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PRIVACY AND COOKIE POLICY a4lawfirm.ru

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Permanent links to current editions:

User Agreement a4lawfirm.ru (hereinafter - the Agreement):

<https://a4lawfirm.ru/user-agreement>

Privacy and Cookie Policy (this document is the annex to the Agreement):

<https://a4lawfirm.ru/privacy-policy>

This Privacy Policy (hereinafter referred to as the Policy) is designed to fulfill the requirements of Clause 2 Part 1 Article 18.1 of the Federal Law of 27.07.2006 № 152-FZ "On Personal Data" (hereinafter - Federal Law No. 152 (hereinafter referred to as the Federal Law No. 152), General Data Protection Regulation (GDPR), as well as federal laws and secondary regulation of the Russian Federation defining the cases and features of personal data processing, and determines how the Limited Liability Company A4 Law Firm (the "Company", the "Operator" or "we") collects, uses and distributes information about you obtained through the Company's online interfaces of the site located at <https://a4lawfirm.ru> (the "Site").

Before using the Site, please read the Policy carefully. By using any functions, services and options of the Site, including by browsing the Site pages, you claim that you have read, understood and agreed to be bound by the terms of this Policy, including all specific terms and conditions, without any exceptions or reservations.

This Policy is a part of User Agreement a4lawfirm.ru. We kindly ask you to read this Policy carefully and accept it by placing a in the box next to "I accept the terms of a4lawfirm.ru Privacy Policy" or its equivalent on the Site.

Any reference to "you", "your", etc. shall be interpreted as a reference to the User of the Site, the subject of of this Policy and Agreement.

PREAMBLE

- 1) This Policy is an integral part of the Agreement and applies to all Users of the Site (subjects of personal data collection);
- 2) The Company guarantees compliance with the privacy requirements of personal data under Art. 7 of Federal Law No. 152, as well as the adoption of measures provided by Part 2 of Art. 18.1, Part 1 of Art. 19 of Federal Law No. 152;
- 3) According to the requirements of Part 2 Art. 18.1 of the Federal Law No. 152, this Policy is published in free access in the Internet on the Company's Site;
- 4) The Company considers the main principle of its work is compliance and protection of its Users' interests. This principle is also reflected in the collection, storage, processing and transfer of Personal Data.
- 5) **Our mission** is to respect the interests of our Users and ensure the security working with Personal Data. For this purpose we have prepared our Policy in strict compliance with the principle of protecting the confidentiality of Personal Data.
- 6) **The purpose of this Policy** is to provide you with a full and transparent understanding of the legal framework for the collection and processing of your Personal Data; the categories of Personal Data we may collect about you; what happens to the Personal Data we collect; where we process your Personal Data; how long we store your Personal Data; to whom we may share your Personal Data; and explain your rights as a subject of Personal Data.

- 7) We periodically update this Policy and post any updates to our Site as they become available. Please check this Policy regularly on our Site for changes.
- 8) Please note that if you provide us with Personal Information of third parties by using the available functionality of the Site, you unconditionally and unreservedly warrant that you have obtained all necessary consents, permissions, etc. from such persons to implement this Policy in full. Providing Personal Data to third parties without complying with this warranty is unacceptable, and you fully accept all the consequences for breach of this warranty.
- 9) If you do not agree with the fact of providing us with your information, or using this information in other ways in accordance with this Policy and the Agreement, you should not become a User of the Site and Use the Site in any way.

TERMS AND DEFINITIONS

"Personal Data" – any information that relates to an identified or identifiable individual. An identifiable individual is a person who can be identified directly or indirectly, in particular by reference to identifiers such as name, identification number, location data, network identifier, or one or several factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that individual.

"Personal Data Operator" or **"Operator"** or **"Company"**: Limited Liability Company "A4 Law Company", E-mail: info@a4lawfirm.ru, TIN: 7743122080, OGRN: 1157746907130.

"Processing of Personal Data" – any action (operation) or set of actions (operations) performed with or without the use of means of automation Personal Data, including collection, recording, systematization, accumulation, storage, clarification (update, modification), extraction, use, transfer (distribution, providing access), depersonalization, blocking, deletion, destruction of Personal Data.

