

**Approved by the Order of the General Director of LLC
"RE Trading" No. RT/2023/138 dated April 6, 2023,
by A.A. Pilyugina.**

**Developed in accordance with the "Recommendations for
drafting a document defining the operator's policy regarding
the processing of personal data, in the manner established by
the Federal Law of July 27, 2006, No. 152-FZ "On Personal
Data" of Roskomnadzor.**

Personal Data Processing Policy of Limited Liability Company "RE Trading"

1. General Provisions

1.1. Purpose:

This Policy of LLC "RE Trading" (Primary State Registration Number (PSRN) 1127747192540, located at: 115114, Moscow, Shlyuzovaya Embankment, Building 4, hereinafter referred to as the "Company") regarding the processing of personal data (hereinafter referred to as the "Policy") is a local regulatory act of the Company that defines the basic principles, purposes, conditions, and methods of processing personal data, lists of subjects and processed personal data, the Company's functions in processing personal data, the rights of personal data subjects, and the implemented requirements for the protection of personal data. The purpose of the Policy is to protect the rights of personal data subjects during their processing, including the protection of the rights to privacy, personal and family secrets, and ensuring the security of personal data.

1.2. Scope of Application:

The Policy applies to all personal data and operations with them within the Company, whether processed using automation tools or without them.

The Policy is mandatory for execution by the managers and employees of the Company and all its structural divisions who have access to personal data and whose work is related to personal data.

The Policy is available for review by all individuals without exception. In compliance with Part 2 of Article 18.1 of the Personal Data Law, this Policy is published in free access on the Internet on the Company's website.

1.3. Legal Basis for Processing Personal Data:

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

- The current legislation of the Russian Federation, including the following regulatory legal acts: the Labor Code of the Russian Federation; the Tax Code of the Russian Federation; Federal Law No. 54-FZ of May 22, 2003, "On the Use of Cash Register Equipment in the Russian Federation"; Federal Law No. 14-FZ of February 8, 1998, "On Limited Liability Companies"; Federal Law No. 402-FZ of December 6, 2011, "On Accounting"; Federal Law No. 167-FZ of December 15, 2001, "On Compulsory Pension Insurance in the Russian Federation";
- Other regulatory legal acts governing relations related to the activities of the Operator: Directive of the Bank of Russia No. 3210-U of March 11, 2014, "On the Procedure for Conducting Cash Operations by Legal Entities and Simplified Procedure for Conducting Cash Operations by Individual Entrepreneurs and Small Businesses";
- Decree of the President of the Russian Federation No. 188 of March 6, 1997, "On Approval of the List of Confidential Information";
- Employment contracts;
- Civil law contracts;
- Consents of personal data subjects to the processing of personal data.

The processing and security of personal data are carried out in accordance with the requirements of the Constitution of the Russian Federation and Federal Law No. 152-FZ of July 27, 2006, "On Personal Data."

1.4. Key Terms Used in the Policy:

"Personal Data": Any information relating to a directly or indirectly identified or identifiable individual. Such information includes data that, alone or in combination, allows the identification of a specific individual, including: full name, year, month, date, and place of birth, address, family, social, property status, education, profession, income, health status, email address, phone number;

"Biometric Data of an Employee": Information characterizing the physiological characteristics of a person and on the basis of which his or her identity can be established;

"Processing of Personal Data": Any action (operation) or a set of actions (operations) performed with personal data, using automation tools or without them, including collection, receipt, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data;

"Operator": The Company, LLC "RE Trading";

"Subject of Personal Data": An individual in accordance with Section 3 of this Policy;

"Confidentiality of Personal Data": The operator who has gained access to personal data is obliged not to disclose it to third parties and not to distribute personal data without the consent of the personal data subject.

2. Purposes of Collecting and Processing Personal Data

2.1. The processing of personal data is limited to achieving specific, predetermined, and lawful purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not allowed. Only personal data that meets the purposes of their processing is subject to processing. The processing of employees' personal data may be carried out solely for the purpose of ensuring compliance with laws and other regulatory legal acts.

