

PERSONAL DATA PROCESSING POLICY

Kaluga, Russia

November 18, 2021

1. General Provisions

- 1.1. This Personal Data Processing Policy (hereinafter referred to as the "Policy") defines the basic principles, goals, conditions and methods of processing personal data by Quattro Motors Rus LLC (hereinafter referred to as the "Operator"), the Operator functions in personal data processing, the rights of personal data subjects, as well as personal data implemented requirements protection.
- 1.2. The Policy has been developed considering the requirements of the Constitution of the Russian Federation, legislative and other regulatory legal acts of the Russian Federation in the field of personal data, including the requirements of Federal Law No. 152-FZ of July 27, 2006 "On Personal Data".
- 1.3. The operator sets the observance of person's and citizen's rights and freedoms in personal data processing as its most important goal and condition for the implementation of its activities, including the protection of the rights to privacy, personal and family secrets.
- 1.4. The Policy applies to all information containing user personal data that the Operator and/or related persons may receive about website visitors: <https://peugeot-motocycles.com.ru/> (hereinafter referred to as the "Website")
- 1.5. The policy is valid indefinitely after approval until replaced by an updated version. The Operator has the right to make changes to the Policy without User's consent and / or notification.
- 1.6. The policy applies to all Operator's employees and persons engaged via civil law contracts, as well as all structural divisions of the Operator, including separate divisions. The Policy requirements are also taken into account and presented with regards to other persons, if it is necessary for their participation in processing the Operator's personal data, as well as in cases of transferring personal data to them in the prescribed manner based on agreements, contracts, instructions for processing.
- 1.7. The Policy is publicly available and posted on the Internet Website at: https://peugeot-motocycles.com.ru/personal_data_processing_policy.pdf
- 1.8. The Subject's Personal Data transfer means the Subject's unconditional consent with the Policy terms and personal data processing conditions specified therein. In case of disagreement with the terms of the Policy, the Personal Data Subject must refrain from transferring personal information to the Operator.
- 1.9. The Policy is an integral part of the User Agreement posted on the Internet Website at: https://peugeot-motocycles.com.ru/user_agreement.pdf

2. Terms and definitions

- 2.1. Personal data refers to any information relating directly or indirectly to a specific or identifiable subject of personal data.
- 2.2. Website refers to a set of graphic and information materials, as well as computer programs and databases that ensure their availability on the internet website at: <https://peugeot-motocycles.com.ru/> and on all subdomains created on its basis.
- 2.3. Personal data processing refers to any action (operation) or set of actions (operations) performed using automation tools or without using such tools towards personal data: collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction.
- 2.4. Personal data automated processing refers to personal data processing using computer technology.
- 2.5. Dissemination of personal data refers to actions aimed at disclosing personal data to an indefinite circle of persons.
- 2.6. Providing personal data refers to actions aimed at disclosing personal data to a certain person or a certain circle of persons.

- 2.7. Personal data blocking is a temporary suspension of personal data processing (unless the processing is necessary to clarify personal data).
- 2.8. Destruction of personal data refers to actions, as a result of which it becomes impossible to restore the content of personal data in the personal data information system and / or as a result of which material carriers of personal data are destroyed.
- 2.9. Depersonalization of personal data refers to actions, as a result of which it becomes impossible to determine the ownership of personal data by a specific subject of personal data without the use of additional information.
- 2.10. Personal data information system refers to a set of personal data contained in databases and information technologies and technical means that ensure their processing.
- 2.11. Cross-border transfer of personal data is the transfer of personal data to the territory of a foreign state to a foreign state authority, a foreign individual or a foreign legal entity.
- 2.12. Operator refers to a state body, municipal body, legal entity or individual, independently or jointly with other persons organizing and / or carrying out personal data processing, as well as determining the purposes of personal data processing, the composition of personal data to be processed, actions (operations) performed towards personal data. Within the framework of the Policy, the Operator is Quattro Motors Rus LLC.
- 2.13. The subject of personal data (Subject) is an individual whom the relevant personal data relates to.
- 2.14. The User is a subject of personal data viewing the content of the Website and / or using the functionality of the website.
- 2.15. Cookies - a small piece of data sent by a web service and stored on the computer of the Personal Data Subject, which the browser sends to the web server in an HTTP request each time it tries to open the page of the corresponding website.
- 2.16. IP address is a unique network node address in a computer network through which the Personal Data Subject gains access to the Website.

