

PRIVACY POLICY

Data Processing Policy

The Confidentiality Policy/ Data Processing Policy (hereinafter, the Policy) shall apply to all information that SOK Group LLC (hereinafter, the Company, INN (taxpayer identification number: 9709011739, OGRN (primary state registration number): 5177746009821), may receive concerning the User while the User makes use of the Website (the Service) and while the Company fulfills any agreements and contracts with the User.

The use of the Company's Services shall imply the User's unconditional consent to this Policy and its personal information processing conditions as specified herein; if the User disagrees to these conditions the User shall refrain from using the Services.

1. General Terms and Conditions

1.1. This Policy is posted and/or available on the Internet at: <https://sok.works/politics.pdf>.

1.2. Before use of the Company's Services, the User shall read this Confidentiality Policy.

1.3. The Use of the Company's Services (including Registration in the service, pressing the "Permit this website to process data" button or a similar button, which, in the sense of Articles 435 and 438, Russian Civil Code, constitutes the adoption (acceptance) of this Policy) means the User's unconditional consent to the terms and conditions specified in this Policy for the User's personal information processing and to cookie file receipt; if disagreeing with these conditions, the User must refrain from using the Services.

1.4. By entering into this Agreement, the User provides a termless, irrevocable written consent to any methods of its personal data processing, including any action (operation) or a set of actions (operations) entered into with or without the automation devices with personal data, including data collection, recording, arrangement, accumulation, storage, specification (updating, modification), extraction, use, transmission (dissemination, making available, access), depersonalization, locking, deletion and removal.

1.5. The User's personal data shall be processed in compliance with the Federal Personal Data Law No. 152-FZ dated July 27, 2006, and other regulations and laws on personal data protection.

1.6. The User's personal data pertaining to race, political views, religious and philosophical ideas, health status, sexual life, are neither received nor processed.

1.7. Proceeding from Clause 5, Part 1, Article 6, Federal Personal Data Law of the Russian Federation, the personal data processing is required to perform the contract where the personal data owner is either the beneficiary or guarantor hereunder, as well as to conclude the contract on the initiative of the personal data owner or the contract as per which the personal data owner will act as the beneficiary or guarantor.

2. The Users' personal information the Company processes

2.1. Using the Service, the Company collects information on Users automatically, in strict compliance with and following the Policy. The User agrees that the Administration may process several information types only:

2.1.1. Personal information, including that the User made available to the unlimited range of persons when the User got registered in social media websites. The information volume shall be provided by the User at the User's discretion, taking into account the settings of the social media platforms:

information published on your pages and in groups, information on the content publication: comments, audio and video records or pictures;

user's ID connected to the information in the public domain;

name and surname;

telephone number;

email address (login);

physical location;

date of birth; gender;

other information in the public domain.

2.1.2. Static and other depersonalized analytical information that is automatically transferred to the Service when the Website is used with the help of the software installed in the User's device, in particular, IP address, cookie file data, information on the User's browser (or another software application through which the Services are accessible), technical properties of the hardware and software used by the User, time and date of access to the Service, addresses of requested pages and other similar information. In addition, the data that identify the User's mobile device, its specific settings and properties, latitude/ longitude information.

3. Processing Goals

3.1. The Personal Information will be used by the Company for the following purposes only:

3.1.1. Entering into the Service Use Agreement;

3.1.2. Performance of obligations under contracts concluded with Partners, including provision of advertising information to the User;

3.1.3. Identification of the User's public data (data available to an unlimited range of persons) and use of this data, in particular, for various advertising purposes.

3.1.4. Conducting marketing, statistical and other research/inquiries based on publicly available data.

3.1.5. Identifying the User as part of discharging the obligations under the contracts concluded with the User.

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- 3.1.6. Provision of technical support in connection with the Service use
- 3.1.7. Use of depersonalized data for targeting of advertising and/or information content according to age, gender and other attributes;
- 3.1.8. The cookie files transmitted by the Company to the User's equipment and by the User's equipment to the Company may be used by the Company in provision of third parties' personalized Services to the User, for targeting of advertising, to facilitate data collection, on social media platforms the User interacts with.
- 3.2. The Company may store and transmit this information to third parties for the above mentioned purposes.