2.2. The Company processes personal data for the following purposes:

-To conduct its business activities in accordance with the legislation of the Russian Federation and the Company's Charter, including the conclusion and execution of contracts with counterparties;

-To comply with labor legislation within the framework of labor and other directly related relations, including: assisting employees in employment, education, and career advancement; attracting and selecting candidates for employment; ensuring the personal safety of employees; monitoring the quantity and quality of work performed; ensuring the safety of property; maintaining personnel and accounting records; filling out and submitting required reporting forms to authorized bodies; organizing the registration of employees in the systems of compulsory pension insurance and compulsory social insurance;

-To implement access control.

3. Subjects of Personal Data. Scope of Personal Data

3.1. The subjects of personal data are the following categories of individuals:

-Employees and former employees of the Company, family members of the Company's employees;

-Applicants and candidates for employment in the Company;

-Customers of the Company (retail stores and online stores) and other individuals returning goods;

-Customers of retail stores who have filled out a form to receive an electronic receipt;

- Counterparties (individuals) of the Company;
- Employees and representatives of counterparties (legal entities);
- Employees and managers of the Company's founder;
- Participants in the Company's marketing events.

3.2. The content and scope of processed personal data must correspond to the stated purposes of processing, as provided in Sections 2 and 3 of this Policy. Processed personal data must not be excessive in relation to the stated purposes of their processing. The Operator may process personal data of the following categories of personal data subjects:

3.2.1. Applicants and candidates for employment with the Operator - for the purposes of complying with labor legislation within the framework of labor and other directly related relations, implementing access control:

- Full name, gender;
- Citizenship;
- Date and place of birth; contact details;
- Education, work experience, qualifications;
- Other personal data provided by applicants and candidates in resumes and cover letters

3.2.2 Employees and former employees of the Operator - for the purposes of complying with labor legislation within the framework of labor and other directly related relations, maintaining personnel records, recording working hours, calculating wages, maintaining tax records, maintaining military records, submitting reports to state bodies, archival storage of data, for the purpose of issuing a bank card of JSC "ALFA-BANK" for salary payments, for the use of corporate mobile communication "Beeline," creating an employee account, preparing a workplace for the employee, including technical means, implementing access control:

- Full name,
- Gender;
- Citizenship;
- Date and place of birth;
- Photograph;
- Passport details;
- Address of residence registration;
- Actual residence address;
- Contact details;
- Taxpayer Identification Number (TIN);

- Insurance Number of Individual Ledger Account (**SNILS**);
- Education, qualifications, professional training, and advanced training;
- Marital status, presence of children, family ties;
- Information about work experience, including awards, recognitions, and/or disciplinary actions;
- Marriage registration data;
- Military registration data;
- Disability data;
- Alimony withholding data;
- Income data from previous employment;
- Other personal data provided by employees in accordance with labor legislation requirements.

-Biometric personal data, namely photographic images, are used for the purpose of producing an access pass to ensure single or multiple entries to the protected office area and to establish the identity of the individual.

-Personal data of employees and former employees are stored no longer than required by the purposes of their processing and are subject to destruction upon achieving the purposes of processing or in case of loss of necessity for their achievement. Documents containing personal data are stored and destroyed in accordance with the archival legislation of the Russian Federation.

3.2.3. Family members of the Operator's employees - for the purposes of complying with labor legislation within the framework of labor and other directly related relations:

- Full name;
- Degree of kinship;
- Year of birth;
- Other personal data provided by employees in accordance with labor legislation requirements.

3.2.4. Customers and individuals processing returns and/or exchanges of goods in the Company's stores:

3.2.4.1 The scope of processed personal data of customers of the Company's retail stores: in order to comply with the requirements of Federal Law No. 54-FZ of May 22, 2003, the Company obtains the consent of customers to process their personal data, namely full name, phone number, and/or email address. This information is necessary for the Company to send an electronic receipt. Customers provide this personal data in a paper form. Paper forms are transferred to the accounting department and stored in a separate folder in a safe or locked cabinet for 1 year, after which they are transferred to the archive, where they are stored for 5 years. After 5 years, the forms are subject to destruction. Data about customers in electronic form, in order to comply with the requirements of Federal Law No. 54-FZ, are transferred to the OFD (Fiscal Data Operator).

