



Privacy Policy for Personal Data and the Use of Cookies

This Privacy Policy for Personal Data (hereinafter referred to as the “Privacy Policy”) has been developed in order to comply with the current legislation of the Russian Federation and to implement the requirements of Federal Law No. 152-FZ dated July 27, 2006 “On Personal Data”.

This Privacy Policy applies to all information that We Fry LLC (hereinafter referred to as the “Company”, “Operator”) may obtain about visitors to the website located at the domain names <https://wefry.ru/> and <https://wefry.pro>, the WE FRY PRO Telegram bot available at <https://t.me/WeFryProBot>, and the WE FRY PRO Telegram channel available at <https://t.me/wefrypro>.

1. Terms and Definitions.

1.1. The following terms shall be used in this Privacy Policy:

1.1.1. **Operator** – an organization that arranges the processing of personal data, as well as determines the purposes of processing personal data subject to processing, and the actions (operations) performed with personal data. The Operator is We Fry LLC (INN/TIN: 4802024211, OGRN: 1124802000817. Legal address: 398010, Russia, Lipetsk Region, Gryazinsky Municipal District, Gryazi, territory of SEZ PPT Lipetsk, building 67).

1.1.2. **Personal Data** – any information relating directly or indirectly to a specific or identifiable natural person (data subject).

1.1.3. **Processing of Personal Data** – any action (operation) or set of actions (operations) performed with or without the use of automation means with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), retrieval, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction of personal data.

1.1.4. **Confidentiality of Personal Data** – a requirement binding on the Operator or any other person who gains access to personal data not to allow their dissemination without the consent of the personal data subject or without another lawful basis.

1.1.5. **Website** – a collection of texts, graphic elements, design, images, software code, photo and video materials, and other results of intellectual activity contained on the Internet under the domain names <https://wefry.ru/> and <https://wefry.pro>.

1.1.6. **User** – any visitor to the Website, as well as individuals using the Telegram bot.

1.1.7. **Cross-border transfer of Personal Data** – the transfer of Personal Data to the territory of a foreign state to a foreign government authority, a foreign individual, or a foreign legal entity.

1.1.8. **Cookies** – text files in which the browser records data about visited websites. The data is generated by the web server and stored on the User's device. Cookies contain the website name, storage duration in the browser, and unique identifying information.

1.1.9. **Telegram bot** – WE FRY PRO Telegram bot, accessible at <https://t.me/WeFryProBot>, of the WE FRY PRO Telegram channel, accessible at <https://t.me/wefrypro>.

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1.1.10. **IP address** – a unique network address of a node in a computer network through which the User gains access to the Website.

2. General Provisions.

2.1. The User's use of the Website and the Telegram bot constitutes acceptance of this Privacy Policy and the terms of processing the User's Personal Data.

2.2. If the User disagrees with the terms of the Privacy Policy, the User must cease using the Website and the Telegram bot.

2.3. This Privacy Policy applies to the Website and the Telegram bot. The Operator does not control and is not responsible for third-party websites that the User may access via links available on the Website and the Telegram bot.

2.4. The Operator does not verify the accuracy of the Personal Data provided by the User. At the same time, the Operator assumes that the User provides accurate and sufficient Personal Data and keeps it up to date.

2.5. The User confirms that by providing their Personal Data and giving consent to its processing, he/she is acting voluntarily, of his/her own free will, and in his/her own interest, and also confirms his/her legal capacity.

3. Subject of the Privacy Policy.

3.1. This Privacy Policy establishes the Operator's obligations regarding the non-disclosure and protection of the confidentiality of Personal Data that the User provides to the Operator when filling out special forms on the Website or in the Telegram bot.

3.2. Personal Data permitted for processing under this Privacy Policy includes the following information about the User:

- last name, first name, patronymic;
- contact phone number;
- email address;
- place of work and position held;
- field of activity;
- region;
- User location;
- data collected via the Telegram bot: unique Telegram user identifier (User ID); username; profile name; data on interaction with the Telegram bot; content of messages sent via the Telegram bot; time and date of access to the Telegram bot.

