# Personal Data Processing Policy

1 September 2025

Limited Liability Company «ОРИМИ» (INN 4703044256, registered address: 15/4, 1st Microdistrict, Imeni Sverdlova urban-type settlement, Vsevolozhsky District, Leningrad Region, 188682; hereinafter – ООО «ОРИМИ»)

This Personal Data Processing Policy (hereinafter – the Policy) is intended to inform users (visitors) of the website www.jardincoffee.com, including its subdomains and pages (hereinafter – the Website), by ООО «ОРИМИ» about the procedure and conditions for processing the personal data necessary to achieve the stated purposes of processing.

## Terms Used in the Policy

Personal data – any information relating to a directly or indirectly identified or identifiable natural person (personal data subject);

Personal data operator (operator) – a state body, municipal body, legal entity or natural person that, independently or jointly with other persons, organizes and (or) carries out the processing of personal data and determines the purposes of processing personal data, the composition of personal data to be processed, and the actions (operations) performed with personal data (in this Policy – ООО «ОРИМИ»);

Personal data subject – a natural person whose personal data are processed (in this Policy – a user (visitor) of the Website);

Processing of personal data – any action (operation) or set of actions (operations) performed with personal data, with or without the use of automation tools. Processing of personal data may include, among other things: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion, destruction;

Destruction of personal data – actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which the tangible media of personal data are destroyed;

Personal data information system – a set of personal data contained in databases, together with the information technologies and technical means that ensure their processing.

## Principles of Personal Data Processing

ООО «ОРИМИ» processes personal data in accordance with the following principles:

- personal data are processed on a lawful and fair basis;
- processing of personal data is limited to the achievement of specific, predetermined and lawful purposes;
- processing of personal data incompatible with the purposes of their collection is not permitted;
- combining databases containing personal data processed for mutually incompatible purposes is not permitted;

- only personal data that meet the purposes of their processing are subject to processing;
- the content and scope of the personal data processed correspond to the stated purposes of processing; the personal data processed are not excessive in relation to the stated purposes of their processing;
- when personal data are processed, their accuracy, sufficiency and relevance in relation to the purposes of processing are ensured;
- personal data are stored in a form that allows the personal data subject to be identified for no longer than the purposes of processing require;
- the personal data processed are subject to destruction or depersonalization once the purposes of processing have been achieved or the need to achieve these purposes has ceased, unless otherwise provided by federal law.

**Purposes of Processing Personal Information**

Personal data are processed on the Website for the following purposes:

1. Personalization of services and making the Website more convenient to use.

This purpose involves the processing of cookies; information about the user's actions on the website and about the devices used for them; the date and time of the session, including through the use of web analytics programs.

Cookies are small files that are stored on a device (computer, tablet, smartphone, etc.) and contain information about the user's activity on the Internet.

Data collected using cookies do not belong to the special categories of personal data or biometric personal data within the meaning of Articles 10–11 of Federal Law No. 152-FZ "On Personal Data" of 27 July 2006 and are processed by automated means.

Actions performed with personal data: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (provision, access), blocking, deletion, destruction.

By using cookies, OOO «ОРИМИ» does not seek to identify any specific user of the Website.

The legal basis for processing personal data for this purpose is the consent to the processing of personal data given by the website visitor through implied actions – continuing to use the website. The website user is informed that they can prohibit the processing of cookies by changing the relevant browser settings.

To achieve this purpose of processing personal data, OOO «ОРИМИ» uses web analytics services (web analytics programs) and transfers personal data to third parties – service providers:

- OOO «Яндекс» (INN 7736207543, registered address: 16 Lva Tolstogo St., Moscow, 119021);
- OOO «Адривер» (INN 7813378916, registered address: 83 Savushkina St., bldg. 3, letter A, Saint Petersburg, 197374).

2. Information interaction and communications related to providing information about the products of OOO «ОРИМИ».

This purpose involves the processing by ООО «ОРИМИ» of personal data provided by a Website user by filling in the relevant form and subsequently submitting the request.

To achieve this purpose, the following personal data are processed: full name, email address, telephone number.

Actions performed with personal data: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (provision, access), blocking, deletion, destruction.

The personal data processed for this purpose do not belong to the special categories of personal data or biometric personal data within the meaning of Articles 10–11 of Federal Law No. 152-FZ “On Personal Data” of 27 July 2006 and are processed by mixed means (both with and without the use of automation tools).

The legal basis for processing personal data for this purpose is consent to the processing of personal data.

