

**PAYEE’S REPRESENTATIVE
PRIVACY NOTICE**

1. About this document

This Privacy Notice (“**Notice**”) describes how and why we, Ozon Holdings PLC (“**We**”, “**Us**” or “**Ozon**”), collect, store, use, share and otherwise process your personal information when you, as a person legally authorized to represent a respective Payee and acting on their behalf, ask us to pay the Cash Redemption Amount under the Deed Poll granted by Ozon on 25 October 2022 (“**Deed Poll**”) and submit the relevant payment instructions, including any supplements to such instructions, (“**Eligibility Instruction**”) to us.

When carrying out the activities described in this Notice, we act as the sole data controller. It means that we alone determine the exact purposes and means of processing of your personal information.

Any other terms (starting with capitalized letters) in this Notice have the meanings given to them in the Deed Poll.

2. About processing of your personal information

We obtain the following personal information directly from you, as Payee’s legal representative, and not from other sources when you, as Payee’s legal representative, fill out the Eligibility Instruction and submit it to us:

- your full first name, last name and, if any, patronymic;
- your capacity (full title) in which you act as Payee’s legal representative;
- your contact details (email and telephone number);
- power of attorney or similar document authorizing you to act as Payee’s legal representative when executing the Eligibility Instruction on behalf of the Payee.

If you are to receive the Cash Redemption Amount instead of the Payee you represent, we also obtain the following personal information directly from you and not from other sources:

- your bank details for payment of the Cash Redemption Amount as detailed in the Eligibility Instruction;
- your tax identification number certificate;
- your passport or similar document confirming individual’s personality (containing photo and identification number of an individual) and citizenship.

We process this personal information as follows:

Purpose of processing	Storage period	Legal basis for processing
To comply with Cyprus tax and accounting laws, i.e. by keeping the Eligibility Instruction and the enclosed documents for tax and accounting purposes, and providing them to the relevant government authorities	For a statutory period of six (6) years starting from the moment we pay the Cash Redemption Amount	Legal obligation to keep books and records for any transaction (payment) we make to third parties
To secure our legitimate interests, namely for the establishment, exercise or defence of legal claims to identify you as Payee’s legal representative and to prove that we performed all our obligations to pay under the Deed Poll	For a limitation period under the law applicable to the Deed Poll, i.e. twelve (12) years, starting from the moment we receive the Eligibility Instruction	Our legitimate interests , namely for the establishment, exercise or defence of legal claims to identify you as Payee’s legal representative and to prove that we performed all our obligations to pay under the Deed Poll

If you are to receive the Cash Redemption Amount instead of the Payee you represent, we also process this personal information as follows:

Purpose of processing	Storage period	Legal basis for processing
To identify you as an authorized person to receive the Cash Redemption Amount and perform our obligations to pay under the Deed Poll	Until we pay you the Cash Redemption Amount in full	Performance of a contract , i.e. the Deed Poll
To check whether you are a sanctioned person under EU and Cyprus sanction laws		Legal obligation not to deal with any sanctioned person under EU and Cyprus sanctions laws as we are not allowed to deal with such persons, as well as pay them, under such laws as a Cyprus legal entity
To check whether you are a sanctioned person or a resident of sanctioned territories under applicable non-EU sanctions laws	For a period of up to six (6) years starting from the moment we pay you the Cash Redemption Amount as we must be able to demonstrate that we have properly conducted a sanctions check under such non-EU sanctions laws	Our legitimate interests , namely to ensure that we do not deal with any sanctioned person or resident of sanctioned territories in accordance with sanctions laws of non-EU countries where we engage in commercial activity, otherwise operate or to which there is otherwise nexus resulting from our performance of the obligations under the Deed Poll

Please note that if you want us to pay the Cash Redemption Amount under the Deed Poll, provision of your personal information is a requirement necessary to enter into a contract with us, i.e. the Deed Poll, as well as a statutory requirement as mentioned above in the table. Therefore, if you decide not to share personal information with us, we will not be able to perform our obligations and pay the Cash Redemption Amount under the Deed Poll.