3.3. Data that is automatically transmitted to the Website's services during their use via software installed on the User's device, including IP address, cookie information, information about the User's browser (or other program used to access the website), access time, and the address of the requested page, is not considered Personal Data for the purposes of this Privacy Policy and Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data". The IP address, domain name, browser type and operating system, date and time of visit are collected and stored by the Operator in a depersonalized form for visitor statistics purposes.

3.4. Some Personal Data is provided automatically due to the use of the Telegram messenger. The use of such Personal Data is necessary solely for the operation of the Telegram bot within

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the Telegram messenger and is not an independent purpose of Personal Data processing. The rights and obligations of the Operator and the User in this case are determined in accordance with the Privacy Policy of the Telegram messenger, available at: <https://telegram.org/privacy>. The Operator in this case is an independent legal entity, Telegram Messenger, Inc. The Company is not responsible for the processing of the User's Personal Data automatically provided to Telegram Messenger, Inc.

4. Purposes and methods of processing Personal Data.

- 4.1. The Operator may use the User's Personal Data for the following purposes:
- 4.1.1. Identification of the User when using the Website and the Telegram bot.
 - 4.1.2. Provision of access to the functionality of the Website and the Telegram bot.
 - 4.1.3. Provision of the operation of the Website and the Telegram bot.
 - 4.1.4. Maintenance of usage statistics of the Website and the Telegram bot.
 - 4.1.5. Provision of technical support via the Telegram bot.
 - 4.1.6. Notifications to the User on the Company's news, new products and services, special offers, and various events for informational and advertising purposes.
 - 4.1.7. Conduction of analytical, statistical, and other types of research.
 - 4.1.8. Depersonalized User data collected using internet statistics services (Yandex.Metrica) is used to gather information about User actions on the Website, and to improve the quality of the Website and its content.
- 4.2. For the purpose of fulfilling the Operator's obligations, the User's consent to the processing of Personal Data and the consent with this Privacy Policy shall mean the User performing actions that unambiguously demonstrate their expression of will, including, but not limited to, clicking the "Subscribe" button, "Submit" button, and/or checking a corresponding checkbox confirming consent to the processing of Personal Data, as well as sending Personal Data via the Telegram bot.
- 4.3. The Operator's processing of the User's Personal Data is carried out by all lawful means, including collection, recording, systematization, accumulation, storage, updating (refreshing, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, and destruction of Personal Data, using automation tools and without the use of automation tools.

5. Procedure for processing Personal Data.

- 5.1. The Operator undertakes to use Personal Data in accordance with Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data" and the Operator's internal documents.
- 5.2. The confidentiality of Personal Data is maintained, except in cases where such data is publicly available.
- 5.3. The Operator has the right, in compliance with legal requirements, to transfer the User's Personal Data to third parties in the following cases:
- 5.3.1. The User has expressed consent to such actions.
 - 5.3.2. The transfer is necessary for the User to use a specific service of the Website or the Telegram bot, or to perform a specific agreement with the User.
 - 5.3.3. The transfer is provided for by law within the framework of the procedure established by legislation.

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5.3.4. In the event that the Operator's rights and obligations are transferred to another person, all obligations to comply with the terms of this Privacy Policy with respect to the Personal Data received by the Operator shall also be transferred to that person.

5.3.5. The Operator has the right to entrust the processing of Users' Personal Data to third parties that provide analytics and optimization services related to the Website (Yandex.Metrica); provide Website hosting services and support for the information systems used (Yandex LLC, 119021, Moscow, Lev Tolstoy Street, 16); carry out email newsletters using the Unisender service (UNISENDER SMART LLC, 127015, Moscow, Butyrsky Municipal District, Bolshaya Novodmitrovskaya Street, premises 2/46); and assist in organizing the Company's marketing and advertising activities. Persons processing personal data on behalf of the Operator undertake to comply with the principles and rules for the processing and protection of Personal Data provided for by Federal Law No. 152-FZ of July 27, 2006 "On Personal Data" and by this Privacy Policy.

5.4. Processing of the User's personal data continues until the User withdraws its consent to the processing of Personal Data. The User may withdraw their consent to the processing of Personal Data at any time by sending a written notice to the Operator at the following address: 398010, Russia, Lipetsk Region, Gryazinsky Municipal District, Gryazi, territory of SEZ PPT Lipetsk, building 67, or via email at info@wefry.ru, with the note "Withdrawal of consent to the processing of personal data".

