

## **Personal Data Processing Policy for stalogistic.com, stalogistic.ru websites**

This Personal Data Processing Policy (hereinafter – the Policy) determines the conditions for personal data processing at stalogistic.com, stalogistic.ru websites by STA LOGISTIC Limited Liability Company registered at the address: 25/3 V. Khoruzhey St., isolated facility No. 3, Minsk, Republic of Belarus, 220123, TIN – 190471006 (hereinafter referred to as the “Operator”, “we”, “us”, “our”).

This Policy was developed in accordance with Federal Law No. 152-FZ dated July 27, 2006 “On Personal Data” for the purpose of protecting the rights and freedoms of individuals and citizens in the processing of their personal data, including the protection of privacy, personal and family secrets.

### **Terms and definitions**

Personal data – any information relating to a directly or indirectly identified or identifiable individual.

Personal data subject – a person whose data is being processed.

Operator – a person or entity who independently or jointly with other persons/entities organizes and/or carries out processing of personal data, as well as determines the purposes of personal data processing, composition of personal data subject to processing, actions (operations) performed with personal data.

Processing of personal data – any action (operation) or set of actions (operations) with personal data, with or without the use of automation means, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data.

Automated processing of personal data – computer-aided personal data processing.

Dissemination of personal data – actions aimed at disclosure of personal data to an indefinite range of persons.

Provision of personal data – actions aimed at disclosure of personal data to a specific person or a specific range of persons.

Blocking of personal data – temporary cessation of personal data processing (except for cases when processing is necessary to rectify personal data).

Destruction of personal data – actions leading to impossibility to restore the content of personal data in the personal data information system and/or resulting in destruction of physical media on which personal data is stored.

Anonymization of personal data – actions leading to impossibility to determine the belonging of personal data to a particular personal data subject without using additional information.

Personal data information system – personal data contained in databases and information technologies and technical means ensuring its processing taken together.

Cross-border transfer of personal data – transfer of personal data to a foreign country to an authority of a foreign country, a foreign individual or a foreign legal entity.

### Personal data processing conditions

- We do not process special and biometric personal data;
- Our website is not designed for processing personal data of minors;
- Personal data processing is automated;
- We maintain the confidentiality of personal data by using technical means and organizational measures in accordance with Articles 18, 18.1, 19 of Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006;
- We receive your personal data, which you have consented to have processed;
- In the event that personal data of third parties is transferred to us, the website user is an independent data controller with respect to such third party data, and is responsible for notification as stipulated by part 3 of Art. 18 of Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006 and their consent to the transfer of data to us.

### Which personal data and for which purposes we process

Purpose of processing	List of personal data	Subject category	Time period of processing and storage
<b>For requesting the rate</b>	Surname First name Email address Telephone Name of the representative's company	Company representative	Until rate quotation on request <i>Or</i> Until the beginning of pre-contractual, contractual relations with us
<b>For receiving feedback</b>	First name Email address Telephone Name of the representative's company	Company representative	Until provision of feedback on request <i>Or</i> Until the beginning of pre-contractual, contractual relations with us
<b>For email marketing:</b>	First name Email address	Company representative	Until you unsubscribe

<p><b>For sending CVs</b></p>	<p>City of residence</p> <p>Email address</p> <p>CV information (surname, first name, patronymic; year of birth; month of birth; date of birth; marital status; gender; telephone number; citizenship; employment information (profession; position; place of work; work experience); information on education (name of higher education institution, year of graduation, faculty, specialization, level of education); photo)</p>	<p>Candidate</p>	<p>Within 3 months after decision to deny employment</p> <p><i>Or</i></p> <p>Within 5 years after inclusion into the personnel reserve</p> <p><i>Or</i></p> <p>Until the start of employment relations, if a decision to hire is taken</p>
<p><b>For sending an application form</b></p>	<p>Surname</p> <p>Name</p> <p>Patronymic</p> <p>City of residence</p> <p>Email address</p> <p>Telephone</p> <p>Date, month, year of birth</p> <p>Family information (whether you are married or not, number of children)</p> <p>Photo</p> <p>Current or previous place of work</p>	<p>Candidate</p>	<p>Within 3 months after decision to deny employment</p> <p><i>Or</i></p> <p>Within 5 years after inclusion into the personnel reserve</p> <p><i>Or</i></p> <p>Until the start of employment relations, if a decision to hire is taken</p>
	<p>Surname</p> <p>First name</p> <p>Position</p> <p>Company name</p>	<p>Representatives of the candidate's previous place of work</p>	<p>Until receipt of a letter or reference</p>

