

PRIVACY POLICY

I. General

1. Basic terms and definitions:

personal data - any information directly or indirectly relating to a defined or definable individual (subject of personal data);

seller - individual entrepreneur, Iulia Grigorevna Remiannikova, acting on the basis of the Certificate of Registration as an individual entrepreneur 59 №005001593 dated August 3, 2016, with its principal place of business at bld. 2A, Monastyrskaja str., Perm, Russian Federation, 614000;

processing of personal data - any action (operation) or a set of actions (operations) performed with or without automation means with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating and modification), extraction, use, communication (distribution, provision and access), depersonalization, blocking, deletion, and destruction of personal data;

automated processing of personal data - processing of personal data by means of computers;

distribution of personal data - actions aimed at disclosing personal data to the public;

provision of personal data - actions aimed at disclosing personal data to a defined person or to the public;

blocking of personal data - temporary suspension of the personal data processing (except where processing is required to clarify personal data);

destruction of personal data - actions that make it impossible to recover the contents of the personal data in the personal data information system and (or) as a result of which tangible media with personal data are destroyed;

depersonalisation of personal data - actions that make it impossible to use additional information to determine personal data ownership by a certain personal data subject;

personal data information system - a set of personal data included in the databases and information technologies and technical facilities ensuring their processing;

trans-border transfer of personal data - personal data transfer to the territory of a foreign state, authority of a foreign state, foreign individual or foreign legal entity;

web-site visitor – person, who visited <http://ravvast.com> (hereinafter - the Web-site);

user – individual, who logged in the Web-site;

buyer – individual, who ordered any goods on the Web-site;

personal data subject – person, who is a user or a buyer, for the purposes of this Policy

2. Personal data of the User / Buyer shall be processed in accordance with the Federal Law "On Personal Data" No. 152-FZ (hereinafter - the Law on Personal Data) and other regulations covering Seller's activities.

3. Data provided to the Seller:

3.1. when logging in the Web-site:

3.1.1. name;

3.1.2. e-mail;

3.2. when placing an order on the Web-site:

3.2.1. last name;

3.2.2. name;

3.2.3. e-mail;

3.2.4. country, settlement, zip code, street and building required to deliver goods ordered on the Web-site.

4. The Web-site Visitor / User / Buyer agrees to personal data processing by the Seller by providing its personal data to the Seller, including for the Seller to fulfil its obligations to the Web-site Visitor / User /

Buyer within the [Public Offer \(hyperlink\)](#), to promote its goods and services, to conduct electronic and SMS-polling, to monitor marketing actions, to support customers, to organize goods delivery to the Buyer, to hold prize drawings for the Web-site Visitors / Users / Buyers, and to control Web-site Visitor`s / User`s / Buyer`s satisfaction and goods and services quality.

5. The principles and conditions for the personal data processing, measures and obligations of the Seller for their protection are described in Section II of this Policy.

II. Processing of personal data

6. Principles of the personal data processing by the Seller:
 - 6.1. Personal data are processed on a legal and fair basis.
 - 6.2. Personal data processing is limited to specific, pre-determined and legitimate purposes. Personal data shall not be processed in conflict with the purposes of the personal data collection.
 - 6.3. Databases containing personal data shall not be combined, the processing of which is made for the purposes in conflict with each other.
 - 6.4. Only the personal data that meet the purposes of their processing shall be processed.
 - 6.5. The content and scope of the personal data being processed shall meet the processing objectives stated. Personal data being processed are not redundant in relation to the processing objectives stated.
 - 6.6. While personal data processing their accuracy, sufficiency and, if necessary, relevance to the processing objectives shall be ensured. The Seller shall take all necessary measures or ensure their acceptance for incomplete or inaccurate data deletion or clarification.
 - 6.7. Personal data shall be stored in a form allowing to determine the subject of the personal data, no longer than it is required by the personal data processing objectives, unless the storage period of the personal data is established by a Federal Law or contract where subject of the personal data is a party, beneficiary or guarantor. Personal data being processed shall be destroyed or depersonalized upon processing objectives achievement or in the event the objectives are no longer needed to be achieved, unless otherwise provided for by the Federal Law.
7. Terms and conditions for the personal data processing by the Seller:
 - 7.1. Personal data shall be processed in compliance with the principles and rules as provided for by the Law on Personal Data. Processing of the personal data is allowed in the following circumstances:
 - 7.1.1.1. personal data are processed with the consent of the subject of the personal data to its personal data processing;
 - 7.1.1.2. personal data processing is required to achieve its objectives, as provided for by the international treaty of the Russian Federation or the law, for the functions, powers and duties implementation and performance by the Seller imposed by the Russian legislation;
 - 7.1.1.3. personal data are processed in connection with any person participation in constitutional, civil, administrative and criminal proceedings, or proceedings in arbitration courts;
 - 7.1.1.4. personal data processing is required to enforce ruling of the court and act adopted by another body or official, subjecting to enforcement in accordance with the law of the Russian Federation on enforcement proceedings;
 - 7.1.1.5. personal data processing is required to perform a contract where subject of the personal data is a party, beneficiary or guarantor, as well as to conclude a contract on the initiative of the personal data subject or a contract where personal data subject will be a beneficiary or guarantor;
 - 7.1.1.6. personal data processing is required to protect life, health or other vital interests of the subject of the personal data, if it is impossible to obtain consent of the subject of the personal data;