"Confidentiality of Personal Data" – mandatory for observance by the Operator or other person who obtained access to Personal Data, the requirement not to allow their distribution without the consent of the subject of Personal Data or other legal ground.

"Cookie" – a small text file placed by the Site on Your computer or device, when you, for example, visit certain sections of the Site and/or when You use certain features of the Site, which are governed by the Cookie Policy.

"GDPR" – EU General Data Protection Regulation 2016/679 of European Parliament and European Council of 27 April 2016 on the protection of persons with regard to the processing of their Personal Data and on the free movement of such data, repealing Directive 95/46/EU with Amendments, modifications and additions thereto, applicable from time to time and incorporated into the national legislation of the member states.

"User" – an individual who has performed Use of the Site and/or is using any Site's services, functions and/or features, who has accepted the terms of the Agreement and who is using the Site in accordance with the terms of the Agreement and its annexes.

"Site" – set of information, web forms, software and hardware, and objects of intellectual property (including, but not limited to, computer programs, databases, Site Content), access to which is provided from the User's devices by special software for web browsing (a browser) by a domain or (sub)domain (if there is a respective attribute):

a4lawfirm.ru (equal to [http\(s\)://a4lawfirm.ru](http(s)://a4lawfirm.ru), with/without using the abbreviation "www"), the exclusive rights and/or the right to use which are owned by the Company.

The terms and definitions used in the text of this Policy that are not defined in this section shall be understood in the meaning given to them by the Annexes, and then, in the generally accepted meaning.

1. Who is the person responsible for processing the data and who can I contact if I have any questions?

If you have any questions, including determining the person responsible for data processing, please send your question to our email: info@a4lawfirm.ru

2. What sources and types of data do we use?

We process Personal Data that we collect from You as part of an evolving relationship.

3. What types of Personal Data do we collect and for what purpose?

In this Section, we describe, step by step, what types of data we collect. There is a summary in the Policy describing all the types of Personal Data we collect, the relevant storage periods and grounds for processing.

a. Technical Data

Using the Site, the Company automatically collects Personal Data of Site Visitors. This data includes, for example, technical information such as Internet Protocol (IP) addresses used to connect Your computer to the Internet, log-in system, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform, information about Your visits of websites, etc. The terms of processing such data are further described in the Policy, in the Cookie processing Section.

b. Feedback Data

If the User sends messages to the Company through various communication channels (name, phone), the Company will have access to this User's data. This information is necessary to provide the User with a response or feedback.

Users may also indicate other information on the Site, including information that meets the characteristics of his Personal Data. It is not mandatory, however, by specifying in the field his Personal Data, the User gives the Company consent to process it.

In exceptional cases, the Company may collect other types of Personal Data. If need to process additional types of Personal Data, the Company undertakes to inform the relevant personal data subject about such processing and ensure that there is a legal ground for such processing (e.g., User consent).

If you object to the use and processing of your Personal Data for any purposes specified above, please contact us. Your decision to provide your Personal Information Company is voluntary, however, if you do not provide any information, the Company may not be able to take any action to comply with its obligations, to ensure the normal functioning of the Site.

c. Promotional materials

We may also use your email address or phone number to send out marketing materials. We add an unsubscribe link to each message we send you. We may include a link to unsubscribe from our mailing list in every email sent to you. If you unsubscribe, we will update our database and will no longer send you messages of this character. We may continue interaction with you to the extent necessary to provide the services you have requested.

Marketing

We may use a variety of marketing, statistical and technical tools for marketing. For the avoidance of doubt, giving your consent to the processing of Your data for marketing purposes You confirm that you have read and agree to the processing of your data for use of the following tools:

- **Facebook pixel** – Data Use Policy, located at <https://www.facebook.com/about/privacy>;
- **Google Analytics** – Google Analytics Terms of Use, located at <https://www.google.com/analytics/terms>;
- **Yandex.Metrica** – Yandex.Metrica Terms of Use, located at https://yandex.ru/legal/metrica_termsofuse;
- **Vk pixel** – Data Use Policy, located at <https://vk.com/privacy>;
- **Hotjar** – Data Use Policy, located at <https://www.hotjar.com/legal/policies/privacy>;
- **Google Ads** – Google Ads Terms of Use, located at <https://policies.google.com/technologies/ads>.

