

Privacy and Personal Data Processing Policy

Moscow

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This Privacy and Personal Data Processing Policy applies to any and all information that the website of **OOO Russian Translation Company** (hereinafter referred to as **OOO RPK**), hosted under the domain name **https://rpk.group**, may obtain about the User while he/she is using the website, software and services offered by the website.

1. TERMS AND DEFINITIONS

1.1. This Privacy and Personal Data Protection Policy contains the following terms:

1.1.1. "Website Administration" refers to the employees authorized to manage the website and acting on behalf of OOO RPK who initiate or implement the processing of Personal Data and define the purpose of Personal Data processing, including the list of Personal Data to be processed and the operations to be performed.

1.1.2. "Personal Data" refers to any and all information related to an individual who is or may be directly or indirectly identified (Personal Data subject).

1.1.3. "Personal Data Processing" refers to any action (operation) or combination of actions (operations) with Personal Data performed with or without the use of automation tools, including but not limited to the collection, recording, systematization, accumulation, storage, adjustment (update, change), extraction, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion and destruction of Personal Data.

1.1.4. "Personal Data Privacy" refers to the requirement to prevent the dissemination of Personal Data without the consent of the Personal Data subject or other legal ground that is binding for the Website Administration or any other person that has obtained access to such Personal Data.

1.1.5. "Website User" (hereinafter referred to as the "User") refers to a person who has access to the website and uses it via the Internet.

1.1.6. "Cookies" are a small piece of data sent by the server, stored on the User's computer and sent back to the server with an HTTP request by the web client or web browser each time the respective website is accessed.

1.1.7. "IP address" is a unique address of a node within a computer network based on the IP protocol.

2. GENERAL PROVISIONS

2.1. By using the website, the User agrees to this Privacy and Personal Data Processing Policy and the terms and conditions of the User's Personal Data processing in accordance with his/her activities on the website.

2.2. In the event that the User disagrees with the terms and conditions of this Privacy and Personal Data Processing Policy, he/she shall discontinue using the website.

2.3. This Privacy and Personal Data Processing Policy only applies to the OOO RPK website. OOO RPK does not control, nor is responsible for, the websites of any third parties that the User may access via the links on the OOO RPK website.

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

3. SCOPE OF THE PRIVACY AND PERSONAL DATA PROCESSING POLICY

3.1. This Privacy and Personal Data Processing Policy sets forth the responsibility of the Website Administration for the non-disclosure and confidentiality of the Personal Data provided by the User at the request of the Website Administration upon registration on the website or when placing an order for a service.

3.2. Personal Data that may be processed under this Privacy and Personal Data Processing Policy is provided by the User when he/she fills in a contact form on the OOO RPK website and include the following:

3.2.1. The User's name

3.2.2. The User's phone number

3.2.3. The User's e-mail address.

3.3. The website protects data that is automatically transmitted while viewing advertisements and visiting webpages with a web statistical script ("pixel"), namely:

- IP address.
- Data extracted from Cookies.
- Information about the browser (or any other software that provides access to advertisements).
- Time of access.
- Address of web page with an advertisement.
- Referrer (address of the previous page).

3.3.1. Disabling Cookies may close access to those parts of the website that require authorization.

3.3.2. The website collects statistical data on the IP addresses of its visitors. The data is used to identify and solve technical failures and to ensure the lawfulness of payments.

3.4. Any other personal information that is not listed above (history of orders, browsers and operating systems used, etc.) is subject to appropriate storage and non-dissemination, except for the cases provided for in clauses 5.2 and 5.3 of this Privacy and Personal Data Processing Policy.

4. PURPOSE OF COLLECTING PERSONAL INFORMATION ABOUT THE USER

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

4.1.1. To identify the User for the purpose of placing an order and (or) concluding a contract with OOO RPK.

- 4.1.2. To provide the User with access to customized resources of the website.
- 4.1.3. To establish a connection with the User, including by sending notifications and requests concerning the use of the website, the provision of services, and the processing of requests and orders placed by the User.
- 4.1.4. To determine the User's location for safety purposes and to prevent fraud.
- 4.1.5. To verify the reliability and completeness of Personal Data provided by the User.
- 4.1.6. To create an account for making purchases (subject to the User giving his/her consent to create an account).
- 4.1.7. To notify the User on the status of his/her order.
- 4.1.8. To process and receive payments, confirm tax or tax benefits, dispute payments.
- 4.1.9. To provide the User with effective customer and technical support in case there is an issue related to the use of the website.
- 4.1.10. To provide the User (subject to his/her consent) with special offers, price lists, newsletters or other information on behalf of the website or the website's partners.
- 4.1.11. To place advertisements subject to the User's consent.
- 4.1.12. To provide the User with access to websites or services of the website's partners for the purpose of receiving products, updates and services.