- 7.1.1.7. personal data processing is required to exercise the Seller's or third parties' rights and legitimate interests, including in the events as provided for by the Federal Law on "Protection of the Rights and Legal Interests of Individuals in activities on overdue debt repayment and on amendments to the Federal Law on Microfinance Activity and Microfinance Organizations", or to achieve social significant objectives, provided that the rights and freedoms of the subject of the personal data are not violated;
 - 7.1.1.8. personal data are processed, the access to which is provided to an unlimited public by the subject of the personal data or at its request (hereinafter - the personal data made available to the public by the subject of the personal data);
 - 7.1.1.9. personal data are processed, subjecting to publishing or obligatory disclosing under the Federal Law.
 - 7.2. Personal data of the state security objects and their family members are processed taking into account the specifics provided for by the Federal Law "On State Security" No. 57-FZ dd. May 27, 1996.
 - 7.3. The Seller shall have a right to instruct another person to process personal data with the consent of the personal data subject, unless otherwise provided for by the Federal Law, based on the contract concluded with this person (hereinafter - the Operator's instruction). The person performing personal data processing on behalf of the operator shall observe the principles and rules for the personal data processing provided for by the Law on Personal Data. The Operator's instruction shall specify the list of actions (operations) with the personal data to be performed by the person processing the personal data and processing objectives, it shall be established the duty of such person to maintain confidentiality of the personal data and to ensure safety of the personal data while their processing, as well as it shall be specified the requirements for the personal data processed protection in accordance with Article 19 of the Law on Personal Data.
 - 7.4. A person engaged in the personal data processing under the Operator's instruction is not required to obtain the consent of the personal data subject to process its personal data.
 - 7.5. In the event the Seller instructs another person to process personal data, the Seller shall be liable for the actions of above person to the personal data subject. Person engaged in the personal data processing under the Operator's instruction shall be liable to the Seller.
8. Liabilities of the Seller:
 - 8.1. In personal data collection, the Seller shall provide information to the personal data subject, at its request, as provided for in Part 7 of Article 14 of the Law on Personal Data.
 - 8.2. In personal data collection, including through the Internet, information and telecommunications network, the Seller shall ensure recording, systematization, accumulation, storage, clarification (updating and modification) and deletion of the personal data of the citizens of the Russian Federation using databases located on the territory of the Russian Federation, except for the cases specified in clauses 2, 3, 4, 8 of Part 1 of Article 6 of the Law on Personal Data.
 - 8.3. The Seller shall provide information, in the procedure provided for in clause 14 of the Law on Personal Data, to the personal data subject or its representative about personal data availability relating to the relevant personal data subject and provide an opportunity to review these personal data upon personal data subject or its representative address or within thirty days from the date of request submitted by the personal data subject or its representative.
 - 8.4. In case of refusal to provide information of the personal data availability about the relevant personal data subject or personal data to the personal data subject or its representative upon their address or upon request submitted by the personal data subject or its representative, the Seller shall provide a reasonable response in writing containing a reference to the provision of Part 8 of Article 14 of this Law on Personal Data or other regulatory legal act, which is the basis for such refusal, within a

