

## **Privacy policy**

This Privacy policy (hereinafter referred to as the Policy) applies to all information that the IE Torbosov Oleg Nikolaevich TIN 742201522728, PSRN 317745600003360 (hereinafter referred to as the Company) and / or its affiliates, including all persons belonging to the same group with the IE Torbosov (hereinafter referred to as the Group), or its official partners (hereinafter referred to as the Partners), can get information about the user while using any of the sites, services, programs and products of the Company (hereinafter referred to as the Services). The user's consent to the provision of personal information given by him in accordance with this Policy within the framework of relations with one of the persons belonging to the Group or the Partners applies to all persons belonging to the Group of the Company and the Partners.

Use of the Services means the unconditional consent of the user to this Policy and the conditions for processing his personal information specified therein; in case of disagreement with these conditions, the user must refrain from using the Company's Services. If any changes and additions are made to this Policy, with which the user does not agree, he is obliged to stop using the Services.

### **1. General Provisions**

1.1. The company, created and operating in accordance with the legislation of the Russian Federation, and being the site administrator, strictly adheres to the policy of preventing the unauthorized use of personal data received from each of the visitors (users) of the above website (hereinafter referred to as the Site, Sites).

1.2. This Policy determines the procedure for handling personal data of the Users of the Sites.

1.3. Sequencing the handling of personal data is aimed at ensuring the observance of the legal rights and interests of Users, ensuring the protection of their rights and freedoms in the processing of personal data, including the protection of the rights to privacy, personal and family secrets in connection with the need to obtain, collect, systematize, analysis, storage and, if necessary, transfer (provision of access) within the limits of the information constituting personal data defined by this Privacy in order to achieve the legitimate goals of the Sites / Services.

### **2. Personal data**

2.1. Within the framework of this Policy, «personal information (data) of the user» means:

2.1.1. Personal information that the user provides about himself independently when registering (creating an account) or in the process of using the site (partner sites), including personal data of the user (last name, first name of the User; email address of the User; phone number of the User; other similar information reported about himself by the User on the basis of which identification of the subject of personal data is possible). Information required for the provision (provision of services) is marked in a special way. Other information is provided by the user at his discretion.

2.1.2. Data that is automatically transmitted to the Company's Services in the course of their use using the software installed on the user's device, including the IP address, information from cookies, information about the user's browser (or other program).

2.2. Information about the User's personal data is classified as confidential (constituting a legally protected secret of the Sites). The non-disclosure requirements to personal data are disclaimed:

- in case of depersonalization;
- after 50 years of storage period;
- in other cases stipulated by federal laws.

2.3. This Policy applies only to the Services of the Company. The Company does not control and is not responsible for the websites (services) of third parties to which the user can click on the links available on the Company's website, including in the search results. On such sites (services) the user's personal information may be collected or requested, as well as other actions may be performed.

2.4. The company generally does not verify the accuracy of personal information provided by users and does not control over their legal capacity. However, the Company assumes that the user provides reliable and sufficient personal information on the questions in the registration form, and keeps this information up to date. When providing inaccurate personal data, the Company has the right to delete the User's account without giving any reason or notice.

2.5. The User is hereby notified and gives his consent to allow access to strictly defined personal data for the software of third parties – the Partners – in cases strictly limited by the Company. This access is provided in order to improve the efficiency of the Company's Sites for a more efficient provision of services requested by the User.

### 3. Purposes of collecting and processing personal information of users

3.1 The Company collects and stores only those personal data that is necessary for the provision of Services (execution of agreements and contracts with the user).

3.2. The Company can use the user's personal information for the following purposes:

3.2.1. Identification of the party under agreements and contracts with the Company;

3.2.2. Providing the user with personalized Services;

3.2.3. Communication with the user, including sending notifications, requests and information regarding the use of the Services, the provision of services, as well as processing requests and applications from the user;

3.2.4. Improving the quality of the Services, ease of use, development of new Services and services;

3.2.5. Targeting advertising materials;

3.2.6. Conducting statistical and other studies based on anonymized data.

### 4. Processing of personal data

4.1. The source of information about all personal data of the User is the User himself. The Company does not receive and does not process personal data from other sources, with the exception of the user's personal data received by the Company when it performs registration

actions on the Site using authorization through the services and sites of third-party Operators.

4.2. Confidentiality of the user's personal information is preserved, except in cases of voluntary provision by the user of information about himself for general access to an unlimited number of persons. When using certain Services, the user agrees that a certain part of his personal information becomes publicly available (publication of a personal announcement) or transferred to the Company's Partners.

4.3. The user undertakes to provide the Sites with only reliable information about himself.

4.4. When determining the volume and content of processed personal data, the Company is guided by the Constitution of the Russian Federation, Federal Law No. 152-FZ dated July 27, 2006 (as amended on June 4, 2014) «About Personal Data».

