

# Personal Data Processing Policy

## 1. General provisions

This Privacy Policy (hereinafter referred to as the Policy) applies to all information, including personal data within the meaning of applicable law (hereinafter referred to as Personal Information), which can be obtained by legal entities and individual entrepreneurs selling goods using the website <https://trimpol.com/> (hereinafter referred to as the Operator).

To ensure the use of the website <https://trimpol.com/> (hereinafter referred to as the Site) and in fulfillment of obligations for the selection, delivery of goods, as well as the provision of other services, personal information is collected by the Operator and the Operator's partners.

The personal information collected during the use of the site may vary depending on whether you use your account to access them or not. In cases where you log in to your account, the Personal Information collected about you by the Operator during your use of the site may be compared and linked to other Personal Information collected by the Operator as part of your use of your account. The Operator does not verify the Personal Information provided by you, except as provided for in this Policy, and cannot verify its accuracy.

The operator also makes efforts to protect Personal Data that is automatically transmitted during the visit of the site pages:

IP address;

information from cookies;

information about the browser (or other program that accesses the site);

access time;

visited page addresses;

referrer (address of the previous page), etc.

Disabling cookies may result in the inability to access the site.

The site collects statistics about the IP addresses of its visitors. This information is used to identify and solve technical problems, to control the correctness of operations.

Any other personal information not mentioned above (purchase history, browsers and operating systems used, etc.) is not subject to intentional disclosure, except in cases provided for by law.

## 2. Basic concepts used in Politics

2.1. Automated processing of personal data — processing of personal data using computer technology.

2.2. Blocking of personal data — temporary termination of the processing of personal data (except in cases where processing is necessary to clarify personal data).

2.3. Personal data information system — a set of personal data contained in databases and information technologies and technical means that ensure their processing.

2.4. Depersonalization of personal data — actions as a result of which it is impossible to determine, without using additional information, the identity of personal data to a specific User or other subject of personal data.

2.5. Processing of personal data — any action (operation) or a 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.

2.6. Personal data — any information related directly or indirectly to a specific or identifiable individual (subject of personal data).

2.7. Personal data authorized by the subject of personal data for dissemination – personal data, access to an unlimited number of persons to which is provided by the subject of personal data by giving consent to the processing of personal data authorized by the subject personal data for distribution in accordance with the procedure provided for by Federal Law No. 152 FZ dated 07/27/2006 "On Personal Data".

2.8. The site User (hereinafter referred to as the User or Buyer) is a person who has access to the site via the Internet and uses this site for their own purposes.

2.9. Provision of personal data — actions aimed at disclosing personal data to a certain person or a certain circle of persons.

Registering on the site or subscribing to news or placing an order is regarded as consent to the processing of User's personal data in accordance with the Operator's Policy on the Site.

Using the services of the Website/mobile application means the User's unconditional consent to this Policy and the conditions for processing his personal information specified therein; in case of disagreement with these conditions, the User must refrain from using the services.

2.10. Dissemination of personal data — any actions aimed at disclosure of personal data to an indefinite circle of persons (transfer of personal data) or familiarization with personal data of an unlimited number of persons, including disclosure of personal data in the media, posting in information and telecommunications networks or providing access to personal data in any other way

2.11. Cross-border transfer of personal data is the transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

2.12. Destruction of personal data — any actions as a result of which personal data is permanently destroyed with the inability to further restore the content of personal data in the personal data information system and/or the material carriers of personal data are destroyed.

2.13. Cookies are a small piece of data sent by a web server and stored on the user's computer, which the web client or web browser sends to the web server each time in an HTTP request when trying to open a page of the corresponding site.

2.14. IP address is a unique network address of a node in a computer network built using the IP protocol.

### 3. Basic rights and obligations of the Operator

3.1. The Operator has the right to:

- receive reliable information and/or documents containing personal data from the subject of personal data;

- in case of withdrawal by the subject of personal data of consent to the processing of personal data, as well as sending a request to terminate the processing of personal data, the Operator has the right to continue processing personal data without the consent of the subject of personal data if there are grounds specified in the Law on Personal Data;

- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations provided for by the Law on Personal Data and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Law on Personal Data or other federal laws.

- to entrust the processing of personal data to another person with the consent of the personal data subject, unless otherwise provided by federal law, on the basis of an agreement concluded with this person (hereinafter referred to as the Operator's order). The person processing personal data on behalf of the Operator is obliged to comply with the principles and rules of personal data processing provided for in this Policy and Federal Law No. 152-FZ dated 07/27/2006 "On Personal Data".

- transfer the Buyer's personal information (including organizations that record, systematize, accumulate, clarify, store, extract, directly send special offers, information about new products and promotions to the Buyer, process requests and appeals, as well as destroy personal information) to third parties in the following cases:

- The Buyer has expressed his consent to the processing of personal data in the manner specified in p. 2.9. of this Policy regarding the processing of personal data;
- The transfer is necessary as part of the Buyer's use of a certain Service or to provide a service to the Buyer, fulfill obligations under the Contract;
- The transfer is provided for by Russian or other applicable legislation within the framework of the procedure established by law.

