

## **PRIVACY POLICY WITH REGARD TO PERSONAL DATA PROCESSING (HEREINAFTER REFERRED TO AS THE POLICY)**

### **1. THE POLICY OBJECTIVE**

In this Policy we describe who, how and for what purpose processes the personal data which can be obtained from you during your use of sites [www.nexign.com](http://www.nexign.com) and other sites which contain the reference to this Policy (hereinafter referred to as the Sites), as well as what you have the right to in connection with processing of your personal data.

We have developed this Policy in accordance with the legislation of the Russian Federation. In addition, as an international company we also take into account conditions of other regulatory legal acts in the field of personal data protection, including the General Data Protection Regulation (GDPR).

Please note that use of any of the Sites may be subject to additional conditions, whereof it will be explicitly indicated on the Site.

The Policy may be translated into different languages. All the translations posted on the Sites shall be recognized as identical. Your acceptance of the Policy in one of the languages shall not require its acceptance in other languages.

If you do not agree with the terms of the Policy, please refrain from using the Sites. However, if you continue using the Site, some features of the Site may be unavailable to you.

### **2. WHO PROCESSES THE INFORMATION**

The personal data operator (controller) within the meaning of the applicable law shall be:

Nexign, Joint Stock Company (abbreviated name Nexign, JSC), a legal entity established under the laws of the Russian Federation and registered at: 4, Lit B, Office 19H, Uralskaya St., St. Petersburg, Russia 199155 (the "Company").

### **3. THE BASIS ON WHICH THE INFORMATION IS PROCESSED**

We neither collect nor process personal data without sufficient legal grounds thereto.

The legal basis for collection and processing of your personal data shall be your consent to the processing of personal data, as well as whether we have a reasonable legitimate interest or the need to comply with the obligations established by applicable law.

### **4. WHAT INFORMATION IS COLLECTED AND PROCESSED**

While you use the Sites, we may collect the following information about you:

- Electronic data, such as HTTP headers, IP address, cookies (see section 11 below), browser ID, information about the hardware and software used;
- date and time of your use of the Sites;
- information about your activity while using the Sites;
- your geolocation data.

In some sections of the Sites, we may request additional information from you (last name, first name, name of the company you represent, scope of work, email or phone number).

### **5. WHAT IS THE INFORMATION USED FOR**

We process personal data strictly in accordance with applicable law and the purposes for which the data is collected.

Personal data are used by us in order:

- to give you access to the Sites, as well as to the closed sections of the website which require registration;

- to improve, maintain, upgrade, enhance usability of the Sites;
- to send you notices, requests and information relating to the Sites operation and processing of your requests and applications;
- to protect against copyright infringement, fraud and other misconduct;
- to collect and process statistical data.

## 6. HOW IS THE INFORMATION PROTECTED

We take serious legal, technical and organizational measures to ensure the security of personal data during their processing.

### In particular:

- The person responsible for organizing the personal data processing has been appointed;
- The local acts on the personal data processing issues have been approved. They establish procedures for prevention and detection of violations, consequences elimination of such violations;
- Sufficient technical and organizational measures have been introduced to protect personal data against unauthorized, accidental or unlawful destruction, loss, alteration, unfair use, disclosure or access, as well as other illegal forms of processing. These security measures are implemented taking into account current level of technology, cost of their implementation, the risks associated with processing and nature of personal data;
- Periodic checks of the personal data processing conditions are carried out;
- The Company employees, who directly process personal data, are familiarized with the provisions of personal data legislation, including personal data protection requirements, documents and other internal documents regarding personal data processing.

### The Company processes personal data in accordance with the following principles:

- Processing of personal data is carried out in a lawful and fair manner;
- Processing of personal data is limited to the achievement of specific, predetermined and legitimate goals. Processing of personal data that are incompatible with the purposes of collecting personal data is not allowed;
- It is not allowed to merge databases containing the personal data which are processed for the purposes incompatible with each other;
- Only the personal data meeting the purposes of processing thereof are subject to processing;
- The content and volume of personal data processed shall be in accordance with the stated processing purposes. The processed personal data shall not be redundant in relation to the stated purposes of their processing;
- In the process of personal data processing, the accuracy of personal data, their sufficiency and relevance with respect to the purposes of processing personal data shall be ensured, and, if necessary, the required measures shall be taken to delete or specify incomplete or inaccurate personal data;
- the personal data storage is carried out no longer than it is required by the purposes of personal data processing;
- safety measures against unauthorized or illegal processing, as well as against accidental loss, damage or destruction.

