

Privacy Policy

The Privacy Policy specified how your personal information, gathered when you visit <http://the-point.ru/> (Website), is collected, stored and processed. Please read this Privacy Policy carefully. This will help you to make conscious decisions when it comes to disclosing personal information when you use the Website.

1. Agreement with the Privacy Policy

Your visiting the Website means your unconditional agreement with this Privacy Policy and the terms and conditions stipulated herein as regards the processing of your personal information. If you do not agree with these terms and conditions, you must refrain from using the Website.

2. Intellectual property and usage rights

We inform you and you agree that the Website is our intellectual property and is managed by us. Information, graphic, audio, photo and other means of filling the Website and the materials that are placed on the Website are our intellectual property or the property of right holders, who have granted us the right to place these materials on the Website.

All intellectual property rights, including copyright, associated, exclusive rights to corporate names, trade names, trademarks, service marks or other intellectual rights in all materials or content of the Website belong to us or to our partners.

The Website and the materials on it are designed exclusively for your non-commercial use. Any other use of the Website or the materials on it is prohibited without our prior written permission. You agree not to perform any, all or several of such actions as copying, reproduction, transfer, distribution, sale, commercial use, amendment, reprocessing or creation of derivative materials from the materials and the content of the Website. Performance of such actions as pertaining to the Website and its materials is unlawful and may be entail liability pursuant to governing law.

3. Governing law

When contacting our Website, you accept that all issues, associated with visits to and use of the Website, including compliance with this Privacy Policy, are regulated in accordance with Russian law. When handling your personal data we are guided by the provisions of Federal Law No. 152-FZ dated July 27, 2006 «On personal data».

4. Personal information

The information that we collect about you depends on how you use the opportunities that our Website provides.

We can obtain the following personal information:

- Personal information that correlates with you as an individual, including your personal data such as your name, e-mail address, telephone number and other detailed information that you volunteer about yourself when you register on the Website or when you use the Services, send us a letter or agree to receive electronic messages from our Website or upon other interaction with us. Personal information that is mandatory for the provision of the Services shall be highlighted in a particular way. You may provide other information as you see fit. You are not obliged to provide us your personal information. Nevertheless, if you prefer not to provide this information, it is possible you may not be able to visit all pages of the Website or use all of the Services;

- Data that are automatically transferred to the Website when it is used with the help of software that is installed on your user device, including your IP address, geographic location, information about your browser or other program, with which you access the Website, the technical characteristics of the equipment and software that you use as a user, the date and duration of use of the Website, the pages you view, the website address from which you arrived at our Website, details of cookies files and other such information that does not enable us to identify you.

We do not check the veracity of the personal information you provide. However, we proceed from the fact that when you use our Website, you provide reliable and sufficient information and that you keep such information up to date. You hereby represent and warrant that, in respect of any personal data that you provide on the Website, you hold the right and the authority to provide these personal data for the purposes as specified in this Privacy Policy.

5. Purposes of processing personal information

We collect and store only the personal information that is required to use our Website and the Services provided to you, and for pursuing any other lawful objective, as specified in this Privacy Policy.

We process the collected personal information for the following purposes:

- To identify, authorize and authenticate you as a user of our Website;
- To provide you with personalized Services;
- To communicate with you, including the sending of notices and information that relates to the Services or on amendments to our policies, and to process your inquiries and applications;
- To inform you about our products and services or about the products and services of our partners or to provide you with information, allowing for your actions on the Website that we believe will be of particular interest to you. You also allow us to take your individual preferences into account and to provide you with a higher level of service. In particular, we may send you invitations to attend presentations and other events that we hold individually or in collaboration with our partners.
- To target advertising;
- To evaluate, optimize, and improve the quality of the Website, the Services and the convenience of their use, in accordance with your preferences;
- To perform statistic and similar research based on anonymous or depersonalized information; • For recognition, study, and prevention of actions that may violate our policies or be unlawful.

From time to time we may also invite you to provide personal information in the form of questionnaires or surveys, your participation in which is purely voluntary. The personal information that is received from such questionnaires or surveys is used to inform you of the results of the questionnaires or surveys and to improve the way the Website is used or to enhance satisfaction with the Services.

6. Conditions governing the processing of personal information and its transfer to others

We preserve the confidentiality of your personal information.

We will not transfer your personal details to others, except for in a limited number of circumstances, including the following:

- When your personal information is provided to other persons, with whom we work as partners, including in connection with your use of a specific Service, to contractors, whose services we use to operate or for the operation of the Website, or if the transfer of your personal information occurs within our sale, cession or other transfer of the Website's business, either fully or partially. In this instance we will require that these persons handle your personal information in accordance with this Privacy Policy;
- When the transfer of personal information is stipulated under governing law as part of a legally established procedure or pursuant to a judicial decision;
- When it is necessary to facilitate the protection our rights and other lawful interests, and the rights and lawful interests of other persons or users, upon the violation of our policies or agreements;
- When, as a result of the processing of your personal information, depersonalized statistical data are received, which are transferred to another person to perform research, conduct work or render services at our behest.