### 3.2. The Operator is obliged to:

- to provide the subject of personal data, at his request, with information concerning the processing of his personal data;
- organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;
- respond to requests and requests from personal data subjects and their legal representatives in accordance with the requirements of the Law on Personal Data;
- to inform the authorized body for the protection of the rights of personal data subjects at the request of this body of the necessary information within 30 days from the date of receipt of such a request;
- to publish or otherwise provide unrestricted access to this Policy regarding the processing of personal data;
- take legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other illegal actions in relation to personal data;
- to stop the transfer (distribution, provision, access) of personal data, to stop processing and destroy personal data in the manner and in the cases provided for by the Law on Personal Data;
- perform other duties provided for by the Law on Personal Data.

## 4. Basic rights and obligations of personal data subjects

### 4.1. Personal data subjects have the right to:

- receive information regarding the processing of his personal data, except in cases provided for by federal laws. The information is provided to the personal data subject by the Operator in an accessible form, and it should not contain personal data related to other personal data subjects, except in cases where there are legitimate grounds for disclosure of such personal data. The list of information and the procedure for obtaining it is established by the Law on Personal Data;
- to require the operator to clarify his personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing, as well as to take measures provided for by law to protect their rights;
- to put forward a condition of prior consent when processing personal data in order to promote goods, works and services on the market;
- to revoke consent to the processing of personal data, as well as to send a request to terminate the processing of personal data;
- to appeal to the authorized body for the protection of the rights of personal data subjects or in court against illegal actions or inaction of the Operator during the processing of his personal data;
- to exercise other rights provided for by the legislation of the Russian Federation.

### 4.2. The subjects of personal data are obliged to:

- provide the Operator with reliable data about themselves;
- inform the Operator about the clarification (updating, modification) of their personal data.

4.3. Persons who have provided the Operator with false information about themselves or information about another personal data subject without the latter's consent are liable in accordance with the legislation of the Russian Federation.

## 5. Principles of personal data processing

5.1. The processing of personal data is carried out on a lawful and fair basis.

5.2. The processing of personal data is limited to the achievement of specific, predetermined and legitimate goals. Processing of personal data incompatible with the purposes of personal data collection is not allowed.

5.3. It is not allowed to combine databases containing personal data, the processing of which is carried out for purposes incompatible with each other.

5.4. Only personal data that meet the purposes of their processing are subject to processing.

5.5. The content and volume of the processed personal data correspond to the stated purposes of processing. Redundancy of the processed personal data in relation to the stated purposes of their processing is not allowed.

5.6. When processing personal data, the accuracy of personal data, their sufficiency, and, if necessary, relevance in relation to the purposes of personal data processing are ensured. The Operator takes the necessary measures and/or ensures that they are taken to delete or clarify incomplete or inaccurate data.

5.7. The storage of personal data is carried out in a form that allows determining the subject of personal data, no longer than the purposes of personal data processing require, unless the period of personal data storage is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor. The processed personal data is destroyed or depersonalized upon achievement of the processing goals or in case of loss of the need to achieve these goals, unless otherwise provided by federal law.

5.8. In case of cross-border transfer, the Operator is obliged to ensure that the foreign state to whose territory it is intended to transfer personal data provides adequate protection of the rights of personal data subjects, before the beginning of such a transfer.

5.9. Cross-border transfer of personal data on the territory of foreign states that do not adequately protect the rights of personal data subjects may be carried out in the following cases:

the written consent of the personal data subject to the cross-border transfer of his personal data;  
execution of an agreement to which the subject of personal data is a party.

## 6. Purposes of personal data processing.

The Operator performs automated, non-automated, mixed processing of personal data in the following ways: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction for the following purposes:

- providing the most complete information about products offered for purchase based on the customer's experience.
- identification of the party within the framework of contracts with the Operator, placing orders
- processing and receiving payments from the Buyer;
- delivery of the goods to the Buyer;
- providing the Buyer with effective customer support;
- communication with the Buyer, including sending notifications, requests and information related to the sale of goods, provision of services, as well as processing requests and requests from Buyers;
- informing the Buyer about the events and promotions held by the Operator;

- for sending news reports.
- conclusion and execution of a retail sale agreement concluded between the Operator, the Operator's partners and the Buyer;
- sending notifications to the Buyer, advertising information, as well as information about current promotions on goods sold by the Operator through the online store <https://trimpol.com/>;
- publishing a review left by the Buyer on the website of the online store, as well as transmitting the text of the review to third-party resources for advertising purposes;
- sending personal offers from the Operator to the Buyer;
- informing the Buyer about the status of the order made;
- for any other purposes directly or indirectly related to the execution of the contract of accession to the public offer;
- conducting surveys, statistical and marketing research, processing the information received, including with the possibility of commercial use of the results of these surveys and research.

