## **Privacy policy**

## Personal Data Processing Policy

## 1. General provisions

This personal data processing policy has been drawn up in accordance with the requirements of Federal Law No. 152-FZ dated 27.07.2006 "On Personal Data" and defines the procedure for processing personal data and measures to ensure the security of personal data taken by «Ingrideal» FZCO (hereinafter referred to as the Operator).

- 1.1. The Operator sets as its most important goal and condition for the implementation of its activities the observance of human and civil rights and freedoms when processing his personal data, including the protection of the rights to privacy, personal and family secrets.
- 1.2. This Operator's policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator can receive about website visitors. https://ingrideal.com.
- 2. Basic concepts used in the Policy
- 2.1. Automated personal data processing processing of personal data using computer technology;
- 2.2. Blocking of personal data temporary termination of the processing of personal data (except in cases where the processing is necessary to clarify personal data);
- 2.3. Website a set of graphic and informational materials, as well as computer programs and databases that ensure their availability on the Internet at a network address https://ingrideal.com :
- 2.4. Personal data information system a set of personal data contained in databases and information technologies and technical means that ensure their processing;
- 2.5. Depersonalization of personal data actions as a result of which it is impossible to determine without using additional information whether personal data belongs to a specific User or another personal data subject;
- 2.6. Personal data processing is any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording,

systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;

- 2.7. Operator a state body, municipal body, legal entity or individual who independently or jointly with other persons organize and (or) process personal data, as well as determine the purposes of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data;
- 2.8. Personal data any information related directly or indirectly to a specific or identifiable User of the website https://ingrideal.com;
- 2.9. User any visitor to the website https://ingrideal.com;
- 2.10. Provision of personal data actions aimed at disclosing personal data to a specific person or a specific circle of people;
- 2.11. Dissemination of personal data any actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or at familiarizing with personal data of an unlimited number of persons, including the publication of personal data in the media, posting in information and telecommunication networks or providing access to personal data in any other way;
- 2.12. Cross-border transfer of personal data is the transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity;
- 2.13. Destruction of personal data any actions as a result of which personal data is permanently destroyed with the impossibility of further restoration of the content of personal data in the personal data information system and (or) the material carriers of personal data are destroyed.
- 3. The Operator may process the following personal data of the User
- 3.1. Last name, first name, patronymic;
- 3.2. Email address;
- 3.3. Phone numbers;
- 3.4. Also on site is the collection and processing of anonymous data about visitors (including cookies) using Internet statistics (Yandex Metric and Google Analytics and others).
- 3.5. The above data hereinafter Policy United by the General concept of Personal data.

3.6. The Operator forms compositions of personal data obtained as a result of depersonalization of users' personal data, grouped according to a specific attribute, provided that subsequent processing of such data does not allow determining whether such data belongs to a specific personal data subject (hereinafter referred to as data compositions).

## 4. Purposes of personal data processing

- 4.1. The purpose of processing the User's personal data is to inform the User by sending emails; to conclude, execute and terminate civil law contracts; to provide the User with access to the services, information and/or materials contained on the website.
- 4.2. The Operator also has the right to send notifications to the User about new products and services, special offers and various events. The User can always refuse to receive information messages by sending an email to the Operator. info@ingrideal.ae marked "Refusal of notifications about new products and services and special offers".
- 4.3. Depersonalized User data collected through Internet statistics services is used to collect information about User actions on the site, improve the quality of the site and its content.
- 5. Legal grounds for processing personal data
- 5.1. The Operator processes the User's personal data only if they are filled in and/or sent by the User independently through special forms located on the website https://ingrideal.com . By filling out the appropriate forms and/or sending their personal data to the Operator, the User agrees with this Policy.
- 5.2. The Operator processes depersonalized User data if this is allowed in the User's browser settings (the storage of cookies and the use of JavaScript technology are enabled).
- 6. The procedure for collecting, storing, transferring and other types of personal data processing The security of personal data processed by the Operator is ensured through the implementation of legal, organizational and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.
- 6.1. The Operator ensures the safety of personal data and takes all possible measures to exclude access to personal data of unauthorized persons.
- 6.2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of current legislation.
- 6.3. In case of inaccuracies in personal data, the User can update them independently by sending

a notification to the Operator's email address. info@ingrideal.ae marked "Updating personal data".

- 6.4. The period of personal data processing is unlimited. The User can revoke his consent to the processing of personal data at any time by sending an e-mail notification to the Operator's e-mail address. info@ingrideal.ae marked "Withdrawal of consent to the processing of personal data".
- 7. Cross-border transfer of personal data
- 7.1. Prior to the start of the cross-border transfer of personal data, the Operator must ensure that the foreign state into whose territory the transfer of personal data is to be carried out ensures reliable protection of the rights of personal data subjects.
- 7.2. The cross-border transfer of personal data on the territory of foreign states that do not meet the above requirements may be carried out only if the personal data subject agrees in writing to the cross-border transfer of his personal data and/or the execution of an agreement to which the personal data subject is a party.
- 8. Final provisions
- 8.1. The User can receive any clarifications on issues of interest related to the processing of his personal data by contacting the Operator by e-mail info@ingrideal.ae.
- 8.2. This document will reflect any changes to the Operator's personal data processing policy. The policy is valid indefinitely until it is replaced by a new version.
- 8.3. The current version of the Policy is freely available on the Internet at ingrideal.com