## **PRIVACY POLICY**

This Privacy Policy (hereinafter - Privacy Policy) applies to all information placed by CJSC "Safe Technologies" (registered at: 15D, Krasnogvardeisky per., St. Petersburg, The Russian Federation, 197342) on the official Internet Site at: <u>https://safe-cat.com/</u> (hereinafter - Site), which subjects can get about the User while using the Site, its services, programs and products.

### 1. Definition of terms

The following basic concepts are used in the Privacy Policy:

website administration (hereinafter referred to as Administration) - authorized employees for Website management, acting on behalf of CJSC "Safe Technologies";

automated processing of personal data – the processing of personal data by means of computer technology;

**blocking of personal data** – temporary termination of the processing of personal data (except if the processing is necessary to clarify personal data);

**information system of personal data** - a set of personal data contained in databases and providing their processing of information technologies and technical means;

**personal data confidentiality** - the obligation of persons who have received access to personal data not to disclose to third parties and not to distribute personal data without the consent of the subject of personal data, unless otherwise provided by federal law;

**depersonalization** of personal data is an action, as a result of which it becomes impossible, without using additional information, to determine the belonging of personal data to a specific subject of personal data;

**personal data processing** - any action (operation) or set of actions (operations) performed using automation facilities or without using such facilities with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, removal, deletion, destruction of personal data.

**website user (hereinafter - the User)** - a person, who has access to the Website, via the Internet and uses the Website;

**personal data** - any information relating to a directly or indirectly defined or determined individual (subject of personal data);

**provision of personal data** - actions aimed at disclosing personal data to a specific person or a certain circle of persons;

**personal data distribution** – actions aimed at disclosure of the personal data to an indefinite circle of persons (transfer of the personal data) or on familiarization with the personal data of an unlimited circle of persons, including disclosing of the personal data in mass media, placing in information-telecommunication networks or provision of access to the personal data in any other way;

**cross-border transfer of personal data** – personal data transfer to the territory of a foreign state to the authority of a foreign state, to a foreign individual or to a foreign legal entity;

**personal data destruction** - actions that make it impossible to recover the personal data content in the personal data information system and (or) as a result of which the personal media are destroyed;

**cookies** - a small piece of data sent by a web server and stored on a user's computer or mobile device, which a web client or web browser each time sends to a web server in an HTTP request when trying to open a page of the corresponding site;

**IP-address** - a unique network address of a node in a computer network built using the IP protocol.

# 1. General provisions

- 1.1. Use of the Website resources shall mean the User's unconditional consent to this Policy and terms of processing of its personal information specified herein; in case of disagreement with these terms and conditions, the User shall stop using the Website.
- 1.2. This Privacy Notice applies only to this Website. The Website does not control and is not responsible for the sites of the third parties, to which the User may access via the links available at the Website.
- 1.3. The Administration shall not check reliability of the personal data provided by the User of the Website.
- 1.4. This privacy Policy has been developed in the current legislation of the Russian Federation, including federal law of 27 July 2006 No. 152-FZ "On personal data".

## 2. Subject of privacy policy

- 2.1. The subject of this Policy is personal data of the User, which the User deliberately and voluntarily transfers to the Website Administration by filling out forms, including
  - Name of the organization
  - Address:
  - Contact details (title, surname/name)
  - Phone
  - E-mail

- Additional information required to clarify the details of the request (link to a personal website or social networks, organization details, etc.).

- 2.2. The Company also receives data, which is automatically transmitted during the browsing process when visiting the Site:
  - Cookies file data
  - IP address
  - Date, time and number of visits
  - Information provided by your browser (device type, browser type and version, operating system, etc.)
  - Referrer (previous page address).
- 2.3. Personal data is not distributed or transferred to third parties.

