



PRIVACY POLICY

(Personal data processing policy)

1. Purpose of the Policy

This document (hereinafter referred to as the Policy) defines the goals and general principles of processing personal data, as well as the implemented measures to protect personal data in the Limited Liability Company "GLOBAL SMART MARKET", obtained through the Website or Software. The Policy is a public document of the Operator and provides for the possibility of familiarization with it by any person.

2. Glossary

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| Automated PD Processing | – processing of personal data using computer technology. |
| Current threats to personal data security | – a set of conditions and factors that create the actual danger of unauthorized, including accidental, access to PD during their Processing in the PD Information System, which may result in Destruction, Modification, Blocking, Copying, Provision, Distribution of PD, as well as other unlawful actions. |
| Biometric PD | – information that characterizes the physiological and biological characteristics of a person (including an image of a person - photograph and video recording), on the basis of which his identity can be established and which is used by the Operator to establish the identity of the PD Subject. |
| Blocking | – temporary termination of PD Processing (except for cases where PD Processing is necessary to clarify PD). |
| Access | – the possibility of obtaining personal data and their use. |
| Information | – information (messages, data) regardless of the form of their presentation. |
| PD information system | – the totality of information technologies and technical means contained in PD databases and providing their Processing. |

Counterparty	– any Russian or foreign legal entity or individual with whom the Operator enters into a contractual relationship, with the exception of labor relations.
Material carrier	– paper or machine-readable storage medium (including magnetic and electronic) on which PD is recorded and stored.
Manual processing of personal data	– Processing of PD contained in the PD Information System or extracted from the PD Information System, if such actions with PD, such as use, clarification, distribution, destruction of PD in relation to each of the PD Subjects, are carried out with the direct participation of a person.
Depersonalization	– actions as a result of which it becomes impossible to determine the ownership of PD to a specific PD Subject without the use of additional Information.
Anonymized data	– data stored on any Material medium, including in information systems in electronic form, the ownership of which by a specific PD Subject cannot be determined without additional Information.
PD Processing or Processing	– any action (operation) or set of actions (operations) performed with PD using automation tools or without the use of such means, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (Distribution , Provision, Access), Depersonalization, Blocking, deletion, Destruction of PD.
Appeal	– a proposal, statement or complaint sent to the Operator in writing or in the form of an electronic document, as well as an oral appeal from a person.
Public PD	– PD, access of an unlimited number of persons to which is provided by the PD Subject or at his request, as well as PD that are included in publicly available PD sources (directories) with the written consent of the PD Subject.
Operator	– GLOBAL SMART MARKET LLC,141013, Moscow region, Mytishchi, st. Silicate, vld. 51A, building 1 room. 101, PSRN: 1225000040760, TIN: 5029269363.

Responsible for organizing Processing	– a person appointed by the Operator responsible for organizing PD Processing.
List	– list of positions, the filling of which involves the implementation of PD Processing.
Personal data or PD	– any information relating to a directly or indirectly identified or identifiable individual (PD Subject).
Policy	– the Operator’s document regarding the Processing and Protection of Personal Data, posted in the public domain.
Providing	– actions aimed at disclosing PD to a certain person or a certain circle of persons.
Software	– Operator’s information system, available on the Internet at the addresses: https://b2brics.org/ and https://b2brics.trade/ , containing personal information about the registered user.
Disclosure	– actions (inaction) as a result of which PD in any possible form (oral, written, other form, including using technical means) becomes known to third parties in the absence of a legal basis for providing such PD to the relevant third parties.
Information Disclosure	– providing the opportunity to familiarize yourself with personal data processed by the Operator.
Spreading	– actions aimed at disclosing personal data to an indefinite number of persons.
Website	– Operator’s websites on the Internet information and telecommunications network, located at the addresses: https://b2brics.org/ and https://b2brics.trade/ .
Special categories of PD	– information relating to race, nationality, political views, religious or philosophical beliefs, health, intimate life, criminal record.
Subject of PD or Subject	– directly or indirectly identified individual to whom the PD relates.
Cross-border transfer of personal data	– transfer of personal data to the territory of a foreign state, an authority of a foreign state, a foreign individual or a foreign legal entity.

