

**My-Foods, LLC**  
**Personal Data Processing Policy**

**1. General provisions**

1.1. This Personal Data Processing Policy (hereinafter referred to as the Policy) compiled in accordance with paragraph 2 of article 18.1 of the Federal law of the Russian Federation "About Personal Data" No. 152-FZ dated July 27, 2006 and applies to all personal data processed by My-Foods, LLC (hereinafter referred to as the Operator).

1.2. The Purpose hereof is to define the categories of personal data processed by the Operator, as well as the main principles that the Operator follows when processing such.

1.3. The Provisions hereof are binding on all employees of the Operator, organizations that receive or provide personal data to the Operator, and all individuals who are in contractual relations with the Operator.

1.4. The following definitions are used in the Policy:

- Personal data is any information related directly or indirectly to a specific or identifiable individual (subject of personal data);
- Personal data operator (Operator) is a state body, municipal body, legal entity or individual that independently or jointly with other persons organizes and/or performs the processing of personal data, as well as determines the purposes of personal data processing, the composition of personal data to be processed, actions/operations performed with personal data;
- Personal data processing is any action/operation or a set of actions/operations with personal data performed using automation tools or without such. The personal data processing includes, but is not limited to:
  - ◆ collecting;
  - ◆ recording;
  - ◆ systematizing;
  - ◆ accumulating;
  - ◆ keeping;
  - ◆ refinement (updating, changing);
  - ◆ extracting;
  - ◆ using;
  - ◆ transferring (distribution, provision, accessing);
  - ◆ depersonalizing;
  - ◆ blocking;
  - ◆ deleting;
  - ◆ destructing.

- **Automated processing of personal data** is processing of personal data using computer engineering means;
- **Distribution of personal data** is all actions aimed at disclosure of personal data to an indefinite scope of persons;
- **Provision of personal data** is all actions aimed at disclosure of personal data to a certain person or a certain scope of persons;
- **Blocking of personal data** is temporary abandonment of processing of personal data (except in cases where processing is necessary to clarify personal data);
- **Destruction of personal data** is all actions that make it impossible to restore the personal data in the personal data information system and/or as a result of which the material carriers of personal data are destroyed;
- **Depersonalization of personal data** is all actions that make it impossible to determine whether personal data belongs to a specific personal data subject without using additional information;
- **Personal data information system** is a set of personal data contained in databases and information technologies and technical means that ensure their processing;
- **Cross-border transfer of personal data** is the transfer of personal data to the territory of a foreign country, to an authority of a foreign state, a foreign individual or a foreign legal entity.
- **Confidentiality of personal data** is the obligation of the Operator and other persons who have obtained access to personal data not to disclose or distribute personal data to third parties without the consent of the personal data subject, unless otherwise provided by Federal law.

1.5. The personal data subjects or their legal representatives have the right:

- to receive full information about their personal data and the processing of the data (including automated processing);
- to have free access to their personal data, including the right to receive copies of any record containing personal data of the subject, except in cases provided for in the Federal law of the Russian Federation;
- to request the exclusion or correction of incorrect or incomplete personal data, as well as data that is processed in violation of the legislation of the Russian Federation;
- to declare disagreement in writing, providing the appropriate justification if the Operator or its authorized person refuses to exclude or correct the personal data of the subject;
- to demand from the Operator or its authorized person to notify all persons who were previously informed of incorrect or incomplete personal data of the subject of all changes made to them or exceptions to them;

- to appeal to a court against any illegal actions or omissions of the Operator or its authorized person carried out during the processing and protection of personal data of the subject.

1.6. Personal data Subjects or their legal representatives are required to:

- provide the Operator with realistic personal data;
- promptly notify the Operator of any changes to personal data.

1.7. The Operator has the right to process personal data providing that there are legal grounds, compliance of the processing with the stated purposes of processing and the requirements of the legislation of the Russian Federation, the provisions of this Policy and other local acts of the Operator.

