

PRIVACY POLICY

This personal data Privacy policy (henceforth known as the Privacy policy) applies in respect of any information, which the Administrator and/or the owner of the Site <https://nobconcept.com> (henceforth known as the Site), may receive about the User in relation to the use of the Site, as well as the programmes, and products, offered by the Limited liability company "NOB Agency," and its partners.

1. TERMS AND DEFINITIONS

1.1. The following terms are used in this Privacy policy:

1.1.1. "Site administration (henceforth known as Administration)" – authorised employees, acting on behalf of the Limited liability company "NOB Agency," who arrange, and (or) are engaged in the collection of personal data, as well as defining the objectives for the processing of personal data, and the content of this personal data, which is subject to processing, and actions (operations), that are carried out involving personal data.

1.1.2. "Personal information" – any information, relating, either directly to a specific individual, or to an individual who could be identified indirectly (the subject of the personal data), including any data mentioned in this Privacy policy.

1.1.3. "The processing of personal data" – any action (or operation) or a combination of actions (or operations), carried out using automated systems, or without using these automated systems, on personal data, namely the gathering, recording, classification, accumulation, storage, amendment (by updating, or changing), retrieval, use, dissemination (by means of distribution, provision, and access), depersonalisation, blocking, deletion, and destruction of personal data.

1.1.4. "The confidentiality of personal data" - the mandatory requirement for any Operator, or anyone else who has been given access to personal data, not to allow this data to be distributed without the permission of the subject of the personal data, or the availability of any other legal basis.

1.1.5. "Site user (henceforth known as the - User)" – anyone, who accesses the Site by means of the Internet and avails themselves of the Site, as well as the services, and opportunities on the Site.

2. GENERAL PROVISIONS

2.1. The use by the User of the materials, services, and opportunities on the Site indicates their agreement with this Privacy policy, and the conditions for the processing of the User's personal data in full. By going onto the site, the User confirms that they acknowledge the consequences of the transfer of personal data, and accept the responsibilities imposed by this Privacy policy, for the violation of these terms.

2.2. In the event that they are not in agreement with the terms of the Privacy policy the User should stop using the Site immediately. Any subsequent use of the Site indicates the User's agreement with the Privacy policy, specifically, with the provisions concerning the processing of personal data.

2.3. Use of the Site implies that the User is providing the Site with reliable information about themselves. Administration does not check the reliability of personal data provided by a User of the Site, in addition however, it does not accept responsibility should the data not correspond to reality.

3. THE SUBSTANCE OF THE PRIVACY POLICY

3.1. This Privacy policy establishes the obligations on the part of Administration in terms of non-dissemination, and supporting a regime of protecting the confidentiality of personal data, which the user provides at the request of Administration when they order an item.

3.2. Personal data, processing of which is permitted within the confines of this Privacy policy, is transferred by the User by filling out a registration form on the Site when they order an item, and includes:

- Surname, Name, Middle name
- E-mail address
- Telephone number
- Delivery address for their order.

3.3. The User is informed that Administration uses Cookies — a small piece of data, sent by the web-server and stored on the User's computer, which the web-client, or the web-browser forwards to the web-server in the form of an HTTP-request whenever an attempt is made to open a page from the corresponding site. Switching cookies off may mean that parts of the site requiring authorisation, are not accessible.

3.3.1. The Site collects statistical information on the IP-addresses of its visitors. This information is used to highlight, and resolve technical problems, and to monitor the legality of the financial transactions that are being undertaken.

3.4. Any other personal data not stipulated above (order history, and browsers, and operating systems used, and so on) is stored reliably and is not disseminated, with the exception of the instances, specified in subparagraphs 5.2. and 5.3. of this Privacy policy.

4. THE AIMS OF THE COLLECTION OF A USER'S PERSONAL DATA

4.1. Administration are able to use personal data in the following ways:

4.1.1. For identification of the User, who has ordered an item, to draw up an order, and to perform their obligations for the transfer of items, and (or) to conclude the User's agreement to use the site remotely.

