

# Privacy Policy

Revision dated May 8, 2024

## 1. GENERAL PROVISIONS

1.1. This Personal Data Processing Policy (hereinafter referred to as the Policy) is made in accordance with the requirements of Federal Law of July 27, 2006 No. 152-ФЗ "On Personal Data" (hereinafter referred to as the "Law on Personal Data") and determines the procedure for processing personal data and various measures to ensure the security of personal data. According to the Policy, the Personal Data Processing Operator (hereinafter referred to as the "Operator") shall process the relevant personal data of persons whose personal data become available to the Operator during their visit to the website specified in Clause 1.2.

1.1. The Operator sets the observance of the rights and freedoms of man and citizen during the processing of own personal data (including the protection of rights to privacy, personal and family secrets) as its most important purpose and condition for the performance of its activities.

1.2. The Policy shall apply to all information that the Operator may receive about visitors to the website <https://inflave.com> (hereinafter referred to as the "Website").

1.3. Any references in the Policy to "you", "your" and "User" shall refer to all individuals who are visitors to the Website.

1.4. The Operator of your personal data will be DISPO TRADE FZCO (address: 27961 - 001, A1 - 3641379065, IFZA Business Park, Dubai Digital Park, Dubai, UAE, company registration number: DSO-FZCO-26114, e-mail: info@inflave.com).

1.5. The Operator shall take all necessary technical and organizational measures to protect personal data, which are stipulated by the legislation of the Russian Federation on the processing and protection of personal data.

## 2. TERMS AND DEFINITIONS

2.1. Automated processing of personal data shall mean the processing of personal data using computer technologies;

2.2. Website on the Internet shall mean any software for electronic computers and other information contained in an information system, access to which is granted through the Internet information and telecommunications network;

2.3. Website page on the Internet (hereinafter also referred to as the "Internet Page") shall mean a part of the Website on the Internet, access to which is granted using an index consisting of a domain name and symbols defined by the owner of the Website on the Internet;

2.4. Processing of personal data shall mean any action (operation) or set of actions (operations) performed using automation tools or without the use of such means with personal data (in particular, for collecting, recording, systematizing, accumulating, storing, clarifying (updating, changing), extracting, using, transferring (distributing, providing, accessing), depersonalizing, blocking, deleting, destructing personal data;

2.5. User shall mean any visitor to the Website <https://inflave.com>;

2.6. Provision of personal data shall mean any actions aimed at disclosing personal data to a certain person or persons;

## 3. PRINCIPLES FOR PROCESSING PERSONAL DATA

3.1. The processing of personal data shall be performed on a lawful and fair basis.

3.2. The processing of personal data shall be restricted to the achievement of specific, pre-defined and legitimate purposes. The processing of personal data that is incompatible with the purposes of collecting personal data is not permitted.

3.3. It is not allowed to combine databases containing personal data, the processing of which is performed for any purposes incompatible with each other.

3.4. Only personal data that meets the purposes of their processing shall be processed.

3.5. The content and scope of personal data processed shall correspond to the stated purposes of the processing procedure. All personal data processed should not be redundant in relation to the stated purposes of their processing.

3.6. In the processing of personal data, the accuracy, sufficiency and relevance (as necessary) of personal data in relation to the purposes of processing personal data shall be ensured. The Operator shall take the necessary measures or ensure that they are taken to delete or clarify any incomplete or inaccurate data.

3.7. The storage of personal data shall be performed in a form that makes it possible to identify the relevant personal data subject no longer than required by the purposes of processing personal data, unless the period for storing personal data is established by federal law, an agreement to which such personal data subject is a party, beneficiary or guarantor. The processed personal data shall be destructed or depersonalized upon the achievement of the purposes of the processing procedure or the loss of the need to achieve such purposes (unless otherwise stipulated by federal law).

#### 4. USER'S PERSONAL DATA

4.1. The Operator may process the following personal data of the User:

4.2. Personal data provided by the User when using the Website:

4.2.1. Full name;

4.2.2. E-mail address;

4.2.3. Telephone number;

4.2.4. Company name.

4.3. Data automatically collected by the Website during its use:

4.3.1. The Website collects and processes all anonymized data about visitors (including cookies) via Internet statistics services (Yandex Metrika, Google Analytics, etc.).

