

[название компании и адрес]

This Privacy Notice (hereinafter referred to as the Notice) describes a principle of collection, storage, processing and disclosure of information obtained from users on our website available at www.akomponent.com.

Delivery of data to us by using and interacting with the Website's services and Services contemplates an automatic consent to use the said data in accordance with this Notice.

You should not use the services or website and give any data, unless you accept the conditions of the Notice. Nothing in this Notice shall be interpreted as deviation from the conditions of any other agreement between the Company and you.

Please note that the Website and/or Services may contain links to third party websites, products or services that are not governed by provisions of this Notice.

The Notice shall not apply to the actions of entities and institutions that are not controlled by Company.

MAIN CHARACTERISTICS:

- Personal data shall be transmitted only voluntarily under the applicable laws.
- By requesting the Services from us, you expressly and irrevocably consent to processing of Personal Data in accordance with this Notice.
- Persons of the full legal age are exclusively entitled to purchase any services of the Company or provide personal data.
- Pursuant to GDPR, the Company shall not collect and process confidential Personal Data, classified as "Specific data category".
- You are entitled to require reviewing, changing, deleting or restricting the processing of your personal data in possession of the Company. In these cases provision of certain services will be limited.
- We are entitled to transmit your Personal Data beyond a geographic area where the Services are collected or accessed. By purchasing the Company's services, you expressly agree with such a transmission. If a level of confidentiality protection in your country does not meet the internationally recognized standards, we will ensure a proper protection of data to be transmitted to our bases in accordance with the contract and other steps related to an appropriate protection.
- We do not distribute Personal Data of users among third parties.
- We do not carry out an automatic profiling of the users.

Personal Data means any information that identifies or may facilitate identification of a individual, including, inter alia, first and last names, telephone numbers, email address, IP-address, payment information etc.

Non-personal Data means any information that we collect in order to analyze frequency, volume, delay, account of number of the pages visited, when the User looks through or interacts with content and materials displayed via our Services.

We use third party advertising campaigns for an ad impression when visiting our Website by you. These campaigns may use generic information (other than your name, address, email

address or telephone number) about your visits of this website and other websites for the purpose of advertising the goods and services you may be interested in.

Personal Data

1.1 Account. To use the Services and/or Website, you may be offered to create an account indicating certain Personal Data, such as: name, email address, address, identification documents, telephone number, and credit card details.

1.2 Then we will collect and process information related to your transactions and actions taken via the Services, including billing information, forms and orders, services you bought or participated in etc.

1.3. We register the users by IP-address and other unique identifiers of users or devices.

1.4 If you contact us as to customer support, we will collect data connected with these messages as well.

1.5. Notice of calls recorded. Based on the aforesaid and in connection with the Services, you acknowledge and agree that telephone conversations and/or online chat with representatives of the Company (hereinafter referred to as the Calls) may be recorded, transcribed, tracked, analyzed and/or backed up. For the purpose of assuring quality of accounting, you expressly consent to that recording and/or monitoring in accordance with this Notice. In the event that you don't want recording, please inform that in the beginning of conversation or chat. Should you have any questions as to your Personal Data processing, please contact us by emailing at: info@akomponent.ru

2. What will the Company do with my data?

2.1. Non-personal data. Non-personal data is used for analysis of clicks flow in order to constantly improve and maintain the performance of the Website and Services and to observe level of involvement in our services, to ensure more personalized experience and individualization of content, technical operation of our network, to prevent a fraudulent use of our Services and develop new services and functions, and for the purposes of general business analytics. We are entitled to use information in the aggregate in order to understand in which our Users, as a group, use the services and resources made available on our Website. This information is of a statistical nature.

2.2 Personal Data. Personal Data is used only for limited purposes, such as:

2.2.1. providing you with the Services, process transactions, giving notices of your transactions and charging fees for our services.

2.2.2 resolving any disputes, dealing with the maintenance and support issues, and answering the questions or notes.

2.2.3. Preventing potentially forbidden or illegal actions, fraud, misappropriation, violations, theft of personal data and any other unauthorized use of the Website or Service, and ensuring compliance with our Terms and Conditions.

2.2.4. Protecting safety or integrity of our data bases and Services, and taking legal liability steps.

2.2.5. Improving quality of the Services, developing new functions and products

2.2.6. Improving your work experience with the Website and setting our Services in accordance with your interests, including via targeted advertisement.

2.2.7. protecting our legal interests to the extent, to which it is not violated by rights and freedoms of individuals, as permitted by applicable laws.

2.2.8. Providing material updates and amendments to the terms and conditions of this Notice.

3. Does the Company use cookie files?

Yes, we use files of data, such as cookie files, pixel tags, Flash files cookie and other files of local storage to be provided by your browser or appropriate applications (Cookies). We use these technologies in order to: know you as a client; set our Services, content and advertisement; measure efficiency of an advertisement; guarantee safety of your account; reduce a risk and prevent fraud; promote trust and safety on our Website and Services.

Cookie files may be placed on your device by Company's operator of the website when you visit it.

Cookie files may be differentiated by time of its use.

Cookie session files mean cookie files existent between the period of your visiting website and session viewing end. Cookie session files expire and are automatically deleted when closing your Internet browser.

Persistent cookie mean cookie that remain on your device. They do not expire and are not automatically deleted when closing a browser. Duration of persistent cookie on your device varies. We and third parties use persistent cookie for diverse purposes: preserving your preferences so that they are available for the next visit, more precise accounting your visits of our websites and applications, your return frequency, monitoring change in your use of our websites and applications with time, and measuring efficiency of advertisement efforts.

