

Confidentiality policy for Advisor Media website users

Thank you for Advisor Media LLC visiting website and for taking the time to read this confidentiality policy. Advisor Media respects the privacy of all users of its website. Website users include corporations, companies, firms and private individuals.

This Confidentiality Policy explains how Advisor Media handles information collected as part of users' activities on the Website.

Website users are deemed to have read, accepted and recognized the validity of this Confidentiality Policy. Should a Website user not accept the terms of this Confidentiality Policy, he or she should stop using the Website. Even in those circumstances, the user remains obligated to submit Company Reports in accordance with applicable laws and regulations. Advisor Media may change this Confidentiality Policy at any time and without notice. Website users are asked to regularly review the Confidentiality Policy to check whether changes have been made. If they continue to use the Website after changes have been published, users are deemed to have accepted said changes to the Confidentiality Policy.

COLLECTION OF PERSONAL INFORMATION

In the course of operating the Website, Advisor Media may collect personal information and personal data about its users.

TERMS AND DEFINITIONS

"Personal information" is defined as information permitting the identification of private individuals, including their name, contact information, e-mail address, etc. Advisor Media will collect users' personal information when they provide it at the time of registration for an Advisor Media service, particularly when subscribing to a newsletter, downloading the information or placing a request via the Website. Advisor Media may also receive their personal information through its commercial partners or other third parties, provided those third parties confirm that the user authorized the disclosure of personal information.

"Personal Data" – any information relating to a directly or indirectly defined or identifiable User (the subject of personal data), which can be transmitted by the User using the Site.

"User" – An individual who is a user of the Site.

"Operator" – Advisor Media, which processes personal data of the User.

"Processing of personal data" – any action (operation) or a set of actions (operations) of the Operator performed with the use of automation means and (or) without the use of such means with personal data of the User, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data of the User.

"Automated processing of personal data" means processing of personal data by means of computer technology.

"Non-automated processing of personal data" means processing of personal data without the use of automation tools.

"Dissemination of personal data" – actions aimed at disclosure of personal data to an indefinite number of persons.

"Blocking of personal data" – temporary termination of processing of personal data of the User (except in cases where the processing is

necessary to clarify personal data).

"Destruction of personal data" – actions, as a result of which it becomes impossible to restore the content of personal data of the User in the information system of personal data and (or) as a result of which material media of personal data are destroyed;

"Trans-border transfer of personal data" means transfer of personal data to the territory of a foreign country to a foreign authority, foreign natural person or foreign legal entity.

"Information system of personal data" means a set of personal data contained in databases of personal data and information technologies and technical means ensuring its processing.

USE OF PERSONAL AND/OR CONFIDENTIAL INFORMATION

Advisor Media takes seriously its responsibility to properly handle personal and/or confidential information provided by everyone it deals with. Advisor Media limits the personal and confidential information collected to that necessary for conducting business.

Only Advisor Media personnel authorized to follow up on requests for information, verification and analyses have access to personal and/or confidential information. Advisor Media informs such employees about their obligation to maintain confidentiality.

Advisor Media may use personal and confidential information for the following purposes:

- a) To provide the services or information requested by the user, contact him or her in reply to a question, ensure quality assurance internally or manage the quality of information provided via the Website.
- b) To provide the user with the latest information and updates and

offer materials and training related to our activities. Such electronic messages are, however, sent out in accordance with anti-spam legislation, and the user may ask Advisor Media to remove his or her e-mail address from its distribution list at any time.

c) Advisor Media may also use personal and confidential information if it reasonably believes that such information may be relevant to an investigation into a violation of federal, provincial or foreign law, or to ensure the protection or defence of lawful interests.

d) Advisor Media may use confidential information in accordance with Advisor Media's Schedules of Contributions and the Conditions of Use of Advisor Media's Website and Reporting System, particularly to ensure the user's compliance with those terms.

Advisor Media keeps the personal and/or confidential information it collects for as long as deemed necessary to carry out its activities.

THE LEGAL BASIS FOR PROCESSING PERSONAL DATA

The operator processes the User's personal data in accordance with the following laws and regulations:

Civil Code of the Russian Federation,

Federal Law No. 149-FZ of 27.07.2006 "On Information, Information Technologies and the Protection of Information",

Federal Law No. 152-FZ of 27.07.2006 "On Personal Data",

Decree of the President of the Russian Federation dated March 6, 1997 No. 188 "On Approval of the List of Information of Confidential Nature",

Decree of the Government of the Russian Federation of November 1, 2012 № 1119 "On Approving the requirements for the protection of personal data during their processing in personal data information systems",

Decree of the Government of the Russian Federation dated 15.09.2008, № 687 "On Approval of the Regulations on the specifics of the processing of personal data carried out without the use of automation",

Order of FSTEC of Russia dated February 18, 2013 No. 21 "On approval of the composition and content of organizational and technical measures to ensure security of personal data during their processing in personal data information systems",

Order of Roskomnadzor No. 996 of September 05, 2013 "On Approval of Requirements and Methods for Depersonalization of Personal Data",

Order of the Federal Security Service of Russia No. 66 of February 9, 2005 "On Approval of the Regulations on the Development, Production, Implementation and Operation of Encryption (Cryptographic) Means of Information Protection",

Other normative legal acts of the Russian Federation.