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| Destruction | – actions as a result of which it becomes impossible to restore the content of PD in the PD Information System and (or) as a result of which Material Media of PD are destroyed. |
| Authorized Workers | – Workers included in the List. |
| Authorized body | – authorized state body for the protection of the rights of the PD Subject. |

3. **Legal grounds for processing personal data**

The policy has been developed in accordance with the following regulatory documents of the Russian Federation:

- Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data of January 28, 1981, as amended by the Committee of Ministers of the Council of Europe on June 15, 1999, ratified by Federal Law of the Russian Federation of December 19, 2005 No. 160-FZ “On Ratification of the Council of Europe Convention” on the protection of individuals during automated processing of personal data” within the framework of statements determined by this Federal Law;
- Constitution of the Russian Federation;
- Civil Code of the Russian Federation;
- Code of Administrative Offenses of the Russian Federation;
- Labor Code of the Russian Federation;
- Criminal Code of the Russian Federation;
- Federal Law of July 27, 2006 No. 152-FZ “On Personal Data” (hereinafter referred to as Federal Law No. 152-FZ);
- Federal Law of July 27, 2006 No. 149-FZ “On information, information technologies and information protection”;
- Federal Law of April 6, 2011 No. 63-FZ “On Electronic Signature”;
- List of confidential information approved by Decree of the President of the Russian Federation of March 6, 1997 No. 188;
- Regulations on the specifics of processing personal data carried out without the use of automation tools, approved by Decree of the Government of the Russian Federation of September 15, 2008 No. 687;
- Requirements for the protection of personal data during their processing in personal data information systems, approved by Decree of the Government of the Russian Federation of November 1, 2012 No. 1119.

The Operator processes personal data on a legal and fair basis. The legal basis for the processing of personal data is a set of legal and local acts, in pursuance of which and in accordance with which the Operator processes personal data:

- Labor Code of the Russian Federation;
- agreements concluded between GLOBAL SMART MARKET LLC and the subject of personal data;
- agreements concluded between GLOBAL SMART MARKET LLC and other legal entities within the framework of which the processing of personal data is expected;
- consent to the processing of personal data, etc.

4. **Purposes of collection, volume and categories of personal data processed, categories of personal data subjects**

4.1. The purposes of collecting and processing personal data are:

- 1) interaction with Counterparties when using the Website or Software, including:
 - providing access to the Website and Software, registration on the Website and Software;
 - receiving technical support when using the Website or Software if problems arise with the operation of the Website or Software;
 - preparation, conclusion, execution and termination of contracts with Contractors;
 - implementation of joint projects;
 - execution or conclusion of an agreement to which the PD Subject is a party or beneficiary or guarantor, including in the event that the Operator exercises its right to assign rights (claims) under such an agreement;
 - registration and execution of orders;
 - providing feedback and ensuring communication with PD Subjects, including on the issue of order assembly and delivery;
 - accrual of bonuses by the Operator's partners and resolution of issues arising in connection with the operation of bonus programs of the Operator's partners;
 - conducting audits, analytical and other internal studies in order to improve the quality of services provided.

Category of processed personal data: public and other categories of data.

Category of data subjects: Counterparties - individuals and legal entities who are or wish to enter into civil legal relations with the Operator, or their representatives - individuals.

List of PD processed by the Operator for the specified purpose in relation to the Counterparty:

- Full Name;
- gender;
- citizenship (nationality);
- registration addresses;

- phone number;
- E-mail address;
- information about the position held;
- for individuals registered as entrepreneurs - the main state registration number of an individual entrepreneur, registration data with the Pension Fund and information entered in the Unified State Register of Individual Entrepreneurs;
- taxpayer identification number;
- information about bank accounts and details;
- technical information: IP address, operating system type, device type (personal computer, mobile phone, tablet), browser type, geographic location, web form filling format, Internet service provider (if the Operator can correlate this information with a specific Subject of PD).

Types of PD processing: collection, systematization, accumulation, storage, clarification (updating, changing), use, depersonalization, blocking, destruction, as well as transfer of such information to third parties, in cases established by current legislation.

Processing method: automated.

Terms of PD processing: until the purpose of processing is achieved or until the Operator receives a written notification of the withdrawal of the PD Subject's consent to PD processing.

Data storage method: PD is stored electronically on the territory of the Russian Federation.

PD storage period: within the periods provided for by the legislation of the Russian Federation.

Destruction procedure: PD on electronic media is destroyed by deleting information (including backup copies).

- 2) notification of marketing promotions and new services and products of the Operator, including the provision of information of a notification or marketing nature, including about new products, services, ongoing marketing promotions and events.

Category of processed personal data: public and other categories of data.

