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1. GENERAL PROVISIONS

- 1.1 This document is the Personal Data Processing Policy of the "Food Export Trade" Limited Liability Company ("Operator") (hereinafter referred to as the Policy).
- 1.2 Ensuring the protection of the User's personal data is one of the Operator's priorities.
- 1.3 The purpose of the policy is to ensure the protection of human and civil rights and liberties in his personal data processing, compliance with the requirements of Russian legislation regarding personal data.
- 1.4 This Policy describes personal data processed by the Operator, methods and purposes of processing, as well as measures to protect such personal data.
- 1.5 The policy can be found in the permanent public domain at the link: <u>https://www.foodexporttrade.com/disclosure-of-info/</u>?
- 1.6 Individual business processes of the Operator may change. Therefore, the Policy may be subject to amendments. The current version of the Policy is always published on the website, and the User can view its previous versions at the links: <u>https://www.foodexporttrade.com/personal-data-policies-arch/</u>

2. TERMS AND DEFINITIONS

The Policy uses the terms defined by Federal Law "On Personal Data" No. 152-FZ of July 27, 2006, other regulatory acts of the Russian Federation, as well as the terms defined by the Operator:

Personal data- is any information relating directly or indirectly to an individual, allowing to identify him;

Operator "Food Export Trade" Limited Liability Company

User - any visitor of the website whose personal data is processed.

 Website
 website
 https://www.fet.ru/,
 https://foodexporttrade.com/,

 https://cn.foodexporttrade.com/

3. LEGAL GROUNDS FOR PERSONAL DATA PROCESSING

- agreements with Users and legal entities they represent;
- consent for their personal data processing;
- other grounds provided for by the Federal Law "On Personal Data".

4. METHODS OF THE USER'S PERSONAL DATA PROCESSING BY THE OPERATOR

- 4.1 Data can be processed both electronically (with the use of automation tools) and manually (without the use of automation tools).
- 4.2 To achieve the following purposes, the Operator will collect, record, systematize, accumulate, store, clarify (update, change), extract, use, transfer (provide, provide access), block, delete and destroy personal data.

Purpose	Catego ry	Data summary	Data destroy procedure	Data processing time
Registrati	Individ	Full name;	Deletion from	Until the
on and	ual	Company name;	the Operator's	processing
subseque	entrep	Position;	internal server.	purpose
nt	reneur	E-mail;	Paper media are	achievement or
identificat	S	Phone	destroyed by	consent
ion			shredding (for	withdrawal.

5. PURPOSE OF PERSONAL DATA PROCESSING

(authoriz ation) of the User Processing of the application for the	entitie Co s; Po Emplo ba yees of au legal Da entitie pa s and TI individ PS ual re entrep th reneur ad s ac co E- Ph ba acc co Fu Co Fu Co Fu Co Fu Co Fu Co Fu Co	Full name; Company name; Position; basis and term of authority;	example, using a paper shredder). Machine- readable media are destroyed by warping or media integrity	During the term of the Contract plus 5 years thereafter.	
contract conclusion		Date and place of birth; passport data; TIN; PSRN of IE/OGRN	violation. Destruction period: no more than 30 days		
Check of the contractor		registration address at the place of residence; address of business	since the date of processing purpose		
Contract conclusion and execution		activities/for correspondence; E-mail; Phone; bank details (settlement account, bank name, BIC, correspondent account).	achievement or since the consent withdrawal date.		
Sending of notifications on the contract execution progress		Full name; Company name; Position; registration address at the place of residence; address of business activities/for correspondence; E-mail; Phone;			
Site visit analytics		Cookies (for details see Coo https://www.foodexporttra	ookie Policy) trade.com/disclosure-of-info/?		

