



# Privacy Policy

## 1. General Provisions

**1.1.** This Privacy Policy relating to the processing of personal data users of the ESC LLC website (hereinafter referred to as the Policy) applies to all information and data that ESC LLC, located at: 105082, Moscow, Spartakovskaya Square, 14, Building 4, Room 1, TIN 9701082150 (hereinafter referred to as the Company), may obtain about subjects of personal data - users, clients, contractors (hereinafter referred to as the User) when they use or visit the Company's website <http://esc.group> (hereinafter referred to as the Site).

**ESC LLC hereby notifies the users of the Site that your use of the Site constitutes your unconditional acceptance of this Policy and the terms and conditions of processing of your personal data set forth herein.**

**If you do not agree with these terms,  
you should not use the ESC LLC website.**

**1.2.** The Policy defines the procedure for processing and measures to ensure the security of the personal data of the Users. This Policy does not apply to the processing of personal data of employees, applicants for vacant positions and other subjects of personal data not expressly mentioned in this Policy, as these relations are regulated by other local normative acts of the Company.

**1.3.** The current version of the Policy is permanently available on the Internet at <https://esc.group/privacy-policy/>. The Company has the right to make changes to the Policy from time to time in order to bring it into compliance with current legislation of the Russian Federation, as well as methods of processing and protecting personal data. If changes are made to this Policy, the Company will notify Users by publishing a new version of the Policy on the Website or, at its option, in case of material changes to the key terms of the Policy, by notifying Users by e-mail.

**1.4.** Personal data of the User (hereinafter referred to as "Personal Data") received and processed by the Company:

1.4.1. identification data means personal data (name, contact phone number, e-mail address, etc.) that the User provides about himself/herself when filling out the feedback form or the purchase order form on the Site. Other personal information is provided by the User at his/her own discretion;

1.4.2. technical data is personal data that is automatically transmitted to the Company in the course of its use by means of software installed on the User's device, including IP address, information about the User's browser (or other program used to access the Website), cookie information, access time, address of the requested page;

1.4.3. user data means personal data collected on the Site by web analytics services (geolocation, IP address, browser and device type and settings, operating system, mobile network (including operator name and phone number) and application version number.

**1.5.** The Company does not make any cross-border transfers of the User's personal data.

## 2. Purposes of collecting and processing Personal Data.

The Company has the following purposes for processing Personal Data:

| Item | Purposes of Personal Data processing   | Type of processed Personal Data      | Legal basis for the processing of Personal Data   |
|------|--|--------------------------------------|---|
| 2.1. | Processing of the request received from the user, communication with the user, including the sending of information to the user upon request, commercial offers, quotations, price lists. Identification of a party within the framework of contracts (contracts, agreements) concluded or entered into. | Identification data, technical data. | User Consent.<br>It is necessary to fulfill our legitimate interests (to respond to the user's requests, to sell goods to the user and to develop our business).<br>For fulfillment the terms of a contract (agreement) to which the user is a party, or to take the necessary steps prior to the conclusion of the contract at the user's request. |
| 2.2. | Ensuring the most efficient provision of content to the Site User.   | Identification data, technical data. | This is necessary for the Company's legitimate interests (keeping our Site up to date and relevant).  |
| 2.3. | Administration and protection of the Site, use of data analysis to optimize our Site and marketing.  | Technical data, user data.           | User Consent.<br>It is necessary for the Company's legitimate interests (as part of our efforts to secure our Site, to identify the types of customers for the goods we sell).  |

## 3. Ways and terms for processing Personal Data.

**3.1.** The Company processes Personal Data, in a mixed way: with or without the use of automated tools.

**3.2.** Actions with Personal Data, include: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, transfer (provision, access), blocking, deletion, destruction.

**3.3.** In processing Personal Data, the accuracy of the Personal Data, its adequacy and relevance to the purposes of the processing of Personal Data shall be ensured. If inaccurate or incomplete personal data is discovered, it may be clarified and updated. In cases where the updating of personal data is beyond the Company's responsibility, processing may be suspended until the updating is completed. Obligations and responsibilities for timely updating of Personal Data for individual cases of processing may be established by agreements or local acts of the Company.

**3.4.** Personal Data shall be processed from the moment of their receipt by the Company and shall be terminated:

- when the purposes of processing the Personal Data have been achieved;
- due to the lack of necessity to achieve the previously stated purposes of processing Personal Data;
- withdrawal of consent to the processing of personal data;
- in case of liquidation of the company as a legal entity.

**3.5.** The term of processing of the Personal Data specified in clause 2.1. of this Policy:

3.5.1. Personal Data of the User received from the purchase order form or feedback form - for the period necessary for providing information or concluding a contract (contract, agreement), but not more than 3 years from the date of receipt of the Personal Data;

3.5.2. Personal Data of the User who is a Party to the Contract (agreement) - during the period of delivery of goods or provision of services stipulated by the contract (contract, agreement) between the Company and the User, and 3 years after its termination, unless another period is stipulated by the current legislation.

