

# privacy policy and personal data protection

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This Policy contains information about personal data that is collected or generated (processed) when you use Devino Telecom services, for example, a website.

This Policy contains information on the types of personal data that are collected when you use Devino Telecom services, as well as the use, transfer and protection of your personal data. Also, the Policy explains the options available to you regarding your personal data and how you can contact us.

## general provisions

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Service Devino Telecom is a hardware-software complex, available for remote use through the Devino Telecom website. The service provides you with the opportunity to send SMS, IM, Email messages and other types of personal communication to the recipient, who has expressed his consent to receive these messages from you.

To get full access to the personalized functions of our service, you need to register in our system, providing us with complete and reliable information about yourself. The result of registration will be a virtual Personal Account created in Devino Telecom service, through which you will use our service and consume services.

Using Devino Telecom services, you agree to the terms of this Policy and grant Devino Telecom the right to receive, store, process and use Personal Data and other information that Devino Telecom receives in the course of your use of the services of our company in accordance with this Privacy Policy.

Devino Telecom does not collect information about persons who have not reached the age of 13 and in connection with this you are prohibited from using any Personal, Information and other data of such persons within the Service.

## what personal data do we collect and in what cases?

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You may be provided with certain personal data to provide you with the services, products and services you request. For example, when you contact our customer service, send requests for messages, create an account (account), participate in our events and competitions, or interact with our site or use our services. Such personal data include:

- Contact information, including name, surname, name and report, e-mail address, phone number;
- Information about authorization and account, including user name, password and unique user ID;
- Personal settings, as well as settings for displaying ads and using cookies.

## why and how we use (process) your personal data?

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We use the personal data you received from us as follows:

### **To provide the functions of the site and the services that you request**

When you work with our services we use your data to provide the services you have chosen. For example, if you take part in an event or an advertising event, we use the contact information provided by you to communicate with you regarding participation in the event or promotion. If you contact our customer service departments, we use information about you, for example your name, to help you solve a problem or situation.

### **To transmit information about our products, services, events and other advertising purposes**

To change your subscriptions (sent by e-mail or sms) or refuse to receive messages from Devino Telecom, please contact us by phone or mail [info@devinotele.com](mailto:info@devinotele.com), listed in the Contacts section on the site.

If you are an active client of the company, we can use the provided email address and telephone number to send you promotional messages about similar products and services of Devino Telecom, if you previously

granted us such consent when registering on the site, using our services or otherwise, and you have not given up mailings. In other cases, we ask you for permission to send advertising information about products, services, events and promotions.

We are entitled to use the information you provide to us, as well as information obtained with regard to other Devino Telecom products and services, for example, the statistics of your use of the site, participation in Devino Telecom activities to personalize the messages you send to us about products and services that may be of interest to you. If law requires this we also undertake to ask you for permission to send advertising messages.

#### **To maintain, improve and support activities, products and services (services)**

We can use the data you provide in your activities. For example, when you make a purchase, we are entitled to use the relevant information for accounting, auditing and other internal purposes. Another example: we can use data on how you use our products and services to improve the process of your interaction with Devino Telecom, as well as to identify technical and service problems and administer the site and services.

#### **To protect the rights and property of Devino Telecom and others and to ensure their safety**

We also have the right to use data on how you use the site and services to prevent or detect fraud, abuse, misuse and violation of the rights and legitimate interests of Devino Telecom, as well as to ensure compliance with the requirements of judicial acts, government agencies, or applicable law.

#### **For general research and analysis**

We use data on how our visitors use the site and services of Devino Telecom to better understand the behavior and preferences of customers. For example, thanks to the information on the process and the search results of visitors to the Devino Telecom website, we can better understand how to organize and present the services of our company in an optimal way.

#### **HR-activity and compliance with labor law**

We use the data provided by candidates for work in our company, when considering their candidacies and deciding on cooperation with them. This can be a surname, name and patronymic, as well as contact information contained in the candidate's summary.

We also work with the personal data of our employees in order to comply with the norms of tax, pension and labor legislation. The processing of personal data in this area is carried out for the purposes of calculating and calculating wages, organizing travel arrangements, adherence to the access regime and recording working hours, issuing powers of attorney for voluntary life insurance and other matters.

#### **Other purposes**

We can also use your personal data for other purposes, and in such cases, at the time we collect the information, we will send you a special notice, and if necessary, ask for your consent.

