

1. General Provisions

This Personal Data Processing Policy has been made in accordance with the requirements of Federal Law No. 152-FZ *On Personal Data* dated July 27, 2006 (hereinafter, the Law on Personal Data), and determines the procedure for personal data processing and measures to ensure the personal data security accepted by AMC LLC (hereinafter, the Operator).

1.1. The Operator sets its most important goal and condition for carrying out its activities to respect the rights and liberties of an individual and a citizen when processing his/her personal data, including the protection of the rights to personal and family privacy.

1.2. This Operator's Policy in respect of the personal data processing (hereinafter, the Policy) shall apply to all information that the Operator may receive about the visitors of website <https://asiamc.ru>.

2. General Definitions Used in the Policy

2.1. Automated Processing of Personal Data means the personal data processing by means of computer technology.

2.2. Blocking of Personal Data means the temporary suspension of the personal data processing (except where the processing is necessary to clarify the personal data).

2.3. Website means a set of graphic and informational materials, as well as computer programs and databases that ensure their availability on the Internet at the network address: <https://asiamc.ru>.

2.4. Personal Data Information System means a set of personal data contained in the databases, and the information technologies and technical means that ensure their processing.

2.5. Depersonalization of Personal Data means actions as a result of which it is impossible to determine the ownership of personal data by a specific User or other personal data subject without the use of additional information.

2.6. Personal Data Processing means any action (operation) or a set of actions (operations) performed in respect of personal data with or without the use of automation technology, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.7. Operator means the state authority, municipal authority, legal entity or individual organizing and/or carrying out the personal data processing independently or jointly with other persons, as well as determining the purposes of personal data processing, the composition of personal data to be processed, the actions (operations) in respect of personal data.

2.8. Personal Data mean any information relating directly or indirectly to a specific or identifiable User of website <https://asiamc.ru>.

2.9. Personal Data Permitted by the Personal Data Subject for Distribution mean personal data, the access to which for members of the general public is provided by the personal data subject by giving his/her consent to the processing of personal data permitted by the personal data subject for distribution in the manner prescribed by the Law on Personal Data (hereinafter, the Personal Data Permitted for Distribution).

2.10. User means any visitor to website <https://asiamc.ru>.

2.11. Provision of Personal Data means any actions aimed at disclosing the personal data to a certain person or a certain group of persons.

2.12. Distribution of Personal Data means any actions aimed at disclosing the personal data to members of the general public (transfer of personal data) or reviewing the personal data by

members of the general public, including the public disclosure of personal data in the mass media, placement in information and telecommunication networks or provision of access to the personal data in any different way.

2.13. International Transfer of Personal Data means the transfer of personal data to the territory of a foreign country to the competent authority of a foreign country, a foreign individual or a foreign legal entity.

2.14. Destruction of Personal Data means any actions as a result of which the personal data are destroyed irretrievably with the impossibility of further restoration of the personal data content in the personal data information system and/or the material media bearing the personal data are destroyed.

3. Primary Rights and Obligations of the Operator

3.1. The Operator shall be entitled:

- to receive reliable information and/or documents containing the personal data from the personal data subject,
- in the event that the personal data subject withdraws his/her consent to the personal data processing, the Operator may continue the personal data processing without the consent of the personal data subject if there are any grounds specified in the Law on Personal Data,
- to independently determine the composition and list of measures necessary and sufficient to ensure the performance of obligations provided for by the Law on Personal Data and the regulations accepted in accordance therewith, unless otherwise provided for by the Law on Personal Data or other Federal Laws.

