

Privacy Policy

Effective: May 25, 2018.

CSSSR is a software development company that creates interfaces and web-applications (see “Who We Are”). We are concerned about privacy issues and want you to be familiar with how we collect, use, and share information and how you can exercise the privacy rights available to you. This Privacy Policy describes how we collect and use information when visitors interact with or use any of the CSSSR Properties (such as our “Website”).

If you are resident in the European Economic Area and want to find out more about your data protection rights, please see “Your Data Protection Rights”.

If you have any questions, you may contact us (see “Contacting Us”).

A reference to “CSSSR”, “we” or “our” means Company Name Ltd.

CSSSR also collects information from individuals when they visit, use, or interact with: (i) www.csssr.com and other websites operated by us, including our software applications (the “Apps”); (ii) our social media pages (our “Social Media Pages”).

1. WHAT INFORMATION DO WE COLLECT?

Information that individuals provide voluntarily

Certain parts of the CSSSR Properties may ask visitors to provide personal information voluntarily: for example, we may collect personal information when a visitor sends email message, expresses an interest in obtaining additional information about CSSSR or our products and services, subscribes to our marketing newsletters, or otherwise contacts us.

The personal information we collect may include contact information (such as name, address, telephone number, or email address) and contact preferences. It may also include professional information, such as job title, department or job role, and the nature of an individual’s request or communication. We also collect information that visitors choose to provide to us when completing any ‘free text’ boxes in our forms (for example, for event sign-up, product feedback, or survey requests). Please do not post any information that you do not want to reveal to the public at large.

Information we collect automatically

When an individual uses CSSSR Properties, we may automatically collect certain information from the individual’s device. In some countries, including countries in the EU, this information may be considered as personal data under applicable data protection laws.

Specifically, the information we collect automatically may include IP address, operating system type and version, browser type and version, cookie ID, an individual's activities on the CSSSR Properties, and other information about the individual's system and connection and how the individual interacts with the CSSSR Properties and other websites. We and our third-party partners may collect this information as a part of log files and through the use of cookies or other tracking technologies, as explained further under the heading "Cookies and Similar Tracking Technology".

2. HOW DO WE USE YOUR INFORMATION?

We may use information collected from the CSSSR Properties for the following purposes:

- **To send administrative information.** For example, to send information regarding our services and changes to our terms, conditions, and policies.
- **To engage in and process transactions.** For example, we may use personal information to process your transactions and for billing purposes.
- **Interest-based advertising and analytics.** We may partner with certain third parties to collect information on the CSSSR Properties to engage in analysis, auditing, research, and reporting, as well as to deliver advertising that we believe may interest you based on your activity on the CSSSR Properties and other websites over time. These third parties may set and access cookies on your computer or other device and may also use pixel tags, web logs, web beacons, or other similar technologies.
- **To select content and improve quality.** We may use information to help improve the CSSSR Properties and to ensure that content on the CSSSR Properties is presented in the most effective manner for your device.
- **For legal purposes.** We may use information as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with subpoenas, warrants, or other legal processes; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations or those of any of our affiliates; (f) to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.
- **For our business purposes.** We may use information for our business purposes, such as data analysis, audits, identifying usage trends, determining the effectiveness of our promotional campaigns, and to evaluate and improve our products, services, marketing, and client relationships.

3. COOKIES AND SIMILAR TRACKING TECHNOLOGIES

We may use cookies and similar tracking technologies on the CSSSR Properties to collect and use information about you. For further information about the types of cookies and other tracking technologies we use, why, and how you can control cookies, please see our Website Cookie Policy.

4. USE OF CSSSR PROPERTIES BY MINORS

The CSSSR Properties are not intended for nor directed to individuals that are deemed to be children under applicable data protection or privacy laws, and we request that such individuals do not provide information through any of the CSSSR Properties.

5. HOW DO WE SHARE YOUR INFORMATION?

Information collected from CSSSR Properties may be disclosed:

- **To our vendors, consultants, and other service providers:** We may share your information with our third-party service providers, vendors, contractors, or agents who perform functions required for the operation of the business. Examples include: to provide data storage and processing services, lead management, campaign management, technical support for our Platform and CSSSR Properties and fraud prevention.
- **To website advertising partners:** As noted above, we may partner with certain third parties to collect information on the CSSSR Properties to engage in analysis, auditing, research, and reporting, as well as to deliver advertising that we believe may interest you based on your activity on the CSSSR Properties and other websites over time. We may share information with them for this purpose.
- **For business transfers:** We may share your information with a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of our business, assets or sock (including in connection with any bankruptcy or similar proceedings).
- **For legal purposes:** We may share your information as we believe to be necessary or appropriate: (a) under applicable law, including laws outside your country of residence; (b) to comply with subpoenas, warrants, or other legal processes; (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence; (d) to enforce our terms and conditions; (e) to protect our operations; (f) to protect our rights, privacy, safety

or property, and/or that of our affiliates, you or others; and (g) to allow us to pursue available remedies or limit the damages that we may sustain.

- **With consent:** We may disclose an individual's information to any other person with the individual's consent to such disclosure.
- **On message boards or other public webpages:** Individuals may choose to share information on message boards, chats, profile pages and blogs and other services that allow visitors to post information and materials (including, without limitation, our Social Media Pages). Please note that any information posted or disclosed through these services and forums will become public information, and may be available to users of the CSSSR Properties and to the general public. We urge you to be very careful when deciding to disclose your personal information, or any other information, on the CSSSR Properties.

