

PRIVACY POLICY

www.tdl.ru

1. General Provisions

- 1.1. The Privacy Policy (hereinafter referred to as the Policy) shall apply to all information that Labaz Trade House LLC (hereinafter referred to as the Company) may receive about the user, as well as other persons specified by them during their use of the website www.tdl.ru (hereinafter referred to as the Site).
- 1.2. Use of the Site means the User's unconditional consent to this Policy and the terms of processing of his/her personal information specified therein; in case of disagreement with these terms, the User shall refrain from using the Site.
- 1.3. The Privacy Policy shall apply only to the Site. The Company shall not control and shall not be responsible for third party sites that the user may access via links available on the Site.

2. Personal Information of the Users that the Company Receives and Processes

Under this Policy, the User's personal information is:

- 2.1. Personal information that the user provides about themselves as a contact person, independently when filling out the feedback form or in the process of using the Site, including the user's personal data specified in Appendix No. 1.
- 2.2. In the event that the user provides personal information of a third party, the user shall guarantee to obtain the consent of such third party to the processing of his/her personal data in the scope and on the terms determined by this Policy, the offer of the Site, posted at: www.tdl.ru, and the consent to the personal data processing, located on the Site at: www.tdl.ru, and shall notify the third party of the processing of their personal data by the Company.
- 2.3. Other information about the User, the processing of which is provided for by the consent to the processing of the User's personal data and/or the agreement with the User or the Policy regarding the processing of personal data of the Company.

3. Basic Rights of the Users

- 3.1. With regard to the processing of their personal information, the User has the right to:
 - 3.1.1. receive information regarding the processing of his/her personal information in the manner prescribed by the Federal Law "On Personal Data" (the procedure for sending requests to the Company is specified in Section 8 of the Policy);
 - 3.1.2. take measures provided by law to protect their rights, including demanding that the Company clarify their personal information, block it or destroy it if the personal information is incomplete, outdated, inaccurate, unreliable or illegally obtained;
 - 3.1.3. withdraw their consent to the processing of personal data by the Company. In the event that the User withdraws the consent to the personal data processing, the Company has the right to continue processing personal data if there are other grounds for their processing;
 - 3.1.4. challenge the actions or omissions of the Company in the authorized body for the protection of the rights of personal data subjects (Roskomnadzor) or in court.

4. Purposes of Collecting and Processing Personal Information of the Users

- 4.1. The Company shall collect and store only that personal information that is necessary for the provision of the Sites or the execution of agreements and contracts with the User, or is processed subject to the consent to the personal data processing, as specified in Clause 4.2 below, except in cases where the law provides for mandatory storage of personal information for a period specified by law.
- 4.2. The Company shall process the User's personal information, including collection, receipt, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (provision, access), blocking, deletion, destruction both with the use of automation tools and without the use of such tools, as well as by mixed processing for the following purposes specified in Appendix No. 1 to the Policy. The Company has the right to process personal data for other purposes specified in the consent to the personal data processing.

5. Conditions for Processing Personal Information of the Users and its Transfer to Third Parties

- 5.1. Personal information of the Users shall be processed in accordance with this Policy, other local regulations of the Company and the requirements of the laws on personal data.
- 5.2. Personal information shall be kept confidential, except in cases where the user voluntarily provides information about themselves for general access to an unlimited number of people. By using the Site, the User agrees that a certain part of personal information may become publicly available.
- 5.3. The Company has the right to transfer the User's personal information and / or entrust its processing to third parties in the following cases:
 - 5.3.1. The User has expressed consent to such actions;
 - 5.3.2. the transfer is necessary for the User to use the Sites or for the performance of the agreement with the User;
 - 5.3.3. in order to ensure the possibility of protecting the rights and legitimate interests of the Company;
 - 5.3.4. in other cases established by law.
- 5.4. The Site may contain links to other sites that are not operated by the Company. If the User follows a link, he/she will be taken to a third party site. The Company strongly recommends that the User read the privacy policy on each site he/she visits. The Company does not control and does not assume any responsibility for the content, privacy policy or actions of third party sites or third party services.
- 5.5. The Company shall cease processing personal information and destroy the User's personal information upon achieving the purposes of processing personal information within a period not exceeding 30 calendar days from the time the purpose of processing is achieved, unless otherwise provided by law or by an agreement with the User.

6. Measures Taken to Protect the User's Personal Information

- 6.1. When processing personal information, the Company shall take the necessary legal, organizational and technical measures to protect personal information from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of personal information, as well as from other illegal actions in relation to the User's personal information in accordance with the Personal Data Processing Policy of the Company and the

requirements of the laws on personal data. In particular, the Company shall take measures listed in Clause 5 of Article 18, Article 18.1, Part 2 of Article 19 of the Federal Law “On Personal Data” No. 152-FZ dated July 27, 2006.

7. Obligations of the Company and the User

7.1. The User is obliged to:

7.1.1. provide the Company with reliable personal information of the User necessary for using the Sites;

7.1.2. notify the Company of any changes to their personal data within 3 business days from the date of change.

7.2. The Company is obliged to ensure that the processes of processing the User’s personal information comply with the requirements of the law.

