

Personal Data Processing Policy

1. General provisions

- 1.1. The personal data processing policy (hereinafter “the Policy”) is intended to protect rights and freedoms of the individuals whose personal data is being processed by EFIR DEVELOPMENT LLC (hereinafter “the Operator”).
- 1.2. The Policy is developed according to Clause 2, Part 1, Article 18.1, *Federal Personal Data Law* No. 152-FZ dated July 27, 2006 (hereinafter “the Federal Personal Data Law”).
- 1.3. The Policy contains information to be disclosed according to Part 1, Article 14, *Federal Personal Data Law*, and is available in public domain.

2. Operator details

- 2.1. The Operator carries out its business at: 11, Staroye Dmitrovskoye Highway, Apt. 1053, town of Dolgoprudny, Moscow Region.
- 2.2. The General Director, Mr. Denis Khanifovich Shayakhmetov (tel. +7 (985) 341-1541) is appointed the person in charge of personal data processing.
- 2.3. The database containing personal data of Russian nationals is located at: 41, Korovinskoye Highway, Moscow.

3. Personal data processing details

- 3.1. The Operator processes personal data on legitimate and fair grounds, to perform the functions, powers and duties imposed and conferred on the Operator by law, to exercise the rights and legitimate interests of the Operator, the Operator’s employees and third parties.
- 3.2. The Operator obtains personal data directly from the personal data constituents.
- 3.3. The Operator processes personal data by automated and non-automated methods, using and not using computers.
- 3.4. Personal data processing steps include: collection, recording, classification, accumulation, storage, specification (updating, modification), extraction, use, transmission (dissemination, provision, access), depersonalization, blocking, deletion and destruction.
- 3.5. Databases of the information containing personal data of Russian nationals are located in the Russian Federation.

4. Customers’ personal data processing

- 4.1. The Operator processes the customers’ personal data as part of the legal relations with the Operator, which are governed by Part 2, Russian Civil Code, dated January 26, 1996, No. 14-FZ (hereinafter “the customers”).
- 4.2. The Operator processes the customers’ personal data in order to comply with Russian law and also to:
 - conclude and perform contracts with customers;
 - carry out lines of business envisaged in the constituent documents of EFIR DEVELOPMENT LLC;
 - advise of the new goods, special actions and offers;
 - comply with the anti-money laundering law.
- 4.3. The Operator processes the customers’ personal data with their consent provided for the effective period of the contracts concluded with them. In cases envisaged in the *Federal Personal Data Law*, the consent is provided in writing. In other cases, the consent is deemed obtained at entering into the contract or taking implicative actions.
- 4.4. The Operator processes the customers’ personal data during the effective periods of the contracts concluded with them. The Operator may process customers’ personal data after the expiry of the contracts concluded with them, during the period specified in Clause 5, Part 3, Article 24, Part 1, Russian Tax Code, and Part 1, Article 29, *Federal Accounting Law*, and other regulations and laws.
- 4.5. The Operator processes the following customer’s personal data:
 - Full name;
 - Identification document type, series and number;
 - Identification document issue date and information on the issuing authority;
 - Year of birth;
 - Month of birth;
 - Date of birth;
 - Place of birth;
 - Address;
 - Telephone number;
 - Email address;
 - Taxpayer’s ID;
 - State pension insurance certificate number;

- Nationality;
 - Residential address;
 - Information on purchased goods.
- 4.6. To achieve the personal data processing goals and with the customers' consent, the Operator provides personal data or authorizes the following persons to process them:
- at the request of governmental agencies;
 - counterparties, for KYC procedure.

5. Individuals' personal data processing: buyers

- 5.1. The Operator processes personal data of individual "buyers" as part of legal relations with the Operator, which are governed by Part 2, Russian Civil Code, dated January 26, 1996, No. 14-FZ.
- 5.2. The Operator processes personal data of individual "buyers" in order to:
- conclude and perform contracts;
 - carry out lines of business envisaged in the constituent documents of EFIR DEVELOPMENT LLC;
 - comply with the anti-money laundering laws;
 - account for buyers and the digital assets they buy.
- 5.3. The Operator processes personal data of individual "buyers" with their consent provided for the effective period of the contracts concluded with them. In cases envisaged in the *Federal Personal Data Law*, the consent is provided in writing. In other cases, the consent is deemed provided at entering into the contract or taking implicative actions.
- 5.4. The Operator processes personal data of individual "buyers" during the effective periods of the contracts concluded with them. The Operator may process personal data of individual "buyers" after the expiry of contracts concluded with them, during the period specified in Clause 5, Part 3, Article 24, Part 1, Russian Tax Code, and Part 1, Article 29, *Federal Accounting Law*, and other regulations and laws.
- 5.5. The Operator processes the following personal data of individual "buyers":
- Full name;
 - Email address;
 - Information on purchased goods.
- 5.6. To meet the personal data processing goals and with consent of individual "buyers", the Operator provides personal data to or makes sure it is processed by the following persons:
- at the request of governmental authorities;
 - counterparties, for implementation of KYC procedure.

