

User Personal Data Processing Policy

1. General. Rights and Duties of the Controller and the User

1.1. This Policy of SWTECNN Limited Liability Company (hereinafter referred to as the “Controller”, the “Company”, SWTECNN LLC), a legal entity registered under the laws of the Russian Federation, concerning the processing of personal data (hereinafter referred to as the “Policy”) has been developed to the satisfaction of para. 2, Part 1, art. 18.1 of Federal Law No. 152-FZ dated July 27, 2006 “On Personal Data” (hereinafter referred to as the “Personal Data Law”) to ensure the protection of the rights and freedoms of man and citizen when processing his/her personal data, including the protection of the right to personal and family privacy.

1.2. The Controller's Policy applies to all information that the Controller may obtain about users of the **swtec.group** website.

1.3. To the satisfaction of Part 2, art. 18.1 of the Personal Data Law, this Policy shall be published in the public domain in the Internet information and telecommunications network on the Controller’s website.

1.4. Basic terms used in the Policy:

website means a set of graphic and informational materials, as well as computer programs and databases, making them available on the Internet at the network address **swtec.group**;

user means any individual visiting the **swtec.group** website (data subject);

personal data means any information relating, directly or indirectly, to the User of the **swtec.group** website;

data controller (controller) means a government agency, a municipal authority, a legal or natural person independently or together with other persons organizing and/or performing the processing of personal data, defining the purposes of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data; within the scope of this Regulation, the controller is SWTECNN;

processing of personal data means any action (operation) or a set of actions (operations) with personal data performed with or without the use of automated means. Processing of personal data includes: collection, recording, systematization, accumulation, storage, rectification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction;

blocking of personal data means temporary termination of processing of personal data (except in cases where processing is necessary to rectify personal data);

destruction of personal data means actions that make it impossible to restore the content of personal data in the personal data information system, and/or as a result of which physical media bearing personal data are destroyed;

distribution of personal data means actions aimed at disclosing personal data to any number of unspecified persons;

depersonalization of personal data means actions resulting in the impossibility, without the use of additional information, to determine whether the personal data belongs to a particular User or person;

personal data information system means a set of information technologies and technical means contained in databases of personal data and providing for its processing.

1.5. Basic Rights and Duties of the Controller

1.5.1. The Controller may:

- 1) independently determine the composition and list of measures necessary and sufficient to ensure compliance with the obligations under the Personal Data Law;
- 2) entrust the processing of personal data to another person with the user's consent.

1.5.2. The Controller shall:

- 1) arrange for the processing of personal data in accordance with the requirements of the Personal Data Law;
- 2) respond to user requests and inquiries;
- 3) provide the authority responsible for protecting the rights of personal data subjects (the Federal Service for Supervision of Communications, Information Technology, and Mass Media (Roskomnadzor)) with the necessary information requested by that authority within 30 days from the date of receipt of such request.

1.6. Basic Rights of the User. The User may:

- 1) rectify the personal data provided if it is incomplete and/or incorrect;
- 2) know what information about the User is processed and stored by the Controller;

- 3) not provide or withdraw its consent to the processing of personal data with its subsequent deletion by the Controller;
- 4) receive information regarding the processing of your personal data;
- 5) file a claim with the Controller to object to the use of personal data;
- 6) require the Controller to rectify its personal data, block or destroy it;
- 7) appeal to the Federal Service for Supervision of Communications, Information Technology, and Mass Media (Roskomnadzor) or in court against wrongful actions or omissions of the Controller in processing its personal data.

2. Objectives of Personal Data Collection

2.1. Processing of personal data that is incompatible with the objectives of personal data collection shall not be allowed.

2.2. The Controller shall process personal data for the following purposes:

- Ensure compliance with the regulatory legal acts of the Russian Federation;
- Carry out a marketing analysis of user behavior on the website swtec.group;
- Gather information about user activities on the website swtec.group;
- Improve the quality of the website swtec.group;
- Help users navigate through the website swtec.group.

3. Legal Reasons for Personal Data Processing

3.1. The legal reasons for personal data processing include:

- Federal Law No. 152-FZ “On Personal Data” dated July 27, 2006 and other laws and regulations of the Russian Federation governing relations pertaining to the Controller’s activities and the processing of personal data;
- Regulation No. 2016/679 of the European Parliament and of the Council of the European Union on the Protection of Individuals with regard to the Processing of Personal Data and on the Free Movement of Such Data (General Data Protection Regulation) (“GDPR”) if the User is a subject of the European Union law;
- Consent of data subjects to the processing of their personal data.

3.2. The Controller shall only process the User's personal data if the User agrees with the disclaimer that the Controller places on the website swtec.group. By accepting the terms and conditions set forth in the disclaimer by checking the appropriate box in the disclaimer, the User expresses its clear and voluntary agreement to this Policy.

3.3. The Controller shall process anonymized data about the User if this is allowed in the User's browser settings (cookies are enabled).

4. Volume and Categories of Processed Personal Data, Categories of Data Subjects

4.1. The content and scope of personal data processed by the Controller shall be consistent with the stated processing purposes set forth in Section 2 of this Policy. Processed personal data must not be excessive in relation to the stated purposes.