4. Why do we process your Personal Data (purpose of processing) and on what legal ground?

We process Personal Data in accordance with GDPR, Federal Law No. 152, and applicable local law:

a. in order to fulfill contractual obligations (Article 6 (1) (b) of GDPR)

The processing of Personal Data shall be carried out for the purpose of performing the obligations under contracts (Agreement) with Users or any actions necessary in advance to conclude contract.

b. for compliance with regulatory requirements (Article 6 (1) (c) of GDPR) or to protect public interest (Article 6 (1) (e) of the GDPR)

We are subject to various regulatory and supervisory requirements. Other processing purposes include identity verification, measures against fraudulent actions and money laundering, compliance with tax control obligations and reporting obligations, and for assessment and management the Company's risks.

c. for protection of legitimate interests (Article 6 (1) (f) of GDPR)

If necessary, we process your Personal Data beyond the measure for performance of obligations arising out of contracts, where such processing is necessary for protection our legitimate interests or interests of third parties.

d. on the basis of Your consent (Article 6 (1) (a) of GDPR)

To the extent that you have given your consent to the processing of Personal Data for certain purposes, the legitimacy of such processing arises from your consent. Any consent may be revoked at any time. Please remember that withdrawal of consent is valid for the future only. Any processing activities performed prior to such withdrawal are not affected by it.

Below is a table where You can find a summary of the information about the processing of Personal Data on the Site.

TYPE OF DATA	PURPOSE	STORAGE PERIOD	GROUNDS FOR PROCESSING
Name	Contacting You	48 hours	Your consent, Your actions on filing the feedback form on the Site
Phone number			
Email			

Regardless of how we process Personal Data, we receive the following data:

TYPE OF DATA	PURPOSE OF COLLECTION
Your IP address	Statistical and other research based on anonymized Personal Data
Cookie	Personalization your activity and behavior on the Site, and improving, upgrading and updating the Site.
Detailed data about Your behavior on the Site, including: time spent on the web pages; data on clicks on the links on the Site; data on the movement of the cursor or other pointer on web pages; data on scrolling of the web pages content	Maintain and analyze of the Site functionality, personalization of content and display contextual advertising

In order to provide you with access to the Site, we provide your Personal Information data:

To third-party support services and partners providing proper functioning of our services:

1) We use services such as GoogleAnalytics to analyze data and improve the Site, crash services that access Your actions that have led to certain analyzed consequences. For example, in the case of an unexpected error on the Site, we send report on your most recent actions to prevent a similar error from occurring in the future;

2) For sending You push notifications, we use auxiliary services, which accesses your data and sends you push notifications with your permission;

5. Who has access to your Personal Information?

We work with third-party partners who help us implement and improve our Site, so from time to time we need to provide them with information about our Users. Listed below are the main types of third parties to whom we disclose information:

1) Counterparties interacting with the Company in the course of the Company's fulfillment of its obligations under the Agreement.

2) The Company's Counterparties engaged in ongoing operational activity, such as, analytics and administration; note such data are transferred in depersonalized form;

3) Public authorities, in particular those of the executive branch, if there are The aforementioned purposes: as prescribed by law or upon request, for the legal legal protection of their legal interests in accordance with the applicable law. Service providers and partners shall only acquire access to data from us in compliance with the aforementioned purposes and our written instructions in accordance with the applicable regulations data protection.

6. Can Personal Data be transferred to other countries or international organizations?

We store your data on servers located in the Russian Federation and if You are a citizen of a member state of the European Economic Area, then in the European Economic Area.