At any time you may program a browser on blocking cookie, but this blocking may prevent us to provide you with certain or all the Services.

If you don't want to receive cookie from us, other than technical cookie, you may send a message by following instructions related to refusal to use cookie on our websites and in applications, or by sending email at: info@akomponent.ru. If you visit our website from EEA, we will not use third party cookie and persistent cookie without your prior consent.

Should you have questions as to use of cookie by us, unstipulated herein, you may contact us by emailing at: info@akomponent.ru

4. How do we protect your personal data?

We use the common methods of collection, storage and processing of data, and take security steps for protection against unauthorized access, modification, disclosure or destruction of your Personal Data. Personal Data is exchanged between the Website and its Users through SSL encrypted and protected by digital signatures.

5. How can you control your personal data?

5.1. Review and modification of your Personal Data. You are entitled to review your Personal Data by giving a request at: info@akomponent.ru. In the event that any Personal Data is inadequate or out of date, you can update and correct them by giving an appropriate notice to us.

5.2. Right to delete and restrict. You may also request your Personal Data to be deleted or restricted. The Company will comply with these requests to the extent permitted by applicable laws.

5.3. Personal Data Portability. To the extent attributable to you and Services, you may be entitled to request your personal data to be conveyed. We will comply with these requests to the extent permitted by applicable laws.

5.4. Data storage. We reserve the right to keep any Personal Data within the required period in order to: (1) pursue the goals described herein; (2) meet the legal requirements and liability; (3) analyze and develop the Services; (4) meet the applicable laws. Non-personal data and statistical anonymous data shall be preserved by us without limitations.

6. Will the company share my personal data with third parties?

Personal data of a user of our Website and Services is not used by Company in relationship with third parties for commercial or other purposes.

6.1. Non-personal data, summarized statistical or otherwise collected anonymous data may be transferred to third parties without limitations at our option. That information does not contain personal data and is used for development of the content and services for our users and clients.

6.2. We transmit Personal Data only in the following exclusive cases:

6.2.1. to trusted partners and third parties that help us in utilization of the Services and conduct of our business, such as fraud prevention, bills collection, marketing, bills servicing and technological services.

6.2.2. to third party suppliers that provide us with the Services. For instance, we transmit personal data to clearing service providers of credit cards for charging fees for transaction. We transmit Personal Data to lottery operator in order to buy the lottery tickets for you.

6.2.3. For personalization of your experience of the Services use.

6.2.4. Where required in order to discover and prevent potentially illegal actions and fraud, and make decisions on the products, services and communications.

6.2.5. to our branches and associated companies, such as: subsidiaries and parent companies.

6.2.6. for compliance with a legal demand of law enforcement agencies, for protection of your vital interests or vital interests of others, for protection of safety or integrity of our databases or Services, for precautions against legal liability or in case of corporate sale, merger, reorganization, dissolution or other organizational event.

6.2.7. to third party with your consent.

7. On which legal grounds does the Company process Personal Data?

7.1. Actions related to personal data processing are based on necessity to render the Services to our users and clients.

7.2. Processing procedure is required for observance of our legal interests or legal interests of third party, save when these interests prevail over interests or fundamental rights and freedoms of individuals that required protection of Personal Data.

7.3. Processing actions may be taken only with your consent. You are entitled to revoke your consent by emailing at: info@akomponent.ru. Please note that in case of revocation of your consent to Personal Data processing, we will be unable to render you with certain or all the Services.

8. Will the Company internationally transmit my Personal Data?

8.1. At the present time our databases are located in the Netherlands, therefore we use Digital Ocean that is consistent with the Privacy Notice.

Some of our processing modules are made in Israel. Pursuant to regulation of the European Commission, the state of Israel ensures an adequate level of confidentiality and protection of data, therefore transmission of Personal Data from EU to Israel is legal without further authorization in accordance with GDPR.

8.2. Any other transmission of Personal Data from EU to third country (other than Israel) shall be carried out in accordance with the applicable laws, including by ensuring an adequate protection or other application of the appropriate safety measures for observance of the rights of our Users.

9. Will I receive the advertising materials from the Company?

If you give us an electronic confirmation or otherwise agree to receive the marketing materials, we will be able to send you information about new products, functions, activities, services or information bulletins you may be interested in. By accepting this Notice, you give us your written consent to receipt of the marketing materials. You may refuse to receive these materials at any time by contacting us at info@akomponent.ru

10. Amendments to the Privacy Notice

The Company is entitled to update the notice at any time at its option. Information of that will be displayed at the bottom of this page. We advise you to check this page regularly for amendments so that you will be aware of our efforts in protection of personal data we collect. By accepting this Notice, you agree that you shall check and monitor the amendments periodically.

11. Regulations Application.

Provisions incorporated in this Notice as to the issues governed in accordance with GDPR will apply only to Personal Data processing in accordance with application provisions therein. If GDPR do not apply to processing of your Personal Data, some of the provisions above shall not attribute to you.

13. Feedback

Should you have any questions connected with this Notice, please contact us at:
info@akomponent.ru – we will use the best efforts in order to resolve them immediately.

You are also entitled to file a complaint with an appropriate instance in case of discovery of infringement of confidentiality of your personal data.

Last time this document was updated in June 2019.