

## Privacy policy

This Privacy Policy is an official document of STYLE TRADE LLC (TIN 6316219992) in relation to the processing of personal information and it determines the procedure for processing and protection of information with regard to the individuals being users of the products and services of the online store located over the Internet at the tab page: <https://en.lime-shop.ru>.

Privacy requirements compliance is important for our Company, since the purpose of this Privacy Policy is to ensure the protection of human and civil rights and freedom when processing his personal data, including the protection of the rights to privacy, personal and family secrets, against unauthorized access and disclosure.

We have developed a Privacy Policy which describes the way we process personal data - any action (operation) or series of actions (operations) performed by using the computer tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data.

The matters related to the processing of personal data and information concerning the Website users are governed by this Regulation, other Operator's official documents and the applicable laws of the Russian Federation.

We lawfully and fairly perform the processing of personal data, acting reasonably and in good faith and pursuant to the following principles:

- legal compliance of the purposes and methods when processing of personal data;
- voluntary provision of personal data;
- good faith;
- purposes of processing personal data conformity with the same previously set out and declared when collecting of personal data;
- conformity of scope and nature of the processed personal data and methods of processing thereof with the purposes of processing of personal data.

### **Objectives of the Policy:**

- ensure the security of personal data of website users when receiving, processing (using), transferring, storing, disposing and taking other steps provided for by the Law;
- ensure the proper level of website users' credibility to the services we offer;
- ensure the proper fulfillment of commitments undertaken by our Company to the website users while executing contracts concluded through this Website and its services.

### **What personal information we collect**

In order to allow you an access to the Website and its services, and subsequently to handle your order and deliver the goods, we should know:

- Your Surname and Name (how to address and whose name to be referred in orders)
- Your phone number;
- Your email;
- The above-mentioned data is necessary to keep in touch with us, log in to the Website, restore access, if any, to your account.

Furthermore, it's all necessary to send you cashier's receipts for purchased goods and services, to contact you when the purchased goods be delivered to the pick-up point; If you wish to be aware of the hot deals of the Website and with your prior consent, we can send you messages on the offered goods.

- Your username (login) - the username specified on the Website upon your registration. We need it to distinguish you from other Website users.

- Your password (specified on the Website upon your registration). We need it to provide you with access to the Website and its services, as well as to secure your personal information and purchase history from third parties.

Keep your username and password secret from third parties to avoid incidents. If you suspect that they have become known to someone, please contact our technical support service.

The data we provide with is sufficient to get access to the website and its services, your purchase and to receive goods.

Where provided for by law or upon occurrence of an incident, we may ask you for additional personal data (e.g. to prepare a written response or to make a refund).

#### **Purposes of collection by the Company of personal data used by the Company.**

- performance of the contract (s), to which the user of the website and its services is a party or the beneficiary (recipient of goods), including contracts with third parties (for the purposes of purchasing, checking the quality, storing and issuing of goods ordered by you, as well as the acceptance of payments;
- Website user's verification, including cases of restoring access or credentials modification at the user's request;
  - submission of documents on payments in accordance with Federal Law No. 54-FZ;
  - settlement of eventual conflict issues;
  - improvement of service quality;
  - statistical research practice;
  - communication with the Company;
  - providing of advertising information at the user's request;
  - minimization of the Company's legal risks.

#### **Processing methods used by the Company:**

with using of computer tools;

without using computer tools;

The Company does not process special categories of personal data.

#### **Personal data processing consent. Consent Obtaining**

Upon registration (re-registration) on the website, before starting to operate in the personal account, the Website user decides to provide his (her) personal data and freely agrees to its processing, of his own free will and benefit. The Consent to the personal data processing must be particular, informed and conscious.

The Consent is obtained by automatic input of the data specified in this Policy into the fields of the Consent form, as well as identification of the user by phone number and email address after click of the appropriate button in the registration field.

Failure the user to give Consent to the Company, shall be followed by the tacit suspension of registration (re-registration) on the Website, and, as a consequence, the further impossible use of the Website and the services provided therewith, since the Company will not be able to continue the fulfillment of the agreements terms without breaching the law (including acceptance of payments, transfer of goods).

