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APPROVED

by General Director of
TRADEX Limited Liability Company
/signature/ E.A. Khazova

January 11, 2021

/Stamp: TRADEX Limited Liability Company, Saint Petersburg/

Personal Data Processing Policy

1. General provisions

This Personal Data Processing Policy is compiled in accordance with the requirements of Federal Law No. 152-FZ dated 27.07.2006 "On Personal Data" and defines the procedure for processing personal data and measures to ensure the security of personal data taken by the TRADEX LLC (hereinafter referred to as the Operator).

1.1. The Operator sets the observance of the rights and freedoms of people and citizens in the processing of their personal data, including the protection of the rights to privacy, personal and family secrets, as its most important goal and condition for the implementation of its activities.

1.2. This Operator's policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator can receive about website visitors <http://tradex.expert/>.

2. Basic concepts used in the Policy

2.1. Automated processing of personal data, which is processing of personal data using computer technology;

2.2. Blocking of personal data, which means temporary termination of processing of personal data (except for cases when processing is necessary to clarify personal data);

2.3. Website is a set of graphic and informational materials, as well as computer programs and databases that ensure their availability on the Internet at a network address <http://tradex.expert/>;

2.4. Personal data information system, which is a set of personal data contained in databases, and information technologies and technical means that ensure their processing;

2.5. Depersonalization of personal data, which means actions as a result of which it is impossible to determine, without the use of additional information, the identity of personal data to a specific User or other subject of personal data;

2.6. Personal data processing means any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;

2.7. Operator is a state body, municipal body, legal entity or individual, independently or jointly with other persons organizing and (or) processing personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data;

2.8. Personal data means any information related directly or indirectly to a specific or identifiable User of the Website <http://tradex.expert/>;

2.9. User is any visitor to the website <http://tradex.expert/>;

2.10. Provision of personal data means actions aimed at disclosure of personal data to a certain person or a certain circle of persons;

2.11. Distribution of personal data means any actions aimed at disclosure of personal data to an indefinite circle of persons (transfer of personal data) or familiarization with personal data of an unlimited circle of persons, including the publication of personal data in the media, placement in information and telecommunications networks or providing access to personal data in any other way;

2.12. Cross-border transfer of personal data means transfer of personal data to the territory of a foreign state to the authority of a foreign state, a foreign individual or a foreign legal entity;

2.13. Destruction of personal data means any actions as a result of which personal data is permanently destroyed with the impossibility of further restoration of the content of personal data in the personal data information system and (or) the material carriers of personal data are destroyed.

3. The Operator may process the following personal data of the User:

3.1. First name, surname, patronymic name;

3.2. Email address;

3.3. Phone numbers;

3.4. There is a collection and processing of anonymous data about visitors (including cookies) using Internet statistics (Yandex Metric and Google Analytics and others).

3.5. The above User data is combined by the general concept of Personal Data.

4. Purposes of personal data processing

4.1. The purpose of processing the User's personal data is to calculate the cost of delivery.

4.2. The Operator is entitled to send notifications to the User about new products and services, special offers and various events. The User can always refuse to receive informational messages by sending the Operator a letter to the email address tradex@tradex.expert, marked "Refusal of notifications about new products and services and special offers".

4.3. Depersonalized User data collected through Internet statistics services are used to collect information about User actions on the site, as well as to improve the quality of the site and its content.

5. Legal grounds for processing personal data

5.1. The Operator processes the User's personal data only if they are filled in and/or sent by the User independently through special forms located on the website <http://tradex.expert/>. User agrees with this Policy by filling out the appropriate forms and/or sending their personal data to the Operator.

5.2. The Operator processes depersonalized data about the User if this is allowed in the User's browser settings (the saving of cookies and the use of JavaScript technology are enabled).

6. Procedure for the collection, storage, transfer and other types of personal data processing

6.1. The security of personal data processed by the Operator is ensured through the implementation of legal, organizational and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.

6.2. The Operator ensures the safety of personal data and takes all possible measures to exclude access to the personal data of unauthorized persons.

6.3. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of current legislation.

6.4. In case of inaccuracies in personal data, the User can update them independently by sending a notification to the Operator's email address tradex@tradex.expert marked "Updating of personal data".

6.5. The period of processing of personal data is unlimited. The User can withdraw his/her consent to the processing of personal data at any time by sending a notification to the Operator's e-mail address tradex@tradex.expert marked "Withdrawal of consent to the processing of personal data".

7. Cross-border transfer of personal data

7.1. Before the start of the cross-border transfer of personal data, the Operator is obliged to make sure that the foreign state to whose territory the transfer of personal data is supposed to be carried out provides reliable protection of the rights of personal data subjects.

7.2. Cross-border transfer of personal data on the territory of foreign states that do not meet the above requirements may be carried out only if there is written consent of the personal data subjects to the cross-border transfer of their personal data and/or execution of the contract to which the personal data subject is a party.

8. Final provisions

8.1. Users can receive any clarifications on issues of interest concerning the processing of their personal data by contacting the Operator via e-mail tradex@tradex.expert.

8.2. This document will reflect any changes to the Operator's personal data processing policy. The policy is valid indefinitely until it is replaced by a new version.

8.3. The current version of the Policy is freely available on the Internet at <http://tradex.expert/>.

Organization card

Full name of the organization		TRADEX LIMITED LIABILITY COMPANY
Legal Address		198035, Saint Petersburg, Mezhevoy kanal, 5, lit. AX, room 1-H, off. 359-360
Actual Address		198035, Saint Petersburg, Mezhevoy kanal, 5, lit. AX, room 1-H, off. 359-360
Postal Address		198035, Saint Petersburg, Mezhevoy kanal, 5, lit. AX, room 1-H, off. 359-360
Contact details:	Telephone	+ 7 (812) 401-40-15
OGRN		1027809171026
TIN		7825484877
KPP		780501001
OKVED		52.29, 52.24, 52.24.1, 52.21.2, 49.4, 49.41.1
Full name and position of the Director		Khazova Ekaterina Alexandrovna, General Director
Contact details of the Director		khazova@intrans.net
Full name and position of the Chief Accountant		Shalaeva Irina Vasilievna
Contact details of the Chief Accountant		ishalaeva@intrans.net
Full name and position of the Authorized Signatories for financial documents		-
Bank account details:		
Full name of the bank		ST. PETERSBURG BRANCH OF PJSC PROMSVYAZBANK
Legal Address of the bank		191186, Saint Petersburg, Millionnaya str., 38a, lit. Б
Payment account		30101810000000000920
BIK		40702810606000010895
SWIFT		044030920

General Director /signature/ E.A. Khazova
 /Stamp: TRADEX Limited Liability Company, Saint Petersburg/