

## PERSONAL DATA PROCESSING POLICY

### 1. General Provisions

- 1.1. This Personal Data Processing Policy on <https://www.kkraft.ru> (hereinafter – the “Policy”) adopted by the website Administration establishes the purposes, principles, conditions and methods of Personal Data Processing, as well as the rights of Personal Data Subjects, measures of the Personal Data protection.
- 1.2. This Policy has been developed in accordance with the Constitution of the Russian Federation, Federal Law No. 152-FZ “On Personal Data” dd. 27.07.2006, Federal Law No. 149-FZ “On Information, Information Technologies and Protection of Information” dd. 27.07.2006, as well as other regulatory and legal acts, including relevant by-laws of the branch departments and other state bodies whose competence includes the development of policy, control and supervision over observance of legislation on the information circulation, in particular, in the area of personal data processing. All issues related to the personal data processing not reflected in the text of this Policy shall be settled in accordance with the current legislation of the Russian Federation in the area of personal data.
- 1.3. The purpose of this Policy is the safeguard of the Users’ rights, including the proper protection of User’s Personal Data from unauthorized access and disclosure, when the Administrator uses Personal Data in the course of its business activities.
- 1.4. The legal basis for the personal data processing is the consent of the User, given in accordance with clause 7.1 hereof.

### 2. Terms and Definitions

- 2.1. **Administrator** – Limited Liability Company “Kraft” (PSRN 1037843062553, ITN 7806115708, address: 197022, Saint Petersburg, 5 Medikov Prospekt, letter B, prem. 7-H of.110), legal entity established under the laws of the Russian Federation conducting its business using the Website, located in the public data and communications networks of the Internet at: <https://www.kkraft.ru>.
- 2.2. **Personal Data** – information specified in section **Ошибка! Источник ссылки не найден.** hereof, related to a directly or indirectly determined or designated individual person, including User, such as the one that User provides about himself/ herself during the use of the Website, and that is automatically transmitted to the Administrator because the User uses devices providing access to the Website and software used for specified purposes.
- 2.3. **Personal Data Processing** – an action (operation) or a set of actions (operations) performed by the Administrator, as well as by third parties, using automation facilities or without using such facilities with Personal Data using the methods specified in clause 5 hereof.
- 2.4. **Website** – an Internet resource located at: <https://www.kkraft.ru> (including all levels of the specified domain, both functioning on the date of this Policy adoption by the User and launched and put into operation later) available to the User from various devices connected to the Internet, and including information on goods and/ or services of the Administrator.
- 2.5. **User** – an individual, who has visited the Website, has reached the age allowed in accordance with the legislation of the Russian Federation for acceptance of this Policy, as well as other rules in accordance with which the Website operates.

### **3. Main Principles of Personal Data Processing**

3.1. Personal data processing of the Users is carried out according to the Article 5 of the Federal Law No. 152-FZ "On Personal Data" dd. 27.07.2006, and particularly it is based on the following principles:

- good faith;
- compliance of the purposes of the personal data processing with the purposes predetermined and stated during the Personal Data collection and by the powers of the Website Administrator;
- compliance of the volume and nature of the processed personal data, methods of personal data processing with the purposes of personal data processing;
- personal data processing is carried out on legal and equitable basis;
- storage of personal data is carried out in a form that allows to determine the personal data subject, only as long as the purpose of processing personal data require;
- adoption of technical, organizational and legal measures aimed at ensuring the security (protection) of personal data in order to prevent unauthorized access by third parties.

### **4. Personal Data Subjects**

4.1. The Personal Data of the Users provided their personal data to the Administrator by filling out special forms on the Website are processed on the Website, and as the result of the automatic transfer of the Personal Data when the User uses devices providing access to the Website and software used for the specified purposes.

The Users indicated in this clause are referred to as the **Personal Data Subjects**.

### **5. Purpose and Terms of the Personal Data Processing**

5.1. The automated and non-automated processing of personal data is carried out on the Website.

5.2. The personal data processing of the personal data subjects is carried out for the following purposes:

- identification of the personal data subjects in connection with the Website use;
- connection with the personal data subjects, including for the purposes of sending notifications, offers and information related to the use of the Website, the products produced by the Administrator and the services provided by the Administrator, as well as for processing requests and applications of the indicated persons;
- promotion of goods and services of the Administrator, including through the direct contacts with the personal data subjects;
- improvement of the quality of goods and services of the Administrator, including through surveys, statistical and other studies based on the provided data;
- Website Administration;
- performance of the duties by the Administrator assigned by the legislation of the Russian Federation.

