

# Privacy Policy

**Last update: October 21, 2024**

This policy regarding the processing and protection of personal data (hereinafter referred to as the Policy) is applied by the joint-stock company Positive Technologies, located at 107061, Moscow, municipal district Preobrazhenskoye, Preobrazhenskaya Square, 8., room 60 (hereinafter referred to as the Company or us).

We are experts in the protection of devices, infrastructures and data, therefore we understand the importance of a proper approach to the confidentiality and security of information and adhere to the principle of comprehensive and complete protection of our users' personal data.

## Scope of the Policy

- 1.1. The Policy applies to the information resource – the Standoff 365 website, located at standoff365.com, including all domains of other levels and products hosted on it (hereinafter referred to as the Site). The Policy does not apply to other products and sites of the Company if the documentation of the relevant product or site does not contain links to the Policy.
- 1.2. Your use of the Site means unconditional acceptance of the Policy and the terms of personal data processing specified therein. In case of disagreement with this Policy, the use of the Site must be stopped immediately.
- 1.3. In the Policy, we openly disclose all the ways and conditions of processing personal data when using the Site.
- 1.4. The Policy has been developed by the Company in accordance with Federal Law No. 152-FZ dated 07/27/2006 "On Personal Data" (hereinafter referred to as the Law) and/or other applicable legislation.

## 2. What is personal data?

Personal data is any information related directly or indirectly to a specific or identifiable individual. For example, personal data may include last name, first name, patronymic, passport data, position and company name, email address, phone number.

Personal data may also include technical information if it can be correlated with a specific or identifiable individual: for example, IP address, type of operating system, type of device (personal computer, mobile phone, tablet), browser type, geographical location, the fact of filling out a web form.

## 3. Purposes of processing of personal data by the Company

We process your personal data for the following purposes:

№ п/п	Purpose	List of personal data*	Period of processing
3.1	To ensure your access to the Site and your use of its functionality	Nickname, password, last name, first name, patronymic, place of work, job position, phone number, email address, information automatically received from the Site, including using cookies**, information obtained as a result of your actions, including	During the term of the <a href="#">Terms of Use</a>

		information about the questions you left, information about your use site functionality (information about the internal balance on the Site, position in the rating, the number of points scored, prepared reports, etc.)	
3.2	To fulfill the contract with you (in case of its conclusion)	Last name, first name, patronymic, information about the place of registration, phone number, email address, bank account details	Within 5 (five) years after the end of the year in which such an agreement was executed
3.3	To send you promotional, informational and other materials	Last name, first name, patronymic, phone number, email address, subscription status, IDs in messengers and social networks	Within 10 (ten) years from the date of your consent
3.4	For your feedback	Last name, first name, patronymic, place of work, job position, phone number, email address, IDs in messengers and social networks, information about the questions you have left	Within 3 (three) days years from the date of sending you the last message (call) or from the moment of receiving your message, if we have not been able to contact you
3.5	To collect statistical and analytical information about your use of the Site	IP address, type of operating system, type of device (personal computer, mobile phone, tablet), browser type, geographical location, the fact of filling out the web form, Internet service provider, date and time of your access to the Site, information about your activity while using the Site (HTTP headers, web beacons/pixel tags, URL data, clicks through and from the Site (including date and time), Site pages that you viewed or searched, page response time, loading errors, duration visits to certain pages, information about the interaction of pages (for example, scrolling, mouse clicks), methods used to view the page of the Site.	During the term of the <a href="#">Terms of Use</a>
3.4	To protect the Site, the rights and legitimate interests of the Company	Nickname, password, last name, first name, patronymic, place of work, job position, phone number, email address, information automatically received from the Site, including using cookies**, information obtained	Within the time limits established by the legislation of the Russian Federation or other applicable

		as a result of your actions, including information about the questions you have left	legislation necessary to protect the Site, the rights and legitimate interests of the Company
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*\* The list of personal data may vary depending on the specifics of your interaction with the Site and the products posted on it.*

*\*\* Cookies are fragments of text that are automatically stored in your browser's memory using the Site. This allows the Site to access and retrieve the stored information on your computer, if necessary. The next time you return to the Site, we will be able to "get to know" you, as well as better consider your preferences regarding its use. Most browsers automatically save cookies, but you can always change your browser settings and opt out of saving cookies. For more information about cookie processing, see section 7 of the Policy.*

