

# Privacy Policy

**Last updated:** February 28, 2024.

## 1. General provisions

**Limited Liability Company "WIN2WIN COMMUNICATIONS GROUP OF COMPANIES"** has a strong focus on maintaining the confidentiality of information provided by Users of the Website and makes every possible effort to protect it, store it safely and not disclose it.

This Privacy Policy with regard to processing and protection of personal data (hereinafter referred to as the "**Privacy Policy**") regulates the procedure used by **WIN2WIN COMMUNICATIONS GROUP of COMPANIES LLC** (hereinafter referred to as the "**Company**" or "**Operator**", OGRN 5167746494670, legal address: 125130, Moscow, 11 Staropetrovsky pr., building 1, floor 4, room 6) to process your personal data.

The Company collects, uses and protects any personal data that you provide to the Company while using (1) any pages of the Website with the domain <https://win2win.ru/> and/or its subdomains covered or referred to by this Privacy Policy (hereinafter collectively referred to as the "**Website**"); or (2) any other means of interaction with you related to communications carried out by the Operator. By accessing the Website&&& from any device and communicating with the Operator in any form, and providing your personal data to the Operator, you consent to the processing of your personal data in accordance with this Privacy Policy.

This Privacy Policy also contains information about any instances your personal data may be transferred to other third parties (for example, to service providers of the Operator).

If the User disagrees with the terms of the Privacy Policy, the User must stop using the Website <https://win2win.ru/>.

This Privacy Policy covers solely the Company's Website. The Company does not control and is not responsible for any third-party Websites the User may access using the links available on the Website <https://win2win.ru/>, or for the protection or confidentiality of any information collected by third-party Websites or services.

The Operator does not verify the accuracy of any personal data provided by the User of the Website <https://win2win.ru/>.

This Privacy Policy has been written in accordance with the requirements of Federal Law No. 152-FZ dated 27.07.2006 "On Personal Data" (hereinafter referred to as the "**Personal Data Law**") and describes the procedure of personal data processing and the measures to ensure the protection of any personal data taken by the Company.

This Operator's policy regarding the processing of personal data applies to all and any information that the Operator may receive from Users of the Website <https://win2win.ru/>.

---

**WIN2WIN COMMUNICATIONS GROUP OF COMPANIES, LLC**

Legal address: 125130, Moscow, 11 Staropetrovsky pr., building 1, floor 4, room 6  
Factual address: 125130, Moscow, 11 Staropetrovsky pr., building 1, floor 4, office 409  
OGRN 5167746494670, TIN 7714966378, KPP 7714966378, Settlement account 40702810738000071324 in Sberbank PJSC  
Corr/acc 3010181040000000225, BIC 044525225

## 2. Basic concepts used in this Policy

1. *Automated processing of personal data* means processing of personal data using computer technology.
2. *Blocking of personal data* means temporary suspension of personal data processing (unless the processing is required to verify personal data).
3. *Website* means an Internet resource which is a collection of information and intellectual property contained in an information system (including computer programs, databases, graphic interface design (design), etc.), access to which is provided from various user devices connected to the Internet through special software for Web browsing (browser) at: <https://win2win.ru/> (including domains of the lower levels related to these addresses) or mobile applications.
4. *Personal data information system* means a collection of personal data contained in databases, and information technologies and technical means that ensure their processing.
5. *Depersonalization of personal data* means actions as a result of which it becomes impossible to define belonging of the personal data to the specific User or any other subject of personal data without use of additional information.
6. *Personal data processing* means any action (transaction) or a set of actions (transactions) performed with or without the use of automation tools with personal data, including collecting, recording, systematizing, accumulating, storing, improving (updating, modifying), retrieving, using, transferring (distributing, sharing, accessing), depersonalizing, blocking, deleting, destroying personal data.
7. *Operator* means any public agency, municipal body, legal entity or individual, independently or jointly with other persons organizing and (or) processing personal data, as well as determining the purposes of personal data processing, the contents of personal data to be processed, actions (transactions) to be performed with personal data.
8. *Personal data* means any information related, directly or indirectly, to a specific or identifiable User of the Website.
9. *User* means an individual who accesses the Website and uses the information contained on it (both registered users of the Website and unregistered users (visitors)).
10. *Personal data sharing* means actions aimed at disclosing personal data to a certain person or a certain group of persons.
11. *Distribution of personal data* means any actions aimed at disclosing personal data to any number of unspecified persons (transfer of personal data) or making any number of unspecified persons familiar with personal data, including posting personal data in the media, on information and telecom networks or providing access to personal data in any other way.
12. *Cross-border transfer of personal data* means any transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.
13. *Destruction of personal data* means any actions as a result of which personal data is irreversibly destroyed, without the possibility of restoration of the content of personal data in the personal data information system, and (or) physical personal data storage media are destroyed.
14. *Cookies* or *cookie files* mean a small piece of data sent by a web server and stored on the user's computer, which the web client or web browser sends to the web server every time in an HTTP request when trying to open a page of the corresponding Website.
15. *IP address* means a unique network address of a device in a computer network built using the IP protocol.