Category of data subjects: individuals and legal entities who are Counterparties or their representatives - individuals who have given consent to the Operator to receive information of a notification or marketing nature.

List of personal data processed by the Operator for this purpose in relation to the beneficiaries of the Company:

- Full Name;
- gender;
- phone number;
- E-mail address;
- location address (mailing address);

- technical information: IP address, operating system type, device type (personal computer, mobile phone, tablet), browser type, geographic location, web form filling format, Internet service provider (if the Operator can correlate this information with a specific Subject of PD).

Types of PD processing: collection, systematization, accumulation, storage, clarification (updating, changing), use, depersonalization, blocking, destruction, as well as transfer of such information to third parties, in cases established by current legislation.

Processing method: automated.

Terms for PD processing: until the end of marketing campaigns/events, or until the purpose of processing is achieved, or until the Operator receives a written notification of the withdrawal of the PD Subject's consent to PD processing.

Data storage method: PD is stored electronically on the territory of the Russian Federation.

PD storage period: within the periods provided for by the legislation of the Russian Federation.

Destruction procedure: PD on electronic media is destroyed by deleting information (including backup copies).

Refusal

The Personal Data Subject may ask the Operator to stop sending marketing messages at any time by following the opt-out links in any marketing message sent to him or by contacting the Operator at any time.

If the PD Subject refuses to receive marketing messages, this will not apply to his PD provided to the Operator as a result of purchasing services, registering a warranty, experience using a product/service and/or other transactions.

4.2. **Cookies and pixels**

By visiting the Website or using the Software, the PD Subject consents to the processing of cookies using Yandex.Metrica metric services and other similar services for analytics and improving the level of operation of the Website and Software.

Cookies are small text files that the Website can place on the computer or device of the PD Subject when he visits the Website. Cookies help sites recognize your device the next time you visit.

A pixel is a small amount of code on a web page or in an email notification.

Like many other services, the Operator has the right to use pixels to find out whether the PD Subject has interacted with certain content of the Website or email. This helps the Operator measure and improve its own services/products and personalize the user experience. The Operator uses cookies and pixels to measure advertising effectiveness using marketing services and analytical systems.

Pixels of social networks, instant messengers and streaming services

The Operator has the right to use VKontakte, Odnoklassniki, Telegram, WhatsApp, RuTube, YouTube, TenChat, Ya.Zen and others pixels on the site/sites. These pixels collect information anonymously. They report how a site is visited and used by visitors/users without identifying individual visitors.

What can a PD Subject do if he wants to change his cookie settings or refuse to be tracked? Browsers typically accept cookies automatically, but you have the ability to control and/or delete cookies at your discretion. The PD subject can delete all cookies that are already on his computer, as well as set most browsers so that cookies are not tracked by browsers.

Disabling the cookie acceptance/transmission functionality may affect the availability and functionality of the Website or Software.

Most web browsers allow you to control most cookies through your browser settings. To learn more about cookies, including how to see what cookies have been set, the Data Subject can visit www.aboutcookies.org or www.allaboutcookies.org.

Popular web browsers such as Google Chrome, Mozilla Firefox and Microsoft Edge allow you to:

- see which cookies you have and delete them individually;
- block third party cookies;
- block cookies from certain websites;
- prevent the installation of all cookies;
- delete all cookies when closing the browser.

List of browsers on whose websites the PD Subject can learn how to manage cookies:

- Google Chrome;
- Microsoft Edge;
- Mozilla Firefox;
- Microsoft Internet Explorer;
- Opera;
- Apple Safari.

To find information regarding other browsers, the PD Subject must visit the website of the browser developer.

Marketing services and analytics systems

The Operator uses the following marketing tools/services and analytics systems in order to make its website/service/product more convenient to use and more effective for the PD Subject:

- Yandex.Metrica (information about Yandex.Metrica can be found on the website <https://yandex.ru/support/metrica/>),
- Yandex.Lens (information about Yandex.Lens can be found on the website <https://cloud.yandex.ru/docs/datalens/>),

- Yandex.Direct (information about Yandex.Direct can be found on the website <https://yandex.ru/support/direct/>).