3.2. The Operator shall be obliged:

- to provide the personal data subject, upon his/her request, with information regarding the processing of his/her personal data,
- to organize the personal data processing in the manner prescribed by the applicable laws of the Russian Federation,
- to respond to applications and requests from the personal data subjects and their legal representatives in accordance with the requirements of the Law on Personal Data,
- to provide the competent authority for the protection of the rights of personal data subjects, upon request of such authority, with the necessary information within 30 days from the date of receiving such request,
- to publish or otherwise provide the unrestricted access to this Policy regarding the personal data processing,
- to take legal, organizational and technical measures to protect the personal data from unauthorized or accidental access thereto, destruction, change, blocking, copying, provision, distribution of the personal data, as well as from other illegal actions in respect of the personal data,
- to stop the transfer (distribution, provision, access) of the personal data, stop the processing and destroy the personal data in the manner and in the events provided for by the Law on Personal Data,
- to perform other duties provided for by the Law on Personal Data.

4. Primary Rights and Obligations of Personal Data Subjects

4.1. The personal data subjects shall be entitled:

- to receive information regarding the processing of their personal data, except as otherwise provided by the Federal Laws. The information shall be provided to the personal data subject by the Operator in an intelligible form, and it shall not contain any personal data related to other personal data subjects, except where there are legal grounds for disclosing such personal data. The list of information and the procedure for its receiving is stipulated by the Law on Personal

Data,

- to require the Operator to clarify their personal data, block or destroy them if the personal data are incomplete, outdated, inaccurate, illegally received or not required for the stated purpose of processing, as well as to take legal measures to protect their rights,
- to set forth the condition of prior consent when processing the personal data to promote goods, work and services on the market,
- to withdraw their consent to the personal data processing,
- to appeal through the competent authority for the protection of the rights of personal data subjects or through the courts against illegal actions or omissions of the Operator when processing their personal data,
- to exercise other rights provided for by the laws of the Russian Federation.

4.2. The personal data subjects shall be obliged:

- to provide the Operator with reliable data about themselves,
- to inform the Operator about the clarification (update, change) of their personal data.

4.3. Any persons that have provided the Operator with false information about themselves or information about another personal data subject without his/her consent, shall be liable in accordance with the laws of the Russian Federation.

5. Operator May Process the Following Personal Data of the User

5.1. Surname, name, patronymic.

5.2. E-mail address.

5.3. Telephone numbers.

5.4. The website also collects and processes anonymous data about the visitors (including cookies) using the Internet statistic services (Yandex Metrika and Google Analytics, and others).

5.5. The above data are hereinafter united by the general term of Personal Data.

5.6. The processing of special categories of personal data relating to race origin, national identity, political views, religious or philosophical beliefs, intimate life shall not be carried out by the Operator.

5.7. The processing of personal data permitted for distribution from among the special categories of personal data specified in Part 1 of Art. 10 of the Law on Personal Data shall be allowed if the prohibitions and conditions provided for in Art. 10.1 of the Personal Data Law are observed.

5.8. The User's consent to the processing of personal data permitted for distribution shall be executed separately from other consents to the processing of his/her personal data. At the same time, the terms and conditions provided for, in particular, by Art. 10.1 of the Law on Personal Data shall be observed. The requirements for the content of such consent shall be determined by the competent authority for the protection of the rights of personal data subjects.

5.8.1. The User shall provide the Operator directly with the consent to the processing of personal data permitted for distribution.

5.8.2. The Operator shall be obliged, no later than three business days from the date of receiving the specified User's consent, to publish the information on the conditions for processing, on the existence of any prohibitions and conditions for the processing of personal data permitted for distribution by members of the general public.

5.8.3. The transfer (distribution, provision, access) of personal data permitted for distribution by the personal data subject shall be stopped at any time upon request of the personal data subject. Such request shall include the surname, name, patronymic (if any), contact information (telephone number, e-mail address or postal address) of the personal data subject, as well as a list of personal data, the processing of which is subject to discontinuation. The personal data

specified in such request may be processed only by the Operator, to whom it was sent.

5.8.4. The consent to the processing of personal data permitted for distribution shall terminate from the time of receipt by the Operator of the request specified in Clause 5.8.3. of this Policy regarding the personal data processing.