The Company reserves the right to implement other methods for obtaining Consent and which are consistent with applicable Laws.

The Company, its employees and business partners involved in the purchase, transport, quality control and issuance process having access to personal data are bound not to disclose the users' personal data to other third parties and not to spread it.

#### **Consent Withdrawal c**

Consent may to be revoked by the subject of personal data through:

- letter sent to the Website technical support service;
- written notice sent to the Company registered office;
- submission of written notice to the address of the pick-up point;
- other ways provided for by law or the Policy.

The Consent Withdrawal shall be followed by the further impossible use of the Website and the services provided therewith, since the Company will not be able to continue the fulfillment of the agreements terms without breaching the law (including acceptance of payments, transfer of goods).

In the event of withdrawal of Consent, the Company has the right to delete the user account and personal data received from such a subject within 7 (Seven) calendar days from the day following the day of the withdrawal.

The Personal data specified in deals concluded by the user (including, but not limited to contracts, commission contracts, delivery contracts, etc.) will be erased in a manner prescribed by law upon the expiration of time limits set forth by Order of the Ministry of Culture of Russia dated 25.08.2010 No. 559 "On approval "The list of standard administrative archive documents generated in the course of state bodies, local self-government bodies and organizations activities, mentioning the storage periods" and the expiration of time limits set forth by Federal Law as of the 06.12.2011 No.402-FZ "On accounting" regarding the primary accounting documents generated by using of the subject's personal data upon payments, issuance and receipt of ordered goods in pursuance of the above-mentioned agreements.

Where the user withdraws the Consent, the Company has the right to continue the personal data processing only if there are the grounds expressly set forth in the law (part 2 art. 9 the Federal Law No. 152 - FZ) (e.g., for performance of the agreement entered into before the Constant withdrawal).

### **User rights and obligations**

The scope of user's rights and obligations is set forth by applicable laws. More details regarding the Regulations, on the basis of and in compliance with which we have prepared the Policy, can be found over the Internet at the tab pages <http://www.consultant.ru/>, <http://www.garant.ru/> and others.

This Policy represents only an addition to the general provisions of regulatory legal acts for the purpose of regulating of a specific model of the Company's relations with users and which has developed through the Website and its services use.

We are unable to verify the authenticity of the personal data specified by the user upon registration, with the exception of the phone number and e-mail address, however, we proceed from the fact that the user indicates reliable personal data.

Where the user provided inaccurate personal data, he solely bears the risk of potential negative consequences (e.g. denial to restore access if the subject is not verified according to the personal data which he previously provided, failure to refund the payment or issue the goods).

The user has to keep secret his credentials for access to the website and its services (login and password) from third parties. In the event that the credentials have become known to third parties or the website user - the subject of personal data has reason to believe the occurrence of these circumstances, he should contact the technical support service.

### **Company rights and obligations**

The scope of the rights and obligations of the Company as a personal data operator is hset forth by applicable laws. More details regarding the Regulations, on the basis of and in compliance with which we have prepared the Policy, can be found over the Internet at the tab pages <http://www.consultant.ru/>, <http://www.garant.ru/> and others.

This Policy represents only an addition to the general provisions of regulatory legal acts for the purpose of regulating of a specific model of the Company's relations with users and which has developed through the Website and its services use.

### **Personal data processing**

Processing of personal data - any action (operation) or series of actions (operations) performed by using the computer tools or without using such tools with personal data, including

collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data.

We carry out the personal data processing in accordance with the requirements of law, this Policy and local regulations.

According to the purposes of personal data collection, the Company determines the tasks, terms, methods and conditions for personal data processing, a list of responsible and involved persons. Such tasks, terms, methods, conditions, persons are subject to approval in the Company's local regulations.

Company's responsible persons:

- take legal, organizational and technical steps to secure personal data from unauthorized or accidental access thereto and from erasing, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions with regards to personal data;
- exercise internal control over compliance with legal requirements;
- bring to our employees' attention the provisions of the legislation on personal data processing, the requirements for personal data protection;
- organize the reception and processing of applications and requests, to exercise the control over the reception and processing of such applications;
- take the necessary measures to eliminate violations.

