

Publication date: 01.08.2020

This document *Privacy Policy* (hereinafter referred to as the Policy) constitutes the rules for the use of the User's personal information by SKB EP Limited Liability Company (hereinafter referred to as the Operator).

Herewith, the Operator and all persons being members of the same group as the Operator may receive this information during the use of any Operator's websites, tools, applications, features, programs, products or services (hereinafter referred to as the Website) by the User and during the performance of any agreements and contracts concluded with the User by the Operator. The User's consent to the Policy, expressed in terms of relations with a person being a member of the same group as the Operator, applies to all other persons in the specified group.

Using the Website shall mean that the User unconditionally agrees to this Policy and the terms of processing of their personal information specified herein. **If you disagree with all of these terms, do not use our websites, mobile apps, or other products and services.**

## 1. GENERAL PROVISIONS

1.1 This Policy constitutes an integral part of the User Agreement (hereinafter referred to as the Agreement), posted and/or available on the Internet at [https://skbpribor.ru/upload/terms\\_of\\_use\\_eng.PDF](https://skbpribor.ru/upload/terms_of_use_eng.PDF), as well as other agreements concluded with the User when it is expressly provided for in their terms.

1.2 This Policy is compiled in accordance with Federal Law No. 152-Φ3 *on Personal Data* passed on 27.07.2006, as well as other legal acts of the Russian Federation in the field of protection and processing of personal data and applies to all personal data that the Operator may receive from the User during the Website use by the latter.

1.3 Consent for Personal Data processing remains in force indefinitely. Pursuant to Federal Law No. 152-Φ3 *on Personal Data* passed on 27.07.2006, you have the right to withdraw your consent to the personal data processing by sending a corresponding written request to the postal address of the Operator: 196140, Russia, Saint Petersburg, Shushary, Ul. Kokkolevkaia (Pulkovskoye), 1, letter A, room 42-H, but not less than sixty days (60) before the date of the personal data processing termination. Should the consent to the Personal Data processing be withdrawn, you agree that the purposes of the Personal Data processing specified in Section 3 hereof will not be achieved, as well as it will be impossible for you to use the Website.

1.4 This Privacy Policy applies only to the Website, Mobile apps, tools, programs, products and other services of the Operator. The Operator does not control and is not responsible for third-party Websites to which the User may go by clicking links available on the Operator's Websites.

1.5 **By entering into the Agreement, you freely, voluntarily and in your own interests give written consent to the following methods of processing your personal data:** Collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

## 2. PERSONAL INFORMATION

2.1. In this Policy, personal information (personal data) shall mean:

2.1.1. Information provided by the User independently upon registration (creating an account), secure authorization and/or upon the Website use, relating to the User as an individual. Mandatory information is marked in a special way. Other information is provided by the User at their discretion.

For instance, we collect information when you create an account and/or profile in the Personal Account/mobile app, fill out a form, provide us with your business card, participate in Operator contests, fill out surveys, subscribe newsletter, make purchases, communicate with us through third-party websites, request support, or otherwise communicate with us.

In addition, to get access to certain materials of the websites [skbpribor.ru](http://skbpribor.ru), [skbep.ru](http://skbep.ru), [skbep.com](http://skbep.com), [skbpribor.com](http://skbpribor.com), [скбэп.рф](http://скбэп.рф), [skbpribor.ru/lab](http://skbpribor.ru/lab), [skbep.com/lab](http://skbep.com/lab), [trade-in.skbpribor.ru](http://trade-in.skbpribor.ru), [miko-10.ru](http://miko-10.ru), [milliommetr.ru](http://milliommetr.ru), [milliommetr.com](http://milliommetr.com)., you must provide information that includes, but is not limited to: surname, name, patronymic, position, organization name, as well as email address and mobile/corporate phone number. If you are a user of equipment and accessories manufactured by SKB EP, you provide information about the device/instrument/equipment (for example, serial number and date of purchase), activation code, etc. Additional information (address of the organization, management level and department, as well as devices, apps and event venues that you might visit) is optional.

The right to access certain materials is granted only to owners of SKB EP devices. If you resell the SKB EP device/app or resign from the organization that owns the SKB EP device/app, you must inform us thereabout in a timely manner. The Operator reserves the right to disable your account on the portal if we become aware of such or similar status changes that mean that you no longer need access to useful materials or that this platform is not being used for business purposes.

