

Privacy Policy

Limited Liability Company

“VANORTTON FOODS ”

I. General

This Privacy Policy Guideline (the “Guideline”) is an official document of VANORTTON LLC of 121357, Moscow, 29, Vereyskaya Str., bldg.33, office 205 (the “Company”), and determines the procedure on processing and protection of individuals (the “Users”) data using services, information, programs (including loyalty programs) posted on the domain name <http://vanortton.com/> (the “Site”).

Maintenance of privacy is crucial for the Company, since this Privacy Policy is aimed at protecting the rights and freedoms of a person and citizen while processing his personal data, including protection of privacy rights, personal and family secrets from unauthorized access and disclosure.

We have developed a Privacy Policy that describes how we process personal data – any actions (operations) or a set of actions (operations) performed with personal data using or not using automation tools, including collection, recording, systematization, accumulation, storage, updating (changing), extraction, usage, transferring (dissemination, provision, access), depersonalization, blocking, deletion, or destruction of personal data.

Relations related to the processing of personal data and information about users of the Site are regulated by this Guideline, other official documents of the Company and the current legislation of the Russian Federation.

We process personal data on a legal and fair basis, acting reasonably and in good faith and on the basis of the following principles:

- legitimacy of the purposes and methods of processing personal data;
- conscientiousness;
- correspondence between the purposes of processing personal data and the purposes predetermined and claimed at the collection of personal data, as well as the authorities of the Company;
- correspondence between the volume and nature of the processed personal data, the methods and the purposes of processing personal data.

This Privacy Policy governs any kind of processing personal data and personal information (any identity information and any other information related to it) about individuals who are consumers of the Company's products or services.

This Policy covers the processing of personal data collected by any means, both active and passive, over the Internet and not using it, from individuals located anywhere in the world.

II. Collection of personal data

The purpose of processing personal data is to fulfill the Company's obligations to Users in relation to the use of the Site and its services.

Users' personal data is processed with the consent of a subject of personal data to the processing of his personal data.

Personal data means any information related to an individual directly or indirectly identified or identifiable (a subject of personal data), which can be used to identify or communicate with a particular person.

We can request for your personal data at any time when you contact the Company. The Company may use such data in accordance with this Privacy Policy. It can also combine such data with other information for the purpose of providing and improving its products, services, content, and communications.

Below are some examples of types of personal data that the Company can collect, and how we can use this information.

WHAT PERSONAL DATA WE COLLECT

We can collect various data/information, including:

- name and surname
- date of birth;
- sex, marital status;
- postal address;
- telephone number;
- e-mail;
- information about selected contacts;

Personal data may also include information additionally provided by Users upon the Company's request in order to fulfill the Company's obligations to Users arising out of the service contract. The Company has the right, in particular, to request from the User a copy of his identity document or other document containing the User's name, surname, photo, as well as other additional data that, at the Company's discretion, will be necessary and sufficient to identify such User and allow avoiding abuse and violation of third party rights.

When you involve third parties in our activities or invite them to communicate with us, the Company may collect the personal data about these persons that you provide, such as: name, surname, date of birth, postal address, e-mail and telephone number.

When processing personal data, we ensure the accuracy and sufficiency of personal data and, if necessary, the relevance to the purposes of its processing.

III. Storage and use of personal data

Users' personal data is stored exclusively in electronic media and processed using automated systems, except when manual processing of personal data is required to fulfill legal requirements.

HOW WE USE YOUR PERSONAL DATA

The personal data we collect allows us to send you notices of new products, special offers and various events. They also help us improve our services, content and communications. If you do not wish to be included in our mailing list, you can unsubscribe at any time by informing us at the specified feedback contacts, as well as making changes to your profile settings on the Site.

We may use your personal data from time to time to send important notices containing information about changes to our terms, conditions and policies, as well as confirming orders placed and purchases made by you. Since such data is crucial for your relations with the Company, you can not refuse to receive such notices.

We may also use personal data for internal purposes, such as: conducting audits, data analyzes and various studies to improve the Company's products and services, and interacting with consumers.

If you participate in the raffle of prizes, a competition or a similar stimulating event, we reserve the right to use the personal data provided by you to manage such programs.

COLLECTION AND USE OF NON-PERSONAL DATA

We also collect non-personal data, i.e. the data that do not allow directly associating it with any particular individual. We can collect, use, transfer and disclose information that is not personal, for any purpose. Below are examples of non-personal data that we collect, and how we can use it:

We can collect personal data such as: information about the occupation, language, zip code, unique device identifier, location and time zone in which a particular product is used, in order to better understand consumer behavior and improve our products, services and communications.

We can also collect personal data/information about what the user is interested in on our Site when using our other products and services. Such personal data/information is collected and used to help us provide more useful information to our customers and understand which elements of our Site, products and services are most interesting. For the purposes of this Privacy Policy, aggregate data is treated as non-personal data/information.

If we combine non-personal data with personal data, such aggregate data will be treated as personal data, while such data remains combined.

IV. Transfer of personal data

Users' personal data is not transferred to any third parties, except for the cases directly provided by this Guideline.

The processing of the User's personal data is carried out without any time limit, in any legal way, including in the information systems of personal data using or not using automation tools.

The User agrees that the Company is entitled to transfer personal data to third parties, in particular, to courier services, postal organizations, telecommunication operators, etc., solely for the purposes specified in the section "Collection of Personal Data" of this Privacy Policy.

When specifying the User or if the User's consent is available, it is possible to transfer the User's personal data to third parties – the Company's counterparties provided that such counterparties would take obligations to maintain privacy of the information received, in particular, when using applications.

