

## **Privacy Policy**

This Privacy Policy (hereinafter referred to as the "Policy") sets out personal data processing practices of RCBI Solutions with respect to the personal information received from the Customer.

### **1. Terms and definitions**

1.1. This Policy uses the terms and definitions provided in the Terms of Service, unless otherwise provided by this Policy or derived from its substance. Otherwise, the interpretation of the term used in the Policy shall be made in accordance with applicable law or business usage.

### **2. General provisions**

2.1. This Policy is an integral part of the Terms of Service and is incorporated thereto by reference.

2.2. When using the Services, passing registration/authorization in the Service Platform, placing an Order and / or a Request, Customer freely, by its own will and in its interests, gives informed written consent to the following methods of processing the Personal information: recording, systematization, storage, clarification (update, change), retrieving, use, transfer (provision, access) to third parties, anonymisation, blocking, deletion, destruction, cross-border transfer for the purposes and in the manner established by this Policy, with the use of automation tools or without the use of such tools at the discretion of RCBI Solutions.

### **3. Personal information**

3.1. Personal information in this Policy means:

3.1.1. The information that the Customer provides when registering or authorizing in the Service Platform, as well as in the process of other use of the Services, including the personal data of the Customer or third parties, provided to RCBI Solutions via the Service Platform.

3.1.2. Data, which is transmitted to RCBI Solutions automatically depending on the Customer's software settings in anonymised form.

3.2. RCBI Solutions shall be entitled to establish requirements for the scope of the Customer's Personal Information, which must be provided for the use of the Services and/or the conclusion of an Order (including the Customer's Requests). If certain information is not marked as obligatory by RCBI Solutions, its provision or disclosure shall be at the discretion of the Customer.

3.3. Upon registration in the Service Platform, the Customer should specify his/her surname and first name, as well as the e-mail address. Additionally, other data may be specified at the discretion of the Customer. Upon registration in the Service, the Customer shall be assigned a login and password.

3.4. If the Customer provides RCBI Solutions with personal information via the Service Platform, including personal data and other personal information of third parties (clients of the Customer, etc.), the Customer shall be obliged to independently obtain from such third parties appropriate consent for the processing and use of their personal data and other personal information, as well as for transmission thereof (provision, access) to RCBI Solutions for the purpose of using and processing it in accordance with this Policy and the Terms of Service. Such consent or consents must be obtained by the Customer in the form prescribed by law, in

accordance with the requirements of the law under whose jurisdiction the subject of personal data is located on the basis of his/her nationality, permanent residence or predominant residence (stay) or on other grounds determined by the law of each particular state. The end user of the Services, registering, authorizing and in the Service Platform and / or using it in any way, including sending Orders and Requests and performing other legal and actual actions in the Service Platform on behalf of another individual or legal entity, group persons or their associations, confirms and guarantees that he/she/it is duly authorized to perform such actions in accordance with the personal law of an individual or legal entity, on behalf of and (or) in whose interests the end user of the Services acts.

3.5. RCBI Solutions is not obliged to verify the authenticity of the personal information provided and whether the Customer has the necessary consent to process it in accordance with this Policy, relying on assumption that the Customer acts in good faith, prudently and fulfills all legal requirements to keep such information up to date, and also receives all the necessary consents of the subjects of personal data and has such consents in the form prescribed by the law at the time of providing the personal information in the Service Platform, and such consents shall be valid for the duration of the use and processing of the personal information determined in accordance with this Policy.

3.6. The Customer understands, accepts and agrees that RCBI Solutions uses third-party software in the Service, as a result of which such third-parties may automatically receive and transmit anonymised data.

Such third-party software includes:

a) analytical data collection and processing systems:

- Google Analytics, Google Firebase collection and processing data in accordance with the privacy policy available at: <https://policies.google.com/privacy>
- Yandex.Metrica, which collects and processes data in accordance with the privacy policy available at: <https://yandex.ru/legal/confidential/>

b) advertisement displaying systems:

- Facebook business tools that collect and process data in accordance with the data use policy available at: [https://web.facebook.com/full\\_data\\_use\\_policy](https://web.facebook.com/full_data_use_policy)

Data collected with the use of the third-party software may include:

- data about the Customer's device (model, manufacturer, amount of free memory), its location (country, city), operating system data (type, version, screen resolution) etc.;
- Service request data (time, referral source, IP address);
- other anonymized data about the actions of the Customer in the Service Platform, including those obtained using cookies.

The composition, as well as the conditions for the collection and use of anonymised data by the right holders of the said software shall be determined directly by such right holders and shall be regulated by documents available on their websites.

