Policy of privacy and personal data processing of Titan-SM, Limited company's website users

This Policy defines the procedure, terms of personal data processing of the <u>www.titansm.ru</u> Internet site users (hereinafter referred to as the Website) and establishes requirements for ensuring the users' personal data security by the Website Administration.

The policy has been developed and is implemented in accordance with the current national legislation in the personal data sphere.

Definitions

Personal data represents any information relative to directly or indirectly identified or identifiable individual person (citizen). Such information may include: full name, year, month, date and place of birth, postal address, email address, telephone number, information about family, social, property status, information about education, profession, income, health and other data.

Personal data processing represents any action with personal data performed using automation tools or without the use of such tools. Such actions may include: collection, receipt, recording, systematization, accumulation, storage, updating, modification, extraction, usage, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

User represents an individual person who receiving access to the Website functionality.

Website Administration/Company is represented by Titan-SM, Limited company. Address: Russia, the city of Omsk, Omsk region, Gubkin ave., 16, office 11.

1. The personal data processing of the Website users is performed in compliance with the following principles:

- legality;
- limitation of the personal data processing by the achievement of definite, predetermined and legitimate goals;
- prevention of the personal data processing that is incompatible with the personal data collection goals;
- prevention of the database aggregation, containing personal data, which processing is performed for purposes that are incompatible with each other.

2. In the process of the users' personal data processing, the Website Administration takes required and sufficient legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions relative to the personal data.

3. When processing the users' personal data, technical facilities and technological solutions are applied aimed at depersonalizing the personal data subjects when accessing information containing personal data of the persons directly involved in the personal data processing.

4. Users' personal data is stored on the Company's own servers in full compliance with the legal and regulatory requirements established by the current legislation.

5. The Website Administration doesn't process biometric and special categories of the users' personal data.

6. When changing their personal data, users agree that such change occurs on the same terms as the initial provision of their personal data, doesn't require additional consent, and the changed personal data is processed in the same manner as the initially provided personal data.

7. The Website Administration guarantees and ensures the complete confidentiality of the users' personal data processed when providing access to the Website functionality, except as expressly provided for by this Policy or current legislation.

8. The Website Administration processes only those personal data that are necessary for the goods' delivery to users, provision of services to users, as well as for the proper execution of contracts concluded with users.

9. The distribution of information, news and advertising mailings to the user' address is conducted by the Website Administration only if the user has given consent for receiving such mailings. At any time the user can unsubscribe from any mailing lists to which he was subscribed or otherwise gave his consent.

10. The Website Administration has the right to transfer the users' personal data to third parties in the following cases:

- The user has expressly agreed to such actions.
- The transfer is required for the performance of an agreement, concluded with the user.

• The transfer is provided for by the current legislation.

11. Users have the right at any time to demand from the Website Administration to terminate their personal data processing.