



HERZEN INTERNATIONAL CORPORATION (IO3468)

Privacy Policy For Herzen International

Version 1.0 (as at 7th January 2022)

1. Introduction

Herzen International Corporation or our proprietor (“**Herzen International**”) we take your privacy and the security of your information very seriously.

This Privacy Policy (“**Policy**”) covers the website – [<https://www.herzen-int.com/>] designed by the Company (“**the Site**”)

This Privacy Policy governs your use of any of the services, functions or features provided by the Company. Unless otherwise defined herein, capitalized terms shall have the meaning assigned to such terms in the Terms of Use.

The Policy describes the types of information we gather from all User and Registered Member of the Site (“**you**” or “**your**”) interacting with the Site, and how we use, transfer, and secure such information. By using any of the services, functions or features provided by Herzen International, either itself or through its affiliates, via the Site, you agree to be bound by this Policy. This Policy does not given information we receive from third parties who are neither our User or Registered Member. If you do not agree to the terms of this Policy, you are not authorized to use the Site. Each time you use the Site, the current version of this Policy will apply. Accordingly, you should check the date of this Policy (which appears at the top) and review any changes of the Policy from time to time.

2. Terms

For the purposes of this Privacy Policy, the terms have the following meaning;

- a. ‘Consent’ of the data subject means any freely given, specific, informed and unambiguous indication of the data subject’s wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her;
- b. ‘Personal Data’ means any information relating to an identified or identifiable natural person (“**data subject**”); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;
- c. ‘Personal Data Breach’ means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to, personal data transmitted, stored or otherwise processed;
- d. ‘Processing’ means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.



HERZEN INTERNATIONAL CORPORATION (IO3468)

3. Types Of Data We Collect

We may collect two types of data from you or via third parties maybe used by us, or shared with or transferred to third parties (including related companies, third party seller, and companies located both inside and outside your home country): example of personal data included but not limited to:

- a. Identity data, such as your name, gender, profile picture, and date of birth;
- b. Contact data, such as billing address, delivery address, email address and phone numbers;
- c. Account data, such as bank account and payment details;
- d. Transaction data, such as details about payments to and from you, and other details of products and services you have purchased from us;
- e. Technical data, such as internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and Site, and other technology on the devices you use to access the Site;
- f. Profile data, such as your username and password, purchases or orders made by you, your interests, preferences, feedback and survey responses;
- g. Usage data, such as information on how you use the Site, products and Services or view any content on the Site;
- h. Marketing and communication data, such as your preferences in receiving marketing from us and our third parties and your communicate.

“Data provided by you” which is information used in order to create an account and “Additional data we receive about you” which is data that is generated from using our Site, which data we store and process.

- **Data provided by you:**

We collect data you voluntarily provide to us in order to register an account at the Site. In general, you provide us with your name and email address in order to create an account and provide you with the necessary access. Your email is used for account recovery purpose as well as for contacting support. Your username is your phone number.

- **Additional data we receive about you:**

Additional data may be collected when you use the Site independent of any information you voluntarily enter.

- **Log information:**

When you use or access the Site, some data is automatically collected. Such data could include your computer's Internet Protocol (“IP”) address (a number that provides an address for your computer), operating system, type and language, device identifier numbers, and the time and date of your use.

- **Analytics information:**

We use our own internal and third-party solutions to gather and aggregate analytical data in order to improve the performance, marketing efforts and quality of our products and/or services.



HERZEN INTERNATIONAL CORPORATION (IO3468)

4. Cookies

Our website may use a feature known as cookies which is a small data file stored in your computer by the Web Browser. Cookies will help us view how you navigate our Website and identify you when you re-access it. Over and above, cookies primarily help us to improve our website, enhance our customer relations, personalize offers to you based on your needs and preferences.

Cookies cannot be used to retrieve data from other cookies which was created by Website other than ours. Most importantly, cookies will not be able to read data stored in your computer hard drive.

You are able to reset your Web Browser to refuse cookies or to highlight when a cookie is being sent to you. However, some features of our website may not function properly if the ability to accept cookies is disabled.

5. Impact of Non-Provision of Personal Data

Please note that in the event that sufficient Personal Data is not supplied, or is not satisfactory to us, then your registration of account or transaction may not be accepted or acted upon or your request to browse some information on the Site, or the use of, or subscription to, or purchase of any products and/or services offered by the Company may be denied or affected.

6. Legal basis for processing the data (Lawfulness of processing)

You shall take note that, all the activities may be monitored and recorded. Anyone using our Site expressly consents to such monitoring and recording.

You agree to give your explicit consent to the Company so the latter can request, collect, use, administrate and operate your personal data for the purpose of providing our product and/or services in accordance to Company's policies and Company's applicable laws and regulations. We collect, process, transfer and store persona data solely in connection to your consent and to the legitimate interest arising from the relationship between you and us and in connection.

Processing is necessary for the performance of a contract to which you are party or in order to take steps at the request of your prior to entering into a contract;

Processing is necessary in order to protect the vital interest of the data subject or of another natural person;

Processing is necessary for compliance with a legal obligation to which the controller is subject;

In case we intend to use your personal data for a purpose other than the initial one you have agreed to, we shall provide the data subjects with prior to the actions information and we shall not use the data without your explicit consent, regarding the new purpose.

