

Privacy Policy

1. Who we are

- 1.1 We are IP MIRNYI ANDREI VIKTOROVICH ("Operator") located at SEVERNYI B-R, D. 6, KV./OF. 133, MOSCOW, RUSSIA. We are represented, for the purposes of this policy.
- 1.2 "This Privacy Policy sets out how we collect and use your personal information when you use our website www.neden-radeon.com ("Site and/or Website") and the choices available to you in connection with our use of your personal information (the Privacy Policy)."

2. This Privacy Policy

- 2.1 "By making available the Services we, acting reasonably and in good faith, believe that you are aware of and accept this Privacy Policy."

3. Information Collected

- 3.1 The data collected and processed by the Operator are not personal data and cannot be used for identification of any particular person.
- 3.2 When you visit the Site, we automatically collect certain information regarding technical devices, technical interaction with the Site:
 - 3.2.1 The host IP address;
 - 3.2.2 The type of device by which the user has logged in to the site;
 - 3.2.3 The browser type, its version and language;
 - 3.2.4 The type of operating system and its version;
 - 3.2.5 The user's activity on the site;
 - 3.2.6 The number and frequency of the site visits;
 - 3.2.7 Cookies;
 - 3.2.8 Date and time of visiting;
 - 3.2.9 Time zone;
 - 3.2.10 The unique user IDs that are assigned automatically;
 - 3.2.11 Users' navigation (the path) on the website (the Users' order of opened pages of the Website);
 - 3.2.12 Data on the location (geographic position);
 - 3.2.13 The Internet provider.

We refer to this automatically-collected information as "Device Information". By accepting this privacy Policy, the User agrees to the Operator to receive and process the following types of User's data.
- 3.3 By accepting the terms of this privacy Policy, the User gives the Operator consent to the collection, processing, systematization, analysis, elimination of the data specified in paragraphs 3.2.1-3.2.13 of this privacy Policy.
- 3.4 The sources of the data collection referred to in paragraphs 3.2.1-3.2.13 are provided by Google Analytics and Yandex.Metrica. We collect the Device Information **only by** using the Google Analytics and Yandex.Metrica.
- 3.5 The Operator collects and processes the Users' data in consideration of the privacy Policy adopted by the group of companies "Google Inc" and in consideration of the privacy Policy adopted by the group of companies "Yandex".
- 3.6 Google Analytics and Yandex.Metrica
 - 3.6.1 This website uses Google Analytics, a web analytics service of Google Inc. ("Google"), and Yandex.Metrica, a web analytics service of Yandex llc. ("Yandex"). Google Analytics and Yandex.Metrica uses "cookies". Cookies are data files that are placed on your device or computer and often include an anonymous unique

identifier. For more information about cookies, and how to disable cookies, visit <http://www.allaboutcookies.org>. The information generated by the cookie about your use of this website will usually be transmitted to and stored by Google on a server in the United States and to and stored by Yandex on a server in the Russian Federation. Only in exceptional cases is the full IP address transmitted to Google servers in the United States and then shortened. On behalf of the operator of this website, Google and Yandex will use this information to evaluate your utilization of the website, to prepare reports about the activities on the website and to provide additional services to the operator of the website related to the utilization of the website and the use of the Internet.

- 3.6.2 You may refuse the storage of cookies by selecting the appropriate settings on your browser. You may also prevent the collection of the data referring to you that are generated by the cookie (including your IP address) in relation to the use of the Website and the subsequent transfer to Google and the processing of these data by Google by downloading and installing the browser plug-in available at the following link <https://tools.google.com/dlpage/gaoptout/>. In this case, an opt-out cookie is stored which prevents the future collection of your data when you visit the website.
- 3.6.3 Further information provided by Google on terms and conditions of use as well as on data protection can be found under:
<http://www.google.com/intl/en/policies/privacy/index.html>
- 3.6.4 Further information provided by Yandex on terms and conditions of use as well as on data protection can be found under:
https://yandex.com/legal/metrica_eea_termsfuse/
- 3.7 We use the Device Information that we collect to help us screen for potential risk and fraud (in particular, your IP address), and more generally to improve and optimize our Site (for example, by generating analytics about how our customers browse and interact with the Site).
- 3.8 The Operator does not collect and/or process any information about the Users' bank cards or bank accounts.

4. How do I reject cookies?

- 4.1 At any time, you can prevent cookies from being set on your browser. For instructions on how to block, delete or disable any cookies, please consult your browser's 'Help' or 'Support' section. Please note that by deleting our cookies or disabling future cookies you may not be able to access certain areas or features of our website.
- 4.2 Please consult the following links for information on cookie management and blocking according to your browser:
 - 4.2.1 Explorer: <http://windows.microsoft.com/en-gb/internet-explorer/delete-manage-cookies#ie=ie-11>.
 - 4.2.2 Firefox: <https://support.mozilla.org/en-US/kb/enable-and-disable-cookies-website-preferences>
 - 4.2.3 Chrome: <https://support.google.com/chrome/answer/95647?hl=en>
 - 4.2.4 Safari: https://support.apple.com/kb/PH19214?locale=en_GB
- 4.3 You can find general information and opt-out resources at youronlinechoices.eu.

