

Privacy Policy of the Portal and Platform «Rightech IoT Cloud (RIC)»

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Limited Liability Company «KOMNET», registered at the address: st. Rusakovskaya, b. f-8, premise XXI/31, Moscow 107140, hereinafter referred to as «Company», undertakes to maintain strict confidentiality and ensure the security of data provided by Users of the portal and platform «Rightech IoT Cloud (RIC)» (hereinafter - «Users»). Pursuant thereto, this Privacy Policy (the «Policy») outlines the Company's Privacy Principles and Ways to Use the «Rightech IoT Cloud (RIC)» Portal and Platform (the «Portal and Platform»).

This present Privacy Policy, in conjunction with the «Rightech IoT Cloud (RIC)» Portal and Platform Terms of Use, represents all terms and conditions governing the relationship between the parties regarding the use of the Portal and the Platform.

All terms and definitions not specified in the Policy are contained in the Terms of Use of the Portal and the Platform, respectively.

1. Grounds for Company's data processing when providing access to the Portal and Platform

1.1. Binding legally the terms of this Policy, as well as using the Portal and Platform, Users accept and agree to process their credentials and other data that become available to the Company in the course of their use of the Portal and Platform.

1.2. The Company processes the credentials, i.e. the information provided by the User when creating the Account of the User, as well as when editing the information specified in them, namely, the data in the fields of the completed questionnaire on the Portal and the Platform. If the User fails to provide the necessary information, this may prevent the User from accessing the Portal and Platform and obtaining the necessary services. The Company has the right, but is not obliged to verify the reliability of the information provided.

1.3. The Company processes other data related to the User, specifically data that become available to the Company during the User's interaction with the Portal and Platform, services of affiliates and/or partners, and includes data on technical means (devices) and methods of technological interaction with the Portal and Platform, services of affiliates and/or partners (including host IP address, Account operating system type, browser type, geographic location, provider data, etc.), about the activity of the User, as well as other data obtained by the specified methods. These data can be obtained using statistics services (for example, Yandex-Metric statistics, Google Analytics and others).

2. Data Processing Objectives when Company provides access to the Portal and Platform

2.1. In order to implement the Applicable Rules and provide access to the use of the Portal and Platform functionality, as well as to provide the User with services with the involvement of affiliates and partners of the Company, the Company explores, develops, optimizes and implements the new Portal and Platform functionality. (including services and products of informational, communication, advertising and other nature), and methods of notifying Users of such functionality, including with the participation of affiliates and partners.

2.2. In order to ensure the development of these purposes, the User agrees and instructs the Company to carry out processing in compliance with the applicable law. (including collection, recording, systematization, accumulation, storage, refinement, matching, retrieval, use, depersonalization, blocking, deletion and destruction) User's credentials and other data, including the results of automated processing of such data, including in the form of integer and/or text values and identifiers, their transfer to affiliates and/or partners in

fulfillment of such processing order, as well as collect (receiving) its credentials and other data from affiliates and/or partners.

3. Data processing terms when the Company grants access to the Portal and Platform

3.1. Data processing shall be performed within the period from the moment of registration of the User until the moment of termination of the Portal and Platform usage, unless otherwise specified by the Portal and Platform functionality and/or provided by Applicable Law.

3.2. The User may revoke his consent to processing the data by contacting the Company. Such data will be deleted by the Company within a reasonable period of time after the applicant has confirmed the ownership of the data specified in the relevant Account.

4. Rights of Users related to data processing when the Company provides access to the Portal and the Platform

4.1. The User may require processing restrictions, as well as deletion of credentials and other data that become available to the Company during the use of the Portal and Platform by said persons.

4.2. If the User considers that the credentials and other data that become available to the Company are incorrect or incomplete, then such User may log in to his account and make changes on his own.

In cases provided by applicable law, the User also holds other rights not specified above.

5. Transfer of Users data to third parties

In order to properly comply with the Applicable Rules, the Company shall take measures to ensure the safety of the Portal and the Platform. In order to achieve these objectives, the accounts and other data of Users may not be transferred to third parties, except for the existence of grounds to believe that the actions of Users violate the rights of third parties or the interests of the Company, as well as cases provided for by the applicable law, to the extent necessary to identify, investigate and suppress illegal actions.

6. Company's use of cookie files

6.1. Cookies are used by the Company to track information about the User. These files are small in size and are transmitted by the Company's web server through the User's web browser and stored on the hard drive of the User's computer.

6.2. The Company uses cookies to track page variations, to count clicks made by the User on a particular page variation, to monitor traffic and to measure the popularity of service settings. The Company uses this information to understand user preferences and to provide Users with relevant data and services.

7. Applicable law

The processing of the above data is carried out in accordance with the law of the Russian Federation.

8. Revised versions

8.1. The Company reserves the right to amend the Policy. It is the duty of the User to familiarize itself with the text of the Policy whenever contacting the Portal and the Company Platform.

8.2. The Company undertakes not to make any substantial changes, to impose additional burdens or restrictions on the rights of Users established by this Policy without proper notice. Relevant notices may be displayed on the Portal Website and Platform before such changes take effect, or may be sent to Users through alternative communication channels, for example, by e-mail if up-to-date contact details are available.

8.3. In case of non agreement with the terms of the Policy, the User shall not use the Portal and the Company Platform.

8.4. The new version of the Policy shall come into force the day after it is posted on the Company's Website at <https://rightech.io/>. Continuation of use of the Portal and the Company Platform after publication of the new version of the Policy means acceptance of the Policy and its terms by the User.