5. **Restrictions on processing of PD by the Operator**

- 5.1. The Operator processes the categories of PD specified for the purposes of Processing.
- 5.2. The Operator does not process special categories of personal data relating to race, nationality, political views, religious or philosophical beliefs, or intimate life. At the same time, the Operator has the right to process Special categories of PD only in cases provided for by the legislation of the Russian Federation, if:
 - The PD subject or his legal representative has given consent in writing to the PD Processing;
 - PD are Public PD;
 - PD processing is carried out in accordance with the legislation on state social assistance, labor legislation, and pension legislation of the Russian Federation;
 - in other cases when the Processing of Special Categories of Personal Data is permitted by the legislation of the Russian Federation.
- 5.3. The Operator may process Biometric PD only with the written consent of the PD Subject.

6. **Procedure and conditions for processing personal data**

6.1. **Methods for obtaining PD**

- 6.1.1. The Operator receives all personal data of PD Subjects from them themselves or from their legal representatives.
- 6.1.2. The PD subject decides to provide his personal data and consents to their processing, acting of his own will and in his own interest.
- 6.1.3. Obtaining personal data of the subject from third parties is possible only if the PD Subject is notified about this in advance and with his written consent.

6.2. **Methods and timing of PD processing**

- 6.2.1. The Operator uses the following methods of processing personal data: mixed processing of personal data with transmission via an internal network and the Internet.
- 6.2.2. Personal data of PD Subjects is processed by the Operator in structural divisions in accordance with the functions performed.
- 6.2.3. Access to personal data processed without the use of automation tools is carried out in accordance with the approved list.
- 6.2.4. Access to personal data processed in personal data information systems (hereinafter - ISPD) is carried out in accordance with the list approved in the manner determined by the Operator.

- 6.2.5. Authorized persons admitted by the Operator to the personal data of PD Subjects have the right to receive only those personal data of the PD Subject that are necessary to perform specific functions, in accordance with the job description of the authorized persons.
- 6.2.6. Processing of personal data carried out without the use of automation tools is carried out in accordance with the requirements of the "Regulations on the specifics of processing personal data carried out without the use of automation tools", approved by Decree of the Government of the Russian Federation of September 15, 2008 No. 687.
- 6.2.7. Personal data, when processed in this way, is separated from other information, in particular, by recording it on separate physical PD media, in special sections or in the fields of forms (forms).
- 6.2.8. Personal data is processed by the Operator until the purposes of personal data processing are achieved, or until the PD Subject withdraws his personal data, or during the storage period of the information.

6.3. **PD storage**

- 6.3.1. PD is stored in a form that makes it possible to identify the PD Subject, no longer than required for the purposes of their processing.
- 6.3.2. Storage of physical PD media is carried out in specially equipped cabinets and safes. Storage locations are determined by the Operator's order on approval of storage locations for physical PD data media.
- 6.3.3. The Operator's electronic databases containing personal data of PD Subjects are located entirely on the territory of the Russian Federation.

6.4. **Personal data protection**

- 6.4.1. The Operator ensures protection of the PD Subjects from unlawful use or loss at its own expense in the manner established by the legislation of the Russian Federation.
- 6.4.2. Ensuring the security of personal data by the Operator is achieved, in particular, by the following measures:
 - assessment of the harm that may be caused to subjects of personal data in the event of a violation of the Law "On Personal Data", the relationship between this harm and the protective measures taken;
 - implementation of internal control and (or) audit of compliance of the processing of personal data with the law "On Personal Data" and internal documents of the Organization on the processing of personal data;
 - familiarization of employees processing personal data with the provisions of the legislation of the Russian Federation on personal data, the Organization's policy regarding the processing of personal data, local regulations on the processing of personal data, and (or) training of these employees;
 - publication of the Organization's policy regarding the processing of personal data, local acts on the processing of personal data;
 - accounting of computer storage media of personal data;
 - appointment of the Responsible for organizing the processing of personal data;

