

## **Data Privacy Policy of Mediteran LLC**

Legal address: 4th Tverskaya-Yamskaya street, 2/11, build.2, sp.1, pl.4, off.6, 125047 Moscow, Russia

City of Moscow

August 1, 2020

This Data Privacy Policy (hereinafter referred to as the Privacy Policy) applies to all information on the website <https://mediteran.ru>, located on the domain name [www.mediteran.ru](http://www.mediteran.ru), which can be obtained about the User while using the website, software and products of the website.

### **1. TERMS AND DEFINITIONS**

1.1. The following terms are used in this Privacy Policy:

1.1.1. "Website Administration (hereinafter referred to as the Website Administration)" shall mean employees authorized to perform website management, acting on behalf of Mediteran LLC, who organize and (or) process personal data, and determine the purposes of processing personal data, structure of personal data subject to processing, and actions (operations) performed with personal data.

1.1.2. "Personal data" shall mean any information related directly or indirectly to an identified or identifiable individual (subject of personal data).

1.1.3. "Processing of personal data" shall mean any action (operation) or a set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion and destruction of personal data.

1.1.4. "Confidentiality of personal data" shall mean the mandatory requirement for the Operator or other person who has gained access to personal data not to allow their dissemination without the consent of the subject of personal data or on other legal grounds.

1.1.5. "Website User (hereinafter referred to as the User)" means a person who has access to the Website via the Internet and uses the Website.

1.1.6. "Cookies" shall mean a small unit 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 in an HTTPS request each time it tries to open a page of the corresponding website.

1.1.7. "IP-address" shall mean a unique node network address in the computer network built using the IP protocol.

### **2. GENERAL PROVISIONS**

2.1. By using this website, the User accepts this Privacy Policy and the terms and conditions of processing of the User's personal data.

2.2. In case of disagreement with the terms of the Privacy Policy, the User shall terminate using the website.

2.3. This Privacy Policy applies only to the website Name. The website does not control and is not responsible for third-parties' websites which the User can access upon clicking on the links available on the website.

2.4. The website administration does not verify the accuracy of personal data provided by the Website User.

### **3. SCOPE OF THE PRIVACY POLICY**

3.1. This Privacy Policy establishes the obligations of the Website Administration not to disclose and ensure the protection of the confidentiality of personal data provided by the User at the request of the Website Administration when registering on the website or when filling out various forms.

3.2. Personal data allowed for processing under this Privacy Policy is provided by the User by filling out the feedback form on the Website <https://mediteran.ru> in all sections and includes the following information:

- 3.2.1. Surname, first name, patronymic (middle name) of the User
- 3.2.2. User's contact phone number
- 3.2.3. Email address
- 3.3. The website protects Data automatically transmitted during the viewing of ad units and when visiting pages on which a statistical system script ("pixel") is installed:
  - IP address
  - Information from cookies
  - Information about the browser (or other software that provides access to the advertising display)
  - Access time
  - Address of the page on which the ad unit is located
  - Referrer (address of the previous page)
- 3.3.1. Deactivation of cookies may result in the inability to access parts of the website that require authorization.
- 3.3.2. The Website collects statistics about the IP addresses of its visitors. This information is used to identify and solve technical issues.
- 3.4. Any other personal information not specified above (visit history, browsers and operating systems used, etc.) is subject to reliable storage and non-dissemination, except as stipulated in clauses. 5.2. and 5.3. of this Privacy Policy.

#### **4. PURPOSES OF COLLECTING PERSONAL USER INFORMATION**

- 4.1. The User's personal data may be used by the Website Administration for the following purposes:
  - 4.1.1. Identifying the User registered on the website to register inquiries.
  - 4.1.2. Providing the User with access to the personalized resources of the Website.
  - 4.1.3. Providing feedback to the User, including sending notifications, requests regarding the use of the Website, the provision of services as well as the processing of User inquiries and applications.
  - 4.1.4. Determining the location of the User to ensure security and prevent fraud.
  - 4.1.5. Confirming the accuracy and completeness of personal data provided by the User.
  - 4.1.6. Creating an account if the User has agreed to account creation.
  - 4.1.7. Providing the User with effective customer and technical support in case of any problems related to the use of the Website.
  - 4.1.8. Providing the User, if consent has been granted, with special offers, newsletters and other information on behalf of the website or on behalf of the partners of the website.
  - 4.1.10. Receiving marketing materials with the consent of the User.
  - 4.1.11. Providing the User with access to the websites or services of partners in order to receive products, updates and services.

