

Privacy and Personal Data Processing Policy

Moscow

June 29, 2017

This Personal Data Privacy Policy (the "Privacy Policy") applies to all information posted on the official website of the online store at <https://shm-store.com/> (the Website) and all services posted on the Website or presented there as active links to be followed, which the Administration and visitors to the Website can obtain about the User when he/she is using the Website and its services.

By using the services on the Website, the User unconditionally accepts this Policy and the terms and conditions of processing of their personal data specified therein; in case of disagreement with these conditions, the User should refrain from using the services.

1. GENERAL PROVISIONS

1.1. For the purpose of this Policy, the "User Personal Information" means:

1.1.1. Personal information that the User independently provides about himself/herself when registering (creating an account) or in the process of using the Services (order placement, subscription to the mailing list, filling out the feedback form and the "Call me back" form), including the User's personal data. The information required for the provision of Services is distinctly marked. Other information is provided by the User in its sole discretion. The personal information, in particular, includes: surname, name, patronymic, e-mail, phone number, address.

1.1.2. Data that is automatically transferred to the Website's Services in the course of their use with the software installed on User's devices, including IP addresses, cookie data, information about the User's browser (or in other programs, by means of which the Services are accessed), technical characteristics of the equipment and software used by the User, the date and time of accessing the services, addresses of requested pages and other similar information.

1.1.3. This Privacy Policy applies only to the official website of the online store on the Internet at <https://shm-store.com/> (the Website), and all of its services posted on the Website or listed on it as active links to be followed. Website <https://shm-store.com/> and all its services posted on the Website or presented on it in the form of active links intended for following does not control and is not responsible for websites of third parties to which the User can navigate following the links available on Website <https://shm-store.com/> and all of its services.

1.1.4. This Policy has been prepared in accordance with clause 2, Part 1, Article 18.1 of the Federal Law of the Russian Federation "On Personal Data" No. 152-FZ dated July 27, 2006 (the "Law") and defines the position of legal entity, Museum Plus Limited Liability Company (TIN 7701402053, CRR 772201001, OGRN 1147746825907, having its registered office at: 12 Aviamotornaya St., floor 5, office 519, Moscow 111024) and/or its affiliates (the "Company") in personal data processing and protection (the "Data"), respect for the rights and freedoms of each individual and, in particular, the right to privacy, personal and family secrets.

1.1.5. This Policy complies with Regulation (EU) 2016/679 of the European Parliament and of the Council of the European Union "On the Protection of Natural Persons with Regard to the Processing of Personal Data and on the Free Movement of Such Data", and repealing Directive 95/46/EC (General Data Protection Regulation) (adopted in Brussels on April 27, 2016).

2. PURPOSES OF USER PERSONAL INFORMATION PROCESSING

2.1. The website collects and stores only the personal information needed to provide services or perform agreements and contracts with the User, except in cases where the law provides for the mandatory storage of personal information for a period specified by law.

2.2. The Website processes the User's Personal Information for the following purposes:

2.2.1. Identification of a User registered on the Website to provide him/her with information about the Company's services and with services, if they are provided electronically.

2.2.2. Granting the User access to the personalized resources of the Website.

- 2.2.3. Receiving feedback from the User, including sending notifications, requests concerning the use of the Website, provision of services, processing requests and applications from the User.
- 2.2.4. Determining the location of the User to ensure security, prevent fraud.
- 2.2.5. Verification of the accuracy and completeness of personal data provided by the User.
- 2.2.6. Creating an account to provide information about the Company's services and services, if they are provided electronically, subject to the User's consent to creating the account.
- 2.2.7. Informing the User of the Website about promotions, sales of the online store, and other events by means of personalized electronic mailing, subject to the User's consent to receiving such mailing.
- 2.2.8. Providing the User with effective customer and technical support in the event of any problems related to the use of the Website.
- 2.2.9. Promotional activities subject to the User's consent.
- 2.2.10. Measures aimed at improving the work and customer service quality.
- 2.2.11. Performance of contracts, including those concluded remotely on the Website, provision of paid services, provision of services, as well as accounting of services rendered to the User for mutual settlements.
- 2.2.12. Other activities in accordance with the Company's Charter and the law, which require obtaining personal data from the User of the Website.