1.8. The Operator is obliged to:

- at the Operator's own expense, protect personal data from misuse or loss in accordance with the procedure established by the legislation of the Russian Federation;
- provide personal data subjects with information concerning the processing of their personal data upon their request, or legally refuse to do so;
- provide the subjects with free access to their personal data, including the right to receive copies of any records containing their personal data, except in cases stipulated by the legislation of the Russian Federation;
- at the request of the personal data subject, specify the personal data being processed, block or delete the personal data if it is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;
- keep a Log of requests from personal data subjects, which should record requests from personal data subjects to receive personal data, as well as the facts of providing personal data for these requests;
- notify the personal data subject about the processing of personal data if the personal data was not received from the personal data subject;
- if the purpose of processing personal data is achieved, immediately stop processing personal data and destroy the relevant personal data within a period not exceeding thirty days from the date of achieving the purpose of processing personal data, unless otherwise provided by Federal legislation of the Russian Federation, and notify the personal data subject or his legal representative, and if the request or inquiry was sent by the authorized body for the protection of the rights of personal data subjects the Operator is to notify also the specified body;

- If a personal data subject withdraws consent to the processing of his personal data, to stop processing personal data and to destroy personal data within a period not exceeding thirty days from the date of receipt of the said withdrawal, unless otherwise provided by the agreement between the Operator and the personal data subject;
- provide personal data of the subject only to authorized persons and only in the part that is necessary for them to perform their work duties in accordance with this Provision and the legislation of the Russian Federation.

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

2.1. For each category of personal data, the Operator has defined and approved specific processing purposes. Processing of personal data that is incompatible with the approved purposes is not allowed.

2.2. Personal data is processed by the Operator for the following purposes:

- Selection of personnel for vacant positions in the Operator's company, evaluation of applicants for positions, formation of a personnel reserve.
- Maintaining personnel records, fulfilling the employer's obligations under employment agreements and the legislation of the Russian Federation, fulfilling obligations under the legislation of the Russian Federation, recording information necessary to support the employment relationship between the employee and the employer in accordance with the legislation of the Russian Federation, responding to requests from state bodies and employees of the Operator, including former employees.
- Attaching of an employee to a payroll program, receiving a bank card for him or her.
- Registration of permanent passes for employees, registration of permanent passes for individual contractors, registration of one-time passes for visitors.
- Registration of necessary documentation for business trips, compensation of travel expenses.
- Registration of proxy notices relating to representing the interests of the Operator, registration of letters of attorney for receiving inventory, identification of representatives of contractors by attorney.
- Bookkeeping and tax accounting, transfer of reports to state bodies.
- Organization of corporate education.

- Registration of voluntary medical insurance, accident insurance for employees and their relatives.
- Creation of a database of consumers and potential consumers, enriching the database, analyzing data, implementing marketing communications, and processing customer orders.
- Provision of in-house vehicles, registration of letters of attorney, settlement of insurance cases.
- Registration of business cards of employees.
- Conclusion of contracts, interaction under contracts.

2.2. The processed personal data is to be deleted or depersonalized at the end of the storage period, after the achievement of the processing goals, or in case of loss of the need to achieve these goals, unless otherwise provided by law.

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

Processing of personal data of the following categories is, among other things, carried out in accordance with the requirements of the Tax code of the Russian Federation and Federal law No. 402-FZ "On accounting", Federal law No. 125-FZ "About archival business in the Russian Federation", the Order of the Ministry of Culture of the Russian Federation dated 25.08.2010 No. 558 "About approval of the List of standard administrative archival documents generated in the course of activities of state bodies, local self-government bodies and organizations with indication of periods of storage", and also other normative legal acts of the Russian Federation, in the framework of implementing and complying with the functions, powers and duties mandated to the Operator under the legislation of the Russian Federation.

3.1. Processing of personal data of an applicant for a position is carried out on the basis of labor law, Federal law No. 1032-1 "On employment in Russian Federation", the consent of the data subject for processing of his/her personal data, contracts with staff agencies and recruiting sites, confirming the existence of consent or other legal basis for transferring personal data to the Operator.

3.2. Processing of personal data of an employee is based on employment, the pension and tax legislation of the Russian Federation, the legislation of the Russian Federation on state social assistance and social insurance, data subject's consent to the processing of his or her personal data, the contract a party and beneficiary of which is the data subject.

3.3. Processing of personal data of the employee's relatives is carried out on the basis of the labor and tax legislation of the Russian Federation, the legislation of the Russian Federation on state social assistance, and the consent of the data subject to the processing of his/her personal data.

3.4. Processing of personal data of dismissed employees is carried out on the basis of the labor legislation, the legislation on archival Affairs of the Russian Federation, the consent of the data subject to the processing of his/her personal data.

3.5. Processing of personal data of representatives of contractors is executed on the basis of agreements with contractors confirming the existence of consent or other legal basis for transfer of personal data to the Operator and the data subject's consent to the processing of personal data.

3.6. Processing of personal data of visitors coming to the Operator's territory is carried out on the basis of the consent of the data subject to the processing of his/her personal data.