## 4. How we process your data

- 4.1. **Principles.** Minimizing the volume is the main principle that we strictly adhere to when processing personal data: we do not collect, store or otherwise process it unless it is really required.
- 4.2. We are also guided by the principles of personal data processing established by the current legislation of the Russian Federation or other applicable laws, including the following:
- Legality and fairness of personal data processing;
  - Processing of personal data only in accordance with specific, predetermined and legitimate purposes;
  - Preventing the consolidation of databases of personal data, the processing of which is carried out for incompatible purposes;
  - Accuracy, sufficiency, relevance and reliability of personal data (as far as it depends on us\*).

*\* You guarantee that all personal data provided by you are reliable, up-to-date and do not violate the laws of the Russian Federation or other applicable laws.*

- 4.3. **Methods.** We can process personal data both with and without automation tools. Processing may include collection, recording, systematization, accumulation, storage, clarification (updating, modification), electronic copying, extraction, receipt, use, transfer (provision, access, distribution), depersonalization, blocking, deletion and destruction of personal data.

- 4.4. **Collection.** When collecting personal data of Russian citizens, we provide recording, systematization, accumulation, storage, clarification (updating, modification) and using databases located on the territory of the Russian Federation.

Personal data can be collected in the following ways:

- provision of personal data by you when filling out forms on the Website;
- automatic collection of information using technologies and services: web protocols, cookies, web tags, which are triggered only when you enter your data.

- 4.5. **Storage.** Personal data is stored by us exclusively on properly protected systems. The Company has the right to combine personal data into an information system and process it

using other software tools. Processing of personal data in information systems is carried out according to a generally accepted algorithm (collection, systematization, accumulation, storage, clarification, use, blocking, destruction, etc.).

Among other things, we may clarify data with you (by mail, e-mail, telephone (including mobile), Internet, messengers), periodically contact you via telephone (including mobile), e-mail or the Internet, messengers.

- 4.6. The Company may involve third parties in the processing of your personal data by instructing third parties to process them and (or) by transferring your personal data to third parties without instructing them to process it. The involvement of third parties may be carried out only to achieve the purposes of processing personal data specified by us, as well as on condition that such persons ensure the confidentiality and security of personal data during their processing.

Such persons, in particular, may include the Company's affiliates, consultants, contract performers (including server—owning organizations, persons who make calls, SMS mailings, any other types of mailings and notifications, persons who conduct surveys and research), contractors and agents.

- 4.7. **International data transfers.** In order to achieve the goals set out in the Policy, we may transfer your personal data to countries other than the one in which they were received. When making an international data transfer, we protect your data in accordance with the Policy and applicable legislation.

- 4.8. **Destruction.** By default, we destroy personal data when the purposes of their processing are achieved or the need to achieve them is lost. In addition, we may destroy personal data in the following cases:

- the presence of a threat to the security of the Site;
- your violation of the terms of the Policy;
- your request or withdrawal of consent to the processing of personal data.

It is important to note that even if we receive a request from you to destroy personal data or revoke consent to the processing of personal data, we may continue to store and otherwise process them if necessary to comply with the requirements of the current legislation of the Russian Federation or we have other grounds for processing this personal data.

## 5. Your rights

The basic rules for working with personal data and your rights as a subject of personal data are described in detail in the Law or other applicable legislation. For your convenience, we provide a brief description of the basic rights provided by the Law:

Right to know	You have the right to learn more details about the Company's processing of your personal data (Articles 18, 18.1 of the Law).
Right to access	You have the right to ask us what personal data we process about you (Article 14 of the Law).
Right to correct your data, delete it	You can ask us to correct inaccurate, incomplete or outdated data, as well as delete them (clause 3 of Article 20 of the Law).
Right to withdraw consent	You can withdraw your consent to the processing of personal data when you deem it necessary (clause 2 of Article 9 of the Law).

For any questions related to personal data, you can contact us in accordance with the procedure provided for in section 8 of the Policy.