However, certain service functions and requirements may require that we transfer your information to external service providers outside of specified territories. If these service providers operate in a country that does not provide an adequate level of protection within the meaning of the GDPR, for instance, in the United States, we use standard contractual clauses, rely on the European Commission's position in respect to certain countries, if applicable, and we undertake to obtain your prior consent for the transfer of data to other countries.

7. For how long is your Personal Information stored?

We process and store your Personal Data for as long as necessary for fulfilment of our contractual and statutory obligations. In this regard It should be noted that our relationship is presumed to be a continuing obligation for several years.

If the Personal Data are no longer necessary for the performance of our contractual obligations, they are generally subject to deletion if their further processing (within a limited period of time) is not required for special purposes.

In particular, the Company may retain special information after the performance of its contractual if it is necessary to comply with regulatory requirements, resolve disputes, prevent fraud or abuse, and to ensure compliance with provisions of this Policy. In other cases, Personal Data shall be retained for 12 months for analysis of User behavioral activity in anonymized form.

The data retention period may be extended for tax law compliance purposes.

We will stop processing your Personal Data if you object to such processing or if you withdraw your previously given consent to the processing.

8. What data protection rights do you have

In accordance with the laws of the Russian Federation relating to Personal Data and GDPR, you have a number of rights in respect to your Personal Data. You have the right to request access and correction of your Personal Data; if you have given your consent to Your Personal Data, you have the right to withdraw that consent at any time, such withdrawal, however, will not affect the legitimacy of the processing prior to withdrawal. The contents of the relevant rights are briefly explained:

8.1 The right to be informed

Art. 12-14 GDPR

You have the right to be informed about the collection and use of Your Personal Data, in particular, about purposes for processing of these data, retention periods for that Personal Data, and who it will be shared with. This information must be provided at the time we collect Personal Data from You. If we obtain Personal Data from other sources, we will inform You about this within a reasonable period of obtaining the data and no later than one month, unless You already have the information or if it would involve a disproportionate effort to provide it to You.

Information must be concise, transparent, understandable, easily accessible, and expressed in In clear and plain language, so Policy is explained in detail.

We will bring to your attention any new use of your Personal Data before we start processing it.

8.2 Right of access

Art. 15 GDPR

You have the right to obtain from the Company confirmation as to whether or not Personal Data concerning You are being processed, and, where that is the case, access to the Personal Data and the following information: the purposes of the processing; the categories of Personal Data concerned; the recipients or categories of recipient to whom the Personal Data have been or will be disclosed, in particular recipients in third countries or international organizations; where possible, the envisaged period for which the Personal data will be stored, or, if not possible, the criteria used to determine that period; the existence of the right to request from the controller rectification or erasure of Personal Data or restriction of processing of Personal Data concerning the data subject or to object to such processing; the right to lodge a complaint with a supervisory authority; the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of GDPR and, at least in those cases, meaningful information about the logic involved, as well as the significance and the envisaged consequences of such processing for the data subject.

If Personal Information is transferred to the third country or international organization, you have the right to be informed of guarantees available in connection with such transfer.

Upon request, the Operator will also provide you with a copy of the Personal Data being processed. For all additional copies requested by the subject of Personal Data, the Operator may charge a reasonable fee based on administrative costs. If you make your request by electronic means, and unless otherwise required, the information must be provided in generally accepted electronic form.

8.3 Right to Rectification

Art. 16 of GDPR

You have the right to have incorrect or inaccurate information regarding Personal Data on request for correction made verbally or in writing. The Operator has one calendar month to respond to the Personal Data subject's request.

8.4 Right to erasure ('right to be forgotten')

Art. 17 GDPR

The GDPR introduces a right for individuals to have Personal Data erased. You can make a request for erasure by contacting our Data Protection Officer, who has one month to respond to a request. Please take a note, the right is not absolute and only applies in certain circumstances, provided in Art. 17 GDPR.

8.5 Right to restriction of processing

Art. 18 GDPR

You have the right to request the restriction or suppression of your Personal Data. Where processing has been restricted, such Personal Data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defense of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest of the Union or of a Member State. Please take a note, the right is not absolute and only applies in certain circumstances, provided in Art. 18 GDPR.

