

# Regulations on commercial secrets and personal data processing

## 1. General terms

1.1. The Policy of the Users' personal data processing on the Web site <https://winance.eu> (hereinafter referred to as the Policy) was developed by the Administration of the Web site "winance.eu", (hereinafter referred to as the Web site) and determines the procedure and conditions of the Web site Users' personal data processing by the Web site Administration.

1.2. The Policy is a legally obligatory agreement between any User of the Web site and the Web site Administration, that regulates the procedure and conditions of the Web site Users' personal data processing by the Web site Administration.

1.3. The terms and conditions set forth by the Web site License Agreement posted at <https://winance.eu/en/site/agreement/> and the Privacy Policy posted at <https://winance.eu/en/site/privacy-policy/> are applied to the present Policy.

1.4. The User is obliged to get full knowledge of the Policy prior to the registration on the Web site. The User's registration on the Web site means the full and unconditional acceptance of this Policy in accordance with Article 438 of the Civil Code of the Russian Federation.

1.5. This Policy may be amended and/or supplemented by the Web site Administration unilaterally without any special notice. The Agreement is an open and public document. The current version of the Policy is located on the Internet at <https://winance.eu/en/site/personal-data/>

1.6. The Web site Administration recommends the Users to check regularly the terms of this Policy for changes and/or additions. The continuation of the Web site use by the User after any changes and/or additions to this Policy have been made is regarded as an acceptance and consent of the User with such changes and/or additions.

## 2. Personal data processing of the User

2.1. The personal data processing of the User is carried out in accordance with Federal Law No. 152-FZ dd. July 27, 2006 "On Personal Data" (hereinafter referred to as the Law).

2.2. The Site Administration processes the User's personal data in order to register and authorize the User on the Web site, conclude and fulfill the License Agreement, as well as fulfill its obligations to the User.

2.3. The registration on the Web site means the User's consent to the processing of his personal data provided during the registration by the Administration. The processing of the User's personal data is carried out in accordance with the Law. The Web site Administration processes the User's personal data in order to:

- provide the User with the financial services including personalized (targeted) advertising received by the User;
- provide the Web site content to enable the User with the Investor status to carry out corresponding activities;
- verify, research and analyze such data allowing to maintain and improve the services and sections of the Web site, as well as develop new services and sections of the Web site;

- settlement of accounts with the User/Investor.

### **3. Protection of the User's personal data**

3.1. The Web site Administration takes all necessary measures to protect the User's personal data from unauthorized access, change, disclosure or deleting.

3.2. The Administration provides access to the User's personal data only to those employees, contractors, agents, and the parent company of the Administration, who need this information to ensure the Web site operation and the Services provision to the User.

3.3. The Web site Administration has the right to use the information provided by the User including personal data in order to ensure compliance with the requirements of the current legislation of the Russian Federation (including in order to prevent and/or stop illegal and/or wrongful actions of the Users).

3.4. The disclosure of the information provided by the User can be made only in accordance with the current legislation of the Russian Federation at the request of the court, law enforcement agencies, as well as in other cases stipulated by the legislation of the Russian Federation.

3.5. Since the Web site Administration has the right to process the User's personal data in order to fulfill the License Agreement, the User's special (written) consent to the processing of his personal data is not required according to the provisions of the legislation on personal data (Law).

3.6. The User is personally responsible for the safe completion of work under his account (use of the "Log out" button). The Web site Administration isn't responsible for any data loss that may occur through the User's violation of the License Agreement, the Privacy Policy, and these Regulations.

3.7. Termination of the registration. The Web site Administration reserves the right to block or delete the User's account, as well as to deny access and delete the posted content without any explanations in case of violation of the terms of the License Agreement. The User can also stop using the Web site by notifying the Web site Administration of the wish to delete the account.

3.8. The Web site Administration processes the personal data of the User, namely, last name, first name, patronymic name, e-mail address, and other data posted by the User on the Web site. The specified data is stored and processed during the entire period of operation of the Web Site.

### **4. Commercial secret**

4.1. The commercial secret is the confidential treatment of information that enables its owner to increase revenues under current or possible circumstances, avoid unnecessary expenses, maintain his position in the market of services, or obtain another commercial benefit.

4.2. Information that constitutes commercial secret comprises information of any character concerning the methods to carry out professional activities and containing real or potential commercial value due to its non-public nature, to which third parties don't have free access on a legal basis and which the owner of such information protects as a commercial secret.

4.3. Information that constitutes commercial secret includes information on the investments size, contracts, income, and all financial transactions.

4.4. The Administration and the User have material and other kinds of responsibility established by the Law in the case of disclosure of any commercial secrets to third parties.

4.5. The disclosure of information that constitutes a commercial secret means any action or omission that lead to a situation, where the information that constitutes a commercial secret in any possible form (oral, written, or other forms including the use of technical tools) becomes known to third parties without the consent of the owner of such information or contrary to the License Agreement.

4.6. Provisions 4.4. and 4.5. don't apply to the actions related to the information disclosure in accordance with the legal requirements of the state authorities, other state bodies, and local authorities on providing them with information constituting a commercial secret.

## **5. Final provisions**

5.1. This Policy is governed by and interpreted in accordance with the laws of the Russian Federation. The issues that aren't regulated by the Rules shall be settled in accordance with the legislation of the Russian Federation.

5.2. In case of any disputes or disagreements related to the execution of this Policy, the User and the Web site Administration will make every effort to resolve them through negotiations. In case if the disputes aren't resolved through negotiations, they shall be settled in accordance with the procedure established by the current legislation of the Russian Federation.

5.3. This Policy enters into force for the User upon his registration on the Web site and is valid for an indefinite period.

5.4. If for one reason or another, one or more provisions of this Policy are declared invalid or unenforceable, this doesn't affect the validity or applicability of the remaining provisions.