- 5.3. For the purposes specified in clause 5.2 of this Policy, the Administrator, independently or through third parties, performs the Personal Data Processing, both using or without using automation facilities, as follows: recording, systematization, accumulation, storage, adjustment (update, change), extraction, use, distribution, including provision to third parties, engaged by the Administrator for the Personal Data Processing for the purposes and by methods specified herein (including persons maintaining the Website operability), anonymization, blocking, deletion, destruction of the Personal Data.
- 5.4. The term for the Personal Data Processing is determined by achieving the purpose of Personal Data Processing specified herein, except in cases where the Personal Data Subject refuses from the Personal Data Processing and sends a document requesting to stop the Personal Data Processing and destroy Personal Data.
- 5.5. Trans-bounder transfer of the Personal Data is allowed for the same purposes as specified in clause 5.2 hereof in case of equipment placement that ensures the operation of the Website outside the Russian Federation.

## **6. List of Processed Personal Data**

- 6.1. The list of the Personal Data processed by the Administrator is determined by applicable law and this Policy. The processed personal data may include: name, surname, gender, mobile phone number, email address, as well as any information automatically transmitted to the Administrator in connection with the User's use of devices that provide access to the Website and software used for the specified purposes.

## **7. Procedure for Granting Consent to the Personal Data Processing**

- 7.1. By ticking "I give my consent to the processing of my personal data" under a special form on the Website, offering the input of some Personal data from those specified in this Policy, and/ or using the Website, the User voluntarily agrees with the terms of this Policy and gives unconditional consent to the processing of personal data specified herein and in accordance with all its terms.
- 7.2. If the Personal Data Subject does not agree with this Policy, or disagrees with it in the future, then such Personal Data Subject shall stop using the Website and, using the methods specified in clause 8.1 hereof, notify the Administrator in writing, sending an appropriate statement of consent withdrawal and destruction of the personal data to the Administrator.

## **8. Final Provisions**

- 8.1. The Personal Data Subject owns the rights provided for by the Federal Law No. 152-FZ "On Personal Data" dd. 27.07.2006 as well as other regulatory and legal acts that determine the procedure for the personal data processing.
- 8.2. The Personal Data Subject may withdraw previously given consent to the personal data processing. The Personal Data Subject may require the Administrator to clarify his/ her Personal data, to block or destroy them if personal data are incomplete, outdated, inaccurate, illegally obtained or not needed for the stated purpose of processing, as well as to take measures provided for by law to protect their rights. The specified rights are exercised by sending an appropriate application to the Administrator:

- to the email address: [soller@kkraft.ru](mailto:soller@kkraft.ru);

- to the address of the Administrator by registered mail with declared value and list of enclosures: 197341, Russia, Saint Petersburg, 2 Afonskaya Street, Office 2-306.

8.3. When receiving an application for consent withdrawal and/ or destruction, blocking, updating of Personal Data, the Administrator takes necessary and sufficient measures to execute the said application within a period not exceeding 30 days from the receipt of such application.

In case the Personal Data Subject withdraws the consent to the Personal Data Processing, the Administrator may continue the Personal Data Processing without the consent of the Personal Data Subject if there are causes provided by law.

8.4. The Administrator takes sufficient and required technical, organizational and legal measures aimed at ensuring the security (protection) of the Personal Data to prevent an unauthorized access by third parties, as well as the destruction, alteration, blocking, copying, distribution of such data, in particular:

- use of antivirus software on the Website computers;
- restriction of access to the premises used by the Administrator to conduct activities;
- appointment of the person responsible for arrangement of the Personal data processing by the Administrator;
- establishment of local rules for accessing and processing personal data, as well as familiarizing employees of the Administrator with them;
- other measures provided for by the legislation to promote the duties performance of the Administrator to ensure the security of Personal Data.

8.5. This Policy becomes effective on the date of its approval by the Administrator, namely from April 30, 2019.

8.6. The Administrator reserves the right to unilaterally change this Policy. When making changes to the Policy, the date of the last change is indicated. New Policy is valid from the moment it is posted on the Website, unless otherwise provided by the Policy. The current version of the Policy is always at free access at: [www.kkraft.ru](http://www.kkraft.ru).

8.7. The legislation of the Russian Federation governs this Policy and any relations connected with it.