4. Procedure for information processing in social media platforms

- 4.1. The Company shall integrate with the social media platforms, such as:
Facebook (<https://www.facebook.com>)
ok.ru (<https://ok.ru/>)
vk.com (<https://www.vk.com/>),
MoyMir (<https://my.mail.ru/>)
Twitter (<http://twitter.com/>)

The list of websites is not exhaustive and may be modified at the Company's initiative.

4.2. The Company shall receive the User's public information via the application program interface (API) of the social media, according to this Confidentiality Policy and Part 10, Article 6, Federal Personal Data Law No. 152-FZ dated July 27, 2006.

4.3. The User agrees to the processing of information published on the social media website by taking concludent actions:

"by permitting the Company's applications to connect to these platforms"

4.4. Using its own Confidentiality settings in the Social Media, the User may limit the Company's access for management of the information display of such kind. The User shall examine the Confidentiality Policy of the respective social media on its own.

4.5. The Company may keep and use this information for the above mentioned purposes only.

5. Conditions of transfer to third parties

5.1. The User agrees that a certain part of the User's personal information is available to an unlimited range of persons and is not confidential.

5.2. The Company is entitled to transfer the User's personal data to third parties in the following cases:

5.2.1. The User consented to such actions, in particular, when the User applies the settings of the Service in use, which do not restrict disclosure to a certain range of persons;

5.2.2. When the User makes use of the Service, the User's personal information may be transferred to the Company's Partners (Suppliers) that provide services to the Users in order to facilitate the contract conclusion.

5.2.3. The transfer is envisaged in Russian and other applicable law as part of the statutory procedure;

5.3. Personal and depersonalized information shall be regarded as the Company's intangible asset. If the merger transactions or the asset sale transactions are concluded, the Personal Information may be transferred to the beneficiary (Partner) under the transaction.

5.4. Conditions for personal information transfer to third parties:

5.4.1. The Partners are bound by confidentiality agreements with the Company and are entitled to use the User's personal data for commercial purposes envisaged in this Policy.

5.4.2. The transmitted data may only include public information only.

6. Notices. Consent to receipt of electronic notices

6.1. The User hereby consents to the use of:

6.1.1. electronic devices for conclusion of this Agreement and provision of any notices hereunder, as well as

6.1.2. electronic records for storage of the information related hereto or the User's making user of the Website.

6.1.3. telephone, facsimile, mobile radio telephone communications, for receipt of advertising and information messages.

7. Limitation of liability

7.1. This Policy shall only apply to the information processed in the course of the use of the Service. The Company shall neither control nor be liable for the information processing by third parties' websites.

7.2. The Company does not check correctness of the personal information provided by the User and is unable to evaluate his/her legal competence. However, the Company presumes that the User provides correct and sufficient personal information and keeps it up-to-date.

7.3. The User realizes that the hardware and software used by the User to visit the websites may have the function of cookie file prohibition (for any websites or for certain websites) and of deletion of earlier received cookie files. The Company shall not be liable for the User's provision of access to the cookie files.

8. Personal Data Change and Removal Mandatory Data Storage

8.1. User's personal data are stored electronically.

8.2. The User shall be free to exercise the right to revoke its consent to its personal data processing by sending a deletion request to: support@sok.works Provided that the User agrees that the information removal may prevent from proper provision of services by Partners and from the Service use.

8.3. The rights specified in clauses 8.2. hereof may be limited in accordance with the requirements of the legislation. In particular, such limitations may specify the Company's obligation to keep the information altered or removed by the User for the period specified by the legislation and to transfer such information to authorities in accordance with the procedure specified by law.

9. Measures for Protection of the User's Personal Data

9.1. The Company takes all required and sufficient organizational and technical measures to protect the User's personal data from unauthorized or random access, removal, alteration, blocking, copying, distribution as well as other unauthorized actions by third parties.

9.2. The Company shall protect the personal data, unless the User implements the open information exchange with the unlimited number of persons in the Internet.

10. Privacy Policy Modification. Applicable Law

10.1. The Company shall be free to modify this Confidentiality Policy. When the Provision is amended, the last modification date is indicated in the current revision. A new version of the Policy shall take effect upon its posting in the Service.

10.2. This Policy and relationship between the User and the Company arising in connection with the Privacy Policy should be governed by the laws of the Russian Federation.