7. Processing personal information using cookies and counters

We use cookies as a basis for interacting with your Internet browser, for the automatic collection of personal information.

Cookies are a small portion of text information that our Website passes to your browser, while the browser stores and transfers it back to the Website on each occasion that you make an inquiry to the Website. Certain values of cookies may be stored only for a single session when you are on the Website and shall be deleted once you close the browser. Others, set for a certain period of time, shall be recorded in a special file and stored on your computer.

Cookies contain information that enables the Website to identify your browser when you contact the Website and visit pages of the Website. We use cookies to collect such information as the time you spend on the Website, the area of the Website you

visit, websites with links to and from our Website, and other, additional, information. The structure of a cookie, its contents and technical parameters are determined by the Website and may be amended without us sending you prior notice. Such cookies do not allow us to collect personal information about you.

The use of cookies is a standard practice. We apply cookies to remember users who visit our Website and to save their personal preferences and settings, to provide them personalized Services, for targeted advertising that is shown to users, for statistical and research purposes, for security, and to improve the Website and the Services based on user preferences.

Please note that the equipment and software that users use to visit Internet websites may prevent operations with cookies for any or for specific websites, and may delete previously received cookies. You can independently delete cookies that are saved on your computer at any time and amend the parameters in your browser settings so that the browser stops saving all cookies and notifies you that they have been sent. However, in this instance, certain functions of the Website and the Services may stop working, they may work more slowly or reflect only text-based information. We reserve the right to establish that the provision of a certain Service is possible only if the user has permitted the acceptance and receipt of cookies.

Our Website also contains counters, which are used to analyze users' cookies, to collect and process statistical information on the number of Website users, the use of Services and the popularity of service settings, the frequency of visits to pages of the Website, to monitor traffic, to evaluate the technical

capabilities of the Website, ensure the maximum possible compliance of the Website with the browsers used by users, and to ensure the operating capability of the Website and the Services as a whole or in terms of separate functions. The technical parameters of the work of counters are specified by the Website and may be amended without having to send you our prior notification.

8. Steps taken to protect personal information

We take the organizational and technical steps that we deem necessary and sufficient to ensure the protection of your personal information from unlawful or random access, destruction, blocking, copying, copying, distribution, and from other unlawful actions of other persons as regards your personal information. From time to time we shall review our procedures pertaining to the security of personal information and we shall select new technologies and methods that are suitable for this purpose. Nevertheless, even when using the most state-of-the-art technologies, no website can be completely secure. In those improbable instances when we believe that the security of the personal information we have received may not be observed, we may inform you of such a development of events. If such a notification is justified, we shall apply every effort to inform you of this effect as soon as possible, allowing for the given circumstances.

9. Links to other websites

This Privacy Policy is applicable only to this Website and shall not apply to any other websites, even if such websites contain a link to our Website or if there is a link to these websites on our Website. We may indicate links to other websites that we believe may be of interest to users of our Website. Nevertheless, we cannot guarantee a high standard of confidentiality provision on other websites, to which we furnish links, and we cannot be held liable for the privacy rules of such other websites. Please bear in mind that these websites may collect personal information of users and that they operate in accordance with their own privacy rules, which may differ from those specified in this Privacy Policy. We recommend that when you switch to other websites you should familiarize yourself with the privacy rules they contain, because as soon as you leave our Website, any personal information you provide is no longer controlled by us.

10. Amending the Privacy Policy

We reserve the right from time to time to amend this Privacy Policy in full or in part, in order to reflect new technologies, industry practices, statutory requirements, and for other purposes. We call on you to periodically re-read our Privacy Policy to ensure you are well informed about how we protect your personal information. If changes are made to the Privacy Policy, an updated version will be published on our Website, with an amended publication date. This is sufficient notification of amendments to the Privacy Policy and we are not obliged to furnish you with other notices of amendments. However, if we are talking about significant amendments, we will notify you, by placing a clear announcement on the Website about such amendments or by sending you a notification directly. Amendments to the Privacy Policy shall come into effect from the moment they are placed on the Website. Your continued use of this Website and access to it after the publication of amendments to the Privacy Policy means that you have accepted the terms and conditions of the Privacy Policy.

11. Giving feedback. Questions and suggestions

We welcome your comments on how the Website works, about our activity and our Privacy Policy. If you have any questions or suggestions, please contact us at isales@grandroyalsochi.ru