## 3. Personal data

The Company collects the following personal data:

- personal data that the Website User provides to the Company by making a call/writing a message that is sent to an employee of the Company, for the User to be called back or given a written response using the phone number specified by the User (including messengers);

---

### WIN2WIN COMMUNICATIONS GROUP OF COMPANIES, LLC

Legal address: 125130, Moscow, 11 Staropetrovsky pr., building 1, floor 4, room 6  
Factual address: 125130, Moscow, 11 Staropetrovsky pr., building 1, floor 4, office 409  
OGRN 5167746494670, TIN 7714966378, KPP 7714966378, Settlement account 40702810738000071324 in Sberbank PJSC  
Corr/acc 30101810400000000225, BIC 044525225

- personal data and other information contained in messages the User sends the Company directly to the e-mail addresses indicated on the Website or through messengers, links to which are provided on the Website;
- IP addresses of Internet service providers that provide the User with access to the Website;
- information about the fact, date, and time of visiting network addresses and Websites on the Internet;
- information about the fact and number of downloads by the User of files from the website on the Internet, as well as the name and type of downloaded files;
- information about the duration of the user session;
- collection and processing of depersonalized technical data about visitors ("cookies") using web analytics services (Yandex.Metrica and Google Analytics, etc.), which are automatically sent by the device with which the User accesses the Website, including technical characteristics of the device, information saved in "cookies", which were sent to the Website User's device, information about one's browser, date and time of access to the Website, addresses of the requested pages and other similar information. If cookies are disabled, it may result in the inability to access parts of the Website;
- User's search queries;
- geographical address the User is accessing the Internet from;
- full name;
- e-mail address;
- contact phone number;
- name of the employer;
- title/role;
- address the User stays/resides at;
- other information provided by you when visiting the Website and using its features.

The Operator does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, or private life.

Processing of personal data authorized for distribution from among the special categories of personal data specified in Part 1 Article 10 Personal Data Law is allowed if the limitations and conditions specified in Article 10.1 Personal Data Law are met and observed.

#### **4. Principles of personal data processing**

When processing personal data, the Company adheres to the following principles:

- The principle of legality and a fair basis
- The principle of limiting the processing of personal data to the achievement of specific, predetermined and legitimate goals
- The principle of preventing the processing of personal data incompatible with the purposes of personal data collection
- The principle of preventing the unification of databases containing personal data, the processing of which is carried out for the purposes incompatible with each other
- The principle of processing only those personal data that meet the purposes of their processing
- The principle of compliance of the content and volume of the processed personal data with the stated purposes of processing
- The principle of preventing the processing of personal data that is excessive relative to the stated purposes of their processing
- The principle of ensuring the accuracy, sufficiency and relevance of personal data relative to the purposes of personal data processing
- The principle of destruction or depersonalization of personal data upon achievement of the purposes of their processing or in case of loss of the need to achieve these goals, if it is

---

**WIN2WIN COMMUNICATIONS GROUP OF COMPANIES, LLC**

Legal address: 125130, Moscow, 11 Staropetrovsky pr., building 1, floor 4, room 6  
Factual address: 125130, Moscow, 11 Staropetrovsky pr., building 1, floor 4, office 409  
OGRN 5167746494670, TIN 7714966378, KPP 7714966378, Settlement account 40702810738000071324 in Sberbank PJSC  
Corr/acc 3010181040000000225, BIC 044525225

impossible for the Operator to eliminate violations of personal data, unless otherwise provided by the federal law.