2.1.2. Data transmitted automatically to the Website during its use by means of software installed on the User's device, including IP address, cookie data, browser information (or another program that allows access to the Website), technical characteristics of the hardware and software used by the User, date and time of access to the Website, addresses of the requested pages and other similar information.

2.1.3. Other information about the User, the processing of which is provided for by the terms of the Website use.

2.1.4. The Operator verifies the accuracy of the personal information provided by the User and has the ability to assess their legal capacity.

2.2. The personal data processing of in this Policy shall mean:

2.2.1. Any action (operation) or set of actions (operations) performed with or without the use of automation tools with the Personal Data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (provision, access), including cross-border transfer, depersonalization, blocking, deletion and destruction of the Personal Data.

2.3. When sending the Personal Data upon placing the Order and/or completing feedback forms and/or performing other actions related to the provision of your personal data to the Operator, you put a mark against the lines *I have read and agree with the Privacy Policy and User Agreement*, and so that freely, voluntarily and pursuing own benefit, you authorize the Operator to process your Personal Data, including surname, name, email address, phone number, shipping address and any other personal data provided by you.

### **3. PURPOSES OF COLLECTING THE USER'S PERSONAL INFORMATION**

3.1 The Operator collects and stores only the personal information required for the provision of services, promotional information or for the execution of agreements and contracts concluded with the User, save insofar the laws provide for mandatory storage of personal information within a statutory period.

3.2 The Operator processes the User's personal information for the purposes as follows:

3.2.1. Providing the User with access to personalized resources (websites, mobile apps or other services of the Operator).

3.2.2. Confirming the accuracy and completeness of personal data provided by the User.

3.2.3. Creating an account for making a purchase/placing an order, other functional use of the Website, if the User has agreed to create the account, as well as secure authorization of the User on the Website.

3.2.4. Placing Orders, concluding and executing contracts with you.

3.2.5. Providing feedback to the User, including, but not limited to sending notifications, requests related to the use of the Website, purchasing and using goods and services, processing User requests and claims.

3.2.6. Providing the User with effective customer and technical support in case of problems related to the use of the Website, as well as products and services.

3.2.7. Providing the Operator's informational materials, information about product updates, special offers, pricing information, newsletters and other data on behalf of the Operator or on behalf of the Operator's partners, if the User has agreed by ticking a box on the Website or in the Mobile app to receive the Operator's informational materials.

If the User wants to opt out of the Operator's mailing list, they shall independently click the link *unsubscribe from the mailing list* specified in the text of the messages sent, or notify the Operator of their disagreement to receive the Operator's emails.

3.2.8. Carrying out advertising activities and targeting of promotional materials.

3.2.9. Providing the User with links to the websites or services of the Operator's partners.

3.2.10. Conducting statistical and other research based on depersonalized data, including for the purpose of improving the quality of goods and services.

3.2.11. Ensuring the protection and security of personal data, including when investigating cyber attacks, fraud and other abuses;

3.2.12. For other purposes stipulated by the Russian legislation.

### **4. CONDITIONS FOR PROCESSING THE PERSONAL INFORMATION**

4.1. The User's personal data is processed without limitation as to time, in any legal way, including in personal data information systems using automation tools or without using such tools.

4.2. The User's personal information is kept confidential, except for cases when the User voluntarily provides information about themselves for general access to an unlimited number of persons.

4.3. The website has the right to transfer the User's personal information to third parties in the following circumstances:

- 4.3.1. The user has agreed to such actions;
  - 4.3.2. The transfer is required as part of the Website features and/or the specifics of the Service based thereon use by the User;
  - 4.3.3. The transfer is required for the functioning and operability of the Website;
  - 4.3.4. In order to ensure the Operator's or third-party rights and legitimate interests protection in cases where the User violates the Website User Agreement, this Policy, or documents containing the terms and conditions of use of specific services.
  - 4.3.5. The User's personal information processing by its depersonalization results in obtaining depersonalized statistical data to be transmitted to a third party for conducting research, performing work or providing services on behalf of the Website.
  - 4.3.6. In order to fulfill the User's order, in particular, by courier companies, postal organizations, and telecommunications operators.
  - 4.3.7. Authorized contractors of the Operator to provide technical support and other services in relation to the Website, applications and/or other products and services in connection with the need to maintain their normal functioning.
  - 4.3.8. The User's personal data may be transferred to authorized state authorities of the Russian Federation only on the grounds and in accordance with the procedure established by the Russian legislation.
- 4.4. By sending third-party personal data through the Website, the User confirms that the third parties agree to the processing of their personal data and are familiar with this document, including the provisions on the methods and purposes of processing personal data and the procedure for revoking consent to the processing of personal data. The User is responsible for the legality of third-party personal data transfer to the Operator and for any damage caused to third parties as a result of such transfer and subsequent processing of their personal data.
- 4.5. The Website is not intended to receive confidential User information, except for personal data to the extent provided for in this document. The Operator does not process special categories of personal data and biometric personal data sent through the Website. Save in respect of personal data, no User information provided through the Website, regardless of its form (text document, special categories of personal data, graphic image, question, suggestion, idea, comment or another type of information), will be considered confidential. Thus, the fact that the User sends such information through the Website gives the Operator the right to use it as publicly available, reproduce, publish, modify and transmit it to third parties, etc.

