

# Privacy Policy

This Privacy Policy of Silmar Group LLC regulates the conditions and procedure of personal data processing by Silmar Group LLC when providing features presented in the service.

## Terms and Definitions

**Company** – Silmar Group Limited Liability Company, located at the address: Saint Petersburg, prospekt Obukhovskoy Oborony, 70, bldg. 3.

**User** – any individual accessing the Service via the Internet.

**Service** – the website <https://en.silmar.ru/>, as well as other interfaces belonging to the Service Owner, through which the User can access offers of services with third parties, information about which is posted on the website.

All matters relating to the use of the Service shall be governed by the information located at <https://en.silmar.ru/>.

**Personal Data** – any information relating to a directly or indirectly defined or identifiable individual (User).

**Processing of Personal Data** – any action or set of actions performed with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (provision, access), blocking, deletion, destruction.

**Partners of the Company** – legal entities with whom the Company conducts joint promotions and other marketing activities, analytical research to improve the Service and provide the User with additional opportunities. Such entities may provide the Company (affiliates of the Company) with information and analytical services for these purposes.

## General Provisions

This Policy applies to any information, including Personal Data, being transmitted by Users to the Company in the process of selling goods using the Service, and determines the procedure and terms of Processing of such information.

## User's Information Being Processed when Using the Service

In the process of using the Service by the User, the Company may process the User's Personal Data in order to provide features.

For these purposes, the Company has the right to enter Personal Data into information systems, store and process it by any means not contrary to the laws of the Russian Federation during the term of the legal relationship with the User for the performance of features provided in the Service, as well as the terms established by applicable law. Upon achievement of the purposes of processing or in case of loss of necessity in achievement of these purposes, unless otherwise provided by the legislation or otherwise separately agreed by the parties, the Personal Data being processed shall be destroyed.

Mandatory information is marked in the Service with special markings, the rest of the information is provided at the discretion of Users.

The Company does not process biometric data or information relating to race, nationality, political opinions, religious or philosophical beliefs or intimate life.

### **Principles of Personal Data Processing**

The Company processes Personal Data on the basis of the following principles:

- Processing of Personal Data is carried out on a lawful and fair basis;
- Processing of Personal Data is limited to the fulfilment of specific, predetermined and legitimate purposes;
- Processing of Personal Data incompatible with the purposes of Personal Data collection is not allowed;
- It is not allowed to merge databases containing Personal Data processed for incompatible purposes;
- Only Personal Data that is relevant for the purposes for which it is processed shall be processed;
- The content and scope of Personal Data being processed correspond to the stated purposes of processing. The Personal Data being processed may not be redundant in relation to the stated purposes of their processing;
- When processing Personal Data, the accuracy of Personal Data, its sufficiency and, where necessary, relevance in relation to the purposes of Personal Data processing is ensured; necessary measures are taken to delete or clarify incomplete or inaccurate Personal Data;
- Personal Data shall be stored in a form that allows to identify the User or other subject of Personal Data for no longer than required by the purposes of Personal Data processing, unless the period of storage of Personal Data is established by federal law, consent to processing, contract to which the subject of Personal Data is a party, beneficiary or guarantor;
- Personal Data being processed shall be destroyed when the purposes of processing have been achieved or when it is no longer necessary to achieve those purposes, unless otherwise provided for by federal law;
- Processing of Personal Data is not used for the purpose of causing property and/or moral damage to the subjects of Personal Data, impeding the realization of their rights and freedoms.

## **Terms and Conditions of Processing of User's Information and Transfer Thereof to Third Parties**

Information is processed by the Company in accordance with this Policy and the Company's internal regulations, as well as the laws of the Russian Federation.

Processing of the User's information, including Personal Data, is carried out on the basis of the need for the Company to fulfil the terms and conditions of the features provided in the Service during the entire period of their validity.

In addition, the Company has the right to process Personal Data in cases when such processing is necessary to exercise the rights and legitimate interests of the Company or third parties, if the rights of the User are not violated, as well as when processing is necessary to fulfil the functions, powers and duties imposed by the legislation of the Russian Federation.

Direct contact with the User to promote goods, works and services in the Online Store, or to collect feedback on the Service, is allowed only with the consent of the User, given in the process of registration and/or use of the Service. The User decides to provide information, including Personal Data, and consents to their Processing freely, of their own free will and in their own interest. The consent to the Processing of information is given by the User by ticking the appropriate box in the process of registration and/or use of the Service. The Company may request the User's consent repeatedly at each request of the User. In the event that consent is not given when the Company subsequently requests it (e.g. by filling in web forms with the appropriate consent tick box), the consent previously given will not automatically be recognized as withdrawn and will continue to be valid for the period specified in the consent.

In the absence of the User's consent to the processing of personal data for the purpose of promoting goods, works and services, the Company makes direct contact with the User only for the performance of duties provided for by law (for example, in the case of sending the User an electronic receipt for the purchase of goods in the Service).

Information processing is carried out by the Company, as well as by other third parties who are engaged by the Company to process, or to whom Personal Data is transferred for the specified purposes in accordance with the laws of the Russian Federation. Such third parties may include, inter alia:

1. Silmar Group LLC (INN (Taxpayer Identification Number): 7805792489);
2. The Company's counterparties to whom the Company transfers Personal Data on the basis of a contract, including companies rendering services of providing and ensuring the functioning of information systems used by the Company, call center services, as well as:
  - counterparties with whom the Company works as a freight forwarder or carrier, providing them with the opportunity to place offers to provide services.
  - counterparties providing services to the Company for anti-fraud purposes. Such counterparties may be provided by the Company only with the Users' phone numbers.