Applications used by Users on the Site are hosted and maintained by third parties (developers), which operate independently of the Company and do not act

in the name or on behalf of the Company. Users are required to get acquainted themselves with the rules for the provision of services and policies for the protection of personal data of such third parties (developers), before using relevant applications.

User's personal data can be transferred at the request of authorized government bodies of the Russian Federation only on the grounds and in the manner established by the legislation of the Russian Federation.

In case of revealing unreliable personal data or illegal actions, the Company blocks, for the period of verification, the personal data relating to the relevant User from the moment of the address or request of the User or his legal representative or authorized body for protection of the rights of subjects of personal data.

DISCLOSURE OF INFORMATION TO A THIRD PARTY

In some cases, the Company may provide certain personal data and information to strategic partners, which work with the Company to provide products and services, or those that help the Company sell products and services to consumers. We provide third parties with the minimum amount of personal data required only to provide the required service or conduct the necessary transaction.

Personal data will be provided by the Company only in order to provide consumers with products and services, as well as to improve these products and services and communications related thereto. Such information will not be provided to third parties for their marketing purposes.

To use your personal data for any other purpose we will request your consent to the processing of your personal data.

SERVICE PROVIDERS

The Company provides personal data/information to companies providing services such as: processing information, granting loans, executing customer orders, delivery, other consumer services, determining your interest in our products and services, conducting surveys aimed at studying our consumers or their satisfaction in quality of service. Such companies are committed to protecting your data regardless of the country of their location.

THIRD PARTIES

The Company may be required to disclose your personal data in accordance with the law, the judicial procedure, during the court proceedings, and/or based on public inquiries or requests from government authorities, on the territory or outside

the territory of your country of stay. We may also disclose your personal data/information about you if we determine that such disclosure is necessary or appropriate for the purposes of national security, maintenance of the law and order, or in other socially important cases.

We can also disclose personal data/information about you if we determine that disclosure is necessary to enforce our terms and conditions or to protect our activities and our users. In addition, in case of reorganization, merger or sale, we may transfer any or all of the personal data we collect to the appropriate third party.

V. Destruction of personal data

User's personal data is destroyed when:

- the User on his own removes data from his personal page using "Delete account" function available to the User through profile settings;
- the Company removes information placed by the User, as well as the User's personal page in cases established by the contract of sale (an offer);
- when a subject of personal data withdraws his consent to the processing of personal data.

VI. Protection of personal data

The Company takes precautions – including legal, organizational, administrative, technical and physical – to ensure the protection of your personal data in accordance with Art. 19 of the Federal Law dd. July 27, 2006 N 152-FZ "On Personal Data", in order to protect the User's personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as other illegal actions of third parties.

When you use certain products, services or applications of the Company or post entries on forums, in chats or social networks, the personal data you provide is visible to other users and can be read, collected or used by them. You are responsible for the personal data that you prefer to provide, in such cases on your own. For example, if you specify your name and e-mail in a forum entry, such information is public. Please take precautions when using these functions.

INTEGRITY AND PRESERVATION OF PERSONAL DATA

When you interact with the Company, you can easily keep your personal data and information up-to-date. We will store your personal data and information for the period necessary to achieve objectives described in this Privacy Policy, unless a longer period of data and information storage is required or authorized by the law.

We do not collect personal data about minors. If we become aware that we have received personal data about a minor, we will take steps to remove such information as soon as possible.

We strongly recommend that parents and other persons supervising minors (legal representatives – parents, adopters or guardians) monitor the use of websites by minors.

THIRD PARTY SITES AND SERVICES

Websites, products, applications and services of the Company may contain links to third party websites, products and services. Our products and services can also use or offer third party products or services. Personal data and information collected by third parties, which may include information such as location data or contact information, is governed by the privacy policies of such third parties. We encourage you to study the privacy policies of such third parties.

The Company is not liable for the actions of third parties which, as a result of using the Internet or the Services of the Site, have got access to information about the User, and for the consequences of using data and information that, according to the nature of the Site, is accessible to any Internet user.

OBSERVANCE OF YOUR PRIVACY AT THE COMPANY'S LEVEL

In order to ensure that your personal data is safe, we bring the privacy and safety standards to notice of the Company's employees and strictly monitor the compliance with privacy measures within the Company.

QUESTIONS ABOUT PRIVACY

If you have any questions regarding the Company's Privacy Policy or data processing by the Company, you can address us [at feedback contacts](#).

VII. Feedback

This Privacy Policy and the relations between the User and the Company are governed by the applicable laws of the Russian Federation.

Users may send their requests to the Company, including requests for the use of their personal data, how to send a withdrawal of consent to the processing of personal data in writing to the address specified in the section “General” hereof, or in the form of an electronic document signed by a qualified electronic signature in accordance with legislation of the Russian Federation, and sent by means of a feedback form.

The Company undertakes to review and forward the response to the received request of the User within 30 days from the date of receipt of the request.

MISCELLANEOUS

As for the rest, which is not directly stipulated by this Privacy Policy, the Company undertakes to follow the norms and provisions of the Federal Law No. 152-FZ dd. July 27, 2006 “On Personal Data”.

A visitor to the Company’s Site who provides his personal data and information thereby agrees with the terms and conditions of this Privacy Policy.

The Company reserves the right to make any changes to the Policy at any time at its discretion, with a view to further improving the system of protection against unauthorized access to personal data reported by Users without the User’s consent. When we make significant changes to the Privacy Policy, a notice is posted on our Site along with an updated version of the Privacy Policy.

This Policy is not applicable to the actions and Internet resources of third parties.