3. Purposes and principles of personal data processing

- 3.1. The purposes of processing personal data are:
- answering questions sent by the Subject using the web form on the website;
 - organization of calls to the Subject's telephone number;
 - ensuring the website operability and security, providing the User with effective client and technical support in case of problems associated with the use of the website;
 - marketing, analytical and statistical research related to PEUGEOT vehicles distribution, the provision of services for their maintenance and repair;
 - signing, execution and termination of civil law contracts with the Operator;
 - providing the User with access to the services, information and/or materials contained on the website.
 - notifying the User on updating services, information and / or materials contained on the website, as well as new products and services, special offers and various events. The User can always refuse to receive informational messages by sending an email to the Operator at info@4motors.ru noted "New products, services and special offers notification refusal".
- 3.2. The operator is guided by the following principles:
- legal and fair basis for personal data processing;
 - personal data processing in accordance with the legislation of the Russian Federation, as well as specific legitimate purposes predetermined by the Policy;
 - preventing the merger of databases containing personal data, processing of which is carried out for purposes that are incompatible with each other;
 - personal data content and scope compliance with the stated purposes of processing;

- accuracy, sufficiency, relevance and reliability of personal data;
- legality of technical measures aimed at personal data processing;
- reasonableness and expediency of personal data processing;
- personal data storage no longer than required by the processing purposes or during the User consent period

4. List of personal data consented for processing

- 4.1. Within the Policy, the following personal data may be processed:
- 4.1.1. Personal information that the User provides about himself independently while using the website services: last name, first name, patronymic, phone number, email address, date and place of birth;
- 4.1.2. Information obtained as a result of the User's actions on the website, including applying for a test drive, reviews and questions;
- 4.1.3. Information, including data that is automatically transmitted to the website services in the course of their use via the software installed on the User's device, including ip-address, cookie data, individual device network number (MAC address, device ID), electronic serial number (IMEI, MEID), information about the browser, operating system, access time, location information; the source of website access; website or advertisement; User's search queries and other similar information.

5. Personal data processing order

- 5.1. The collection of personal data is carried out in the following ways:
- 5.1.1. User providing personal data filling out web forms on the website and using the website Services;
- 5.1.2. Automatic collection of information about the User using technologies and services, including: web protocols, cookies, web marks.
- 5.2. With regards to the User's personal data, confidentiality is maintained, except in cases where the User voluntarily provides information about himself for general access to an unlimited number of persons.
- 5.3. The User's personal data is stored exclusively on electronic media and processed using automated systems, except when non-automated processing of personal data is necessary in connection with the fulfillment of legal requirements.
- 5.4. Processing the User's personal data, the Operator ensures the use of databases located on the territory of the Russian Federation.
- 5.5. The Operator does not transfer personal data to third parties without the User's consent, except in cases where the transfer is carried out to ensure compliance with the requirements of the legislation of the Russian Federation.

The Operator transfers the Users' personal data (last name, first name, telephone number, email address, date and place of birth) to the following third party:

Name: PJSC "MegaFon" (OGRN: 1027809169585, TIN: 7812014560, legal address: 127006, 41 Oruzheyiny lane, Moscow, Russian Federation,), which provides the Operator with the SMS mailing service.

- 5.6. The processed personal data is subject to destruction or depersonalization after 12 (Twelve) months after the achievement of the processing purposes or in case of loss of the need to achieve these purposes.
- 5.7. The destruction of the User's personal data is carried out in the following cases:
- If there is a threat to the security of the website;
 - Upon expiration of the personal data storage period;
 - At the User's request.

6. Consent to personal data processing

- 6.1. The User decides to provide the Operator with his personal data freely, by his own good will and in his own interest.
- 6.2. Using the Site, providing personal data in web forms on the Site and clicking the "I agree / agree with the terms of the Policy" button, the User expresses his consent and gives permission to process his personal data in the manner prescribed by the Policy.
- 6.3. Consent to personal data processing may be withdrawn by the Subject of personal data in the manner prescribed by section 10 of the Policy.