## 3. Purposes of collecting user's personal information

The Administration may use the Personal Data of the User for the purposes:

- 3.1. To establish feedback with the User, including sending notices, clarifications concerning forms of communication for the purpose of rendering the services, processing requests and applications from the User.
- 3.2. Confirmation of accuracy and completeness of the personal data provided by the User.
- 3.3. Determining the location of the User to ensure security, prevent fraud.

- 3.4. Provision of effective client and technical support to the User at appearance of problems connected with the use of the site.
- 3.5. Performing advertising activity with the User's consent.
- 3.6. Carrying out of marketing, statistical (including web analytics services) and other researches based on impersonal data.

### 4. Terms of processing and storage of personal information

- 4.1. Processing of the User's personal data is performed without limitation of time, by any legal means, including information systems of personal data with or without the use of automation means.
- 4.2. The User can at any time change (update, supplement) the personal information provided by him or her, or a part of it, by writing a request to the site support service by e-mail pr@zaobt.ru.
- 4.3. The User agrees that the Administration shall be entitled to transfer the personal data to third parties, in particular to courier services, postal organizations, telecommunication operators, solely for the purpose of performance of the User's order, posted on the Website, including delivery of the Goods.
- 4.4. The User's personal data may be transferred to the authorized state authorities of the Russian Federation only on the grounds and according to the procedure, established by the legislation of the Russian Federation.
- 4.5. In case of loss or disclosure of personal data, the Administration shall inform the User about loss or disclosure of personal data.

#### 5. Measures used to protect personal information of Users

- 5.1. Responsible persons shall take necessary and sufficient organizational and technical measures to protect personal information of the User from illegal or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties with it.
- 5.2. Responsible persons together with the User take all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the User's personal data.

#### 6. **Obligations of the parties**

- 6.1. The Website User is obliged to:
  - Provide information about personal data necessary to use the Site.
  - Update, supplement the provided information about personal data in case of changes in this information.
- 6.2. Employees admitted to the personal data processing are obliged to:
  - Ensure storage of confidential information in secret, not to disclose it without prior written permission of the User, as well as not to sell, exchange, publish or disclose the User's personal data by other possible means.
  - To take precautionary measures to protect the confidentiality of the User's personal data according to the procedure usually used to protect such information in the existing business turnover.
- 6.3. Employees admitted to the personal data processing are prohibited to:

- communicate the information that constitutes personal data to persons who do not have the right of access to this information;
- make unaccounted copies of documents containing personal data;
- leave documents containing personal data on their desktops without supervision;
- take documents containing personal data out of premises without official necessity.
- 6.4. In case the confidential information is lost or disclosed, the Website Administration shall not be liable if the confidential information:
  - Had been in the public domain before its loss or disclosure.
  - Had been received from the third party before it was received by the Website Administration.
  - Was disclosed with the User's consent.

### 7. Other provisions

- 7.1. The current legislation of the Russian Federation shall apply to this Privacy Policy and relations between the User and the Administration.
- 7.2. Before filing a claim to court on disputes arising out of the relationship between the User and the Administration, a claim (written proposal for voluntary settlement of a dispute) shall be mandatory.
- 7.3. Within 30 (thirty) calendar days from the date of receipt of the claim, the Recipient of the claim shall notify the Applicant in writing about the results of consideration of the claim; in case of failure to reach an agreement, the dispute shall be submitted for consideration to a judicial body in accordance with the current legislation of the Russian Federation.

#### 8. Additional conditions

- 8.1. The Website Administration is authorized to make amendments to this Privacy Policy without the consent of the User.
- 8.2. The new Privacy Policy shall come into effect from the moment of its placement on the Website, unless otherwise stipulated by the new version of the Privacy Policy.
- 8.3. The current version of the Privacy Policy is available at <u>https://safe-cat.com/privacy-policy</u>. Any suggestions or questions regarding this Privacy Policy should be reported:
  - by phone +7 (812) 339-04-58
  - by e-mail to <u>pr@zaobt.ru</u>.
  - via the feedback form on the website <u>https://safe-cat.com/</u>.