3.7. Processing of personal data of individual contractors is executed on the basis of contracts a party to and beneficiary of which are data subjects, of the tax legislation of Russia, and of data subjects' consent to the processing of their personal data.

3.8. Processing of personal data of customers' representatives is carried out on the basis of agreements with contractors confirming the existence of consent or other legal grounds for the transfer of their personal data to the Operator, the consent of data subjects to the processing of their personal data.

3.9. Processing of personal data of individual clients is carried out on the basis of agreements a party and the beneficiary of which is the data subject and of the consent of the data subject to the processing of his/her personal data.

#### **4.Scope and categories of personal data processed, categories of personal data subjects**

4.1. The Operator processes personal data of subjects of the following categories:

- Applicants for positions
- Employees
- Relatives of employees
- Dismissed workers
- Representatives of contractors
- Visitors to the Operator's territory
- Individual counterparties
- Representatives of customers
- Individual clients

4.2. Personal data of applicants for positions includes the following information:

- Last name, First name, Patronymic;

- Gender;
- Date of birth;
  
- Information about the place of residence;
  
- Photo;
  
- Information about previous jobs (start date, end date, company, city, position, reason for dismissal);
  
- Information about work experience;
  
- Key skills;
  
- Driver's license;
  
- Information about education (type; name of the educational institution; year of graduation from the educational institution; qualification according to the educational certificate, specialty according to the educational certificate);
  
- Advanced training (start date of training; end date of training; type of advanced training; name of educational institution);
  
- Professional retraining (start date of retraining; end date of retraining; specialty);
  
- Proficiency in foreign languages;
  
- Citizenship;
  
- Phone number;
  
- Email address;
  
- Information about military registration;
  
- Marital status;
  
- Presence of children;
  
- Information about medical contraindications;
  
- Driving license;
  
- Medical card.

4.3. Personal data of employees includes the following information:

- Last name, First name, Patronymic;
- Service number;
- TIN;
- SNILS;
- Gender;
- Type of occupancy (full-time, part-time);
- Date of birth;
- Place of birth;
- Citizenship;
- Proficiency in foreign languages;
- Education (type; name of the educational institution; year of graduation from the educational institution; qualification document; name, series and number of the document confirming education, qualification or availability of special knowledge; specialty according to the educational certificate);
- Information about work experience (general; continuous);
- Marital status;
- Family structure;
- Passport data (series, number, date of issue, name of the issuing authority);
- Residence address;
- Registration address;
- Phone number;
- Information about military registration (reserve category; military rank; profile; military accounting specialty; category of fitness for military service);
- Information about employment and transfer to another job;
- Structural division;
- Position;
- Specialty;
- Profession;
- Certification;
- Basic rate (salary);
- Allowances;
- Grade, class (category) of qualification;
- Advanced training (start date of training; end date of training; type of advanced training; name of educational institution; certificate data (name; series, number; date));
- Professional retraining (date of beginning of retraining; date of end of retraining; specialty; certificate data (name, number, date));
- Vacation (type of vacation; period of work; number of calendar days of vacation; start and end date);
- Social benefits (name of the benefit, number and date of issue of the document);
- Grounds for termination of the employment contract (dismissal);
- Date of dismissal;



- Number and date of the employment contract;
- Information about business trips (date, destination, duration, purpose, source of funding, tasks);
- Information about work time (attendance and non-attendance).

4.4. Personal data of the employee's relatives includes the following information:

- Last name, First name, Patronymic;
- degree of relationship;
- date of birth;
- information about the identification document (name, series and number, date of issue of the document, name of the issuing authority, page with residence registration);
- actual address of residence;
- address at the place of registration;
- personal phone number.

4.5. Personal data of dismissed employees includes the following information:

- Last name, First name, Patronymic;
- Service number;
- TIN;
- SNILS;
- Gender;
- Type of occupancy (full-time, part-time);
- Date of birth;
- Place of birth;
- Citizenship;
- Proficiency in foreign languages;
- Education (type; name of the educational institution; year of graduation from the educational institution; qualification document; name, series and number of the document confirming education, qualification or availability of special knowledge; specialty according to the educational certificate);
- Information about work experience (general; continuous);
- Marital status;
- Family structure;
- Passport data (series, number, date of issue, name of the issuing authority);
- Residence address;
- Registration address;
- Phone number;

