

PERSONAL DATA PROCESSING POLICY

General provisions

This document (hereinafter referred to as the Policy) defines the policy regarding the processing of personal data of Friflex Limited Liability Company (hereinafter referred to as the Operator).

The Policy was developed in compliance with the requirements of paragraph 2, Part 1 of Article 18.1 of Federal Law No. 152 of 27.07.2006 "On Personal Data" (hereinafter referred to as the Law on Personal Data) and defines the procedure for collecting, storing, transferring and other types of processing of personal data, as well as information on the implemented requirements for personal data protection.

The concepts contained in Article 3 of the Law on Personal Data are used in this Policy with a similar meaning.

Composition of personal data

Information constituting personal data is any information relating to a directly or indirectly identified or identifiable natural person (subject of personal data).

All personal data processed by the Operator are confidential, strictly protected information in accordance with the law.

Purposes of personal data processing

Personal data is processed by the Operator for the purpose of organizing and conducting by the Operator (including with the involvement of third parties) events, loyalty programs, marketing and/or promotions, research, surveys; fulfillment by the Operator of obligations under the service agreement; provision of other services to personal data subjects; promotion of the services and /or goods of the Operator and / or the Operator's partners in the market by making direct contacts with the Operator's customers using various means of communication, including, but not limited to, by telephone, e-mail, mailing, on the Internet, etc.; for other purposes, if the Operator's actions do not contradict the current legislation.

The Operator, in order to properly perform its duties as an Operator, processes the following personal data:

- surname, name, patronymic of the subject of personal data;
- place of residence (region/city);
- company/educational institution;
- job title;
- specialty/area of professional interests;
- cell phone number;
- email address (email);
- social media profiles;
- history of requests and views on the Operator's websites and its services (for website visitors and users of mobile applications);
- other information (the above list may be reduced or expanded depending on the specific case and the purposes of processing).

The procedure for collecting, storing, transferring and other types of processing of personal data

The processing of personal data is carried out by the Operator subject to obtaining the consent of the subject of personal data (hereinafter referred to as the Consent), except for the cases established by the legislation of the Russian Federation when the processing of personal data can be carried out without such Consent.

The subject of personal data decides to provide their personal data and gives Consent freely, of their own free will and in their own interest.

Consent is given in any form that allows you to confirm the fact of its receipt.

When processing personal data, the Operator takes or ensures that the necessary legal, organizational and technical measures are taken to protect personal data from unauthorized or accidental access to

them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data.

The Operator, in order to achieve the purposes of processing, has the right to transfer personal data to third parties – partners of the Operator on the basis of relevant agreements and with the consent of the subjects of personal data.

Rights and liabilities of the Operator of personal data

The operator of personal data has the right to:

- defend their interests in court;
- provide personal data of the subjects to third parties, if this is provided for by the agreement with the subject and the current legislation (tax, law enforcement agencies, etc.);
- refuse to provide personal data in cases provided for by law;
- use the personal data of the subject without their consent in cases provided for by law.

The operator of personal data is obliged to:

- process personal data in the manner prescribed by the current legislation of the Russian Federation;
- consider the appeals of the subject of personal data (their legal representative) on the processing of personal data and give reasoned answers;
- provide the subject of personal data (their legal representative) with the opportunity of free access to their personal data;
- take measures to clarify, destroy the personal data of the subject of personal data in connection with their (their legal representative) handling legal and reasonable requirements;
- organize the protection of personal data in accordance with the requirements of the legislation of the Russian Federation.

Rights and liabilities of the subject of personal data

The subject of personal data has the right to:

- demand clarification of their personal data, their blocking or destruction if personal data is incomplete, outdated, unreliable, illegally obtained or not necessary for the stated purpose of processing, as well as take legal measures to protect their rights;
- require a list of their personal data processed by the Operator and the source of their receipt;
- receive information about the terms of processing of their personal data, including the terms of their storage;
- demand notification of all persons who were previously informed of their incorrect or incomplete personal data of all exceptions, corrections or additions made to them;
- appeal to the authorized body for the protection of the rights of subjects of personal data or in court against unlawful actions or omissions in the processing of their personal data;
- protect their rights and legitimate interests, including compensation for losses and (or) compensation for moral damage in court.

Cookie policy

Cookies are used on the Operator's websites to improve the quality of visitors' (users') interaction with these websites, allowing the latter to "remember" visitors (users) during their first or during repeated visits. In some cases, cookies are used to personalize information on websites based on the location of visitors and/or their preferences when visiting websites.

The Operator uses cookies that are necessary to move visitors (users) around the site or to operate certain basic functions. Cookies are used to improve the functionality of the website, for example by saving the visitor's (user's) settings. The Operator also uses cookies to improve the performance of its websites, in order to improve the quality of the interaction of visitors (users) with them.

The Operator does not use cookies to collect information that allows visitors (users) to be identified.

When visiting the Operator's websites, the following cookies may be used:

- own cookies are set by the visited site and can only be read by this website;
- third-party cookies are set by other organizations whose services are used by the Operator. For example, the Operator uses third-party analytics services, and the providers of these services set cookies on behalf of the Operator to tell the Operator which sections of the Operator's websites are

popular and which are not. The Operator's websites may contain materials downloaded from, for example, YouTube, and such third-party websites may set their own cookies.

If a visitor does not want to receive cookies, they can configure their browser to receive notifications every time they try to send cookies or reject all cookies. Existing cookies can also be deleted.

If a visitor wants to restrict or block cookies placed on their device, they can do this using the browser settings according to the instructions of the Help of this browser. Instructions on how to do this in the browser of a mobile device should be given in the manual of this device.

The Operator's websites and applications may contain links to other websites and services that are beyond the Operator's control and beyond the jurisdiction of this policy. Operators of these sites and services may collect information about visitors and use it in accordance with their policy, which may differ from the policy of the Operator.

Final provisions

This Policy is subject to change, addition in the event of new legislative acts and special regulatory documents on the processing and protection of personal data.

The Operator reserves the right to change and/or update the Policy at any time. The new version of the Policy comes into force from the moment it is posted on the Operator's website or mobile application, unless otherwise provided by the new version of the Policy.

Control over the fulfillment of the requirements of this Policy is carried out by the person responsible for ensuring the security of the Operator's personal data.

Details of Friflex LLC:

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