6. Individuals' personal data processing: counterparties

- 6.1. The Operator processes personal data of individual "counterparties" as part of legal relations governed by Part 2, Russian Civil Code, dated January 26, 1996, No. 14-FZ.
- 6.2. The Operator processes personal data of individual "counterparties" in order to:
- conclude and perform contracts;
 - carry out business envisaged in the constituent documents of EFIR DEVELOPMENT LLC;
 - comply with the anti-money laundering law.
- 6.3. The Operator processes personal data of individual "counterparties" with their consent provided for the effective period of the contracts. In cases envisaged in the *Federal Personal Data Law*, the consent shall be made in writing. In other cases, the consent shall be deemed received when the contract is entered into or with implicative actions are taken.
- 6.4. The Operator processes personal data of individual "counterparties" during the effective periods of the contracts concluded with them. The Operator may process personal data of individual "counterparties" upon expiry of the contracts concluded with them, during the period specified in Clause 5, Part 3, Article 24, Part 1, Russian Tax Code, Part 1, Article 29, *Federal Accounting Law*, and other regulations and laws.
- 6.5. The Operator processes the following personal data of individual "counterparties":
- full name;
 - identification document type, series and number;
 - identification document issue date and information on its issuing authority;
 - year of birth;
 - month of birth;
 - date of birth;
 - place of birth;
 - address;
 - telephone number;
 - email address;
 - taxpayer's ID;
 - state pension insurance certificate number;

- nationality;
- residential address.

7. Personal data security details

7.1. The Operator appoints the person in charge of personal data processing, for performance of the duties envisaged in the *Federal Personal Data Law*, and the regulations adopted thereon.

7.2. The Operator takes a set of legal, organizational and technical efforts to keep personal data safe, to keep the personal data confidential and to protect them from illegal actions:

- provides unlimited access to the Policy, a copy of which is located at the Operator's address and may be posted on the Operator's website (if any);
- in furtherance of the Policy, approves and enacts the *Regulation on Personal Data Processing* (hereinafter "the Regulation") and other local laws;
- has the employees acquainted with the personal data law, the Policy, and the Regulation;
- provides the employees with access to the personal data processed in the Operator's information system, to their tangible media for performance of employment duties only;
- establishes rules of access to the personal data processed in the Operator's information system, and ensures registration and recording of all actions with them;
- estimates the harm that may be caused to the personal data constituents if the *Federal Personal Data Law* is breached;
- identifies the personal data safety threats in their processing in the Operator's information system;
- takes organizational and technical efforts and uses information protection devices required to achieve the prescribed personal data protection level;
- detects actual unauthorized access to personal data and takes response efforts, including restoration of the personal data modified or destroyed as a result of the unauthorized access to them;
- assesses efficiency of the efforts taken to ensure personal data safety before the launch of the Operator's information system;
- exercises internal control over conformity of the personal data processing to the *Federal Personal Data Law*, the regulations adopted thereon, the personal data protection requirements, the Policy, the Regulation and other local regulations, in particular, monitoring of the efforts taken to ensure personal data safety and their safety level in processing in the Operator's information system.

8. Personal data constituents' rights

8.1. The personal data constituent shall be entitled to:

- receive personal data pertaining to the constituent and information pertaining to its processing;
- specify, block or destroy his/her personal data if it is incomplete, outdated, inaccurate, illegally obtained or unnecessary for the stated processing purpose;
- revoke the consent to the personal data processing;
- protect its powers and legitimate interests, in particular, be indemnified against losses and emotional distress in the court of law;
- appeal against the Operator's actions or omissions to the competent authority in charge of personal data processing or in a court of law.

8.2. To exercise their rights and legitimate interests, the personal data constituents shall be free to apply to the Operator or send the request personally or using the representative. The request shall contain the information specified in Part 3, Article 14, *Federal Personal Data Law*.