

# **Personal Data Processing Policy**

## **1. General provisions**

- 1.1. This Personal Data Processing Policy (hereinafter, the “Policy”), adopted by AKVION CAPITAL RUS OOO (OGRN 1157746562160; INN 7701355237; registered address: 12, Presnenskaya embankment, room 5/1H/68, Moscow, 123112, Russia) (hereinafter, “AKVION CAPITAL RUS”), specifies the main principles, purposes, methods and terms of processing the website Visitors’ personal data, measures to ensure the security and protection of personal data.
- 1.2. This Policy has been developed in accordance with the requirements of the Constitution of the Russian Federation, of legislative acts and other regulations of the Russian Federation concerning personal data, and has been published on AKVION CAPITAL RUS’s website [akvioncapital.ru](http://akvioncapital.ru) (hereinafter, the “Website”) for unlimited access.
- 1.3. The terms used in this Policy shall be construed in accordance with their definitions in the Federal Law of the Russian Federation No. 152-FL *On Personal Data*, dated 27 July 2006.
- 1.4. AKVION CAPITAL RUS warrants that it shall, subject to the provisions hereof, respect the confidentiality of the personal data received and shall only use the same for the purposes set forth herein.

## **2. Concept and composition of personal data**

- 2.1. A list of the personal data to be protected by AKVION CAPITAL RUS is compiled in accordance with the Federal Law of the Russian Federation No. 152-Φ3 *On Personal Data*, dated 27 July 2006.
- 2.2. AKVION CAPITAL RUS will process and protect the personal data (including the surname, name, contact number, email address etc.) of the Website Visitors, as well as the personal data submitted to AKVION CAPITAL RUS’s corporate email address ending in [@akvioncr.ru](mailto:@akvioncr.ru) (hereinafter, the “Corporate Email”), of the subjects who have expressed Consent for the Processing of Personal Data (hereinafter, the “Consent”) by submitting information via selected forms (hereinafter, the “Forms”) found on the Website pages or by sending an email. The moment of accepting the Consent shall be the moment of checking the Form’s appropriate field and clicking the Form’s submit button on any page of the Website, as well as clicking the button to send an email containing the subject’s personal data to the Corporate Email address.
- 2.3. While browsing AKVION CAPITAL RUS’s Website, reading texts, and downloading other information, certain data about the computer the Website Visitor uses to browse AKVION CAPITAL RUS’s Website are being automatically recorded. When one is browsing the Website, AKVION CAPITAL RUS collects the following information:
  - the date and time of accessing the Website;
  - the number of visited pages, the titles thereof, as well as the duration of browsing;
  - the IP address assigned to one’s device for the purpose of connecting to the Internet;
  - the browser and operating system type;
  - the referral URL of the website from which one has been redirected.

## **3. Purposes of personal data processing**

- 3.1. The processing of the Website Visitors’ personal data shall be conducted for such purposes as:
  - sending reference and marketing information to the Website Visitors by sending emails to the email address provided by the Website Visitors;
  - providing the Visitors with an opportunity to give AKVION CAPITAL RUS their feedback;

- advising the Website Visitors on matters relating to the services provided, for purposes of conducting marketing activities and providing support to the Website Visitors, as well as for other purposes not inconsistent with the current legislation of the Russian Federation and with the terms of agreements between AKVION CAPITAL RUS and the corresponding Website Visitors.

#### **4. Principles and terms of personal data processing**

- 4.1. Personal data processing by AKVION CAPITAL RUS shall be based on the following principles:
  - legality and the equitable basis principle;
  - limitation of processing to achieving specific, predetermined and legitimate purposes;
  - exclusion of the personal data processing incompatible with the purposes of personal data collection;
  - exclusion of the merging of databases containing personal data processed for purposes incompatible with each other;
  - the content and scope of the personal data being processed must be consistent with the stated purposes of such processing;
  - personal data must be stored in a form that allows the identification of the data subject for no longer than is necessary for the purposes of personal data processing unless the personal data retention period is set in a federal law or an agreement to which the data subject is a party or under which the same is a beneficiary or guarantor;
  - other principles provided by the current legislation of the Russian Federation on personal data.
- 4.2. AKVION CAPITAL RUS will process personal data if at least one of the following conditions is met:
  - the data subject has given their Consent for the processing of personal data;
  - personal data processing is necessary to exercise the rights and to pursue the legitimate interests of AKVION CAPITAL RUS, to achieve the goals of public significance, provided the rights and freedoms of the data subject are not thereby violated;
  - personal data processing is conducted for statistical or other research purposes, provided the personal data must be rendered anonymous;
  - other conditions provided by the current legislation of the Russian Federation on personal data.

#### **5. Rights and duties**

- 5.1. The data subject shall have the right to:
  - demand that their personal data be rectified, updated, blocked, or erased;
  - obtain a list of their personal data being processed by AKVION CAPITAL RUS, the source thereof, information on the period of processing of their personal data, including the period of retention of their personal data, and other information regarding the processing of their personal data;
  - demand that all persons to whom their inaccurate or incomplete personal data had been previously communicated be notified of all amendments or supplements thereto;
  - file, in accordance with an established procedure, complaints about any wrongful acts or omissions committed while processing their personal data.
- 5.2. The Website Visitors shall only provide accurate data about themselves.
- 5.3. The Visitor shall grant the Consent for the processing of personal data for an entire period necessary for AKVION CAPITAL RUS to achieve the purposes of the processing.
- 5.4. The Consent for the processing of personal data may be revoked by the Visitor by sending a written request to AKVION CAPITAL RUS's address: 12, Presnenskaya embankment, Tower «A» (East), Moscow, 123112, Russia, or to the Corporate Email address ([corp@akvioncapital.ru](mailto:corp@akvioncapital.ru)).

