

Biznes Nedvizhimost JSC

The current Privacy Policy (hereafter - the Policy) sets out the process of collection and protection of any user's personal information the Biznes Nedvizhimost JSC (hereafter - the Administrator) may collect while any User uses the Administrator's Service.

Prior to using the Service please make yourself familiar with the provisions of this Privacy Policy.

1. Main Provisions

- 1.1. Service – a Website, accessible on the World Wide Web at <http://officeless.ru>.
- 1.2. Administrator – the service administrator — JSC «Biznes-Nedvizhimost»
- 1.3. User — any person who has joined (authorized) this Policy for its own use or any person acting on the behalf of a registered company.
- 1.4. Personal Data - any information related directly or indirectly to an identified or an identifiable person (Personal Data Subject).
- 1.5. Personal Data Usage – any action (operation) or the set of actions (operations) conducted on personal data using automatization tools or without using such tools, including, but not limited to collection, recording, storage, refining (updating, changing), recovery, extraction, usage, transfer (distribution, granting access to), depersonalization, blockage, deletion, destruction of personal data.

2. General Terms

- 2.1. While Using the Service, the User hereby agrees to the following:
 - a. The user has read and become familiar with the provisions of this Privacy Policy in full prior to using the Service.
 - b. The beginning of usage of the Service by the User in any way or form amounts to the User agreeing to all provisions of this Privacy Policy without any limitations or omissions.
 - c. Should the User not agree with any provision of this Privacy Policy he or she should immediately stop any usage of the Service
 - d. The Privacy Policy (including any of its parts) can be modified by the Administrator at any time without any specific notice and without the payment of any compensation. The new version of the Privacy Policy comes into force at the time of its publication on the Administrator's website, deployed on the domain at <http://officeless.ru/>, unless otherwise stated in the latest version of the Privacy policy.
- 2.2. By accepting the provisions of this Privacy Policy the User states his agreement to the processing and storage of the User's data by the Administrator for the purposes stated in this Policy and to the transfer of data to any third party that falls under the cases listed in this Policy
- 2.3. As a general rule the Administrator does not check the authenticity of the personal data provided by the user. At the same time, in any case provided in the Terms of Use the User must provide the proof of authenticity of any personal data he or she has provided about themselves.
- 2.4. The Administrator having access to personal data ensures the confidentiality of the data as established by law.
- 2.5. The User's personal data is kept in the database for the duration of the Terms of Use agreement.

3. The Subject of the Privacy Policy

- 3.1. This Policy covers the following types of personal data:
 - 3.1.1. Any personal information provided by the User including information about themselves provided personally at the time of registration, any other personal information the User grants the Administrator the access to through websites or third party services or any personal information provided by the user while using components of the Service. Personal information gathered in such a manner can

include the User's name, telephone number, e-mail address or any other personal information provided in the comments section or in the attached files.

3.1.2. The provision of any third party's personal data without the third party's agreement to such distribution is forbidden, unless the third party data has been gathered by the User from publicly accessible sources.

3.1.3. Data automatically collected while using the Service using the software installed on the User's device including, but not limited to the User's IP-address, individual network device number (MAC-address, Device ID), electronic serial number (IMEI, MEID), Android advertising identification (Google ID), data from cookies, browser information, OS information, time of access, search engine queries, location services and the User's device's movements.

3.1.4. Any data additionally provided by the User at the Administrator's request for the purpose of fulfilling the Administrator's obligation to the User as to Service Provision.

3.2. The provided information is treated as personal data and is protected as such under the current legislation of the Russian Federation.

4. The Purposes for the User's Data Collection and the Processing of the User's Data

4.1. The Administrator collects and processes only the information relevant to fulfilling its obligation as a Service provider including any Personal Data.

4.2. The Administrator can use the User's personal data for the following purposes:

4.2.1. the identification of a party in any agreement between the Users and the Administrator,

4.2.2. the provision of any service to the User using the Service and the subsequent improvement and the development of new services,

4.2.3. responding to the User's requests to the support service, informing the Users of the Service's capabilities, sending queries regarding using the Service's,

4.2.4. implementing marketing goals, conducting statistical and other research, based on depersonalized data,

4.2.5. targeting advertising materials,

4.2.6. implementation of any agreements by the Administrator to provide cookies third parties for the implementation, by a third party, of activities leading to the showing of targeted advertising and informational materials to the Users and/or for the purpose of provision by a third party of any other services to the User as set out in the relevant legal provisions.

4.3. The User hereby declares his or her express agreement to the transfer of his or her personal data to the Administrator, third parties for the purposes set out in provision 4.2 of this Policy.

4.4. Should the need to use the User's personal data for a purpose not stated in this policy arise, the Administrator shall seek the Users' express agreement to do so.

5. User's Data Processing

5.1. The processing of the User's personal data is carried out without time limitations in any lawful way, including in personal data informational systems using automatization tools or without using such tools.

5.2. The User's personal data is stored in accordance with the current legislation.

5.3. The User's personal data shall not be transferred to a third party, except in the following cases:

5.3.1. The User has granted his or hers express agreement to such actions.

5.3.2. The transfer is required to maintain the functioning of the Service and/or individual functional capabilities of the Service, the implementation of partnerships or other programs of the Service.

5.3.3. The transfer is provided for by the applicable law

5.3.4. To maintain the opportunity for protection of the Administrator's and/or any third party's rights and lawful interests in the event that a User breaks the provisions of the Service's Terms of Use.

5.4. The User is hereby informed and agrees that the Administrator can receive a third party's personal data if such data is provided by the User while using the Service and to use the data to

realize individual functional capabilities of the Service, provided that the User guarantees the third party, whose data is being collected by the Administrator, has provided its consent for its data to be collected, processed and transferred in the events listed in this Policy.

5.5. The User is hereby informed and agrees that the Administrator may receive depersonalized (without a link to the User) statistical data concerning the User's actions while using the Service and the Service Setting the User has set up.

6. User's Rights

6.1. The users have a right to:

6.1.1. Upon request receive any information concerning the processing of their data from the Administrator.

7. Actions to protect the User's data

7.1. The administrator shall take the necessary and sufficient organizational and technical measures to protect the User's personal data from an unlawful or incidental access, manipulation, blockage, transfer, or any other unlawful action. Such measures include, in particular, an internal audit of the collection, storage and processing processes and any measures to ensure the data's physical security to prevent any unauthorized access to the systems where the personal data is stored.

7.2. While processing the User's personal data the Administrator is guided by the Federal Law "On Personal Data" dated 27.06.2006 № 152-FZ.

8. Final Provisions

8.1. The current Policy, any relationships between the User and the Administrator arising from this Policy and any questions not settled by the current policy are regulated by the current legislation of the Russian Federation.

8.2. The Users may address their requests, suggestion or questions to the Administrator via e-mail at info@officeless.ru at or via telephone at +7 (495) 508-66-66.

8.3. The current version of this Policy is posted on the Administrator's website and available on the World Wide Web at <http://officeless.ru/>

Last redacted on the «01» august 2021