

# Personal Data Processing Policy of Geoscan Ltd.

This personal data processing policy (hereinafter referred to as “the Policy”) is drafted in accordance with Federal Law No.152-FZ “On the Personal Data”, dated July 27, 2006 and applies to all personal data of the Users, which the administration of Geoscan Ltd. (hereinafter referred to as “the Company”) may obtain during their use of any of the Company’s services, software, products or the website [sputnik.geoscan.aero](http://sputnik.geoscan.aero).

## 1. General definitions

1.1. For the purposes of this Policy the following general definitions are used:

1.1.1. Personal data privacy – the mandatory requirement for the Company or for any other person who has an access to a personal data to protect personal data from distributing to third parties without the User’s consent unless otherwise is provided by the Law of the Russian Federation.

1.1.2. Company – Geoscan Ltd. (Saint-Petersburg, st. Shatelena 26A, 1-H, 194021).

1.1.3. Personal data processing – any action (operation) or a combination of actions (operations), conducted with or without means of automation with regard to personal data, including collection, recording, arranging, cumulating, storing, refinement (updating, changing), extracting, using, transferring (distribution, submission, access), depersonification, blocking, deletion, and destruction of personal data.

1.1.4. Personal data – any information directly or indirectly related to a specific or specifiable individual (subject of personal data).

1.1.5. User – an individual who accesses contents and services of the Website/ an individual who buys (intends to buy) software or products of the Company.

1.1.6. Website – site of the Company [sputnik.geoscan.aero](http://sputnik.geoscan.aero).

1.1.7. Cookies – a small piece of information sent by a web server to be stored on the User’s computer as a file which is sent each time to the web server in the HTTP-request when the User tries to open the relevant page of the site.

## 2. General provisions

2.1. Usage of the Company's Website by User means his acceptance of this Policy and the terms of User data processing.

2.2. If the User does not agree to the Website usage Policy he must close the Website.

2.3. The Company does not control and is not responsible for third-party websites, which have links available on the Company's Website.

2.4. The company does not verify the authenticity of the personal data provided by the User on the Website.

## 3. Personal data subject

3.1. This Policy establishes the obligations of the Company not to disclose User's personal data and protect the Privacy of personal data, which is provided by User when he fills in an application form for getting an information about Company's products or places purchase orders.

3.2. Personal data which is allowed to be proceed within the framework of this Policy is provided by the User by filling in the registration forms on the Website, which may include the following information:

3.2.1. username;

3.2.2. phone number of a personal data User;

3.2.3. e-mail of a personal data User;

3.2.4. name of represented company.

3.3. In most web browsers cookies are enabled by default. Typically, the users can delete cookies and prohibit their use for various sites on their choice. Based on information stored in the cookies Google Analytics and Yandex.Metrica, the partners of the Company, count the statistics of visits, analyze and personalize advertisements. Cookies are intended to improve the work of the Website, make its use much more efficient and convenient. Cookies are used for the following purposes:

3.3.1. to assess the effectiveness of advertising campaigns;

3.3.2. to be able to analyze the popularity and attendance of the Website;

3.3.3. to be able to quickly adjust the Website's capabilities to the needs of visitors.

Information about the User's personal data processed by Google is available [here](#).

Information about the User's personal data processed by Yandex is available [here](#).

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

4.1. User's personal data can be used for following purposes:

4.1.1. Establishing a feedback with the User, including sending notifications, requests concerning the use of the Site, rendering services, getting and processing requests and applications from the User.

4.1.2. User identification for the purpose of placing an order and (or) entering into a sales contract.

4.1.3. Providing the User access to personalized services of the Website.

4.1.4. Confirmation of the authenticity and completeness of the personal data provided by the User.

4.1.5. Sending the User of the Website a notification about the status of the order, placed in online-store.

4.1.6. Providing the User an effective client and technical support in case of problems related to the use of the Website.

4.1.7. Providing the User with his consent product updates, special offers, information on prices, newsletters and other information on behalf of the Company or on behalf of the Company's partners.

4.1.8. Advertising after getting the User's consent.

4.1.9. Providing the User access to the websites, services and online-stores of the partners in order to obtain products, updates and services.

## **5. Methods and terms of personal data processing**

5.1. User personal data processing is being carried out without the term limitation by any lawful method, including the information systems of personal data with both using automated processing and without using it.

5.2. The User agrees that the Company has the right to transfer personal data to third parties like courier services, postal organizations, telecommunications operators solely for the purpose of fulfilling the User's order that was placed on the Website and also for delivering the order.

5.3. User Personal data can be distributed to the third parties authorized by legislation of Russian Federation only by decision of the authorities of Russian Federation.

5.4. When processing personal data, the Company must make the required legal, organizational and technical arrangements in order to protect personal data from unauthorized, illegal or random access, destruction, change, blocking, copying, submission, distribution and other unlawful actions by third parties.

5.5. The Company and the User take all the necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the User personal data.

## **6. Rights and obligations**

6.1. The User must:

6.1.1. Provide the information about the personal data necessary in order to use the Website.

6.1.2. Update, supplement the provided information about personal data in case of this information has changed.

6.2. The Company must:

6.2.1. To use the received data solely for the purposes mentioned in [p. 4.](#) of the Policy.

6.2.2. To guarantee that keeping data will remain confidential. Do not distribute the personal data without the User's consent and do not sale, exchange, publish or disclose in other possible ways the User personal data.

6.2.3. To take precautions to protect the User personal data in accordance with the procedure which is usually used to protect such information in the existing business practice.

6.2.4. To block personal data that is referred to the particular User since the moment of the request sent by the User, by his legal representative or by organization empowered to defend the personal data User's rights for the period of inspection; to block personal data if there some unauthentic information were revealed or illegal acts were made.

## **7. Constraints**

7.1. Using the Service, user not have right to:

7.1.1. Change initial view of a map.

7.1.2. Combine, supplement, modify, remove or hide logos that are displayed on the map. The logos should be fully and clearly visible, full or partial overlay of logos is prohibited.

7.1.3. To change decompile and/or modify the Service code.

7.1.4. Use the Service to create sites/application that violate Russian Federation law or other applicable law, the rights and legitimate interests of third parties.

7.1.5. In case of non-observance or partial non-observance of current rules, the Administration reserves the right to remove, suspend service for the user of the violated rule without prior notification.

## **8. Final provisions**

8.1. The Company reserves the right to amend this Policy without the consent of the User.

8.2. The new version of Privacy Policy comes into the force from the moment of its posting on the Website unless otherwise is provided by a new version of the Privacy Policy.

Approved on 31.05.17