4.5. The Company can use the user's personal information for the following purposes:

4.5.1. Identification of the party under agreements and contracts with the Company;

4.5.2. Providing the user with personalized Company Services;

4.5.3. Communication with the user, including sending notifications, requests and information regarding the use of the Company's Services, the provision of services, as well as processing requests and applications from the user;

4.5.4. Improving the quality of the Company's Services, ease of use, development of new Company Services and services;

4.5.5. Targeting advertising materials;

4.5.6. Conducting statistical and other studies based on anonymized data;

4.5.7. Transfer to the partners of the Company in order to develop a strategy for improving the quality of the services provided and the development of new services of the partners of the Company and services.

## 5. Transfer of personal data

5.1 The Company has the right to transfer the User's personal information to third parties in the following cases:

5.1.1. The user gave his consent to such actions;

5.1.2. The transfer is necessary as part of a certain Service or to provide a service to the User;

5.1.3. The transfer is conditioned by Russian or other applicable law within the framework of the procedure established by law;

5.1.4. The transfer is conditioned as part of the sale or disposal of business (in whole or in part), while all obligations to comply with the terms of this Policy are received by the acquirer;

5.1.5. In order to ensure the possibility of protecting the rights and legitimate interests of the Company or third parties in cases where the User violates the terms of this Policy or the terms of the Company's User Agreement.

5.2. With the personal data of Users, the Company carries out all legal necessary actions related solely to achieving the goal of providing the services ordered by the User, including the placement of ads and their further promotion among an unlimited number of persons, as well as other services on the Sites.

5.3. When transferring the User's personal data, the Company must comply with the following requirements:

5.3.1. Do not provide the User's personal data to a third party without the User's consent, except in cases established by federal law.

5.3.2. Do not provide the User's personal data for commercial purposes without his consent. The processing of the User's personal data in order to promote goods, works, services on the market by making direct contacts with a potential consumer using means of communication is allowed only with the User's prior consent.

5.3.3. Warn the persons who have received the User's personal data that these data can be used only for the purposes for which they are communicated, and require these persons to confirm that this rule has been observed.

5.3.4. Persons who have received the User's personal data are required to comply with the non-disclosure requirements.

5.3.5. Transfer personal data of Users within the limits and in accordance with this Policy.

5.3.6. The personal data of Users are processed and stored on the server in encrypted form in a restricted access mode.

5.4. Personal data of Users can be obtained, processed and transferred to storage in electronic form (via a local computer network and the Internet).

## 6. Access to personal data

6.1. The Company undertakes to ensure that unauthorized and inappropriate access to the personal data of the Users of the Company's Website is prevented. At the same time, authorized and targeted access to the personal data of the Users of the Sites will be considered the access of all interested parties, implemented within the framework of the objectives of the activities and topics of the Company's Sites.

At the same time, the Company is not responsible for possible misuse of the Users' personal data, which occurred as a result of:

technical malfunctions in the software and hardware and networks outside the control of the Company;

due to the intentional or unintentional use of the Company's Sites not for their intended purpose by third parties;

transfer of access passwords, other information from the Sites by the Users themselves to other persons who do not have access to this information.

The Company guarantees the Users not to provide their personal data to third parties who declare in advance about their possible misuse.

6.2 The Company takes the necessary and sufficient organizational and technical measures to protect the user's personal information from unauthorized or accidental access, destruction, alteration, blocking, copying, distribution, as well as from other illegal actions of third parties with it.

## 7. Information messages

7.1. By registering on the Company's website, the User agrees to receive newsletters via e-mail, weekly or periodically.

7.2. The user can create a subscription according to his own parameters and unsubscribe from it in the «Personal Account». The User can unsubscribe from the weekly newsletter by following the link at the bottom of the received letter, or by contacting the support service.

7.3. The Company does not transfer the User's personal data to third parties without his consent, except as otherwise provided by the legislation of the Russian Federation.

## 8. Changes to the Privacy Policy. Applicable law

8.1. The Company has the right to make changes to this Policy without any special notification to Users. When making changes in the current edition, the date of the last update is indicated. The new version of the Policy comes into force from the moment it is published, unless otherwise provided by the new version of the Policy.

8.2. The law of the Russian Federation shall apply to this Policy and the relationship between the User and the Company arising in connection with the application of the Policy.

## 9. Feedback. Questions and suggestions

9.1. All suggestions or questions regarding this Policy should be reported to the User Support Service of the Company, to the email address: [rrmolodetskiy@gmail.com](mailto:rrmolodetskiy@gmail.com) or by phone number: +7 (925) 329-98-58

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