5. METHODS AND TIMEFRAMES OF PERSONAL DATA PROCESSING

- 5.1. The processing of the User's Personal Data is performed without any legal time restrictions, including in Personal Data information systems that may or may not use automation tools. Personal Data is stored as long as is necessary for the purpose of its processing.
- 5.2. The User agrees that the Website Administration may transfer Personal Data to third parties, including delivery companies, postal organizations, telecom operators, solely for the purpose of fulfilling orders placed by the User on the website.
- 5.3. The User's Personal Data may be transferred to the authorities of the Russian Federation only on the grounds and in the manner established by the law of the Russian Federation.
- 5.4. In case of loss or disclosure of Personal Data, the Website Administration shall inform the User of such loss or disclosure.
- 5.5. The Website Administration shall take the necessary administrative and technical measures to protect the User's Personal Data from unlawful or accidental access, destruction, modification, blocking, copying, dissemination or other unlawful actions by third parties.
- 5.6. Together with the User, the Website Administration shall take all the necessary precautions to prevent financial losses, or any other negative consequences caused by the loss or disclosure of the User's Personal Data.
- 5.7. Documents containing the Personal Data of Personal Data subjects that no longer have to be stored according to rules and regulations are subject to destruction. Digital Personal Data shall be deleted from the storage media, or the media containing such data shall be physically destroyed.

6. OBLIGATIONS OF THE PARTIES

6.1. The User shall:

6.1.1. Provide reliable Personal Data that is necessary to use the website.

6.1.2. Update and (or) complete the Personal Data provided earlier in case such data has changed.

6.2. The User may:

6.2.1. Request full information on their Personal Data, its processing, use and storage.

6.3. The Website Administration shall:

6.3.1. Take precautions to keep the User's Personal Data confidential.

6.3.2. Block the Personal Data of a User in the event that such data is found to be unreliable, or if any unlawful actions have been committed, from the moment such User or his/her representative or a competent authority protecting the rights of Personal Data subjects sends a request or appeal, for the duration of verification.

6.3.3. Use the information it receives solely for the purposes set forth in Clause 4 of this Privacy and Personal Data Processing Policy. The Administration shall not request that the Personal Data subject provide Personal Data that would be excessive for the purposes of processing pursued by OOO RPK.

6.3.4. Keep sensitive information confidential, refrain from disclosing it without a preliminary written consent of the User and from selling, exchanging, publishing or disclosing the User's Personal Data by any other means, except as set forth in clauses 5.2 and 5.3 of this Privacy and Personal Data Processing Policy.

6.3.5. Inform the Personal Data subject about the purposes, intended sources and means of obtaining Personal Data, as well as about the nature of the Personal Data to be obtained and the consequences of refusing to grant written consent to obtaining such data.

6.3.6. Obtain the User's consent to the processing of their Personal Data, unless the law enables it to process Personal Data without consent. The User may revoke his/her consent to the processing of their Personal Data at any time. To do so, they need to send a written notice of revocation to the address of OOO RPK. In the event that consent to the processing of Personal Data is revoked, OOO RPK may continue processing such Personal Data without the User's consent provided that it has grounds to do so as specified in clauses 2–11, part 1 of article 6, part 2 of article 10, and part 2 of article 11 of Federal Law No. 152-FZ dated 27 July 2006.

7. TRANSFER AND DISSEMINATION OF PERSONAL DATA

7.1. OOO RPK may transfer Personal Data to third parties provided that the Personal Data subject gives his/her consent to such transfer in written or digital form.

7.2. OOO RPK may transfer information contained in Personal Data without consent if such transfer is requested by the government authorities in the manner established by law.

7.3. OOO RPK shall not transfer Personal Data to any third parties without the consent of the Personal Data subject to the transfer of such data.

7.4. Consent to the processing of Personal Data that the Personal Data subject allows to be disseminated among third parties is given separately from other consents to process Personal Data given by the Personal Data subject.