3. CONDITIONS FOR PROCESSING OF USER'S PERSONAL DATA AND THEIR DISCLOSURE TO THIRD PARTIES

- 3.1. The Website stores the personal information of users in accordance with the internal regulations of specific services.
- 3.2. The confidentiality of the User's personal data is preserved unless he or she voluntarily makes personal information publicly available. When using certain services, the User agrees that a certain part of his/her personal information becomes publicly available.
- 3.3. The Website shall be entitled to disclose the User Personal Information to third parties in the following cases:
 - 3.3.1. The User has expressed his/her consent to such actions (subscription to the Pushkin State Museum of Fine Arts newsletter).
 - 3.3.2. The disclosure is necessary for the User to use a certain service or perform a certain agreement or contract entered into with the User (services for the delivery of orders be the delivery service to the customer pickup point or at the address specified by the User).
 - 3.3.3. The disclosure is provided for by the Russian or other applicable law within the framework of the procedure established under the law.
- 3.4. Personal data of the User shall be processed without any time limits by any lawful means, including in personal data information systems with or without the use of automation means. Personal data of Users shall be processed in accordance with Federal Law No. 152-FZ "On Personal Data" dd. July 27, 2006. Data processing operations include: collection, recording, systematization, accumulation, storage, refinement (update, change), extraction, use, disclosure (distribution, provision, access), anonymization, blocking, deletion, destruction of Data.
- 3.5. In case of loss or disclosure of personal data, the Administration of the Website shall inform the User about the loss or disclosure of personal data.
- 3.6. The Administration of the Website shall take all necessary organizational and technical steps to protect the User Personal Information from misuse or accidental access, destruction, modification, blocking, copying, distribution, and other illegal actions of third parties.
- 3.7. The Administration of the Website, together with the User, shall take all necessary steps to prevent losses or other negative consequences caused by the loss or disclosure of the User's personal data.
- 3.8. Terms of data processing (retention) depend on data processing purposes, in accordance with the term of the agreement entered into with the data subject, the requirements of federal laws, the requirements of the data operators on whose instructions the Company processes the Data, the basic rules of organizations' archives, limitation of action periods. Data that is past its processing (retention) period shall be destroyed, unless otherwise provided for by federal law. The processed Data may be stored only after their anonymization.

4. OBLIGATIONS

- 4.1. The User shall:
- 4.1.1. Provide the personal data required to use the Website.
 - 4.1.2. Update, supplement the provided personal data in the event of any changes in this information.
- 4.2. The Administration of the Website shall:
- 4.2.1. Use the information obtained solely for the purposes specified in this Privacy Policy.
 - 4.2.2. Keep confidential information in secret, not disclose it without the prior written permission of the User, or sell, exchange, publish or disclose other personal data of the User, except as provided for in this Privacy Policy.
 - 4.2.3. Protect the confidentiality of the User's personal data under the procedure normally used to protect this kind of information in the existing business practices.
 - 4.2.4. Block personal data related to the relevant User from the moment of the application or request of the User or his/her legal representative or authorized body for the protection of the rights of personal data subjects for the duration of inquiry in case unreliable personal data or misconduct has been revealed.

5. RESPONSIBILITY

- 5.1. The Administration of the Website in default of its obligation shall be liable for losses incurred by the User in connection with the unlawful use of personal data in accordance with the legislation of the Russian Federation.
- 5.2. In case of loss or disclosure of the Confidential Information, the Administration of the Website shall not be liable, if such Confidential Information:
- 5.2.1. was publicly available prior to its loss or disclosure.
 - 5.2.2. was received from a third party prior to its receipt by the Website Administration.
 - 5.2.3. has been disclosed with the consent of the User.

6. DISPUTE RESOLUTION

- 6.1. Prior to filing a lawsuit in disputes arising from the relationship between the Website User and the Website Administration, a claim (a written proposal of amicable dispute settlement) must be presented.
- 6.2. The recipient of the claim shall, within 20 calendar days from the date of receipt of the claim, notify the claimant in writing of the results of the consideration of the claim.
- 6.3. In case of failure to reach an agreement, the dispute shall be referred to the court in accordance with the applicable law of the Russian Federation.
- 6.4. This Privacy Policy and the relationship between the User and the Website Administration are subject to the applicable law of the Russian Federation.

7. ADDITIONAL TERMS AND CONDITIONS

- 7.1. The Website Administration has the right to modify this Privacy Policy without the User's consent.
- 7.2. The new Privacy Policy shall become effective on the date of its publication on the Website, unless otherwise provided by the new version of the Privacy Policy.
- 7.3. All suggestions or questions on this Privacy Policy shall be sent using the online store feedback form posted at <https://shm-store.com/forms/obratnaya-svyaz/index.php>.
- 7.4. The current Privacy Policy is located on the page at <https://shm-store.ru/about/politika-konfidentsialnosti.php>.
- 7.5. By using this Website, you accept this Policy. If you do not agree with this policy, please do not use our Website. Your continued use of the Website after changes to this policy will be considered as your acceptance of these changes.

7.6. The User of the Website may at any time withdraw his/her consent to the processing of Data by sending an e-mail using the online store feedback form at <https://shm-store.com/forms/obratnaya-svyaz/index.php>, or by a written notice to the Company at 12 Aviamotornaya St., floor 5, office 519, Moscow 111024. Upon receipt of such a message, the processing of User Data will be discontinued and his/her Data will be deleted, except for cases where processing may be continued under the law.

7.7. The Company does not process the data relating to race, nationality, political views, religious, philosophical and other beliefs, intimate life, membership in public associations, including in trade unions, biometric data (information that characterizes the physiological and biological traits of a person, on the basis of which his/her identity can be established and which are used by the operator to identify the subject).

7.8. The Company does not provide cross-border Data transfer.

7.9. This Policy is a bylaw of the Company. This Policy is publicly available. The general availability of this Policy is ensured by the publication on the Website of the online store in accordance with clause 7.4. This Policy may be revised in any of the following cases: a change in personal data processing and protection laws of the Russian Federation; in cases of receiving orders from the competent public authorities to eliminate inconsistencies affecting the scope of the Policy; by decision of the Company's management; in case of any change in the purposes and time frame of data processing; in case of a change in the organizational structure, the structure of information and/or telecommunication systems (or the introduction of new systems); when applying new Data processing and protecting technologies (including transfer, storage); when the need arises to modify the process of treatment of Data related to the Company activities.