- Information about military registration (reserve category; military rank; profile; military accounting specialty; category of fitness for military service);
- Information about employment and transfer to another job;
- Structural division;
- Position;
- Specialty;
- Profession;
- Certification;
- Basic rate (salary);
- Allowances;
- Grade, class (category) of qualification;
- Advanced training (start date of training; end date of training; type of advanced training; name of educational institution; certificate data (name; series, number; date));
- Professional retraining (date of beginning of retraining; date of end of retraining; specialty; certificate data (name, number, date));
- Vacation (type of vacation; period of work; number of calendar days of vacation; start and end date);
- Social benefits (name of the benefit, number and date of issue of the document);
- Grounds for termination of the employment contract (dismissal);
- Date of dismissal;
- Number and date of the employment contract;
- Information about business trips (date, destination, duration, purpose, source of funding, tasks);
- Information about work time (attendance and non-attendance).

4.6. Personal data of representatives of contractors include the following information:

- Last Name, First name, Patronymic;
- Details of the document of identification (name, series and number, date of issue of the document, name of the authority that issued the document, division code);
- Date of birth;
- Photo;
- Passport data (series, number, name of the issuing authority and date);
- Registration address;
- Company;
- Position;
- Official e-mail address;
- Business phone number.

4.7. Personal data of visitors to the Operator's territory includes the following information:

- Last Name, First name, Patronymic;
- Company.

4.8. Personal data of the contractors-individuals include the following information:

- Last name, First name, Patronymic;
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- details of the document of identification;
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- duration of work in the company;
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4.9. Personal data of customer representatives includes the following information:

- Last name, First name, Patronymic;
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4.10. Personal data of individual clients includes the following information:

- Last name, First name, Patronymic;
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## **5. Procedure and conditions for processing personal data**

5.1. The Operator receives all personal data directly from the subject of personal data, from his/her representative or from the person who entrusted the Operator with the processing of personal data, except for cases stipulated by the legislation of the Russian Federation.

5.2. Personal data is processed with the consent of the personal data subject, except for cases stipulated by the legislation of the Russian Federation. Consent can be expressed in various forms which allow to confirm the fact of its receipt, including actions implied by conduct. Consent can be expressed in writing in the form of a separate document, or as part of a document signed by the subject. Consent can be given by a representative of the subject, if he or she provides evidence of his or her authority.

5.3. Consent to the processing of personal data may be revoked by the personal data subject. In cases stipulated by the legislation of the Russian Federation, the processing of personal data may be continued even after the subject withdraws consent to processing.

5.4. When making decisions that affect the interests of the subject, the Operator is never predicated on the subject's personal data obtained solely as a result of their automated processing or electronic receipt.

5.5. Personal data is not used for the purpose of causing property and/or moral harm to citizens, hindering the exercise of the rights and freedoms of citizens of the Russian Federation.

5.6. Access to personal data is granted to employees of the Operator who need personal data in connection with the performance of their official duties.

5.7. The transfer of personal data of the Operator's employee to third parties is carried out only with the written consent of the subject, except for cases stipulated by the legislation of the Russian Federation.

5.8. The Operator has the right to transfer personal data to the bodies of inquiry and investigation and other authorized bodies on the grounds provided for by the current legislation of the Russian Federation.

5.9. The Operator has the right to create publicly available sources of personal data, which may include personal data of a data subject with his or her written consent.

5.10. The transfer of personal data of a subject for commercial purposes without his/her written consent is not carried out.

5.11. If it is necessary for the Operator to transfer personal data to third parties, it is carried out only after signing an agreement on non-disclosure of confidential information between the Operator and the third party, except for cases stipulated by the legislation of the Russian Federation.

5.12. The processing of personal data is carried out both with the use of computer engineering means and without it.

5.13. The duration of personal data processing by the Operator is generally determined in accordance with the terms established by Federal law No. 152-FZ of 27.07.2006 "On personal data"; the term of the relevant agreement; the terms specified in the instruction for personal data processing; the terms of the documents established by the order of Federal Agency of Records from 06.10.2000 "A List of typical administrative documents formed in activity of organizations, with instructions of periods of storage", the order of the Ministry of Culture of the Russian Federation dated August 25, 2010 No. 558 "About approval of the List of standard administrative archival documents generated in the course of activities of state bodies, local self-government bodies and organizations with indication of periods of storage"; the period of limitation of actions; the validity of consent given by a subject of personal data processing; as well as other requirements of the legislation of the Russian Federation.

5.14. When processing Personal data without the use of automation tools, they are separated from other information, in particular by fixing them on separate material carriers of personal data (hereinafter referred to as material carriers), in special sections or in fields of forms (forms).