## 5. Purposes of personal data processing

The Company processes personal data of the Website Users exclusively for the purposes for which they are provided, namely:

- providing the Website User with answers and materials in response to their request;
- User identification and contacting Users;
- offering Users services provided by the Company and its affiliates, as well as conducting business negotiations with the User;
- conclusion, execution and termination of civil law contracts;
- providing the User with access to the services, information and/or materials contained on the Website;
- notifying about the Company's products and services;
- improving the quality of service, the usability of the Website, and the development of new features.

The Company processes technical data of Users (including "cookies") collected through web analytics services for:

- ensuring the operation and security of the Website;
- improving the quality of the Website's operation;

The Operator does not share personal data in publicly available sources. The Operator does not make decisions that give rise to legal consequences for the User or otherwise affect the rights and legitimate interests of the User on the basis of automated processing of personal data.

## 6. Legal grounds for personal data processing

The processing and protection of personal data in the Company is carried out in accordance with the provisions of the Constitution of the Russian Federation, the Law on Personal Data, by-laws, and other federal laws outlining the cases and specifics of personal data processing.

The legal grounds for processing of personal data by the Operator are also as follows:  
– regulations covering the Operator's activities;  
– constituent documents and local acts of the Operator;  
– contracts between the Operator and the User – the subject of personal data;  
– Users' consent to the processing of their personal data, to the processing of personal data authorized for distribution.

The user who is the subject of personal data independently decides on the sharing of their personal data and gives consent freely, of their own free will and in their own interest.

## 7. Basic rights and duties of the Operator

### The Operator shall have the right to:

- receive reliable information and/or documents containing personal data from the User who is the subject of personal data;
- if the User who is subject of personal data withdraws Consent to the processing of personal data, the Operator has the right to continue with the processing of personal data without the consent of the subject of personal data, if there are grounds specified in the Personal Data Law;

---

### WIN2WIN COMMUNICATIONS GROUP OF COMPANIES, LLC

Legal address: 125130, Moscow, 11 Staropetrovsky pr., building 1, floor 4, room 6  
Factual address: 125130, Moscow, 11 Staropetrovsky pr., building 1, floor 4, office 409  
OGRN 5167746494670, TIN 7714966378, KPP 7714966378, Settlement account 40702810738000071324 in Sberbank PJSC  
Corr/acc 3010181040000000225, BIC 044525225

– independently determine the contents and list of measures necessary and sufficient to ensure the fulfillment of obligations specified by the Personal Data Law and regulations adopted in accordance with it, unless otherwise provided by the Personal Data Law or other federal laws.

**The Operator shall be obliged to:**

- provide the User who is the subject of personal data, at their request, with the information concerning the processing of their personal data;
- organize the processing of personal data in accordance with the procedure established by the existing laws of the Russian Federation;
- respond to requests and inquiries from personal data subjects and their legal representatives in accordance with the requirements of the Personal Data Law;
- provide the competent body responsible for the protection of rights of personal data subjects with the requested information within 30 days from the date of receiving any such request;
- publish or otherwise provide unrestricted access to this Policy regarding the processing of personal data;
- take legal, organizational and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, sharing, distribution of personal data, as well as from other illegal actions with personal data;
- stop the transfer (distribution, sharing, access) of personal data, stop processing and destroy personal data in the manner and in the cases specified by the Personal Data Law;
- perform other duties specified by the Personal Data Law.

## **8. Basic rights and duties of Users who are subjects of personal data**

**The User who is the subject of personal data shall have the right to:**

- receive the information regarding the processing of their personal data, except in cases specified by federal laws. The information is provided to the personal data subject by the Operator in an accessible form, and it should not contain personal data related to other personal data subjects, except in cases where there are legitimate grounds for disclosure of any such personal data. The list of data and the procedure for obtaining it is established by the Personal Data Law;
- demand from the Operator to improve their personal data, block or destroy those if any such personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, as well as to take measures specified by the law to protect their rights;
- revoke Consent to the processing of personal data;
- appeal to the competent body responsible for the protection of rights of personal data subjects or in court against illegal actions or inaction of the Operator during the processing of their personal data;
- protect their rights and legitimate interests, including compensation for damages and/or compensation for moral damage in court;
- exercise other rights provided by the laws of the Russian Federation.

**The User who is the subject of personal data shall be obliged to:**

- provide the Operator with accurate data about themselves;
- inform the Operator about any improvement (update, modification) of their personal data.

