

# Privacy and personal data processing policy

## 1. General provisions

1.1 BaseALT LLC (hereinafter the "Operator") considers respect for the rights and freedoms of citizens to be one of the most important conditions for carrying out its activities.

1.2 The Operator's policy regarding the processing of personal data (hereinafter the "Policy") applies to all information that the Operator may receive about visitors to the [www.basealt.ru](http://www.basealt.ru) website (hereinafter the "Website"). Personal data is processed in accordance with Federal Law No. 152-FZ on Personal Data.

## 2. Key concepts used in the Policy:

2.1 "Website" means a set of graphic and informational materials, as well as computer programs and databases that ensure their availability on the Internet at the network address [www.basealt.ru](http://www.basealt.ru).

2.2 "User" means any visitor to the Website.

2.3 "Personal data" means any information relating to the User of the Website.

2.4 "Processing of personal data" means any actions with personal data performed with or without the use of a computer.

2.5 "Anonymization of personal data" means any actions that result in the impossibility to determine the belonging of personal data to a particular User or person without resorting to additional information.

2.6 "Dissemination of personal data" means any actions that result in the disclosure of personal data to an unspecified group of individuals.

2.7 "Provision of personal data" means any actions that result in the disclosure of personal data to a specified group of individuals.

2.8 "Destruction of personal data" means any actions that result in the irretrievable destruction of personal data on a computer or other media;

2.9 “Website Administration” means the authorized employees who organize and/or carry out the processing of personal data and who determine the purposes of the processing of personal data, the personal data subject to processing and the operations to be carried out with personal data.

### 3. Main provisions of the Privacy Policy

3.1 This Policy is an official document of the Website Administrator and establishes the procedure for processing and protecting information about individuals and legal entities using the Website.

3.2 The current version of the Privacy Policy, which is a public document, was developed by the Operator and is available to any Internet user. The Operator has the right to make changes to this Policy, informing the users by publishing the new version of the Privacy Policy on the Website.

3.3 The purpose of this Privacy Policy is to ensure that information about Users, including their personal data, is properly protected from unauthorized access and disclosure.

3.4 The relations associated with the collection, storage, dissemination and protection of information about Users are governed by this Policy and the current legislation of the Russian Federation.

3.5 By using the Website or the Website services, the User agrees to this Privacy Policy and the terms and conditions governing the processing of the User's personal data.

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

3.7 Personal and contact information of the Website Users will not be disclosed to third parties without their consent, except in cases established by the legislation of the Russian Federation.

3.8 The User shall independently determine the scope of personal information disclosed.

3.9 The Operator shall not verify the accuracy of the information received (collected) about Users.

#### 4. The Operator may process the following personal data of the User:

4.1 The personal data processed by the Operator includes: surname, first name, patronymic, telephone number, email address, professional field, place of work, group, and work role.

4.2. In addition, the Website collects and processes anonymized visitor data (including cookies) using Internet statistics services (Yandex Metric, Google Analytics and others).

4.3. Personal data provided by Users on the Website is not verified for accuracy.

#### 5. Purposes of personal data processing

5.1 The User's personal data, including surname, first name, patronymic, phone number and email address, is processed for the following purposes:

- to inform the User by sending emails;
- to grant the User access to services, information and/or materials contained on the Website and/or in the Operator's IT systems;
- to specify the details of the User's request;
- to improve the performance of the Website;
- to provide the User with access to personalized resources of the Website;
- to identify the User registered on the Website;
- to enable participation in events organized by the Website;
- to create a feedback loop with the User, including sending notifications and inquiries about the use of the Website and the Operator's products;
- to provide services to the User and to process requests and applications from the User;

- to provide efficient customer and technical support to the User.

The Operator has the right to send the User notifications about new products and services, special offers and various events. The User can unsubscribe from these informational messages at any time by emailing the Operator at [legal@basealt.ru](mailto:legal@basealt.ru) with the subject line "Opt-out of new product, service and special offer notifications".

5.2 Anonymized User data gathered via online statistical services is used to collect information about the activities of Users on the Website in order to improve the Website and its content.

## 6. Legal basis for the processing of personal data

6.1 The Operator shall only process the User's personal data upon its submission by the User via forms found on the Website or to email addresses under the Operator's domain (basealt.ru).

By submitting personal data to the Operator, the User agrees to this Policy.

6.2 The Operator shall only process anonymized User data submitted via forms on the Website when the User has authorized this through their browser settings (by having cookies and JavaScript enabled).

## 7. Procedures for the collection, storage, transmission and other types of processing of personal data

7.1 The Operator shall ensure the security of personal data and shall implement all reasonable measures to prevent access to personal data by unauthorized individuals.

7.2 Under no circumstances shall the User's personal data be transferred to third parties, except where such disclosure is mandated by applicable legislation.

7.3 If the User identifies any inaccuracies in their personal data, they can update it by sending a notification via email to the Operator at [legal@basealt.ru](mailto:legal@basealt.ru), with the subject line "Personal data update".

7.4 The processing of personal data may be carried out for an indefinite period of time. The User may withdraw their consent to the processing of personal data at any time by sending a notification to the Operator via email at [legal@basealt.ru](mailto:legal@basealt.ru), with the subject line "Withdrawal of consent to personal data processing".

## 8. Final provisions

8.1 The User is entitled to request clarification on any matters concerning the processing of their personal data by reaching out to the Operator through email.

8.2 Any changes to the Operator's personal data processing policy will be reflected in this document. Users may be notified of substantial changes by email to the address they provided.

8.3 The Website includes links that enable the User to access external websites. The Operator bears no responsibility for the content published on such external websites and provides these links solely for the User's convenience.

8.4 The current version of this Policy is publicly available online at [www.basealt.ru/en](http://www.basealt.ru/en).