**COMMUNICATION OF PERSONAL AND/OR CONFIDENTIAL
INFORMATION**

Advisor Media pledges not to publicly disclose, sell, rent or share personal and/or confidential information to any third party, including its members. Advisor Media will only disclose personal and/or confidential information to third parties in the following circumstances:

a) The user has specifically authorized Advisor Media to disclose personal information for a given purpose.

b) The third party involved is acting on Advisor Media's behalf as its agent or supplier of goods or services, and the information is provided to them for the sole purpose of facilitating the delivery of Advisor Media's services. These third parties must respect strict contractual conditions that require them to maintain the confidentiality of all information and to use such information for the sole purpose of delivering Advisor Media's services.

c) Disclosure is required to meet the requirements and facilitate the delivery of a specific Advisor Media service in accordance with applicable conditions, particularly legal obligations.

d) A lawful ruling rendered by a court, institution or relevant authority compels Advisor Media to provide personal information, summons Advisor Media to produce documents, or otherwise requires Advisor Media to disclose the information. Advisor Media also reserves the right to report to authorities any activity Advisor Media believes, in good faith, to be illegal. Advisor Media may disclose certain personal and/or confidential information when it believes that disclosure is necessary to protect its own rights, property and security as well as that of third parties, or to ensure the fulfilment of the user's obligations towards Advisor Media.

PRINCIPLES OF PERSONAL DATA PROCESSING

Processing of the User's personal data is carried out taking into account the need to protect the User's rights and freedoms, including the protection of the right to privacy, personal and family secrets, based on the following principles:

Processing of personal data shall be carried out on a lawful and fair basis.

Processing of personal data is limited to achieving specific, predetermined and legitimate purposes set out in this Policy.

Processing of personal data that is incompatible with the personal data collection purposes set forth in this Policy shall not be permitted.

Databases containing personal data that are being processed for purposes incompatible with each other shall not be combined.

Only personal data that meets the purposes of its processing shall be processed.

The content and scope of processed personal data correspond to the stated processing purposes and are not excessive in relation to the stated processing purposes.

When processing personal data, the accuracy of personal data, its sufficiency, and, if necessary, relevance in relation to the purpose of personal data processing shall be ensured.

Necessary measures shall be taken to delete or clarify incomplete or inaccurate data.

Personal data shall be stored in a form that allows you to identify the subject of personal data, no longer than required by the purposes of personal data processing, unless a different period of storage of personal data is not established by federal law or the contract (which party, beneficiary or guarantor under which the subject of personal data).

Processed personal data shall be destroyed or depersonalized upon attainment of processing purposes or in case of loss of necessity in attainment of such purposes, unless otherwise provided by the federal law or the contract (to which the personal data subject is a party, beneficiary or guarantor).

SECURITY OF PERSONAL AND CONFIDENTIAL INFORMATION

The security and protection of personal and/or confidential information are important to Advisor Media. Advisor Media implements reasonable technical, contractual, administrative and material measures to protect the personal and confidential information users provide, including secure 128 bit encryption (Secure Socket Layer – SSL) when required. Although 100% protection cannot be guaranteed, Advisor Media has implemented rigorous methods that meet strict security standards to ensure personal and confidential information is protected.

Advisor Media employees who have access to this information may only use it for the purposes indicated in the Confidentiality Policy herein and according to applicable laws and regulations.

Advisor Media employees are not authorized to discuss information concerning a user unless the correct answer to the contact's security question recorded for the user is provided. Advisor Media reserves the right, however, to directly contact a user concerning contributions due to

Advisor Media by virtue of applicable laws and regulations and to discuss related topics.

Advisor Media has implemented appropriate security measures to protect the integrity of data submitted when its members makes online payments using Moneris Solutions. All transactions conducted via Moneris Solutions online payments are 128-bit encrypted during transfer between Moneris Solutions and the user's computer. Each session is automatically deactivated as soon as the transaction is complete. To open a new session, the user must go back to the online reporting page on the "Invoices" screen and click again on the payment button. Regardless of this safeguard, users should never leave an online payment session unattended. It is always good practice to Quit the screen or reporting session before leaving the computer, even if planning to return in a few minutes.

