# **Privacy Policy**

Please, note: this text is a translation of the Privacy Policy, originally written in Russian. In case of any differences or inconsistencies between the original version and the translation, the Russian version will be considered the authoritative and legally binding document.

This Privacy Policy for personal data (hereinafter - "Privacy Policy") applies to all information that may be collected by the website located at the domain name widgenta.com (hereinafter - "Site"), while the User is using the Site, its programs, and products.

#### 1. Terms and definitions

The following terms are used in this Privacy Policy:

"Confidentiality of personal data" - mandatory requirement to prevent distribution of personal data without the consent of the subject of personal data or other legal grounds.

"Cookies" - piece of data sent by a web server and stored on the User's computer, which the web client or web browser sends back to the web server with subsequent HTTP requests when trying to access a page of the corresponding website.

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

"Personal data" - any information that directly or indirectly relates to an identified or identifiable individual (subject of personal data).

"Personal data processing" - any action (operation) or set of actions (operations), both automated and non-automated, performed with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

"Site" - set of software and hardware for a computer that enables the publication of information and data united by a common purpose for public access, through technical means. It serves to provide communication between computers on the Internet. The Site is located on the Internet at widgenta.com.

"Site's Owner" - Widgenta LLC, Individual Tax Payer Number (INN) 7840090250, Primary State Registration Number (OGRN) 1197847221285.

"Site's Administration" - authorised individuals acting on behalf of Widgenta LLC who manage the Site, organise and (or) process personal data, as well as determine the purposes of personal data processing, the composition of personal data subject to processing, and the actions (operations) performed with personal data.

"Site User" ("User") - individual who has access to the Site via the Internet and uses the Site.

# 2. General provisions

- 2.1. Use of the Site by the User means acceptance of this Privacy Policy and the terms of the User's personal data processing.
- 2.2. If the User does not agree with the terms of this Privacy policy, the User is to cease any use of the Site.
- 2.3. This Privacy Policy applies only to the Site. The Site does not control and is not responsible for third party website to which the User can access through the links available on the Site.
- 2.4. The Site's Administration does not verify the accuracy of personal data provided by the User.

#### 3. Subject of Privacy Policy

3.1. This Privacy Policy establishes the obligations of the Site's Administration regarding the non-disclosure and protection of the confidentiality of personal data provided by the User upon the request of the Site's Administration when registering on the Site or when filling out different forms.

- 3.2. Personal data permitted for processing under this Privacy Policy is provided by the User by filling out the registration form on the Site and includes the following information:
  - User's name (First name, Last name, Patronymic);
  - User's contact phone number;
  - Email address;
  - User's place of residence;
  - Other information.
- 3.3. The Site protects personal data that is automatically transmitted when visiting the Site's pages on which the statistical system script is installed:
  - IP address;
  - Information from cookies;
  - Information about the browser and page address (or other program that accesses the display of the Site);
  - Access time;
  - Referrer (address of the previous page).
- 3.4. Disabling cookies may result in the inability to access the parts of the Site that require authorization.
- 3.5. The Site collects statistics about the IP addresses of its visitors. This information is used to identify and solve technical problems.
- 3.6. Any other personal information not mentioned above (browsing history, browsers and operating systems used, etc.) is to be securely stored and not disclosed, except as provided in this Privacy Policy.
- 3.7. The Site uses Yandex.Metrica Service provided by YANDEX LLC, located at 16 Lva Tolstogo Street, 119021 Moscow, Russia, (hereinafter "Yandex").

Yandex.Metrica Service utilises cookies, which are small text files stored on the User's computer, to analyse their activity on the Site.

The information collected by these cookies cannot identify the User, but it can assist in improving the operation of the Site. The information about the User's activities on the Site, collected by cookies, is transmitted to a Yandex server in the EU and the Russian Federation and stored there. Yandex will process this information to analyse the User's activities on the Site, generate reports on the Site's operation, and provide other services. Yandex processes this information in accordance with the Terms of Use of Yandex.Metrica service and AppMetrica.

The User has the right to refuse the use of cookies by adjusting the corresponding settings in the browser. The User can also utilise the tool — <a href="https://yandex.ru/support/metrika/general/opt-out.html">https://yandex.ru/support/metrika/general/opt-out.html</a>. However, please note that this may impact the functionality of certain features on the Site. By using this Site, the User agrees to the processing of their data by Yandex as specified above.

3.8. The Site uses Google Analytics by Google Inc., located at 1600, Amphitheatre Parkway, Mountain View, CA 94043, USA (hereinafter - "Google"). The service provides universal analytical functions which allow for data, sessions, and interactions across multiple devices to be assigned to a pseudonymous user ID, enabling analysis of the User's activities on all devices. Google Analytics also utilises cookies to analyse the User's activity on the Site.