5.5. In the event of loss or disclosure of Personal Data, the Operator shall notify the User of such loss or disclosure. The Operator, together with the User, shall take all necessary measures to prevent losses or other adverse consequences resulting from the loss or disclosure of the User's Personal Data.

5.6. The processing of personal data is carried out with the User's consent. The text of the consent to the processing of personal data is provided in accordance with Appendix No. 1 to this Privacy Policy.

6. Protection of Personal Data.

6.1. The Operator provides appropriate protection of Personal Data in accordance with the legislation of the Russian Federation and takes necessary and sufficient organizational and technical measures to protect Personal Data.

6.2. The specific list of measures taken by the Operator to ensure the security of Personal Data is determined by the Operator independently and includes, in particular: the development by the Operator of local documents implementing the requirements of Russian legislation, including this Privacy Policy, and posting it on the Website (as well as posting a link to the Privacy Policy in the Telegram bot); the appointment of a person responsible for the processing and protection of Personal Data; the development of necessary internal documentation regulating the processing and protection of Personal Data; restricting the number of the Operator's employees who have access to Personal Data; conducting internal control; and other measures that comply with the requirements imposed by the current legislation of the Russian Federation on the protection of Personal Data.

6.3. The applied security measures also protect Personal Data from unlawful or accidental access, destruction, alteration, blocking, copying, distribution, as well as from other unlawful actions by third parties.

6.4. The Operator processes the User's Personal Data using databases located on the territory of the Russian Federation. The Operator does not carry out cross-border transfer of Personal Data.

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7. Processing of Cookies.

7.1. The Company processes cookies collected during the User's use of the Website. By continuing to use the Website after the appearance of a banner notice regarding the use of cookies and/or by clicking the «OK» button on the banner notice regarding the use of cookies, the Users give their consent to the processing of cookies and agree to the terms of this Privacy Policy.

7.2. The Operator does not use cookies to identify the User. Furthermore, the Operator does not use cookies for the purpose of conducting newsletters or other promotional activities using web technologies.

7.3. The Company collects cookies for the following purposes:

7.3.1. Ensuring the uninterrupted operation of the Website.

7.3.2. Ensuring the safe use of the Website by Users.

7.3.3. Generating objective statistics using specialized tools (Yandex.Metrica), which allow for assessing the functionality of the Website and evaluating parameters reflecting its traffic.

7.4. Cookies used by the Website can be divided into the following categories:

7.4.1. Session Cookies – are temporary cookies that exist in the temporary memory of the User's device while the User is using the Website. Devices typically delete session cookies after the User closes the browser.

7.4.2. Persistent Cookies – are cookies that are used to remember the User's preferences when using the Website and remain on the User's device even after the browser is closed or the User's device is restarted, until their “expiration date” or until they are deleted by the User.

7.5. Cookies are stored indefinitely, not just during a session. The User may change cookie settings, delete, or reject all cookies at any time. To do this, the User must activate the setting in their browser that allows to reject cookies. However, this may result in the inability to access certain features of the Website.

8. Liability of the Parties.

8.1. The Operator shall be liable for the intentional disclosure of the User's Personal Data in accordance with the applicable legislation of the Russian Federation, except for the cases provided for in this Privacy Policy.

8.2. In the event of loss or disclosure of Personal Data, the Operator shall not be liable if such data:

8.2.1. became publicly available prior to its loss or disclosure;

8.2.2. was obtained from a third party before it was received by the Operator;

8.2.3. was disclosed with the User's consent;

8.2.4. was obtained by third parties through unauthorized access to the Website or the Telegram bot.

9. Dispute Resolution.

9.1. Before filing a lawsuit regarding disputes arising from relations between the User and the Operator, filing a claim (a written proposal or an electronic proposal for voluntary dispute settlement) is mandatory.

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9.2. The recipient of the claim shall, within 30 calendar days from the date of receiving the claim, notify the claimant in writing or electronically of the results of its consideration.

9.3. If an agreement is not reached, the dispute shall be referred to a court for consideration in accordance with the current legislation of the Russian Federation.