8. Enquiries and Requests from Users and the authorized body

8.1. The Company shall respond to enquiries or requests from the Users or their legal representatives, or to requests from government supervisory authorities regarding the processing of personal information in the manner and within the time limits provided by the Company’s local regulations and the requirements of applicable laws.

8.1.1. In the event of receiving a User’s request for the availability of the User’s personal information, the Company undertakes to respond to such a request, as well as provide the User with the opportunity to familiarize themselves with their personal information within 10 business days from the date of receipt of the request. The request period may be extended by 5 business days if there is a reasoned request from the Company.

8.1.2. In the event of receiving a request from the User or an authorized body regarding the unlawful processing of personal information or the processing of inaccurate personal information, the Company undertakes to block the relevant personal information from the time of receiving such a request for the verification period.

8.1.3. In the event that the fact of inaccuracy of personal information is confirmed, the Company undertakes to clarify the relevant personal information within 7 business days and remove the blocking of personal information.

8.1.4. In the event the fact of unlawful processing of personal information is confirmed, the Company undertakes to cease the unlawful processing of personal information within a period not exceeding 3 business days (destroy the relevant information or ensure the legality of its processing), and also, if the fact of unlawful processing was identified in connection with the request of the User or authorized body, notify the relevant User or authorized body of the measures taken.

8.2. The User’s enquiry or request, or that of the authorized body, may be sent to the Company’s address.

8.3. The User’s enquiry or request shall contain:

- number of the main identity document of the User or his/her representative;
- information on the date of issue of the above document and issuing authority;
- information confirming the User’s relationship with the Company, or information that otherwise confirms the fact that the Company is processing personal information;

- signature of the User or the User's representative.
- 8.4. The request of the authorized body shall:
- contain the number and date of sending;
 - be printed on the letterhead of the supervisory authority;
 - be endorsed by the head or deputy head of the supervisory authority.
- 8.5. The User has the right to re-apply to the Company or send a repeated request for the purpose of obtaining information regarding the processing of their personal information, as well as for the purpose of reviewing the personal information being processed earlier than 30 days after the initial enquiry or request, only if such information or the personal information being processed was not provided to him/her for review in full following the consideration of the initial enquiry. The repeated request, along with the information, shall contain a justification for sending the repeated request.
- 8.6. The Company has the right to refuse the User to satisfy a repeated request that does not meet the conditions described in Clauses 8.3, 8.5.

9. Miscellaneous

- 9.1. The Privacy Policy is posted on the Site at: www.tdl.ru.
- 9.2. The Company has the right to make amendments to the Policy without notifying the User. The User undertakes to review the Policy for any amendments from time to time.
- 9.3. The Company shall inform Users about amendments made to the Policy by posting a new version on the Site. By continuing to use the Sites after the new version is posted, you agree to the new version of the Policy.
- 9.4. The new Policy shall enter into force upon its posting on the Site, unless otherwise provided by the new version of the Policy.
- 9.5. If the User has any questions regarding the Privacy Policy, he/she may send a relevant request to pdn@x5.ru.
- 9.6. Appendices to the Policy: Appendix No. 1 – Purposes, List of Personal Data, Categories of Subjects, Methods of Personal Data Processing, Terms of Processing and Storage of Personal Data, Procedure for Destruction of Personal Data.

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Appendix No. 1

Purposes of Personal Data Processing	Category and List of Personal Data	Categories of Subjects	Methods of Personal Data Processing	Terms of Processing and Storage of Personal Data	Procedure for Destruction of Personal Data
Communication for the purpose of entering into and executing an agreement between a legal entity whose interests are represented by the User and the Company or other legal entities and persons of X5 Group Provision of information (advertisements), including information about new products and/or services, advertising campaigns conducted by the Operator, which may potentially be of interest to the User	• Last name; • First name; • Patronymic; • Phone number; • Email address; • IP address; • Mac address; • Cookies; • Other data specified in the consent to personal data processing.				
Changes in the terms of interaction between the Operator or the X5 Group Companies Processing of claims, complaints, and other requests, including providing feedback following the processing of requests	• Last name; • First name; • Patronymic; • Phone number; • Email address; • Last name; • First name; • Patronymic; • Phone number; • Email address; • IP Address; • Mac Address; • Cookies; • Data on claims, complaints and other enquiries of the User, including data specified in claims,	Users of the Site and the contact persons indicated by them	Collection, receipt, recording, systematization, accumulation, storage, clarification, (updating, changing), retrieval, use, transfer (provision, access), blocking, deletion, destruction, both with the use of automation tools and without the use of such tools, as well as by mixed processing.	During the term of the contractual relationship. During the term of the consent to personal data processing, advertising consent.	Removal of personal data from information systems. Destruction of personal data on paper media by shredding (shredder).

	complaints and other enquiries of the User;				
Conducting surveys, statistical and marketing research, processing the information obtained, including the possibility of commercial use of the results of such surveys and research	• Last name; • First name; • Patronymic; • Phone number; • Email address; • IP address; • Mac address; • Cookies; • Other data specified in the consent to personal data processing				
Ensuring the operation of the website in accordance with its functionality	• IP address; • Mac address; • Cookies; • Other data collected by metrics				