The Privacy Policy of Personal Data (hereinafter referred to as the Privacy Policy) applies to all information that can be gathered about the User during usage of the site DDA Real Estate placed on the domain name dda-re.com.

## 1. TERMS DEFINITION

- 1.1. The following terms are used in the Privacy Policy:
- 1.1.1. «Site Administration (hereinafter referred to as the Site Administration)» authorized employees to manage the site, acting on behalf of the name of the organization that organizes and (or) carries out the processing of personal data and also determines the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data.
- 1.1.2. «Personal data» any information relating to a directly or indirectly identified or identifiable individual (subject of personal data).
- 1.1.3. «Processing of personal data» any action (operation) or set of actions (operations) performed using automation tools or without the use of such means with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.
- 1.1.4. «Confidentiality of personal data» a mandatory requirement for the Operator or other person who has access to personal data to not allow its distribution without the consent of the subject of personal data or the presence of another legal basis.
- 1.1.5. «Site User (hereinafter referred to as the User)» a person who has access to the Site via the Internet and uses the Site.
- 1.1.6. «Cookies» a small piece of data sent by a web server and stored on the user's computer which a web Client or a web browser sends to the web server each time in an HTTP request when an attempt is made to open a page on the corresponding site.
- 1.1.7. «IP address» a unique network address of a node in a computer network built using the IP protocol.

## 2. GENERAL TERMS

- 2.1. The User's usage of the site constitutes agreement with this Privacy Policy and the terms of User's personal data processing.
- 2.2. In case of disagreement with the terms of the Privacy Policy, the User must stop using the site.
- 2.3. This Privacy Policy applies only to the DDA Real Estate website. The site does not control and is not responsible for third party sites that the User can access via links available on the site.

2.4. The Site Administration does not verify the accuracy of the personal data provided by the User.

# 3. PRIVACY POLICY SUBJECT

- 3.1. This Privacy Policy establishes the obligations of the Site Administration to non-disclosure and ensures the protection of confidentiality of personal data that the User provides at the request of the Site Administration when registering on the site or when placing an order to purchase Products.
- 3.2. Personal data permitted for processing under this Privacy Policy is provided by the User by filling out various forms on the DDA Real Estate Website, they include the following information:
- 3.2.1. surname, name, patronymic of the User;
- 3.2.2. phone number of the User;
- 3.2.3. e-mail address;
- 3.2.4. address for the shipping of the Product;
- 3.2.5. location of the User.
- 3.3. The Site automatically collects statistical data that is shared by looking at the advertisements and by visiting web pages:
  - IP-address of the User:
  - cookies information;
  - type of the browser;
  - дата, время и количество посещений; date, time and the number of visits;
  - address of the site from which the User navigated to the Company's website;
  - location data;
  - visited pages and viewed advertisements information;
  - information provided by your browser (type of the device, type and version of your browser, operating system etc.).
- 3.3.1. Disabling cookies may result in the inability to access parts of the Site that require authorization.
- 3.3.2. The site collects statistics about the IP addresses of its visitors. This information is used to identify and solve technical problems and to monitor the legality of financial payments.
- 3.4. Any other personal information not specified above (purchase history, browsers and operating systems used, etc.) is subject to secure storage and non-distribution, except for the cases provided for in paragraphs. 5.2. and 5.3. of this Privacy Policy.
- 4. WHY WE COLLECT PERSONAL DATA OF THE USERS

