


APPROVED  
Director  
of LLC SIMEX-CHEM

  
S.P. Molodtsov  
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## **POLICY OF PROTECTION AND PROCESSING PERSONAL DATA OF CLIENTS, CONTRACTORS AND WEBSITE USERS**

### **1. GENERAL PROVISIONS**

1.1. This policy of personal data processing is drawn up in accordance with the requirements of the Federal Law of 27.07.2006. No. 152-FZ "On Personal Data" (hereinafter - the Law on Personal Data) and determines the procedure of personal data processing and measures to ensure the security of personal data taken by the organization "SIMEX-CHEM" (OGRN: 1165275053272, TIN: 5263127165, address of registration: 606000, Nizhny Novgorod region, Dzerzhinsk, Avtozavodskoye shosse, 99V, office 1) (hereinafter referred to as the Operator).

1.2. The Operator sets as its most important goal and condition of its activity the observance of human and citizen's rights and freedoms in the processing of personal data, including the protection of the rights to privacy, personal and family secrecy.

1.3. This Operator's policy on personal data processing (hereinafter - the Policy) applies to all information that the Operator may obtain about visitors to the website <http://simex-chem.ru> (hereinafter - the Site). The Site does not control and is not responsible for third party websites to which the User can access via links available on the Site <http://simex-chem.ru>.

1.4. Use of the Site services means unconditional consent of the User with this Policy and the terms of processing of his personal information specified in it. In case of disagreement with these conditions, the User should refrain from using the services.

### **2. TERMS USED IN THE POLICY**

2.1. Automated processing of personal data - processing of personal data by means of computing equipment.

2.2. Blocking of personal data - temporary cessation of personal data processing (except for cases when processing is necessary to clarify personal data).

2.3. Website - a set of graphic and informational materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address <http://simex-chem.ru>.

2.4. Personal data information system - a set of personal data contained in databases and information technologies and technical means ensuring their processing.

2.5. Personal data depersonalization - actions, as a result of which it is impossible to determine without using additional information whether personal data belong to a particular User or other subject of personal data.

2.6. Processing of personal data - any action (operation) or set of actions (operations) performed with or without the use of automation means with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.7. Operator - a state authority, municipal authority, legal entity or individual, independently or jointly with other persons organizing and (or) carrying out processing of personal data, as well as determining the purposes of personal data processing, composition of personal data subject to processing, actions (operations) performed with personal data.

2.8. Personal data - any information relating directly or indirectly to a certain or defined User of the Website <http://simex-chem.ru>.

2.9. Personal data authorized by the subject of personal data for dissemination - personal data, access to which is provided by the subject of personal data to an unlimited number of persons by giving consent to the processing of personal data authorized by the subject of personal data for dissemination in accordance with the procedure provided by

the subject of personal data for dissemination in the manner prescribed by the Law on Personal Data (hereinafter - personal data authorized for dissemination).

2.10. User - any visitor of the Website <http://simex-chem.ru>.

2.11. Provision of personal data - actions aimed at disclosure of personal data to a certain person or a certain circle of persons.

2.12. Dissemination of personal data - any actions aimed at disclosure of personal data to an indefinite number of persons (transfer of personal data) or at familiarization with personal data of an unlimited number of persons, including disclosure of personal data in mass media, placement in information and telecommunication networks or providing access to personal data in any other way.

2.13. Cross-border transfer of personal data - transfer of personal data to the territory of a foreign country to a foreign government authority, a foreign individual or a foreign legal entity.

2.14. Destruction of personal data - any actions, as a result of which personal data are irretrievably destroyed with the impossibility of further recovery of the content of personal data in the information system of personal data and (or) material carriers of personal data are destroyed.

### **3. RIGHTS AND OBLIGATIONS OF THE OPERATOR**

3.1. The operator has the right to:

- to receive from the subject of personal data reliable information and/or documents containing personal data;
- In case the subject of personal data withdraws his/her consent to the processing of personal data, the Operator has the right to continue processing personal data without the consent of the subject of personal data if there are grounds specified in the Personal Data Law;
- independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Personal Data Law and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws.

