

# Privacy Policy for Personal Data (Notice)

This Personal Data Processing Policy (hereinafter referred to as the Policy) applies to all personal data that the Softline Group of Companies (hereinafter referred to as Softline) may receive from the user during the user's use of the Softline website – www.softline.ru (hereinafter referred to as the Website), Internet services, services, purchase of goods, participation in advertising and marketing campaigns or promotions and/or other interaction with Softline (hereinafter referred to as Services).

This Policy is mandatory for review and execution by all persons authorized to process personal data in Softline, and persons involved in organizing the processing of personal data and ensuring the security of personal data in Softline.

Key concepts used in this Policy:

- personal data – any information relating to a directly or indirectly identified or identifiable individual (subject of personal data);
- personal data operator (operator) – a person who, independently or jointly with other persons, organizes and (or) carries out the processing of personal data, as well as determines the purposes of processing personal data, the composition of personal data subject to processing, actions (operations) performed with personal data (Softline);
- Personal data processing – any action (operation) or set of actions (operations) with personal data, performed with or without the use of automation tools. Personal data processing includes, but is not limited to: collection; recording; systematization; accumulation; storage; clarification (updating, modification); retrieval; use; transfer (distribution, provision, access); depersonalization; blocking; deletion; destruction;
- automated processing of personal data – processing of personal data using computer technology;
- provision of personal data – actions aimed at disclosing personal data to a specific person or a specific group of persons;
- blocking of personal data – temporary cessation of processing of personal data (except in cases where processing is necessary to clarify personal data);
- destruction of personal data – actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which the material carriers of personal data are destroyed;
- depersonalization of personal data – actions as a result of which it becomes impossible to determine the ownership of personal data by a specific subject of personal data without the use of additional information;
- personal data information system – a set of personal data contained in databases and the information technologies and technical means that ensure their processing;
- cross-border transfer of personal data – the transfer of personal data to the territory of a foreign state to a foreign government body, a foreign individual or a foreign legal entity.

This Policy applies to all processes of collecting, recording, systematizing, accumulating, storing, clarifying (updating, changing), retrieving, using, transferring (providing, accessing), blocking, deleting, and destroying personal data carried out using automation tools.

Softline processes personal data in compliance with the principles and rules established by the Federal Law of the Russian Federation of June 27, 2006, No. 152-FZ "On Personal Data".

Softline does not control and is not responsible for third-party websites that users may access through links available on the Softline website. Third-party websites may have their own privacy policies and may collect or request other personal data from the user.

This Policy explains how Softline processes and protects personal data and other information of users.

By using the Services and providing Softline with the information necessary to initiate further interaction, you consent to its use in accordance with this Policy.

For specific Services, Softline may publish additional provisions that supplement this Policy.

This Policy is subject to update in the event of changes in the legislation of the Russian Federation on personal data.

## 1. Personal data of users received and processed by Softline

1.1. For the purposes of this Policy, "user's personal data" means:

1.1.1. Personal data that the user provides about themselves upon registration (creating an account) on the Website or while using the Services. Information required for the provision of Services is clearly marked.

1.1.2. For unregistered users of the Website – individuals making purchases on the Website without registration – such information includes: last name, first name, patronymic, date of birth, delivery address; contact telephone number, organization details, position, email address, country, city, region of residence, bank card details (card mask, card type and subtype, year and month of card expiration).

1.1.3. For registered users of the Website – individuals who have successfully registered on the Website – such information includes: last name, first name, patronymic, contact telephone number, mobile phone number, delivery address, information about the organization, position, email address, information about the country, city, region of residence, information about the bank card (card mask, card type and subtype, year and month of card expiration).

1.1.4. For clients/partners – persons in contractual relations with Softline, such information includes: last name, first name, patronymic, position in the organization with the company name, email address, contact telephone number.

1.1.5. For applicants for vacant positions - persons searching for work, such information includes: last name, first name, patronymic, date of birth, residential address, home telephone number, work telephone number, mobile phone number, email address, information on marital status, information on children, information on education/advanced training (period of study, educational institution, faculty/specialization, obtained specialty according to diploma, form of study), information on certificates, information on experience and length of service (period of work, organization, sphere of activity of the organization, position, main duties), information on knowledge of software products and programming languages, information on knowledge of foreign languages, information on professional qualities, information on personal qualities, city of residence, information on the vacancy of interest, information on work schedule, information on the expected level and form of remuneration, information on hobbies.

1.1.6. Other information about the user, the collection and/or provision of which is determined by Softline for the provision of individual Services additionally, as clearly indicated when ordering individual Services.

