Personal data processing agreement for users of the Website unitedtraders.com

Current version as of May 20, 2019

1. General provisions

Under the terms and conditions of this Personal Data Processing Agreement (hereinafter referred to as the Agreement), **UT Exchange OÜ**, an entity registered in compliance with the laws of Estonia, located at Peterburi Tee 47, Harjuma Maakond, Tallinn, Estonia, grants the users of the website located at unitedtraders.com and its subdomains (hereinafter referred to as the Website) the right to use the Website.

Agreement – this document with all additions, changes and mandatory documents specified in it, as well as the agreement made between Operator and User on its basis.

User – an individual who accepts the terms of the Agreement, who has full legal capacity, has his own email address on the Internet, personal computer and/or mobile device, access to which is at his/her disposal.

Onepatop – **UT Exchange OÜ**, independently or jointly with other legal entities that are members of its group of persons, which organizes and (or) performs personal data processing as well as determines the purposes of personal data processing, the composition of personal data subject to processed, actions (operations) performed with personal data, such as collection, recording, systematization, accumulation, storage, clarification (updating, change), extraction, use, transfer (distribution, provision, access), anonymization, blocking, removal, etc. Processing of Personal Data may be performed by the Operator both using automated and non-automated methods.

Personal data - any information that User provides about himself or herself when registering on the Website as well as during further use of the Website.

Account (Personal profile) – a personal section of the Website, User accesses after registration and/or authorization on the Website. The Account is designed for storing User's personal data for the purpose of convenience of further use of the Website, viewing and management of available functionality of the Website and the Website's terms of use.

1. The Conditions of Personal Data collection and storage

Upon authorization, Operator notifies User about the conditions of personal data collection and storage by displaying an announcement with text and hyperlink:

"By pressing the "Continue" button, you confirm your acceptance of the offer."

Upon Account registration, User independently, freely, of his/her own volition and in his/her interests gives Operator an indefinite written consent to any methods of processing his/her personal data.

User must read the terms of use of his personal data before their processing.

User at any moment has the right to withdraw the consent to his/ her Peronsal Data processing by sending a request to Operator to block his/her Account at welcome@unitedtraders.com.

Operator shall stop processing Personal Data and destroy them within a period not exceeding 30 calendar days from the date of receipt of such application, except for the data required for storage in accordance with the current legislation of the Russian Federation. In this case Operator stores only the anonymized personal data of User in his database systems.

Operator is not responsible for the completeness and applicability of the information about Users. User has the right to independently edit Personal data he/she provided upon registration or authorization in his/her Account at any moment.

2. Objectives of the Agreement

The purposes of the Agreement include:

- _ registration of User's Account on Website (Consent to the User's agreement to use the Website)
- _ fulfillment of obligations under the concluded agreements by providing User with access to Website and its features, since User is a party or beneficiary or a guarantor under such agreement;
- participation in research and marketing activities performed by Operator;
- sending advertising messages to User and receiving advertising information via telecommunication networks (including through mobile communication and email);
- carrying out statistical and analytical internal researches of Website use;

Operator can collect and store the following data received from User:

- _ name, surname, gender, passport number, date of birth;
- payment information, including but not limited to: bank card number and expiration date, bank account details for payment transfer;
- email address;
- IP address, cookies, parameters and settings of Internet browsers;
- statistics on User's use of the functions of the service, as well as other technical information.

Operator may use the cross-border transfer of personal data to the territory of a foreign country to a foreign legal entity in order to execute the contract with User. Upon accomplishment of all the set goals, Operator can guarantee User the destruction of his/her Personal data on the territory of the foreign state.

3. Security

Operator stores Personal Data and ensures their protection from unauthorized access and distribution in accordance with the internal rules and regulations. The confidentiality of User's Personal Data is maintained, except for the cases when the technology of Website or the settings of the software used by User provides for the open information exchange with other Users of Website or with any Internet users.

Operator is entitled to transfer Personal Data to third parties in the following cases:

- User directly expressed his consent to such actions
- _ In connection with the transfer of Website into possession, use or ownership of such third party, including the assignment of rights under agreements made with User in favor of such third party
- At the request of the court or other authorized state body within the procedure established by law
- To protect the rights and legal interests of Operator in connection with a breach of agreements made with User

4. Final provisions

The Agreement shall be governed by and interpreted in accordance with the laws of the Russian Federation and shall be effective for all Users. All issues that are not settled by the Agreement shall be resolved in accordance with the laws of the Russian Federation. The current version of the Agreement was developed by Operator on the basis of the Federal law as of July 27, 2006 N 152-FZ "On Personal Data" (with changes and additions as of December 31, 2017).

Operator has the right to process personal data without notifying the authority responsible for protection of the rights of personal data subjects on the basis of the paragraphs 2, item 2, article 22 of the Federal law as of July 27, 2006 N 152-FZ "On personal data".

The Agreement can be unilaterally changed by Operator without prior notification of User. The new version of the Agreement comes into effect as of the moment of its posting on the website https://www.unitedtraders.com/privacy

When making changes to the current version, the date of the recent update is specified.