ACCESS TO PERSONAL INFORMATION AND CHANGES

Users may access their personal information to view, update or change it by contacting Advisor Media at office@ad-visor.com

Users may also contact Advisor Media LLC at the following address:
Advisor Media LLC, Bryusov per., 2/14, bld 8, 125009, Moscow

UNDER-AGE USERS

Advisor Media takes appropriate precautions to comply with applicable laws concerning the privacy of under-age persons. The content of the

Website is designed for a general audience and not for under-age users. Advisor Media therefore does not seek to collect personal information from under-age persons without previously checking that consent has been given by parents or other authorized persons in accordance with the law. Should the user believe otherwise, he or she should contact Advisor Media to discuss the issue.

COLLECTION OF NON-PERSONAL INFORMATION

In the course of operating the Website, Advisor Media may collect non-personal information about its users.

“Non-personal information” is defined as the name of the Internet domain (e.g. “xyzcompany.com”) and the Internet protocol address (IP address) used to access the Website, the date and time of the visit, the pages visited, the browser type and version or the operating system used, as well as the previous and subsequent website accessed. General information, such as demographic statistics on users, the number of visitors and the average usage time of the Website are also considered non-personal information.

Advisor Media collects or gathers non-personal information in the course of its Website operations. For example, when the user chooses to visit the Website, web servers may automatically collect non-personal information provided via the user’s browser or stored as “cookies” or other digital markers.

USE OF NON-PERSONAL INFORMATION

Advisor Media uses non-personal information to follow up on Website use and to improve its management, conduct statistical analyses on all user characteristics and behaviour, measure demographic variables and user

interest in particular services, describe its services to third parties and potential business partners, and determine how Advisor Media resources should be applied and/or could be made more efficient. No personal information is disclosed during such activities.

Non-personal information is necessary for Advisor Media to gather required information on the number of visitors, the pages most frequently consulted, the technology used by Website users, link selection and users' country of origin.

Cookies are fragments of information sent to your computer when a website is viewed. These are traces of the user's visit that are recorded either temporarily or permanently on their hard drive and may include the date and time of the last visit, among other things. Cookies contribute to improving users' online experience by recording browsing preferences on a particular website.

Cookies left on users' hard drive are harmless and may be read or deleted at any time. Users therefore have complete control over them. The information allows us to determine the total number of visitors to each web page and the time spent on it. Every time users go to the Website, a cookie is created and left on their computer, therefore allowing Advisor Media to "recognize" them.

Many major websites use cookies, and most browsers are configured to allow cookies. The user may choose to change their browser settings so that a message is automatically sent to ask whether to accept or refuse cookies. While users are not required to accept cookies, they should be aware that certain Website functionalities may not work properly if cookies are refused.

This Website uses Google's Remarketing service which allows Google to show our ads on sites on the internet. Google uses cookies to serve ads based on a user's prior visits to our Website, in a way that does not personally identify users. Users may opt out of Google's use of cookies by visiting the [Google advertising opt-out page](#).

USER RIGHTS

The user has the right to:

To receive full information about his personal data processed by the Operator;

access to his personal data, including the right to obtain a copy of any record containing his personal data, except in cases established by the legislation of the Russian Federation;

refinement of his personal data, their blocking or destruction in case the personal data are incomplete, outdated, inaccurate, illegally obtained, or are not necessary for the stated purpose of this Policy;

withdrawal of consent to process personal data;

Taking measures to protect its rights under the laws of the Russian Federation;

Appealing to the authorized body for the protection of the rights of subjects of personal data or in court against the action or inaction of the Operator, carried out in violation of the requirements of the legislation of the Russian Federation in the field of personal data.

LINKS TO THIRD-PARTY SITES

The Website may contain links to third-party sites (“Third-Party Sites”) via which the user will leave the Website. Advisor Media provides these links for the user’s convenience. Advisor Media has no control over the content and use of such sites, nor on their practices relating to privacy and confidentiality. Therefore, any confidential or personal information provided through those sites will be subject to that site’s privacy policy. It is the user’s responsibility to consult such policies to ensure the privacy of their information.

QUESTIONS, COMMENT OR SUGGESTIONS

If you have questions, comments or suggestions regarding this Confidentiality Policy or Advisor Media’s practices relating to privacy that are not covered by this Confidentiality Policy, contact Advisor Media at office@ad-visor.com

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[Confidentiality policy for Advisor Media website users in Russian.](#)