

# Personal Data Processing Policy

## 1. General Terms

1.1. The Policy on the processing of personal data (hereinafter the Policy) is aimed at protecting the rights and freedoms of individuals, whose personal data are processed by ZSL "Soyuz", LLC, hereinafter the Operator.

1.2. The policy was developed in accordance with the Constitution of the Russian Federation, the Federal Law "On Information, Information Technologies and Information Protection" No. 149-FZ dated July 27, 2006, the Federal Law "On Personal Data" No. 152-FZ dated July 27, 2006 and other laws and regulations.

1.3. The policy contains information to be disclosed in accordance with Part 1 of Art. 14 of the Federal Law "On Personal Data", and is a public document.

## 2. Information about the Operator

2.1. The Operator operates at the address: Izhevsk, ul. Votkinskoe Shosse, 33a, tel .: +7 (3412) 450-892, INN 1840080677, KPP 184001001, OGRN 1181832014319, email address for questions related to the Service support, its efficiency: info@soyuz.pro.

## 3. Information on the processing of personal data

3.1. By providing his own personal data, the client agrees to its processing (up to the client's withdrawal of his consent to the processing of his personal data) by the Operator for the purpose of fulfilling by the Operator and / or its partners of their obligations to the client, providing services, providing reference information, as well as promoting services, and also agrees to receive promotional messages and service notifications. In processing the client's personal data, the Operator is guided by the Federal Law "On Personal Data", the Federal Law "On Advertising" and local norms and regulations.

3.2. The Operator receives personal data directly from the subjects of personal data.

3.3. The Operator processes personal data in automated and non-automated ways, using computer technology and without the use of such tools.

3.4. Actions for the processing of personal data include the collection, recording, systematization, accumulation, storage, refinement (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion and destruction.

## 4. Processing of customer's personal data

4.1. The Operator processes the personal data of clients within the framework of legal relations with the Operator, settled by part two of the Civil Code of the Russian Federation dated January 26, 1996 No. 14-FZ, (hereinafter referred to as clients).

4.2. The Operator processes the personal data of clients in order to comply with the laws of the Russian Federation, as well as for:

- evaluation and analysis of the Site;
- providing personal recommendations;
- providing services to clients in case when it requires obtaining personal customer data;
- marketing and promotion;
- providing notification or marketing information, including information about new services, ongoing promotions, events, providing information about new services through telephone calls;
- handling customer complaints / requests;
- the conclusion and execution of the terms of the contract.

4.3. The Operator processes the personal data of clients with their consent which is provided by clients and / or their legal representatives by performing concealed actions on this Internet site, including, but not limited to, placing an order, registering in a personal account, subscribing to the newsletter, in accordance with this Policy.

4.4. The Operator processes the personal data of customers no longer than it is required by the purposes of processing personal data, unless otherwise provided by the requirements of the legislation of the Russian Federation.

4.5. The Operator processes the following personal customer data:

- customer's name;
- customer's contact phone number;
- customer's email address.

## 5. Information about the security of personal data

5.1. The Operator appoints a person responsible for organizing the processing of personal data to fulfill the obligations stipulated by the Federal Law "On Personal Data" and corresponding laws and regulations.

5.2. The Operator applies a set of legal, organizational and technical measures to ensure the security of personal data to ensure the confidentiality of personal data and their protection from illegal actions:

- provides unrestricted access to the Policy, a copy of which is located at the location address of the Operator, and can also be posted on the Operator's website (if available);
- in pursuance of the Policy, approves and enforces the document "Regulations on the processing of personal data" (hereinafter - the Regulations) and other local acts;
- introduce to employees the provisions of the legislation on personal data, as well as the Policy and Regulations;
- carries out the admission of employees to personal data which is processed in the information system of the Operator, as well as to their material carriers only for the performance of job duties;

- establishes the rules of access to personal data processed in the Operator's information system, and also ensures the registration and accounting of all actions with it;
- makes an assessment of the harm that may be caused to the subjects of personal data in the event of a violation of the Federal Law "On Personal Data";
- identifies threats to the security of personal data when it is processed at the Operator's information system;
- applies organizational and technical measures and uses the information security tools necessary to achieve the specified level of personal data security;
- detects unauthorized access to personal data and takes measures to respond, including the restoration of personal data modified or destroyed due to unauthorized access to it;
- evaluates the effectiveness of measures taken to ensure the security of personal data prior to the commissioning of the Operator's information system;
- carries out internal control over the compliance of personal data processing with the Federal Law "On Personal Data", corresponding laws and regulations, the requirements for the protection of personal data, the Policy, the Regulations and other local acts, including control over the measures taken to ensure the security of personal data and their security level during processing in the information system of the Operator.

5.3. The client agrees and undertakes not to disclose to third parties his own login and password used for identification on the site.

5.4. The client agrees and undertakes to ensure due diligence in storing and using the login and password (including, but not limited to: use licensed antivirus software, use complex alphanumeric combinations when creating a password, not making available to third parties a computer or other equipment installed on it username and password of the client, etc.)

5.5. If the Operator is suspicious about the use of a client account by a third party or malicious software, the Seller has the right to unilaterally change the client password.

## 6. Rights of personal data subjects

6.1. The subject of personal data has the right: to obtain personal data related to this subject, and information relating to its processing; to clarify, block or destroy his personal data in case they are incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing; revocation of their consent to personal data processing; to protect their rights and legitimate interests, including damages for losses and moral damages in legal form; to appeal the actions or omissions of the Operator to the authorized body for the protection of the rights of personal data subjects or in legal form.

6.2. In order to exercise their rights and legitimate interests, personal data subjects have the right to contact the Operator or send a request in person or with the help of a representative. The request must contain the information specified in Part 3 of Art. 14 of the Federal Law "On Personal Data".