- use of information security means that have passed the compliance assessment procedure in accordance with the established procedure (certified information security systems);
 - identification of threats to the security of personal data during their processing in personal data information systems;
 - assessment of the effectiveness of measures taken to ensure the security of personal data before the commissioning of the personal data information system;
 - establishing rules for access to personal data processed in the personal data information system, as well as ensuring registration and accounting of all actions performed with personal data in the personal data information system;
 - detecting facts of unauthorized access to personal data and taking measures;
 - control over the measures taken to ensure the security of personal data and the level of security of personal data information systems;
 - restoration of personal data modified or destroyed due to unauthorized access to it.
- 6.4.3. The Operator reserves the right to verify the completeness and accuracy of the provided personal data with the consent of the PD Subject. If erroneous or incomplete personal data is identified, the Operator has the right to terminate all relations with the PD Subject.
- 6.5. **Transfer of personal data**
- 6.5.1. To achieve the goals of PD Processing, the Operator may entrust PD Processing to third parties, including outside the Russian Federation.
- 6.5.2. Transfer, including Cross-border transfer, of PD to third parties (except for Public PD and Anonymized Data) is permitted with the written consent of PD Subjects, except in cases where this is necessary in order to prevent a threat to the life and health of PD Subjects, as well as other cases provided for by the Labor Code Russian Federation, other legislation of the Russian Federation.
- 6.5.3. When transferring PD to third parties, the Operator fulfills the obligations provided for by its local regulations and the legislation of the Russian Federation.
- 6.5.4. Information and (or) documents containing PD are transferred without the consent of PD Subjects to prosecutors, law enforcement agencies and other government bodies within the established powers upon receipt of motivated requests from them. A reasoned request must include an indication of the purpose of the request, a link to the legal basis of the request, including confirming the authority of the body that sent the request, as well as a list of the requested Information containing PD.
- 6.5.5. If the Operator entrusts PD Processing to another person with the consent of the specified PD Subjects, the person carrying out PD Processing on behalf of the Operator is obliged to comply with the principles and rules of PD Processing provided for by the legislation of the Russian Federation in the field of PD and the Policy. An agreement with a person carrying out PD Processing on behalf of the Operator must comply with the requirements of the Policy.

Cross-border transfer of personal data

- 6.5.6. The Operator can carry out cross-border transfer of PD to achieve the goals established by the Policy, as well as in accordance with the legislation of the Russian Federation, the Policy and consents to Processing PD. At the same time, before starting the Cross-border transfer of PD, the Operator is obliged to make sure that the foreign state into whose territory the PD is transferred provides adequate protection of the rights of PD Subjects.
- 6.5.7. The Operator has the right to carry out cross-border transfer of PD on the territory of foreign states that do not provide adequate protection of the rights of PD Subjects in the following cases:
- (i) availability of written consent of the PD Subject for the Cross-border transfer of his PD;
 - (ii) execution of an agreement to which the PD Subject is a party;
 - (iii) protecting the life, health, and other vital interests of the PD Subject or other persons if it is impossible to obtain consent in writing;
 - (iv) in other cases provided for by the legislation of the Russian Federation.
- 6.6. **PD distribution**
- 6.6.1. Distribution of PD by the Operator is possible solely on the basis of the separate consent of the PD Subject.
- 6.6.2. The Operator provides the PD Subject with the opportunity to determine the list of PD for each category of PD specified in the consent to the processing of PD authorized by the PD Subject for Distribution.
- 6.6.3. Consent to the processing of PD authorized by the PD Subject for Distribution may be provided to the Operator:
- directly;
 - using the information system of the Authorized Body.
- 6.6.4. Silence or inaction of the PD Subject under no circumstances can be considered consent to the Distribution of PD.
- 6.6.5. By consent, the PD Subject has the right to establish prohibitions on the transfer (except for providing access) of this PD by the Operator to an unlimited number of persons, as well as prohibitions on Processing or conditions for Processing (except for gaining access) of this PD by an unlimited number of persons. The Operator's refusal to establish prohibitions and conditions is not permitted.
- 6.6.6. The Operator, within 3 (three) business days from the moment of receiving the appropriate consent of the PD Subject, publishes information about the conditions of Processing and the existence of prohibitions and conditions for Processing by an unlimited number of persons of PD, authorized by the PD Subject for Distribution.
- 6.6.7. Transfer (distribution, provision, access) of PD authorized by the PD Subject for Distribution is terminated by the Operator at any time at the request of the PD Subject. The consent is terminated from the moment the Operator receives the request.

7. **Regulations for responding to requests from PD Subjects and third parties and measures taken by the Operator to eliminate violations in relation to PD**

General provisions

- 7.1. The PD Subject's appeal can be sent to the Operator by any convenient means of communication, including to the Operator's location address and to the email address specified by the Operator on the Website and Software, in the Policy, and local regulations of the Operator.