6.YOUR DATA PROTECTION RIGHTS

You have the following data protection rights:

- You have the right to request access to or that we change, update, or delete your personal information at any time.
- If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent.
- The right to opt out of receiving marketing newsletters from us.

If you are a resident of the European Economic Area (EEA), you also have the following rights:

- The right to object to processing of your personal information, restrict processing of your personal information, or request portability of your personal information. To exercise these rights email privacy@csssr.com; and
- The right to complain to a data protection authority about our collection and use of your personal information. For more information, please contact your local data protection authority.

Please note that because most of the information we store can only identify a particular browser or device, and cannot directly identify you personally, you may need to provide us with some additional information to enable us to identify the personal information we hold about you and ensure that we accurately fulfil your request and do not infringe on the privacy rights of other individuals.

You can exercise your rights at any time by contacting us at privacy@csssr.com.

7.LEGAL BASIS FOR PROCESSING PERSONAL INFORMATION (EEA END USERS AND VISITORS ONLY)

If you are a resident of the EEA, our legal basis for collecting and using personal information described above will depend on the personal information concerned and the specific context in which we collect it. However, we normally rely on our legitimate interests to collect personal information from you, except where such interests are overridden by your data protection interests or fundamental rights and freedoms. Where we rely on our legitimate interests to process your personal information, they include the interests described in the sections above with the heading “How Do We Use Your Information” for the CSSSR Properties.

In some cases, we may rely on your consent or have a legal obligation to collect personal information from you or may otherwise need the personal information to protect your vital interests or those of another person. If we rely on consent to collect and/or process your personal information, we will obtain such consent in compliance with applicable laws.

If you have questions about or need further information concerning the legal basis on which we collect and use your personal information, please contact us using the contact details provided under the “Contacting Us” heading below.

8.THIRD PARTIES

This Policy does not address, and we are not responsible for the privacy, information, or other practices of any third parties (including, without limitation, our vendors) operating any site or service to which the CSSSR Properties contain a link. The inclusion of a link through the Online Property does not imply endorsement of the linked site or service by us.

Please note that we are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organizations, such as Facebook, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any personal information you disclose to other organizations through or in connection with the CSSSR Properties.

You should always read the privacy policy of any website you access or social network page through which you share information carefully in order to understand their specific privacy and information usage practices.

9. HOW DO WE KEEP YOUR PERSONAL INFORMATION SECURE?

We use reasonable organizational, technical, administrative, and physical safeguards to protect the personal information we collect and process. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal information and to help ensure that your data is safe and secure. However, no electronic transmission over the Internet or information storage technology can be guaranteed to be 100% secure. If you have a reason to believe that your interaction with us is no longer secure, please immediately notify us of the problem by contacting us in accordance with the “Contacting Us” section below.

10. RETENTION OF YOUR INFORMATION

We will retain personal information for the period necessary to fulfill the purposes outlined in this Policy and where we have ongoing legitimate business needs to do so (for example, to comply with applicable legal, tax or accounting requirements, to enforce our agreements or comply with our legal obligations) unless a longer retention period is required or permitted by law.

We use precise geolocation for our specific website to which the geolocation relates, after which the geolocation information is aggregated with other geolocation data for use by us for analytical purposes.

If we are required to retain information to comply with a legal or audit obligation, we may store End User information for longer periods.

11. INTERNATIONAL DATA TRANSFERS

The CSSSR Properties are provided, supported, and hosted in Russian Federation. If you are using these from outside Russian Federation, be aware that your information may be transferred to, stored, and processed by us in our facilities and by those third parties with whom we may share your personal information, in Russian Federation.

However, we have taken appropriate safeguards to ensure that your personal information will remain protected in accordance with this Policy. We specifically implement the European Commission’s Standard Contractual Clauses for transfers of personal information between our group companies, which require all group companies to protect personal information they process from the EEA in accordance with European Union data protection law. Our Standard Contractual Clauses can be provided upon request. We have implemented similar appropriate safeguards with our third-party service providers and partners and further details can be provided upon request.

12. SENSITIVE INFORMATION

We ask that you not send us, and you not disclose, any sensitive personal information (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, criminal background, or trade union membership) on or through the CSSSR Properties or otherwise to us.

13. UPDATES TO THIS POLICY

We will review and update this Policy periodically and will note the date of its most recent revision at the top of this Policy. If we make material changes to this Policy, we will post the revised Policy on our website and may take additional measures to inform you about such changes if required by applicable data protection laws. We encourage you to review this Policy frequently to be informed of how CSSSR is protecting your information.

14. CONTACTING US

If you have any questions about this Policy or CSSSR's privacy practices, please contact us by email at privacy@csssr.com, or by mail using the details provided below.

Please note that email communications are not always secure, so please do not include sensitive information in your emails to us.

Company Name Ltd,

ul. Letnikovskaya, d. 2, c 3., a/ya № 33

Moscow, Russia, 115114

To comply with our obligations under EU data protection legislation, we have appointed a Data Protection Officer (DPO). Our DPO is contactable at privacy@csssr.com or by mail using the details provided above.

Who is the controller of my data? For the purposes of EU data protection legislation, Company Name Ltd is the controller of your personal information.