

CONFIDENTIALITY POLICY

Publication date: May 23, 2018.

This Confidentiality Policy (hereinafter, the "Policy") applies with respect to all information, including personal data as defined in the legislation of the Russian Federation, which the Administrator of this Website (hereinafter referred to as the "Administrator" and the "Website", respectively), hosted at the domain name www.ЧестныйЗНАК.РФ, may receive about the Website user during the use of the Website by the latter, and about the Administrator's programs, products and services available on it. Use of any programs, products or services of the Administrator by the user may be regulated by additional conditions that may introduce amendments and/or supplements to this Policy.

1. TERMS AND DEFINITIONS

1.1. The following terms are used in this Confidentiality Policy:

1.1.1. "Administrator" shall mean Center for Research in Perspective Technologies Limited Liability Company, a legal entity established under the legislation of the Russian Federation.

1.1.2. "Administration" shall mean the Administrator's employees duly authorized to manage the Website, who act on behalf of the Administrator, organize and/or perform personal data processing, and define the goals of personal data processing, the scope of personal data to be processed, and the actions (operations) performed with personal data. Hereinafter, the term "Administration" used individually shall include the term "Administrator".

1.1.2. "Personal Data" or "Personal Information" shall mean any information about a directly or indirectly identified or identifiable individual (Personal Data subject).

1.1.3. "Personal Data Processing" shall mean any action (operation) or set of actions (operations) performed with Personal Data with or without the use of automation tools, including collection, recording, filing, accumulation, storage, refining (updating, alteration), retrieval, use, transfer (distribution, provision, access), depersonalization, blocking, deletion and destruction of Personal Data.

1.1.4. "Personal Data Confidentiality" shall mean a requirement binding upon the Administration or upon another person who has received access to Personal Data to prevent their distribution without the consent of the Personal Data subject or other lawful grounds.

1.1.5. "Administrator's Partners" shall mean legal entities or individuals that are the Administrator's counterparties.

1.1.5. "Website User (hereinafter, "User")" shall mean a person who has access to the Website via the Internet and uses the Website.

1.1.6. "Cookies" shall mean a small data fragment sent by the web server and stored on the user's PC, which the web client or web browser forwards to the web server in an HTTP request each time the corresponding web page is opened.

1.1.7. "IP Address" shall mean the unique network address of a node in a computer network that is based on the IP protocol.

2. GENERAL PROVISIONS

2.1. By using the Website, the User agrees to this Confidentiality Policy and the terms and conditions of the processing of the User's Personal Data.

2.2. If the User does not agree to the terms and conditions of this Policy, the User shall stop using the Website.

2.3. The Policy applies to the Website only. The Administration does not control or bear liability for any websites of third parties to which the User may go using links available on the Website.

2.4. The Administration does not verify the accuracy of Personal Data provided by the Website User.

2.5. Relations between the User and the Administration associated with Personal Data processing shall be governed by the current legislation of the Russian Federation.

3. SUBJECT MATTER OF THE CONFIDENTIALITY POLICY

3.1. The Policy sets out the rules applied by the Administration for the purpose of non-disclosure and protection of the confidentiality of the Personal Data which the User provides upon the request of the Administration, during User's registration on the Website, or when performing any other action on the Website.

3.2. Personal Data allowed for processing hereunder, which shall be provided by the User by filling out the registration form on the Website, shall include the following information:

- 3.2.1. the User's full name;
- 3.2.2. the User's contact telephone number;
- 3.2.3. e-mail address;
- 3.2.4. the person (company) for the benefit of whom the user performs actions on the Website.

The User may provide other Personal Information in various sections of the Website, in which case the User agrees that such Personal Information will be processed on the terms and conditions set out herein. If the User thinks that some of User's Personal Data stored by the Administration are incorrect or incomplete, the User may enter his/her account and correct Personal Data on his/her own.

3.3. The Administration protects Data that are transferred automatically when viewing ad blocks and visiting web pages where the system's statistics script ("pixel") is installed:

- IP address;
- cookies data;
- information about the browser and its ID (or other software that provides access to advertising);
- access time;
- address of the web page where the ad block is hosted;
- referrer (previous web page address);
- HTTP headers, IP address, web beacons / pixel tags, hardware and software data;
- date and time of access to the Website;
- geolocation data.

3.3.1. Switching off cookies may disable access to the sections of the Website requiring authorization.

3.3.2. The Website collects statistical data on the IP addresses of its users. This information is used to identify and solve technical problems and to control the lawfulness of actions performed on or in connection with the use of the Website.

3.4. Any other Personal Information not stipulated above (transaction history, browsers and operating systems in use, etc.) shall be retained and shall not be disclosed, except as otherwise set out in Clauses 5.2 and 5.3 hereof.