Appeals from the PD Subject can be sent to:

- to the Operator's postal address: 141013, Moscow region, Mytishchi, st. Silicate, vld. 51A, building 1 room. 101, and/or
 - to the Operator's email address: hello@b2brics.org.
- 7.2. The PD Subject's Appeal must allow the PD Subject to be identified and contain an unambiguous and specific description of the facts, requests, demands, complaints and other circumstances that allow the Operator to establish the true meaning of the Appeal.
- 7.3. The PD Subject's appeal may be sent to the Operator by his representative acting by force of law or on the basis of a power of attorney. A copy of the document – the basis of the representative's powers – must be attached to the Application. An appeal received by the Operator from a representative upon provision of a properly executed document - the basis of authority, is considered to be received directly from the PD Subject.
- 7.4. The PD subject can use the request forms specified in Appendices No. 1-3 to the Policy.

Request for availability of PD and provision of access to PD

- 7.5. When a PD Subject makes a request to provide information about whether the Operator has the Subject's PD and/or to provide access to his PD, the Operator is guided by the requirements of the PD Law.
- 7.6. The decision to provide information about the availability of PD or to provide the Subject with access to his PD, as well as the decision to refuse to provide information or access, is made by the Operator within 10 (ten) business days from the date of receipt of the Application. This period may be extended, but not more than by 5 (five) working days if the Operator sends a motivated notification to the PD Subject indicating the reasons for extending the period for providing the requested information.
- 7.7. Information about the Operator's possession of the Subject's PD is provided in an accessible form, without providing PD relating to other PD Subjects. Information is provided free of charge.
- 7.8. The Operator provides each PD Subject with the opportunity to familiarize himself with his PD and documents and materials that directly affect his rights and freedoms in the field of PD Processing, and provides the PD Subject with information containing:

- (i) confirmation of the fact of PD processing by the Operator;
 - (ii) legal grounds and purposes of PD Processing;
 - (iii) purposes and applied methods of PD Processing;
 - (iv) name and location of the Operator, information about persons (except for Employees) who have Access to PD or to whom PD may be disclosed on the basis of an agreement with the Operator or on the basis of the legislation of the Russian Federation;
 - (v) processed PD related to the relevant PD Subject, the source of their receipt, unless a different procedure for presenting such data is provided for by the legislation of the Russian Federation;
 - (vi) terms of PD processing, including terms of their storage;
 - (vii) the procedure for the PD Subject to exercise the rights provided for by the PD Law;
 - (viii) information about the completed or intended cross-border transfer of personal data;
 - (ix) name or surname, first name, patronymic and address of the person carrying out PD Processing on behalf of the Operator, if Processing has been or will be assigned to such a person;
 - (x) information on how the Operator performs its duties;
 - (xi) other information provided for by the Personal Data Law or other legislation of the Russian Federation.
- 7.10. In case of refusal to provide information about the availability of PD or refusal to provide access to PD, the Operator gives a reasoned response in writing with the grounds for refusal, enshrined in Part 8 of Article 14 of the Law on PD or another regulatory act of the legislation of the Russian Federation.
- 7.11. If the PD is not received from the PD Subject, the Operator, before processing such PD, is obliged to provide the PD Subject with the following information:
- (i) name or surname, first name, patronymic and address of the Operator or his representative;
 - (ii) purpose of PD processing and its legal basis;
 - (iii) list of personal data;
 - (iv) intended users of personal data;
 - (v) the rights of the PD Subject established by the PD Law;
 - (vi) source of obtaining PD.
- 7.12. The Operator refuses to provide the above data if:
- The PD subject is notified of the processing of his PD by the relevant Operator;
 - PD was obtained on the basis of law or in connection with the execution of an agreement to which the PD Subject is a party or beneficiary or guarantor;
 - PD are Public;
 - The Operator carries out the Processing of PD for statistical or other research purposes, unless the rights and legitimate interests of the relevant PD Subjects are violated;
 - Providing the PD Subject with the specified information violates the rights and legitimate interests of third parties.

Unlawful Processing

- 7.13. If the PD Subject or the authorized body in the Application to the Operator provides information that his PD is illegally obtained or is not necessary for the stated purpose of processing, the Operator:
- carries out blocking of unlawfully processed PD relating to this Subject, or ensures their blocking (if PD processing is carried out by another person acting on behalf of the Operator) from the moment of such application or receipt of the specified request for the period of verification,
 - destroys such PD within 7 (seven) business days from the date of receipt of the Application.
- 7.14. At the same time, the Operator notifies the PD Subject of the changes made and measures taken and takes reasonable measures to notify third parties to whom the PD of this Subject has been transferred.