### **Personal data transfers**

In the course of our work, we do not make cross-border transfers of personal data. This means that it will not be transferred to foreign countries and companies.

The Company carries out internal and external receipt and transfer of personal data of users from the user's contracting partners (agents, commission agents, sellers, principals, carriers, etc.), acting in his interests (including, but not limited to, when purchasing, accepting, transferring, storing and issuing of goods), and those who are in contractual relations with Style Trade LLC, as well as to the contracting partners of Style Trade LLC (agents, commission agents, principals, carriers, etc.), also acting in the subject's interests (including, but not limited to when purchasing, accepting, transferring, storing and issuing goods) exclusively for the purposes specified in this Policy, when purchasing, checking quality, storing and transferring goods ordered by websites users, settling payments with users, upon prompt execution of closing documents, when resolving conflict situations and assessing the website and its services quality and in other events set forth in the regulatory acts and this Policy.

### **Destruction of personal data**

The deletion, destruction of personal data are carried out in the manner provided for by applicable laws and regulations of the Company.

In general terms, the deletion, destruction of personal data are to be performed by the responsible persons:

- in cases provided by law;
- at the request of the user, government agency or court;
- upon expiration of the storage period;
- upon expiration of the necessity;

The destruction of personal data, as a general rule, takes place on commission basis, so there excluded any possibility of its theft and unauthorized use.

The destruction of hard copies is carried out by using a paper cutter by shredding documents into pieces, ensuring that the text cannot be recovered.

The typewritten media containing personal data - if any (except for hard drives of PCs, servers), are stored in the strongbox. Upon expiration of necessity, typewritten media are physically destroyed in order to make impossible its recovering and further use. This is achieved by deformation, carrier integrity damaging, or by its burning.

The files to be destroyed and located on the hard disk of a PC or server are deleted by means of operating system, followed by "emptying the recycle bin".

### **Protection of personal information. Potential damage assessment**

For the purpose of personal data protection, we apply measures and methods set out in the regulatory documents.

In order to secure the protection of personal data, the Policy will not provide for specific algorithms of security schemes, but only general solutions.

The applied solutions to secure personal data, implemented within the personal data protection system, taking into account the current threats to the security of personal data and applied information technologies, consist of (including, but not limited to):

- identification and authentication of access subjects and access objects;
- access control for access subjects to access objects;
- limitation of the software environment;
- protection of machine data carriers which store and (or) proceed personal data and (or);
- security events logging;
- anti-virus protection;
- detection (prevention) of intrusions;
- control (analysis) of the personal data security;
- ensuring of information system and personal data integrity;
- ensuring of the availability of personal data;
- virtualization environment protection;
- hardware protection;
- protection of the information system, its facilities, communication and data transmission systems;
  - identification of incidents (one event or a group of events) that can lead to failures or disruption of the information system operation and (or) the emergence of threats to the security of personal data (hereinafter - incidents), and responding to them;
  - configuration management of the information system and personal data protection system;

We carry out periodic audits of applied solutions and update them.

The damage assessment that may be caused to users in case of violation by the Company of the requirements of the Federal Law of 27.07.2006 No. 152-FZ "On Personal Data" is determined in accordance with Art. Art. 15, 151, 152, 1101 of the Civil Code of the Russian Federation. The balance between the said damage and measures which we assume to prevent, exclude and / or eliminate its consequences is set forth in this Policy and other local regulations of the Company.

For the purposes of this Policy, damage means moral damage and / or material damage to the user or the Company, which can actually be caused where someone violates the security architecture. The extent of damage is determined in accordance with Art. Art. 15, 151, 152, 1101 of the Civil Code of the Russian Federation.

The damage prevention is a complex of legal, organizational and technical measures to be assumed. Legal measures consist of research and application of legislation related to the prevention of damage, the development of local acts and their application in this field of the Company's activities. Organizational measures include diligent selection, training and personnel appointments, increasing of their motivation in the matter of damage prevention. Technical measures combine the creation of conditions and the implementation of measures to prevent damage, including the following

- safeguarding of the operator's property, including physical storage media, by implementation and maintain of the appropriate security modes.