Persons who have provided the Operator with false information about themselves or information about another personal data subject without the latter's consent are liable in accordance with the laws of the Russian Federation.

## **9. Protection of personal data**

To ensure the protection of personal data during processing, the Operator takes all and any necessary and sufficient legal, organizational and technical measures to protect personal data from unauthorized or accidental access, destruction, modification, blocking, copying, sharing, distribution, as well as from other illegal acts with personal data.

---

**WIN2WIN COMMUNICATIONS GROUP OF COMPANIES, LLC**

Legal address: 125130, Moscow, 11 Staropetrovsky pr., building 1, floor 4, room 6  
Factual address: 125130, Moscow, 11 Staropetrovsky pr., building 1, floor 4, office 409  
OGRN 5167746494670, TIN 7714966378, KPP 7714966378, Settlement account 40702810738000071324 in Sberbank PJSC  
Corr/acc 3010181040000000225, BIC 044525225

The Company has adopted local regulations regarding personal data protection. The Company's employees who have access to personal data are familiar with local regulations on personal data protection.

The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the enforcement of the existing laws or if the subject of personal data has given consent to the Operator to transfer data to a third party.

All information collected by third-party services is stored and processed by the said parties (operators) in accordance with their User Agreement and Privacy Policy. The subject of personal data and/or the User shall have to familiarize themselves with these documents in a timely manner. The Operator shall not be responsible for the actions of third parties.

The limitations established by the subject of personal data regarding the transfer (except for granting access), as well as the processing or conditions of processing (except for obtaining access) of personal data allowed for distribution, do not apply when personal data is processed in the state, public and other public interests defined by the laws of the Russian Federation.

The operator stores personal data in the form where the subject of personal data is identifiable no longer than required by the purposes of personal data processing, unless the period of personal data storage is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor.

The grounds for the termination of personal data processing may be the achievement of the goals of personal data processing, the expiration of the consent of the personal data subject or the withdrawal of consent by the personal data subject, as well as the identification of unlawful processing of personal data.

## **10. The list of actions performed by the Operator with the received personal data**

The Operator collects, records, systematizes, accumulates, stores, improves (updates, modifies), retrieves, uses, transfers (distributes, shares, accesses), depersonalizes, blocks, deletes and destroys personal data.

The Operator performs automated processing of personal data with or without receiving and/or transmitting the received information via information and telecommunication networks.

## **11. Cross-border transfer of personal data**

There is no cross-border transfer of personal data of Website users.

## **12. Termination of personal data processing**

The operator stops processing personal data:

- if there are grounds for the termination of processing of personal data specified in the [Consent to the processing of personal data](#), or upon receiving from the User who is the subject of personal



data a withdrawal of Consent to the processing of personal data in the form of a written application in any form sent to: [info@win2win.ru](mailto:info@win2win.ru)

- if the Company is terminated.

### **13.Changing the Privacy Policy**

The Operator has the right to make changes to the Privacy Policy in accordance with the laws of the Russian Federation. By continuing to use the Website after the Policy has been changed, the Website User confirms their consent to the changes.

This Policy will reflect any changes to the Operator's personal data processing policy. The policy is valid indefinitely until it is replaced by a new version. The new Privacy Policy comes into effect when it is posted on the Website, unless otherwise provided by the new version of the Privacy Policy.

The User can receive any clarifications on any issues related to the processing of their personal data by contacting the Operator via e-mail: [info@win2win.ru](mailto:info@win2win.ru) or by sending a letter to the address: 125130, Moscow, 11 Staropetrovsky pr., building 1, floor 4, room 6.

### **14.Final provisions**

The laws and regulations of the Russian Federation on personal data determine other rights and duties of the Operator pertaining to the processing of personal data.

Employees of the Operator who are in violation of the regulations on the processing and protection of personal data shall be financially or criminally liable, be subject to disciplinary, administrative or civil action in accordance with the procedure established by federal laws.

---

**WIN2WIN COMMUNICATIONS GROUP OF COMPANIES, LLC**

Legal address: 125130, Moscow, 11 Staropetrovsky pr., building 1, floor 4, room 6  
Factual address: 125130, Moscow, 11 Staropetrovsky pr., building 1, floor 4, office 409  
OGRN 5167746494670, TIN 7714966378, KPP 7714966378, Settlement account 40702810738000071324 in Sberbank PJSC  
Corr/acc 30101810400000000225, BIC 044525225