has been prepared in accordance with the requirements of Federal Law No. 152-FZ "On Personal Data" dated 27 July 2006 (hereinafter referred to as the Personal Data Law) and defines the procedure for processing personal data and the measures to ensure the security of personal data taken by LLC "TRADING COMPANY KOBLIK" (hereinafter referred to as the Operator).

1.1. The Operator considers the observance of the rights and freedoms of man and citizen in the processing of his personal data, including the protection of the rights to inviolability of private life, personal and family secrets, as its most important goal and condition for carrying out its activities.

1.2. This Operator's Policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator may obtain about visitors to the website <https://koblik.com>.

2. Basic Concepts Used in the Policy

2.1. Automated processing of personal data — processing of personal data using computer technology.

2.2. Blocking of personal data — temporary cessation of the processing of personal data (except in cases where processing is necessary to clarify personal data).

2.3. Website — a set of graphic and informational materials, as well as computer programs and databases that ensure their availability on the Internet at the network address <https://koblik.com>.

2.4. Personal data information system — a set of personal data contained in databases and the information technologies and technical means that ensure their processing.

2.5. Depersonalization of personal data — actions as a result of which it is impossible to determine, without the use of additional information, the belonging of personal data to a specific User or other personal data subject.

2.6. 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, changing), extraction, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion, and destruction of personal data.

2.7. Operator — a state body, municipal body, legal entity or natural person that independently or jointly with other persons organizes and (or) carries out the processing of personal data, and also determines the purposes of processing personal data, the composition of personal data subject to processing, and the actions (operations) performed with personal data.

2.8. Personal data — any information relating directly or indirectly to a specific or identifiable User of the website <https://koblik.com>.

2.9. Personal data permitted by the personal data subject for dissemination — personal data access to which by an unlimited circle of persons is provided by the personal data subject by giving consent to the processing of personal data permitted by the personal data subject for dissemination in the manner prescribed by the Personal Data Law (hereinafter — personal data permitted for dissemination).

2.10. User — any visitor to the website <https://koblik.com>.

2.11. Provision of personal data — actions aimed at disclosing personal data to a certain person or a certain circle of persons.

2.12. Dissemination of personal data — any actions aimed at disclosing personal data to an indefinite circle of

persons (transfer of personal data) or at making personal data known to an unlimited circle of persons, including the publication of personal data in the mass media, placement in information and telecommunication networks, or provision of access to personal data in any other way.

2.13. Cross-border transfer of personal data — transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual, or a foreign legal entity.

2.14. Destruction of personal data — any actions as a result of which personal data are destroyed irrevocably with the impossibility of further restoration of the content of personal data in the personal data information system and (or) the material carriers of personal data are destroyed.

3. Basic Rights and Obligations of the Operator

3.1. The Operator has the right:

- to receive from the personal data subject reliable information and/or documents containing personal data;
- in the event of withdrawal by the personal data subject of consent to the processing of personal data, the Operator has the right to continue processing personal data without the consent of the personal data subject if there are grounds specified in the Personal Data Law;
- independently to determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations provided for by the Personal Data Law and the regulatory legal acts adopted in accordance therewith, unless otherwise provided by the Personal Data Law or other federal laws.

3.2. The Operator is obliged:

- to provide the personal data subject, upon his request, with information concerning the processing of his personal data;
- to organize the processing of personal data in the manner established by the current legislation of the Russian Federation;
- to respond to appeals and requests of personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
- to report to the authorized body for the protection of the rights of personal data subjects, at the request of this body, the necessary information within 30 days from the date of receipt of such a request;
- to publish or otherwise ensure unrestricted access to this Policy regarding the processing of personal data;
- to take legal, organizational and technical measures to protect personal data from unauthorized or accidental access thereto, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unlawful actions in relation to personal data;
- to cease the transfer (dissemination, provision, access) of personal data, cease processing and destroy personal data in the manner and cases provided for by the Personal Data Law;
- to fulfill other obligations provided for by the Personal Data Law.

