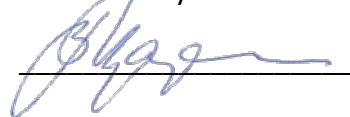


Approved by
General Director
Mallenom Systems LLC


_____/V.A.Tsarev/
October 01, 2017

Privacy and Data Protection Policy

Cherepovets

October 01, 2017

This Personal Data Protection Policy (hereinafter referred to as “Privacy Policy”) applies to all information that the website www.mallenom.com (hereinafter referred to as “Website”) collects about the User.

1. DEFINITION OF TERMS

1.1. The following terms are used in this Privacy Policy:

1.1.1. “Website Administration” — employees authorized to manage the Website, acting on behalf of Mallenom Systems LLC, organizing and (or) performing Personal Data processing.

1.1.2. “Personal Data” - any information directly or indirectly related to a specific or identified individual (personal data owner).

1.1.3. “Personal Data Processing” — any action (operation) or set of actions (operations) performed with Personal Data either using automation facilities or not using them, including collection, recording, systematization, accumulation, storage, specification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

1.1.4. “Confidentiality of Personal Data” — mandatory requirement for Mallenom Systems employee or other person who has access to Personal Data to prevent its distribution without the consent of the personal data owner or availability of other legal grounds.

1.1.5. “Website User” — a person who has access to the Website through Internet and uses the Website.

1.1.6. “IP-address” — is a unique network address of the node in a computer network, built using IP protocol.

2. GENERAL PROVISIONS

2.1. Use of the Website by the User means acceptance of this Privacy Policy and the terms of the User's Personal Data Processing.

2.2. In case of disagreement with the terms of the Privacy Policy, the User must stop using the Website.

2.3. This Privacy Policy applies only to the Website. Mallenom Systems LLC does not control and is not responsible for the websites of third parties, which the User can visit using the links available on the Website.

2.4. The Website Administration does not verify the authenticity of the Personal Data provided by the User of the Website.

3. PRIVACY POLICY SUBJECT

3.1. This Privacy Policy sets forth the obligations of the Website Administration not to disclose the Personal Data of the User and ensure data protection and confidentiality regime.

3.2. Personal Data authorized for processing under this Privacy Policy is provided by the User by filling out the feedback form on the Website and includes the following information:

3.2.1. Last name, name and patronymic of the User;

3.2.2. Contact phone number of the User; 3.2.3. E-mail of the User.

4. PURPOSE OF PERSONAL DATA COLLECTION

4.1. The Website Administration can use the User's Personal Data for the purposes of:

- identification of the User;
- establishing contact with the User as a potential customer;
- providing the User with effective technical support in the event of problems related to the use of the Website.

5. METHODS AND TERMS OF PERSONAL DATA PROCESSING

5.1. Processing of the User's Personal Data is carried out without any time limit, in any legal way, including in personal data information systems using automation facilities or not using automation facilities.

5.2. Personal Data of the User can be transferred to the authorized bodies of the government of the Russian Federation only on the grounds and in the order established by the legislation of the Russian Federation.

5.3. With the loss or disclosure of Personal Data, the Administration of the Website informs the User about the loss or disclosure of Personal Data.

5.4. The Website Administration takes necessary organizational and technical measures to protect the User's Personal Data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties.

5.5. The Website Administration together with the User takes all necessary measures to prevent losses or other negative consequences caused by loss or disclosure of the User's Personal Data.

6. OBLIGATIONS OF THE PARTIES

6.1. The User is obliged to:

6.1.1. provide information about the Personal Data required to use the Website.

6.1.2. update, supplement the provided information on Personal Data in case of changes.

6.2. The Website Administration is obliged to:

6.2.1. use the information received solely for the purposes specified in Clause 4 of this Privacy Policy.

6.2.2. ensure that confidential information is kept secret, not disclose it without prior written permission of the User, and also not sell, exchange, publish or disclose in any other way Personal Data of the User, except for Clause 5.2. of this Privacy Policy.

6.2.3. take precautionary measures to protect the confidentiality of the User's Personal Data in accordance with the procedure normally used to protect such information in the existing business practice.

6.2.4. block the Personal Data related to the relevant User from the moment of the request from the User or his legal representative or the authorized body for protection of rights of personal data owners for the verification period, in case of revealing invalid Personal Data or illegal actions.

7. LIABILITY OF THE PARTIES

7.1. In the event of the Website Administration fails to fulfil its obligations, it is liable for losses incurred by the User in connection with the misuse of Personal Data in accordance with the legislation of the Russian Federation, with the exception of cases provided for in Paragraphs 5.2. and 7.2 of this Privacy Policy.

7.2. In case of loss or disclosure of confidential Information, the Website Administration is not responsible if this confidential information:

7.2.1. became public property before its loss or disclosure.

7.2.2. was disclosed with the consent of the User.

8. DISPUTE RESOLUTION

8.1. Before filing a court complaint for disputes arising from the relationship between the User of the Website and the Website Administration, it is mandatory to file a claim (a written proposal for the voluntary settlement of the dispute).

8.2. The receiver of the claim shall notify the applicant in writing within 30 calendar days from the date of receipt of the claim about the results of the examination of the claim.

8.3. If the agreement is not reached, the dispute will be referred to the judicial authority in accordance with the current legislation of the Russian Federation.

8.4. The current legislation of the Russian Federation applies to this Privacy Policy and the relationship between the User and the Website Administration.

9. ADDITIONAL CONDITIONS

9.1. The Website Administration has the right to make changes to this Privacy Policy without the consent of the User.

9.2. The new Privacy Policy comes into effect from the moment it is posted on the Website, unless otherwise provided for in the new edition of the Privacy Policy.

9.4. The current Privacy Policy is available at: http://www.mallenom.com/Privacy_Policy_ENG.pdf