## 7. WHO HAS ACCESS TO THE INFORMATION AND TO WHOM IT CAN BE TRANSFERRED

In most cases, personal data are processed automatically without access thereto by individuals. If such access is required, it can be provided only to those employees of the Company who need it to perform their official tasks. In order to protect and ensure the confidentiality of data, all employees have committed themselves to comply with the internal rules and procedures regarding the personal data processing.

We disclose the information to third parties only in cases stipulated by this Policy or applicable law, and only to the necessary extent, based on the purpose of disclosure.

Thus, the disclosure is allowed to:

- the Service Providers. For example, the services which produce emailing. Such providers will only use personal data in accordance with our instructions and for the purposes specified in this Policy. Additional information on the limits of disclosure and persons to whom the data may be disclosed is contained in section 11 below.
- For compliance with applicable law. Thus, the data may be disclosed in case of a request from the competent authority.
- In order to prevent illegal actions, protect the rights and ensure the security of the Company and other persons, protection against claims and lawsuits.
- Upon the information transfer during reorganization of the Company, as well as entering into agreements on transfer of rights and/or obligations under the contracts. In this case, we are entitled to disclose the information to the person/body acquiring the rights/obligations under the contracts, as well as to the person/body created as a result of reorganization.
- Generalized, aggregate and depersonalized (anonymized) data.
- In other cases, upon receipt of your consent.

## 8. WHERE IS THE INFORMATION STORED AND PROCESSED

We carry out recording, systematization, accumulation, storage, refinement (update, change), retrieval of personal data using the databases located in the territory of the Russian Federation. We may transfer data to the third parties specified in Section 7 of the Policy, located outside the territory of the Russian Federation. In this case, the level of data protection will be provided not less than that established by this Policy.

## 9. HOW LONG IS THE INFORMATION STORED

We store the data during the time necessary for the purposes of their collection or to comply with requirements of the applicable law.

If you want your personal data to be deleted from our databases, you can write a request to us to the addresses stated in "Contact Us" section.

Despite the request to delete information, we are entitled to store information if it is necessary for legitimate business interests, performance of obligations and resolution of disputes.

Upon achieving the processing goals or in case of loss of the need to achieve these goals, the data must be destroyed or depersonalized.

## 10. YOUR RIGHTS

We guarantee the observance of your rights in accordance with applicable law and recognized standards of international law.

You are entitled:

- To withdraw consent to the processing of personal data (if the processing is based on the consent);
- To receive information on the processing of personal data (of the data collected, processing purposes and other aspects of processing);
- To get access to your personal data, require exclusion or adjustment of incorrect or incomplete personal data;
- To require a copy of any record containing the personal data;
- To require deletion of your personal data. However, we are entitled to continue processing the data after the request is received, if it is allowed by applicable law;
- To require restrictions on processing of your personal data. Such a right allows only in strictly

defined cases, such as, for example, challenging the accuracy of data (in the period of data refinement), establishing unlawfulness of processing. In case of a statement on processing restriction, we are not entitled to perform any type of processing without your consent. However, without such consent, the processing may be carried out as necessary to protect against claims and lawsuits;

- To oppose your personal data processing, for example, the personal data processing for direct marketing purposes;
- To appeal to the court any illegal actions or omissions to act under processing and protection of your personal data.

Other additional rights may be granted by applicable law.

We ask you to send any inquiries related to the exercise of your rights to the addresses indicated in "Contact Us" section.

If you are not satisfied with our response, you have the right to file a complaint with the competent authority.

## **11. HOW DO WE USE COOKIES AND ANALYSIS TOOLS ON THE SITES**

### **11.1. What are cookies**

Cookies mean small text files placed on the device you use to access the Sites. These files contain the information about your actions and preferences for a certain period (for example, name to log in the protected sections of the Sites, language, font size and other display settings), so that you do not have to adjust these settings every time you visit the Sites or view their pages.