We do not process this personal information for direct marketing purposes and do not rely on automated decision-making.

3. About transfer of your personal information

In the course of the activities described in this Notice we share your personal information with the following categories of recipients:

- Ozon’s affiliates and subsidiaries; and
- third-party advisers and contractors we, our affiliates or subsidiaries use to perform sanctions screening and consult on performance under the Deed Poll, as well as banks and other payments institutions enabling transfer of the Cash Redemption Amount.

We always ensure that such recipients adhere to privacy standards at least as protective as in this Notice and are subject to the strictest confidentiality obligations.

If such recipients are located outside the European Economic Area (EEA), we share your personal information only when:

- recipient’s country has an adequate level of privacy protection (no less than in the EEA); or

- we use additional protective measures to secure your personal information and mitigate any potential risks associated with this transfer from the EEA. All our contracts with the non-EEA recipients of your personal information always include Standard Contractual Clauses supported by other legal, organizational and technical measures we take. These measures are encryption, pseudonymization, other appropriate security controls, as well as internal policies and procedures necessary to implement best privacy standards, etc. Send us a request to privacy@ozon.com to receive a copy of these Standard Contractual Clauses or to know more about the other safeguards we use.

4. About your privacy-related rights

This section describes in detail what rights you have and how you can exercise such rights.

Right to	Description	How to exercise
Access	You have the right to know how we process your personal information and ask us to send you a copy of such information	Refer to this Notice to know about your personal information processing; and/or Send us a request to privacy@ozon.com to receive a copy of your personal information
Rectification	You have the right to ask us to correct, update or complete your personal information if you believe such information is incorrect, outdated or incomplete	Send us a request to privacy@ozon.com
Erasure	You have the right to ask us to delete your personal information	Send us a request to privacy@ozon.com
Objection to processing	You have the right to object to processing of your personal information by Ozon on grounds relating to your particular situation. This right only applies when legal basis for such processing is Ozon’s legitimate interests (to know more about legal basis refer to the section “2. About processing of your personal information” above)	Send us a request to privacy@ozon.com
Restriction of processing	You have the right to ask us to cease processing of your personal information when: – you contest accuracy of your personal information – for a time we check accuracy of such information; – you believe that processing of your personal information is	Send us a request to privacy@ozon.com

	<p>unlawful but you do not want us to delete such information;</p> <p>– we want to delete your personal information but you ask us to keep it for establishment, exercise or defence of legal claims;</p> <p>– you object to processing – for a time we decide whether we can keep your personal information or not</p>	
Data portability	<p>You have the right to ask us to prepare a copy of your personal information in electronic form and transmit it to a specific third party to be further used there.</p> <p>This right only applies when legal basis for such processing is performance of a contract (to know more about legal basis refer to the section “2. About processing of your personal information” above)</p>	Send us a request to privacy@ozon.com
Lodge a complaint	<p>If you believe that we somehow violate your privacy rights, you can address your concerns to the Cyprus Commissioner for Personal Data Protection or your local data protection authority</p>	Send a complaint to the Cyprus Commissioner for Personal Data Protection ¹ or your local data protection authority in the form admissible by them

5. Contact us

Ozon Holdings PLC is a legal entity established and operating under the laws of the Republic of Cyprus with a registered office at Arch. Makariou III, 9th Floor 2-4, Capital Center, Nicosia 1065, Republic of Cyprus.

Our email for all privacy-related issues: privacy@ozon.com.

By signing this Notice, I acknowledge that I have read and understood its provisions.

Signature

Full name

Date

¹ Cyprus Commissioner for Personal Data Protection: <https://www.dataprotection.gov.cy/>; email: commissionerdataprotection.gov.cy; Office address: Iasonos 1, 1082 Nicosia, Cyprus; Postal address: P.O. Box 23378, 1682 Nicosia, Cyprus; Tel: +357 22818456; Fax: +357 22304565.