PRIVACY POLICY

1. GENERAL PROVISIONS

- 1.1 This Privacy Policy (hereinafter, the "Privacy Policy") covers any information about users of our services that may include personal data as defined by applicable laws and regulations (hereinafter, "Personal data"), and is intended to determine the procedure for processing personal data and measures to ensure the security of personal data about individuals that Innovative Ecological Platform LLC (referred to as "Ecoplatform"), a company incorporated under Russian law, (TIN (tax identification number) 7731392620, PSRN (primary state registration number) 5177746232330) may obtain.
- **1.2** This Policy applies to all personal data that Ecoplatform receives from Website users (hereinafter referred to as Users, the User). The transfer of personal information by the Subject of personal data means the unconditional consent of the Subject of personal data with the terms of the Privacy Policy and the terms of processing of their personal data specified therein.
- **1.3** In case of disagreement with the terms of the Policy, the User must immediately stop any use of the Sites.
- **1.4** Using the Sites and its services via a web browser that accepts data from cookies means expressing the consent of the Subject of personal data that Ecoplatform can collect and process data from cookies in order to improve the Site, its content, and its functionality. Disabling and/or blocking by the Subject of personal data the option of the web browser to receive data from cookies means that the use of the Sites may be limited for the Subject of personal data, in particular, some of its functions.
- **1.5** Ecoplatform does not verify the accuracy of the personal information provided by the Subject of personal data.

2. BASIC CONCEPTS

- **2.1** Personal data any information relating directly or indirectly to a specific or identifiable Subject of personal data.
- **2.2** Website/ Site a set of graphic and informational materials, as well as computer programs and databases that ensure their availability on the website on the Internet at: https://ecoplatform.tech / https://ecoplatform.ru and on all subdomains created on their basis.
- **2.3** 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 (update, change);
 - extraction;
 - usage:
 - transfer (distribution, provision, access);
 - depersonalization;
 - blocking;
 - removal;
 - destruction of personal data.

- 2.4 Automated processing of personal data processing of personal data using computer technology.
- 2.5 Dissemination of personal data actions aimed at disclosure of personal data to an indefinite circle of persons.
- 2.6 Provision of personal data actions aimed at disclosure of personal data to a certain person or a certain circle of persons.
- 2.7 Blocking of personal data temporary termination of processing of personal data (except in cases where processing is necessary to clarify personal data).
- 2.8 Destruction of personal data actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which the material carriers of personal data are destroyed.
- **2.9** Depersonalization of personal data actions as a result of which it becomes impossible to determine the identity of personal data to a specific Subject of personal data without the use of additional information.
- Personal data information system a set of personal data contained in databases and 2.10 information technologies and technical means that ensure their processing.
- 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 Personal Data Operator - limited liability company "Innovative Ecological Platform", independently organizing and (or) processing personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.
- 2.13 The subject of personal data is an individual to whom the relevant personal data relate.
- 2.14 User – an individual to whom the relevant personal data relates, viewing the content of the site and / or using the functionality of the site.
- 2.15 Subdomain – pages or a set of pages located on third-level domains belonging to websites https://ecoplatform.tech/https://ecoplatform.ru, as well as other temporary pages, at the bottom of which the contact information of Ecoplatform is indicated.
- **2.16** Cookies (cookies) data that is automatically transmitted to Ecoplatform during the use of the Sites using the installed on the User's device of the software, including the IP address, geographical location, information about the browser and the type of operating system of the User's device, technical characteristics of the hardware and software used by the User, date and time of access to the Sites. By accepting the terms of the Policy, you agree to the use of cookies.
- IP address a unique network address of a node in a computer network through which the Subject of personal data gets access to the Site.

3. LEGAL GROUNDS AND PURPOSES OF PERSONAL DATA PROCESSING

- **3.1** Ecoplatform stores Personal data in the Russian Federation in the compliance with the law. The legal grounds for processing personal data are:
 - Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" (hereinafter FZ-152, the Law).
 - Federal Law of the Russian Federation No. 149-FZ of 27.07.2006 "On Information, Information Technologies and Information Protection";
 - Other applicable legal acts;
 - Local legal acts of Ecoplatform;
 - User's consent to the processing of personal data.
- **3.2** Ecoplatform processes the User's personal data exclusively for the following purposes:
 - 3.2.1 Registration and identification of the User on the Sites, providing the User with the opportunity to fully use the Sites;
 - 3.2.2 Displaying the User profile for other Users of the Sites;

- 3.2.3 Establishing and maintaining communication between the User and Ecoplatform, consulting on the provision of services and the sale of goods of Ecoplatform (including by calling and sending SMS messages, messages in the messengers "WhatsApp", "Viber", "Telegram" and by e-mail);
- 3.2.4 Sending by Ecoplatform to the User of advertising messages, newsletters about products, services and its partners, about special offers, promotions, sweepstakes, contests, surveys to the User's email address, by the User's phone number (User name) in the messengers "WhatsApp", "Viber", "Telegram", by means of mailing, SMS messages, push notifications, as well as informing the User of such information orally by phone;
- 3.2.5 Placement on Websites, in official groups of social networks and other communities of Ecoplatform on the Internet, other advertising and information sources, for purposes not related to the identification of the User:
- videos and photographs obtained in the process of providing services,
- User reviews of services provided by Ecoplatform.
- 3.2.6 Improving the quality of User service and upgrading Sites by processing requests and requests from the User;
 - 3.2.7 Statistical and other research based on depersonalized information provided by the User.