4. PURPOSES OF COLLECTING THE USER'S PERSONAL INFORMATION

4.1. The Administration may use the User's Personal Data for the following purposes:

- 4.1.1. To identify a User registered on the Website.
- 4.1.2. To grant the User access to the personalized resources of the Website.
- 4.1.3. To establish feedback communication with the User, including the sending of notifications and requests concerning the use of the Website, provision of services, and processing of the User's queries and applications.
- 4.1.4. To conclude contracts between the User and the Administrator / Administrator's Partners and to send products/items, correspondence, information and other materials to the User subject to his/her consent.
- 4.1.5. To identify the User's location for the purpose of security, fraud prevention, and analysis of Website traffic.
- 4.1.6. To verify the accuracy and integrity of Personal Data provided by the User.
- 4.1.7. To create an account if the User has given his/her consent thereto.
- 4.1.8. To provide customer and technical support to the User in the event of any problems with the use of the Website.
- 4.1.9. To provide the User, subject to his/her consent, with updates of the Administrator's software, a newsletter and other information on behalf of the Administrator or its Partners.
- 4.1.10. To conduct advertising activity subject to the User's consent.
- 4.1.11. To grant access for the User to the websites or services of the Administrator's Partners for the purpose of receiving products, updates, and services.

5. METHODS AND PERIOD OF PERSONAL DATA PROCESSING AND PROTECTION

5.1. The User's Personal Data shall be processed with no limitation on time, in any lawful manner, inter alia, in Personal Data information systems, with or without using automation tools.

5.2. The User agrees that the Administration is entitled to transfer Personal Data to third parties, in

particular, to courier companies, post offices, and telecom carriers, solely for the purpose of fulfilling the User's requests or in furtherance of agreements between the Administrator and/or its Partners and the User, including delivery of products/items, correspondence, information and other materials to the User.

5.3. The User's Personal Data may be transferred to the competent government authorities of the Russian Federation on the grounds and in the manner established by the legislation of the Russian Federation.

5.4. If Personal Data is lost or disclosed, the Administration shall inform the User of the loss or disclosure of the Personal Data.

5.5. The Administration shall take the necessary organizational and technical measures to protect the User's Personal Information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, and from other illegal actions of third parties.

5.6. The Administration, together with the User (subject to the User's cooperation) shall take all necessary measures to prevent losses or other adverse consequences of the loss or disclosure of the User's Personal Data.

5.7. The Administration shall use Personal Information received from the User solely for the purposes specified in Article 4 hereof.

5.8. The Administration shall keep Personal Data secret and shall not disclose them without the prior written permission of the User, and shall not sell, exchange, publish or otherwise disclose the User's Personal Data, except as otherwise set out in Clauses 5.2 and 5.3 hereof.

5.9. The Administration shall block Personal Data pertaining to the corresponding User upon receipt of a query or request of the User or his/her lawful representative or the competent body for the protection of the rights of Personal Data subjects for the period of inspection, upon discovery of any inaccuracy in the Personal Data or any illegal actions.

5.10. The Personal Information of Users will be stored in the Russian Federation. The Administration will process Personal Data and perform the recording, systematization, accumulation, storage, refining (updating, modification), and retrieval of Users' Personal Data using databases located in the territory of the Russian Federation.

5.11. Personal Information can be processed automatically without access thereto by any employee of the Administration. Should such access be needed, it may be granted only to the employees of the Administration who need it to perform their tasks. For the purpose of data protection and confidentiality, all employees must comply with the internal regulations and procedures of Personal Information processing. They shall also implement all technical and organizational safety measures for the protection of Personal Information.

5.12. The Administration shall take precautions to protect the confidentiality of the User's Personal Data according to the procedure usually used to protect such information in existing business practices. The Administration will implement technical and organizational measures to protect Personal Information from unauthorized, accidental, or illegal destruction, loss or modification, unfair use, disclosure or access, and from other illegal forms of processing. These safety measures will be implemented with due regard to the current level of technology, the cost of their implementation, and risks associated with the processing and nature of Personal Information.

6. LIABILITY

6.1. The Website Administration shall be held liable to the User for the use of User's Personal Data by the Administration in breach of the legislation of the Russian Federation, except in the cases provided for in Clauses 5.2, 5.3 and 6.2 hereof.

6.2. The Administration shall not be held liable:

- for the accuracy of Personal Data provided by the User and in the cases when the User's Personal Data have changed, but the User did not inform the Administration about such changes and did not update the Personal Data on the Website;
- for the processing of the User's Personal Data that is available to the public;
- for the processing of the User's Personal Data by order of the User's Personal Data operator in accordance with Article 6 of Federal Law No. 152-FZ dated July 27, 2006 "On Personal Data".

7. ADDITIONAL CONDITIONS

7.1. The Administration shall have the right to amend this Policy without the User's consent. The Administration shall have the right to introduce amendments at its sole discretion, including, without limitation, in cases when such amendments are associated with amendments in the applicable legislation, and when such amendments are associated with changes in the Website's operation.

7.2. The new Policy shall come into force upon its publication on the Website, unless otherwise set out in the new revision of the Confidentiality Policy.

7.3. All proposals or questions regarding this Confidentiality Policy shall be submitted in the respective section of the Website.

7.4. The effective Confidentiality Policy is available at www.ЧестныйЗНАК.РФ.

Updated on May 23, 2018.