4.4. The above data shall refer to the personal data of Users.

4.5. The Policy shall apply only to information processed during the use of the Website.

#### 5. PURPOSES OF PROCESSING PERSONAL DATA

5.1. The purpose of processing the User's personal data is to notify the User by sending e-mails; to conclude, perform and terminate any civil contracts; and to grant an access to various services, information and/or materials contained on the Website to the User.

5.2. The Operator shall be entitled to notify the User of new products and services, special offers and various events. The User may always refuse to receive any information messages by sending the Operator an e-mail to [info@inflave.com](mailto:info@inflave.com) (marked as "Waiver of notice of new products and services and special offers").

5.3. Anonymized data of the User collected using Internet statistics services will be used for collecting the relevant information on the actions of the User on the Website and improving the quality of the Website and its content.

5.4. Upon the achievement of the purposes of the processing procedure and the occurrence of other grounds stipulated by the legislation of the Russian Federation on the processing and protection of personal data, the User's personal data shall be destroyed.

#### 6. LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

6.1. The Operator shall process the User's personal data only if they are filled out and/or sent by the User independently via special forms available on the Website <https://inflave.com>. By filling out the appropriate forms and/or sending own personal data to the Operator, the User shall express the consent to the Policy.

6.2. The Operator shall process any anonymized data regarding the User if it is allowed in the User's browser settings (saving cookies and using JavaScript technology are enabled).

6.3. The User will independently decide to provide own personal data and voluntarily give own consent freely, on his/her own will and in his/her own interest.

## 7. PROCEDURE FOR PROCESSING PERSONAL DATA

7.1. The security of personal data processed by the Operator shall be ensured by taking various legal, organizational and technical measures necessary to fully comply with the requirements of the applicable legislation on personal data protection.

7.2. The Operator shall ensure the safety of personal data and take all possible measures to prevent any access to personal data by unauthorized persons.

7.3. The User's personal data will not be transferred to third parties (except for cases related to the implementation of the applicable legislation).

7.4. If there are any inaccuracies in personal data, the User may update them independently by sending the relevant notice to the Operator's e-mail address [info@inflave.com](mailto:info@inflave.com) (marked as "Update of personal data").

7.5. The User consents to the processing of own personal data for the entire period necessary for the Operator to achieve the purposes of the processing procedure. The User may at any time withdraw own consent to the processing of personal data by sending the relevant notice to the Operator's e-mail address [info@inflave.com](mailto:info@inflave.com) (marked as "Withdrawal of consent to the processing of personal data").

7.6. All information collected by third-party services (in particular, payment systems, means of communication and other service providers) will be stored and processed by such services in accordance with their User Agreement and Privacy Policy. The User shall familiarize himself/herself with such documents in a timely manner. The Operator shall not be responsible for the actions of third parties, including the service providers specified in this clause.

7.7. The User shall be entitled to exercise own rights stipulated by the legislation of the Russian Federation on personal data, including, but not limited to:

7.7.1. clarify and update own personal data, demand their blocking or destruction;

7.7.2. request from the Operator the list of personal data being processed, legal grounds for processing, sources of their receipt, information on processing and storage periods, as well as other information related to the processing of own personal data.

## 8. CROSS-BORDER TRANSFER OF PERSONAL DATA

8.1. Prior to the cross-border transfer of personal data, the Operator shall ensure that any foreign state (where the relevant personal data are to be transferred) provides reliable protection of the rights of personal data subjects.

8.2. The cross-border transfer of personal data to any foreign states that do not meet the above requirements may only be performed if the User has the written consent to the cross-border transfer of own personal data and/or the performance of an agreement to which the relevant personal data subject is a party.

## 9. FINAL PROVISIONS

9.1. The User may receive any clarification on issues of interest regarding the processing of own personal data by contacting the Operator via e-mail [info@inflave.com](mailto:info@inflave.com).

- 9.2. When processing personal data, the Operator shall ensure the confidentiality of personal data.
- 9.3. We do not verify the accuracy of personal data provided by the User. We assume that any personal data provided by you to us is accurate.
- 9.4. We do not control and shall not be responsible for the processing of information on third party websites, which the User may access via links available on the Website.
- 9.5. This document will reflect any changes to the Personal Data Processing Policy made by the Operator. The Policy shall remain valid indefinitely until it is replaced by a new version.
- 9.6. The current version of the Policy is freely available on the Internet at [info@inflave.com](mailto:info@inflave.com).