7. Purpose for data collection

Your data is collected in order to:

- a. Operate and maintain your request including accounting, information system management, system testing, maintenance and development, operational, support, customer surveys, customer relations.



HERZEN INTERNATIONAL CORPORATION (IO3468)

- b. Optimize our marketing efforts.
- c. Send you information about new product and newsletters including announcement.
- d. Monitor the usage of our product and analyze emerging trends.
- e. With your consent, provide you with personalized ads if the Site supports them.
- f. Protect your vital interests and those of others.
- g. For any other purposes that is required or permitted by any law, regulations, guidelines and/or relevant regulatory authorities.

8. Your Rights

You have the right to:

- a. Request from us access to the personal data that we hold about you in a portable format.
- b. Request from us correction of any collected personal data. The information may include only the subject of your personal data collection.
- c. Receive a copy of your personal data in electronic format.
- d. Receive information from us about our activities in connection to your personal data, including the purposes of collection and storage, the period of time for storage, the methods of collecting, the presence of automated processing.
- e. Receive your data and transfer them to another administrator.
- f. Object to processing for the purpose of direct marketing
- g. Object to processing on any compelling legitimate grounds, to the processing of personal data, where the basis for that processing is either; public interest; or legitimate interest of the controller.
- h. Lodge a complaint with a supervisory authority if you consider that there is personal data breach.

9. Exercising Your Rights

To exercise your rights you can always contact us by sending mail to us at inquiry@herzen-int.com

For managing your account information, you can use the profile settings feature in our Site.

10. Sharing of Personal Information with Third Parties

We may disclose your personal information to third parties for the purpose stated above. We may disclose personal information to companies and/or organization that act as our agents, contractors,



HERZEN INTERNATIONAL CORPORATION (IO3468)

service providers and/or professional advisors. These third parties are not authorized to retain, share, store or use the personal information for any purposes other than to provide the service they have been hired to provide. We do not sell trade or otherwise share personal information with third parties for the marketing purposes of the third parties.

We may also elect to transfer your personal information to third parties such as law enforcement agencies and government agencies under special circumstances:

- (i) To comply with a legal requirement, judicial proceeding, court order, or legal process served on us or its affiliates.
- (ii) To investigate a possible crime, such as fraud or identity theft;
- (iii) In connection with the sale, purchase, merger, reorganization, liquidation or dissolution of the Company;
- (iv) When we believe it is necessary to protect the rights, property, or safety of us or other persons, or
- (v) As otherwise required or permitted by law, including any contractual obligations of us.

11. Children and Minors Under 18 Years of Age

Our Site is not directed towards children, nor does it intend to provide any of the services or the use of any personal data relating to children under 18 years of age.

You hereby confirm and warrant that you are currently 19 years old or above and you are capable of understanding and accepting the terms of this Privacy Policy. If you are under 18 years old, you may use our website only with the involvement of a parent or guardian.

As a parent or legal guardian, please do not allow minors under your care to submit personal data to Herzen International. In the event that such personal data of a minor is disclosed to Herzen International, you hereby consent to the processing of the minor's personal data and accept and agree to be bound by this Privacy Policy and take responsibility for his or her actions.

We will not be responsible for any unauthorized use of the services on the Site by yourself, users who act on your behalf or any unauthorized users. It is your responsibility to make your own informed decisions about the use of the services on the Site and take necessary steps to prevent any misuse of the services on the Site.

12. Time period for personal data storage

We retain your data for as long as your account is active or is needed for providing you with our product and/or services.

We may hold on to your data for extended periods of time in order to comply with laws, legal request, governmental investigation, or investigation of possible violation of our terms and policies, or otherwise prevent harm.



HERZEN INTERNATIONAL CORPORATION (IO3468)

13. How Do We Protect Your Information

We take the security of your personal data very seriously. We use reasonable administrative, physical, and technical safeguards to secure the personal data you share with us.

The security of your use of Site relies on your protection of your electronic device. You may not share your instance of the electronic device with anyone. If you believe that an unauthorized access to your instance of the electronic device has occurred, please report it immediately at [inquiry@herzen-int.com]. If you believe someone else have obtained access to your password, please change it immediately and report it immediately by emailing [inquiry@herzen-int.com].

14. Modification of Policy

Each time you access our Site, the current version of the Policy will apply. Accordingly, you should check the Policy from time to time and review any changes since the last version. The Policy is accessible within our Site at Privacy Policy and available at – [<https://www.herzen-int.com>].

Unless stated otherwise, our current Policy applies to all information that we have about you.

15. Breach measures

In case of personal data breach, we will undertake every possible action in an appropriate and timely manner, to avoid any material or non-material damage to the data subjects. Breaches in the security may include identity theft, identity fraud, limitation of rights, unauthorized access to your account, loss of confidentiality of personal data, etc. As soon as the controller becomes aware of the breach, you and the competent authorities will be notified immediately. You may be asked to follow certain instruction for prevention of breaches including but not limited to password or username change.

16. Contact Us

To contact us with your questions or comments regarding this Policy or the information collection and dissemination practices of us relevant to your use of the services, Please email us at [inquiry@herzen-int.com]

CUSTOMER HEREBY CONFIRMS TO HAVE RECEIVED, READ AND UNDERSTOOD ALL THE ABOVE PRIVACY POLICY AND AGREES TO BE BOUND BY THEM.