	Telephone		
<b>For filing an application for internship</b>	Surname First name Patronymic Telephone Email address City of residence Information about education (speciality/area)	Students	Until a decision is taken to deny internship  <i>Or</i> Within 3 years after the end of internship
	Surname First name Patronymic Email address Telephone	Participant of the referral program	Until refusal from the recommended candidate is received  <i>Or</i> Until the recommended candidate successfully completes the probation period
<b>For participation in the referral program</b>	Surname First name Patronymic Position Email address Telephone	Candidate recommended by the participant of the referral program	Until refusal from the candidate is received  <i>Or</i> Within 3 months after decision to deny employment  <i>Or</i> Within 5 years after inclusion into the personnel reserve  <i>Or</i> Until the end of employment relations, if a decision to hire is taken

<b>For the corporate blog, including posting news about the company's employees celebrating a jubilee, corporate events, publications about feedback, internships, etc.</b>	Surname	Employees Students	Until the website ceases to exist  Or Until the subject revokes the consent to dissemination of personal data
	First name		
	Position		
	Email address		
	Photo		

## Cookies

At our website, we use Cookies, which are also classified as personal data.

Cookies are small fragments of text or fragments of data that your device stores when you visit websites.

We use cookies to enable our website to function as intended by us.

You can change how cookies are used in your browser settings.

Strictly necessary (technical) cookies	
Name	Description
BITRIX_SM_LOGIN	Stores information about the website user's login
PHPSEED	Stores the session variable by which the user is identified
BITRIX_SM_ACCEPT_COOKIE	Is set by the site management system for correct operation of services on the website
BITRIX_SM_SOUND_LOGIN_PLAYED	

Statistical, analytical, and marketing cookies		
Name	Validity term	Description
_ym_metrika_enabled	60 minutes	Checks if other Yandex.Metrics cookies are set correctly
_ym_isad	2 days	Used to determine if a visitor has ad blockers enabled
_ym_uid	1 year	Allows to differentiate between users
_ym_d		Stores the date of the user's first visit to the website
_ym_visorc_	30 minutes	Used for correct operation of Webvisor
yabs-sid	During the visit	Visit identifier
yashr	1 year	Yandex.Metrics information
yuidss	1 year	Allows to differentiate between users
i		
yandexuid		
yp	1 year	Yandex.Metrics information
ymex	1 year	Stores auxiliary information for Metrics operation: time of identifier creation and their alternative values.
gdpr	Up to 2 years	Allows to identify visitors from the area covered by the General Data Protection Regulation (GDPR)
is_gdpr		
is_gdpr_b		

## With whom we share your personal data

Purpose of processing	Third party's name:	Contact data:
For requesting the rate For receiving feedback For sending CVs For sending CVs For sending an application form For filing an application for internship For participation in the referral program	STA LOGISTIC BALTIC LLC (TIN – 7840500146)	2nd Sovetskaya St., 17, letter A, office 12-N, St. Petersburg, Russian Federation, 191036 +7 (812) 336-74-65 data_privacy_ru@stalogistic.com
	STA LOGISTIC CENTRE LLC (TIN – 1655340151)	Volkov Street, 59, office 41, Kazan, Republic of Tatarstan (Tatarstan), 420012 + 7 (347) 226 44 81 data_privacy_ru@stalogistic.com
	STA Logistic LLC (TIN – 7734620321)	Butyrskaya Street, 77, 10th floor, Moscow, Russian Federation, 127015 +7 (495) 620-99-09 data_privacy_ru@stalogistic.com
For web analytics	YANDEX LLC (TIN – 7736207543)	Lev Tolstoy Street, 16, Moscow, Russia, 119021
For email marketing	UNISENDER SMART LLC (TIN – 9731091240)	Bolshaya Novodmitrovskaya Street, 23, facility 2/46, Butyrsky Municipal District, Moscow, 127015
For hosting	REG.RU LLC (TIN – 7733568767)	Leningradsky Ave., 72/3, Airport internal administrative district, Moscow, 125315 info@reg.ru

