

## **Privacy Policy of personal data of Limited Liability Company «Sveak» (LLC «Sveak»)**

This Privacy Policy defines the procedure of collection, storage, transfer and other processing of personal data of individuals («Users»), carried out by Limited Liability Company «Sveak», registered at the address city Barnaul, street Shumakova 23A, office 408.

### **1. General provisions**

The Company respects the right of each User to confidentiality of provided personal data and undertakes to ensure compliance with the rights of Users in relation to the processing of personal data.

Basic terms and definitions:

- Company - Limited Liability Company «Sveak».
- User - a person accessing the services and information posted on the Site.
- Site - the Company's website located on the Internet at <https://sveak.com>.
- Personal Data: any information relating directly or indirectly to a certain or definable natural person (subject of personal data). For example, first name, last name, e-mail address, telephone number, IP address of the device.
- Processing of personal data: any action (operation) or set of actions (operations) performed with or without the use of means of automation with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

The purpose of this policy:

- Informing Users about the procedure of personal data processing by the Company.
- Determination of measures aimed at protection of personal data from unauthorized access and misuse.

### **2. Principles of personal data processing**

Processing of personal data is carried out on the basis of the principles of:

- legality of the purposes and methods of personal data processing;
- compliance of the purpose of processing with the Company's business objectives;
- minimization of the volume of processed personal data;
- accuracy, sufficiency and reliability of personal data;

- limiting the period of personal data processing to the achievement of specific, predetermined and legitimate purposes.

### **3. Collection and processing of personal data**

When visiting the website, the User provides personal data. By providing personal data, the User agrees to the terms of this privacy policy.

The categories of personal data collected are:

- surname, first name, patronymic;
- e-mail address;
- IP address of the device;
- date of birth (if applicable);
- browser information;
- device type information;
- time of visit;
- geolocation.

Data is collected solely for the purpose of fulfilling the service contract between the Company and the User, providing information materials, sending notifications and marketing messages.

### **4. Purposes of personal data processing**

The collected personal data is used exclusively for the following purposes:

- identification of the User when providing the service/selling the goods;
- realization of feedback with the User;
- organization of interaction with Users by means of phone calls, e-mails, SMS messages;
- analyzing the behavior of Users on the site in order to improve the quality of service;
- formation of statistical reporting.

### **5. Transfer of personal data to third parties**

The Company guarantees inviolability of personal data and transfers them to third parties only in cases stipulated by law or with the consent of the subject of personal data.

The transfer is possible within the framework of fulfillment of obligations to third parties, service providers or partners acting on the basis of an agreement with the Company.

## **6. Personal data protection measures**

To prevent unauthorized access to personal data, the Company takes organizational and technical measures:

- limited access of employees to personal data;
- use of encryption when transmitting data via the Internet;
- regular updating of software and technical solutions to protect against information security threats;
- control of employees' compliance with the requirements for personal data processing.

## **7. Rights of personal data subjects**

Users have the following rights regarding their personal data:

- obtaining information about the methods of personal data processing;
- request for deletion, modification, amendment of personal data;
- revocation of the previously granted consent to the processing of personal data;
- sending requests regarding their personal information.

All requests are sent by e-mail or by post to the Company's registered office.

## **8. Modification of Privacy Policy**

The Company reserves the right to make changes to this Privacy Policy. All changes will be published on the official website of the Company.

## **9. Responsibility of the parties**

Violation of the procedure for processing personal data shall entail liability under the laws of the Russian Federation.

## **10. Final provisions**

This document comes into force from the moment of its publication on the Company's website and is valid indefinitely until it is replaced by a new version.

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