

APPROVED

by Order of Director General of
BLS CUSTOS GROUP, LLC
No. 46 dated 30 August 2022

POLICY
on personal data processing
BLS CUSTOS GROUP

Version 1

(entered into force on 01 September 2022)

Moscow

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1. General Provisions

- 1.1. This Policy on personal data processing (hereinafter - Policy) is developed on the basis of Federal Law No. 152-FZ "On Personal Data" dated 27 July 2006 (hereinafter - Law) and defines the policy of BLS CUSTOS GROUP, LLC, OGRN (Primary State Registration Number) 1127746431350, address: 125319, Moscow, 16 Chernyakhovskogo St., (hereinafter - Company) in respect of personal data processing, which is collected through the site <https://blscustos.com> and its subdomains (hereinafter - Site).
- 1.2. This Policy applies to personal data that relates to an individual using the Site (hereinafter, the User).
- 1.3. The purpose of the Policy is to protect the rights and freedoms of the User in the collection and processing of their personal data, including the protection of rights to privacy, personal and family secrets, clear and strict compliance with Russian legislation in the field of personal data.
- 1.4. The Policy applies to personal data of Users processed by the Company with and without the use of automation tools.
- 1.5. The Policy is published in the public domain on the Company's Site.
- 1.6. The Company may amend this Policy as necessary.
- 1.7. The Policy is governed by and subject to interpretation under Russian law.

2. Terms used in the Policy

Personal data - any information relating directly or indirectly to a specific or identifiable individual - the subject of personal data. An individual who is a user of the Company's website is the subject of personal data;

Special categories of personal data - data relating to race, national origin, political views, religious or philosophical beliefs, health and intimate life;

Biometric personal data - information that characterizes the physiological and biological characteristics of the person, on the basis of which his identity can be established, and which is used by the operator to establish the identity of the subject of personal data;

Operator of personal data - a legal entity, independently or jointly with others, organizing and / or carry out the personal data processing, as well as determining the personal data processing, the composition of personal data to be processed, the actions taken with personal data. Processing personal data of Users in connection with the use of the Site, the Company acts as an operator of personal data;

Confidentiality of personal data - mandatory for compliance with the Company or persons who have access to personal data, the requirement to prevent their distribution without the consent of the subject of personal data or other legal basis;

personal data processing - any action or set of actions performed with or without the use of automation with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification),

extraction, use, transfer (distribution, provision, access), anonymization, blocking, removal, destruction of personal data;

Automated personal data processing - personal data processing using computer hardware;

Non-automated personal data processing - personal data processing with the direct participation of a person without the aid of computer technology;

Dissemination of personal data - personal data to an indefinite number of persons;

Provision of personal data - actions aimed at disclosure of personal data to a certain person or a certain circle of people;

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

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

Depersonalization of personal data - actions that make it impossible, without the use of additional information, to determine what personal data belongs to a particular subject of personal data;

Information system of personal data - a set of personal data contained in databases of personal data and information technology and technical means ensuring its processing;

Cross-border transfer of personal data - transfer of personal data to a foreign country to a foreign authority, a foreign individual or a foreign legal entity.

3. Purposes of personal data collection and processing

The purposes of collecting and personal data processing by the Operator are:

- answering questions sent by users to the Company's e-mail or by filling out a form on the Site;
- telephone calls to the User's phone number and/or correspondence with the User at the e-mail address specified by the User;
- provision of reference information to the User;
- provision of commercial offers and consultations to the User on the services provided by the Company;
- promotion of the Company's services;
- participation of Users in events organized by the Company;
- ensuring the performance and security of the Site.

4. Categories of Users and the list of processed personal data

4.1. The Company may collect and process personal data of the following subjects of personal data through the Site:

- Users who access the Site;
- Users who have submitted an inquiry through the inquiry form located on the Site or by email.

4.2. List of personal data and information processed through the Site:

- Personal data of the User: name (surname is indicated as desired), phone number, email address, the User's question;
- Other information processed by the Company:
 - ✓ data about technical devices: IP-address, type of operating system, browser type, geographical location, date and time of visiting the Site;
 - ✓ information about visited pages of the Site;
 - ✓ information obtained as a result of the User's actions on the Site, including the following information: about the application, about the comments, feedback and questions sent.
 - ✓ Information that is collected automatically by cookies.

Cookies are small fragments of data sent by the Site and stored on the User's device. These files contain data that does not harm the User's equipment. Cookies can be used to record the User's preferences (such as the language selected and how the User uses the Site). These files help the Company improve the content of the Site and make it easier to use.

4.3. The Company has the right to use the information received to provide a response to the User's request. In particular, if the purpose of the User's request is to receive services provided by the Company, a commercial offer may be sent to the User.

