

## POLICY FOR PERSONAL DATA PROCESSING

### 1. Terms and definitions

- 1.1. Personal data (PD) means any information relating to a directly or indirectly defined or being defined individual (subject of personal data).
- 1.2. Personal data subject (PDS) means an individual who is directly or indirectly identified or determined by the PD.
- 1.3. Personal data information system (PDIS) means a set of data contained in personal databases and providing processing of information technologies and technical means by them.
- 1.4. Personal data processing means any action (operation) or a set of actions (operations) performed using automation tools or without using such tools with PD, including collecting, recording, systemizing, accumulating, storing, updating (updating, modification), extracting, using, transfer (granting, giving access), depersonalization, blocking, removal, destruction of PD.
- 1.5. Operator means the Ecoten Ltd. organizing and (or) processing PD, as well as defining the objectives of PD processing, the composition of PDs to be processed and actions (operations) performed with PD.
- 1.6. Provision of personal data means actions aimed at disclosing PD to a specific person or a certain circle of persons.
- 1.7. Destruction of personal data means actions, as a result of which it is impossible to restore the PD in the PDIS and (or) the result of which the material carriers of the PD are destroyed.

### 2. Purpose and scope

- 2.1. This Policy on the processing of personal data (hereinafter referred to as the Policy) defines the principles and conditions for the processing and protection of PD, measures to protect PD, the Operator's responsibilities in processing them.
- 2.2. This Policy was developed in accordance with the Federal Law No. 152-FZ "On Personal Data" from 27.07.2006. (hereinafter referred to as "FZ-152").
- 2.3. This Policy applies to all processes for collecting, recording, systemizing, storing, keeping, clarifying, extracting, using, transferring (providing, accessing), depersonalizing, blocking, deleting, destroying PDs using automation means and without using such means .

### 3. Goals and scope of personal data processing

#### 3.1. The PD is processed by the Operator in order to:

- fulfill the obligations under agreements concluded with PDS;
- organize the delivery of the ordered / purchased goods to the PDS.

#### 3.2. The content and volume of the processed PD includes the following information about the PDS:

- first and last name;
- e-mail address;

#### 4. Principles of processing personal data

Processing of PDs by the Operator is carried out on the basis of the following principles:

- legality and fair basis;
- restricting the processing of PDs by achieving specific, predefined and legitimate objectives;
- processing only those PDs that meet the objectives of their processing;
- avoiding pooling databases containing PD, processing of which is carried out for purposes incompatible with each other;
- conformity of the content and volume of processed PD to the stated processing objectives;
- ensuring the accuracy, adequacy and relevance of PD in relation to the objectives of processing PD;
- destroying or depersonalizing PD upon reaching the objectives of their processing, or in case of a loss of the need to achieve these goals, if the Operator can not eliminate the violations of the PD, unless otherwise provided by FZ-152.

#### 5. Conditions for processing personal data

5.1. The operator performs the processing of the PD if at least one of the following conditions exists:

- processing of the PD is performed with the consent of PDS to process its PD;
- processing of PD is necessary to achieve the objectives stipulated by the international treaty of the Russian Federation or the law for the implementation and performance of functions, powers and duties imposed by the legislation of the Russian Federation on the Operator;
- processing of PD is necessary for the performance of a contract to which the PDS is either party or beneficiary, or to conclude a contract on the initiative of the PDS or a contract under which the PDS will be the beneficiary;
- processing of PD is necessary to implement the rights and legitimate interests of the Operator or third parties or to achieve socially significant goals, provided that the rights and freedoms of the PDS are not thereby violated;

#### 6. Consent of the subject of personal data to the processing of his personal data

6.1. PDS decides to grant his PD and agrees to their processing freely, by his own will and in his interest. Consent to the processing of the PD may be given by the PDS or its representative in any form that allows confirmation of the fact of its receipt, unless otherwise specified by FZ-152.

The obligation to provide proof of the receipt of the consent of the PDS to the processing of his PD or evidence of the grounds specified in FZ-152 is vested in the Operator.

#### 7. Rights of the subject of personal data

7.1. PDS is entitled to receive from the Operator information related to the processing of his PD, including:

- confirmation of the fact that the PD is processed by the Operator;
- legal grounds and objectives for processing PD;
- objectives and methods of processing PD used by the Operator;

- name and location of the Operator, information about the persons (with the exception of the Operator's employees) who have access to the PD or whom it can be disclosed by the PDS on the basis of a contract with the Operator or on the basis of FZ-152;
- processed PD related to the relevant PDS, the source of its receipt, unless another procedure for the submission of such data is provided for by FZ-152;
- processing time for PD, including the time frame for their storage;
- procedure for the implementation by the PDS of the rights provided for by FZ-152;
- information on the transboundary data transfer that has been or is being expected;
- name, surname, patronymic and address of the person carrying out the processing of the PD on behalf of the Operator, if the processing is entrusted or will be entrusted to such person;
- other information provided by FZ-152 or other federal laws.

