

# Personal Data Processing Policy

## 1. General provisions

This Personal Data Processing Policy is made in accordance with the requirements of Federal Law No. 152-FZ On Personal Data of 27 July 2006 and sets forth the procedure for personal data processing and measures to ensure personal data protection at Manufactura Soft LLC ("Operator").

1. The Operator considers the observance of human and civil rights, including the right to the privacy of personal life, personal and family secrets, in the course of personal data processing as its key goal and a prerequisite to its operations.
2. This Operator's Personal Data Processing Policy ("Policy") shall be applicable to all data the Operator may collect about the users of the website <http://exporussia2025.com/>.

## 2. Terms and Definitions

1. "Automated personal data processing" means personal data processing using computer technology;
2. "Blocking of personal data" means temporary suspension of personal data processing (except where processing is required to rectify personal data);
3. "Website" means a collection of graphical and information materials as well as computer programmes and databases that provide access to such materials on the Internet hosted under the web address <http://exporussia2025.com/>;
4. "Personal data information system" means a collection of personal data stored in the databases as well as hardware and software used for their processing;
5. "Personal data anonymisation" means actions that make it impossible, without the use of additional information, to identify personal data as related to a certain User or other personal data subject;
6. "Personal data processing" means any action (operation) or a set of actions (operations) performed on personal data with or without the use of automated technology, including collection, recording, systematisation, accumulation, storage, rectification (update, alteration), retrieval, use, transfer (distribution, granting access, accessing), anonymisation, blocking, deletion and destruction of personal data.
7. "Operator" means a state or municipal authority, legal entity or individual that processes personal data and/or organises such processing, whether independently or jointly with other persons, and determines the purposes of personal data processing, the scope of personal data to be processed, and the actions (operations) performed on personal data.
8. "Personal data" means any information related directly or indirectly to a specific or identifiable User of the website hosted under <http://exporussia2025.com/>;
9. "User" means any visitor of the website <http://exporussia2025.com/>;
10. "Granting access to personal data" means actions aimed at disclosing personal data to third party or a group of third parties.
11. "Personal data distribution" means any actions aimed at disclosing personal data to an indefinite number of third parties (personal data transfer) or making personal data available to the public, including disclosure via mass media, publication in information and telecommunication networks or providing access to it otherwise;
12. "Cross-border personal data transfer" means personal data transfer in a foreign country to a foreign state authority, a foreign individual or legal entity;
13. "Personal data destruction" means any actions to delete personal data in a personal data information system without a possibility of recovery and/or physically destroy media containing the personal data.

### **3. The Operator shall be entitled to process the following personal data of the User**

1. Full name;
2. Email address;
3. Personal data collected and anonymised on the website (including via cookie files) using web analytics services (Yandex Metrica, Google Analytics, etc.).
4. The above-mentioned data are hereinafter collectively referred to as “Personal Data”.

### **4. Purposes of personal data processing**

1. The purpose of a User’s personal data processing is to provide information to the User via email.
2. The Operator may also notify the User on new products and services, special offers, and events. The User can unsubscribe from such notifications at any time by sending the Operator an email to [info@factory.mn](mailto:info@factory.mn) with the wording “Unsubscribe me from new products, services and events notifications”.
3. Anonymised data of Users collected by web analytics services are used to analyse Users’ activity on the website and improve its usability and content.

### **5. Legal grounds for personal data processing**

1. The Operator shall process the User’s personal data only if the User fills it in and/or submits on their own via special forms at <http://exporussia2025.com/>. By filling in respective forms and/or submitting their personal data to the Operator, the User agrees with this Policy.
2. The Operator is able process the User’s anonymised data, only if this option is enabled in the User’s browser settings (cookies and JavaScript are enabled).

### **6. Procedures for collection, storage, transfer and other forms of personal data processing**

Security of personal data processed by the Operator is ensured by regulatory, organisational and technical measures, required for full compliance with the applicable laws on the protection of personal data.

1. The Operator shall ensure the safety of personal data and make best efforts to prevent unauthorised access thereto.
2. The User’s personal data may not, under any circumstances, be transferred to third parties unless required by the applicable laws.
3. Should any errors be detected in personal data, the User can update them on their own by sending the Operator a notice containing the wording “Personal data update” to the Operator’s email address [info@factory.mn](mailto:info@factory.mn).
4. The processing time for personal data shall be unlimited. The User can at any time withdraw their consent to personal data processing by sending the Operator a notice with the wording “Withdrawal of consent for personal data processing” to the Operator’s email address [info@factory.mn](mailto:info@factory.mn).

### **7. Cross-border transfers of personal data**

1. Prior to the commencement of the cross-border transfer of personal data, the Operator shall make sure that the foreign country, where personal data is intended to transfer to, provides reliable protection of the rights of a personal data subject.

2. Cross-border transfer of personal data to foreign countries that do not meet the above requirements is subject to the written consent of the personal data subject to cross-border transfer of their personal data and/or to execution of an agreement to which the personal data subject is a party.

## 8. Final provisions

1. The User can receive any clarifications on matters pertaining to the processing of their personal data by contacting the Operator via email address [info@factory.mn](mailto:info@factory.mn).
2. This document will reflect any changes in the Personal Data Processing Policy, introduced by the Operator. The Policy shall be valid for an unlimited period of time until it is replaced by a new version.
3. The current version of the Policy is publicly available on the Internet at <http://exporussia2025.com/policy/>.