6. Principles of Personal Data Processing

6.1. The personal data processing shall be carried out on a legal and equitable basis.

6.2. The personal data processing shall be limited to the achievement of specific, predetermined and legitimate purposes. The personal data processing that is incompatible with the purposes of personal data collection is not allowed.

6.3. The integration of databases containing the personal data, the processing of which is carried out for any purposes incompatible with each other, is not allowed.

6.4. Only personal data that meet the purposes of their processing are subject to processing.

6.5. The content and amount of the processed personal data shall correspond to the stated purposes of processing. The redundancy of the processed personal data in relation to the stated purposes of their processing is not allowed.

6.6. When processing the personal data, the accuracy of personal data, their sufficiency, and their relevance, if necessary, in relation to the purposes of the personal data processing, shall be ensured. The Operator shall take necessary measures and/or ensure their taking to delete or clarify any incomplete or inaccurate data.

6.7. The storage of personal data shall be carried out in a form that allows to identify the personal data subject no longer than required by the purposes of the personal data processing, if the personal data storage period is not stipulated by the Federal Law, a contract, to which the personal data subject is a party, beneficiary or guarantor. The processed personal data shall be destroyed or depersonalized upon achieving the purposes of processing or if there is no further need to achieve such purposes, unless otherwise provided by the Federal Law.

7. Purposes of Personal Data Processing

7.1. The purpose of processing the User's personal data:

- to inform the User by sending e-mails,
- to enter into, perform and terminate any civil contracts,
- to provide the User with access to the services, information and/or materials contained on website <https://asiamc.ru>.

7.2. The Operator also shall be entitled to send notices to the User about new products and services, special offers and various events. The User may always refuse to receive informational messages by sending an e-mail to the Operator to: info@asiamc.ru, with the note of "Refusal of notices about new products and services and special offers".

7.3. The anonymized data of the Users collected using the Internet statistic services shall be used to collect information about the Users' actions on the website, improve the quality of the website and its content.

8. Legal Grounds for Personal Data Processing

8.1. The legal grounds for the personal data processing by the Operator are the following:

- the Constitution of the Russian Federation and International Treaties of the Russian Federation, Federal Law No. 152-FZ *On Personal Data* dated July 27, 2006, other Federal Laws determining the cases and features of the personal data processing,
- other regulations in personal data protection,
- the Users' consents to the processing of their personal data, to the processing of personal data

permitted for distribution.

8.2. The Operator shall process the User's personal data only if they are completed and/or sent by the User independently through special forms placed on website <https://asiamc.ru> or sent to the Operator via e-mail. By completing the relevant forms and/or sending his/her personal data to the Operator, the User approves his/her consent to this Policy.

8.3. The Operator shall process any anonymized data about the User if it is allowed in the User's browser settings (cookie saving and JavaScript technology using are enabled).

8.4. The personal data subject shall independently decide on the provision of his/her personal data and give his/her consent freely, of his/her own free will and in his/her own interest.

9. Conditions for Personal Data Processing

9.1. The personal data processing shall be carried out with the consent of the personal data subject to the processing of his/her personal data.

9.2. The personal data processing is necessary to achieve the purposes provided for by the International Treaty of the Russian Federation or the Law, to carry out the functions, powers and obligations assigned to the Operator by the laws of the Russian Federation.

9.3. The personal data processing is necessary for the administration of justice, the performance of a court order, an order of another authority or official subject to performance in accordance with the laws of the Russian Federation on enforcement proceedings.

9.4. The personal data processing is necessary for the performance of a contract, to which the personal data subject is a party or beneficiary or guarantor, as well as for entering into a contract on the initiative of the personal data subject or a contract, under which the personal data subject is to be the beneficiary or guarantor.

9.5. The personal data processing is necessary to exercise the rights and legitimate interests of the Operator or any third parties or to achieve the publicly significant goals, provided that the rights and liberties of the personal data subject are not violated.

9.6. The processing shall be carried out in respect of personal data, the access to which for members of the general public is provided by the personal data subject or at his/her request (hereinafter, the Publicly Available Personal Data).