## 6. Notification of technical data processing rules. Analytical services

- 6.1. Captcha services can be used on the Site. They are needed to verify requests and block robots on our site and make the use of the Site more convenient for our users.
- 6.2. In order for captcha services to work, we can instruct their owners to collect and process technical data about your device, its activity and digital fingerprint (token, browser features, referer, timezone, etc.). This data is collected only when you use the Site or its individual pages on which the captcha service widget is installed.
- 6.3. Captcha services use only technical data and only for the purpose of functioning and maintaining the captcha service on the Site, as well as to improve the captcha service within the legitimate interest of its owner. The technical data collected by captcha services does not allow you to be reliably identified.
- 6.4. In addition, the Yandex.Metrica service is used to collect and statistically analyze data related to the use of the Site. The data collected by Yandex.Metrica can be received and processed by the provider of this service (Yandex LLC). The list of data collected using Yandex.Metrica can be found [here](#).

## 7. Processing of cookies

Type of cookies	Description
Strictly necessary	These cookies are necessary for the functioning of our Site and cannot be disabled. As a rule, they are activated only in response to your actions similar to requesting services, such as setting up a privacy level, logging in or filling out forms. You can configure your browser to block these cookies or notify you about their use, but in this case, it is possible that some sections of our Site will not work or will not work correctly.
Targeting	These cookies are set up through our Site by our advertising partners. They can be used by these companies to collect data about your interests and display relevant advertisements for you on other websites. If you do not approve the use of these cookies, you will not be shown our targeted advertising on various websites.
Operational	These cookies allow us to count the number of visits and traffic sources in order to evaluate and improve the performance of our Site. Thanks to them, we know which pages are the most and least popular, and we see how visitors navigate through websites.
Functional	These cookies allow you to provide improved functionality and personalization, for example for online chats and videos. They can be configured by us or by third-party providers whose services are contained on our pages. If you do not approve the use of these cookies, it is possible that some or all of these functions will not work properly

To opt out of the use of the relevant cookies, you have the right to use the functionality of our Site intended for this purpose. You also have the right to use your browser settings,

where you can disable the use of cookies. Detailed instructions on how to disable cookies are available via external links:

- **Google Chrome**
- **Safari**
- **Microsoft Edge**
- **Mozilla Firefox**

## 8. Information on the protection of personal data

All personal data you provide is confidential by default. The protection of personal data processed by the Company is ensured by legal, organizational and technical measures necessary and sufficient to meet the requirements of the legislation of the Russian Federation and/or other applicable legislation. However, we always try to protect your data as much as possible and apply more measures than required by law. Some of them are listed below:

- We have appointed a person responsible for the processing of personal data. You can contact such a person by e-mail: [privacy@ptsecurity.com](mailto:privacy@ptsecurity.com);
- We restrict access to your personal data and provide it only to those of our employees or our partners who need it to achieve the goals for which we process your data;
- We regularly assess the risks related to the processing of personal data and take measures to eliminate or minimize them;
- We conduct internal investigations to detect facts related to unauthorized access to personal data, if there is a suspicion that it has occurred;
- We regularly monitor and analyze the security of the Company's network infrastructure;
- We familiarize the Company's employees with the provisions of the legislation of the Russian Federation on personal data, including the requirements for the protection of personal data, with the local acts of the Company on the processing of personal data, as well as provide them with regular training;
- We organize a security regime for the premises where personal data carriers are located, which prevents uncontrolled entry into these premises or the presence of persons without access rights in them.

## 9. Data subjects' requests

9.1. You can send your requests to the Company, including regarding the use of your personal data:

- In writing to the address: 107061, Russia, Moscow, Preobrazhenskoye municipal district, Preobrazhenskaya pl., 8, room. 60;
- In the form of an electronic document by e-mail: [privacy@ptsecurity.com](mailto:privacy@ptsecurity.com).

9.2. The request must contain the following information:

- the number of the main document confirming your identity;
- information about the date of issue of the specified document and the issuing authority;
- information confirming your relationship with the Company;
- your signature.

9.3. The Company undertakes to review the received request and send a response to it to the address specified in the request within 10 (ten) business days, if it concerns the processing

of your personal data by the Company. If for some reason we need a little more time to respond, we will send you a message about it with a description of the reasons for the delay.

## 10. **Changes to the Policy**

- 10.1. The Company is not responsible for the actions of third parties who have gained access to your personal data through your fault.
- 10.2. The Company has the right to make changes to the Policy as necessary. The Policy is necessarily reviewed in case of significant changes in legislation in the field of personal data. The current version of this Policy is located at: <https://standoff365.com/en-US/privacy-notice/>.