4. Basic Rights and Obligations of Personal Data Subjects

4.1. Personal data subjects have the right:

- to receive information concerning the processing of his personal data, except in cases provided for by federal laws. The information is provided to the personal data subject by the Operator in an accessible form, and it shall not contain personal data relating to other personal data subjects, except in cases where 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;
- to require the operator to clarify his personal data, block or destroy them if the personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, as well as to take the measures provided by law to protect their rights;
- to put forward the condition of prior consent when processing personal data for the purpose of promoting goods, works and services on the market;
- to withdraw consent to the processing of personal data;
- to appeal to the authorized body for the protection of the rights of personal data subjects or in court against

unlawful actions or inaction of the Operator in the processing of his personal data;
– to exercise other rights provided for by the legislation of the Russian Federation.

4.2. Personal data subjects are obliged:

– to provide the Operator with reliable data about themselves;
– to inform the Operator of the clarification (update, change) of their personal data.

4.3. Persons who have provided the Operator with unreliable information about themselves, or information about another personal data subject without the latter's consent, shall bear liability in accordance with the legislation of the Russian Federation.

5. The Operator May Process the Following Personal Data of the User

5.1. Last name, first name, patronymic.

5.2. Electronic address (mail and other means).

5.3. Telephone numbers.

5.4. The website also collects and processes depersonalized data about visitors (including "cookie" files) using Internet statistics services (Yandex Metrika, Google Analytics, and others).

5.5. The above-listed data are hereinafter in the text of the Policy united by the general concept of Personal Data.

5.6. Processing of special categories of personal data relating to racial or national origin, political views, religious or philosophical beliefs, or intimate life is not carried out by the Operator.

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

5.8. The User's consent to the processing of personal data permitted for dissemination is executed separately from other consents to the processing of his personal data. In this case, the conditions provided for, 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.

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

5.8.2. The Operator is obliged, no later than three working days from the moment of receipt of the specified consent of the User, to publish information on the conditions of processing and on the existence of prohibitions and conditions for processing by an unlimited circle of persons of personal data permitted for dissemination.

5.8.3. The transfer (dissemination, provision, access) of personal data permitted by the personal data subject for dissemination must be terminated at any time at the request of the personal data subject. This requirement must include the last name, first name, patronymic (if any), contact information (telephone number, email address or postal address) of the personal data subject, as well as a list of personal data the processing of which is subject to termination. The personal data specified in this requirement may be processed only by the Operator to whom it is addressed.

5.8.4. Consent to the processing of personal data permitted for dissemination ceases to be valid from the moment the Operator receives the requirement specified in clause 5.8.3 of this Policy regarding the processing of personal data.

6. Principles of Personal Data Processing

6.1. Processing of personal data is carried out on a lawful and fair basis.

6.2. Processing of personal data is limited to the achievement of specific, predetermined and lawful purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not permitted.

6.3. Combining databases containing personal data the processing of which is carried out for purposes that are incompatible with each other is not permitted.

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

6.5. The content and volume of processed personal data correspond to the stated purposes of processing. Excessiveness of processed personal data in relation to the stated purposes of their processing is not permitted.

6.6. When processing personal data, the accuracy of personal data, their sufficiency, and, where necessary, their relevance in relation to the purposes of processing personal data are ensured. The Operator takes the necessary measures and/or ensures that they are taken to delete or clarify incomplete or inaccurate data.

6.7. Storage of personal data is carried out in a form that allows identification of the personal data subject for no longer than is required by the purposes of processing personal data, unless the storage period of personal data is established by federal law, a contract to which the personal data subject is a party, beneficiary or surety. Processed personal data are destroyed or depersonalized upon achievement of the processing purposes or in the event of loss of the need to achieve these purposes, unless otherwise provided by federal law.

7. Purposes of Personal Data Processing

7.1. The purpose of processing the User's personal data:

- informing the User by sending electronic letters;
- conclusion, performance and termination of civil-law contracts.

7.2. The Operator also has the right to send the User notifications about new products and services, special offers and various events. The User may at any time refuse to receive informational messages by sending the Operator a letter to the email address sales@koblik.com with the note "Refusal of notifications about new products and services and special offers".

7.3. Depersonalized data of Users collected using Internet statistics services serve to collect information about the actions of Users on the site, to improve the quality of the site and its content.

8. Legal Grounds for Processing Personal Data

8.1. The legal grounds for the processing of personal data by the Operator are:

- the Operator's statutory (constituent) documents;
- federal laws and other regulatory legal acts in the field of personal data protection;
- Users' consents to the processing of their personal data and to the processing of personal data permitted for dissemination.