- counterparties providing services to the Company for collecting and processing feedback from Users about the Service, conducting surveys and research among Users.

3. The Company's Partners;

4. State/municipal authorities in cases established by law.

The Company has the right to engage third parties to process the received Personal Data and/or transfer the received data to them, as well as receive data from them for the specified purposes without additional consent of the User, provided that these third parties ensure confidentiality and security of personal data during processing. Processing of Personal Data by these third parties with or without the use of automation tools is allowed, as well as any actions on processing of Personal Data that do not contradict the legislation of the Russian Federation.

The Company undertakes to take the necessary legal, organizational and technical measures to protect the personal data received from unlawful or accidental access thereto, destruction, modification, blocking, copying, presentation, dissemination of personal data, other unlawful actions in relation to personal data, and to comply with the principles and rules of personal data processing provided for by Federal Law No. 152-Φ3 *on Personal Data* dated 27.07.2006 and other relevant regulations.

The Company is prohibited from making decisions based solely on automated processing of Personal Data that give rise to legal consequences with respect to the User or otherwise affect their rights and legitimate interests.

The Company does not place Personal Data in publicly available sources without the written consent of the User or other subject of Personal Data.

### **Ensuring Security of the User's Information**

The Company defines in internal documents binding on all employees of the Company, as well as in the relevant agreements with Partners, counterparties and other third parties as they relate thereto:

- procedures for granting access to information;
- procedures for amending Personal Data to ensure their accuracy, reliability and relevance, including in relation to the purposes of processing;
- procedure for destroying or blocking Personal Data if such procedure is necessary;
- procedures for processing of User's and Personal Data subjects' (their legal representatives') requests for cases provided for by Federal Law No. 152-Φ3 *on Personal Data* dated 27.07.2006, in particular, the procedure for preparing information on the availability of Personal Data related to a particular subject, information necessary to enable the subject (their legal representatives) to familiarize themselves with their Personal Data, as well as the procedure for processing requests to clarify Personal Data, block or destroy them if they are incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;

- procedure for processing the request of the authorized body for the protection of the rights of Personal Data subjects;
- procedures for obtaining the User's or Personal Data subject's consent to the processing and transfer of their Personal Data to third parties;
- procedures for transferring Personal Data to third parties;
- procedures for handling tangible carriers of Personal Data;
- procedures necessary to notify the authorized body for the protection of the rights of Personal Data subjects within the terms established by Federal Law No. 152-ФЗ *on Personal Data* dated 27.07.2006.

The Company has introduced, operates and undergoes periodic review (control) of its information protection system. The Company applies necessary and sufficient legal, organizational and technical measures, including, inter alia:

- development of internal documents on Personal Data processing issues, as well as local instruments establishing procedures aimed at prevention and detection of violations of the legislation of the Russian Federation, elimination of consequences of such violations;
- protection of Personal Data from unauthorized access, unlawful processing or transfer, as well as from loss, distortion or destruction;
- determination and implementation, prior to the introduction of new processes of Personal Data processing and new information systems of personal data, of technical and organizational measures ensuring the protection of Personal Data;
- identification of threats to the security of Personal Data during their processing in information systems;
- establishing rules of access to Personal Data processed in information systems, as well as ensuring registration and accounting of actions performed with Personal Data in information systems;
- monitoring and evaluation of the effectiveness of the measures being applied;
- detecting facts of unauthorized access to Personal Data and other incidents, taking measures to eliminate the consequences;
- granting access to Personal Data only in cases and in the manner prescribed by the legislation of the Russian Federation;
- familiarization of the Company's employees directly involved in processing Personal Data with the provisions of the legislation of the Russian Federation, including requirements to Personal Data protection, documents defining the Company's policy with regard to Personal Data processing, local instruments on Personal Data processing, requirements to non-automated processing, and (or) training of the said employees.

The Company has appointed persons responsible for organizing the processing and ensuring the security of Personal Data.

### **Change of Information by the User**

The User may at any time change the information or part thereof provided thereby by sending a corresponding request to the Company.

### **Interaction with the User on the Issues of Information Processing**

The User has the right to receive information on how the Company processes information and Personal Data, including information on the list of Personal Data, grounds, purposes and terms of their processing, methods of processing and destruction of Personal Data, third parties to whom they are transferred, as well as other information. In addition, the User may submit a request for clarification or amendment of Personal Data. The User also has the right to withdraw the consent to the processing of Personal Data provided to the Company.

In case of any questions or requests regarding the processing of Personal Data using the Online Store, the User may contact the Company by e-mail at [info@silmar.spb.ru](mailto:info@silmar.spb.ru) or by writing to the Company.

If there are subscriptions to receive information and advertising communications, in addition to the above methods, the User may request the Company to unsubscribe from such communications:

- by activating the automatic “Unsubscribe” function via a link contained in the e-mail or SMS message (if the function is available and supported by the User’s device) containing the communication. In this case, the Company will stop sending communications to the e-mail address or phone number from which the function was activated;
- by activating the corresponding function in the User’s personal account in the Service (if the function is available and supported by the User’s device).

### **Final Provisions**

The Policy may be updated or otherwise amended by the Company from time to time, and any changes shall be subject to publication by the Company and shall be effective upon publication.