

APPROVED

by Order of General Director of
BLS CUSTOS GROUP, LLC
as of May 22, 2026 No. 18

**Personal Data Processing Policy of
BLS CUSTOS GROUP**

Version 2

(entered into force on May 25, 2026)

Moscow

Table of Contents

1. General Provisions.....	3
2. Terms Used in the Policy	3
3. Categories of Personal Data Subjects, Purposes of Personal Data Collection and Processing, and Scope of Personal Data Processing.....	5
5. Legal Grounds for Personal Data Processing.....	7
6. Principles of Personal Data Processing via the Website.....	7
7. Methods and Term of Personal Data Processing	8
8. Consent to Personal Data Processing	9
9. Main Rights and Obligations of the User and the Company	10
10. User Requests.....	11

1. General Provisions

- 1.1. This Personal Data Processing Policy (hereinafter the "Policy") is developed on the basis of Federal Law No. 152-FZ dated 27 July 2006 "On Personal Data" (hereinafter the "Law") and defines the policy of BLS CUSTOS GROUP, LLC, OGRN (Primary State Registration Number) 1127746431350, address: 16 Chernyakhovskogo St., Moscow, 125319, (hereinafter the "Company") in respect of the processing of personal data collected via the website <https://blscustos.com> and its subdomains (hereinafter the "Website").
- 1.2. The purpose of this Policy is to protect the rights and freedoms of the Personal Data Subjects in the collection and processing of their personal data, including the protection of the rights to privacy, personal and family secrets, clear and strict compliance with the requirements of Russian personal data legislation.
- 1.3. This Policy applies to personal data of Data Subjects processed by the Company both with and without the use of automated means.
- 1.4. This Policy is publicly available on the Company's Website on the Internet.
- 1.5. The Company is entitled to amend this Policy as necessary.
- 1.6. This Policy shall be governed by and interpreted in accordance with Russian law.

2. Terms Used in the Policy

"Personal Data" means any information relating directly or indirectly to a specific or identifiable individual (the personal data subject);

"Special Categories of Personal Data" means data relating to race, national origin, political views, religious or philosophical beliefs, health condition, and intimate life;

"Biometric Personal Data" means information relating to a person's physiological and biological characteristics that can be used to identify that person and which are used by the personal data controller to establish the identity of the personal data subject;

"Personal Data Controller" means a legal entity that, independently or jointly with others, organizes and/or carries out the personal data processing, as well as determines the purposes of personal data processing, the composition of personal data to be processed, and the actions taken in

relation to such personal data. In processing the personal data of Data Subjects in connection with the use of the Website, the Company acts as the personal data controller;

"Confidentiality of Personal Data" means the obligation of the Company or persons who have obtained access to personal data to prevent the disclosure or dissemination of such data without the consent of the personal data subject or other lawful grounds permitting such disclosure or dissemination;

"Personal Data Processing" means any action or set of actions performed on personal data, with or without the use of automation means, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (dissemination, provision, access), depersonalization, blocking, removal, and destruction of personal data;

"Automated Personal Data Processing" means the personal data processing using computer equipment;

"Non-Automated Personal Data Processing" means the personal data processing with the direct participation of a person, without the use of computer equipment;

"Dissemination of Personal Data" means actions aimed at disclosing personal data to an indefinite group of persons;

"Provision of Personal Data" means actions aimed at disclosing personal data to a certain person or a certain group of persons;

"Blocking of Personal Data" means the temporary termination of the personal data processing (except where such processing is necessary to clarify personal data);

"Destruction of Personal Data" means actions resulting in the impossibility of restoring the content of personal data in an information system of personal data and (or) resulting in the destruction of material media containing personal data;

"Information System of Personal Data" means a set of personal data contained in databases of personal data, as well as the information technologies and technical means ensuring the processing of such personal data;

"Cookies" means small pieces of data sent by the Website and stored on the User's device. These files contain data that do not harm the User's

equipment. They may be used to record the User's preferences (such as the selected language and information about how the User uses the Website). These files help the Company improve the Website's content and facilitate its use.

3. Categories of Personal Data Subjects, Purposes of Personal Data Collection and Processing, and Scope of Personal Data Processing

3.1. The Company may collect personal data of the following personal data subjects via the Website:

- Users who access the Website;
- Users who submit inquiries via the request form available on the Website or by email.

3.2. The Company is entitled to use the information received in order to respond 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.

3.3. The Company, as the owner of the Website, when processing personal data, is entitled to control the use of the Website, including in order to ensure compliance with the rights of Users in such personal data processing.

3.4. The Company processes the personal data of Data Subjects on the Website for the following purposes:

No.	Purposes of Processing	Scope and Categories of Personal Data	Personal Data Subjects
1.	Responding to requests submitted by Users via the Company's email address or via the Website web forms, including telephone communications via the provided phone number and/or correspondence with the User via the email address provided by the User	Name, phone number, email address, place of employment	Users

2.	Providing reference information to the User	Name, phone number, email address, place of employment	Users
3.	Providing Users with commercial offers regarding services provided by the Company	Name, phone number, email address, place of employment	Users
4.	Promotion of the Company's services	Surname, first name, position, photographs, specimen signature of Company employees. Surname, first name, patronymic, position, photographs of Clients' representatives.	Company employees, Clients' representatives
5.	Maintaining the Company's Website in an up-to-date condition	Surname, first name, position, photographs, specimen signature of Company employees. Surname, first name, patronymic, position, photographs of Clients' representatives.	Company employees, Clients' representatives

3.5. A detailed list of personal data processed by the Company is contained in the Regulation on the Processing and Protection of Personal Data, which is approved by an order of the Company's General Director.