4. CONDITIONS AND PROCEDURE FOR GRANTING CONSENT TO THE PROCESSING OF PERSONAL DATA

- **4.1** Ecoplatform does not verify the personal data provided by the User. In this regard, Ecoplatform proceeds from the fact that when providing personal data on the Sites, the User:
 - 4.1.1 Is a legally capable person. In case of incapacity of the person using the Sites, consent to the processing of personal data is provided by the legal representative of the User, who has read and accepted the conditions for processing personal data specified in this Policy.
 - 4.1.2 Indicates reliable information about himself or about the represented incapacitated person in the amounts necessary for the use of the Sites. The user independently maintains the provided personal data up to date.
 - 4.1.3 Is aware that the information on the Sites posted by the User about himself may become available to other Users of the Sites, may be copied and distributed by such Users in cases stipulated by the Policy.
- 4.2 The User accepts the terms of the Policy and gives Ecoplatform informed and conscious consent to the processing of their personal data on the terms stipulated by the Private Policy and the Law, when registering and identifying on the Sites when filling out feedback forms, profile in the Personal Account, registration and authorization forms on the Internet on Websites and electronic services. The User is considered to have given consent to the processing of their personal data at the time of sending it and/or marking the User in the checkbox "I agree with the Privacy Policy and the terms of personal data processing".

5. PERSONAL DATA PROCESSED BY THE INNOVATIVE ECOLOGICAL PLATFORM

- Last name of the user
- First name of the user
- User's phone number
- Email address
- Company name
- Image (if uploaded in the user's Personal Account)
- Data of accounts in social networks and messengers (if specified)
- User loyalty card data (if specified)
- Cookies



6. THE PROCEDURE FOR REVOKING CONSENT TO THE PROCESSING OF PERSONAL DATA, UPDATING AND CORRECTING PERSONAL DATA

- **6.1** The consent provided by the User in accordance with this Private Policy for the processing of personal data is valid from the date of such consent and for the period necessary to achieve the purposes of personal data processing or until the User withdraws the consent, unless otherwise provided by the current legislation of the Russian Federation. The consent provided by the User in accordance with this Private Policy to the processing of personal data may be revoked by the User at any time. The User may revoke the previously granted consent to the processing of personal data by sending a corresponding application in the form of an electronic document to the email address info@ecoplatform.tech.
- **6.2** The subject of personal data has the right to request to delete, make corrections, update personal data, request to restrict the processing of personal data or object to the processing of personal data, when this is provided for by applicable law. Ecoplatform responds to these requests in accordance with applicable law.

7. MEASURES TAKEN BY ECOPLATFORM TO PROTECT PERSONAL DATA

- **7.1** Ecoplatform takes the necessary and sufficient legal, organizational and technical measures to protect the information provided by Users from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions with it by third parties. Such actions, in particular, include:
 - Appointment of the person responsible for the processing of personal data;
 - Application of organizational and technical measures to ensure the security of personal data during their processing in information systems;
 - Monitoring the facts of unauthorized access to personal data and taking measures to prevent such incidents in the future;
 - Control over the measures taken to ensure the security of personal data and the level of security of information systems with personal data.

8. POLICY CHANGE

- **8.1** Ecoplatform reserves the right to make changes to the Private Policy. The Private Policy may be changed without any special notice and without payment of any compensation in this regard. The User is obliged to familiarize themselves with the text of the Private Policy at each new use of the Sites of Ecoplatform.
- **8.2** The new version of the Private Policy comes into force from the moment it is posted in the relevant section of the Websites of Ecoplatform. Continued use of the Sites after the publication of the new version of the Private Policy means acceptance of the Private Policy and its terms by the User. In case of disagreement with the terms of the Private Policy, the User must immediately stop using the Site.
- **8.3** Please send all questions about this Policy to the email address info@ecoplatform.tech.

9. INFORMATION ABOUT ECOPLATFORM

INNOVATIVE ECOLOGICAL PLATFORM LLC (IEP LLC)

Brand name: Ecoplatform

Legal address: 119415, Russia, Moscow, Vernadskogo prospect, 41bld1, MSPK, office 533

TIN: 7731392620

CHECKPOINT: 773101001 PRSN: 5177746232330

Company bank account: 40702810701400012882 Correspondent account: 30101810200000000593

Bank: ALFA-BANK JSC BIC: 044525593