## Personal data subject's rights

In accordance with Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006, you have:

1. The right to **access the information** about:
  - Confirmation of the fact of personal data processing by the operator;
  - Legal bases and purposes of personal data processing;
  - Purposes and methods of personal data processing applied by the operator;
  - Name and location of the operator, information about persons (except for the operator's employees) who have access to personal data or to whom personal data may be disclosed on the basis of a contract with the operator or on the basis of federal law;
  - Processed personal data, the source from which it was obtained, unless another procedure for submission of such data is provided by the Law on Personal Data;
  - Time periods of personal data processing, including the time periods of its storage;
  - How the personal data subject can exercise the rights provided by the Law on Personal Data;
  - Information on completed or suspected cross-border data transfers;

- Name of the entity or surname, first name, patronymic and address of the individual who processes personal data on behalf of the operator;
- Information on the ways in which the operator fulfils the obligations established by Article 18.1 of the Law on Personal Data;
- Other information stipulated by the Law on Personal Data or other federal laws;

2. The right to **demand**:

- Rectification;
- Blocking;
- Destruction

of personal data if it is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing by sending a request to the Operator;

3. The right to **object** to our actions or inaction;
4. The right to **revoke** consent;
5. The right to **have their rights and legal interests protected**, including compensation of losses and/or compensation for moral harm through the courts.

### **How to exercise your rights**

You can exercise your rights by sending us a request (message) or revocation of consent:

a) to the postal address: 25/3 V. Khoruzhey St., Minsk, Republic of Belarus, 220123

b) to the email address: [data\\_privacy\\_ru@stalogistic.com](mailto:data_privacy_ru@stalogistic.com)

The request is prepared by the subject in any form. According to part 7 of Article 14 of Federal Law No. 152-FZ "On Personal Data" dated July 27, 2006, the request must contain:

- The number of the primary identity document of personal data subject or his/her representative,
- Information about the issue date of such document and its issuing authority,
- Information confirming the participation of the personal data subject in relations with the operator (contract number, date of contract conclusion, verbal designation and/or other information), or information otherwise confirming the fact of personal data processing by the operator,
- Signature of the personal data subject or his/her representative.

## Personal data destruction

Item No.	Bases for destruction of personal data	Time limit for data destruction
1	Personal data is incomplete, outdated, inaccurate, illegally obtained or excessive	7 business days from the confirmation of unauthorized processing
2	The subject's request to stop processing (destruct) personal data	10* business days since the request *may be extended for 5 business days
3	The subject's revocation of the consent to dissemination of his/her personal data or No further need to achieve the purpose	30 calendar days after the receipt of the request
4	Achievement of the purposes of of personal data processing	30 calendar days after the achievement of the purpose
5	Unauthorized processing of personal data	10 business days after

The Operator has the right to block personal data for a period not exceeding 6 months if it is not possible to destroy it in the presence of bases 2 to 5.

The operator has the right to continue processing personal data if there are other lawful bases for processing.

Personal data shall be destroyed by irretrievable deletion from the Operator's information systems.

## Final provisions

The Policy shall be subject to change, amendment in case its provisions become obsolete, inaccurate, misleading or not in compliance with the current legislation of the Russian Federation.

If the Policy is amended, the Operator shall make changes unilaterally and post the current version on the website with the date of update. The policy shall be effective as of the date indicated on the website.

Please regularly check the Policy at our website for updates.