# **Personal Data Privacy Policy**

This Personal Data Privacy Policy (hereinafter –the Privacy Policy) applies to all the information about the User which can be obtained by <a href="https://goldenseed.ru/">https://goldenseed.ru/</a> (hereinafter – the Website) while using the said website.

We use your personal data for providing access to and improvement of the Website. By using the Website you give your consent to collection and use of the information pursuant to this Privacy Policy.

#### 1. General Provisions

- 1.1. Your personal data is used by Limited Liability Company LAVE located at: 8, Tolstogo Sq., floor 3, office 28, Rostov-on-Don, 344037, Russia (hereinafter we) to ensure your access to all the features and benefits of the Website.
- 1.2. This Privacy Policy sets out how we collect and use, process and protect your personal information, including from unauthorized access and disclosure, when you use the accesses, features and benefits of the Website, and stipulates the options available to you in connection with our use of your personal information.

### 2. This Privacy Policy

- 2.1. This Privacy Policy applies during registration and actual use of the Website.
- 2.2. By providing accesses, features and benefits of the Website, we, acting in a reasonable manner and in good faith, assume that you:
  - 2.2.1. have all necessary rights to get registered on and use the Website;
  - 2.2.2. provide reliable information about yourself to the extent required for using the Website;
  - 2.2.3. have read and accepted this Privacy Policy;
- 2.3. We do not verify the User information obtained from you unless such verification is necessary to fulfill our obligations to you. However, we assume that you provide true and sufficient information about yourself and update it in a timely manner.

2.4. This Privacy Policy applies as in force at the time of its actual use.

# 3. Information Processing on the Website

- 3.1. The Website has been developed with due regard to the security and confidentiality of the users.
- 3.2. The protection of information on the Website is ensured by security features built into the hardware and software of your device, as well as by using data encryption methods and algorithms.
- 3.3. For the purpose to fulfill the agreement between us and provide you with accesses, features and benefits of the Website at your registration on the Website we collect, store and use your data (hereinafter processing) pursuant to the laws of the Russian Federation.
- 3.4. Through the collection, storage and processing of data, we maintain and improve the operation of the Website and ensure the security of our users.
- 3.5. The reasons for the collection and processing of the information we collect and/or may collect when you use the Website are described in detail below.

#### **Information collected:**

- User Name
- Phone number
- E-mail
- Usage data

This information is the minimum data required for your registration on the Website.

After you register, we continue to use this information to support and administer the Website.

## 4. Purposes of Data Processing

- 4.1. The purposes of processing your data include as follows:
  - 4.1.1. support and administration of the Website;
  - 4.1.2. providing you with accesses, features and benefits of the Website;
  - 4.1.3. improvement of features and benefits of the Website to serve the interests of all the Website users;
  - 4.1.4. understanding how you interact with the Website;
  - 4.1.5. ensuring proper protection of your data on the Website;
  - 4.1.6. compliance with any contractual, legal or regulatory obligations stipulated by the laws of the Russian Federation.
- 4.2. In all cases, your personal data will be processed solely for the purposes set out in clause 4.1. of this Privacy Policy, unless otherwise set out in our User Agreement.
- 4.3. Your personal information may also be processed if it is required by law enforcement or regulatory authorities, bodies or agencies on legal grounds, or it is necessary for its protection or fulfillment of legal requirements. We will not delete personal information if it is relevant to an investigation or dispute. Information will continue to be kept until such matters are fully resolved and/or for as long as is required and/or permitted under the laws of the Russian Federation.
- 4.4. Please be informed that if you refuse to provide your consent to the data processing or fail to provide the data required to maintain and administer the Website, you will not be able to access or register on the Website.
- 4.5. If we need to continue processing your data for any other purpose in accordance with the provisions set out in this Privacy Policy, we will provide you with details of that additional purpose before we commence processing.
- 4.6. In order to fulfill the agreement between us and to provide you with the accesses, features and benefits of the Website, we may send you some notifications (e.g. emails, SMS) to obtain your feedback (e.g. surveys) via our websites, tools and/or through third parties. We may collect, store and accumulate such data.

## 5. Data Sharing

5.1. We do not share your personal data with any third parties except as otherwise explicitly required by this Privacy Policy.

#### 6. Retention Periods

- 6.1. We will retain your personal information for as long as necessary to fulfill the purposes for which the data was collected, depending on the legal basis under which the data was obtained and/or within the period stipulated by any additional legal/regulatory obligations set forth in accordance or under the laws of the Russian Federation.
- 6.2. If you delete your account we will retain your data on our electronic media for the period required and established by applicable laws of the Russian Federation.

# 7. Your Rights

- 7.1. You have the following rights with respect to your personal information:
  - 7.1.1. the right to unhindered access to your personal information free of charge by viewing the data on the Website;
  - 7.1.2. other rights as stipulated by the laws of the Russian Federation.

#### 8. Security Measures

- 8.1 We take technical, organizational and legal measures, including encryption where necessary, to ensure that your personal data is protected against unauthorized or accidental access, destruction, alteration, blocking, copying, dissemination and other unlawful acts.
- 8.2 Your data is stored exclusively on electronic media and processed using automated systems. Information is mostly processed automatically without access to it by our employees and contractors. When we grant such access, it is only to the extent necessary for these persons to perform their official duties or contractual obligations to us. While doing so these persons shall comply with security requirements. All employees/contractors observe internal policies and procedures

related to the information processing in order to protect and ensure the confidentiality of data. These persons also comply with all technical and organizational security measures stipulated by the laws of the Russian Federation and required for the protection of information.

# 9. Changes to the Privacy Policy

- 9.1. We may from time to time amend and/or update this Privacy Policy. In case of changes to this Privacy Policy its updated version will be published on this page. We encourage you to review this page regularly to keep up to date with our information practices and any changes to these practices.
- 9.2. You may refuse to accept amendments and additions to this Privacy Policy. Such refusal will constitute your waiver to use the Website and to exercise any and all rights previously granted to you. If you do not provide your consent to the terms and conditions of this Privacy Policy, you shall immediately stop using the Website.

#### 10. Contact Us

- 10.1. If you have any questions regarding the processing of information while using the Website, please do not hesitate to contact us by post at 8, Tolstogo Sq., floor 3, office 28, Rostov-on-Don, 344037, Russia, or by email to <a href="mailto:info@lave.tech">info@lave.tech</a>. In order for us to process your request efficiently, please refer to this Privacy Policy.
- 10.2. Personal data and other information about you may not be used without your consent for any purpose other than to respond to a request, except as expressly stipulated by the laws of the Russian Federation.