

PRIVACY POLICY

This Privacy Policy (the “Policy”) applies to all information that LLC “Stattech” (“STAT-TECH”) may obtain about a user when the user accesses the website at stattech.ru (the “Website”) or uses the services of LLC “Stattech” (the “Services”). This Policy explains how LLC “Stattech” collects, uses, and protects your information. Its purpose is to ensure that information about users, including their personal data, is adequately protected against unauthorized access and disclosure. The collection, storage, distribution, and protection of information about Website users are governed by this Policy, other official documents issued by the Website Administration, and the applicable laws of the Russian Federation. By using the Services, the User unconditionally accepts this Policy and the personal information processing terms set out herein. If the User does not agree to these terms, the User must refrain from using the Services. This Policy forms an integral part of the Public Offer Agreement available at <https://stattech.ru/docs/offer-en.pdf>.

1. General Provisions

- 1.1. By using the Website or any of its Services, you accept this Privacy Policy. This Policy applies only to user information obtained through the Website and its Services. STATTECH does not control and is not responsible for the processing of information by third-party websites that the User may access through links available on the Website, including links appearing in search results.
- 1.2. This Policy establishes the rules for collecting, processing, storing, and using personal information provided by Website users.
- 1.3. This Policy applies to:
 - 1.3.1. standard data automatically received by the HTTP server when the Website is accessed, including the host IP address, the requested resource, the date and time of the request, the type of browser and other browser information, the User's operating system, and the address of the page from which the User accessed the Website;
 - 1.3.2. data provided by the User when registering on the Website, including the User's last name, first name, email address, and other information;
 - 1.3.3. information automatically received when the Website is accessed using cookies;
 - 1.3.4. data provided by the User when paying for Services under the Public Offer Agreement;
 - 1.3.5. other non-public data provided by the User for the purpose of receiving the Services.

2. Website Access Terms

- 2.1. When providing access to the Website and its Services (the "Website Services"), the Website Administration, acting reasonably and in good faith, assumes that the User:
 - 2.1.1. has all rights and legal capacity required to register on and use the Website;
 - 2.1.2. provides accurate information about themselves to the extent required to use the Website Services;
 - 2.1.3. understands that information posted by the User about themselves on the Website, as well as information provided by the User to STATTECH for publication on other websites, may become available to other Website users and Internet users and may be copied and distributed by them;
 - 2.1.4. has knowingly configured and controls the settings of the software they use in accordance with their preferences regarding the protection of personal data and information about their hardware, software, and Internet connection;
 - 2.1.5. can review this Policy by following the "Privacy Policy" hyperlink available on the relevant Website page at <https://stattech.ru/docs/privacy-policy-en.pdf>.

2.2. The Administration considers that any user who accesses the Website has reviewed this Policy and agrees to it.

2.3. If the User does not agree to this Policy, the User must stop using the Website.

3. Purposes of Information Processing

3.1. The Website Administration processes information about users, including their personal data, in order to perform its obligations to users in connection with their use of the Website and its Services.

4. Collection of User Information

4.1. The Website collects user information for the purposes set out in this Policy. The Administration does not intend to collect information from minors and recommends that their legal representatives allow them to use the Internet only under appropriate supervision.

4.2. The Administration does not verify the accuracy of information collected about users and does not assess users' legal capacity.

5. Processing of User Information

5.1. Personal data is processed in accordance with the following principles:

5.1.1. the purposes and methods of personal data processing must be lawful;

5.1.2. processing must be carried out in good faith;

5.1.3. the purposes of processing must correspond to the purposes predetermined and stated when the personal data was collected and to the powers of the Website Administration;

5.1.4. the scope and nature of the personal data processed and the methods used to process it must correspond to the stated purposes of processing;

5.1.5. databases containing personal data and created for incompatible purposes must not be combined.

5.2. Personal data processing terms and purposes. The Website Administration processes the User's personal data for the purpose of performing the Public Offer Agreement between LLC "Stattech" and the User (Customer). Pursuant to Article 6 of Federal Law No. 152-FZ dated July 27, 2006, "On Personal Data," separate consent from the User is not required where personal data is processed for this purpose. Pursuant to Article 22(2)(2) of that Federal Law, the Website Administration may process personal data without notifying the authority responsible for protecting the rights of personal data subjects.

