

## PRIVACY POLICY & COOKIES

### Overview

This Notice explains how the RUSSIAN CLASSICS DMC & PCO collects and processes your Personal Data. This document describes company's policy regarding personal information, ongoing communication, site security and overall site usage of [www.rusclassics.com](http://www.rusclassics.com).

“Personal Data” is any information that enables us to identify you, directly or indirectly, by reference to an identifier such as your name, identification number, location data, online identifier or one or more factors specific to your physical, physiological, genetic, mental, economic, cultural or social identity.

The information is used to fulfill requests you've made of us, such as e-mail updates and brochures by mail or to use special features of the site, such as RFP submissions. By voluntarily providing personal information, you are consenting to the collection and use of your personal information in accordance with the terms of this Privacy Policy.

By visiting of [www.rusclassics.com](http://www.rusclassics.com) you acknowledge that you have read and understood the processes and policies referred to in this Notice.

### Scope of this Policy

This Policy is intended to describe our practices with respect to the collection, use, and maintenance of personal information relating to users of our website or other services we provide.

For the purposes of this Policy, the term “Site” shall refer to [www.rusclassics.com](http://www.rusclassics.com). In this Policy, “personal information” means information relating to an identified or identifiable natural person. An identifiable person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier, or to one or more factors specific to his/her physical, physiological, genetic, mental, economic, cultural, or social identity. Personal information does not include aggregate information or de-identified information, meaning that the information can no longer be attributed to an identifiable natural person without the use of additional information.

Personal information is required for us to be able to provide the services to you. In addition, some of the services we provide require that we disclose your personal information to third parties, such as to companies that help us to provide our services. If you are not willing to provide your personal information and have it disclosed to third parties in accordance with this Policy, you will not be able to use our services.

Our Site may contain links to other websites that do not operate under this Policy. These third-party websites may independently solicit and collect personal information from you and, in some instances, provide us with information about your activities on those websites. We encourage you to review the privacy statements of all third-party websites you visit to understand their information practices.

While we strongly support the protection of privacy on the Internet, we do not have control over, and cannot be responsible for, the actions of other third parties. We encourage you to review

each such third party's privacy statement and understand its privacy practices before providing personal information directly to it.

## **Cookies**

When you interact with our Website, we may also collect limited non-personally identifying information that the browser you use makes available automatically. This information, or "cookie," may include the internet address of the computer or network you used to access our Website, the date, time, and page(s) you visited on our Website, the browser and operating system you used, and the referring webpage. The use of cookies is a standard practice among internet websites and most internet web browsers may be customized to reject cookies, to only accept or reject cookies by user intervention, or to delete cookies. However, some features of the Website may not function properly without cookies.

## **Personal Information We Collect**

We collect personal information to operate effectively and provide you with the best experience with our services. You provide some of this information directly, such as when you create an account, make a purchase, or contact us for support. We get some of your information, such as your IP address, by recording how you interact with our Site. We may also get information about you from our business partners or other third parties.

We may receive and collect certain personal information automatically, as outlined elsewhere in this Policy, and including analytics regarding our Site, information your Internet browser automatically sends when you visit our Site, and information collected by cookies and web beacons. We may collect personal information that can identify you such as your name and email address, and other information that does not identify you.

## **Information Provided by You**

We ask for and may collect personal information about you such as your name, address, e-mail address, birth date and telephone number. We also may request information about your interests and activities, your gender and age, and other demographic information.

When you contact us to request information, submit an RFP, we may ask you to provide, or confirm, personal information so that we can better serve you.

Our Site may provide you with the ability to enter (directly, or by authorizing us to download the information from a third party such as a social networking site or application) personal information such as contacts or lists of friends. These or related applications may also allow you to provide information directly to social networking sites including information about your purchases, physical location, or comments. If you sign up to receive promotional communications or notifications from us, we may ask you to provide personal information so that we can provide these to you.

## **How We Use Personal Information**

We use the personal information we collect for a variety of purposes. The legal basis for our Processing of personal information will depend on the specific context in which we collect it. We will retain personal information for as long as it is needed.

## **General Uses**

We may use information that we collect about you to:

- carry out our obligations arising from your business, or any other contract entered into between you and us and to provide you with the information, products and membership services that you request from us;
- organize events that you have purchased or registered for, and to provide you with information, and other materials, relating to the content of the event;
- to provide our newsletter and other publications, provided you have given your consent;
- perform research and analysis about your use of, or interest in, our services, or content, or products, services or content offered by others;
- to provide you, or permit selected third parties to provide you, with information about events, products or services we feel may interest you, provided you have given your consent;
- communicate with you by e-mail, telephone and/or mobile devices about products or services that may be of interest to you either from us or other third parties;
- develop and display content and advertising tailored to your interests on our site and other sites;
- verify your eligibility in connection with promotions;
- enforce our terms and conditions;
- manage our business and perform functions as otherwise described to you at the time of collection.

## **When we share and who can access your Personal Data**

We only transfer your Personal Data to trusted third-parties who provide sufficient guarantees in respect of the technical and organizational security measures governing the processing to be carried out and who can demonstrate a commitment to compliance with those measures.

We may share your Personal Data with:

- a member of our group;
- partners, suppliers and sub-contractors, for the performance of obligations arising from your membership, or any other contract we enter into with them or you or to provide you with the information, products and membership services that you request from us;
- in the event that we sell or buy any business or assets, in which case we will disclose your Personal Data to the prospective seller or buyer of such business or assets;
- if Russian Classics or substantially all of its assets are acquired by a third party, in which case Personal Data held by it about its customers will be one of the transferred assets.

We will never sell your Personal Data to third parties without your opt-in consent.

## **How Long we Store your Personal Data**

We will store your Personal Data, in a form which permits us to identify you, for no longer than is necessary for the purpose for which the Personal Data is processed. We may retain and use your Personal Data as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements and rights, or if it is not technically reasonably feasible to remove it. Consistent with these requirements, we will try to delete your Personal Data quickly upon request.

We will retain your information for as long as it's needed to provide you with our website. If you wish to no longer use your information to provide you service, contact us at [info@rusclassics.com](mailto:info@rusclassics.com). We will retain and use your information as necessary to comply with

our legal obligations, resolve disputes, and enforce our agreements. We maintain one or more databases to store your Personal Data and may keep such information indefinitely.

You have the right to ask us not to process your Personal Data for marketing purposes. We will usually inform you (before collecting your Personal Data) if we intend to use your Personal Data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your Personal Data. You can also exercise the right by contacting us using our contact information.

## **Security**

We exercise reasonable care to protect your non-public personal information. We follow generally accepted standards (including by taking physical, electronic and procedural measures) to protect the personal information provided to us.

While we are focused on the security of your personal information and follow strict standards, processes and procedures that are designed to protect your personal information, you must remember that the Internet is a global communications vehicle open to threats, viruses and intrusions from others and so we cannot promise, and you should not expect, that we will be able to protect your personal information at all times and in all circumstances.

## **Contact Us**

If you have any questions about this Policy or our privacy practices, please contact us by e-mail [info@rusclassics.com](mailto:info@rusclassics.com) or postal address as follows: 192029, Obuhovsky oborony pr.86, St. Petersburg, Russia.