3.2. The operator is obligated:

- provide the personal data subject, upon his/her request, with information regarding the processing of his/her personal data;
- Organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;
- respond to appeals and requests of personal data subjects and their legal representatives in accordance with the requirements of the Law on Personal Data;
- report to the authorized body for the protection of the rights of personal data subjects at the request of this body the necessary information within 10 working days from the date of receipt of such a request;
- publish or otherwise provide unrestricted access to this Policy on personal data processing;
- take legal, organizational and technical measures to protect personal data from unlawful or accidental access to them, destruction, modification, blocking, copying, provision, dissemination of personal data, as well as from other unlawful actions with regard to personal data;
- cease transfer (dissemination, provision, access) of personal data, stop processing and destroy personal data in the manner and cases stipulated by the Personal Data Law;
- fulfill other obligations stipulated by the Personal Data Law.

### **4. RIGHTS AND OBLIGATIONS OF PERSONAL DATA SUBJECTS**

4.1. Personal data subjects have the right to:

- to receive information regarding the processing of their personal data, except in cases stipulated by federal laws. Information shall be provided to the subject of personal data by the Operator in an accessible form and shall not contain personal data relating to other subjects of personal data, except in cases where there are legal grounds for disclosure of such personal data. The list of information and the procedure for obtaining it are established by the Law on Personal Data;
- demand from the operator to clarify his personal data, block or destroy them in case personal data are incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, as well as to take measures provided for by law to protect their rights;
- to impose the condition of prior consent when processing personal data in order to market goods, works and services;
- to revoke the consent to the processing of personal data;
- to appeal to the authorized body for the protection of the rights of personal data subjects or in court against unlawful acts or omissions of the Operator in the processing of his/her personal data;
- to exercise other rights provided for by the legislation of the Russian Federation.

4.2. Personal data subjects are obliged to:

- provide the Operator with reliable data about themselves;
- notify the Operator about clarification (update, change) of their personal data.

4.3. Persons who have provided the Operator with false information about themselves or information about another subject of personal data without the consent of the latter shall be held liable in accordance with the legislation of the Russian Federation.

## **5. LIST OF USER'S PERSONAL DATA PROCESSED BY OPERATOR**

5.1. Surname, first name, patronymic.

5.2. E-mail address.

5.3. Telephone numbers.

5.4. Year, month, date and place of birth.

5.5. Place of work, position.

5.6. Link to personal website or social networks.

5.7. Address of registration / correspondence / delivery of goods.

5.8. OGRN, TIN, information about bank accounts.

5.9. The site collects and processes anonymized data about visitors (including cookies) using Internet statistics services ("Yandex Metrika").

5.10. The aforementioned data further on text of the Policy are united by a common term "Personal Data".

5.11. The Operator does not process special categories of personal data relating to race, nationality, political opinions, religious or philosophical beliefs, intimate life.

5.12. Processing of personal data authorized for dissemination from among the special categories of personal data specified in part 1 of article 10 of the Personal Data Law is allowed if the prohibitions and conditions provided for in Article 10.1 of the Personal Data Law are observed.

5.13. The User's consent to the processing of personal data authorized for dissemination is executed separately from other consents to the processing of his/her personal data. The conditions stipulated in particular by Article 10.1 of the Law on Personal Data shall be observed. The requirements for the content of such consent shall be established by the authorized body for the protection of the rights of personal data subjects.

5.13.1. Consent to the processing of personal data authorized for dissemination is provided by the User directly to the Operator.

5.13.2. The Operator is obliged to publish information about the conditions of processing, prohibitions and conditions for the processing of personal data authorized for dissemination by an unlimited number of persons within three working days from the moment of receiving the said consent of the User.

5.13.3. The transfer (dissemination, provision, access) of personal data authorized by the subject of personal data for dissemination shall be terminated at any time at the request of the subject of personal data. This request shall include the surname, first name, patronymic (if any), contact information (telephone number, e-mail address or postal address) of the personal data subject, as well as a list of personal data whose processing is to be stopped. The personal data specified in this request may be processed only by the Operator to whom it is sent.

5.13.4. Consent to the processing of personal data authorized for dissemination shall cease to be valid from the moment the Operator receives the request specified in clause 5.13.3 of this Policy regarding the processing of personal data.

## **6. PRINCIPLES OF PERSONAL DATA PROCESSING**

6.1. Processing of personal data shall be carried out on a lawful and fair basis.

6.2. Processing of personal data is limited to the achievement of specific, predetermined and legitimate purposes. Processing of personal data incompatible with the purposes of personal data collection is not allowed.