By accepting this Policy, as well as setting certain settings in its software, including the operating system of the device, the Customer agrees to the terms and conditions of data collection and use by the rights holders of the above-mentioned software.

Anonymised data shall not be combined with the information about the Customer specified in clause 3.1.1 and shall not be used to be identify by the Customer or its customers.

3.7. RCBI Solutions and third-party software may use cookie—a small piece of text transmitted to Customer's computer (browser) and containing information about Customer's preferences and use of the Service. Cookie files help remember certain parameters Customer have chosen, including authorization in the Service. The parameters for working with cookies shall be configured in the browser itself on the Customer's user device. If Customer does not accept all cookies, Customer may not be able to use the functionality of the Service.

#### **4. Objectives of processing and limits of use of Personal information**

4.1. RCBI Solutions shall process, including collect and store only the personal information necessary for the conclusion and performance of the Services.

4.2. RCBI Solutions shall have the right to use and process personal information for the following purposes:

4.2.1 Conclusion of an Order for the use of the Services. The Orders shall be concluded remotely through the exchange of electronic documents signed by a ordinary electronic signature.

At the same time, a login-password pair shall serve as the ordinary electronic signature key of the Customer. Therefore, they shall be requested upon registration.

4.2.2. Identification of the Customer as part of the performance of obligations under the Terms of Service. The Customer's personal account is linked to the Customer's login-password and e-mail address.

When sending information about the Order and (or) Request, providing information and requesting technical support, the Customer shall be identified by login, name, or e-mail address.

4.2.3. Fulfillment of obligations under the Terms of Service, including providing the Customer with access to the Services and technical support.

In order to implement the respective functionalities of the Service Platform, RCBI Solutions may store, systematize and display in the Service Platform the Customer's profile, as well as other information provided by the Customer.

In order to provide technical support, the data on the localization of the Customer's device (language and country), device model, operating system version and other technical information may be used.

4.2.3.1. Solely for the purpose of full and high-quality provision of the Services, including for the purpose of forming the Offers, RCBI Solutions shall:

- store, organize and display in the Customer's Personal Account the information provided by the Customer when making requests for the provision of Services, including, but not limited to, information about names (in the last name/first name format or in another format), date of birth, citizenship, occupation, family and property status, family composition and age of family members of the Customer or clients of the Customer,

- use the specified personal information about the Customer or the clients of the Customer by means of its automated processing using software (computer programs and databases) of RCBI Solutions.

Personal information may be received from the Customer, stored and processed in accordance with this clause 4.2.3.1. of the Policy in a completely automated mode without human intervention (employees of RCBI Solutions or other persons).

Personal information specified in this clause 4.2.3.1. of the Policy will be stored and processed in the Service Platform in the anonymised (encrypted) form. Thus, the employees of RCBI Solutions and other third parties involved by him/her for the provision of the Services shall not have access to such personal information.

Only the Customer (including all end users of the Service who have access to the Customer's Personal Account) shall have access to the personal information specified in this clause 4.2.3.1. of the Policy upon authorization in the Personal Account using a login and password.

4.2.4. Ensuring the security and confidentiality of personal information by the Customer.

In order to check for suspicious activities, the Service shall collect information about the IP address and browser used by the Customer.

4.2.5. Provision of communication with the Customer in order to provide the Services and improve the quality of the Services.

4.2.6. Conduct of marketing, statistical and other research based on anonymised data in order to improve the quality of the Services. Data from the analytical data collection systems specified in clause 3.6. of the Policy shall be collected and analyzed in an anonymised form to find out about the interests and preferences of customers.

4.2.7. Targeting of advertising and/or information materials using anonymised data from the data collection systems specified in clause 3.6. of the Policy.

## **5. Requirements for the protection of Personal information**

5.1. RCBI Solutions shall store personal information and ensure its protection from unauthorized access and distribution in accordance with its internal rules and regulations.

5.2. The Customer's personal information shall be kept confidential. 5.3. In order to improve the quality of the Service, RCBI Solutions shall have the right to store log files on actions performed by the Customer within the framework of using the Services, as well as in connection with the conclusion and execution of the Order by the Customer on his part, for 1 (One) year.