1.2. The user's personal data provided to Softline is considered inaccurate and may be blocked until the user or their legal representative consents to the processing of the user's personal data in any form additionally designated by Softline, in addition to that provided on the Website.

1.3. Softline does not make decisions that generate legal consequences for users or otherwise affect their rights and legitimate interests based solely on automated processing of personal data.

## **2. Purpose of processing users' personal data**

2.1. Softline processes only those personal data that are necessary to provide and improve the quality of the Services.

2.2. Softline may use the user's personal data to achieve the following goal: fulfilling Softline's obligations under orders, contracts, and other commitments accepted by Softline as binding on the user. To achieve this goal, Softline implements a set of actions aimed at achieving the following objectives:

2.2.1. Identification of the party within the framework of the provision of the Service.

2.2.2. Providing the user with personalized Services.

2.2.3. Improving the quality of Services and developing new ones.

2.2.4. Conducting statistical and other studies based on anonymized data.

2.2.5. Provision of the user's personal data to copyright holders, distributors, or resellers of software for the purpose of registering the software in the name of the user or the organization whose interests the user represents.

2.2.6. Providing users of the Website with safe and convenient functionality for its use, and effective display of information.

2.2.7. Effective execution of orders, contracts, and other obligations accepted by Softline as binding on the user.

2.2.8. Handling questions from Website users.

2.2.9. Registration of Website users for events.

2.2.10. Registration of Softline clients/partners in the service desk system for subsequent technical support.

2.2.11. Collection of resumes and selection of candidates for vacant positions at Softline.

2.2.12. Implementation and/or performance of functions, powers and duties imposed on Softline by the legislation of the Russian Federation.

2.2.13. Collection of data for marketing purposes (for contacts via email or telephone to offer services, newsletters or register for events).

### **3. Legal grounds for processing personal data:**

- Articles 23, 24 of the Constitution of the Russian Federation.
- Article 90 of the Labor Code of the Russian Federation.
- Federal Law of July 27, 2006 N 152-FZ "On Personal Data".
- Charter and constituent documents of Softline.
- User consent to the processing of personal data.
- Internal regulatory and administrative documents of Softline.

### **4. Transfer of user personal data to third parties**

4.1. The user's personal data is kept confidential, except in cases where the personal data is processed and access to which is granted to an unlimited number of persons by the user or at the user's request.

4.2. Softline has the right to transfer the user's personal data to third parties in the following cases:

4.2.1. The User has provided their consent to such actions, including for the purposes of registering the software in the User's name by copyright holders, distributors, or resellers of the software, and delivering the goods.

4.2.2. The transfer is necessary to achieve the goal, implement and perform the functions, powers and duties imposed on Softline by the legislation of the Russian Federation.

4.3. In order to fulfill obligations under orders, contracts, and other obligations to the user, Softline may carry out cross-border transfer of personal data within the territory of foreign states.

4.4. Types of data transfer and recipients: organizations processing data on behalf of Softline (for the purposes of technical, marketing, and software support), where necessary – independent third parties (auditors, lawyers, regulatory authorities), or recipients to whom data transfer is based on actions and decisions made by the user (for example, in cases where the user has selected delivery to their address with the involvement of a third party).

### **5. Measures taken to protect users' personal data**

5.1. To ensure compliance with the obligations stipulated by Federal Law of the Russian Federation No. 152-FZ of June 27, 2006, "On Personal Data" and the regulatory legal acts adopted in accordance therewith, Softline has taken the following measures to protect the personal data of users:

5.1.1. A person responsible for organizing the processing of personal data has been appointed.

5.1.2. Local regulations on the processing and security of personal data, as well as local regulations establishing procedures aimed at preventing and identifying violations of Russian Federation legislation and eliminating the consequences of such violations, have been issued.

5.1.3. Legal, organizational and technical measures have been applied to ensure the security of personal data.

5.1.4. Rules for access to personal data processed in personal data information systems have been established.

5.1.5. All actions performed with personal data in personal data information systems are registered and recorded.

5.1.6. Rules for backup and recovery of information and personal data are established.

### **6. Rights and obligations of the user**

6.1. Softline takes reasonable measures to maintain the accuracy and relevance of personal data held by Softline, as well as to delete outdated and otherwise inaccurate or unnecessary personal data. However, the User is responsible for providing accurate information and for updating the provided data in the event of any changes.

6.2. The User may at any time change (update, supplement) the personal data they have provided or any part thereof, as well as their privacy settings, by contacting Softline.