6. PROCEDURE AND CONDITIONS FOR PERSONAL DATA PROCESSING

- 6.1 The Operator does not process sensitive personal data relating to race, nationality, political opinions, religious or philosophical beliefs, intimate life, as well as biometric personal data.
- 6.2 Usage, clarification, distribution and destruction of personal data are carried out with the direct participation of the Operator's employees.
- 6.3 The Operator may transfer the User's data to third parties only under the following conditions: with the consent of the User;
 - if the transfer is provided for by an agreement with the Operator;
 - it is required in order to comply with the legal provisions.
- 6.4 In case of loss or unauthorized disclosure of personal data, the Operator shall inform the User about it.
- 6.5 If a data loss occurs, the Operator undertakes:

- to notify Federal Supervision Agency for Information Technologies and Communications within 24 hours;

- conduct its own investigation within 72 hours and notify Federal Supervision Agency for Information Technologies and Communications of its results.

- 6.6 Information about the User and his representatives is stored by the Operator on the internal server.
- 6.7 The Operator has the right to entrust the personal data processing to third person with the User's consent by virtue of the agreement (hereinafter referred to as the instruction of the Operator).

7. PERSONAL DATA PROTECTION

- 7.1 The personal data collected and stored by the Operator are considered confidential information. Such personal data is protected from loss, alteration or unauthorized access as required by law.
- 7.2 To protect the User's personal data, the Operator takes legal, organizational and technical measures.
- 7.3 Legal arrangements:
 - development and publication of the Policy at the website;
 - refusal to process personal data that does not comply with the Policy.
- 7.4 Organizational measures:
 - appointment of persons responsible for personal data processing organization;
 - reducing the number of employees having access to personal data;
 - organization of a permissive system of access to personal data;
 - familiarization of the Operator's employees with the legislation on personal data, personal data protection requirements and local acts of the Operator.
- 7.5 Technical measures:
 - hardware and software;
 - prevention of unauthorized access to personal data;
 - timely detection of cases of unauthorized access to personal data;
 - prevention of impact on the technical means used in the processing of personal data;

- the possibility of immediate recovery of personal data modified or destroyed after unauthorized access;

- constant personal data protection control.

8. USER RIGHTS AND ENJOYMENT

8.1 What information the User can request from the Operator?

- confirmation of the personal data processing ascertainment;
- information about persons who have or may have access to personal data;
- processed personal data, the source of their receipt;
- the enjoyment procedure for the User;
- information on cross-border data transfer;
- name and address of the person processing personal data on behalf of the Operator;
- other information provided by law.
- 8.2 Moreover the User can:
 - get access to personal data;
 - clarify his personal data;
 - request personal data blocking and deleting;
 - appeal against the actions or inaction of the Operator;
- 8.3 The user can send his requests to the Operator:
 - by E-mail: deb@fet.ru;
 - at the address: 630007, Novosibirsk, st. Sovetskaya 5, A, floor 3, office A-301
 - by phone: +7 800 222-78-88
- 8.4 The User can appeal against the actions of the Operator as a personal data operator in his regional office of the Federal Supervision Agency for Information Technologies and Communications.
- 8.5 The request must include the following information:
 - number of the User's identity document;
 - date of issue of the document and information about the issuing authority;

- information confirming the fact of the User's relationship with the Operator.
- 8.6 The Operator must respond to the User within 10 calendar days from the date of the request receipt.
- 8.7 If the Operator cannot provide the User with information upon request (in particular, if the User does not have access rights to such kind of information), the Operator shall provide a reasoned refusal in writing within 10 calendar days.

9. CLARIFICATION, CORRECTION AND TERMINATION OF DATA PROCESSING

- 9.1 If inaccuracies occur, the User can make clarifications by sending notification to the Operator at deb@fet.ru marked "Personal data clarification".
- 9.2 The User can withdraw his consent to the personal data processing at any time by sending notification to the Operator at deb@fet.ru marked "Withdrawal of the personal data processing consent".
- 9.3 The Operator stops processing any User's personal data in the following conditions:
 - expiration of the User's consent;
 - achieving of the personal data processing purposes;
 - detection of illegal personal data processing procedures;
 - liquidation of the Operator.

10. DETAILS OF "Food Export Trade"

"Food Export Trade" OGRN 1177746293911 TIN 7704400223 KPP 540701001 Location and postal address: 630007, Novosibirsk region, Novosibirsk, st. Sovetskaya 5, A, floor 3, office A-301 Phone: +7 800 222 7 88864 E-mail: info@fet.ru

The policy is published at: https://www.foodexporttrade.com/disclosure-of-info/?