6.3. It is not allowed to merge databases containing personal data processed for incompatible purposes.

6.4. Only personal data that meet the purposes of their processing shall be processed.

6.5. The content and scope of processed personal data correspond to the stated purposes of processing. The redundancy of processed personal data in relation to the stated purposes of their processing is not allowed.

6.6. When processing personal data, the accuracy of personal data, their sufficiency and, where necessary, relevance in relation to the purposes of personal data processing shall be ensured. The Operator shall take the necessary measures and/or ensure their adoption to delete or clarify incomplete or inaccurate data.

6.7. Personal data shall be stored in a form that allows identification of the subject of personal data for no longer than required by the purposes of personal data processing, unless the period of personal data storage is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor. Processed personal data shall be destroyed or depersonalized upon achievement of the purposes of processing or in case of loss of necessity

to achieve these purposes, unless otherwise provided for by federal law.

## **7. PURPOSES OF PERSONAL DATA PROCESSING**

7.1. The purpose of processing the User's personal data:

- Providing access to the User to services, information and/or materials contained on the Website <http://simex-chem.ru>.
- informing the User by sending e-mails, making phone calls.

7.2. The Operator has the right to send the User notifications about new products and services, special offers and various events. The User can always refuse to receive informational messages by sending the Operator a letter to the e-mail address [info@simex-chem.ru](mailto:info@simex-chem.ru) with the note "Refusal of notifications about new products and services and special offers".

7.3. The anonymized data of Users collected by means of Internet statistics services are used to collect information about Users' actions on the website, to improve the quality of the website and its content.

## **8. LEGAL BASIS FOR THE PROCESSING OF PERSONAL DATA**

8.1. The legal grounds for processing of personal data by the Operator are:

- Operator's statutory (founding) documents;
- federal laws, other legal acts in the field of personal data protection;
- Users' consent to the processing of their personal data, to the processing of personal data authorized for dissemination.

8.2. The Operator processes the User's personal data only if it is filled in and/or sent by the User through special forms located on the website <http://simex-chem.ru> or sent to the Operator by e-mail. By filling in the relevant forms and/or sending his/her personal data to the Operator, the User expresses his/her consent to this Policy.

8.3. The Operator processes anonymized data about the User if it is allowed in the User's browser settings (cookies and JavaScript technology enabled).

8.4. The subject of personal data independently decides on the provision of his/her personal data and gives consent freely, of his/her own free will and in his/her own interest.

## **9. CONDITIONS OF PERSONAL DATA PROCESSING**

9.1. Processing of personal data is carried out with the consent of the personal data subject to the processing of his/her personal data.

9.2. Processing of personal data is necessary to achieve the purposes provided for by the international treaty of the Russian Federation or by law, to fulfill the functions, powers and duties assigned to the operator by the legislation of the Russian Federation.

9.3. Processing of personal data is necessary for the administration of justice, execution of a judicial act, act of another body or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings.

9.4. The processing of personal data is necessary for the execution of an agreement to which the personal data subject is a party, beneficiary or guarantor, as well as for the conclusion of an agreement at the initiative of the personal data subject or an agreement under which the personal data subject will be a beneficiary or guarantor.

9.5. Processing of personal data is necessary for the exercise of rights and legitimate interests of the operator or third parties or for the achievement of socially important purposes, provided that the rights and freedoms of the personal data subject are not violated.

9.6. Processing of personal data is carried out where access to which is granted by the subject of personal data or at his/her request (hereinafter referred to as publicly available personal data).

9.7. Personal data subject to publication or mandatory disclosure in accordance with federal law shall be processed.

## **10. PROCEDURE FOR COLLECTION, STORAGE, TRANSFER AND OTHER TYPES OF PERSONAL DATA PROCESSING**

10.1. The security of personal data processed by the Operator is ensured by implementing legal, organizational and technical measures necessary for full compliance with the requirements of the applicable legislation in the field of personal data protection.

10.2. The Operator ensures the safety of personal data and takes all possible measures to exclude access to personal data by unauthorized persons.

10.3. The User's personal data will never, under no circumstances be transferred to third parties, except for cases related to the execution of the current legislation, or if the subject of personal data has given consent to the Operator to transfer the data to a third party for the fulfillment of obligations under a civil law contract.

