

## PERSONAL DATA PROCESSING POLICY

This Personal Data Processing Policy (the “Policy”) sets out the rules on which De la Rey Consulting Ltd. (the “Company”) will handle the User’s personal data received by the Company through the website <https://delarey.ru/en/>

This Policy, including the interpretation of its provisions and procedure for adoption, implementation, amendment and termination, shall be subject to the laws and legislation of the Russian Federation, including, but not limited to, the Constitution of the Russian Federation, Federal Law of the Russian Federation No.149-FZ dated July 27, 2006 “On Information, information technologies and information protection”, Federal Law of the Russian Federation No.152-FZ dated July 27, 2006 “On Personal Data”, Decree No. 1119 of the Government of the Russian Federation dated November 1, 2012 “On Approving Requirements for the Protection of Personal Data While Being Processed in Personal Data Information Systems”, Decree No.687 of the Government of the Russian Federation dated September 15, 2008 “On Approving the Regulation on the Peculiarities of Processing Personal Data without Using Automation Tools”, Order No.21 of the FSTEC of Russia dated February 18, 2013 “On Approving the List and Scope of Organizational and Technical Measures to Ensure the Security of Personal Data While Being Processed in Personal Data Information Systems” and other applicable regulations.

### 1. TERMS AND DEFINITIONS

1.1 “Website” shall mean the website, namely an information resource located on the Internet, which has a unique URL and is intended for publishing information on the Internet at <https://delarey.ru/en/>, which is administered and owned by the Company.

1.2 “User” shall mean a person being a visitor to the Website.

1.3 “Personal data” shall mean any information relating directly or indirectly to a specific or identifiable individual (owner).

1.4 “Processing of personal data” shall mean any action (operation) or a cumulative actions (operations) in respect of personal data with or without using automation facilities, including collection, recording, systematization, accumulation, storage, refinement (update, alteration), extraction, use, transfer (distribution, provision, access) for processing by third parties, including cross-border transfer to foreign countries, depersonalization, blocking, deletion, destruction of personal data.

1.5. “Personal Data Distribution” shall mean any actions aimed at the disclosure of personal data to an indefinite set of persons.

1.6 “Personal Data Provision” shall mean any actions aimed at disclosing personal data to a certain person or a certain set of persons.

1.7 “Cross-border Transfer of Personal Data” shall mean the transfer of personal data to another country to a foreign authority, a foreign person or a foreign legal entity.

1.8 "Personal Data Depersonalisation" shall mean any actions making it impossible to identify personal data as related to a certain data subject without involving additional information.

## 2. PERSONAL DATA

2.1. The Company can process the following personal data of the User:

(i) Data which are provided by the User to the Company by himself/by herself when using the Website, including name, surname, e-mail address, phone number, and company name.

(ii) Data which are transmitted automatically, depending on the settings of the User's software, including, but not limited to: IP address, cookies (including technical, statistical, functional and others), telecom operator networks, data on the software and hardware used by the User when working in the communication network, including the Internet, communication channels, data about information and materials obtained using the Website.

2.2. The User understands and agrees that third-party software may be used on the Website which may result in such third parties receiving anonymized data referred to in paragraph 2.1

(ii). Such third-party software may include, but not limited to: systems designed for collecting visiting statistics (for example, Google Analytics, etc.); social plugins (blocks) of social networks (for example, Facebook, etc.); banner displaying systems; other systems designed for collecting depersonalized information.

## 3. PURPOSES OF PERSONAL DATA PROCESSING

3.1. The Company may use Personal data for the following purposes:

(i) ensuring communication with the User regarding the Company's activity in order to inform the User about the services provided by the Company and to specify possible cooperation terms;

(ii) sending to the User circulating emails featuring various content;

(iii) using anonymized data for improving the quality of the Website and its content;

(iv) using anonymized data for target advertising and/or information materials;

(v) conducting statistical, marketing and other surveys based on anonymized data.

## 4. GROUNDS FOR PERSONAL DATA PROCESSING

4.1 The Company process the User's Personal Data only if the User fills in and sends the Personal data by himself/by herself through the special form on the Website. By filling in the special forms and sending his/her Personal data to the Company, the User gives his/her continuing consent authorizing the Company to process his/her Personal data by any means for the purposes set out in this Policy.

4.2 Anonymized Personal data are processed by the Company as long as it is allowed by the browser settings selected by the User.

## 5. PERSONAL DATA PROTECTION

5.1 The Company shall keep and process the Personal Data, maintain its confidentiality and protect it from unauthorized access and distribution.

5.2 The Company shall implement sufficient technical and organizational measures to protect the Personal data from unauthorized access, unlawful destruction, loss, distortion, alteration, illegal and incorrect use, disclosure and other illegal forms of processing.

## 6. PERSONAL DATA TRANSMISSION

6.1. The Company may transmit the User's Personal data to third parties in the following cases:

- (i) The User consents to such actions, including when the User applies the settings of the software which do not restrict the provision of certain information;
- (ii) at the request of a court or other authorized government authority subject to the procedure established by law.

## 7. USER RIGHTS

7.1. The User may request the Company to make changes to his/her Personal data if it is incorrect, incomplete or has been modified.

7.2. In cases permitted by the applicable laws of the Russian Federation, the User may:

- (i) to request the Company to delete his/her Personal data or part thereof;
- (ii) to request the Company to limit the processing of his/her Personal data;
- (iii) to withdraw from the Company his/her consent to the processing of his/her Personal data;
- (iv) to exercise other rights provided by the applicable laws of the Russian Federation.

7.3. In connection with all matters relating to the processing of Personal data by the Company, deletion, amendment, suspension of processing thereof and other issues relating to the Personal data, the User may contact the Company by sending a request to the email address: [site@delarey.ru](mailto:site@delarey.ru).

## 8. FINAL PROVISIONS

8.1. This Policy is of indefinite duration and may be amended and/or supplemented by the Company at any time at its sole discretion without the need to obtain the consent of the User. All amendments and/or additions in or to or a new version of the Policy shall be posted by the Company on the Website and come into force on the date on which they are so posted. The User undertakes to timely and independently familiarize himself/herself with all amendments and/or additions.

9.3. The up-to-date version of the Policy is available on the Website at [https://delarey.ru/politic\\_en.pdf](https://delarey.ru/politic_en.pdf)