- 5.5. Persons who have submitted to AKVION CAPITAL RUS, via the Website, another subject's personal data without the consent of the subject whose personal data have been submitted will be liable under the legislation of the Russian Federation.
- 5.6. AKVION CAPITAL RUS shall never request that the Website Visitors provide information regarding their racial, national identity, political views, religious and philosophical convictions.
- 5.7. In processing personal data, AKVION CAPITAL RUS may collect, record, arrange, accumulate, store, rectify (update, alter), retrieve, use, transfer (distribute, provide, access), anonymise, block, delete, erase the Visitor's personal data.
- 5.8. If Visitors participate in events organised by AKVION CAPITAL RUS, the latter may provide the relevant personal data of the Visitors to persons involved in the organisation of the event.
- 5.9. AKVION CAPITAL RUS may not provide the Website Visitors' personal data to a third party, except for the following persons:
  - competent public authorities, within their competence;
  - persons to which AKVION CAPITAL RUS must provide the same for the purposes of compliance with the legislation of the Russian Federation;
  - persons to which AKVION CAPITAL RUS provides personal data for the purposes of carrying out a contract with the data subject;
  - persons which AKVION CAPITAL RUS commissions to process personal data;
  - AKVION CAPITAL RUS's assigns, in the case of its reorganisation;
  - other persons, subject to the data subject's consent.
- 5.10. AKVION CAPITAL RUS may not disclose the Website Visitor's personal data for commercial purposes without their consent. The Visitor's personal data processing for the purposes of marketing products, works, services by directly contacting a potential customer using communication facilities is permissible only with the Visitor's prior consent.
- 5.11. AKVION CAPITAL RUS shall warn the persons that received the Visitor's personal data that the data may only be used for purposes for which they have been communicated and shall demand that the persons confirm the observance of this rule.
- 5.12. The persons that received the Visitor's personal data must keep them secret (confidential).
- 5.13. AKVION CAPITAL RUS shall process and implement measures for the protection of the Website Visitors' personal data in accordance with the provisions hereof as well as other documents prepared by AKVION CAPITAL RUS.

## **6. Ensuring personal data protection and security**

- 6.1. AKVION CAPITAL RUS implements appropriate standards of technical and operational security to protect the information provided by the Website Visitors against unauthorised access, disclosure, alteration, blocking, and erasure.
- 6.2. The measures implemented by AKVION CAPITAL RUS include:
  - appointment of a person responsible for the organisation of personal data processing;
  - implementation of legal, technical and organisational measures for ensuring the security of personal data;
  - assessment of damage the data subject may suffer in the case of failure to comply with legislative requirements, of a relation between damage and the measures implemented by AKVION CAPITAL RUS;
  - use of secure areas with access partitioning to house personal data information system servers, as well as the use of locked cabinets to store hard copies of personal data;
  - familiarisation of AKVION CAPITAL RUS's employees directly engaged in personal data processing with the provisions of the legislation of the Russian Federation on personal data;
  - control over the implemented measures for ensuring the security of personal data.

- 6.3. Access to personal data shall only be provided to the authorised employees of AKVION CAPITAL RUS who have undertaken to maintain the confidentiality of such information.

## **7. Personal data storage**

- 7.1. The Website Visitors' personal data shall be stored for a period necessary for the purposes for which the data have been provided and for a period provided by the legislation.
- 7.2. Upon the achievement of the purposes/elapsed of the personal data processing period, the Website Visitors' personal data shall be erased.

## **8. Final provisions**

- 8.1. AKVION CAPITAL RUS's Website collects the standard session-log information, including IP address, browser type and language, as well as the data on the time of access and referral website addresses. To ensure effective management of the Website and to facilitate user-interface customisation, AKVION CAPITAL RUS may use cookies (small text files stored in a visitor's browser) or web beacons (electronic images) together with tracking pixels, which allow the Website to calculate the number of visitors to a certain page and to ensure access to certain cookie files.
- 8.2. The standard information collected will only be used for statistical purposes. AKVION CAPITAL RUS does not use personal data to personally identify any of the Visitors. However, during the Website authorisation of registered Visitors, AKVION CAPITAL RUS may use that information, together with the data obtained through data analytics tools and cookie files, in order to analyse how the visitors are using the Website.
- 8.3. By using the Website, the Visitor grants their consent to akvioncapital.ru's placement of cookies on the Visitor's device in accordance with the above terms.
- 8.4. The Visitors can control cookies through browser settings. If cookies are deleted, all data about the Visitor's preferences, including their preference to opt out of the use of cookies, will be deleted. If cookies are blocked, this change may affect the user interface, and some elements of the Website may become inaccessible.
- This Policy shall be subject to change and supplementation should the appropriate changes and supplements be introduced into the current legislation of the Russian Federation on personal data, and may also be changed at any time at AKVION CAPITAL RUS's discretion. The current revision of this Policy of AKVION CAPITAL RUS's is always available for unlimited public access on the Website.
- 8.5. All relations involving AKVION CAPITAL RUS, pertaining to the processing and protection of personal data, and not directly reflected in this Policy shall be governed by the provisions of the current legislation of the Russian Federation on personal data.
- 8.6. The person responsible for the organisation of personal data processing by AKVION CAPITAL RUS shall oversee the compliance with the requirements of this Policy.