The information about the User's activities on the Site collected by cookies is transmitted to a Google server in the USA and stored there. On this website, Google Analytics has been enhanced by IP anonymization to ensure anonymous registration of IP addresses (known as IP address masking). This means that Google shortens the User's IP address in advance, but only within member states of the European Union or in other countries participating in the Agreement on the European Economic Area. Only in exceptional cases will the full IP address be transmitted to and shortened by a Google's server in the USA. The IP address provided by the User's browser for Google Analytics will not be merged with other data collected by Google. Google uses this information to analyse the User's activities on the Site,

generate reports on the Site's operation, and provide other services to the Site's Owner related to the use of the Site and the Internet.

The User has the right to refuse the use of cookies by adjusting the corresponding settings in the browser. However, please note that this may impact the functionality of certain features on the Site. The User can also opt out from having their data (including IP address) collected and processed by Google by downloading and installing the browser add-on available at

https://tools.google.com/dlpage/gaoptout?hl=en-GB. Opting out of cookies prevents the collection of User's data during any future visits to the Site. To prevent data collection via Universal Analytics on multiple devices, the User is to opt out of all systems used.

The Site's Owner uses Google Analytics for the purposes specified in this Privacy Policy.

4. Purposes of collecting personal data

The User's personal data may be used by the Site's Administration for the following purposes:

- 4.1. Identification of the User upon their registration on the Site in order to obtain access to the Site's services;
- 4.2. Providing the User with access to the personalised resources of the Site;
- 4.3. Establishing feedback with the User, including sending notifications, requests related to the use of the Site and access to the services, processing requests and applications from the User;
- 4.4. Determining the location of the User to ensure security, fraud prevention;
- 4.5. Confirmation of the accuracy and completeness of personal data provided by the User;
- 4.6. Providing the User with effective customer and technical support in case of problems related to the use of the Site;

- 4.7. Providing the User, with their consent, with special offers, newsletters and other information on behalf of the Site or on behalf of the Site's partners;
- 4.8. Implementation of advertising activities with the User's consent.
  - 5. Methods and Terms of personal data processing
- 5.1. The User's personal data processing is carried out without any time limitations, by any lawful means, including in personal data information systems using automation tools or without the use of such tools.
- 5.2. The User agrees that the Site's Administration has the right to transfer personal data to third parties, in particular, courier services, postal organizations, telecommunications operators, solely for the purpose of providing the User with the services ordered on the Site.
- 5.3. The User's personal data may be transferred to authorized state authorities of the Russian Federation only on the grounds and in the manner established by the legislation of the Russian Federation, as well as for the purpose of protecting the rights and legitimate interests of the Site's Owner in court.
- 5.4. In the event of loss or disclosure of personal data, the Site's Administration informs the User about the loss or disclosure of personal data.
- 5.5. The Site's Administration takes necessary 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 unlawful actions of third parties.
- 5.6. The Site's Administration, together with the User, takes all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the User's personal data.
  - Obligations
- 6.1. The User undertakes to:
- 6.1.1. Not provide knowingly false information.

- 6.2. The Site's Administration undertakes to:
- 6.2.1. Use received information exclusively for the purposes specified in this Privacy Policy;
- 6.2.2. Ensure that confidential information is kept secret and not disclose it without the User's prior consent, as well as not sell, exchange, publish, or disclose the received User's personal data in any other possible way, except as provided in Clauses 5.2. and 5.3. of this Privacy Policy:
- 6.2.3. Take precautionary measures to protect the confidentiality of the User's personal data in accordance with the procedure commonly used to protect such information in existing business practices.
- 6.2.4. Block personal data related to the respective User from the moment of the request or inquiry by the User, their legal representative or an authorized body for protection of the rights of personal data subjects for the verification period, in case of revealing false personal data or unlawful actions.

### 7. Liability

- 7.1. The Site's Administration that fails to fulfil its obligations is liable for the losses incurred by the User due to the unlawful use of personal data, in accordance with the legislation of the Russian Federation, except for the cases provided for in Clauses 5.2., 5.3., and 7.2. of this Privacy Policy.
- 7.2. In the event of loss or disclosure of Confidential Information, the Site's Owner is not responsible if such confidential information:
- 7.2.1. Became publicly available before its loss or disclosure by the Site's Owner;
- 7.2.2. Was received from a third party before it was received by the Site's Administration;
- 7.2.3. Was disclosed with the consent of the User.
  - 8. Dispute resolution

- 8.1. Prior to filing a lawsuit regarding disputes arising from the relations between the User and the Site's Owner, it is mandatory to submit a claim (a written proposal for a voluntary settlement of the dispute).
- 8.2. The recipient of the claim shall inform the claimant in writing of the results of the claim consideration within 30 calendar days from the date of receiving the claim.
- 8.3. In case of failure to reach an agreement, the dispute will be referred to a court at the Site's Owner location in accordance with the current legislation of the Russian Federation.
- 8.4. This Privacy Policy and the relations between the User and the Site's Administration are governed by the current legislation of the Russian Federation.
  - 9. Additional terms
- 9.1. The Site's Administration has the right to modify this Privacy Policy without the consent of the User.
- 9.2. The new Privacy Policy comes into effect from the moment it is posted on the Site, unless otherwise provided by the new edition of the Privacy Policy.
- 9.3. The current Privacy Policy is posted at <a href="https://widgenta.com/policy.">https://widgenta.com/policy.</a>