

## **PRIVACY POLICY**

of Limited Liability Company "RE Trading"

(Approved by Order No. RT/2023/138 dated 06 April 2023 by CEO A.A. Pilyugina)

This Privacy Policy of Limited Liability Company "RE Trading", Primary State Registration Number (OGRN) 1127747192540, registered office: 4 Shlyuzovaya Embankment, Moscow, 115114, Russian Federation (hereinafter referred to as the "Company"), regarding the processing of personal data (hereinafter referred to as the "Policy"), is a local regulatory document that defines the main principles, purposes, conditions, and methods of processing personal data, lists of data subjects and processed personal data, the Company's functions in processing personal data, the rights of data subjects, as well as the implemented data protection requirements. The purpose of this Policy is to protect the rights of personal data subjects during processing, including the right to privacy, personal and family confidentiality, and to ensure the security of personal data.

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### **1. Scope and Applicability**

- The Policy applies to all personal data and operations performed on it within the Company, both with and without the use of automation tools.
  - This Policy is mandatory for all managers and employees of the Company and its structural divisions with access to personal data.
  - In accordance with Part 2 of Article 18.1 of the Federal Law on Personal Data, this Policy is published publicly on the Internet on the Company's website.
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### **2. Legal Basis for Processing**

The Company processes and ensures the security of personal data in accordance with:

- The Constitution of the Russian Federation;
  - Federal Law No. 152-FZ dated 27 July 2006 "On Personal Data";
  - The Labour Code, Tax Code, and other laws, including but not limited to:
    - Federal Law No. 54-FZ of 22.05.2003 "On the Use of Cash Register Equipment";
    - Federal Law No. 14-FZ of 08.02.1998 "On Limited Liability Companies";
    - Federal Law No. 402-FZ of 06.12.2011 "On Accounting";
    - Federal Law No. 167-FZ of 15.12.2001 "On Compulsory Pension Insurance";
  - Presidential Decree No. 188 of 06.03.1997 "On Approval of the List of Confidential Information";
  - Bank of Russia Directive No. 3210-U of 11.03.2014;
  - Employment contracts, civil contracts, and personal data subjects' consents.
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### **3. Key Definitions**

- **Personal data** – any information related directly or indirectly to an identified or identifiable individual (data subject).
  - **Biometric data** – data characterizing a person's physiological traits allowing identity verification.
  - **Processing of personal data** – any action or combination of actions involving personal data, including collection, recording, systematization, storage, modification, extraction, use, transfer, depersonalization, blocking, deletion, and destruction.
  - **Operator** – RE Trading LLC.
  - **Data subject** – a natural person to whom the personal data relates.
  - **Confidentiality** – obligation of the Operator to not disclose personal data without consent of the data subject.
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## 4. Purpose of Processing

Personal data processing is limited to specific, predetermined, lawful purposes, including:

- Business operations as per Russian law and the Company's Charter;
  - Compliance with labor legislation, including:
    - Assistance to job applicants,
    - Selection and recruitment,
    - Internal personnel management,
    - Record-keeping, payroll, benefits, pension insurance, security, access control.
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## 5. Categories of Data Subjects and Data Types

Data subjects include:

- Employees, ex-employees, and their family members;
- Job applicants and candidates;
- Customers (in-store and online) and individuals requesting refunds;
- Buyers providing email addresses for e-receipts;
- Individual contractors and representatives of legal entity contractors;
- Participants in marketing activities.

## 6. Data Subjects and Scope of Personal Data

The Company may process personal data of the following categories of individuals:

### 6.1. Applicants and Candidates for Employment

For the purpose of compliance with labor legislation and related procedures, including access control:

- Full name (last name, first name, patronymic);
- Gender;

- Citizenship;
- Date and place of birth;
- Contact details: email address, phone number;
- Education, work experience, qualifications;
- Other personal data voluntarily submitted in CVs and cover letters.

## 6.2. Employees and Former Employees

For the purpose of HR administration, payroll, legal compliance, record-keeping, tax reporting, military record maintenance, issuance of salary cards, provision of corporate mobile services, creation of user accounts, and preparation of workplaces including access control:

- Full name; gender; citizenship;
- Date and place of birth;
- Photograph;
- Passport details;
- Registered and actual addresses;
- Contact information;
- Taxpayer Identification Number (INN);
- Insurance Number of Individual Ledger Account (SNILS);
- Information on education, qualifications, training;
- Marital status, children, family relations;
- Employment history, including awards or disciplinary actions;
- Military service data;
- Disability status; alimony deductions;
- Income from previous employment;
- Other data as required by labor law.

Biometric data (photograph) is used solely for the production of access badges and identity verification for single or multiple entries into secured office areas.

Employee data is retained no longer than necessary for the stated purposes and is subject to destruction upon reaching the processing goal or no longer being needed, in accordance with archival legislation of the Russian Federation.

## 6.3. Family Members of Employees

For compliance with labor law:

- Full name;
- Degree of kinship;
- Year of birth;
- Other data provided in accordance with labor law requirements.