4. Use of Cookies

4.1. The Website automatically collects information through the use of cookies, including:

- IP address and type of operating system;
- information about the selected language;
- information obtained as a result of the User's activities on the Website, including details of inquiries submitted by the User.

4.2. The purposes of using the collected information are as follows:

- to retain information about the User for the duration of their use of the Website;
- to enable the functioning of certain sections/pages of the Website;

- to improve Website navigation;
- to enhance interaction between the Website and Users;
- to improve the quality of services and ensure maximum convenience and comfort for Users when using the Website.

4.3. Types of cookies used:

- Technical cookies, which are necessary for the uninterrupted and reliable operation of the Website. Disabling such cookies may result in restricted access to certain functionalities of the Website.
- Persistent cookies, which remain stored on the User's device for a certain period and are responsible for the User's personal preferences configured in the browser (including the Website language settings).

4.4. The User may delete cookies stored on their device by changing the settings of the browser they use.

4.5. The User should be aware that blocking or deleting cookies may affect the browsing of the Website and may result in certain functions of the Website not operating properly.

5. Legal Grounds for Personal Data Processing

5.1. The Company processes personal data only where legal grounds for such processing exist, including:

- the consent of the User to the personal data processing;
- the preparation, execution, and performance of contracts entered into between the Company and the personal data subject;
- the performance of functions, powers, and obligations imposed on the Company by Russian legislation and the Company's Articles of Association;
- the processing of personal data being necessary for the exercise of the Company's or third parties' rights and legitimate interests.

6. Principles of Personal Data Processing via the Website

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

6.2. The Company maintains the confidentiality of Users' personal data and does not disclose such data to third parties without the appropriate consent or other lawful basis.

6.3. The confidentiality of personal data is respected, including through the adoption of legal, organizational, and technical measures aimed at protecting personal data against unauthorized or unlawful access, modification, restriction, copying, transfer, dissemination, destruction, and other unlawful actions in relation to personal data in accordance with the requirements of the Federal Law No. 152-FZ dated 27 July 2006 "On Personal Data".

6.4. Personal data shall be processed for specific and predetermined purposes. The processing of personal data in a manner incompatible with the purposes for which such personal data was collected is not permitted. Only personal data that is relevant to the purposes of its processing shall be processed. Personal data shall not be retained once the purposes of processing have been fulfilled, except where otherwise is required by the legislation of the Russian Federation.

6.5. When processing personal data, the Company ensures the accuracy, adequacy, and relevance of personal data, as well as its compliance with the purposes of processing.

6.6. When making any decisions affecting the interests of individuals, the Company does not rely solely on automated processing of personal data, except where the User has provided the relevant consent.

6.7. The Company does not collect or process biometric personal data or special categories of personal data via the Website.

7. Methods and Term of Personal Data Processing

7.1. The Company may process personal data with or without the use of automation means, as well as through mixed processing methods, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (dissemination, provision, access), blocking, removal, and destruction.

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

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

- in order to comply with the requirements of applicable law, court decisions and requests of state and municipal authorities.

- in connection with investigations conducted by law enforcement agencies.
- in order to investigate or assist in preventing violations of applicable law and this Policy.
- in order to protect the rights and property, and to ensure the security of the Company and its employees, Website Users or other persons, as well as in other cases provided for by applicable law.

7.3. Personal data processing is limited to achievement of the specific, pre-defined and lawful purposes of processing, as specified in the Policy.

7.4. Upon achievement of the purposes of processing, personal data shall be destroyed within thirty (30) business days. The Company shall destroy the personal data, as well as ensure its destruction by third parties engaged in the processing.

7.5. Personal data processing shall cease 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 continue after the User withdraws its consent if it is required to fulfill the obligations of the Company arising under 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 the Company with their personal data of their own free will, and in their own interest.

8.2. By using the Company's Website on the Internet, providing their personal data in the web forms on the Website, checking the box and clicking "I consent to Personal Data Processing" button, the User gives their consent and grant permission for the processing of their personal data in accordance with the terms of consent and in the manner provided for by the Policy.

8.3. Consent to the personal data processing may be revoked by the personal data subject in accordance with the procedure provided for in Section 10 of the Policy.

8.4. Photographs and other personal data of Data Subjects are published on the Website pursuant to written consents obtained in accordance with applicable law. Such personal data must not be copied, disseminated, or otherwise processed.

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

9.1. The User as a personal data subject has the right to:

- receive information about the Company's processing of their personal data by submitting inquiries;
- request that the Company clarify, block, or destroy their personal data if such data is incomplete, outdated or inaccurate;
- appeal against the actions or omissions of the Company as the personal data controller.

9.2. The request shall include:

- 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;
- the handwritten or electronic signature of the User or its representative. When the request is signed by a representative, a power of attorney shall be attached to the request.

9.3. The Company as the personal data controller is obliged to:

- provide at the request of the User information regarding the processing of their personal data or a reasonable refusal;
- at the request of the User to clarify the processed personal data, block or destroy if they are incomplete, outdated, inaccurate, illegally obtained or unnecessary for the stated purpose of processing;
- ensure the lawful processing of personal data;
- in the case of revocation of the User's consent to the personal data processing to cease such processing and destroy it within a period not exceeding ten (10) business days from the date of receipt of such revocation, except where the processing may continue in accordance with the law.
- when personal data processing, the controller is obliged to take the necessary legal, organizational and technical measures, or ensure that such measures are taken, to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unlawful actions in relation to personal data;

10. User Requests

10.1. To withdraw consent to the personal data processing or to exercise other rights, to receive from the Company certain information or answers to questions relating to this Policy or the personal data processing, the User may send a request to e-mail inbox@bls-custos.com or to the Company's registered address: 16 Chernyakhovskogo St., Suite 1205, Moscow, 125319