9.7. The processing shall be carried out in respect of personal data subject to publication or mandatory disclosure in accordance with the Federal Law.

10. Procedure for Collection, Storage, Transfer of Personal Data and Other Types of Their Processing

The security of personal data processed by the Operator shall be ensured through the implementation of legal, organizational and technical measures necessary to fully comply with the requirements of the applicable laws in personal data protection.

10.1. The Operator shall ensure the safety of personal data and take all possible measures to exclude any access to the personal data by unauthorized persons.

10.2. The User's personal data shall never, under no circumstances, be transferred to third parties, except in cases related to the performance of the applicable laws or if the personal data subject has given his/her consent to the Operator to transfer the data to a third party for the performance of obligations under a civil contract.

10.3. If any inaccuracies in the personal data are revealed, the User may update them independently by sending a notice to the Operator to the Operator's e-mail address: info@asiamc.ru, marked with "Personal Data Updating".

10.4. The duration of the personal data processing shall be determined by the achievement of

purposes, for which the personal data were collected, unless a different duration period is provided by the contract or applicable laws.

The User may withdraw his/her consent to the personal data processing at any time by sending a notice to the Operator via e-mail to the Operator's e-mail address: info@asiamc.ru, marked with "Withdrawal of Consent to Personal Data Processing".

10.5. All information that is collected by third-party services, including payment systems, means of communication and other service providers, shall be stored and processed by the specified persons (Operators) in accordance with their User Agreement and Privacy Policy. The personal data subject and/or the User shall be obliged to independently become acquainted with the specified documents in a timely manner. The Operator shall not be liable for any actions of third parties, including the service providers specified in this Clause.

10.6. The prohibitions determined by the personal data subject on the transfer (except for access provision), as well as on the processing or the conditions for processing (except for access obtaining) of personal data permitted for distribution, shall not apply in cases of personal data processing in the state, public and other public interests determined by the laws of the Russian Federation.

10.7. When processing the personal data, the Operator shall ensure the confidentiality of personal data.

10.8. The Operator shall carry out the storage of personal data in a form that allows to identify the personal data subject no longer than required by the purposes of the personal data processing, if the personal data storage period is not stipulated by the Federal Law, a contract, to which the personal data subject is a party, beneficiary or guarantor.

10.9. The condition for discontinuation of the personal data processing may be the achievement of the purposes of personal data processing, the expiration of the consent of the personal data subject or the withdrawal of the consent by the personal data subject, as well as the identification of any unlawful personal data processing.

11. List of Actions Performed by the Operator with the Personal Data Received

11.1. The Operator shall carry out the collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion and destruction of the personal data.

11.2. The Operator shall carry out the automated processing of personal data with or without the receipt and/or transfer of the received information via the information and telecommunication networks.

12. International Transfer of Personal Data

12.1. Prior to the start of the international transfer of personal data, the Operator shall be obliged to make sure that the foreign country, to the territory of which the transfer of personal data is supposed to be carried out, ensures the reliable protection of the rights of the personal data subjects.

12.2. The international transfer of personal data to the territory of foreign countries that do not meet the above requirements may be carried out only if there is a written consent of the personal data subject to the international transfer of his/her personal data and/or in the event of the performance of a contract, to which the personal data subject is a party.

13. Confidentiality of Personal Data

The Operator and other persons that have obtained the access to personal data shall be obliged not to disclose to any third parties and not to distribute the personal data without the consent of the personal data subject, unless otherwise provided by the Federal Law.

14. Final Provisions

14.1. The User may receive any clarifications on issues of interest regarding the processing of his/her personal data by contacting the Operator via e-mail: info@asiamc.ru.

14.2. This document shall reflect any changes in the Personal Data Processing Policy made by the Operator. The Policy shall be valid for an unlimited period until it is replaced by a new version.

14.3. The updated version of the Policy freely available shall be placed on the Internet.