

PRIVACY POLICY

Russian Federation, Moscow

Version dd. February 18, 2020

1. GENERAL TERMS

- 1.1. This privacy policy (hereinafter referred to as the “**Policy**”) has been developed in accordance with the Federal Law dd. 27.07.2006 № 152-FL “On personal data” and defines the position and intentions of “Hendel” Limited Liability Company (PSRN 5147746029327, TIN 7724935308, RRC 772401001, address: 115230, Russia, Moscow, Khlebozavodskiy passage, h. 7, bld. 9, room X, office 25G) (hereinafter referred to as the “**Company**”) in the sphere of processing and protection of personal data, in order to respect and protect the rights and freedoms of every single person, and, in particular, the right to personal and family privacy, protection of honor and dignity.
- 1.2. This Policy is posted and/or available on the Internet at the link: http://hendel.pro/assets_/docs/privacy_policy_en.pdf.
- 1.3. This Policy is fully complied by the Executive and employees of the Company.
- 1.4. The Policy applies to all personal data of subjects processed by the Company with and without automation tools.
- 1.5. This Policy is made and published in Russian, English, Spanish, Thai and Vietnamese. If there are discrepancies in the interpretation of the terms of this Policy, the provisions in Russian shall be considered applicable.
- 1.6. Any web-site user has access to this Policy.

2. TERMINOLOGY AND DEFINITIONS

- 2.1. **Personal data** is any information relating directly or indirectly specific or identified individual (citizen).
- 2.2. **Processing of personal data** is any action (operation) or set of actions (operations) with personal data performed with and without automation tools. Such actions (operations) are the following: collection, receiving, recording, systematization, storage, refinement (update, changing), mining, usage, transfer (diffusion, provision, access), anonymization, blocking, deletion, destruction of personal data.
- 2.3. **User** (personal data subject) is any capable individual who uses the web-site to submit an Application.
- 2.4. **Web-site** is a set of information, texts, graphic elements, design, images, photos and videos, and other results of intellectual activity, as well as computer programs contained in an information system that makes such information available on the Internet at <http://www.hendel.pro> (<http://www.hendel.pro/ru>, and respective versions in other languages).
- 2.5. **Application** is a duly executed User’s request for feedback from the Company on issues of interest regarding cooperation with the Company, commercial activities, Company’s products, and other issues.
- 2.6. All other terminology and definitions found in the text of this Policy shall be interpreted in accordance with the legislation of the Russian Federation.
- 2.7. The titles of the Policy headings (clauses) are intended solely for the convenience of using the text of the Policy and do not have a literal legal meaning.

- 2.8. The Policy has been developed and shall be interpreted in accordance with the law of the Russian Federation.
- 2.9. Using the Web-site the User agrees with the Policy and its terms.

3. PERSONAL DATA RECEIVED FROM THE USER

- 3.1. The Company collects, gets access and uses Personal data, technical and other information related to the User who uses the Web-site for the purposes specified in the Policy.
- 3.2. The Company uses cookies, which allow identifying the User. Cookies are the text files that the Web-site saves on the User's device when visiting the Web-site. Information about the types and functioning of cookies is provided in the relevant section of this Policy.
- 3.3. The Company processes only those Personal data that the User has provided to the Company via the Web-site. Personal data include the following information, in particular:
- 3.3.1. full name;
- 3.3.2. e-mail;
- 3.3.3. contact number.
- 3.4. If the Company receives other Personal data from the User in response to the Application, the Company takes all necessary measures to protect these Personal data in accordance with this Policy.
- 3.5. The Company processes the User Personal data until the processing purposes specified in this Policy are achieved.

4. COOKIE

- 4.1. The Company uses the following cookies on the Web-site:

| Cookie name | Cookie owner | Description (functionality and purpose of the cookie-file) | Storage term |
|--------------------|----------------------------|---|---|
| phpsessid | Cookie of the Company | Characterizes the browser session | Limited to the duration of the user session |
| _ym_d | Yandex LLC | This cookie collects the information about the date of the User's first session on the Web-site | 1 year |
| _ym_isad | Yandex.Metrics, Yandex LLC | This cookie is required for Yandex.Metrics. This file helps to check whether the User has an adBlocker or not | 24 hours |

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|----------------------------|----------------------------|--|-------------------------------|
| | | | |
| _ym_uid | Yandex LLC | This cookie is used to collect the information and provide statistics about the use of the Web-site. Cookies collect the information (including information about the number of visitors to the Web-site, the pages they visited, and their location) in an anonymous form | 2 years |
| _ym_visorc_34662820 | Yandex.Metrics, Yandex LLC | This cookie allows to start the session. These cookies are used for WebVisor function in Yandex.Metrics reports, which allow to “Start the session” that means to reproduce the actions of visitors in video format (https://yandex.com/support/metrica/general/counter-webvisor.html). Yandex guarantees that all collected information is depersonalized | 24 hours |
| jv_visits_count_8tnR0oKzyU | www.jivosite.ru | This cookie is required to track the number of visits to the Web-site | |
| _csrf | Cookie of the Company | This cookie checks domain requests and it is used for the Web-site security | Limited by the User’s session |
| _language | Cookie of the Company | This cookie determines the language of the country where the User has logged in | Limited by the User’s session |
| jv_refer_8tnR0oKzyU | www.jivosite.ru | This cookie determines the source from which the Web-site was accessed | |

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|-----------------------|-----------------|---|--|
| jv_utm_8tnR0 oKzyU | www.jivosite.ru | This cookie allows to distinguish the Users | |
|-----------------------|-----------------|---|--|

- 4.2. The User has the right to refuse the use of cookies by selecting the appropriate settings in the browser. The Company has no responsible for the operation of certain functions of the Web-site if the User refuses to use cookies.

