

APPROVED BY
I. V. Vartik, Director General
Order No. 10 of September 7, 2019



I R E N V A R T I K

Exclusively

PERSONAL DATA PROCESSING POLICY
on the website www.irenvartik.ru,
www.irenvartik.com VARTIK FASHION HOUSE LLC

Kazan - 2019

CONSENT TO PERSONAL DATA PROCESSING

1. This text of Consent to Personal Data Processing was developed in accordance with the Constitution of the Russian Federation, the Federal Law of 27.07.2006 No. 152-FZ On Personal Data, Federal Law of 27.07.2006 No. 149-FZ On Information, Information Technologies and Information Protection, and other legal acts.
2. When providing personal data via the website www.irenvartik.ru www.irenvartik.com, including any sections (subsections) of the website, by filling in the online application fields, the Personal Data Owner (User) voluntarily accedes to this Consent, and also voluntarily expresses his/her consent to the processing of Personal Data and its transfer to the Personal Data Processing (Vartik Fashion House LLC, OGRN¹: 1177746548100, TIN: 7707386030, KPP²: 770701001, legal address: 2 Okhotny Ryad street, Suite I, Room 63, Moscow, 109012, Russia), which owns the website www.irenvartik.ru www.irenvartik.com.
3. By filling out the application form on the website www.irenvartik.ru , www.irenvartik.com, Personal Data Owner (User) confirms that:
 - a) he/she has read and familiarized him/herself in full with this Consent to Data Processing;
 - b) the content and text of this Consent is clear and understandable;
 - c) all data provided by the Personal Data Owner belongs to him/her personally;
 - d) consent is given voluntarily and by his/her own will.
 - e) by clicking on links (buttons) under conventional captions: "Request a callback", "Create an account", "Subscribe", "Participate in the program" the Personal Data Owner voluntarily accedes to the terms of this Consent, and also voluntarily expresses his/her consent to the processing of Personal Data;
 - f) he/she gives consent to personal data processing without any reservations or restrictions.
4. Processing of Personal Data of Personal Data Owners (Users) is performed on the basis of the principles specified in Article 5 of the Federal Law No. 152-FZ of July 27, 2006 On Personal Data.
5. The Consent is deemed accepted since the moment of filling out the application form under conditional captions: "Request a callback", "Create an account", "Subscribe", "Participate in the program", and clicking the "Submit" link (button) on any page of the website www.irenvartik.ru, www.irenvartik.com.
6. The Personal Data Operator processes Personal Data, i.e. performs any actions (operations) or a set of actions (operations) performed with or without the use of automation tools in respect of personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of personal data. The Personal Data Operator performs automated and non-automated processing of Personal Data.
7. The Personal Data Operator processes personal data within a certain period of time. The duration of the Personal Data processing period is determined by the achievement of the purpose of the Personal Data processing, except for cases when the Personal Data Owner refuses to process

¹ OGRN - Primary State Registration Number

² KPP - Code of Reason for Registration

personal data and sends a document with the request to stop the processing of personal data or destroy the latter.

8. When filling out the application form on the website www.irenvartik.ru www.irenvartik.com, the Personal Data Owner (User) voluntarily submits the following personal data to the Personal Data Operator:

- 8.1. Surname, first name and patronymic name;
- 8.2. mobile and/or landline phone number;
- 8.3. email address (e-mail).

9. The purpose of personal data processing is to store and use personal data, including:

- 9.1. answering the Users' requests and questions;
- 9.2. maintaining reports and statistics;
- 9.3. providing the Users with analytical and/or other promotional materials;
- 9.4. administering the web site www.irenvartik.ru www.irenvartik.com;
- 9.5. promotion of own advertising services;
- 9.6. entering into a contract with the User.

10. In accordance with the Federal Law No. 152-FZ of July 27, 2006 On Personal Data as well as other laws and regulations governing the personal data processing procedure, the Personal Data Owner has the right to revoke his/her consent to the processing of Personal Data by submitting a written request to the Operator with the indication of the data specified in Article 14 of the Federal Law No. 152-FZ On Personal Data at the following address: 2 Okhotny Ryad street, Suite I, Room 63, Moscow, 109012, Russia, Vartik Fashion House LLC.

11. The Personal Data Operator takes measures of technical, organizational and legal nature for the purpose of ensuring the security (protection) of personal data to prevent unauthorized access by third parties.

12. The User's personal data shall not be transferred to third parties, except in cases established by law.

13. This Consent to Data Processing may be changed unilaterally at any time. When making changes, the current version of the Consent shall be indicated.

14. This Consent is freely available for information purposes on the website www.irenvartik.ru, www.irenvartik.com.