

199004, St Petersburg, 5 Linia V.O., bld.54, letter A, office 57, T: +7 (812) 335 20 15, FAX: +7 (812) 335 20 13, E-MAIL: <u>OFFICE@KRUGOZOR-EXPO.RU</u> TIN 7801532680 • CRR 780101001 • No. 40702810526000762401 AT PJSC "PROMSVYAZBANK", BRANCH IN ST-PETERSBURG • RCBIC 044030920 • correspondent account 3010181000000000920

Confidentiality policy

Company – Limited Liability Company "Krugozor Expo Travel", PSRN 1107847372687, TIN 7801532680, address: 199004, St Petersburg, 5 Linia V.O., bld.54, letter A, office 57 (hereinafter the Company)

Website – Internet resource which represents a collection of information and intellectual property items contained in the information system (including a computer program, database, the graphic design of the interface (design), etc.), access to which is provided from various user devices, connected to the Internet, through a special software program for browsing web pages (browser) at: www.krugozor-expo.ru (including domains and subdomains belonging to these addresses).

User – visitor to the Internet resources, including the Site.

The Company ensures the protection of your personal data when using the Site and the services of the Site.

The Company recognises the importance of personal privacy and information security on the Internet and respects these principles.

This confidentiality policy applies only to customers of the Company and Users of the Site and the Company's services in accordance with the current legislation of the Russian Federation, including Federal Law of the Russian Federation "On Personal Data" No. 152-FZ of 27 July 2006 (hereinafter the Personal Data Act).

This confidentiality policy is posted on the Site and is applied when the User uses the Company's Site, along with the User Agreement also posted on the Company's Site.

Full and unconditional acceptance and confirmation of familiarity with the Company's Confidentiality Policy is completed by the User through actions intended for using the Site, including: registration on the site, sending messages through the form of communication and other actions to use the functionality of the Site.

This Confidentiality Policy can be changed by the Company at any time without any special notification of this to the User. The new version of the confidentiality policy shall enter into force from the moment of its posting on the Site, unless the Company expressly specifies otherwise. Regular familiarisation with the current version of the Confidentiality Policy is the responsibility of the User.

Use of the Site after the coming into force of the new version of the confidentiality policy means the User agrees with it and fully applies the provisions of the new version.

The current version of this Confidentiality Policy is available at: 199004, St Petersburg, 5 Linia V.O., bld.54, letter A, office 57.

Personal data and other data



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Personal and other information about the User: User's surname, first name, patronymic or pseudonym, e-mail address, mobile phone number, as well as any other information provided by the User, including that contained in messages sent to other Users through the feedback form in the Site interface, information about the User's actions on the Site and other information provided by the User when using the Site, including when registering on the Site, while exchanging information, feedback, and using the services of the Company. The Company has the right to collect certain personal data from publicly available sources of information, as permitted by the legislation of the Russian Federation.

Personal data is provided voluntarily in the manner and form established by the Company for using the services of the Site.

Data which is transmitted in automatic mode:

• IP, cookies, options and settings of Internet browsers, the User's location, his/her actions, etc. Unlike personal data, such information is depersonalised, and therefore does not come under the composition of personal data.

Use of personal data

The Company uses personal data provided by the User for the purposes of technical administration of web pages and fulfilment of the wishes and requests of Users, first of all, for the fulfilment of the terms of contracts with User-counteragents of the Company or in response to requests from Users.

The availability of personal data helps the Company improve the services offered by the Company, and to provide user-friendly and functional use of the Site and its services.

Personal data is used by the Company for the purposes of:

- Execution of the contract concluded by the Company (its partners, sub-executors) and whose party or beneficiary or guarantor is the personal data subject, as well as for the conclusion of the contract on the initiative of the subject of the personal data or contract whereby the personal data subject is the beneficiary or guarantor, including when: performing work, using the site, contacting customer support, providing services;
- Promotion of the Company's works and services on the market through direct contacts with the potential consumer through communication means, including: conducting research, marketing activities;
- Feedback from the Company to customers and users of the site, including when providing services, performing work, using the site, when contacting customer support;
- Provision of consulting support to Users in connection with use of the Site;
- Obtaining statistical and analytical data to improve the functioning of the Site and/or Services;
- Expanding the range of services provided by the Company's Website;
- Improving the quality and expanding the list of the Company's Services;
- Provision of consulting support to Users in connection with their use of the Site;



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- Dissemination of information and/or advertising communications of the Company or third parties, including those related to the Company's services;
- Preventing or suppressing unlawful and/or unauthorised actions of Users or third parties, ensuring compliance with the requirements of the current legislation of the Russian Federation.

To achieve these goals, the Company carries out actions including but not limited to the following:

- Creation of a personal office on the Site and its management;
- Processing of your orders;
- Sending texts and electronic messages;
- Communication with the User in the event of problems arising with the provision of services by the Company related to the use of the Site;
- Providing answers to inquiries and informing about new or amended services;
- Sending marketing offers in the form of newsletters;
- Notification of the winners of competitions, promotions and events;
- Conducting analyses to provide marketing proposals and information;
- Distribution of questionnaires or posting them on the website, designed to provide an opportunity to influence the quality of the Company's services;
- Testing and improvement of the Company's systems and service provision technologies;
- Prevention of improper or inappropriate use of the Company's services.

The Company carries out the processing of personal data as long as it is necessary to achieve the above goals, or as long as this is required by law.

Transfer of personal data

The Company does not transfer personal data to third parties, does not sell or distribute it in any way, except for cases when it is required by law, to execute a contract* concluded with a personal data subject or his/her representative, or if the consent of the personal data subject to these activities is explicitly received.

* For example, when ordering a service from the Company, it may be necessary to transfer the client's personal data to a sub-executor, a partner in Russia and other countries for the performance of the contract with the Company.

User rights

The User has the right at any time to request for free information about what personal data the Company has about him/her.

At any time, the User has the right to request correction or deletion of information. There is a possibility that the Company will not be able to completely delete personal data if it contradicts the statutory requirement for their storage, for example, for accounting purposes, or if there are other legal grounds for storing this data, for example, outstanding debts.

The User may at any time withdraw his/her consent to the use of personal data for marketing purposes.



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Withdrawal of consent to the use of personal data is carried out by the User in the form established on the Company's Site.

You can contact the Company by sending a letter to the Company's support service at the following address: 199004, St Petersburg, 5 Linia V.O., bld.54, letter A, office 57 or by sending an e-mail to the address: office@krugozor-expo.ru.

Ensuring the protection of personal data

The Company has taken technical and organisational measures to protect personal data from loss, fraudulent actions and unauthorised access.

The Company constantly ensures that the security measures used correspond to the latest technological achievements and developments.

In certain cases, personal data is encrypted during transmission using Secure Socket Layer (SSL) technology. That is, to transfer information between the User's computer (mobile device) and the Company's servers, an approved SSL encryption procedure is used if the User's browser supports it.

If you wish to contact the Company by e-mail, the Company makes it clear that the confidentiality of information sent in this way is not guaranteed. The content of emails can be acquired by third parties, therefore it is recommended to send confidential information only by ordinary mail.

Using cookies

"Cookies" are small files that allow specific information to be stored about the User's computer and about the User when the User visits the Site.

The Company uses cookies to improve and simplify the process of using the Site. The Company does not use cookies to store personal information or disclose information to third parties.

Links

The Site may contain links to sites whose activities are not under the Company's control.

The Company is not responsible for the content of these sites and the protection of data confidentiality when using these sites, but the Company provides links to them so that Site Users can find additional information on certain topics.