8.6 Right to data portability

Art. 20 GDPR

The right to data portability allows you to obtain and reuse your Personal Data for your own purposes across different services. It allows you to move, copy or transfer Personal Data easily from one IT environment to another in a safe and secure way, without affecting its usability. Please take a note, you have the right to have the Personal data transmitted directly from one controller to another, where technically feasible.

8.7 Right to object

Art. 21 GDPR

You have the right to object, on grounds relating to your particular situation, at any time to processing of Personal Data concerning you. We will no longer process Your personal data unless we have legitimate grounds for the processing. You may revoke your consent to the processing of Personal Data at any time. Please be advised that the revocation will only take effect in the future. Any processing that was carried out prior to the revocation shall not be affected thereby.

8.8 Rights related to automated decision-making, including profiling

Art. 22 of GDPR

You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal consequences with respect to him or her or materially affects him or her.

Please note that this right is not absolute and applies only in certain circumstances provided for in Article 22 of GDPR.

You may revoke your consent to the processing of Personal Data at any time. Please be advised that the revocation will only take effect in the future. Any processing that was carried out prior to the revocation shall not be affected thereby.

9 Is it compulsory to provide my data?

As part of our relationship, you must provide Personal Data that is necessary to start a relationship between us and fulfill related contractual obligations or which we are required by law to collect. Generally, we will not be able to enter into any contract or perform any obligations under such contracts without such data.

10 Protection of your Personal Information

The Company takes precautions - including legal, organizational administrative, technical and physical - to ensure protection of your Personal Data In accordance with Art. 19 of Federal Law No. 152 and GDPR, in order to ensure protection of personal data of the User against unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other unlawful actions of third parties.

We take the confidentiality and protection of your Personal Data very seriously. We have implemented technical and organizational security measures designed to ensure that protection of data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure, unauthorized access and any other unlawful or unauthorized forms of processing is an integral part of the entire process of Personal Data processing in accordance with applicable law.

We do not disclose this information to third parties except with your consent, in accordance with the provisions of this Policy, or if we believe that such disclosure is necessary (when legitimate purpose: for example, in the case of a threat against you or others) under applicable law.

The measures applied by the Company to ensure the protection of Personal Data during its processing are planned and implemented for compliance with the requirements of Personal Data regulation and adopted in accordance with its legal acts.

Ensuring the protection of Personal Data is achieved by, in particular:

- 1) appointment of a person responsible for organisation of Personal Data processing;
- 2) development and implementation of local acts on the Personal Data processing;
- 3) determination of threats to protection of Personal Data during their processing in Personal Data Personal Data information systems;
- 4) application of organizational and technical measures to ensure Personal Data protection;
- 5) application of duly certified procedure of conformity assessment of information protection means;
- 6) accounting of electronic data carriers;
- 7) establishment of rules of access to Personal Data;
- 8) limitation of access to the premises where technical facilities that process Personal Data are located, as well as storage of data carriers;
- 9) detecting facts of unauthorized access to Personal Data, and taking measures to prevent such access;
- 10) inclusion of Personal Data (which are not publicly available and do not require confidentiality) to the list of confidential information of the Company;
- 11) obtaining an obligation not to disclose any confidential information, including Personal Data, from all Company's employees who are directly involved in Personal Data processing;
- 12) restoration of Personal Data, modified or destroyed as a result of unauthorized access to it;
- 13) familiarization of Company's employees, directly involved in the Personal Data processing, with the provisions of the legislation of the Russian Federation on Personal Data, including requirements to protection of Personal Data, local acts on Personal Data processing;
- 14) control over measures taken to ensure protection of Personal Data.

The internal control over compliance of Personal Data processing with the legislation and adopted in accordance with its regulatory acts is performed in accordance with the procedure set out in the Decree of the Government of the Russian Federation of November 1, 2012 № 1119 "On Approval of the Requirements for the protection of personal data at their processing in personal data" (hereinafter referred to as "DG No. 1119").