5.15. When recording personal data on material carriers, it is not allowed to record on a single material carrier personal data, the purposes of processing of which are obviously incompatible. For processing of different categories of personal data that is processed without the use of automation tools, a separate material carrier is used for each category of personal data.

5.16. Persons who process personal data without using automation tools must be informed about the fact that they process personal data that is processed by the Operator without using automation tools, the categories of personal data being processed, as well as about the features and rules of such processing.

5.17. When using standard forms filled in by the data subject himself, the nature of information that suggests or permits the inclusion of personal data (hereinafter - the standard), the following conditions are met:

- the standard form or related documents (instruction on its filling, cards, registers and journals) must contain information about the purpose of processing of personal data carried out without the use of automation, name and address of operator, last name, name, patronymic and the address of the data subject, the source of personal data, the period processing personal data, the list of actions with personal data, which will take place in the course of their processing, the General description of the methods used by operator for personal data processing;
- the standard form should provide a field in which the personal data subject can put a mark on his or her consent to the processing of personal data carried out without the use of automation tools, if it is necessary to obtain written consent to the processing of personal data;
- the standard form must be drawn up in such a way that each of the subjects of personal data contained in the document has the opportunity to get acquainted with this or her personal data contained in the document, without violating the rights and legitimate interests of other subjects of personal data;
- the standard form should exclude combining fields intended for entering personal data, the processing purposes of which are obviously incompatible.

5.18. Personal data is to be destructed upon achievement of the processing goals, if it is no longer necessary to achieve them, after the storage period has expired, if the fact of illegal processing is revealed, or at the request of the person who commissioned the processing of personal data within a period not exceeding thirty days from the date of achieving the purpose of

processing personal data, or receiving a response to their processing. Destruction is carried out in the presence of commission. As a result, an act of destruction is drawn up.

## **6. Protection of personal data**

6.1. The Operator protects the subjects' personal data from unauthorized or accidental access to it, destruction, modification, blocking, copying, distribution of personal data, as well as from other illegal actions.

6.2. Protection of personal data is provided by the Operator in accordance with the procedure established by the current legislation of the Russian Federation and local acts of the Operator, by performing a set of organizational and technical measures that ensure their security.

6.3. All security measures meant for collection, processing, storage and transfer of personal data of subjects are applied to both paper and electronic (automated) media.

## **7. Updating, correcting, deleting and destruction of personal data**

7.1. The Operator has the right to add, complement, change, block or delete personal data in accordance with the Federal legislation of the Russian Federation.

7.2. at the request of the personal data subject, the Operator is obliged to:

- provide information about whether the Operator has personal data of a subject;
- provide an opportunity to get acquainted with the personal data of the subject (exception of Federal law 152 article 14 part 5);
- improve incorrect or changed personal data;
- block or destroy personal data if it is illegally obtained, is not necessary for the stated purpose of processing, or the consent of the subject is withdrawn.

7.3. A request of the data subject should be sent to the Operator in paper form and should contain the number of the basic document proving the identity of personal data subject or his or her legal representative, the date of issuance of the document and the issuing authority and the handwritten signature of the personal data subject or his or her legal representative. A standard request form is provided in Annex 1 to this Policy.

7.4. A request may be sent in electronic form and signed with an electronic digital signature in accordance with the legislation of the Russian Federation to the following email address: info@themay.com.

7.5. Upon receipt of a request from a subject, the responsible employee of the Operator is obliged to register such a request in the register of requests from subjects.

7.6. A response or a reasoned refusal must be sent within 10 days after receiving the request from the personal data subject. The response should contain specific and comprehensive

information about the essence of the question.

## **8. Changing of the Policy**

8.1. The Operator reserves the right to make changes in this Policy. When changes are being made, the date when the Policy is updated must be indicated. The new version of the Policy is in effect from the moment it is posted on the Operator's website, unless otherwise provided by the new version of the Policy.

8.2. The current version is stored in the location of the Executive body of the Operator at the following address: 117036, Moscow, 7A Dmitry Ulyanov street, the electronic version of the Policy is kept on the Operator's website: <https://coffesso.it/>.

8.3. This Policy and relations between data subjects and the Operator shall be governed by the law of the Russian Federation.

## **9. Feedback**

9.1. Email address: [info@themay.com](mailto:info@themay.com)

9.2. Postal address: 7A Dmitry Ulyanov street, Moscow, 117036

9.3. Contact phone number: +74957757505