## 7. Terms of personal data processing

7.1. The processing of personal data is carried out with the consent of the personal data subject to the processing of his personal data.

7.2. The processing of personal data is necessary to achieve the goals provided for by an international agreement of the Russian Federation or by law, to carry out the functions, powers and duties assigned to the operator by the legislation of the Russian Federation.

7.3. The processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another body or official to be executed in accordance with the legislation of the Russian Federation on enforcement proceedings.

7.4. The processing of personal data is necessary for the performance of an agreement to which the personal data subject is a party or beneficiary or guarantor, as well as for the conclusion of an agreement on the initiative of the personal data subject or an agreement under which the personal data subject will be the beneficiary or guarantor.

7.5. The processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator or third parties, or to achieve socially significant goals, provided that the rights and freedoms of the personal data subject are not violated.

7.6. Personal data is processed, access to which is provided to an unlimited number of persons by the subject of personal data or at his request (hereinafter referred to as publicly available personal data).

7.7. Personal data subject to publication or mandatory disclosure in accordance with federal law is processed.

## 8. The procedure for the collection, storage, transfer and other types of processing of personal data.

The security of personal data processed by the Operator is ensured through the implementation of legal, organizational and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.

8.1. The Operator ensures the safety of personal data and takes all possible measures to exclude access to personal data of unauthorized persons.

8.2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of current legislation or if the subject of personal data has given consent to the Operator to transfer data to a third party to fulfill obligations under a civil contract.

The User agrees that the Operator has the right to transfer personal data to third parties, in particular, courier services, postal organizations, telecommunication operators, solely for the purpose of fulfilling User requests made on the site.

8.3. In case of inaccuracies in personal data, the User can update them independently by sending a notification to the Operator to the Operator's e-mail address

[info@trimpol.com](mailto:info@trimpol.com)

8.4. The period of processing of personal data is determined by the achievement of the purposes for which personal data was collected, unless another period is provided for by the contract or current legislation. The User can withdraw his consent to the processing of personal data at any time by sending a notification to the Operator via e-mail to the Operator's e-mail address

[info@trimpol.com](mailto:info@trimpol.com)

8.5. All information collected by third-party services, including payment systems, means of communication and other service providers, is stored and it is processed by the specified persons (Operators) in accordance with their User Agreement and Privacy Policy. The subject of personal data and/or with the specified documents. The Operator is not responsible for the actions of third parties, including the service providers specified in this paragraph.

8.6. The prohibitions established by the subject of personal data on the transfer (except for granting access), as well as on the processing or conditions of processing (except for obtaining access) of personal data allowed for distribution, do not apply in cases of processing personal data in the state, public and other public interests defined by the legislation of the Russian Federation.

8.7. The Operator ensures the confidentiality of personal data when processing personal data.

8.8. The Operator stores personal data in a form that allows determining the subject of personal data for no longer than the purposes of processing personal data require, unless the period of storage of personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor.

8.9. The condition for the termination of personal data processing may be the achievement of the purposes of personal data processing, the expiration of the consent of the personal data subject, the withdrawal of consent by the personal data subject or the requirement to terminate the processing of personal data, as well as the identification of unlawful processing of personal data.

## 9. List of actions performed by the Operator with the received personal data

9.1. The Operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes and destroys personal data.

9.2. The Operator performs automated processing of personal data with or without receiving and/or transmitting the information received via information and telecommunications networks.

9.3. The Operator has the right to entrust the processing of the Buyer's personal data to another person on the basis of an agreement concluded with this person, the mandatory conditions of which are compliance by this person with the principles and rules of personal data processing provided for by the Federal Law, the confidentiality of personal data law, the fulfillment of the requirements provided for in part 5 of Article 18 and Article 18.1 of Federal Law No. 152-FZ, the requirements for the protection of processed personal data, the requirements for notifying the operator of the cases provided for in part 3.1 of Article 21 of Federal Law No. 152-FZ and ensuring by this person the security of personal data during their processing in accordance with the legislation of the Russian Federation, and also has the right to receive personal data of the personal data subject from third parties.

## 10. Confidentiality of personal data

The operator and other persons who have gained access to personal data are obliged not to disclose or distribute personal data to third parties without the consent of the personal data subject, unless otherwise provided by federal law.

## 11. Final provisions

11.1. The User can receive any clarifications on issues of interest related to the processing of his personal data by contacting the Operator via e-mail

[info@trimpol.com](mailto:info@trimpol.com)

11.2. This document will reflect any changes to the Operator's personal data processing policy. The policy is valid indefinitely until it is replaced by a new version.

11.3. The current version of the Policy is freely available on the Internet at <https://trimpol.com/privacy-policy>