10.4. The period of personal data processing is determined by the achievement of the purposes for which the

personal data were collected, unless another period is not provided for by the contract or applicable law.

10.5. The User may at any time change (supplement, update) the provided personal information or its part, as well as the parameters of its confidentiality, or completely delete all personal information about himself, leaving a statement to the Administration of the site in the following way:

Phone: +7 (831) 435-17-70

E-mail: [info@simex-chem.ru](mailto:info@simex-chem.ru)

Feedback form: <http://simex-chem.ru/>

10.6. The User may at any time, withdraw their consent to the processing of personal data, leaving a statement to the Administration of the site in the following way:

Phone: +7 (831) 435-17-70

E-mail: [info@simex-chem.ru](mailto:info@simex-chem.ru)

Feedback form: <http://simex-chem.ru/>

10.7. All information that is collected by third-party services, including payment systems, communications and other service providers, is stored and processed by these persons (Operators) in accordance with their User Agreement and Privacy Policy. The subject of personal data and/or the User is obliged to familiarize himself/herself with the said documents in a timely manner. The Operator is not responsible for the actions of third parties, including the service providers specified in this paragraph.

10.8. For the purposes of statistical processing of information, optimization and further development of the functionality of the Site, cookies are created and used, information about network addresses from which users register and authorize on the Site is recorded, as well as information about the actions of users made by them in the process of using the functionality of the Site, including with the help of specialized software (Yandex.Metrica, top.mail.ru,) may be stored.

10.9. The prohibitions established by the subject of personal data on the transfer (except for granting access), as well as on the processing or conditions of processing (except for obtaining access) of personal data authorized for dissemination shall not apply in cases of processing personal data in the state, public and other public interests defined by the legislation of the Russian Federation.

10.10. When processing personal data, the Operator ensures confidentiality of personal data.

10.11. The Operator shall store personal data in a form that allows to identify the subject of personal data for no longer than required for the purposes of personal data processing, unless the period of personal data storage is not established by the federal law, contract to which the personal data subject is a party, beneficiary or guarantor.

10.12. The condition for termination of personal data processing may be the achievement of the purposes of personal data processing, expiration of the personal data subject's consent or withdrawal of consent by the personal data subject, as well as detection of unlawful processing of personal data.

## **11. LIST OF ACTIONS PERFORMED BY THE OPERATOR WITH USERS' PERSONAL DATA**

11.1. The Operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes and destroys personal data.

11.2. The Operator carries out automated processing of personal data with or without receiving and/or transmitting the received information via information and telecommunication networks.

## **12. TRANS-BORDER TRANSFER OF PERSONAL DATA**

12.1. Before commencing the trans-border transfer of personal data, the Operator is obliged to ensure that the foreign state, to the territory of which the transfer of personal data is supposed to be carried out, provides reliable protection of the rights of personal data subjects.

12.2. Transborder transfer of personal data to the territory of foreign states that do not meet the above requirements may be carried out only if the personal data subject consents in writing to the transborder transfer of his/her personal data and/or fulfillment of an agreement to which the personal data subject is a party.

## **13. CONFIDENTIALITY OF PERSONAL DATA**

13.1. The operator and other persons who have access to personal data are obliged not to disclose to third parties and not to disseminate personal data without the consent of the subject of personal data, unless otherwise provided by federal law.

## **14. FINAL PROVISIONS**

14.1 SIMEX-CHEM LLC has the right to make changes to this Privacy Policy.

When making changes to the current edition, the date of the last update shall be indicated.

The new edition of the Policy comes into effect from the moment of its posting, unless otherwise provided by the new edition of the Policy. The current edition is always on the page at:

[http://simex-chem.ru/docs/Personal\\_Data\\_Policy.pdf](http://simex-chem.ru/docs/Personal_Data_Policy.pdf).

14.2 The law of the Russian Federation shall apply to this Policy and the relations between the User and the Website arising in connection with the application of the Privacy Policy.

14.3 All questions and/or suggestions regarding the current Policy of personal information processing should be sent in the following way:

Phone: +7 (831) 435-17-70

E-mail: [info@simex-chem.ru](mailto:info@simex-chem.ru)

Feedback form: <http://simex-chem.ru/>