- preventing the acquisition of Company's confidential information, including the same considered as commercial and official secrets, to unauthorized persons by allocating special premises for personnel data processing and storage.
- ensuring information security of the Company, uninterrupted operation of technical means for personal data processing.
- physical protection of facilities being on the Company's balance sheet by implementing the in-house security regulations and staffed checkpoint.
- physical protection of the Company's employees in the performance of their official duties, a comfortable moral and psychological atmosphere and an environment of business cooperation amid our employees.
- immediate recovery of personal data modified or destroyed due to unauthorized access thereto.
- permanent control over the level of protection of personal data.

In order to prevent damage, we appoint persons responsible for managing the personal data processing.

### **Collection and use of information other than personal data**

The website and its services, interactive services and applications, e-mail messages and any other communications on behalf of the Company may use identity files (cookies) and other technologies, such as: pixel tags, web beacons.

Such technologies help us to understand the behavior of users of the website and its services, in particular which sections of the website and its services had been visited by users and to perform the advertising and network searches evaluation. We consider the information collected by cookies and other technologies as non-personal information.

Our goal in these cases is to provide a more convenient and personal interaction with the user of the website and its services with the ultimate purpose to improve the level of service.

The user can disable cookies in the settings of the web browser or his (her) mobile device. Please note that some functions of the website may become unavailable once cookies are disabled.

Some technical information is collected automatically and stored in log files. Such information includes, but is not limited to: Internet Protocol (IP) address, browser type and language, ISP information, referral and exit pages, operating system information, date and time stamp, and information about visits. We use this information to understand and analyze trends, to run the website, research the user's behavior on the website and collect demographic information about our heavy-half users. We have right to use this information for our marketing purposes.

Some messages sent by e-mail use interactive links to information posted on the Company's website. When users follow such links, before they come to the destination page on our website, their requests are to be registered separately. The Company monitors such "pass-through" data in order to determine the interest of users of the website and its services in specific topics and to evaluate the degree of effective communication with our consumers. Where the user wishes his requests not to be tracked in this way, he should not follow text or graphic links in e-mail messages.

Pixel tags allow us to send e-mail messages in a consumer-readable format and let us know if such messages have been read. The company has the right to use such information to limit the number of messages sent to consumers or to stop sending.

### **Receiving of advertising information. Advertising opt-out.**

We may place any kind of advertising materials on our Website pages . If the user of the Site and its services does not want to get acquainted with these offers, he should not follow the posted text or graphic links.

The user, at his own discretion, can be notified of commercial offers carried out by us or other the Website users by e-mail or SMS notifications.

For this purpose, at the time of filling out the Consent, the user confirms his wish to receive advertising mailing, indicating the preferable modes of its receiving.

The user has the right to refuse such mailing in whole or in part by:

- letter sent to the Website technical support service;
- written notice sent to the Company registered office;
- submission of written notice to the address of the pick-up point;
- other ways provided for by law or the Policy.

Refusal to receive newsletters shall not entail any negative consequences for the user.

In this case, we will assume measures aimed at excluding the communication methods specified by the user from the newsletter. In some cases, this may require a certain time (in particular, if the services for sending advertising messages are carried out through services provided by third parties) and therefore the user will not have claims against the Company in connection with the possible receipt of advertising messages before the expiration of 30 calendar days from the date of the notice of rejection.

### **Final provisions f**

- The persons breaching the requirements of legal regulations and this Policy, are liable in the manner set forth by law.
- In order to control the quality of service, we have the right to record telephone conversations.
- The Company has the right to unilaterally make changes / additions to this Policy. In order for the changes / additions to take effect, we follow the procedure for the preliminary publication of such information on the Website and which come into force upon expiration of 10 calendar days from the date of their publication, and no additional agreements should be signed.
- Special rule:
  - changes / additions made to the Policy and related documents in connection with changes in applicable laws and regulation come into force immediately, at the moment of publication, or at the same time with the coming into effect of changes made in the said acts;
  - changes / additions to the Policy and related documents in connection with the development of functions and features performed by the website and its services, changes in the composition and structure of documents, terminology and in other similar cases, come into force upon the publication of such changes / additions on the website from the date, specified herein.
  - any changes / additions to the Policy from the date of entry into force in compliance with the above procedures shall apply to all persons using the website and its services before the date of coming into force of the changes / additions.