#### **5. METHODS AND TERMS OF PROCESSING PERSONAL DATA**

- 5.1. User's personal data are processed without any time limit, in any legal way, including in personal data information systems using automation tools or without using such tools.
- 5.2. The User agrees that the Website Administration has the right to transmit personal data to third parties, in particular, courier services, postal organizations and telecommunication operators, solely for the purpose of providing services to the User registered on the Website <https://mediteran.ru>.
- 5.3. The User's personal data may be transmitted to the authorized government bodies of the Russian Federation only on the grounds and in the manner established by the legislation of the Russian Federation.
- 5.4. In case of loss or disclosure of personal data, the Website Administration notifies the User of the loss or disclosure of personal data
- 5.5. The website administration takes the necessary organizational and technical measures to protect the User's personal information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution as well as from other illegal actions of third parties.
- 5.6. The website administration jointly with the User takes all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the User's personal data.

## **6. OBLIGATIONS OF THE PARTIES**

### **6.1. The user undertakes to:**

- 6.1.1. Provide information about the personal data necessary to use the Website.
- 6.1.2. Update and supplement the information about personal data in case of changes to this information.

### **6.2. The website administration is obliged to:**

- 6.2.1. Use the information received solely for the purposes specified in clause 4 of this Privacy Policy.
- 6.2.2. Ensure that confidential information is kept secret, not disclose it without the prior written permission of the User, and not sell, exchange, publish, or disclose in other possible ways the transmitted personal data of the User, with the exception set forth in cl. 5.2. and 5.3. of this Privacy Policy.
- 6.2.3. Take precautions to protect the confidentiality of the User's personal data in accordance with the standard procedure used to protect this kind of information in customary business practices.
- 6.2.4. Block personal data related to the User from the moment a request is sent by the User or their legal representative or the authorized body for the protection of the rights of data subjects for the period of verification, in case inaccurate personal data or illegal actions are discovered.

## **7. LIABILITY OF THE PARTIES**

- 7.1. The Website Administration, which failed to meet its obligations, is liable for documented losses incurred by the User in connection with the unlawful use of personal data, in accordance with the legislation of the Russian Federation, with the exception of the cases stipulated in clauses 5.2., 5.3. and 7.2. of this Privacy Policy.
- 7.2. In case of loss or disclosure of Confidential Information, the Website Administration will not be liable if this confidential information:
  - 7.2.1. became publicly available before its loss or disclosure.
  - 7.2.2. was received from a third party before it was received by the Website Administration.
  - 7.2.3. was disclosed with the consent of the User.

## **8. DISPUTE RESOLUTION**

- 8.1. Before going to court with a claim for disputes arising from the relationship between the Website User and the Website Administration, it is mandatory to submit a claim (a written proposal for the voluntary settlement of the dispute).
- 8.2. The recipient of the claim, within 30 calendar days from the date of receipt of the claim, shall notify the claimant in writing about the results of the consideration of the claim.
- 8.3. If an agreement is not reached, the dispute shall be referred to the court in accordance with the legislation of the Russian Federation currently in force.
- 8.4. The legislation of the Russian Federation currently in force applies to this Privacy Policy and the relationship between the User and the Website Administration.

## **9. SUPPLEMENTARY TERMS**

- 9.1. The Website Administration shall have the right to make changes to this Privacy Policy without the consent of the User.
- 9.2. The new Privacy Policy enters into force upon publication on the Website, unless otherwise stated in the new edition of the Privacy Policy.
- 9.3. All suggestions or questions related to this Privacy Policy should be reported to <https://setra-food.com>.
- 9.4. The currently valid version of the Privacy Policy is published at <https://setra-food.com>.

Updated on August 1, 2020