

Privacy Policy

1. GENERAL PROVISIONS

The Personal Data Processing Policy (hereinafter referred to as the 'Policy') has been developed in alignment with globally recognized standards for privacy protection. This Policy adheres to the principles and regulations set forth by the General Data Protection Regulation (GDPR) of the European Union, which sets a benchmark for data privacy laws globally. Additionally, the Policy is consistent with the requirements of ISO/IEC 27001 and 27701 standards for information security management. These international frameworks guide our approach to personal data protection, ensuring the safeguarding of individual privacy rights across various jurisdictions and in accordance with international best practices.

This Policy defines the procedure for processing personal data and measures to ensure the security of personal data at **SalesRender** service (hereinafter referred to as the Operator) to protect the rights and freedoms of the individual and citizen in processing his personal data, including the rights to the inviolability of private life, personal and family secrets.

The following main concepts are used in the Policy:

SalesRender service - CRM system for sales management, registered under ECOMTRADESTAR LLP

SalesRender service website - official website address

<https://salesrender.com/>

Automated processing of personal data - processing of personal data using computer technology;

Blocking of personal data - temporary cessation of processing of personal data (except for cases when processing is necessary to clarify personal data);

Personal data information system - a set of personal data contained in databases and information technologies and technical means ensuring their processing;

Depersonalization of personal data - actions as a result of which it is impossible to determine without using additional information the affiliation of personal data to a specific personal data subject;

Processing of personal data - any action (operation) or a set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;

Operator - a state body, municipal body, legal or physical person, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as well as determining the purposes of processing personal data, the composition of

personal data to be processed, actions (operations) performed with personal data;

Personal data - any information related directly or indirectly to a specific or identifiable individual (subject of personal data);

Provision of personal data - actions aimed at disclosing personal data to a specific person or a specific circle of persons;

Distribution of personal data - actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or at familiarization with personal data of an unlimited number of persons, including the publication of personal data in the mass media, placement in information and telecommunication networks, or providing access to personal data in any other way;

Cross-border transfer of personal data - transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual, or a foreign legal entity;

Destruction of personal data - actions as a result of which it is impossible to restore the content of personal data in the personal data information system and (or) as a result of which physical media of personal data are destroyed;

Cookie files - files stored in your web browser that allow SalesRender or a third party to recognize you and your choices. Cookies can be used to collect, store, and share information about your online activities to improve the service functionality.

SalesRender service is obliged to publish or otherwise provide unrestricted access to this Personal Data Processing Policy.

2. PRINCIPLES AND CONDITIONS OF PERSONAL DATA PROCESSING

2.1 Principles of personal data processing

- legality and fair basis;
- restriction of the processing of personal data to the achievement of specific, predefined, and lawful purposes;
- prevention of the processing of personal data incompatible with the purposes of collecting personal data;
- prevention of merging databases containing personal data, which are processed for incompatible purposes;
- processing only those personal data that meet the purposes of their processing;
- correspondence of the content and volume of processed personal data to the declared purposes of processing;
- prevention of processing of personal data that is excessive in relation to the declared purposes of their processing;
- ensuring the accuracy, sufficiency, and relevance of personal data in relation to the purposes of processing personal data;
- destruction or depersonalization of personal data upon achieving the purposes of their processing or in case of loss of the need to achieve these purposes, if the Operator cannot

eliminate the violations of personal data, unless otherwise provided by federal law.

2.2 Conditions for processing personal data

The Operator processes personal data if at least one of the following conditions is met:

- the processing of personal data is carried out with the consent of the subject of personal data to the processing of his personal data;
- processing of personal data is necessary to achieve the purposes provided for by an international treaty of the Russian Federation or law, for the implementation and performance of functions, powers, and duties imposed by the legislation of the Russian Federation on the operator;
- processing of personal data is necessary for the administration of justice, execution of a judicial act, act of another body or official, subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings;
- processing of personal data is necessary for the execution of a contract, a party to which or a beneficiary or guarantor under which is the subject of personal data, as well as for concluding a contract at the initiative of the subject of personal data or a contract under which the subject of personal data will be a beneficiary or guarantor;

- processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator or third parties or for achieving socially significant goals, provided that the rights and freedoms of the subject of personal data are not violated;
- processing of personal data is carried out, access to which is provided to an unlimited number of persons by the subject of personal data or at his request (hereinafter - publicly available personal data);
- processing of personal data is carried out, which must be published or disclosed in accordance with federal law.

