

PERSONAL DATA PROCESSING POLICY

for the website <https://alego.biz>

This Personal Data Processing Policy (the "Policy") sets out the rules applicable to collection, recording, systematization, accumulation, storage, updating, use, transfer, deletion and destruction of personal data of users of the website <https://alego.biz> (the "Website").

This Policy has been prepared in accordance with Federal Law of the Russian Federation No. 152-FZ dated 27 July 2006 "On Personal Data" and other applicable legislation of the Russian Federation.

The personal data operator is the Website Administrator. Questions regarding personal data processing may be sent to the Website Administrator by e-mail at sales@alego.digital.

This Policy is a public document and is available at: <https://alego.biz/privacy-policy.pdf>. The User Agreement is available at: <https://alego.biz/polzovatelskoe-soglashenie.pdf>.

1. Basic Concepts

1.1. Personal data means any information relating directly or indirectly to an identified or identifiable individual.

1.2. Personal data processing means any operation or set of operations performed with personal data, including collection, recording, systematization, accumulation, storage, updating, use, transfer, restriction, deletion and destruction.

1.3. User means an individual who accesses the Website, uses Website functionality or submits information through Website forms.

1.4. Operator means the Website Administrator who independently or jointly with others organizes and/or carries out personal data processing and determines the purposes of processing, the scope of personal data and operations performed with personal data.

2. Scope of Personal Data Processed

2.1. The Website may process personal data voluntarily provided by the User through feedback forms, request forms, e-mail or other communication channels, including name, phone number, e-mail address, company name, position, content of the request and other information provided by the User.

2.2. The Website may also process technical data, including IP address, browser and device information, date and time of visit, pages visited, referrer page, cookies and other information required to ensure proper operation of the Website.

2.3. The Website does not intentionally collect special categories of personal data, including information on race, ethnicity, political opinions, religious or philosophical beliefs, health status or intimate life. The User should not submit such data through Website forms.

3. Purposes of Personal Data Processing

3.1. Receiving and processing User requests, feedback, consultations and business communications.

3.2. Contacting the User, responding to the Users request and providing the requested information.

3.3. Ensuring proper and secure operation of the Website, preventing abuse, spam, unauthorized access and other unlawful actions.

3.4. Improving Website content, structure, usability and quality of services.

3.5. Fulfilling obligations established by applicable legislation of the Russian Federation.

4. Legal Grounds for Processing

4.1. Consent of the User to personal data processing.

4.2. Processing necessary to respond to a User request, perform possible relations between the User and the Website Administrator or take preliminary steps at the request of the User.

4.3. Processing necessary to comply with obligations established by the legislation of the Russian Federation.

4.4. Processing necessary for the legitimate interests of the Website Administrator, provided that such processing does not violate the rights and freedoms of the User.

5. Processing Principles

5.1. Personal data is processed lawfully, fairly and transparently.

5.2. Processing is limited to specific, predetermined and lawful purposes.

5.3. The scope of processed data must not exceed what is necessary for the purposes of processing.

5.4. The Operator takes reasonable measures to ensure accuracy, sufficiency and, where necessary, relevance of personal data.

5.5. Personal data is stored no longer than required for the purposes of processing, unless a longer period is required by law.

6. Cookies and Analytics Tools

6.1. The Website may use necessary technical cookies to ensure page display, operation of forms, security and user experience.

6.2. If the Website uses statistics or analytics tools, their use shall comply with the personal data legislation of the Russian Federation, Website documents and information provided to Users.

6.3. The Website does not use Google Analytics or similar foreign analytics tools for processing personal data of Website users.

7. Personal Data Localization and Cross-border Transfer

7.1. When collecting personal data of citizens of the Russian Federation, recording, systematization, accumulation, storage, updating and extraction of such data shall be carried out using databases located within the Russian Federation, unless otherwise provided by Russian law.

7.2. If cross-border transfer of personal data is required, the Operator shall comply with the conditions and notification procedure established by the legislation of the Russian Federation before such transfer begins.

7.3. If cross-border transfer is not performed, the Operator does not transfer Users personal data to foreign individuals or foreign organizations, except where required by law or separately consented to by the User.

8. Personal Data Retention Period

8.1. Personal data is retained until the purposes of processing are achieved, until the User withdraws consent, or until the expiry of a retention period required by law.

8.2. Upon achievement of the processing purposes or loss of legal grounds for processing, personal data shall be deleted, destroyed or anonymized, unless otherwise provided by law.

9. User Rights

9.1. The User has the right to receive information regarding processing of his or her personal data.

9.2. The User has the right to request correction, restriction, deletion or destruction of personal data, provided that such request is permitted by law and there are grounds for it.

9.3. The User has the right to withdraw consent to personal data processing. Withdrawal of consent does not affect the lawfulness of processing performed before such withdrawal.

9.4. The User may send requests to sales@alego.digital. The request should contain information sufficient to identify the User and the substance of the request.

10. Personal Data Protection Measures

10.1. The Operator takes necessary legal, organizational and technical measures to protect personal data against unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution and other unlawful actions.

10.2. Protection measures may include access restriction, security settings, control of form processing, protection of communication channels, backup, log analysis and other reasonable information security measures.

10.3. Access to personal data is granted only to authorized persons and only to the extent necessary for performance of their duties or achievement of processing purposes.

11. Disclosure of Data to Third Parties

11.1. The Operator does not sell Users personal data to third parties.

11.2. Personal data may be provided to third parties where the User has consented to it; where it is necessary to process the User request; where required to comply with legal obligations; or in response to lawful requests of courts, competent authorities or as otherwise provided by law.

11.3. If a third party processes personal data on behalf of the Operator, measures shall be taken to ensure compliance with personal data protection requirements.

12. Amendments to this Policy

12.1. The Operator may amend this Policy. A new version takes effect from the date of publication on the Website, unless otherwise specified in the new version.

12.2. The User should periodically review the current version of this Policy. Continued use of the Website means acceptance of the current version of this Policy.

12.3. Matters not regulated by this Policy are governed by applicable legislation of the Russian Federation.