3.2.4.2. The scope of processed personal data of individuals processing returns and/or exchanges of goods in the Company's stores: full name, passport details, address of residence registration, bank details (the list of personal data may vary depending on the requirements of regulatory legal acts). Data is

collected to verify that cash is issued to the individual specified in the cash disbursement order. A copy of the passport is not taken. An authorized representative of the Company verifies the data of the individual specified in the return application with the data of the presented passport. The individual processing the return and/or exchange of goods provides personal data in a paper application.

Such applications from stores are transferred to the accounting department for verification and then stored in the archive. The storage period for applications in the archive is 5 years from the date of receipt. After 5 years, the applications are subject to destruction.

3.2.4.3. When operating online stores, telephone conversations are recorded (audio recording). Audio recording is carried out with prior notification to the customer and the operator of the online store that the conversation is being recorded. Recordings of telephone conversations are stored, if technically possible, for 1 year in the personal account of Mango-Office, after which they are subject to destruction if there is no technical possibility to store them. Telephone recordings are made and stored for the purpose of evaluating the quality of operators' work, resolving customer complaints, and disputes with courier services. When operating online stores, customer data necessary for processing an order under a remote sales contract and its delivery to the customer is collected, and the customer's consent to the processing of their personal data and its transfer to third parties for the purpose of processing and delivering the order is obtained. Data is destroyed upon achieving the purpose of its processing.

3.2.4.4. In the Company's retail stores, provided that appropriate informational signs ("Video Surveillance in Progress") are posted, video surveillance is conducted in the sales areas to prevent unlawful actions on the store premises. Video recordings are provided to police officers upon official written request. Video recordings are stored in the store for no more than 1 month and are subject to destruction after this period.

3.2.5. Clients and counterparties of the Operator (individuals) - for the purposes of conducting the Company's activities in accordance with its Charter, implementing access control:

- Full name;
- Date and place of birth;
- Passport details;
- Address of residence registration;
- Contact details;
- Taxpayer Identification Number (TIN);
- Bank account number;
- Other personal data provided by clients and counterparties (individuals) necessary for the conclusion and execution of contracts. Data is stored for the duration of the contract and for 25 years after the expiration of the contract in the archive of the legal department.

3.2.6. Representatives (employees) of clients and counterparties of the Operator (legal entities) - for the purposes of conducting the Company's activities in accordance with its Charter, implementing access control:

- Full name;
- Passport details;

-Contact details;

-Position held;

-Other personal data provided by representatives (employees) of clients and counterparties necessary for the conclusion and execution of contracts. Data is stored for the duration of the contract and for 25 years after the expiration of the contract in the archive of the legal department.

3.2.7. The scope of personal data of the Company's managers and founders may include full name, passport details, and position. Data is collected and processed for the purpose of conducting the Company's business activities. Data is stored in the organization's archive for the entire duration of the Company's activities.

3.2.8. Participants in the Company's marketing events. For the purpose of promoting goods on the market, increasing sales, and enhancing the recognition of retail stores, the Company conducts marketing events and competitions, during which the following personal data of clients (potential customers) is collected and processed: full name, email address, phone number. Paper forms are stored in the office. Personal data provided by clients electronically is stored in personal messages on social networks and email. After the completion of marketing events, personal data is subject to destruction unless the client has given consent to the processing of personal data for other purposes, such as receiving informational newsletters.

3.3. The Company does not collect or process special categories of personal data related to racial or ethnic origin, political views, religious or philosophical beliefs, or intimate life.

3.4. Personal data on paper is stored in the Company for the periods of storage of documents, as provided by the legislation on archival affairs in the Russian Federation (Federal Law No. 125-FZ of October 22, 2004, "On Archival Affairs in the Russian Federation," the List of Typical Management Archival Documents Generated in the Course of Activities of State Bodies, Local Self-Government Bodies, and Organizations, with Indication of Their Storage Periods (approved by Order of Rosarkhiv No. 236 of December 20, 2019)). The storage period for personal data processed in personal data information systems corresponds to the storage period for personal data on paper.

4. Procedure and Conditions for Processing Personal Data. Principles of Processing Personal Data

4.1. Actions performed with personal data include: collection, receipt, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data.

4.2. Methods of processing personal data in the Company: automated (using computer technology) and non-automated (manual).

4.3. The period of processing personal data is considered to be the period from the start of processing until its termination.