4.4. The Company, as the owner of the Site, has the right to control the use of the Site, including in order to observe the rights of Users in such personal data processing.

5. Grounds for personal data processing

The Company processes personal data only if there are legal grounds for their processing, which include:

- consent of the User to the personal data processing;
- the execution of contracts entered into between the Company and the subject of personal data;
- the performance of functions, powers and duties imposed on the Company by Russian legislation and the Company's Articles of Association.

6. Principles of personal data processing through the Site

6.1. Personal data is processed on the basis of the principles of lawfulness, fairness and transparency.

6.2. The Company respects the confidentiality of personal data of Users and does not disclose it to third parties without consent or other legal basis.

6.3. Confidentiality of personal data is respected, including through the adoption of legal, organizational and technical measures to protect personal data from unauthorized or unlawful access, modification, restriction, copying, transfer, distribution, destruction and other unlawful acts in relation to personal data.

6.4. Personal data is processed for specific and predetermined purposes. Storage of personal data is not carried out after the objectives of processing, except as required by Russian legislation.

6.5. When processing personal data, we ensure the accuracy, adequacy and relevance of personal data, as well as their consistency with the purposes of processing.

6.6. The Company does not base any decisions affecting the interests of individuals on the automated personal data processing, unless the User has provided the appropriate consent.

6.7. The Company does not collect or process biometric personal data and special categories of personal data through the Site.

7. Methods and terms of personal data processing

7.1. The Company may process personal data with or without the use of automated means by collecting, recording, systematizing, accumulating, storing, specifying (updating, changing), extracting, using, transferring (providing, access), blocking, deleting, destroying.

7.2. The Company generally does not transfer personal data to third parties without the consent of the User.

Personal data may be transferred without the consent of the User in the following cases:

- in order to comply with the requirements of applicable legislation, court decisions and requests of state and municipal bodies.
- in connection with a law enforcement investigation.
- in order to investigate or assist in preventing violations of applicable law and this Policy.
- in order to protect the rights and property, as well as to ensure the safety of the Company and its employees, Website Users or other persons, as well as in other cases stipulated by applicable law.

7.3. personal data processing is limited to achieving the specific, predetermined and legitimate purposes of its processing, specified in the Policy.

7.4. Once the purposes of processing have been achieved, personal data must be destroyed within ten (10) business days. The Company shall destroy the personal data, as well as ensure its destruction by third parties involved in the processing.

7.5. personal data processing ceases when the user withdraws consent to its processing (in cases where the consent is the only legal basis for the personal data processing of the User).

7.6. The personal data processing may be continued after the withdrawal of consent by the User if it is required to fulfill the obligations of the Company arising from applicable law and / or when the processing is necessary to exercise the rights and legitimate interests of the Company and / or third parties.

8. Consent to personal data processing

- 8.1. The User decides to provide his personal data to the Company freely, of his own free will and in his own interest.
- 8.2. By using the Company's Site on the Internet, providing his personal data in the web forms on the Site, checking the box and clicking "I agree with the terms of the Policy," the User expresses his consent and gives permission for the processing of his personal data in the manner provided by the Policy.
- 8.3. Consent to the personal data processing may be revoked by the subject of personal data in the manner prescribed in section 10 of the Policy.

9. Main Rights and Obligations of the User and the Company

- 9.1. The User as a subject of personal data has the right:
- to receive information about the processing of his personal data by the Company by sending inquiries;
 - to appeal against the actions or omissions of the Company as the operator of personal data.
- 9.2. The request shall contain:
- the number of the main identity document of the User or its representative, information on the date of issue of the said document and the issuing authority;
 - information confirming the User's participation in a relationship with the Company or information confirming that the Company processes the User's personal data;
 - handwritten or electronic signature of the User or its representative. When the request is signed by a representative, a power of attorney should be attached to the request.
- 9.3. The Company as the operator of personal data is obliged:
- to provide at the request of the User information about the processing of his personal data or a reasonable refusal;
 - at the request of the user to clarify the processed personal data, block or delete if they are incomplete, outdated, inaccurate, illegally obtained or unnecessary for the stated purpose of processing;
 - to ensure the legality of the personal data processing;
 - in the case of revocation of the User's consent to the personal data processing to stop processing and destroy it within a period not exceeding 10 (ten) business days from the date of receipt of the revocation, except in cases where the processing can be continued in accordance with the law.

10. User Requests

- 10.1. To withdraw consent to the personal data processing or exercise other rights, to receive from the Company certain information or answers to questions related to this Policy or the personal data processing User may send a request to e-mail

inbox@bls-custos.com or to the Company address: 125319, Moscow, 16 Chernyakhovskogo St., Suite 1205.