5. USER CONSENT FOR PERSONAL DATA PROCESSING

- 5.1. The User agrees for the personal data processing for the following purposes by accepting this Policy when making the Application on the Web-site.
- 5.2. The User's consent for the personal data processing and use is stored in electronic form by the Company.
- 5.3. Personal data processing is carried out without the User's consent in the following cases:
- 5.3.1. personal data is publicly available
 - 5.3.2. at the request of authorized state bodies in cases provided by the Federal Law of the Russian Federation;
 - 5.3.3. personal data processing is carried out for statistical purposes in case of mandatory depersonalization of personal data;
 - 5.3.4. in other cases provided by the law.

6. PURPOSE OF USING THE INFORMATION PROVIDED BY THE USER

- 6.1. The information provided by the User is used by the Company exclusively for the following purposes:
- 6.1.1. establishing and maintaining connection with the User within the Application made by the User to provide information about the Company, its products, commercial activities, as well as to answer other User's questions;
 - 6.1.2. conduction of statistical research on Web-site traffic based on depersonalized data;
 - 6.1.3. determination of the Web-site target audience;
 - 6.1.4. improving the quality of Web-site service and upgrading;
 - 6.1.5. administration of justice, if the Company receives a proper request from the authorized bodies;
 - 6.1.6. satisfying the Russian legislation requirements.

7. PERSONAL DATA PROCESSING PRINCIPLES AND CONDITIONS

- 7.1. Processing and ensuring the security of personal data by the Company is carried out in accordance with the requirements of the Constitution of the Russian Federation, the Federal Law № 152-FL "On personal data", bylaws and other Federal laws that define the cases and features of personal data processing.
- 7.2. The Company adheres the following principles when processing personal data:
- 7.2.1. legitimacy and equitable basis;
 - 7.2.2. limiting the personal data processing to achieve specific, predetermined and legitimate goals;

- 7.2.3. preventing the personal data processing that is incompatible with the purpose of collecting personal data;
 - 7.2.4. prevention of databases merging containing personal data that are processed for purposes that are incompatible with each other;
 - 7.2.5. personal data processing that meet the purposes of its processing;
 - 7.2.6. compliance of processed personal data content and volume with the stated processing purposes;
 - 7.2.7. Provision of the necessary measures for deletion or updating incomplete or inaccurate data.
- 7.3. The Company processes personal data only if there are at least one of the following conditions:
- 7.3.1. personal data processing is carried out with the consent of the personal data subject to the processing of his personal data;
 - 7.3.2. personal data processing is necessary for achieving the purposes stipulated by the law for performing and fulfilling the functions, powers and duties assigned to the operator by the legislation of the Russian Federation;
 - 7.3.3. personal data processing is necessary for the execution of an agreement to which the personal data subject is a party as beneficiary or guarantor, as well as for the conclusion of an agreement on the initiative of the personal data subject or an agreement under which the personal data subject will be the beneficiary or guarantor;
 - 7.3.4. personal data processing is necessary for the execution of the rights and legitimate interests of the Company or the third parties or for achieving socially significant purposes if the rights and freedoms of the personal data subject are not violated;
 - 7.3.5. personal data processing is carried out, access of an unlimited number of persons to which is provided by the personal data subject or at his request;
 - 7.3.6. personal data processing which is the subject for publication or mandatory disclosure in accordance with the Federal law.
- 7.4. The Company has the right to transfer personal data of citizens in cases established by the legislation of the Russian Federation.
- 7.5. The Company has the right to transfer personal data of such citizens to the territory of the Russian Federation for their subsequent processing if the Company receives consent to the personal data processing from Users who are not located at the territory of the Russian Federation.
- 7.6. The Company destroys or depersonalizes personal data when the processing purposes are achieved or if there is no further need to achieve the processing purpose.
- 7.7. The Company does not perform cross-border transfer of personal data received from the User.