4.2. In accordance with this Policy, the Controller shall process personal data of the following category of data subjects: users of the website swtec.group.

4.3. Personal data processed by the Controller shall include: cookies, information about the user's actions on the website, information about the user's equipment, date and time of the session processed by the Controller (including using the metric programs Yandex.Metrika, Google Analytics).

4.4. The www.swtec.group website may use cookies of the following types:

Essential cookies: these cookies are required for the Website to operate. They enable the User to navigate through the Website pages and use the Website functionality. Without them, the Website cannot operate properly.

Functional cookies: these cookies enable the Website to remember the parameters set by the User, which makes it possible to tailor the Website offerings to the individual needs of the User. These cookies do not track the User's visits to other Websites.

All of the above types of cookies can be permanent or temporary:

- permanent cookies are stored on the User's device for a certain period of time, until they expire (or until you delete them).

This enables the User, for example, to save language settings so as not to change them each time the User visits the Website;

- temporary or session cookies save the session ID temporarily while the User is on the Website and are removed when the User leaves the Website or become invalid at the end of the User's visit to the Website.

4.4. The tools Google Analytics and Yandex.Metrika do not identify individual users and do not link any IP address to other data. Reports provided by Google Analytics and Yandex.Metrika are used to analyze the traffic of swtec.group.

4.5. The Controller's Website User can disable cookies for the website on the browser settings page.

5. Procedures and Conditions for Personal Data Processing

5.2. Processing of personal data shall be carried out with the consent of data subjects.

5.3. The Controller shall carry out both automated and non-automated processing of personal data.

5.4. The Controller's employees, whose job duties include the processing of personal data, shall be allowed to process personal data.

5.5. Processing of personal data shall be carried out through:

- Collecting and processing anonymized user data (including cookies) using Internet statistical services (Yandex.Metrika and Google Analytics and others);

5.6. Disclosure to any third party and distribution of personal data without the consent of the user shall not be allowed, unless otherwise provided for by the Russian laws, this Personal Data Processing Policy or the Law of the European Union.

5.7. The Controller shall be entitled to transfer data to the following persons:

- Technical data may be transmitted to external websites when you click on their links on our website (for example, when you click on links to the Company's social media accounts);

- Service providers for web analysis and collection of statistics on website visits;

- Government authorities (including regulatory bodies, law enforcement agencies, executive and judicial authorities), in relation to which the Company is required to provide information in accordance with the applicable laws;

- to other third parties if you have consented to the transfer.

5.8. Transfer of personal data to agencies of inquiry, investigation and to authorized executive bodies shall be carried out in accordance with the requirements of the Russian legislation.

5.9. The Controller shall take the necessary legal, organizational and technical measures to protect personal data from unlawful or accidental access to it and from any unauthorized actions, including:

– Identify threats to the security of personal data during its processing;

– Adopt local normative acts and other documents regulating relations in the field of processing and protection of personal data;

– Appoint persons responsible for organizing the processing of personal data in structural subdivisions of the Controller;

– Create the necessary conditions for working with personal data;

– Arrange for the accounting of documents containing personal data;

– Organize work with information systems in which personal data are processed;

– Store personal data in conditions that ensure its safety and exclude unauthorized access to it;

– Ensure training for the Controller's employees who process personal data.

5.10. The period of processing, including storage, of personal data shall be five (5) years, or if there is no longer any need to achieve the objectives of personal data processing. The User may withdraw its consent to the processing of personal data at any time by sending a notice by e-mail to the Controller's e-mail address info@swtecnn.com marked "Withdrawal of consent to the processing of personal data".

5.11. Processing of personal data shall be carried out in the territory of the Russian Federation. If the User is a resident of a country other than the Russian Federation, in this case there will be a cross-border transfer of your personal data to the servers of our websites, i.e. the territory of the Russian Federation. The Controller shall not transfer users' personal data obtained using its own website to other countries.

6. Updating, Blocking and Destruction of Personal Data, Responding to User Requests

6.1. Evidence of personal data processing by the Controller, the reasons and objectives of processing, as well as other information specified in Part 7, art. 14 of the Personal Data Law, shall be provided by the Controller to the user or its representative on the basis of a written request. Such request may be sent in the form of an electronic document and signed with electronic signature in accordance with the laws of the Russian Federation. If the request of a data subject does not contain all the necessary information in accordance with the requirements of the Personal Data Law, or the data subject does not have the right to access the requested information, it shall be provided with a reasoned refusal.

6.2. In case of detecting inaccurate personal data at the request of a data subject or its representative, the Controller shall block the user's personal data and rectify it on the basis of submitted information or other documents within seven business days from the date of submission of such information and then unblock the personal data. A notice about the need to update personal data can be sent by the user to the Controller via e-mail to info@swtecmn.com marked "Updating of personal data".

6.3. If any unlawful processing of personal data is detected at the request of the user or its representative, the Controller shall destroy the unlawfully processed personal data from the moment the request is received.

6.4. When the objectives of personal data processing is achieved, as well as in the case of withdrawal of the user's consent to its processing, the personal data shall be destroyed, except in cases where the Controller is entitled to process data without the consent of the data subject on the grounds provided by law.