4.4. The start of the processing period coincides with the date the Company receives the personal data.

4.5. The termination of the processing period is determined by the occurrence of one of the following events:

- Achievement of the purposes of their processing;

- Expiration of the subject's consent or withdrawal of consent for the processing of personal data;
- Detection of unlawful processing of personal data;
- Termination of the organization's activities;
- Expiration of the period specified in this Policy.

4.6. The Company has the right to entrust the processing of personal data to third parties based on a contract concluded with these parties. Persons processing personal data on behalf of the Company are obliged to comply with the principles and rules of processing and protecting personal data provided for by Federal Law No. 152-FZ "On Personal Data." For each person, the list of actions (operations) with personal data that will be performed by the legal entity processing personal data, the purposes of processing, the obligation of such person to maintain confidentiality and ensure the security of personal data during their processing, as well as the requirements for the protection of processed personal data, are determined.

4.7. The Operator has the right to transfer personal data to investigative and inquiry bodies, other authorized bodies on the grounds provided for by the current legislation of the Russian Federation.

4.8. The Company establishes the following periods for processing and storing personal data:

- Personal data processed for the purposes of core activities - during the term of the civil law contract and for 25 years after the expiration of the contract;
- Personal data processed in connection with labor relations - during the term of the employment contract and for 75 years after the termination of the employment contract;
- Personal data of applicants and candidates for the period established by law;
- Personal data of online store customers for 5 (five) years from the date of the Order;
- Personal data of customers of retail stores and online stores and other individuals who have processed returns of goods for 5 years from the date of receipt of the return application in the archive;
- Personal data of customers of retail stores who have filled out a form to receive an electronic receipt for 5 years from the date of receipt of the form in the archive;
- Personal data of other subjects, upon achieving the purposes of processing personal data.

4.9. Ensuring the Security of Personal Data

The Operator ensures the security of processed personal data. The Company understands the security of personal data as the protection of personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution, or other unlawful actions in relation to personal data. The Company takes the necessary legal, organizational, and technical measures to protect personal data, including:

- Identifying threats to the security of personal data during their processing;
- Adopting local regulatory acts and other documents regulating relations in the field of processing and protecting personal data;
- Appointing persons responsible for ensuring the security of personal data in the structural divisions and information systems of the Operator;
- Creating the necessary conditions for working with personal data;
- Organizing the accounting of documents containing personal data;

- Organizing work with information systems in which personal data is processed;
- Storing personal data under conditions that ensure their safety and prevent unauthorized access to them;
- Organizing training for the Company's employees who process personal data;
- Identifying threats to the security of personal data during their processing in personal data information systems.
 - Applying organizational and technical measures to ensure the security of personal data during their processing in personal data information systems, necessary to fulfill the requirements for the protection of personal data, the implementation of which ensures the levels of personal data protection established by the Government of the Russian Federation;
- Using information protection tools that have passed the established conformity assessment procedures;
- Assessing the effectiveness of the measures taken to ensure the security of personal data before putting the personal data information system into operation;
- Taking measures to detect and prevent unauthorized access to personal data;
- Establishing rules for access to personal data processed in the personal data information system, as well as ensuring the registration and accounting of all actions performed with personal data in the personal data information system;
- Monitoring the measures taken to ensure the security of personal data and the level of protection of personal data information systems;
- Accounting for machine-readable media containing personal data;
- Organizing access control to the Company's office premises;
- Storing employees' personal data in specially designated premises that ensure protection against unauthorized access;
- Placing technical means of processing personal data within the protected area;
- Maintaining technical security and alarm systems in constant readiness.

To coordinate actions to ensure the security of personal data, the Company has appointed persons responsible for ensuring the security of personal data.

The processing and security of personal data are carried out in accordance with the requirements of the Constitution of the Russian Federation, Federal Law No. 152-FZ "On Personal Data," and subordinate regulations.

4.10. The Operator stores personal data in a form that allows the identification of the personal data subject for no longer than required by each purpose of processing personal data, unless the storage period for personal data is established by federal law or contract.

