Personal data processing policy

1. General provisions

This personal data processing policy has been drawn up in accordance with the requirements of Federal Law No. 152-FZ "On Personal Data" of 27 July 2006 and determines the procedure for processing personal data and the measures taken by LLC GRAND-VINO (the "Operator") to ensure the security of personal data.

1.1. The Operator considers the observance of human and civil rights and freedoms, including the right to privacy of personal life and personal and family secrets, to be its most important goal and a condition of its activities when processing personal data.

This Operator's personal data processing policy (the "Policy") applies to all information that the Operator may obtain about visitors to the website https://burnier.vin/

- 2. The main terms used in the Policy
- 2.1. "Automated personal data processing" means the processing of personal data using computing technology.
- 2.2. "Blocking of personal data" means the temporary suspension of personal data processing (except when processing is necessary to clarify personal data).
- 2.3. "Website" means a set of graphical and information materials, as well as computer programmes and databases that provide access to such materials on the Internet at https://burnier.vin/
- 2.4. "Personal data information system" means a collection of personal data stored in databases and software and hardware used for the processing thereof.
- 2.5. "Anonymisation of personal data" means actions that make it impossible to identify personal data as related to a certain User or other data subject without the use of additional information.
- 2.6. "Personal data processing" means any action (operation) or a set of actions (operations) performed on personal data with or without the use of automated technology, including the collection, recording, systematisation, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), anonymisation, blocking, deletion and destruction of personal data.
- 2.7. "Operator" means a state or municipal authority, legal entity or individual, that, alone or with others, organises and/or implements the processing of personal data and determines the purpose of the personal data processing, the scope of personal data to be processed and the actions (operations) performed with personal data.
- 2.8. "Personal data" means any information related directly or indirectly to a specific or identifiable User of the website https://burnier.vin/
- 2.9. "User" means any visitor to the website https://burnier.vin/
- 2.10. "Provision of personal data" means actions aimed at the disclosure of personal data to a specific third party or a group of thirds parties.
- 2.11. "Dissemination of personal data" means any actions aimed at the disclosure of personal data to an indefinite number of third parties (transfer of personal data) or making personal data available to an unlimited number of third parties, including through the publication of personal data in the media, in information and telecommunication networks or otherwise providing access thereto.
- 2.12. "Cross-border transfer of personal data" means the transfer of personal data to the territory of a foreign state, to a foreign state authority, a foreign individual or legal entity.
- 2.13. "Destruction of personal data" means any actions to delete personal data in a personal data information system without the possibility of recovery and/or actions to physically destroy media containing the personal data.
- 2.14. The Operator may process the following personal User data:
- 2.15. Full name;
- 2.16. Email address;
- 2.17. Telephone numbers;
- 2.18. Year, month, date, and place of birth;
- 2.19. Anonymised data is also collected and processed from website visitors (including through cookie files) using web analytics services (Yandex Metrica, Google Analytics, etc.).
- 2.20. The above-mentioned data is hereinafter collectively referred to as "Personal Data".
- 3. The purposes of processing personal data

- 3.1. The purposes of processing a User's personal data are to provide information to the User via email, provide the User with access to services, information and/or materials on the website.
- 3.2. The Operator may also send the User notifications about new products and services, special offers and various events. The User may, at any time, opt out of receiving notification messages by sending the Operator an email to info@grand-vino.ru with the wording "Opt out of notifications about new products, services, and special offers".
- 3.3. Anonymised User data collected through internet statistics services is used to collect information about the User's actions on the website and to improve the quality of the website and its content.
- 4. Legal basis for processing personal data
- 4.1. The Operator shall process the User's personal data only if the User provides it themselves by filling in and/or submitting special forms hosted on the website https://burnier.vin/ By filling in these forms and/or sending their personal data to the Operator, the User expresses their consent to this Policy.
- 4.2. The Operator shall process the User's anonymised data if this option is enabled in the User's browser settings (cookies and JavaScript are enabled).
- 5. Procedures for the collection, storage, transfer, and other forms of personal data processing The security of personal data processed by the Operator shall be ensured by regulatory, organisational, and technical measures required for full compliance with the applicable laws on the protection of personal data.
- 5.1. The Operator shall protect personal data and make all efforts to prevent unauthorised access thereto.
- 5.2. The User's personal data may not, under any circumstances, be transferred to third parties, unless so required by the applicable laws.
- 5.3. If any inaccuracies are identified in the personal data, the User may update the details by sending notification with the wording "Update personal data" to the Operator's email address info@grand-vino.ru
- 5.4. The period for processing personal data is unlimited. The User may, at any time, withdraw their consent to the processing of their personal data by sending notification by email to the Operator's email address <u>info@grand-vino.ru</u> with the wording "Withdrawal of consent for personal data processing" to the Operator's email address.
- 6. Cross-border transfers of personal data
- 6.1. Prior to starting any cross-border transfer of personal data, the Operator must make sure that the foreign country where the personal data is being transferred to provides reliable protection of the rights of personal data subjects.
- 6.2. The cross-border transfer of personal data to foreign countries that do not meet the above requirements may only be performed with the written consent of the personal data subject to the cross-border transfer of their personal data and/or under an agreement to which the personal data subject is a party.
- 7. Final provisions
- 7.1. The User may obtain any clarifications on matters pertaining to the processing of their personal data by sending a request to the Operator's email address info@grand-vino.ru
- 7.2. This document shall reflect any changes introduced by the Operator to the Personal Data Processing Policy. The Policy shall be valid for an unlimited period until replaced by a new version.
- 7.3. The current version of the Policy is publicly available online at https://burnier.vin/