4.1.2. To provide the User access to the Site's personalised resources.

4.1.3. To establish a two-way flow of information with the user, including sending notifications, and requests, as well as for carrying out market research concerning use of the Site, and offering services, and processing queries, and claims on behalf of the User.

4.1.4. For protecting the rights, and the legal interests of the User, including defining a User's location to prevent any fraudulent activity from being committed, to confirm the validity, and completeness of personal data provided by the User, and to provide the User with effective client, and technical support in the event of any problems linked to use of the Site, as well as for the purposes of enhancing the level of service.

4.1.5. To inform the Site User of the status of their order.

4.1.6. For processing, and receiving payments, for confirming applicable taxes, or tax concessions, for disputed transactions, and for deciding whether a User can be given access to a credit facility.

4.1.7. For processing depersonalised personal data for the purposes of obtaining statistical information with the help of Yandex.Metrica, and Google Analytics, amongst others.

5. METHODS AND TIMESCALES FOR THE PROCESSING OF PERSONAL DATA

5.1. Processing of a User's personal data is undertaken without a set timescale, using any legal means, including in personal data processing systems with the use of automation systems, or without these systems, right up to deleting a User's account from the Site, or until the User sends a request to cease processing their personal data. In this case Administration is obliged to cease processing the personal data of the User who sent this request, immediately on receipt of this request, and to destroy this data. If automation processes are being used to process personal data, Administration guarantees that the use of these systems provides an equal level of protection for the confidentiality of personal data, as if this personal data were processed in the usual way.

5.2. The User agrees that Administration reserves the right to transfer personal data to third parties, specifically, to courier services, postal organisations, and telecoms operators, exclusively for the purposes of executing an order from a User that was drawn up on the Site. The User reserves the right to request a list of the individuals, to whom personal data has been transferred for processing.

5.3. A User's personal data may be transferred to authorised government bodies in the Russian Federation, or other authorised individuals only on the basis of, and in accordance with, the procedures established under the laws of the Russian Federation. Administration will inform the User immediately of any such disclosure.

5.4. In the event of the loss, or release of personal data Administration is to inform the User immediately of this loss, or release of personal data. **The requirement for the destruction of personal data, and**

5.5. Administration is to take the necessary administrative and technical measures to protect the User's personal information from unlawful, or inadvertent access, destruction, amendment, blocking, copying, dissemination, or from any other unlawful actions on the part of third parties.

5.6. Administration, in conjunction with the User, is to take all measures that are necessary and within their power, to prevent losses, or any other negative consequences, brought about by a loss, or release of a User's personal data, including monitoring to define security threats to personal data during processing; and to apply administrative, and technical measures to ensure the security of personal data during processing; by means of evaluating the effectiveness of the measures undertaken to ensure the security of personal data; and by establishing the fact of unauthorised access to personal data, and taking steps to eradicate this; and also by setting the rules for access to personal data; by monitoring the measures that are being undertaken to ensure the security of personal data.

6. THE OBLIGATIONS OF BOTH PARTIES

6.1. The User is obliged to:

6.1.1. Provide the personal data necessary for the use of the Site.

6.1.2. Update, and maintain the personal data they have provided in the event of any changes.

6.1.3. In the event that the User has not yet reached the age of 18, the User is obliged to provide confirmation of consent for the Processing of their personal data on the part of a child's legal guardians. In the event of any doubt over the validity of any data provided by the User, Administration reserve the right to request additional information on the User, but only as much as is necessary to enable the validity of the personal data provided by the User to be established conclusively. During the course of a check on the validity of personal data Administration reserves the right to block the User's personal data.

6.2. Administration is obliged to:

6.2.1. Use the information they have received exclusively for the purposes indicated in article 4 of this Privacy policy.