- period not exceeding thirty days from the date of the personal data subject or its representative address or from the date of request submitted by the personal data subject or its representative.
- 8.5. The Seller shall provide free possibility to the personal data subject or its representative to review the personal data relating to this personal data subject. Within a period not exceeding seven working days from the date of information submission by the personal data subject or its representative confirming that the personal data are incomplete, inaccurate or irrelevant, the Seller shall make all necessary changes. Within a period not exceeding seven working days from the date of information submission by the subject of the personal data or its representative confirming that such personal data are illegally obtained or are not required for the processing objective stated, the Seller shall destroy such personal data. The Seller shall notify the subject of the personal data or its representative about any changes made and measures taken, and take all reasonable measures to notify the third parties, to whom personal data of this subject were transferred.
 - 8.6. The Seller shall provide all necessary information to the authorized body dealing with the rights protection of the personal data subjects at this body's request within thirty days from the date of such request receipt.
 - 8.7. In the event the objective of the personal data processing is achieved, immediately stop personal data processing and destroy or impersonate the relevant personal data within a period not exceeding thirty (30) days from the date of this objective achievement, but no longer than the period established by the current law, about which the personal data subject shall be notified.
 - 8.8. If the personal data subject withdrew its consent for its personal data processing, stop personal data processing and destroy them within a period not exceeding thirty (30) days from the date of this withdrawal receipt, but no more than the period established by the current law, about which the personal data subject shall be notified.
 - 8.9. If the personal data subject submitted its request to stop its personal data processing in order to promote goods on the market, immediately stop personal data processing.
 - 8.10. Take measures necessary and sufficient to ensure duties performance as provided for by the Law on Personal Data and other regulatory legal acts. The Seller shall independently determine the scope and list of measures necessary and sufficient to ensure duties performance as provided for by the law.
 - 8.11. Submit the documents and local acts specified in Part 1 of Article 18 of the Law on Personal Data and / or otherwise confirm the measures taken as specified in Part 1 of Article 18 of the Law on Personal Data at request of the authorized body dealing with rights protection of the personal data subjects.
 - 8.12. Take all necessary legal, organizational and technical measures or ensure them to be taken to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution, as well as from other illegal actions against the personal data.

III. Procedure for the rights execution provided by the Federal Law No. 152 "On Personal Data"

9. The personal data subject can address the Seller by sending relevant request in writing (at the address provided by the Seller) or in the form of electronic document (at e-mail address of the Seller - hi@ravvast.com).
10. The personal data subject can address the Seller in free form, but from the content of address it should be possible to identify its objectives and identity of the sender.
11. While addressing the personal data subject shall specify its contact details and desired method of communication, as well as address for notice of action, if such notice is stipulated by the current laws.
12. The period for address review shall be five (5) working days, unless shorter period is stipulated by the current laws.

13. Upon this period expiration, as specified in clause 12 of this Policy, the Seller shall send response to the personal data subject by the communication method selected by the latter.

IV. Miscellaneous

14. The Seller shall have a right to send information, including advertising messages, to e-mail and mobile phone of the User / Buyer with its consent, expressed by agreement with this Privacy Policy.
15. The User / Buyer has a right to refuse from advertising and other information without explaining the reasons for such refusal by informing the Seller of its refusal. Service notifications, informing User / Buyer about order and stages of its processing, cannot be rejected by the User / Buyer.
16. Consent withdrawal to the personal data processing is made by sending relevant application in free form to e-mail of the Seller: hi@ravvast.com.
17. The Seller has a right to use "cookies" technology. "Cookies" do not contain confidential information. Visitor / User / Buyer hereby agrees to cookies collection, analysis and use, including by the third parties to form statistics and to optimize advertising messages.
18. The Seller receives information about ip-address of the Web-site visitor. This information is not used to identify the visitor.
19. The Seller is not responsible for the information provided by the User / Buyer on the Web-site in a public format.
20. The Seller has a right to record telephone conversations with the User / Buyer - citizen of the Russian Federation located on the territory of the Russian Federation. In this case, the Seller shall: prevent attempts to unauthorized access to the information received during telephone conversations and / or its transfer to the third parties not directly related to the Orders execution, in accordance with cl. 4 of art. 16 of the Federal Law "On Information, Information Technologies and Information Protection". The Seller shall not be entitled to record telephone conversations with the User / Buyer who is not the citizen of the Russian Federation and / or who is located outside the territory of the Russian Federation.