Outdated PD

- 7.15. If the PD Subject provides information in an Appeal to the Operator that his PD is incomplete, inaccurate or irrelevant, the Operator makes the necessary changes to the Subject's PD within 7 (seven) business days from the date of receipt of the Appeal.
- 7.16. Moreover, if inaccurate PD is identified during an Application by a PD Subject at the request of the Authorized Body, the Operator blocks PD related to this Subject or ensures their blocking (if the processing of PD is carried out by another person acting on behalf of the Operator) from the moment of such Application or receipt of the specified request for the period of verification, if blocking the PD does not violate the rights and legitimate interests of the PD Subject or third parties.
- 7.17. If it is confirmed that the PD is inaccurate, the Operator, based on the information provided by the Subject or the Authorized Body, or other necessary documents, clarifies the PD or ensures their clarification (if the processing of PD is carried out by another person acting on behalf of the Operator) within 7 (seven) business days from the date submission of such information and removes the blocking of PD.

Withdrawal of consent to PD Processing

- 7.18. When the Operator receives the Appeal with the revocation of the PD Subject's consent to the processing of his PD, the Operator stops their Processing or ensures the termination of such Processing (if the Processing of PD is carried out by another person acting on behalf of the Operator) and if the preservation of PD is no longer required for the purposes of Processing, destroys PD or ensures their destruction (if PD processing is carried out by another person acting on behalf of the Operator) within 30 (thirty) days from the date of receipt of the specified review.
- 7.19. Processing can continue if:
- otherwise provided by the agreement, to which the PD Subject is a party, beneficiary or guarantor, or another agreement between the Operator and the PD Subject
 - The Operator has no right to carry out PD Processing without the consent of the PD Subject on the grounds provided for by the PD Law or other legislation of the Russian Federation.

- 7.20. When withdrawing consent to PD Processing, the Operator explains to the PD Subject the legal consequences of refusal to provide PD.

Request to terminate PD Processing

- 7.21. When the Operator receives a request from a PD Subject to stop PD Processing, the Operator, within 10 (ten) business days from the date of receipt of the request, stops PD Processing or ensures the termination of such Processing (if such Processing is carried out by the person carrying out PD Processing).
- 7.22. Processing can be continued on the grounds provided for by the Personal Data Law (clauses 2 - 11 of part 1 of Article 6, part 2 of Article 10 and part 2 of Article 11 of the Law).
- 7.23. This period may be extended, but not more than by 5 (five) working days if the Operator sends a motivated notification to the PD Subject indicating the reasons for extending the period for providing the requested information.

Request to stop the transfer of personal data permitted for distribution

- 7.24. If the Operator is contacted by a Subject whose PD is processed by the Operator on the basis of the Subject's consent to distribute his PD, the Operator stops transfer (distribution, provision, access) of PD within 3 (three) business days from the receipt of the PD Subject's request or within the period specified in a court decision that has entered into legal force, and if such a period is not specified in the court decision, then within 3 (three) working days from the date the court decision enters into legal force.
- 7.25. The request of the PD Subject to terminate the transfer (distribution, provision, access) of PD must include the surname, first name, patronymic (if any), contact information (telephone number, email address or postal address) of the PD Subject, as well as a list of PD, Processing which are subject to termination.

Request from the Authorized Body

- 7.26. The Operator provides the Authorized Body with the required information upon its request within 10 (ten) working days from the date of receipt of such Application.
- 7.27. This period may be extended, but not more than by 5 (five) working days if the Operator sends a motivated notification to the authorized body indicating the reasons for extending the period for providing the requested information.

8. **Regulations for eliminating violations committed by the Operator when processing personal data**

Unlawful Processing of PD

- 8.1. If the Operator has identified the fact of unlawful Processing of PD, including by a person acting on behalf of the Operator, within 3 (three) business days from the date of this discovery, the Operator stops

the unlawful Processing of PD or ensures the termination of unlawful processing of PD by a person acting on behalf of the Operator.

- 8.2. The Operator destroys PD or ensures its destruction, if it is impossible to ensure the legality of PD processing, within 10 (ten) business days from the date of detection of unlawful PD processing.
- 8.3. The Operator notifies the PD Subject or the Authorized Body about the elimination of violations or the destruction of PD, if the Appeal was sent by this body.