The Site may contain links to websites provided by third parties whose information and privacy practices differ from ours. We are not responsible for the information or privacy practices performed by these third parties. We encourage you to review privacy policies of all third party websites before using such websites or submitting any Personal Data or any other information on or through such websites.

11 Cookies

Unless otherwise provided for in the Policy in respect to confidentiality and Cookie, the Cookies we use are essential for the functionality and performance of the Site, for example by making the Site more efficient and easy to use functionality and services provided; these functional and/or operational cookies will be deleted from

your device when your browser session ends (cookies session). We will not use the information stored in the mandatory Cookies for any purpose other than as strictly necessary to provide You the services and functionality requested.

We may use cookies for different purposes and thereby improve your use of the Site, for example, by remembering your preferences on previous views of the Site, to use when you return to the Site in the future.

The Company uses cookies to personalize the features of the Site and possibly display appropriate advertising. The Company uses cookies and similar technologies, including mobile device identifiers, to identify you, to enhance your use of the Site, protection, and possibly display of advertisements.

When you first access the Site, We invite you to read and accept the Privacy and Cookie Policy. In doing so, we may ask you to choose, whether You agree to the processing of Cookies (except for necessary Cookies, without which the Site cannot function, you may choose not to process Cookies), and confirm your acceptance of the Policy. Continuing to use the Site, you agree to the placement of cookies in your browser and device in accordance with this Policy.

We use in-session and persistent tracking technologies. Tracking technologies (such as cookies) can be persistent (that is, they retain on your computer until you delete them) or temporary (i.e., they retain there until you close your browser).

Some of the Cookies we use are listed below. This list is not exhaustive, but gives an understanding of the main uses of cookies. When you visit the Site, the cookies described below may be installed on your device.

We may use both persistent and session cookies, as well as their types for the proper functioning of the Site:

Mandatory Cookies – are needed for the proper functioning of the Site. The Company may use mandatory Cookies to authenticate Users, prevent fraudulent use of the Site or provide specific features of the Site.

Analytical and Operational Cookies - allow the Company to recognize Users, and track their transitions to the Site, helping to improve the Site's performance.

Functional Cookies - are used to recognize repeated visits to the Site. They allow to personalize the content of the Site for Users, refer to them by name and save selected settings (e.g., language or region).

Targeting Cookies – track the process of how you use the Site, the pages you open and links used. The Company uses this information to make the Site and materials more convenient and tailor it to specific preferences. The Company may also share this information with third parties for this purpose.

Cookies may be used to:

- 1) Customize the content of the web pages of the Site in accordance with Users' preferences, and for the recognition of the User;
- 2) Creating statistics that help understand how visitors use the Site;
- 3) Maintaining a session of the User who has logged in to the Site, so that such Users do not have to re-enter their email and password on each web page Site.

11.1. ENABLE OR DISABLE COOKIES AND SIMILAR FUNCTIONS

You have the ability to accept or reject all cookies on all sites you visit, by changing the settings on your Internet browser. For example, when you use Internet Explorer version 11.0 you should do the following:

- 1) select "Settings," then " Browser Properties"

2) go to the "Privacy" tab;

3) using the mouse, select your preferred settings.

Each browser must use its own settings to modify and delete Cookies. Please note that certain functionality of the Site may be unavailable if you disable cookies. To learn more about how to adjust or change your browser settings, please see your browser's instructions or go to www.aboutcookies.org or www.allaboutcookies.org.

If you use different devices to access the Site (e.g., smartphone, tablet, computer, etc.), you should ensure that each browser on each device

If you use different devices to access the Site (e.g. a smartphone, tablet, computer, etc.), you should make sure that each browser on each device is customized to your preferences for cookies.

You should take care that each browser on each device is configured according to your preferences for cookies.

12 Can this Policy be changed?

If we change this Policy in any way, we will notify you and give you an opportunity to clarify whether You agree to the new terms of the Policy prior to further use of the Site.

13 Contact

If anything in the Policy is unclear to you, we will be happy to clarify its provisions.

If you have any questions concerning the processing of your data, you can contact the Company at e-mail: info@a4lawfirm.ru.