## **6. Transfer of information**

6.1. RCBI Solutions shall have the right to transfer personal information to third parties in the following cases:

- The Customer has expressed his consent to such actions, including cases when the Customer uses the software without restricting the provision of certain information;
- The transfer is required for the conclusion and execution of Orders for the Services;
- The transfer is necessary as part of the Customer's use of the functionality of the Service Platform;
- In connection with the use of third-party software in the Service Platform to implement the functionality of the Services.
- In connection with the use of third-party software in the Service Platform for collecting and processing the Customer's data. In particular, to collect and process anonymised data, RCBI Solutions may use third-party software in accordance with clause 3.6. this Policy;
- In connection with the transfer of the Services of RCBI Solutions to the possession, use or property of a third party or the assignment of rights (transfer of obligations) under the Terms of Service in favor of a third party;
- At the request of a court or other authorized state body under the procedure established by law;

- To protect the rights and legitimate interests of RCBI Solutions in connection with the violation of Terms of Service.

6.2. As a general rule, RCBI Solutions shall not provide personal information of the clients of the Customer, which is specified in clause 4.2.3.1. of the Policy, to third parties, except for cases where it is provided by the requirements of the law, including at the request of the court and other authorized state bodies, as well as except for cases of transfer of the Services of RCBI Solutions to the possession, use or property of a third party or assignment of rights (transfer of obligations) under the Terms of Service in favor of a third party.

6.3. The Customer accepts and confirms that all personal information provided by it in the Service within one Personal Account, including personal information provided by different end users using the Personal Account when placing Orders and Requests, will be available to all end users who have access to the Customer's Personal Account.

## **7. Modification and deletion of Personal Information**

7.1. The Customer shall have the right at any time to independently edit in his Personal Account the Personal Information provided by him during registration or authorization.

7.2. In the event of termination of the concluded Order, the Customer shall have the right to independently delete his own Personal Account using the appropriate functionality in the Personal Account.

## **8. Special provisions for residents of the European Union**

8.1. Customer can contact RCBI Solutions at any time by e-mail [info@rcbisolutions.com](mailto:info@rcbisolutions.com) in order to:

- request access to your personal information stored by RCBI Solutions. RCBI Solutions may ask Customer to provide certain information in order to verify your identity. If the information in Customer's account turns out to be inaccurate, incomplete or outdated, Customer shall provide RCBI Solutions with up-to-date data for correction;
- to withdraw his/her consent to the processing of personal information. The use of this right will not affect the legality of information processing prior to such revocation;
- to demand deletion of his/her personal information or deny access to it. RCBI Solutions shall have the right to postpone or reject Customer's request if its personal information is currently being used to provide the Services, to operate the Service Platform, or for other legitimate purposes. In this case, RCBI Solutions shall be obliged to send Customer an appropriate reasoned notification indicating the reasons for the impossibility of fulfilling Customer's request;
- to receive personal information that Customer provided to RCBI Solutions in a structured, generally accepted and machine-readable format, as well as to exercise the right to transfer this information to other persons of Customer's choice, if technically possible. This right cannot be exercised if it can have a negative effect on the rights and freedoms of third parties;
- to ask questions about the processing of Customer's personal information. RCBI Solutions will consider Customer's request and will make every effort to resolve any issues that arise.

If Customer believes that the processing of its personal information violates data protection laws, Customer shall have a legal right to lodge a complaint with the supervisory authority responsible for data protection. This can be done in the EU Member State where Customer permanently live, work, or where the of alleged violation took place.

## **9. The Policy as related to children**

9.1. RCBI Solutions does not knowingly collect or request personal information from persons under the age of 18 and do not knowingly allow such persons to use the Services. If you are under 18 years old, do not send any information about yourself to RCBI Solutions, including your name, address, telephone number or email address. Persons under the age of 18 are not allowed to provide their personal information to RCBI Solutions. If RCBI Solutions reveals that it has received personal information from a person under the age of 18, RCBI Solutions will delete this information as soon as possible. If you believe that RCBI Solutions may have any information about a person under 18 years old provided without the consent of his parents or any other legal representatives, including received from such a person, please contact RCBI Solutions at the email address [info@rcbisolutions.com](mailto:info@rcbisolutions.com).

## **10. Specific Provisions for California Customers and Data Subjects**

10.1. These additional provisions apply only to California resident individuals. Under the California Consumer Privacy Act of 2018 (“CCPA”), you have additional rights to receive information (“right to know”), delete your information, and refuse to provide personal information. The CCPA requires “businesses” that collect or disclose personal information to provide the means to exercise these rights and appropriate notices.

10.2. The categories of personal information collected in the previous 12 months are specified in Section 3 of this Policy.

The purposes of processing, including the collection and storage of personal information, are specified in section 4 of this Policy.

Third parties to whom RCBI Solutions can transfer your information, as well as the conditions under which such transfer is possible, are specified in clause 6 of this Policy.