6.3. The User has the right to revoke consent to the processing of personal data by Softline at any time by sending a written notice to the address: 115114, Moscow, Derbenevskaya Embankment, Bldg. 7, Novospassky Business Quarter, Bldg. 8, to Softline PJSC with the note "revocation of consent to the processing of personal data", given that the user's revocation of consent to the processing of personal data entails the deletion of the user account from the Website, as well as the destruction of records containing personal data in Softline's personal data processing systems, which may make it impossible to use Softline Internet services.

6.4. The user has the right to request the destruction of their personal data if the personal data is incomplete, outdated, inaccurate, illegally obtained, or is not necessary for the stated purpose of processing.

6.5. The User has the right to receive information regarding the processing of his/her personal data in Softline, for which purpose he/she has the right to send a written request to the address: 115114, Moscow, Derbenevskaya embankment, building 7, Novospassky business quarter, building 8, to Softline PJSC with the note "request for information on the procedure for processing personal data".

6.6. Right to revoke consent: the user has the opportunity to unsubscribe from Softline marketing communications at any time by clicking on the corresponding link present in all Softline marketing communications; the user has the opportunity to change their cookie settings or contact Softline in accordance with the contact information provided in Section 7 of this Policy.

6.7. To comply with the provisions of paragraphs 6.2, 6.3, 6.4, 6.5, and 6.6 of this Policy, Softline may request verification of the user's identity by requiring such verification in any legally compliant form. Softline undertakes to review and respond to the request within 30 (thirty) days of receipt.

6.8. Softline will no longer store or process users' personal data once the period required to achieve the processing purposes has been reached and upon expiration of the data storage period. Softline will cease processing and destroy users' personal data within the timeframes specified in Section 8 of this Policy once the processing purposes have been achieved, unless otherwise provided by current Russian Federation legislation.

6.9. If you believe that Softline's processing of your personal data does not comply with the provisions of this Policy or Federal Law No. 152-FZ of July 27, 2006, "On Personal Data," you have the right to appeal Softline's actions or inaction by contacting Roskomnadzor at the following link: <https://rkn.gov.ru/treatments/ask-question/>. After clicking this link, you will need to select the subject of your request and complete all required fields.

## 7. Feedback. Questions and suggestions

Any suggestions or questions regarding this Policy should be communicated to Softline by phone at +7 (495) 232-0023, or by email at [privacy@softline.com](mailto:privacy@softline.com), or send a written request to the address: 115114, Moscow, Derbenevskaya embankment, building 7, Novospassky business quarter, building 8, to Softline PJSC with the note "questions and suggestions regarding the Personal Data Processing Policy".

## 8. Personal data storage period

**Data collected for the fulfillment of obligations by Softline under orders, contracts, etc., for the fulfillment of obligations to provide services to users assumed by Softline, for the provision of personal data of users to copyright holders, distributors or resellers of software for the purpose of registering software in the name of the user, or in the name of the organization that the user represents.**

- **Shelf life:** Softline stores data for the entire period required for Softline to fulfill its obligations under orders and services purchased by the user, but no more than 2 years from the last interaction with the data, except in cases where there is a valid agreement, legal proceedings, or legal requirement that allows for further processing of the user's personal data, of which the user will be notified.

**Collection of data for marketing purposes (for contacts via email or telephone to offer services, newsletters or register for events).**

- **Shelf life:** Softline stores data for the entire period required to provide information to the user in accordance with his subscription, but not more than 2 years from the last interaction with the data, except in cases where there is a valid agreement, legal proceedings or legal requirement allowing further processing of the user's personal data, of which he will be notified.

**Collecting user data through web forms for the purpose of event registration.**

- **Shelf life:** Softline stores data for the entire period required to fulfill the purpose of processing, but not more than 2 years from the date of the last registration.

**Collection of user data through direct contact via email, telephone or post (provision of personalized services).**

- **Shelf life:** Softline stores data for as long as necessary to fulfill the processing purpose, but no longer than two years from the last interaction with the data, unless there is a valid agreement, legal proceedings, or legal requirement that permits further processing of the user's personal data, of which the user will be notified. Softline may continue to store the user's personal data if there is an obligation arising from a legal requirement to protect the user's vital interests or to protect the vital interests of another individual.

**Data collection using cookies and similar technologies.**

- **Shelf life:** For more detailed information about the terms associated with the use of cookies and similar technologies, please refer to the Cookie Policy.

**Data obtained during the collection of resumes and selection of candidates for vacant positions at Softline.**

- **Shelf life:** Softline stores data for the entire period required to fulfill the purpose of processing, but not more than 2 years from the last interaction with the data.

A longer period of storage of personal data is established by current legislation.

The Softline Group of Companies includes legal entities, [presented at the link](#).

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