2.3 Confidentiality of personal data

The Operator and other persons who have gained access to personal data must not disclose to third parties and distribute personal data without the consent of the subject of personal data, unless otherwise provided by federal law.

2.4 Public sources of personal data

For the purposes of information support, the Operator may create public sources of personal data of subjects, including directories and address books. With the written consent of the subject, his surname, name, patronymic, date and place of birth, position, contact phone numbers, e-mail address, and other personal data reported by the

subject of personal data may be included in public sources of personal data. Information about the subject must be excluded from public sources of personal data at any time at the request of the subject or by decision of the court or other authorized state bodies.

2.5 Collection and storage of cookies

The SalesRender service collects session cookies (automatically deleted after the session ends) and persistent new cookies (stored in the visitor's browser after the end of the old session).

The SalesRender service on its website <https://salesrender.com/> uses cookies for the following purposes:

- Correct operation of certain functions on the website <https://salesrender.com/> , such as online chat on the site, the appearance of the administrative panel of the SalesRender service
- Collection of analytics about visitors to the site <https://salesrender.com/> using Yandex Metrica
- Cookies on the site <https://salesrender.com/> can be controlled in the browser cookie settings.

2.6 Special categories of personal data

The Operator's processing of special categories of personal data concerning racial, national origin, political opinions, religious or philosophical beliefs, health, intimate life is permitted in the following cases:

- the subject of personal data has given written consent to the processing of his personal data;
- personal data have been made publicly available by the subject of personal data;
- processing of personal data is conducted in strict adherence to international and applicable national laws and regulations concerning state social assistance, labor, and pension provisions. This includes, but is not limited to, compliance with universally recognized standards and guidelines for labor rights, social security benefits, and pension schemes as established by relevant international bodies and local legal frameworks in each jurisdiction. This approach ensures that the processing of personal data is carried out with due regard for the legal rights and obligations pertaining to employment, social welfare, and retirement benefits across diverse global contexts.
- processing of personal data is necessary to protect the life, health, or other vital interests of the subject of personal data or the life, health, or other vital interests of other persons and it is impossible to obtain the consent of the subject of personal data;
- processing of personal data is carried out for medical and preventive purposes, for the establishment of a medical diagnosis, the provision of medical and medical-social services

provided that the processing of personal data is carried out by a person professionally engaged in medical activities and obliged in accordance with the legislation of the Russian Federation to maintain medical secrecy;

- processing of personal data is necessary for the establishment or exercise of the rights of the subject of personal data or third parties, as well as in connection with the administration of justice;
- processing of personal data is carried out in accordance with the legislation on compulsory types of insurance, with insurance legislation.

Processing of special categories of personal data must be immediately terminated if the reasons for their processing are eliminated, unless otherwise established by federal law.

Processing of personal data on criminal convictions may be carried out by the Operator exclusively in cases and in the manner determined in accordance with federal laws.

2.7 Biometric personal data

Information characterizing the physiological and biological characteristics of a person, on the basis of which his identity can be established - biometric personal data - can be processed by the Operator only with the written consent of the subject.

2.8 Entrusting the processing of personal data to another person

The Operator reserves the right to delegate the processing of personal data to a third party, subject to the consent of the personal data subject, unless prohibited by applicable laws and regulations. This delegation is to be formalized through a contractual agreement with the third party. The appointed party is required to adhere to internationally recognized principles and rules of personal data processing, including but not limited to those outlined in the General Data Protection Regulation (GDPR) and other relevant global data protection frameworks. These principles ensure the confidentiality, integrity, and proper handling of personal data in line with global best practices and legal standards.