8.2. 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 website <https://koblik.com> or sent to the Operator by email. By filling in the relevant forms and/or sending their personal data to the Operator, the User expresses his consent to this Policy.

8.3. The Operator processes depersonalized data about the User if this is permitted in the User's browser settings (saving of "cookie" files and use of JavaScript technology are enabled).

8.4. The personal data subject independently decides on the provision of his personal data and gives consent freely, of his own will and in his own interest.

9. Conditions for Processing Personal Data

9.1. Processing of personal data is carried out with the consent of the personal data subject to the processing of his personal data.

9.2. Processing of personal data is necessary to achieve the purposes provided for by an international treaty of the Russian Federation or by law, for the performance of the functions, powers and duties assigned by the legislation of the Russian Federation to the operator.

9.3. Processing of personal data is necessary for the administration of justice, execution of a judicial act, act of another body or official that is subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings.

9.4. Processing of personal data is necessary for the performance of a contract to which the personal data subject is a party or beneficiary or surety, 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 surety.

9.5. Processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator or third parties or for the achievement of socially significant goals, provided that the rights and freedoms of the

personal data subject are not violated.

9.6. Processing of personal data is carried out, access of an unlimited circle of persons to which is provided by the personal data subject or at his request (hereinafter — publicly available personal data).

9.7. Processing of personal data subject to publication or mandatory disclosure in accordance with federal law is carried out.

10. Procedure for Collection, Storage, Transfer and Other Types of Processing of Personal Data

The security of personal data processed by the Operator is ensured by implementing the legal, organizational and technical measures necessary for full compliance with the requirements of the current legislation in the field of personal data protection.

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

10.2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of current legislation or if the personal data subject has given the Operator consent to transfer the data to a third party for the performance of obligations under a civil-law contract.

10.3. In the event of inaccuracies in personal data being identified, the User may update them independently by sending the Operator a notification to the Operator's email address sales@koblik.com with the note "Updating of personal data".

10.4. The period of processing of personal data is determined by the achievement of the purposes for which the personal data were collected, unless another period is provided for by the contract or current legislation. The User may at any time withdraw his consent to the processing of personal data by sending the Operator a notification by email to the Operator's email address sales@koblik.com with the note "Withdrawal of consent to the processing of personal data".

10.5. All information that is collected by third-party services, including payment systems, means of communication and other service providers, is stored and processed by the specified persons (Operators) in accordance with their User Agreement and Privacy Policy. The personal data subject and/or User is obliged independently and in a timely manner to familiarize himself with the specified documents. The Operator bears no responsibility for the actions of third parties, including the service providers specified in this paragraph.

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

10.7. The Operator, when processing personal data, ensures the confidentiality of personal data.

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

10.9. The condition for terminating the processing of personal data may be the achievement of the purposes of processing personal data, the expiration of the term of validity of the consent of the personal data subject or the withdrawal of consent by the personal data subject, as well as the identification of unlawful processing of personal data.

11. List of Actions Performed by the Operator with the Received Personal Data

11.1. The Operator carries out collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion and destruction of personal data.

11.2. The Operator carries out automated processing of personal data, including receipt and/or transfer of the received information via information and telecommunication networks if required.

12. Cross-Border Transfer of Personal Data

12.1. The Operator, prior to commencing the cross-border transfer of personal data, is obliged to ensure that the foreign state to whose territory it is intended to carry out the transfer of personal data provides reliable protection of the rights of personal data subjects.

12.2. Cross-border transfer of personal data to the territories of foreign states that do not meet the above requirements may be carried out only if there is written consent of the personal data subject to the cross-border transfer of his personal data and/or performance of a contract to which the personal data subject is a party.

13. Confidentiality of Personal Data

The Operator and other persons who have obtained access to personal data are obliged not to disclose to third parties and not to disseminate personal data without the consent of the personal data subject, unless otherwise provided by federal law.

14. Final Provisions

14.1. The User may obtain any clarifications on issues of interest concerning the processing of his personal data by contacting the Operator by email at sales@koblik.com.

14.2. Any changes to the personal data processing policy by the Operator will be reflected in this document. The Policy is valid indefinitely until it is replaced by a new version.

14.3. The current version of the Policy is freely available on the Internet at <https://koblik.ru/polzovatelskoe-soglashenie/>.