The Sites use the following types of cookies:

- strictly necessary cookies/technical cookies: these cookies are necessary for the Sites operation; among other things, they allow to identify your hardware and software, including the type of your browser;
- statistical/analytical cookies: these cookie files allow to recognize users, count their number and collect information, such as operations you perform on the Sites, including information about the web pages you have visited and the content you receive;
- technical cookies: these cookies collect the information about how users interact with the Sites, which makes it possible to identify errors and test new features to improve the performance of the Sites.

### **11.2. How long are cookies stored on your device?**

We use the information contained in the cookies only for the above purposes, after which the collected data will be stored on your device for a period that may depend on the appropriate type of cookies, but not exceeding the period required to reach their goal, after which they will be automatically removed from your system.

### **11.3. Cookie Management**

When you visit the Sites for the first time, your consent to the use of cookies may be requested. If, after giving your consent, you have changed your decision, you can delete the cookies stored in your browser (usually it can be done in the browser settings, for more information, please refer to the browser operation manual or the website of its developer). After that, a pop-up window will appear with a request for consent, and you can make a different choice.

The use of cookies is not a compulsory condition for the use of the Sites, however, these files simplify navigation through the Sites. Cookies can be deleted or blocked, however, in this case, many functions of the website may work unsatisfactorily. You can also change your browser settings to accept or decline all cookies or the cookies only from the specific Sites by default.

### 11.3. What analysis tools do we use

We use the following web analysis services in order to optimize the Sites:

#### 1) Google Analytics

Service provider – Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA.

Google Analytics service uses cookie technology. The information generated by the cookie about your use of the Sites is usually transmitted and stored on Google servers in the USA.

We have enabled the IP anonymization feature on the Sites. As a result, your IP address will be anonymized before being sent to the United States. This information is used to compile reports on the Sites activity. The IP address transmitted by your browser as part of Google Analytics is not combined with other data from Google.

You may stop using Google Analytics cookies by selecting the appropriate settings in your browser, however, please note that in this case you will not be able to use all features of the Sites. You can also prohibit Google from collecting data generated by cookies and related to your use of the Sites (including your IP address), and also prohibit Google from processing these data by downloading and installing the browser plug-in, available at the following link: <https://tools.google.com/dl-page/gaoptout?hl=ru>

You can prohibit Google Analytics from collecting your information by clicking the following link. The cookie will be set to refuse to collect your data on subsequent visits to this Site. Disable Google Analytics.

For more information on how Google Analytics uses the user data, see the Google Privacy Policy: <https://support.google.com/analytics/answer/6004245?hl=ru>.

#### 2) Yandex.Metrika Service

The sites use the web analytics service Yandex.Metrika provided by the company YANDEX LLC, 16, L. Tolstogo St., Moscow, Russia 119021 (hereinafter referred to as Yandex).

Yandex.Metrika service uses cookie technology.

The information collected by cookie cannot identify you, but it can help us improve the performance of the Sites. Information about your use of the Sites, collected via a cookie, will be transferred to Yandex and stored on a Yandex server in the EU and the Russian Federation. Yandex will process this information to evaluate your use of the Sites and to compile reports on the Sites activity. Yandex processes this information in the manner prescribed by the terms of use of Yandex.Metrika service. You may refuse the use of Yandex.Metrika cookies by selecting the appropriate settings in the browser. Also you may use the instrument – <https://yandex.ru/support/metrika/general/opt-out.html>. However, this may affect operation of the Sites certain features. By using the Sites, you agree to the data processing about you by Yandex in the manner and for the purposes stated above.

### 12. UPDATING OF THIS POLICY

We have the right to make changes to this Policy taking into account changes in legislation and in connection with changes in the work of the Sites. All changes are subject to publication on the Sites. If the changes directly or indirectly affect your rights, we will send you a notice by email and/or using the Site.

### 14. CONTACTS

Please send any questions and inquiries related to the personal data processing by the Company to email address [office@nexign.com](mailto:office@nexign.com) or in writing to the address: 4, Uralskaya St., St. Petersburg Russia 199155. You can also use these addresses to contact the person responsible for the Company's compliance with applicable laws in the field of personal data processing and protection.

We will strive to consider incoming applications as soon as possible, but in any case not more than one month.

Your request status can be clarified by calling us at +7 (812) 326-12-99.