2.9 Cross-border Personal Data Transfer

The operator must ensure that the foreign state to which personal data is to be transferred provides adequate protection of the rights of personal data subjects before beginning such transfer. Cross-border transfer of personal data to the territories of foreign states that do not provide adequate protection of the rights of personal data subjects may be carried out in cases of:

- The presence of written consent from the personal data subject for the cross-border transfer of their personal data;

- Execution of a contract of which the personal data subject is a party.

3. RIGHTS OF THE PERSONAL DATA SUBJECT

3.1 Consent of the Personal Data Subject for the Processing of Their Personal Data

The personal data subject voluntarily decides to provide their personal data and grants consent for its processing, exercising their free will and acting in their own interest. Consent for the processing of personal data may be given by the personal data subject or their authorized representative in any form that adequately documents its receipt, in compliance with applicable international data protection laws and standards. The responsibility to provide evidence of the personal data subject's consent for the processing of their data, or proof of the existence of lawful grounds for such processing as defined by relevant international and national data protection regulations, rests with the operator.

3.2 Rights of the Personal Data Subject

The personal data subject has the right to obtain information from the operator regarding the processing of their personal data, if such right is not limited according to federal laws. The personal data subject has the right to demand the operator to clarify their personal data, block or destroy it if the personal data is incomplete, outdated,

inaccurate, illegally obtained, or not necessary for the declared processing purpose, as well as take legally provided measures to protect their rights.

Processing of personal data for the purpose of marketing goods, works, services in the market by making direct contacts with a potential consumer using communication means, as well as for political agitation, is allowed only with the prior consent of the personal data subject. Such processing of personal data is considered to be carried out without the prior consent of the personal data subject if the Company cannot prove that such consent was obtained.

The operator is obliged to immediately stop processing the personal data subject's personal data for the above purposes upon their request.

Decisions based solely on automated processing of personal data that produce legal consequences concerning the personal data subject or otherwise affect their rights and legitimate interests are prohibited, except in cases provided by federal laws, or with written consent of the personal data subject.

If the personal data subject believes that the operator is processing their personal data in violations or otherwise infringes their rights and freedoms, the personal data subject has the right to appeal the

actions or inaction of the operator to the Authorized Body for the Protection of Personal Data Subjects' Rights or in court.

The personal data subject has the right to protect their rights and legitimate interests, including compensation for damages and/or compensation for moral harm in court.

4. ENSURING THE SECURITY OF PERSONAL DATA

The security of personal data processed by the operator is ensured by implementing legal, organizational, and technical measures necessary to meet the requirements of federal legislation in the field of personal data protection.

To prevent unauthorized access to personal data, the operator applies the following organizational and technical measures:

- Appointment of officials responsible for organizing the processing and protection of personal data;
- Limiting the composition of persons having access to personal data;
- Acquainting subjects with the requirements of federal legislation and regulatory documents of the operator on the processing and protection of personal data;
- Organizing the accounting, storage, and circulation of information carriers;
- Identifying threats to the security of personal data during processing, forming threat models based on them;

- Developing a personal data protection system based on the threat model;
- Checking the readiness and effectiveness of using information protection tools;
- Differentiating user access to information resources and hardware and software means of information processing;
- Registering and accounting for user actions in personal data information systems;
- Using antivirus tools and means of restoring the personal data protection system;
- Applying, when necessary, means of network segmentation, intrusion detection, security analysis, and cryptographic protection of information;
- Organizing access control to the operator's territory, guarding premises with technical means of processing personal data.

5. FINAL PROVISIONS

Other rights and obligations of the operator as an operator of personal data are determined by the legislation of the Russian Federation in the field of personal data.

Officials of the operator who violate the norms regulating the processing and protection of personal data bear material, disciplinary, administrative, civil-legal, or criminal responsibility in the manner established by federal laws.