## **transfer of your personal data to other persons**

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Devino Telecom transfers your personal data to the following persons:

- Affiliates of Devino Telecom for the purposes and under the conditions described above
- Third-party service providers that process personal data on behalf of Devino Telecom, for example, for processing credit card data and payments, shipping and delivery, managing our databases and supporting them, sending emails, researching and analyzing, managing brand and advertising products, and also for the administration of individual services and functions.
- To other third parties in the amount necessary to: (i) comply with the requirements of government agencies, judicial acts or applicable law; (ii) prevention of the illegal use of our sites and services or violations of the terms of use of our services, as well as our regulations; (iii) our protection against claims of third parties; and (iv) assisting in preventing fraud or conducting investigative activities (for example, in the case of manufacturing counterfeit products).

We also have the right to transfer your personal data in the event of full or partial sale or transfer of our business or assets (including in the case of reorganization, spin-off, termination or liquidation).

# protecting and managing your personal data

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## Encryption and Security

We apply a number of technical and organizational security measures, including encryption and authentication tools, to ensure the security of your personal data. Your personal data is stored in secure networks, and only a limited number of persons with special access rights to these systems have access to them.

## Territory of processing

The storage of personal data that we collect or generate (process) within the functioning of our sites and services is carried out in the Russian Federation.

## The period of storage of your data

Except where otherwise provided by law, we will keep your personal data for the entire time necessary to achieve the purposes for which we collect them.

## Your rights regarding your personal data

You have the right to demand:

- providing access to your personal data;
- Adjustments to your personal data if they are incomplete or contain inaccuracies;
- Remove your personal data. You also have the right to object to the use of your personal data, referring to the legal grounds relevant to your situation. If we have obtained your consent to the processing of your personal data, you may at any time withdraw such consent. You also have the right to object to the processing of your personal data, including prohibiting their use for the purposes of direct promotion.

## cookies

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When you use the site, Devino Telecom receives from your browser and records information that may include personal data. We use a number of methods, such as cookies, to collect such information, which may include your (i) IP address (Internet protocol address); (ii) unique identifier for cookies; the information of cookies and information on whether there is software on your device for accessing certain functions; (iii) a unique device identifier and device type; (iv) domain, browser type and language; (v) the operating system and system settings; (vi) country and time zone; (vii) previously visited websites; (viii) information about your interaction with our site, such as mouse clicks; and (ix) access time and URL (Internet page address) of the request source.

We use cookies to obtain statistics on the use of the site, as well as to understand the preferences of our customers. This allows us to provide customers with services and improve the convenience of their work on the Internet. To improve the performance of our site, we also use cookies to collect aggregate traffic data and interact with the site, to identify trends and obtain statistics. In general, the site uses three categories of cookies:

**Functional:** Such cookies are required to provide basic functionality of the site and are therefore always included. This category includes cookies that allow you to remember while you browse our site in one session or from session to session, depending on your request. They also help in the implementation of security measures and compliance with regulations.

**Operational:** Such cookies allow us to improve the functionality of the site by collecting statistics on their use. In some cases, these cookies increase the speed of processing your requests and allow us to remember the site settings you have chosen. Refusal to use such cookies may lead to the fact that you will be offered incorrectly selected recommendations, and the work of the site will be slowed down.

You can choose to have your computer warn you whenever a cookie is sent, or disable cookies. This can be done through the browser settings in each browser and device that you use. All browsers differ slightly from each other. Go to the "Help" menu of your browser to find out the correct way to change cookie settings. If you disable cookies, some of our services will not function properly

## amendments to this policy

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Over time, the applicable law and our practice change, and therefore we can periodically make changes to this Policy. If we significantly change the procedure for processing personal data, we will send you a preliminary notification or, in the cases provided by law, we will send a request for your permission before implementing such changes. We strongly recommend that you familiarize yourself with the Policy and be aware of our practices.

## questions and feedback

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We are pleased with the questions, comments and comments on this Policy and the practice of protecting personal data. Also, you can contact us at any time with a request for clarification of the processing and protection of personal data in our company.

If you wish to leave your comments, or have any questions or comments, or you want to exercise your rights related to personal data, please contact us in any convenient way.

The current information about contact phones, e-mail addresses and correspondence receiving addresses is indicated in the Contacts section of our website.

## additional information

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The site of our company can contain links to other web resources, where useful and interesting information for users of the site can be found, for example, links to such social resources as: [www.facebook.com](http://www.facebook.com); [twitter.com](http://twitter.com); [vk.com](http://vk.com); [odnoklassniki.ru](http://odnoklassniki.ru); [www.youtube.com](http://www.youtube.com) and others. In this case, the effect of this Policy does not apply to such other sites. Users following links to other sites are advised to familiarize themselves with the policies on processing data posted on such sites.