8. PERSONAL DATA PROTECTION

- 8.1. The Company shall take necessary and sufficient legal, organizational and technical measures to protect the information provided by Users from unauthorized or accidental access to it, destruction, changing, blocking, copying, provision and distribution of personal data, as well as from other illegal actions in relation to personal data.
- 8.2. The User's personal data is protected by the Company in accordance with the Federal Law of the Russian Federation.
- 8.3. The Company shall take all the necessary organizational, administrative, legal and technical measures when protecting Users' personal data in accordance with Federal Law № 152-FL "On personal data", namely:

- 8.3.1. identification of threats to the personal data security when it is processed in personal data information systems;
 - 8.3.2. application of organizational and technical measures to ensure the personal data security when processing it in personal data information systems, necessary to meet the requirements for personal data protection, the implementation of which ensures the levels of personal data protection established by the Government of the Russian Federation;
 - 8.3.3. use of information security tools that have passed the established procedure of conformity assessment;
 - 8.3.4. assessment of the effectiveness of measures taken to ensure the personal data security before commissioning of the personal data information system;
 - 8.3.5. detection of unauthorized access to personal data and taking measures;
 - 8.3.6. recovery of personal data modified or destroyed due to unauthorized access to it;
 - 8.3.7. establishing rules for accessing personal data processed in the personal data information system, as well as ensuring registration and accounting of all actions performed with personal data in the personal data information system;
 - 8.3.8. control over the measures taken to ensure the personal data security and the level of security of personal data information systems;
 - 8.3.9. record keeping for machine-based personal data storage media;
 - 8.3.10. monitoring the actions of persons related to Users' personal data processing, conducting proceedings on violations of personal data security requirements.
- 8.4. The General Director of the Company carries out the general organization of protection of Users' personal data. In order to coordinate actions to ensure the security of personal data, the Company has appointed persons responsible for ensuring the security of personal data.
- 8.5. Access to the User's personal data has the Company's employees who need personal data in connection with their performance of work duties.

9. USER RIGHTS

- 9.1. The User whose personal data is processed by the Company has the right to receive from the Company:
- 9.1.1. confirmation of personal data processing by the Company;
 - 9.1.2. legal basis and purposes for personal data processing;
 - 9.1.3. information on the methods used by the Company for personal data processing;
 - 9.1.4. name and location of the Company;
 - 9.1.5. information on persons who have access to personal data or to whom personal data may be disclosed on the basis of an agreement with the Company or on the basis of the Federal Law;
 - 9.1.6. the list of processed personal data related to the requesting citizen and the source of its receipt, unless a different procedure for providing such data is provided by the Federal Law;
 - 9.1.7. information on the terms of personal data processing including the terms of its storage;
 - 9.1.8. information on the procedure for exercising the rights by the citizen provided by the Federal Law "On personal data" № 152-FL;
 - 9.1.9. information on the ongoing or proposed cross-border transfer of personal data;
 - 9.1.10. name and address of the person who processes personal data on behalf of the Company;
 - 9.1.11. other information provided by the Federal Law "On personal data" № 152-FL or other Federal Laws;

- 9.2. The User has the right to:
- 9.2.1. request clarification of his personal data, its blocking or destroying if the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing by sending a corresponding request to the e-mail address — info@hendel.pro. At the same time, the User understands that the Company has the right to continue using personal data in cases permitted by the Russian Law.
 - 9.2.2. withdraw his consent for the personal data processing by sending the Company a corresponding request to the email address — info@hendel.pro;
 - 9.2.3. demand elimination of illegal actions by the Company in relation to his personal data;
 - 9.2.4. appeal the actions or omissions of the Company to the Federal service for supervision of communications, information technology and mass communications (Roskomnadzor) or in court if a citizen believes that the Company is processing his personal data in violation of the requirements of the Federal Law № 152-FL “On personal data” or otherwise violates his rights and freedoms;
 - 9.2.5. protect his rights and legitimate interests, including compensation for damages and / or compensation for non-pecuniary damage in court.

10. COMPANY RIGHTS

- 10.1. The Company has the right to conduct statistical and other research based on depersonalized information provided by the User. The Company has the right to grant access to such research to third parties. The User agrees to such research by accepting this Policy.
- 10.2. The Company has the right to provide information about Users to law enforcement agencies or other government agencies in the course within a judicial process or as part of an investigation based on a court decision, enforced request, or cooperation, as well as in other cases provided by the Russian Law.
- 10.3. The Company has the right to provide information about Users to third parties in order to detect and prevent fraudulent actions, to eliminate technical or security problems.

11. LIABILITY

- 11.1. In case of failure to comply with the provisions of this Policy, the Company is liable in accordance with the current legislation of the Russian Federation.
- 11.2. The Company has no responsibility for the accuracy and completeness of the personal data provided by the User.

12. FINAL PROVISIONS

- 12.1. The Company reserves the right to make changes to the Policy. In case of significant changes to the provisions of this Policy, such as the purpose of personal data processing, the period of storage of personal data, the introduction of cross-border data transfer, the Company shall notify the User of the planned changes and the date of entry into force of the new version of the Policy.
- 12.2. The new version of the Privacy Policy shall take effect from the moment it is published on the Web-site in Russian.
- 12.3. If the User does not agree with the terms of the Policy, the User shall not use the Web-site.
- 12.4. This Policy is developed in accordance with the legislation of the Russian Federation. In case of changes in the Russian legislation on personal data protection, this Policy shall be brought into compliance with the current legislation within a week from the date of entry into force of such changes.