## 6.4. Buyers and Individuals Requesting Returns or Exchanges

- Buyers in physical stores:  
With consent, data collected includes full name, phone number, and/or email for the

purpose of sending digital receipts as required by Federal Law No. 54-FZ. Data is entered into paper questionnaires, stored in locked cabinets for 1 year, then archived for 5 years and destroyed afterward. Electronic data is transmitted to the Operator of Fiscal Data (OFD).

- Return/exchange clients:

Data includes full name, passport details, address, and bank details (as required).

This data verifies that the refund is issued to the correct person. No passport copies are taken. Information is verified, then archived for 5 years and destroyed thereafter.

#### 6.5. Online Store Customers

Phone conversations may be recorded (with prior notice). Recordings are retained for up to 1 year in Mango Office and used for quality control and claims resolution. Data required for order processing and delivery is collected with customer consent and destroyed upon purpose fulfillment.

#### 6.6. Video Surveillance in Retail Stores

If signage indicates "Video Surveillance in Progress", footage may be recorded to prevent unlawful actions and shared with police upon official request. Storage period: up to 1 month.

#### 6.7. Clients and Contractors (Individuals)

For the Company's statutory activities and access control:

- Full name, date/place of birth, passport details;
  - Residential address, contact details;
  - Tax ID number, bank account number;
  - Other necessary contractual data.
- Stored for contract duration plus 25 years in legal archives.

#### 6.8. Representatives of Clients and Contractors (Legal Entities)

- Full name, passport data, contact info;
  - Position;
  - Other contract-related personal data.
- Stored as above.

#### 6.9. Company Founders and Executives

- Full name, passport data, position;
- Stored for the Company's entire lifespan in its archives.

#### 6.10. Participants in Marketing Activities

To promote products, increase sales and brand recognition, the Company processes:

- Full name;
- Email address;
- Phone number;

- Social media/messenger usernames.  
Data is stored in physical or digital form and destroyed after the activity ends, unless extended by separate consent.

## 7. Procedure and Conditions for Personal Data Processing

- **Actions** performed with personal data include: collection, receipt, recording, systematization, accumulation, storage, updating (modification), retrieval, usage, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction.
- **Methods:** automated (with computing tools) and non-automated (manual).
- **Processing period:** from the moment the data is received until the occurrence of one of the following:
  - Fulfillment of the processing purpose;
  - Expiry or withdrawal of consent;
  - Detection of unlawful processing;
  - Termination of the Company's operations;
  - Expiry of terms set by this Policy.

The Company may delegate processing to third parties under a written agreement, ensuring:

- Compliance with the Federal Law No. 152-FZ "On Personal Data";
- Defined scope of data actions, purposes, confidentiality obligations, and security measures.

The Company may provide personal data to investigative authorities and other legally authorized bodies under Russian law.

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## 8. Data Storage Duration

- **Business-related data** – duration of contract + 25 years;
- **Employment-related data** – duration of employment + 75 years;
- **Applicant data** – as legally prescribed;
- **Online store customer data** – 5 years from order date;
- **Retail customer data (returns, receipts)** – 5 years from archival entry;
- **Other subjects** – until the purpose of processing is achieved.

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## 9. Security Measures

The Company ensures the security of personal data, including protection from unauthorized or accidental access, destruction, modification, copying, provision, or distribution, by implementing:

- Threat identification and risk analysis;
- Adoption of internal regulations;

- Appointment of responsible personnel in departments and systems;
  - Secure handling and accounting of documents and data;
  - Controlled access and logkeeping;
  - Secure physical and technical infrastructure (access control, surveillance, alarms, etc.);
  - Staff training.
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## **10. Principles of Data Processing**

The Company adheres to the following principles:

- Lawfulness and fairness;
  - Processing for specific, legitimate purposes only;
  - No processing incompatible with original purpose;
  - No merging of incompatible datasets;
  - Processing only relevant and necessary data;
  - Data kept accurate and up to date;
  - Destruction or depersonalization when purposes are fulfilled.
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## **11. Legal Grounds for Processing**

Personal data is processed based on at least one of the following:

- With the data subject's consent;
- As required to perform legal obligations of the Company;
- As required to fulfill a contract or initiate a contract with the data subject;
- For the legitimate interests of the Company or third parties, if not in conflict with subject rights;
- If the subject has made the data publicly available;
- As required by federal law for publication or disclosure.

Internal directories (e.g. employee contact lists) may include names, positions, emails, and phone numbers — only with the employee's consent and subject to removal upon request.

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## **12. Rights of the Data Subject**

Any data subject whose data is processed by the Company has the right to:

- Receive confirmation of data processing and legal grounds;
- Obtain details about data use, recipients, retention periods, cross-border transfers, etc.;
- Request correction, blocking, or destruction of incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary personal data;

- Withdraw consent at any time in writing;
- Demand rectification of any unlawful actions by the Company;
- File a complaint with Roskomnadzor or a court;
- Exercise all other rights under Federal Law No. 152-FZ.

Upon receipt of evidence of outdated or incorrect data, the Company is obliged to correct, block, or delete the data and notify the data subject.

Subjects may contact the Company in person or by official mail at:

**4 Shlyuzovaya Embankment, Moscow, 115114, Russia**