9.4. The current legislation of the Russian Federation shall apply to this Privacy Policy and to the relations between the User and the Operator.

10. Final Provisions.

10.1. The Operator has the right to make changes to this Privacy Policy without the User's consent. Such changes take effect from the moment they are posted on the Website and apply to all Users.

10.2. Any suggestions or questions regarding this Privacy Policy shall be sent to the following email address: info@wefry.ru.

10.3. The current Privacy Policy is posted at <https://wefry.ru/> and <https://wefry.pro>.

10.4. The User's consent to the processing of Personal Data is an integral part of this Privacy Policy (Appendix No. 1).

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Appendix No. 1
to the Privacy Policy for Personal Data and the Use of Cookies

CONSENT
to the processing of Personal Data

I hereby, in accordance with Federal Law No. 152-FZ dated July 27, 2006 “On Personal Data” give my consent to the Limited Liability Company We Fry (INN/TIN: 4802024211, OGRN: 1124802000817, Legal address: 398010, Russia, Lipetsk Region, Gryazinsky Municipal District, Gryazi, territory of SEZ PPT Lipetsk, building 67 (hereinafter referred to as the Company, the Operator),

to the processing of my personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), retrieval, transfer (distribution, provision, access), use, anonymization, blocking, erasure (destruction), i.e., to the performance of all actions provided for in paragraph 3 of Article 3 of Federal Law No. 152-FZ dated July 27, 2006 “On Personal Data,” including both with and without the use of automation tools,

for the following purposes:

- Identifying me as a User when using the website located at the domain names <https://wefry.ru/> and <https://wefry.pro> (hereinafter – the Website), as well as the WE FRY PRO Telegram bot available at <https://t.me/WeFryProBot>, and the WE FRY PRO Telegram channel available at <https://t.me/wefrypro> (hereinafter – the Telegram bot);
- Providing access to the functionality of the Website and the Telegram bot;
- Ensuring the operation of the Website and the Telegram bot;
- Maintaining usage statistics of the Website and the Telegram bot;
- Providing technical support via the Telegram bot;
- Sending me notifications about the Company's news, new products and services, special offers, and various events for informational and advertising purposes;
- Conducting analytical, statistical, and other types of research;
- Anonymized data of Website Users collected using internet statistics services (Yandex.Metrica) is used to gather information about User actions on the Website, to improve the quality of the Website and its content.

List of personal data for which I give my consent to process:

- last name, first name, patronymic;
- contact phone number;
- email address;
- place of work and position held;
- field of activity;
- region;
- User location;

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– data collected via the Telegram bot: unique Telegram user identifier (User ID); username; profile name; data on interaction with the Telegram bot; content of messages sent via the Telegram bot; time and date of access to the Telegram bot.

In addition to the Operator, I allow access to my personal data to the following parties: those who provide analytics and optimization services related to the Website (Yandex.Metrica); those who provide website hosting services and support for the information systems used (Yandex LLC, 119021, Moscow, Lev Tolstoy Street, 16); those who conduct email newsletters using the Unisender service (Unisender Smart LLC, 127015, Moscow, Butyrsky Municipal District, Bolshaya Novodmitrovskaya Street, premises 2/46); and those who assist in organizing the Company's marketing and advertising activities (solely to the extent necessary for providing such support).

This Consent has legal force, is considered completed, and is deemed signed from the moment I fill out the feedback form by accepting the terms and checking the graphical consent element, which serves as a substitute for a handwritten signature.

This Consent to the processing (transfer) of Personal Data is valid from the date of my provision of my Personal Data to the Operator until the date of its withdrawal, which is sent by me to the Operator at the following address: 398010, Russia, Lipetsk Region, Gryazinsky Municipal District, Gryazi, territory of SEZ PPT Lipetsk, building 67, or by email at info@wefry.ru, with the note "Withdrawal of consent to the processing of Personal Data".

I have fully read the text of this Consent and agree to its terms.

Detailed terms and conditions of Personal Data processing are set out in the Privacy Policy for Personal Data and the Cookies Policy, posted on the websites <https://wefry.ru/> and <https://wefry.pro>.

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