## PRIVACY POLICY OF LIMITED LIABILITY COMPANY "KSII"

This Privacy Policy (hereinafter referred to as the "Policy of Confidentiality") of the Limited Liability Company "KSII" (hereinafter referred to as the "Operator") is drafted in accordance with the requirements of the Federal Law of July 27, 2006. No. 152-FZ "On Personal Data" (hereinafter - the "Law on Personal Data") and defines the procedure for processing personal data and measures to ensure the security of personal data of the Users of the website <a href="https://airelations.io/">https://airelations.io/</a>.

This Privacy Policy regarding the processing of personal data applies to all information that the Operator may receive from the Users of the website.

Visiting the website does not oblige the User to provide personal data, except in cases where the Operator requests the User to provide personal data in order for the Operator to be able to sell the User a product or provide a service.

The User acknowledges and confirms that he has carefully and fully familiarized himself with this Policy and the terms of processing of his personal data contained therein, indicated by him in the relevant fields when registering on the website and its further use; acknowledges and confirms that all the provisions of this Policy and the terms of processing of his personal data are clear to him, and gives his consent to the processing by the Operator of the personal data provided by him on the terms specified in this Policy, and confirms that, by giving such consent, he acts freely, by his own will and in his own interest.

## BASIC CONCEPTS USED IN THE PRIVACY POLICY

**Automated processing of personal data** — processing of personal data using computer technology;

**Blocking of personal data** — temporary suspension of the processing of personal data (except in cases where processing is necessary to clarify personal data);

**Website** — a set of graphic and information materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address of the website <a href="https://airelations.io/">https://airelations.io/</a>;

**Information system of personal data** — a set of personal data contained in databases, and information technologies and technical means ensuring their processing;

**Anonymization of personal data** — actions as a result of which it is impossible to determine, without the use of additional information, the belonging of personal data to a specific User or other subject of personal data;

**Processing of personal data** – any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;

**Operator** - a state body, a municipal body, a legal entity or a natural person, independently or jointly with other persons organizing and (or) carrying out the processing of personal data, as

well as determining the purposes of processing personal data, the composition of personal data to be processed, the actions (operations) performed with personal data;

**Personal data** — any information relating directly or indirectly to a specific or identifiable User of the website;

**User** – any visitor to the website;

**Provision of personal data** — actions aimed at disclosing personal data to a specific person or a specific circle of persons;

**Dissemination of personal data** — any actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or at familiarizing an unlimited circle of persons with personal data, including the publication of personal data in the media, placement in information and telecommunication networks or providing access to personal data in any other way;

**Destruction of personal data** — any actions as a result of which personal data are irretrievably destroyed with the impossibility of further restoring the content of personal data in the information system of personal data and (or) as a result of which the material carriers of personal data are destroyed.

# COMPOSITION, COLLECTION, PROCESSING OF PERSONAL DATA

The processing of personal data is carried out by the Operator with and without the use of automation tools.

The operator collects personal data provided by the User when visiting this website.

The composition of personal data: Full name of the User, mobile phone number of the User, e-mail address of the User.

The collection of these data is carried out when:

The user sends a message to the email address <a href="https://airelations.io/">https://airelations.io/</a> in order to obtain information about the Operator's products.

The user acknowledges that the use of the site is regarded by the Operator and the User as written consent to the processing of personal data. The use of the site without accepting the terms of this Policy is not allowed.

By providing their personal data directly by filling out the fields of an online application when registering on the pages of the website, placing an order for a service, subscribing to a newsletter or in any other section of the website, the User gives the Operator consent to the processing of personal data.

#### PURPOSES OF COLLECTION AND PROCESSING OF PERSONAL DATA

The collection of personal data is carried out for the purposes of:
Providing Users of the website with information about the Operator's products;
Providing Users of the website with the opportunity to use this website and its services;
For other purposes on the basis of the User's requests or consent, unless otherwise provided by law;

It is permissible to use the data provided by the User for statistical research and calculations, as well as to obtain information about what is of interest to the Users of the Operator's website, but the main requirement when working with personal data in this case is the protection of personal data.

The operator performs automated and non-automated processing of personal data in the amount sufficient to achieve the purposes of processing personal data specified in this Privacy Policy.

#### ACCESS TO PERSONAL DATA

Access to personal data is provided to authorized persons of the Operator, with whom relevant agreements on the confidentiality of personal data have been concluded.

Authorized persons have the right to access only those personal data that are necessary for the performance of specific functions included in their scope of duties to ensure the achievement of the purposes of processing personal data specified in this Privacy Policy.

Access to personal data may be granted to regulatory authorities upon the availability of documents on the basis of which they conduct an inspection.

#### STORAGE AND TRANSFER OF PERSONAL DATA

The Operator's servers and servers under the control of Russian companies that act on behalf of the Operator and are responsible for the processing of personal data are used to store personal data, and the Operator has entered into an agreement with such companies, according to which they undertake to comply with all provisions on the protection of personal data (hereinafter referred to as the "partner").

Neither the Operator nor the partners transfer the User's personal data to third parties in any form, except in cases where the transfer of personal data is carried out on the basis of the User's consent or in cases provided for by law. The Operator controls the use of the provided personal data and is responsible for the use of the provided personal data.

The Operator undertakes not to disclose the personal data received from the User. It is not considered a violation of this obligation for the Operator to provide personal data to partners in order to fulfill its obligations to the Users. It is not considered a violation of the obligations to disclose personal data in accordance with the reasonable and applicable requirements of the law.

