

1. Introduction

Softline (its subsidiaries, including each Softline operating company – collectively referred to as “ Softline ”) strives to ensure the protection of the Personal Data of its customers, employees, business partners and any other persons.

The data protection policy (hereinafter referred to as the “Policy”) shows how Softline processes the personal data of clients, suppliers, employees and other categories of individuals, namely, it describes the principles applicable to the processing of personal data in Softline .

Softline's mission and goal is to comply with legal obligations and the highest standards of privacy/data protection in all cases of data processing throughout the entire life cycle of personal data.

The Policy is a document containing general instructions on Softline's actions regarding the protection of personal data, as well as a statement from Softline's management on the standards that must be met.

2. Definitions

Personal data

Any information about an identified or identifiable natural person

Data about the subject

A natural person who has been identified or who can be identified through the processing of personal data. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifying element such as a name, an identification number, location data, an online identifier or to one or more specific elements specific to their physical, physiological, genetic, mental, economic, cultural, or social identity.

Processing

Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or modification, retrieval, consultation, use, disclosure by transmission, dissemination or making available by any other means, alignment or combination, restriction, erasure or destruction.

Recipient

The natural or legal person, public authority, agency or other body, to which the personal data are disclosed, whether a third party or not.

Data Protection Officer (Data Protection (DPO Officer)

A person at Softline who is responsible for compliance with the requirements regarding the protection of personal data, regardless of whether he/she has been appointed as a personal

data protection officer in accordance with the Regulation or has only been assigned specific tasks in this regard, if there is no specially designated personal data protection officer.

Record of processing operations or Personal Data Register

A registry created by Softline to record data processing operations performed by Softline .

Data processor/importer

Company or person authorized by the controller/processor means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller/processor.

Controller / Operator

A natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of processing personal data.

Third party

A natural or legal person, public authority, agency or body other than the data subject, controller, legal successor and persons who, under the direct authority of the controller/processor, are authorised to process personal data.

3. Scope

Softline processes personal data for several general purposes, which are listed in the personal data processing protocol in the form of a register. This Policy applies to all personal data processing performed for Softline or by Softline itself .

This Policy must be observed by all employees, contractors, consultants, including all personnel associated with third parties who may have access to any Softline resources .

4. Application of local legislation

This Policy presents the principles applicable to the processing of personal data that must be observed at Softline . It does not replace the data protection laws applicable in the countries where Softline is established or operates. Legislative requirements take precedence over this Policy. In particular, all reporting and authorization requirements existing in data processing laws, based on national legislation, must be observed.

5. Principles of data processing

Whenever personal data is processed, the rights and freedoms of the data subject must be respected in accordance with the principles set out below. This must be maintained even when new data is being processed or when existing data is expanded or diversified.

The processing of personal data is fair and lawful, meaning that Softline pursues a legitimate business purpose (and, where necessary, a legal basis) for processing personal data. If Softline acts as a processor, it typically relies on the controller to establish this legal basis.

Personal data processing is limited to the necessary minimum, meaning Softline collects and stores the minimum amount of personal data necessary for business purposes. If Softline acts as a processor, it must also process personal data only in accordance with the controller's instructions.

Softline does not conceal from data subjects how and why their personal data will be processed. If Softline is the processor, this information will likely be provided to data subjects by the controller.

Personal data is processed in accordance with the rights of data subjects (e.g., to access, delete, or rectify personal data). If Softline acts as a controller, it must respect and comply with any exercise of these rights, and if it is a processor, it must assist the controller in responding.

Personal data is accurate, current, and complete. If it acts as a processor, Softline will assist the controller in this regard.

Personal data is stored securely, meaning Softline applies appropriate security measures to personal data, including those processed by third parties. If Softline acts as a processor, it will be required to implement its own appropriate security measures and assist the controller in doing so.

Personal data is transferred internationally in accordance with applicable law.

Softline is responsible for and can demonstrate compliance with its obligations under applicable data privacy laws.

6. Rights of the data subject

In addition to the principles mentioned above, Softline takes into account and respects the rights of the data subject in any processing of personal data in accordance with applicable law, which may include:

- Right to information and transparency – Softline ensures that the data subject is informed about the processing of personal data.
- Right of access – Softline follows a procedure to ensure that data subjects have access to information about their processing.
- Right to rectification – regardless of the grounds for processing, data subjects have the right to request that Softline correct or supplement their data, as appropriate, based on a supplementary statement.
- Right to restrict processing – Data subjects may request Softline to restrict the processing of personal data concerning them.
- Right to erasure (“right to be forgotten”) – Data subjects have the right, in certain circumstances, to request and obtain the erasure of personal data.
- Right to data provision – Data subjects have the right to request that Softline provide a copy of their personal data to the data subject or, in some cases, a Third Party.
- Right to object to processing / Right to object to processing for direct marketing purposes: Softline does not make decisions regarding data subjects solely on the basis of automated processing.

7. Disclosure of personal data. Successors in title. Cross-border transfer.

7.1 Type and purposes of disclosure of personal data

Personal data is subject to disclosure only if the party receiving it is personally responsible for the data it has received, or only if the party receiving it will use it in accordance with instructions received from the party disclosing it.

Personal data may be disclosed for permitted purposes specified in Softline's records, in connection with Softline's operations , to comply with legal obligations, or with the consent of the data subject.

7.2 Data processors/importers

In situations where processing is to be performed by another natural or legal person on behalf of Softline , they will be the data processor/importer within the meaning of the applicable legislation and must offer sufficient guarantees for the application of adequate technical and organizational measures to protect the personal data that will be processed on behalf of Softline , while respecting the rights of data subjects.

7.3 Cross-border data transfer

A transfer to another country occurs when personal data is transferred to, visualized, or accessed by persons located in another country.

If personal data collected and stored by Softline is transferred to a person located in a country other than the one in which Softline has its registered office, the person receiving the data must guarantee a level of protection of personal data equivalent to the level provided by Softline .

8. Compliance

The DPO is the owner of this Policy. Softline strives to ensure compliance with this Policy by all employees, contractors, and consultants, including all personnel associated with third parties who may have access to any Softline resources .

Compliance with this Policy is verified through various means, including reports from available sources, internal and external audits, self-assessment, and/or feedback from the policy owner(s). Softline continuously monitors compliance with this Policy.

Any exceptions to this Policy require written approval from the Data Protection Officer.

Failure to comply with this Policy, including attempts to circumvent it, may result in disciplinary action, including termination, in accordance with local law.

Violation of the rules designed to protect Personal Data may result in administrative sanctions, fines, claims for compensation or injunctive relief and/or other civil or criminal prosecutions and remedies.

9. Contact information

Questions regarding the processing of personal data can be addressed to dataprotection.russia@softline.ru.

**Vladimir Lavrov,
General Director of Softline Russia**