10.3. You have the right at any time to request information about which personal information RCBI Solutions has collected, disclosed, used and sold, and to require RCBI Solutions to delete your personal information. This applies to all of the categories described above.

To exercise your right to provide information or have your data erased, please write to [info@rcbisolutions.com](mailto:info@rcbisolutions.com) or RCBI Solutions 's office at Business Center Logistics City, Dubai Aviation City, P.O. Box: 390667, Dubai, U. A. E.. with California Rights Request in the subject line (Request to exercise rights guaranteed by the State of California). Before processing the request, RCBI Solutions will need to verify your identity. For this purpose it is usually necessary to compare a sufficient amount of information you provide to us with information about you stored in the Service Platform. Under certain circumstances, RCBI Solutions may reject a request to provide information or to delete data. This usually happens if RCBI Solutions cannot verify your identity. In certain circumstances, an authorized agent may submit a request on your behalf, provided that you provide sufficient evidence that the person is an authorized agent and has written authorization to act on your behalf, and you will confirm your identity.

10.4. Upon confirmation of your request, RCBI Solutions will remove your personal information from its records (and we will give appropriate instructions to its service providers) unless when the retention of this information is necessary for RCBI Solutions or its service providers to complete the transaction to which you are a party, detect security incidents or fraud, correct errors, exercise freedom of speech or other right provided for by the law for the fulfilment of our legal obligations, as well as in other cases of legitimate internal use.

10.5. The CCPA gives you the right to indicate to the enterprise that sells your Personal Information, to cease and desist from such sale. RCBI Solutions does not sell your Personal Information and require its service providers not to sell the Personal Information of RCBI Solutions's Customers and their customers, as well as end users.

10.6. You also have the right not to be discriminated against for exercising any of the rights listed above.

10.7. RCBI Solutions shall make every effort to process requests from subjects of personal data for access to the personal information or data deletion within 45 days of receiving the request. If RCBI Solutions needs more time, RCBI Solutions will inform you in writing of the reasons and indicate a new date.

## **11. Terms of storage and processing of personal information. Location of storage and processing of personal information**

11.1. RCBI Solutions shall store and process personal information until the goals of its storage are achieved.

11.2. When providing the Services, RCBI Solutions may store the Personal Information provided by the Customer for the entire duration of the Order concluded with the Customer and three years after its termination. Personal information provided by the Customer when making a Request for the provision of specific Services under the Agreement may be stored for 3 three years after the formation of an Offer in the Service upon the corresponding Request.

11.3. Under certain conditions, RCBI Solutions may store personal information for a longer period, in particular, in the following cases:

- during the storage period of documentation related to the execution of Orders, including in the event of disputes and legal proceedings, in order to protect the rights and legitimate interests of RCBI Solutions;

- in order to comply with legal requirements, prevent fraud, receive payments and collect debts for the Services provided by RCBI Solutions, resolve disputes, eliminate problems and in other cases permitted in accordance with the law.

11.4. Personal information, or part of it, may be stored and processed on servers and computing facilities located in different jurisdictions where laws may differ from the applicable law as defined by Terms of Service and (or) from the law of the state of residence of the Customer and (or) another subject of personal data transmitted to RCBI Solutions.

11.5. In case of cross-border transfer of Personal Information as between RCBI Solutions's own data repositories (including "cloud" data storage systems used by RCBI Solutions under contracts with relevant service providers) and the cross-border transfers of personal information to third parties for the purpose of storage on the server and computer facilities of such third parties, in the case of storage of personal information on the territory of states not members of the European Economic Area ("EEA") and not meeting the requirement of an appropriate level of protection of personal data, contracts with these third parties will include adequate provisions and requirements for the protection and confidentiality of personal data of the EEA residents for the purpose to comply with the EEA requirements.

## **12. Reimbursement for losses of RCBI Solutions**

12.1. In case of violation of this Policy by the Customer or end users of the Services, acting on behalf of and at the direction of the Customer, including but not limited to clauses 3.4., 3.5. of the Policy, the Customer undertakes to reimburse RCBI Solutions for the resulting losses in full, including the costs of RCBI Solutions for the payment of fines, compensations, penalties charged

from RCBI Solutions in accordance with the legislation of any state, as well as legal costs and expenses for obtaining legal advice and representation in courts and other authorized state bodies.

### **13. Amendments to the Privacy Policy**

13.1. This Policy may be amended or terminated by RCBI Solutions unilaterally without prior notice to the Customer. The new version of the Policy enters into force as soon as it is posted on the Service Platform of RCBI Solutions, unless otherwise provided by the new version of the Policy.

This version of the Policy is dated "10" September 2021.