

# PRIVACY POLICY

## 1. General Provisions

1.1. This Privacy Policy (hereinafter, "Policy") was developed to inform users (visitors) (hereinafter, "Users") of <https://surfway.ru/> (hereinafter, "Site") about personal data of Users that may be obtained when they use the possibilities of the Site, and data processing method by the Operator (Sole Proprietor (IP) Drogaykin Denis Sergeevich, Taxpayer Identification Number (INN) 773171750210 / Primary State Registration Number of the Sole Proprietor (OGRNIP) 318774600320770). This Policy also specifies the purposes for which Users' personal data may be processed, and the main security measures Users must take to ensure that their personal information remains confidential. In this Policy, a User is a person who has access to the Site, as well as to goods and services that may be purchased on the Site via the Internet.

1.2. This Policy is applied only to the data collected by the Operator as a User accesses the Site.

1.3. The User's access of the Site means unconditionally agreement with the provisions of this Policy and the terms of processing of the User's personal data.

1.4. The Operator protects the personal data collected from Users of the Site.

## 2. Collected Data and Purposes of Its Use

2.1. Users' personal data is collected by the Operator only for the following purposes:

- to provide technical management of the Site as well to analyze and to improve its work;
- to inform Users about services and products from the Operator;
- to conclude, execute or terminate civil contracts/agreements
- for marketing purposes;
- for other purposes specified in this Policy or defined by the Legislation of the Russian Federation

2.2. The User's personal data may include full name, gender, passport data, registration address, email address, phone number, site access ID, information contained in the fields for entering when placing an order, etc., as well as automatically transmitted data to the Operator during the use of the Site, including, but not limited to: IP address, information about the device used to access the Site, etc..

When a User making payments for goods and services, money transfers, etc., the Operator collects data about the place, time, requisites and amount of transactions, the type of payment method, data about customers, a description of the reason for the transaction, if any, as well as other information related to the execution of the above operations.

2.3. When using User personal data, the Operator is guided by this Policy, the Privacy Policy for the processing of personal data, which is located at <https://surfway.ru/wp-content/uploads/files/policy-en.pdf> as well as by the legislation of the Russian Federation.

## 3. Timing and Methods of Personal Data Processing

3.1. Timing of personal data processing are defined with purposes of the processing and with legal requirements of the Russian Federation. Personal data is to be processed in any legal way, including in personal data information systems with or without automated tools.

3.2. The Operator has a right to transfer personal data of Users to its affiliates for providing services or for selling goods to Users. In all cases, such affiliates, including companies, shall follow to the provisions of this Policy.

3.3. The Operator shall not transfer personal data of Users to companies and individuals, not affiliated with the Operator, except following cases:

- a User has expressed a consent to such transfer;
- under and in accordance with the procedure established by the legislation of the Russian Federation, including for the purpose of:
  - execution of judgement or legal requirements of state authorities;
  - to detect, stop or prevent in any way fraudulent activities, as well as to eliminate technical failures or security problems;

3.4. The Operator may transfer aggregated depersonalized data of Users to its partners, such as media publishers, advertisers, etc. (for example, for statistical or other research).

3.5. To protect Users' personal data against unauthorized or accidental access, destruction, alteration, locking, copying, distribution, and against all other unlawful activities of third parties. Including but not limited, the Operator improves permanently methods of data collection, storage and processing, among them physical protective measures to prevent unauthorized access to the Site for theft, phishing, and other types of fraud.

#### 4. Updates to the Policy

4.1. The Operator has a right to make amendments in this Policy without consent of a User.

4.2. New version of the Policy is effective from the moment of its publishing on the Site.