7.2. The PDS has the right to require from the Operator to clarify his PD, block or destroy it if the PD is incomplete, obsolete, inaccurate, illegally obtained or not necessary for the stated purpose of processing, and also take measures provided by law to protect its rights.

7.3. PDS has the right to demand, and the Operator shall immediately terminate the processing of its PD at the request of the PDS.

7.4. It is prohibited to take decisions based solely on automated processing of PD that generate legal consequences with respect to PDS or otherwise affect his rights and legitimate interests, with the exception of cases stipulated by FZ-152, or with the written consent of PDS.

7.5. If the PDS considers that the Operator is processing his PD in violation of the requirements of the law or otherwise violates his rights and freedoms, the PDS is entitled to appeal against the actions or omissions of the Operator to the Authorized body for the protection of the rights of subjects of personal data or in court.

7.6. PDS has the right to protect his rights and legitimate interests, including compensation for damages and (or) compensation for moral harm in the courts.

## 8. Measures to ensure safety of personal data during processing

8.1. The Operator, when processing the PD, takes the necessary legal, organizational and technical measures to protect the PD from unauthorized or accidental access to, destroy, change, block, copy, provide, distribute the PD, and also from other illegal actions against the PD.

8.2. The safety of PD is achieved, in particular, with the help of:

- development and approval of local acts on the issues of processing and protection of PD;
- application of legal, organizational and technical measures to ensure the safety of PD;
- identification of threats to the safety of PDS during their processing in PDIS;
- application of organizational and technical measures to ensure the safety of the PD when processing it in the PDIS necessary to meet the requirements for the protection of PD, the implementation of which ensures the established levels of protection of the PD;

- application of information protection means that the procedure of conformity assessment is fulfilled in accordance with the established procedure;
- evaluation of the effectiveness of the measures taken to ensure the safety of the PD before the commissioning of the PDIS;
- detection of the facts of unauthorized access to PD and taking measures;
- restoration of PD modified or destroyed due to unauthorized access to it;
- establishment of rules for access to the PD processed in the PDIS, as well as ensuring the registration and recording of all actions performed with the PD in the PDIS;
- implementation of internal control over the compliance of the Operator of processing PD with FZ-152, by-laws and local acts;
- assessment of the harm that can be caused to the PDS in case of violation of FZ-152, the ratio of this harm and measures taken by the Operator aimed at ensuring the fulfillment of the duties stipulated by FZ-152;
- compliance with conditions that preclude unauthorized access to the PD material carriers and ensure the safety of the PD;
- familiarizing employees of the Operator who directly handle the PD with the provisions of the legislation of the Russian Federation on the PD, including requirements for the protection of PD, local acts on the processing and protection of the PD, and training of Operator's employees.

## 9. Final Provisions

9.1. This Policy is a public document and is published on the Operator's website - <http://timedorto.ru>.

9.2. The provisions of this Policy are reviewed in the following cases:

- when changing the legislation of the Russian Federation in the field of processing and protecting the PD;
- when changing the objectives of processing the PD, the structure of information and / or telecommunications systems (or the introduction of new ones);
- when applying new technologies for processing the PD (including transmission, storage);
- if there is a need to change the processing of the PD associated with the Operator's activities;
- based on the results of control over compliance with the requirements for the processing and protection of PD;

After reviewing the provisions of this Policy, its updated version is published on the Operator's website - <http://timedorto.ru>

In case of failure to comply with the provisions of this Policy, the Operator shall be liable in accordance with the current legislation of the Russian Federation.

Consent to the processing of personal data

I, with my will and in my interest, agree to processing, including collection, systematization, accumulation, storage (clarification, updating, modification), use, transfer to third parties, depersonalization, blocking and destruction of

my personal data - name, contact phone number, e-mail address, to the Ecoten LLC, for the purpose of transferring and processing my application to the Ecoten Oy.

I confirm that the personal data and other information relating to me (name, address, registration or residence, contact phone number, e-mail address) are provided by me to the Owner by making them when registering the application by filling out a special form on the site <http://timedorto.ru> automatically and the information is reliable.

I agree that my personal data will be processed in ways that correspond to the purposes of processing personal data, without the possibility of making a decision based solely on the automated processing of my personal data.

The consent is given by me indefinitely, from the moment of transfer of my personal data to the Owner.

This consent can be withdrawn by me at any time by sending a written application to the Owner: 197110, St. Petersburg, Konstantinovsky Avenue, 18, letter A, build. 11-N or to the e-mail address: [des@ecoten.ru](mailto:des@ecoten.ru)