5. "We use the information we collect from you for the purposes of:

- a. Providing you with an appropriate reply to your request;
- b. Protecting the rights and interests of Operator and others.

- 5.1 We process your data for the purposes identified above, as necessary, (1) for the legitimate interests of us and other third parties, including maintaining and administrating the Services; (2) to comply with our legal obligations;
- 5.2 "Your personal information may also be processed if it is required by a law enforcement or regulatory authority, body or agency or in the defence or exercise of legal claims. We will not delete personal information if it is relevant to an investigation or a dispute. It will continue to be stored until those issues are fully resolved and/or during the term that is required and/or permissible under applicable/relevant law."
- 5.3 If we intend to further process your data for any other purpose to those set out in this Privacy Policy, we shall provide you with details of this further purpose before we commence processing.

6. Data sharing

- 6.1 "We may share your personal information with companies, organisations and individuals inside and outside of the Operator where one of the following circumstances applies:
- c. to other companies in our group, for administrative and management, subject to us taking reasonable measures to ensure that your information is kept secure at all times;
 - d. to trusted third parties businesses, or persons who perform services and process your personal information for us for the purposes listed above, based on our instructions, subject to us taking reasonable measures to ensure that your information is kept secure at all times;
 - e. to companies, organisations or individuals outside of Operator if we have a belief in good faith that access, use, preservation or disclosure of the information is reasonably necessary to: o meet any applicable law, regulation, legal process or enforceable governmental request; o detect, prevent or otherwise address fraud, security or technical issues; or o protect against harm to the rights, property or safety of the Operator, our customers or the public, as required or permitted by law."
- 6.2 We may share your data other our affiliates. Sometimes we may also need to share your data with a third party in order to provide our services to you or to administer the Site, for example if you choose to share your data across other social media platforms.

7. International Transfers

- 7.1 We may transfer and maintain on our servers or databases some of your personal information outside the European Economic Area (EEA) including in Russian Federation.
- 7.2 The countries to which we transfer your data may not have the same data protection laws as your jurisdiction. We take reasonable cyber security measures and/or put in place the Standard Contractual Clauses (e.g. Model Clauses, Data Processing Agreement/Addendum) to ensure your data is adequately protected.

8. Your Rights

- 8.1 The users have the right to control the confidentiality of the data processed through the Site and contact the Operator with requirements, proposals, other messages by using the details specified in this Policy.
- 8.2 "You have the following rights, in certain circumstances, in relation to your personal information:

- (a) Right to access your personal information.
- (b) Right to rectify your personal information: you can request that we update, block or delete your personal data, if the data is incomplete, outdated, incorrect, unlawfully received or no longer relevant for the purpose of processing.
- (c) Right to restrict the use of your personal information.
- (d) Right to request that your personal information is erased.
- (e) Right to object to processing of your personal information.
- (f) Right to data portability (in certain specific circumstances).
- (g) Right not to be subject to an automated decision.
- (h) Right to lodge a complaint with a supervisory authority. "

8.3 If you would like to exercise these rights, please contact Support Service at hello@esagency.com. We will aim to respond to you within 30 days from receipt of request. We will need to verify your identity before we are able to disclose any personal data to you.

9. Security Measures

- 9.1 We take technical, organizational and legal measures, including, where suitable, encryption, to ensure that your personal data are protected from unauthorized or accidental access, deletion, modification, blocking, copying and dissemination.
- 9.2 The Operator does not provide the delivery or sale of the goods depicted on the Website. All the content depicted on the Website is provided for informational purposes only. The user expresses the will to transit to the web pages of any off-site online stores and sites by clicking the button with link, for example, "buy now".
- 9.3 The privacy policy of any off-site online stores and sites is determined by the owners of those domain names or persons who are granted the authority to administer the mentioned resources. The Operator takes no responsibility for the actions of the site administrators of any off-site online stores and resources.
- 9.4 The Operator does not collect the data, that in addition with the information on privacy Policy specified in paragraphs 3.2.1 – 3.2.13 can identify the personality of a particular User.

10. Changes to this Policy

- 10.1 From time to time, we may change and/or update this Privacy Policy. If this Privacy Policy changes in any way, we will post an updated version on this page. We recommend you regularly review this page to ensure that you are always aware of our information practices and any changes to such.

11. Contact Us

- 11.1 If you have any questions, please send your inquiries to Service support at hello@esagency.com or send your request to us, in writing to SEVERNYI B-R, D. 6, KV./OF. 133, MOSCOW, RUSSIA. So we can deal with your enquiry effectively, please quote this Privacy Policy. We will aim to respond to you within 30 days from receipt of request.
- 11.2 All correspondence received by us from you is classified as restricted-access information and may not be disclosed without your written consent. The personal data and other information about you may not be used without your consent for any purpose other than for response to the inquiry, except as expressly provided by law.