Personal data are processed from the moment consent to the processing of personal data is obtained until the user declines information interaction and communications related to providing information about the products of ООО «ОРИМИ», or until the consent to the processing of personal data is withdrawn, whichever occurs first. Personal data are destroyed within 30 days after the conditions specified in this paragraph occur, provided that there are no other grounds for continued processing set out in clauses 2–11 of Part 1 of Article 6 of Federal Law No. 152-FZ “On Personal Data” of 27 July 2006.

Third parties to which ООО «ОРИМИ» transfers data to achieve this purpose:

- Joint-Stock Company «Региональный Сетевой Информационный Центр» (INN 7733573894, OGRN 1067746823099, registered address: 72 Leningradsky Prospekt, bldg. 3, Moscow, 125315).
- Limited Liability Company «Дисконто» (INN 7734348475, OGRN 1157746156655, registered address: 57 Dubininskaya St., bldg. 2, premises 11, Danilovsky District, Moscow, 115054).

**Rights of the Personal Data Subject**

In accordance with Federal Law No. 152-FZ “On Personal Data” of 27 July 2006, a website user whose data are processed by ООО «ОРИМИ» has the right to:

- access their personal data;
- have their personal data clarified;
- have their personal data blocked and deleted;
- appeal against actions or omissions of ООО «ОРИМИ»;
- withdraw their consent to the processing of personal data.

ООО «ОРИМИ» does not make decisions based solely on automated processing of personal data that give rise to legal consequences for the personal data subject or otherwise affect their rights and legitimate interests.

These rights may be exercised by sending a request to the registered address of ООО «ОРИМИ» stating the details of the identity document of the subject or their representative (document type, series and number, issuing authority and date of issue),

the full name of the subject or their representative, information about the relationship with ООО «ОРИМИ» confirming that ООО «ОРИМИ» processes the personal data, and the signature of the subject or their representative. The request may also be sent to the email address opd@orimitrade.ru in the form of an electronic document signed in accordance with the legislation of the Russian Federation on electronic signatures.

Actions (or omissions) of ООО «ОРИМИ» as a personal data operator may be appealed to the territorial body of Roskomnadzor or to a court in accordance with the procedure established by the legislation of the Russian Federation.

**Information on the Measures Taken to Ensure the Security of Personal Data**

When processing personal data, ООО «ОРИМИ» takes, or ensures that others take, the necessary legal, organizational and technical measures to protect personal data against unlawful or accidental access, destruction, modification, blocking, copying, provision and dissemination, as well as against other unlawful actions in relation to them.

Personal data processed by ООО «ОРИМИ» are considered confidential information and are protected against loss, modification or unauthorized access in accordance with the requirements of the legislation of the Russian Federation in the field of personal data.

The security of personal data is ensured, in particular, by:

- identifying threats to the security of personal data during their processing in personal data information systems;
- applying the organizational and technical measures to ensure the security of personal data during their processing in personal data information systems that are necessary to meet the personal data protection requirements, compliance with which ensures the levels of personal data protection established by the Government of the Russian Federation;
- using information security tools that have passed the conformity assessment procedure in the established manner, where the use of such tools is necessary to neutralize current threats;
- assessing the effectiveness of the measures taken to ensure the security of personal data before the personal data information system is put into operation;
- detecting incidents of unauthorized access to personal data and taking measures;
- restoring personal data modified or destroyed as a result of unauthorized access to them;
- establishing rules for access to personal data processed in the personal data information system, and ensuring that all actions performed with personal data in the personal data information system are registered and recorded;
- monitoring the measures taken to ensure the protection of personal data and the level of security of personal data information systems.

**Changes to the Policy**

ООО «ОРИМИ» reserves the right to update the Policy periodically without separate notice. The date of the latest update is indicated on the first page of the Policy

(below the title). Website users are advised to review updates to the Policy in order to keep track of possible changes.

The Policy is subject to review and update in the event of changes to the legislation of the Russian Federation in the field of personal data, and based on the results of an analysis of the relevance, sufficiency and effectiveness of the measures applied by ООО «ОРИМИ» to ensure the security of personal data.

**Additional Information**

The Policy applies only to the Website of ООО «ОРИМИ» and does not extend to other websites of service providers to which links may be placed on the Website of ООО «ОРИМИ».

The Website of ООО «ОРИМИ» is not intended for processing personal data of minors. If there are grounds to believe that a minor has provided their personal data through the website, please send a relevant notice to the email address *opd@orimitrade.ru*

**Contact Details**

The contacts specified in this section are used for communication on matters of personal data processing and protection:

Email address: *opd@orimitrade.ru*