7.5. If it does not follow from the consent provided by the Personal Data subject to disseminate Personal Data that he/she agrees to the dissemination of his/her Personal Data, OOO RPK shall process such Personal Data without disseminating it.

7.6. If it does not follow from the consent provided by the Personal Data subject to transfer Personal Data that he/she has not established any limits and conditions for the processing of his/her Personal Data or has not identified the list and categories of Personal Data to be processed under such limits and conditions established by the Personal Data subject, OOO RPK shall process such Personal Data without transferring (disseminating, providing, giving access to) such Data to the general public.

7.7. Consent to the dissemination of Personal Data may be given by the User to OOO RPK:

- Directly
- Via the information system of an authority protecting the rights of Personal Data subjects.

7.8. When giving consent to Personal Data processing, the Personal Data subject may establish a prohibition for OOO RPK to transfer (other than by providing access) such Personal Data to the general public, or set other restrictions or conditions for the processing of such data (other than by obtaining access). OOO RPK cannot deny the Personal Data subject the right to establish such prohibitions and conditions.

7.9. Within three (3) business days of the date that the consent of a Personal Data subject to disseminate such Data is received, OOO RPK shall publish information about the terms of processing, as well as about any prohibitions and conditions for the processing of Data intended for dissemination to the general public.

7.10. The transfer (dissemination, provision, access) of Personal Data allowed for dissemination by the Personal Data subject shall be discontinued at any time at his/her request. Such request shall include the first name, last name, patronymic (if any), contact details (phone number, email or postal address) of the subject and the list of Personal Data that will no longer be subject to processing.

7.11. Consent to dissemination given by the Personal Data subject shall remain in effect until OOO RPK receives the relevant request provided for in Clause 7.10 of this Privacy and Personal Data Processing Policy.

7.12. The Personal Data subject has the right to request that the transfer of (dissemination of, provision of, access to) Personal Data that he/she had previously given consent to be disseminated be terminated in the event of non-compliance with Federal Law No. 152-FZ dated 27 July 2006, or file such a request with the court. OOO RPK or a third party shall discontinue the transfer (dissemination, provision, access) of Personal Data within three (3) business days upon receipt of such a request or by the date indicated in a court decision that has come into effect. If no such date is indicated in the court decision, OOO RPK or the third party shall discontinue the transfer of Personal Data within three (3) business days from the date the court decision comes into effect.

8. LIABILITY OF THE PARTIES AND GUARANTEES OF PERSONAL DATA PRIVACY

8.1. Failure by the Website Administration to fulfil its obligations will result in it being liable for any losses incurred by the User due to inappropriate use of his/her Personal Data in accordance with the law of the Russian Federation, except for cases provided for in clauses 5.2 and 5.3 of this Privacy and Personal Data Processing Policy.

8.2. In case of loss or disclosure of confidential information the Website Administration shall not be held liable if such confidential information:

8.2.1. became public knowledge prior to its loss or disclosure

8.2.2. was obtained from a third party before it was obtained by the Website Administration

8.2.3. was disclosed with the User's consent.

8.3. The Personal Data of a Personal Data subject is for internal use only and protected by law.

8.4. Persons responsible for non-compliance with the regulations governing the receipt, processing and protection of Personal Data are subject to disciplinary, administrative, civil or criminal action in accordance with the law.

9. DISPUTE RESOLUTION

9.1. A claim (written proposal to settle a dispute amicably) is a mandatory step that must be taken before going to court with a dispute that has arisen between the User and the Website Administration.

9.2. The party in receipt of the claim shall notify the claimant of its decision regarding the claim within 30 calendar days.

9.3. If the parties fail to reach an agreement, the dispute shall be handed over to a court in accordance with the current law of the Russian Federation.

9.4. This Privacy and Personal Data Processing Policy and the relations between the User and the Website Administration shall be governed by the law of the Russian Federation.

10. MISCELLANEOUS

10.1. The Website Administration may amend this Privacy and Personal Data Processing Policy without the User's consent.

10.2. An amended Privacy and Personal Data Processing Policy shall come into effect as soon as it is posted on the information website unless otherwise indicated in the amended Privacy and Personal Data Processing Policy.

10.3. Any and all suggestions or queries regarding this Privacy and Personal Data Processing Policy shall be sent via email to info@rpk.group

10.4. The current version of Privacy and Personal Data Processing Policy is posted at: https://rpk.group/docs/rpk_policy_en.pdf.