### **Consent to the personal data processing**

I, of my own free will and in my interest, give this consent for processing, including collection, systematization, accumulation, storage (clarification, updating, modification), extraction, use, transfer to third parties, anonymization, blocking and destruction of my personal data - surname, name, patronymic, date of birth, gender, registration or residence address, contact phone number, e-mail address, my payment details in favor of STYLE TRADE Limited Liability Company (TIN 6316219992) located at the following address: 443022, Russia, Samara, st. 22 Party Congress, Block 7A, Office 221, its employees who process personal data by the nature of their activity, as well as to STYLE TRADE LLC contracting partners (agents, commission agents, sellers, carriers, etc.), also acting in my interests (including, but not limited to, when purchasing, accepting, transferring, storing, delivering and issuing goods, receiving cash and making non-cash payments (hereinafter referred to as the "Seller"), to perform an action (operation) or a set of actions (operations) performed by using computer tools or without the use of such means in order to provide me with goods and services (products), including, but not limited to: identification of the participant in any programs, secure the procedure for calculating, accounting and spending bonuses (if any), delivery, provision of services, distribution of information and advertising

messages (by SMS, e-mail, telephone, other means of communication), receiving of feedback throughout the terms of validity of my account (account with a username and password) on the Website, as well as within the time limits set forth by Order of the Ministry of Culture of Russia dated 25.08.2010 No. 558 "On approval of the" List of standard administrative archival documents generated in the process activities of state bodies, local authorities and organizations, indicating the storage periods "- with regards to my data specified in the contracts I concluded through the Website and its services, as well as within the time limits set forth by Federal Law No. 402-FZ dated 06.12.2011 "On accounting" - in relation to primary accounting documents generated by using my personal data when making payments, issuing and receiving goods ordered by me in pursuance of these contracts.

I hereby also give my consent to the cross-border transfer of my personal data, including in the territory of foreign countries not entered in the list approved by Roskomnadzor Order of 03/15/2013 No. 274 (as amended on the 29/10/2014) "On approval of the list of foreign countries which are not parties to the Council of Europe Convention for the Protection of Individuals with regard to Computer Processing of Personal Data and providing adequate protection of the rights of personal data subjects", in order to fulfill the above-mentioned purposes of personal data processing.

I confirm that personal data and other information relating to me (surname, name, patronymic, date of birth, gender, passport data, registration or residence address, contact phone number, e-mail address, payment details) have been provided by me to the Seller by entering them upon registration on the website are voluntary and reliable. I am notified that in case of inaccuracy of provided personal data and information, the Seller reserves the right to terminate the service through the LIME-SHOP.RU website.

I agree that my personal data will be processed in ways that are consistent with the purposes of personal data processing, without making a decision based solely on the computer processing of my personal data.

This consent is given by me for 10 years from the date of registration on the LIME-SHOP.RU website and it has been brought to my attention that I can withdraw this Consent by:

- letter sent from your account on the Website to the Website technical support service at the email specified on the Website;
- written notice sent to the Company registered office;
- submission of written notice to the address of the pick-up point specified on the Website;
- other ways provided for by law or the Policy.

I would like to receive advertising mailings about current commercial offers in relation to the goods offered for sale on the Website on behalf of the Company and other users of the Site and its services through:

SMS notifications: yes

Email messaging yes

I am informed that I can opt out to receive mailing by:

- letter sent from your account on the Website to the Website technical support service at the email specified on the Website;
- written notice sent to the Company registered office;
- submission of written notice to the address of the pick-up point specified on the Website;
- other ways provided for by law or the Policy.