5.3. Collection of personal data. The User's personal data is collected when the User registers on the Website and subsequently when the User voluntarily provides additional information about themselves using the Website's functionality.

- 5.4. Storage and use of personal data. Users' personal data is stored exclusively in electronic form and processed using automated systems, except where non-automated processing is required in order to comply with applicable law.
- 5.5. Transfer of personal data. Users' personal data is not transferred to third parties except as expressly provided in this Policy. At the User's direction or with the User's consent, personal data may be transferred to contractors of the Website Administration, provided that those contractors undertake to protect the confidentiality of the information received.
- 5.6. Personal data may be disclosed at the request of state authorities or local self-government bodies in accordance with the procedure established by law.
- 5.7. Destruction of personal data. The User's personal data is destroyed:
 - 5.7.1. when the User independently deletes the data from their personal page;
 - 5.7.2. when the Administration deletes information posted by the User or deletes the User's personal page in the cases specified in the Terms of Use of the Website and its Services.

6. Information Storage and Protection

- 6.1. Information about users is stored on the Website in accordance with the purposes set out in this Policy.
- 6.2. All information about users collected, stored, and processed by the Website is treated as restricted-access information unless otherwise provided by the laws of the Russian Federation or this Policy.
- 6.3. The Administration takes all reasonable measures to protect user information against destruction, alteration, or disclosure.
- 6.4. In addition to the Administration, the following persons may access user information:
 - 6.4.1. Website users, to the extent that the information identifies them;
 - 6.4.2. persons and organizations that support the services and systems of LLC "Stattech," to the extent required to provide such support.
- 6.5. LLC "Stattech" may share information with joint ventures or other companies under common control. Such information may be used to provide joint services and for purposes including internal statistics, strategic decision-making, customer trend analysis, customer verification, fraud prevention, and security.

7. Use of User Information

- 7.1. The Administration guarantees the following User rights:
 - 7.1.1. the right to obtain information as to whether the Website stores information that identifies the User;

- 7.1.2. the right to request deletion of stored personal data;
- 7.1.3. the right to request correction or updating of stored personal data. Personal data will be deleted within 30 (thirty) calendar days after the relevant request is received. Deletion may make certain Website Services unavailable. The User may distribute their own personal data by any lawful means. The Administration is not responsible for the actions of third parties that obtain access to user information as a result of such distribution or through unlawful access to protected user information.
- 7.2. Information about users is distributed through the Website only in the following cases:
 - 7.2.1. after the relevant information has been depersonalized so that it no longer identifies the User and has undergone statistical processing;
 - 7.2.2. with the permission of persons who provided information intended for public display when registering on the Website;
 - 7.2.3. where information is provided to the persons specified in the “Information Storage and Protection” section.
- 7.3. Information contained in user profiles, including login credentials, email addresses, and passwords, is used solely to authorize access to the Website and the Services.
- 7.4. The User is responsible for safeguarding this information. Any action performed using it is deemed to have been performed by the User.
- 7.5. The Website Administration does not use other information from user profiles to send information to users except where such use is provided for in the terms governing the Services or expressly requested by the User.

8. Scope Limitations

- 8.1. This Policy does not apply to the actions or websites of third parties or to information provided by the User to LLC “Stattech” for publication on other websites.
- 8.2. The Website Administration is not responsible for the actions of third parties that obtain access to information about the User through the Internet or the Website Services in accordance with the privacy settings selected by the User, or for the consequences of using information that, by the nature of the Website, is available to any Internet user.
- 8.3. The Website Administration recommends that users carefully consider the amount of information about themselves that they post on the Website.

9. Final Provisions

- 9.1. The Administration reviews inquiries relating to this Policy, including requests from users concerning the use of their personal data, at info@mail.stattech.ru. All correspondence sent by users to the Website Administration is treated as restricted-access information and may be published only with the User’s written consent.

Email addresses, personal data, and other information about users who send such correspondence may not be used without their specific consent except for the purpose of responding to the relevant inquiry.

- 9.2. This Policy is an open and publicly available document.
- 9.3. The current version of this Policy is published online at the permanent address <https://stattech.ru/docs/privacy-policy-en.pdf>.
- 9.4. The Administration reserves the right to amend this Policy by providing notice at the address where the Policy is published.