#### PROTECTION OF PERSONAL DATA

The operator has the appropriate capabilities and takes measures aimed at ensuring the security and confidentiality of the User's personal data. The operator undertakes to ensure the confidentiality of personal data in accordance with internal regulations on the protection of personal data, the order of the FSTEC of Russia of 18.02.2013 No. 21 "On approval of the Composition and content of organizational and technical measures to ensure the security of personal data during their processing in personal data information systems", and the partners undertake to ensure the confidentiality of personal data in accordance with the agreements on the processing of personal data; internal regulations on the protection of personal data and agreements on the processing of personal data.

## PERIOD OF STORAGE OF PERSONAL DATA

The Operator stores personal data either until the personal data are necessary for the purposes of collecting and processing personal data specified in this Privacy Policy, or until the User revokes his consent to the processing of his personal data, or until all applicable laws and regulations are complied with (for example, in the case of ongoing litigation).

## RIGHTS TO THE PROTECTION OF PERSONAL DATA

The right to information, the right to access information and the right to clarify data. The User has the right to receive all information about his personal data, to have access to his personal data, to correct and update his personal data in the Operator's system in the event that the User assumes that the personal data have lost their relevance, are incomplete or inaccurate.

The right to erasure of personal data. The user has the right to demand the deletion of his personal data from the Operator's system.

The right to restrict the processing of personal data and to object to the processing of personal data. The User has the right to demand to restrict the processing of certain categories of personal data and to object to the processing of personal data.

The right to withdraw consent to the processing of personal data. The user has the right at any time to withdraw his consent to the processing of his personal data.

The right to the return of personal data. The User has the right to demand that the Operator return the User's personal data.

## DESTRUCTION AND BLOCKING OF PERSONAL DATA

The Operator is obliged to destroy the User's personal data (or ensure their destruction) in the following cases:

Upon submission by the User of information confirming that the personal data are illegally obtained or are not necessary for the stated purpose of processing — within seven working days from the date of submission of such information (Part 1 of Art. 14, Part 3 of Art. 20 of the Law on Personal Data);

Upon detection of unlawful processing of personal data, if it is impossible to ensure its lawfulness, — within ten working days from the date of detection of the unlawful processing of personal data (Part 3 of Art. 21 of the Law on Personal Data);

Upon achievement of the purpose of processing personal data - within thirty days from the date of achievement of the purpose of processing personal data (Part 4 of Art. 21 of the Law on Personal Data);

Upon withdrawal by the User of his consent to the processing of his personal data and in the event that the storage of personal data is no longer required for the purposes of processing personal data — within thirty days from the date of achievement of the purpose of processing personal data (Part 5 of Art. 21 of the Law on Personal Data);

In the absence of the possibility of destroying personal data within the specified time limits, the Operator shall block such personal data or ensure their blocking (if the processing of personal data is carried out by another person acting on behalf of the operator) and ensure the destruction

of personal data within a period not exceeding six months, unless a different period is established by federal laws.

The procedure for documenting the fact of destruction of the User's personal data is determined by the Operator of personal data independently. The fact of destruction of personal data is formalized by an act on the termination of the processing of personal data.

## **COPYRIGHT**

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## **USE OF COOKIES**

Cookies are files or pieces of information that may be stored on your computer (or other internet-enabled devices, such as a smartphone or tablet) when you visit a Website. This type of file may store various information, such as the type of browser, the operating system used, language settings or other personal page settings, data about your use of the site, order information or login data. As a rule, cookies are not used to collect data that directly identifies a natural person. However, information obtained through cookies may be correlated with a natural person at the time of providing personal information of such a natural person in combination with such information as an e-mail address.

## Cookies are used for:

customizing the content of the Website pages in accordance with the User's preferences, as well as optimizing the Website; in particular, these files allow you to recognize your device and, accordingly, configure the viewing of the Website page to your individual needs; creating statistics that help to understand how Users' use the Website, this allows to improve the structure and content of the Website;

maintaining the User's session on the Website (after logging in), so that Users do not have to reenter their login and password on each page.

Thus, cookies do not harm your device and allow us to provide you with a faster and better navigation on the Website. Cookies are present, as a rule, in a significant number in every user's browser and are sometimes stored for a long time.

We use cookies to save the user settings of our site. By browsing our website, you give your consent to the use of cookies.

## **LIABILITY**

Persons guilty of violating the norms governing the receipt, processing and protection of personal data shall bear the responsibility established by Russian law.

## FINAL PROVISIONS

This Policy is valid indefinitely from the date of its publication. The operator has the right to make changes to this Policy. When making changes in the current version, the date of the last update is indicated. The new version of the Policy comes into force from the moment it is posted, unless otherwise provided by the new version of the Policy.

Withdrawal of consent to the processing of personal data may be carried out by sending the User a corresponding order in simple written form to the postal address or e-mail address specified in the "Contact Information" section of this Policy.

The Operator is not responsible for the use (both lawful and unlawful) by third parties of the information posted by the User on the website, including its reproduction and distribution, carried out in all possible ways.

The substantive and procedural law of the Russian Federation shall apply to this Policy and the relationship between the User and the Operator arising in connection with the application of this Policy.

## **CONTACT DETAILS**

We ask the Users of the website to send all inquiries or claims regarding personal data to the following address:

LLC "KSII" Russian Federation, TIN 9725007514 PSRN 1077758650441 KPP 772501001

Address: 115419, Moscow, 2-iy Roshchinskiy proezd, 8, bldg. 2

Or by email: info@airelations.io