

## Private Policy

### 1. General Provisions

This policy is developed in accordance with the requirements of the Federal Law No.152-FZ "About Personal Data" and defines the process of data processing and ways (take measure)s of protection of personal data that are applied by LLC Oil Services Alliance (hereinafter – Operator).

- 1.1. **Operator sets as priority and condition of business activity the observance of human rights** and freedom when processing personal data, including privacy immunity, personal and family privacy.
- 1.2. This Operator's Policy regarding personal data processing (hereinafter – Policy) applies to all information that Operator can receive about visitors of web – site <http://osa-oil.com/>.

### 2. Definitions

- 2.1. Automated processing of personal data – processing of personal data using computer technology;
- 2.2. Blocking of personal data – a short term termination of personal data processing (except for the cases when processing is necessary for clarification of personal data).
- 2.3. Web-site – complex of graphic and information materials, and also computer programs and data bases, ensuring availability on the Internet at network address <http://osa-oil.com/>;
- 2.4. Information system of personal data – complex of personal data contained in data bases, and information technologies and tools ensuring its processing;
- 2.5. Depersonalization of personal data – actions taken after which it becomes impossible to define without using additional information whether personal data belong to specific User or other subject of personal data;
- 2.6. Processing of personal data – any action (operation) or complex of actions (operations) performed with personal data using automated tools or without using such tools, including, collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;
- 2.7. The Operator – governmental agency, municipal body, legal entity or individual, independently or together with other persons organizing and (or) carrying out processing of personal data, also determining purposes of personal data processing, the content of personal data to be processed, actions (operations) performed with personal data;
- 2.8. Personal data – any information relating directly or indirectly to a specific or identifiable User of the website <http://osa-oil.com/>;
- 2.9. User – any visitor of the website <http://osa-oil.com/>;
- 2.10. Provision of personal data – actions aimed at disclosing personal data to a certain person or certain group of persons;
- 2.11. Distribution of personal data – any actions aimed at disclosing personal data to general public (transfer of personal data) or for examination of personal data to general public, including disclosure of personal data in the media, posting on information and telecommunication networks or providing access to personal data in any other way;
- 2.12. Cross-border transfer of personal data – transfer of personal data to the territory of foreign state to the governmental authority of foreign state, to a foreign individual or foreign legal entity;

- 2.13. Destruction of personal data – any actions as a result of which personal data are destroyed irrevocably without possibility of further recovery of the content of personal data in the information system of personal data and (or) material objects are destroyed.

### **3. The Operator can process the following personal data of the User:**

- 3.1. Name, Surname
- 3.2. E-mail address
- 3.3. Telephone numbers
- 3.4. The site also collects and processes depersonalized data about the visitors (including “cookies”) with the help of web-statistics services (Yandex Metrica and Google Analytics and others).
- 3.5. The abovementioned data hereinafter in the text of Policy are united by the general concept of Personal data.

### **4. Purposes of personal data processing**

- 4.1. The purpose of personal data processing of the User – informing of the User by sending emails; providing the User with access of to the services, information and/or materials, contained on website; clarification of order details.
- 4.2. The operator also has the right to send to the User notifications about new products and services, special offers and other events. The User can any time refuse to receive information messages by sending an email to the Operator at [info@osa-oil.com](mailto:info@osa-oil.com) with the note “Refusal of notifications about new products and services and special offers”.
- 4.3. Depersonalized Users’ data collected using Internet statistics services are used to collect information about the actions of Users on the website and improve the quality of the website and its content.

### **5. Legal ground for processing of personal data**

- 5.1. The Operator processes the User's personal data only if it is filled in and / or sent by the User himself / herself through special forms located on the website <http://osa-oil.com/>. By filling out the appropriate forms and / or sending User’s personal data to the Operator, the User agrees with this Policy.
- 5.2. The Operator processes depersonalized data about the User if it is allowed in the settings of the User's browser (the storage of cookies and the use of JavaScript technology are enabled).

### **6. The order of collecting, storing, transferring and other types of processing of personal data**

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 the 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 the current legislation.
- 6.3. In case of inaccuracies in personal data, the User can update them himself / herself by sending a notification to the Operator to the Operator's e-mail address [info@osa-oil.com](mailto:info@osa-oil.com) with subject "Updating personal data".

6.4. The period for processing personal data is unlimited. The User can at any time revoke his consent to the processing of personal data by sending a notification to the Operator via e-mail to the Operator's email address [info@osa-oil.com](mailto:info@osa-oil.com) with the subject "Revocation of consent to the processing of personal data".

## **7. Cross-border transfer of personal data**

- 7.1. Before starting the cross-border transfer of personal data, the Operator is obliged to make sure that the foreign state, to whose territory it is supposed to transfer personal data, provides reliable protection of the rights of subjects of personal data.
- 7.2. Cross-border transfer of personal data on the territory of foreign states that do not meet the above mentioned requirements can be carried out only if the subject of personal data agrees in writing to the cross-border transfer of his/her personal data and / or the execution of an agreement to which the subject of personal data is a party.

## **8. Final Provision**

- 8.1. The User can receive any clarifications regarding the processing of personal data by contacting the Operator via e-mail [info@osa-oil.com](mailto:info@osa-oil.com)
- 8.2. This document will reflect any changes in the personal data processing Policy of the Operator. The Policy is valid for unlimited period until it is replaced by a new version.
- 8.3. The current version of the Policy is available on page at [http://osa-oil.com/privacy/personal\\_data\\_processing\\_policy.pdf](http://osa-oil.com/privacy/personal_data_processing_policy.pdf).