**3.6.** The term of processing of Personal Data specified in Clauses 2.2. and 2.3. of this Policy is from the moment (time) of receipt (fixation of Personal Data) in information systems until the purpose of Personal Data processing is achieved.

#### **4. Procedure and terms of storage of Personal Data.**

**4.1.** The storage of Personal Data means the existence of records in information systems and on tangible media owned by the Company.

**4.2.** Personal Data of Users are processed and stored in information systems and on paper in the Company. Personal Data in electronic form are stored: in the Company's local computer network, in electronic folders and files in the PCs of employees authorized to process Users' Personal Data.

**4.3.** Personal Data may be stored for no longer than required for the purposes of processing, unless otherwise provided for by the federal laws of the Russian Federation.

**4.4.** The retention period for electronic and hard copy documents containing Personal Data, as well as documents related to their conclusion and execution is 3 years from the date of termination of the relationship between the User and the Company.

**4.5.** During the storage period, the Personal Data may not be destroyed.

**4.6.** Upon expiration of the retention period, the Personal Data shall be deleted in information systems without the possibility of their recovery and destroyed in hard copy in accordance with the procedure set forth in this Policy and the applicable laws of the Russian Federation.

#### **5. Procedure for destruction of Personal Data.**

**5.1.** Personal Data processed upon achievement of the purposes of processing or in case of loss of necessity to achieve these purposes, unless otherwise provided for by the federal law, shall be subject to destruction (deletion) when the following conditions occur:

5.1.1. achievement of the purposes of processing of Personal Data or the maximum retention period - within 10 (ten) days;

5.1.2. loss of necessity to achieve the purposes of processing Personal Data - within 10 (ten) days;

5.1.3. provision by the Personal Data User or his/her legal representative of confirmation that the Personal Data are illegally obtained or are not necessary for the stated purpose of processing - within 3 (three) days from the date of receipt of the User's or his/her representative's request;

5.1.4. impossibility to ensure lawfulness of processing of Personal Data - within 10 (ten) days;

5.1.5. revocation of the User's consent to the processing of Personal Data, if the personal data retention is no longer required for the purposes of Personal Data processing - within 10 (ten) days from the date of receipt of the User's or his/her representative's request;

5.1.6. expiration of the limitation period for legal relations within the framework of which the processing of Personal Data is being or has been carried out - within 30 (thirty) days;

5.1.7. liquidation (reorganization) of the Company in the absence of any legal successor - within the period provided for by law.

**5.2.** Destruction of Personal Data implies termination of any access to his personal data.

**5.3.** When destroying Personal Data, the Company's employees cannot access the User's personal data in information systems.

**5.4.** Paper documents containing Personal Data shall be destroyed upon destruction of Personal Data, personal data in information systems shall be deleted. Personal Data shall not be restored.

**5.5.** The operation of personal data destruction is irreversible.

**5.6.** The period after which the operation of destruction of the User's personal data is possible is determined by the end of the period specified in clause 4.6 of this Policy.

## **6. Transfer of Personal Data.**

**6.1.** The Company has the right to transfer Personal Data to third parties in the following cases:

6.1.1. the User has expressed his/her consent to such actions;

6.1.2. the transfer is necessary for the fulfillment of contracts, agreements for the supply (sale) of goods;

6.1.3. the transfer is stipulated by Russian or other applicable law within the framework of the procedure established by law;

6.1.4. such transfer occurs as part of a sale or other transfer of business (in whole or in part), with the transferee assuming all obligations to comply with the terms of this Policy with respect to the personal information received.

## **7. Measures applied by the Company to protect Personal Data.**

Our Company takes necessary and sufficient organizational and technical measures, including application by the Company of the latest anti-virus systems, to protect User's

personal data from illegal or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions with them by third parties.

## **8. Other Conditions**

**8.1.** This Policy applies only to the ESC Site. The Company does not control and is not responsible for third-party websites to which the User may go via links available on the Site, including in search results. On such sites other personal information may be collected or requested from the User, and other actions may be performed.

**8.2.** In general, ESC does not verify the accuracy of information provided by Users and does not monitor their legal capacity. However, Company assumes that the User provides true and sufficient information on the matters offered in the feedback form or in the purchase order form on the Site and keeps this information up to date.

**8.3.** The User may at any time change (update, supplement) the personal data or any part thereof provided by him/her in the feedback form or in the purchase order form on the Site by contacting the Company in any convenient way.

## **9. Amendments to the Policy. Applicable Law.**

**9.1.** The Company reserves the right to amend the Policy. If changes are made to the current edition, the date of the last update will be indicated. The new version of the Policy shall be effective from the date of its posting, unless the new version of the Policy provides otherwise. The current version is always available at <https://esc.group/privacy-policy/>.

**9.2.** This Policy and the relations between the User and Company arising from their application shall be governed by the laws of the Russian Federation.

## **10. Feedback. Questions and Suggestions.**

Any suggestions or questions regarding this Policy should be reported to the ESC User Support Service: info@esc.group, phone +7 (499) 110-50-08.

***Effective Date: May 13, 2024***

***Current version is available at <https://esc.group/privacy-policy/>.***