

# **Personal Data Processing Policy**

### 1. General Provisions

This Personal Data Processing Policy is prepared in accordance with the requirements of the Federal Law of July 27, 2006, No. 152-FZ "On Personal Data" and defines the procedure for processing personal data and the measures to ensure the security of personal data taken by **LLC** "**TransTechnology**" (hereinafter referred to as the "Operator").

- 1.1. The Operator considers the respect for human and civil rights and freedoms when processing their personal data, including the protection of privacy, personal, and family secrets, as its highest priority and a condition for conducting 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 may obtain about visitors to the website https://transotboy.ru.

## 2. Key Terms Used in the Policy

- 2.1. Automated processing of personal data processing of personal data using computer technology;
- 2.2. Blocking of personal data temporary suspension of personal data processing (except in cases where processing is necessary to clarify personal data);
- 2.3. Website a collection of graphical and informational materials, as well as computer programs and databases, ensuring their availability on the internet at the web address https://transotboy.ru;
- 2.4. Personal data information system a set of personal data contained in databases and the information technologies and technical means enabling their processing;
- 2.5. Depersonalization of personal data actions resulting in the impossibility of determining the ownership of personal data by a specific User or other subject of personal data without additional information;
- 2.6. Processing of personal data any action (operation) or set of actions (operations) performed with personal data, with or without automation tools, including collection, recording, systematization, accumulation, storage, updating, modification, retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, or destruction of personal data;
- 2.7. Operator a legal entity that independently or jointly with others organizes and/or processes personal data, as well as determines the purposes of processing personal data, the composition of personal data to be processed, and the actions (operations) performed with personal data;
- 2.8. Personal data any information relating directly or indirectly to an identified or identifiable User of the website https://transotboy.ru;
- 2.9. User any visitor to the website https://transotboy.ru.

#### 3. Personal Data Processed by the Operator

- 3.1. Last name, first name, and patronymic.
- 3.2. Email address.
- 3.3. Phone number.
- 3.4. Date of birth.
- 3.5. The website also collects and processes anonymized data about visitors (including "cookie" files) using the Yandex Metrica service.
- 3.6. The aforementioned data are collectively referred to as Personal Data in this Policy.

## 4. Purposes of Personal Data Processing

- 4.1. The purpose of processing the User's personal data is to inform the User by sending emails; to provide the User with access to services, information, and/or materials available on the website; and to clarify order details.
- 4.2. The Operator may also notify the User about new products and services, special offers, and various events. The User can always opt out of receiving informational messages by sending an email to the Operator at **info@transotboy.ru** with the subject line "Unsubscribe from notifications about new products, services, and special offers."
- 4.3. Anonymized User data collected through the Yandex Metrica internet statistics service are used to gather information about User actions on the website, improve the quality of the website, and enhance its content.

## 5. Legal Basis for Personal Data Processing

- 5.1. The Operator processes the User's personal data only if the User fills in and/or submits them independently through special forms on the website https://transotboy.ru. By filling out the relevant forms and/or submitting their personal data to the Operator, the User voluntarily consents to this Policy. The subject of personal data makes the decision to provide their personal data and gives consent to their processing freely, voluntarily, and in their own interest.
- 5.2. The Operator processes anonymized User data if permitted by the User's browser settings (enabling "cookie" files and JavaScript technology).

- 6. The security of personal data processed by the Operator is ensured by implementing legal, organizational, and technical measures necessary to fully comply with the requirements of current legislation on personal data protection.
- 6.1. The Operator ensures the security of personal data and takes all possible measures to prevent unauthorized access to personal data. Threats of the 1st and 2nd types are not relevant since the personal data information system is planned to operate on licensed system software within a secure information environment based on certified information security tools, which complies with the requirements established by the Government Decree of November 1, 2012, No. 1119 "On Approval of Requirements for the Protection of Personal Data During Their Processing in Personal Data Information Systems."
- 6.2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases required by applicable law.
- 6.3. If inaccuracies in personal data are identified, the User may update them independently by sending a notification to the Operator's email address **info@transotboy.ru** with the subject line "Update Personal Data."
- 6.4. The processing of personal data is unlimited in time. The User may withdraw their consent to the processing of personal data at any time by sending a notification to the Operator via email at **info@transotboy.ru** with the subject line "Withdrawal of Consent to Process Personal Data."

#### 7. Final Provisions

- 7.1. The User may obtain any clarifications regarding questions about the processing of their personal data by contacting the Operator via email at **info@transotboy.ru**.
- 7.2. This document will reflect any changes to the Operator's personal data processing policy. The Policy is valid indefinitely until replaced by a new version.
- 7.3. The current version of the Policy is freely available on the internet at https://transotboy.ru.