4.11. When processing personal data, LLC "RE Trading" adheres to the following principles:

- Lawfulness and fairness, collecting data only for the purposes defined in the Policy;
- Limiting the processing of personal data to achieving specific, predetermined, and lawful purposes;
- Prohibiting the collection and processing of personal data that is incompatible with the purposes of collecting personal data as defined in the Policy;
- Prohibiting the merging of databases containing personal data processed for incompatible purposes;
- Processing only the personal data that is relevant to the purposes of its processing;

-Ensuring the accuracy and relevance of personal data.

4.12. The Company processes personal data only if at least one of the following conditions is met:

- The processing of personal data is carried out with the consent of the personal data subject for the processing of their personal data;
- The processing of personal data is necessary to achieve the purposes provided for by the legislation of the Russian Federation, for the performance of functions, powers, and duties assigned to the operator by the legislation of the Russian Federation;
- The processing of personal data is necessary for the execution of a contract to which the personal data subject is a party, beneficiary, or guarantor, or for the conclusion of a contract at the initiative of the personal data subject or a contract under which the personal data subject will be a beneficiary or guarantor;
- The processing of personal data is necessary to exercise the rights and legitimate interests of the Company or third parties or to achieve socially significant goals, provided that the rights and freedoms of the personal data subject are not violated;
- The processing of personal data is carried out, access to which is provided to an unlimited number of persons by the personal data subject or at their request;
- The processing of personal data is carried out, which is subject to publication or mandatory disclosure in accordance with federal law.

4.13. For informational purposes, the Company may create sources of personal data of employees, including directories and address books. With the employee's consent, the following information may be included in the sources of personal data: last name, first name, patronymic, position, contact phone numbers, and email address. Information about an employee must be excluded from the sources of personal data at any time at the employee's request.

4.14. The Operator destroys or anonymizes personal data upon achieving the purposes of processing or in case of loss of the necessity to achieve the purposes of processing. When the purposes of processing personal data are achieved or the personal data subject withdraws their consent, personal data must be destroyed, unless otherwise provided by the contract to which the personal data subject is a party, beneficiary, or guarantor.

5. Rights of Personal Data Subjects. Updating, Correcting, Deleting, and Destroying Personal Data

5.1. The subject (individual) whose personal data is processed by the Company has the right to:

5.1.1. Receive from the Company:

- Confirmation of the fact that the Company and third parties involved are processing their personal data;
- The legal grounds and purposes of processing personal data;
- Information about the methods of processing personal data used by the Company;
- The name and location of the Company;
- Information about persons who have access to personal data or to whom personal data may be disclosed based on a contract with the Company or federal law;

-A list of processed personal data related to the citizen who submitted the request and the source of their receipt, unless another procedure for providing such data is provided by federal law;

-Information about the terms of processing personal data, including the terms of their storage;

-Information about the procedure for exercising the rights provided by Federal Law No. 152-FZ "On Personal Data";

-Information about the ongoing or planned cross-border transfer of personal data;

-The name and address of the person processing personal data on behalf of the Company;

-Other information provided by Federal Law No. 152-FZ "On Personal Data" or other federal laws.

5.1.2. Demand clarification, blocking, or destruction of their personal data if the data is incomplete, outdated, inaccurate, unlawfully obtained, or unnecessary for the stated purpose of processing;

5.1.3. Withdraw their consent to the processing of personal data;

5.1.4. Demand the elimination of unlawful actions by the Company regarding their personal data;

5.1.5. Appeal the actions or inaction of the Company to the Federal Service for Supervision of Communications, Information Technology, and Mass Media (Roskomnadzor) or in court if the citizen believes that the Company is processing their personal data in violation of the requirements of Federal Law No. 152-FZ "On Personal Data" or otherwise violates their rights and freedoms;

5.1.6. Protect their rights and legitimate interests.

5.2. If the personal data subject provides facts about incomplete, outdated, inaccurate, or unlawfully obtained personal data, the Company is obliged to make the necessary changes, destroy, or block such data, and notify the personal data subject of its actions. If the inaccuracy of personal data is confirmed, the data must be updated, and if the processing is unlawful, such processing must be terminated.

5.3. Any individual can obtain clarification on the processing of personal data by contacting the Operator in person or by sending an official request by Russian Post to the address: 115114, Moscow, Shlyuzovaya Embankment, Building 4. Upon the request of the personal data subject (or their representative), the Company is obliged to inform about the availability of their personal data and provide an opportunity to review them.