- 4.1. Personal Data of the User can be used by the Site Administration in order to:
- 4.1.1. Identify authorized User to place an order and (or) conclude a sales-purchase agreement remotely with DDA Real Estate.
- 4.1.2. Provide the User with access to personalized resources of the Site.
- 4.1.3. Establish feedback with the User, including sending notifications, requests regarding the use of the Site, provision of services, processing requests from the User.
- 4.1.4. Determine the location of the User to ensure security and prevent fraud.
- 4.1.5. Confirm the accuracy and completeness of personal data provided by the User.
- 4.1.6. Create an account for making purchases, if the User has agreed to create an account.
- 4.1.7. Notify the Site User about the status of the Order.
- 4.1.8. Process and receive payments, confirm taxes or tax benefits, dispute a payment, determine the User's eligibility for a line of credit.
- 4.1.9. Provide the User with effective Customer and technical support if problems arise during the usage of the Site.
- 4.1.10. Provide the User, with their consent, with product updates, special offers, pricing information, newsletters and other information on behalf of the Site or on behalf of the Site's partners.
- 4.1.11. Carrying out advertising activities with the consent of the User.
- 4.1.12. Providing the User with access to Partner sites or services in order to receive products, updates and services.
- 5. METHODS AND TERMS OF PROCESSING PERSONAL INFORMATION
- 5.1. The processing of the User's personal data is carried out without a time limit, in any legal way, including in personal data information systems using automation tools or without the use of such tools.
- 5.2. The User agrees that the Site Administration has the right to transfer personal data to third parties, in particular, courier services, postal organizations, telecommunication operators solely for the purpose of fulfilling the User's order placed on the DDA Real Estate Website, including delivery of the Products.
- 5.3. The User's personal data may be transferred to authorized government bodies of the Russian Federation only on the grounds and in the manner established by the legislation of the Russian Federation.
- 5.4. In case of loss or disclosure of personal data the Site Administration informs the User about the loss or disclosure of personal data.

- 5.5. The site administration takes the necessary organizational and technical measures to protect the User's personal information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other unlawful actions of third parties.
- 5.6. The Site Administration, together with the User, takes all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the User's personal data.
- 6. OBLIGATIONS OF THE PARTIES
- 6.1. The User is obliged to:
- 6.1.1. Provide information about personal data necessary to use the Site.
- 6.1.2. Update, add the provided information about personal data if this information changes.
- 6.2. The Site Administration is obliged to:
- 6.2.1. Use the information received solely for the purposes specified in clause 4 of this Privacy Policy.
- 6.2.2. Ensure that confidential information is kept secret, not disclosed without the prior written permission of the User and also not sell, exchange, publish, or disclose in other possible ways the transferred personal data of the User, with the exception of paragraphs 5.2. and 5.3. of this Privacy Policy.
- 6.2.3. Take precautions to protect the confidentiality of the User's personal data in accordance with the procedure usually used to protect this type of information in existing business transactions.
- 6.2.4. Block personal data relating to the relevant User from the moment of application or request from the User or his legal representative or the authorized body for the protection of the rights of personal data subjects for the period of verification, in the event of detection of unreliable personal data or unlawful actions.

# 7. LIABILITY OF THE SIDES

- 7.1. If the obligations are not fulfilled by the Site Administration, it is responsible for losses incurred by the User in connection with the unlawful use of personal data, in accordance with the legislation of the Russian Federation, except for the cases provided for in paragraphs 5.2., 5.3. and 7.2. of this Privacy Policy.
- 7.2. In case of loss or disclosure of Confidential Information, the Site Administration is not responsible if this confidential information:
- 7.2.1. Became public before its loss or disclosure.
- 7.2.2. Was received from the third party before the Site Administration received it.

7.2.3. Was disclosed under User's agreement.

# 8. DISPUTE RESOLUTION

- 8.1. Before filing a claim in court regarding disputes arising from the relationship between the User and the Site Administration, it is mandatory to submit a claim (a written proposal for a voluntary settlement of the dispute).
- 8.2 .Within 30 calendar days from the date of receipt of the claim the recipient notifies the claimant of the results of consideration of the claim in writing.
- 8.3. If no agreement is reached, the dispute will be referred to a judicial authority in accordance with the current legislation of the Russian Federation.
- 8.4. The current legislation of the Russian Federation applies to this Privacy Policy and the relationship between the User and the Site Administration.

# 9. ADDITIONAL TERMS

- 9.1. The Site Administration is entitled to edit this Privacy Policy without the consent of the User.
- 9.2. New Privacy Policy enters into force right after its publishing on the Site until different terms are stated within the new Privacy Policy.
- 9.3. Any suggestions or questions regarding this Privacy Policy should be reported via the feedback form.
- 9.4. Valid Privacy Policy is published on the webpage dda-re.com/privacy\_policy/