

Regulations on the protection of personal data of the Showroom Plus service users

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1. General provisions

1.1 This Regulation on the Protection of Users' Personal Data (hereinafter referred to as the "Regulation") is a local regulatory act of the Operator, defines the policy, procedure and conditions for processing personal data of users of the Showroom Plus application for mobile devices running iOS.

1.2 The following terms used in this document have the following meanings:

"Operator" means a person who organizes and carries out the processing of personal data, as well as determines the purposes and content of personal data processing;

"User" means an individual intending to use and/or using the Service;

"Personal Data" means any information required by the Operator in connection with the use of the Service by Users and related to a specific User;

The processing of a User's personal data is understood as any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data of a certain User;

"Service" means the Showroom Plus mobile device application for iOS.

1.3 This Regulation regulates the procedure for obtaining, processing, systematization, storage, use, transfer and disclosure of Users' personal data and fully applies to all Users.

1.4 The principles of processing Users' personal data are based on the relevant norms of the applicable legislation and include, among other things:

- legality of the purposes and methods of personal data processing, integrity and fairness;
- the reliability of personal data, their sufficiency for processing purposes, the inadmissibility of processing personal data that is excessive in relation to the purposes stated in the collection of personal data;
- the inadmissibility of combining databases containing personal data, the processing of which is carried out for purposes incompatible with each other;
- ensuring the accuracy of personal data, their sufficiency, and, if necessary, their relevance to the purposes of personal data processing. Necessary measures will be taken to delete or clarify incomplete or inaccurate data.;
- storage of personal data in a form that makes it possible to identify the subject of personal data for no longer than the purposes of personal data processing require.

1.5 All issues related to the processing of personal data that are not regulated by this Regulation are resolved in accordance with the applicable legislation in the field of personal data.

2. Processing of personal data of Users

2.1 Users' personal data is processed for the purposes of storing data about the User's lifestyle in the relevant sections of the Service, providing support when using the Service, sending advertising and marketing materials, improving the Service, receiving feedback and suggestions on the Service.

2.2 By recording data in the appropriate functionality of the Service, the User can provide the Operator with the following personal data: last name, first name, patronymic, phone number, email address, gender, age. The User confirms that the personal data is complete, accurate and up-to-date and is provided personally by the User or his legal representative.

2.3 When using the Service, the User provides additional information of his choice, if necessary to implement the functionality of the Service.

2.4 When using the Service, Users provide consent to the processing of their personal data by accepting the terms of the consent text posted on the Service.

2.6 The protection of Users' personal data from loss, unlawful and/or unauthorized access to them is ensured in accordance with the procedure provided for by applicable law.

3. Collection, storage and use of Users' personal data

3.1 The collection and storage of personal data of Users is carried out using an electronic database.

3.2 When collecting Personal Data of Users, recording, systematization, accumulation, storage, clarification (updating, modification), extraction of personal data in databases is ensured in accordance with applicable legislation.

4. Transfer of personal data

4.1 The transfer of personal data of Users is carried out only for the purposes stipulated in the consent to the processing of personal data.

4.2 All persons to whom the personal data of Users is transmitted will be warned that this data can only be used for the purposes for which it is provided. All persons receiving the User's personal data are required to strictly respect the confidentiality of such data. This provision does not apply to cases where the exchange of personal data of Users is carried out in accordance with the procedure established by law.

5. Users' rights with respect to their personal data

5.1 For the purposes of personal data protection, Users are granted the following rights:

- to receive full information about their personal data and their processing on the basis of an appropriate request;
- have free access to your personal data, except in cases where applicable law provides otherwise.;
- to request the deletion or correction of incorrect, incomplete or outdated personal data, as well as data processed in violation of the requirements of applicable law.

5.2 The User has the right to send a statement of his disagreement with the refusal to delete or correct the User's personal data in writing, indicating the reasons for his disagreement.

6. Personal data protection

6.1 In order to protect personal data from unlawful or accidental access to it, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unlawful actions with respect to personal data, appropriate legal, organizational and technical measures are taken.

6.2 Legal measures include:

- the adoption of this Regulation and its publication in the Service;
- obtaining consent to the processing of personal data;
- providing answers to User requests regarding the processing of personal data;
- bringing to justice those responsible for violating the rules of personal data processing provided for by applicable law and these Regulations.

6.3 Organizational measures include:

- appointment of a person responsible for the organization of personal data processing;
- determining the order of personal data storage in information systems, as well as the order of access to them;
- regular monitoring and analysis of the requirements of legislation and modern technologies of personal data processing in order to timely change the legal, organizational and technical measures taken in order to improve the methods and methods of processing, storing and protecting personal data.

6.4 Technical measures include:

- access control has been introduced and maintained in the Operator's office;
- actual access to electronic documents and tangible personal data carriers is provided only to a limited number of employees whose job responsibilities include processing personal data.;
- the material carriers of personal data are stored in compliance with the rules of the law in a way that excludes access to them by third parties.;
- identification and authentication of access subjects and access objects;
- access control of access subjects to access objects;
- registration of security events;
- control (analysis) of personal data security;
- protecting the virtualization environment;
- protection of the information system, its facilities, communication and data transmission systems;
- configuration management of the information system and personal data protection system.

7. Control of personal data processing

7.1 Internal control over employees' compliance with the requirements of applicable legislation and these Regulations consists in verifying compliance with the stipulated requirements, as well as assessing the validity, adequacy and

effectiveness of the measures taken. It can be conducted by a structural unit or an employee responsible for ensuring the security of personal data.

7.2 The audit of the compliance of personal data processing with the requirements of applicable legislation and these Regulations may be carried out by a third party with appropriate qualifications on a contractual basis.

7.3 Based on the results of internal control and/or audit, an assessment of the harm that may be caused to Users' personal data and the compliance of the measures taken with the identified threats is carried out. If necessary, additional measures will be introduced to protect personal data and appropriate changes will be made to this Regulation.

8. Liability for violations of the rules governing the processing and protection of Users' personal data

8.1 Persons guilty of violating the rules governing the receipt, processing and protection of personal data are subject to disciplinary, administrative, civil or criminal liability in accordance with applicable law.

8.2 The damage caused to the User as a result of violation of his rights and/or rules of personal data processing is subject to compensation in accordance with applicable law.

8.3 Based on the results of internal control and/or audit, an assessment of the harm that may be caused to Users' personal data and the compliance of the measures taken with the identified threats is carried out. If necessary, additional measures will be introduced to protect personal data and appropriate changes will be made to this Regulation.

All questions and written requests from Users can be sent to the contact email address provided in the Service.