## **5. PROCESSING OF THE PERSONAL INFORMATION USING THIRD-PARTY STATISTICS COLLECTION SYSTEMS**

5.1. To improve the website, app or other products and services, anonymous statistics are collected using third-party statistical collection systems (hereinafter referred to as Statistical Collection Systems), including Google.Analytics and Yandex.Metrica. Based on developer's information, statistical systems collect depersonalized data on Website visits and Mobile app usage, such as the user's IP address, cookies, the Website page or Mobile app views, information about time spent on the Website or in the Mobile app, device information, user location, pages viewed, date and time of information fixation, search words used, and so on.

5.2. Before you start using the Website and Mobile app and/or other products and services, please get familiarized with:

The Google.Analytics statistics system privacy policy at <http://www.google.com/policies/privacy/>;

The Yandex.Metrika statistics system privacy policy at <https://yandex.ru/legal/confidential/>;

5.3. Yandex and Google have the right to establish that the provision of a particular tool or service is possible provided that the acceptance and receipt of cookies are allowed by the User.

5.4. The cookie structure, content and technical parameters are determined by the Website and may change without prior notice to the User.

**5.5. If you do not agree with the collection of statistics, please leave the Website immediately and cease to use the Mobile app.**

## **6. PERSONAL INFORMATION PROTECTION**

6.1. The Operator takes necessary and sufficient organizational and technical measures to protect the User's personal information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions therewith by third parties in accordance with the internal rules and regulations.

## **7. MODIFICATION OF THE PERSONAL INFORMATION**

7.1. The User may change (update, supplement) the personal information provided thereby or a part thereof at any time by contacting the Operator using the official contact details specified in Section 10 of this document or upon request in the Personal Account.

7.2. The rights provided for in Clause 7.1. of this Policy may be restricted in accordance with legal requirements. For instance, such restrictions may require the Website to retain information that the User has changed or deleted for a period established by law and to transmit such information to a government authority in accordance with a legally established procedure.

7.3. SKB EP synchronizes the entered data with the information stored in the database about previous interaction with you or your company and corrects or updates it if necessary.

## **8. MODIFICATION OF THE PRIVACY POLICY**

8.1. The Operator has the right to modify this Privacy Policy without the User's consent.

8.2. When making changes in the current version, the date of latest renewal is indicated. The new version of the Policy takes effect upon its placement unless otherwise provided for by the new version of the Policy.

## **9. DISPUTE SETTLEMENT PROCEDURE**

9.1. Before bringing a court action for disputes arising from the relationship between the website User and the Operator, it is binding to submit a claim (a written proposal for voluntary settlement).

9.2. Within 30 calendar days upon the claim receipt, the claimee shall provide the claimant with the written notification of the claim consideration results.

9.3. If the parties fail to agree, the dispute shall be settled by a judicial authority in accordance with the Russian legislation in force.

9.4. This Privacy Policy and the relationship between the User and the Operator are subject to the Russian legislation in force.

## **10. CONTACT DETAILS AND ADDITIONAL INFORMATION**

10.1. The User may provide the Operator with all offers, questions, requests and other appeals with respect to this Policy and the personal data use (via email: [skb@skbep.com](mailto:skb@skbep.com)/ postal address: 196140, Russia, Saint Petersburg, Shushary, Ul. Kokkolevkaia (Pulkovskoye), 1, letter A, room 42-H).

10.2. The current version of the Policy is available on the Operator's website at [https://skbpribor.ru/upload/privacy\\_policy\\_eng.PDF](https://skbpribor.ru/upload/privacy_policy_eng.PDF).