6.2.2. To ensure confidential information is stored in confidence, and it is not disseminated without the prior written permission of the User, or on the instructions of authorised bodies, or designated officials, and also not to sell, exchange, publish, or disseminate using any means possible the User's personal data that has been sent to them, with the exception of subparagraphs 5.2. and 5.3. of this Privacy policy.

6.2.3. To take steps that are necessary, and within the powers of Administration, to protect the confidentiality of a User's personal data in accordance with the procedure that is normally used to protect information of this nature within existing business discourse.

6.2.4. To block personal data relating to an individual in question, from the moment of the advent either of a query from the User, or their legal representative, or from a government body concerning the protection of the rights of personal data subjects over the period of a check, in the event of unreliable personal data, or unlawful acts coming to light. Administration reserves the right to block personal data if, in the opinion of Administration, there is a risk of dissemination, unlawful transmission, or access, and so on. 6.2.5. To provide to the organisations, indicated by the User to meet the requirements, an electronic copy of the personal data, specified by the User, free of charge. 6.2.6. Administration regularly carries out monitoring of the systems, and methods, created, and used for processing personal data.

7. THE RESPONSIBILITY OF BOTH PARTIES

7.1. Administration, in the event that they have not performed their obligations, are responsible for losses incurred by the User in connection with the unlawful use of personal data, in accordance with the law of the Russian Federation, with the exception of instances, specified in subparagraphs 5.2., 5.3. and 7.2. of this Privacy policy.

7.2. In the event of the loss, or dissemination of Confidential information Administration is not responsible if this confidential information comes under the following:

7.2.1. It has become public knowledge prior to its loss, or dissemination.

7.2.2. It was received from a third party prior to the exact time at which it was received by administration.

7.2.3. It was disseminated with the User's permission, or by the User themselves.

7.3. Administration reserves the right, as a personal data processor, to process a User's personal data that corresponds to reality, appropriately. In addition, Administration, while they make every effort to ensure personal data is processed appropriately, are not responsible for the inappropriate processing of inconsistent, or incomplete personal data, or for the inappropriate provision of services, or for the Site not functioning properly if the personal data provided by the User contains errors, or is inconsistent. Apart from that, Administration is not responsible for the function (or outage) of third-party resources, which can be accessed via links that are present on the Site, including maintaining confidentiality for the personal data transferred to these third-party resources.

8. DISPUTE RESOLUTION

8.1. The submission of a complaint (a written proposal for resolving the dispute amicably) is mandatory prior to filing a legal case concerning disputes, arising from the relationship between the Site User, and Administration.

8.2. The individual receiving the complaint will inform the individual who submitted the complaint of the result of a review of the complaint in writing within 30 calendar days of its receipt.

8.3. If agreement cannot be reached the dispute will be handed over for review in the judiciary, in accordance with the current law of the Russian Federation.

8.4. The current law of the Russian Federation is applicable to this Privacy policy and to relations between the User, and Administration.

9. ADDITIONAL TERMS AND CONDITIONS

9.1. Administration reserves the right to make changes to this Privacy policy without the agreement of the User.

9.2. The new Privacy policy comes into force from the moment it is uploaded onto the Site, unless otherwise indicated by the new edition of the Privacy policy.

9.3. All suggestions, or questions concerning this Privacy policy, as well as requests for the cessation of processing, or transfer of personal data, the destruction of personal data, and any other requests, are to be sent by e-mail to Administration via the following e-mail address: **info@nobconcept.com**.

9.4. The active Privacy policy is uploaded on a page that can be accessed via the following link https://nobconcept.com/files/policy_ru.pdf

LIMITED LIABILITY COMPANY "NOB AGENCY"

Registered address: ulitsa Lubyanka B., blk. 24/15, bldg. 3, fl./of. 2 2-4, Moscow, 101000

Current account: 40702810801960001709

TIN: 7708352789

RRC: 770801001

Bank: SC "ALFA-BANK"

BIC: 044525593

Corr. acct: 30101810200000000593

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