7. The Parties Commitments

- 7.1. The user is obliged:
 - to provide reliable information about personal data necessary to use the Site;
 - to express consent to personal data processing in the manner prescribed by clause 6.2. of the Policy;
 - to update and supplement the provided personal data information in case of changes in this information.
- 7.2. The user has the right to receive information on personal data processing including the following:
 - confirmation of the fact of personal data processing;
 - legal grounds for the processing of personal data;
 - the purposes and methods of processing personal data used by the Operator;
 - processed personal data relating to the relevant Subject, the source of its receipt, unless a different procedure for the provision of such data is provided for by the legislation of the Russian Federation;
 - the terms of personal data processing, including the terms of its storage;
 - the right exercising order provided for by the legislation of the Russian Federation;
 - information on performed or proposed cross-border data transfer;
 - information on persons to whom personal data may be disclosed via an agreement with the Operator or in accordance with the legislation of the Russian Federation;
 - naming or last name, first name, patronymic and address of the person who processes personal data on behalf of the Operator, if the processing is or will be entrusted to such a person;
 - other information stipulated by the legislation of the Russian Federation.
- 7.3. The user has the right to receive the information specified in clause 7.2. of the Policy, for an unlimited number of times, sending the appropriate request to the Operator in the manner prescribed by section 10 of the Policy.
- 7.4. The operator is obliged:
 - use personal data solely for the purposes specified in the Policy;
 - provide, at the User's request, information on his personal data processing specified in clause 7.2. Policies, or a justified refusal;
 - take measures necessary and sufficient to ensure the fulfillment of the obligations prescribed by law;
 - ensure the legitimacy of personal data processing. If it is impossible to ensure the legitimacy of personal data processing, the Operator, within a period not exceeding 10 (ten) business days from the date of detection of illegal personal data processing, is obliged to destroy or ensure its destruction;
 - at the User's request, clarify the processed personal data, block or delete it if it's incomplete, outdated, inaccurate, illegally obtained or unnecessary for the stated purpose of processing;
 - immediately inform the User about his personal data loss or disclosure;
 - in case of User's withdrawal of consent to personal data processing, stop processing data and destroy it within a period not exceeding 30 calendar days from the date of receipt of the respective withdrawal, except cases when processing can be continued in accordance with the law.

8. Personal data protection

8.1. The Operator implements legal, organizational and technical measures necessary and sufficient to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

8.2. The legal measures implemented by the Operator in order to protect personal data include:

- development of Operator’s local acts that implement the requirements of Russian legislation, including the Policy, and posting them on the website;
- refusal of any methods of processing personal data that do not correspond with the purposes predetermined by the Operator.

8.3. The organizational and technical measures implemented by the Operator in order to protect personal data include:

- appointing a person responsible for personal data processing organization;
- limiting the number of the Operator's employees having access to personal data;
- personal data permissive access system organization;
- getting the Operator's employees familiar with the provisions of the legislation of the Russian Federation on personal data, including the personal data protection requirements, the Operator’s local acts on personal data processing, training these employees.

9. Policy execution restriction

9.1. The Policy applies exclusively to the website and does not apply to other Internet resources, including those links to which are available on the website.

9.2. The User is obliged to reasonably and responsibly approach his own personal data placement on the website in public domain, including when leaving a review.

9.3. The Operator is not responsible for the actions of third parties who have gained access to the User's personal data through the fault of the latter.

10. Final provisions

10.1. The User can receive any kind of clarifications on issues of interest regarding his personal data processing by contacting the Operator via e-mail: info@4motors.ru or in writing at: 248031, Russia, Kaluga region, Kaluga, 8 Baikonurskaya street, office 203.

10.2. The User's request is to contain the following information:

- details of the User’s identity document, including its series and number, date of issue and the authority that issued it;
- information confirming the User’s relationship with the Operator;
- the User’s signature.

10.3. The Operator undertakes to consider and send a response to the request received within 30 days from the date of receipt of the request.

10.4. All correspondence received by the Operator from the User in written or electronic form refers to information of limited access and is not disclosed without written consent.

10.5. The Operator and its authorized dealers are separate legal entities, in connection with which the Operator is not responsible for non-compliance with the legislation in the field of personal data processing by these legal entities.

10.6. The Operator is included in the Register of Personal Data Operators, under the registration No. 40-2-002014

11. Operator’s Contacts and Banking info

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