Notification of the Authorized Body

- 8.4. In case of establishing the fact of unlawful or accidental transfer (provision, distribution, access) of PD, resulting in a violation of the rights of PD Subjects, the Operator, from the moment of detection of such an incident, independently or by the Authorized Body, or other interested party, notifies the Authorized Body:
 - 1) within 24 (twenty-four) hours about the incident that occurred, about the alleged reasons that led to the violation of the rights of PD Subjects, and the alleged harm caused to the rights of PD Subjects, about the measures taken to eliminate the consequences of the relevant incident, and also provide information about the person authorized by the Operator to interaction with the Authorized Body on issues related to the identified incident;
 - 2) within 72 (seventy-two) hours about the results of the internal investigation of the identified incident, as well as provide information about the persons whose actions caused the identified incident (if any).
 - 3) An internal investigation into the fact of unlawful or accidental transfer (provision, distribution, access) of PD, resulting in a violation of the rights of PD Subjects, is carried out by authorized Employees of the Operator on the basis of the relevant regulations.

9. Termination of PD Processing

Destruction of PD

- 9.1. The Operator carries out systematic monitoring and destroys information and documents, other Material media containing PD, and also deletes PD contained in PD Information systems and files stored on external electronic Material media, upon achieving the goal of PD Processing, after the expiration of the storage period established by the legislation of the Russian Federation PD, as well as upon the occurrence of other legal grounds.
- 9.2. If the purpose of Processing is achieved, the Operator stops the processing of PD or ensures its termination (if the processing of PD is carried out by another person acting on behalf of the Operator) and the destruction of PD or ensures their destruction (if the processing of PD is carried out by another person acting on behalf of the Operator) within a period not exceeding 30 (thirty) days from the date of achieving the goal of PD Processing.
- 9.3. Processing can continue if:

- otherwise provided by the agreement, to which the PD Subject is a party, beneficiary or guarantor, or another agreement between the Operator and the PD Subject,
 - The Operator has no right to carry out PD Processing without the consent of the PD Subject on the grounds provided for by the PD Law or other legislation of the Russian Federation.
- 9.4. Destruction of PD is carried out by the Person Responsible for organizing Processing with the obligatory execution of a PD Destruction Act in accordance with the Operator's local act on the procedure for the destruction of PD and their media.

Blocking PD

- 9.5. If it is not possible to destroy PD within the established time frame in case of unlawful processing of PD, unlawful or accidental transfer of PD, achievement of the purpose of Processing, upon receipt of a request to terminate Processing from the PD Subject, the Operator blocks such PD or ensures their blocking (if PD processing is carried out by another person, acting on behalf of the Operator) and ensures the destruction of personal data within 6 (six) months, unless a different period is established by the Law on Personal Data or other legislation of the Russian Federation.

10. **Final terms**

- 10.1. This Policy is a publicly available document and must be posted on the Website and Software on the Internet at: <https://b2brics.org/> and <https://b2brics.trade/>.
- 10.2. In case of failure to comply with the provisions of the Policy, the Operator is liable in accordance with the legislation of the Russian Federation.
- 10.3. The liability of the Operator's officials who have access to personal data for failure to comply with the requirements of the standards governing the processing and protection of personal data is determined in accordance with the legislation of the Russian Federation and the internal regulatory organizational and administrative documents of the Operator.



Appendix No. 1 to the Policy

**PD Subject Request Form
for clarification/blocking/destruction of PD**

To CEO of GLOBAL SMART MARKET LLC

(Full name, number of the main document certifying

the identity of the subject or his legal representative,

information about the date of issue of the specified document and

issuing authority, address, contact details)

REQUEST

**to clarify/block/destroy personal data,
in connection with the identification of inaccurate personal data**

Ask:

clarify block destroy

my personal data processed by GLOBAL SMART MARKET LLC in connection with the identification of the following inaccurate information:

(list reasons)

(date)

(signature)

(transcript)



Appendix No. 2 to the Policy

**PD Subject request form,
in case of detection of unreliable personal data**

To CEO of GLOBAL SMART MARKET LLC

(Full name, number of the main document certifying

the identity of the subject or his legal representative,

information about the date of issue of the specified document and

issuing authority, address, contact details)

**REQUEST
to stop processing personal data**

I request you to stop processing my personal data due to

(list reasons)

(date)

(signature)

(transcript)



Appendix No. 3 to the Policy

**PD Subject Request Form
to gain access to personal data**

To CEO of GLOBAL SMART MARKET LLC

(Full name, number of the main document certifying

the identity of the subject or his legal representative,

information about the date of issue of the specified document and

issuing authority, address, contact details)

REQUEST

to gain access to personal data

Please provide me with the following information (including documents) that constitutes my personal data for review:

(list reasons)

(date)

(signature)

(transcript)