

## PRIVACY POLICY

The present document is the Privacy Policy for website [www.swisscentersamara.com](http://www.swisscentersamara.com) owned and operated by Swiss Center Samara Sàrl, a legal entity duly incorporated under the legislation of Switzerland (further referred to as “we”, “us” or “Swiss Center Samara”).

### Data collected

#### Data on customers

The information we collect falls into the following types:

- Personal information (“PI”) about our customers and partners (name (first and last name), email address, phone number, account login and password, data relating to sales, the number of employees, area of activity, or any other person who decided to contact us directly and therefore discloses his or her PI.

Customers include natural and legal persons who receive services from Swiss Center Samara, its network partners or its points of contact based in foreign countries (subsidiary in Samara, Russia). In the current context, services include: consulting service, event and trade fair services, employment services.

This information is either provided to us by yourself (when you complete a registration form), or received by us from third party source upon your prior consent. We collect your PI when you are involved in any activity that is personalized (completing a registration form, creating an account, submitting a request). You can choose whether to disclose your PI, or not. Please also note that you take full responsibility for lack and/or inaccuracy of your PI.

- Anonymous information (“AI”) does not identify you; it refers to your website trends and usage data. We use Google Analytics, a tool that helps us to understand how visitors engage with our website. For more information about Google Analytics, please visit: <https://www.google.com/analytics/>.
- Information on user activity (“IUA”). This information is collected automatically when you use our website, because it is information from your browser or device. This information includes your IP address and other information about your internet connection (domain information, Internet service provider, general geographic location, browser type), the equipment you use to access the website, and usage details (date, time, duration of your visit, pages and content you looked through; navigation information: what website you came from and what website you leave for).

When you use the website, we automatically collect the same information about your device and your device location data (based on GPS or WiFi signals), i.e. we ask for your location information through the website.

IUA does not identify you personally. We never try to combine IUA with PI.

### **How we use the data we collect about you**

We use information that we collect from or about you (including PI) in the following ways:

- 1) to operate and maintain our website;
- 2) to meet the requirements of service agreements;
- 3) to contact you with information, notices, special offers and other information we believe will be of interest to you. You can opt out of receiving such emails from us by clicking the Unsubscribe link or by following the instructions from each email we send to you.
- 4) to improve the content, functionality and usability of our website, to better understand your needs and interests;
- 5) to conduct market studies and marketing research;
- 6) for security or fraud prevention purposes; and
- 7) for any other purpose identified herein or in an applicable agreement between you and us.

### **Protection of minors**

We do not deliberately collect information from minors, as they are described by their personal law. If you do not possess the full legal capacity under your personal law or perform all the activities under supervision of your parents or guardian, or other legal representatives according to your personal law, please do not provide any information to us.

If we become aware that a user from whom we have collected personal information is a minor, we will immediately delete such information from our database.

We ask parents and guardians to supervise the online activities of their children. We bear no responsibility for the activities of minors, unless we are expressly informed about the minority and legal incapacity of this particular person.

### **Foreign users**

Users from all around the world can use our website. However, please note that all information collected about entities and natural persons

Please check whether the legislation of your country allows providing your personal information to foreign databases. We assume no liability to you or to any other person for your acts of non-compliance with your domestic legislation.

## **Storage and disclosure of the information**

We follow strict security procedures to ensure that your personal information is not damaged, destroyed, or disclosed to a third party without your permission (unless otherwise is foreseen in the present Privacy Policy) and to prevent unauthorized access to it. The computers that store the information are kept in a secure facility with restricted physical access and we use secure firewalls and other measures to restrict electronic access. If we are working with third parties we will require them to have in place similar measures to protect your PI.

We inform you that we reserve the right to disclose PI to the following entities:

- To our subsidiaries and affiliates.
- To contractors, service providers and other third parties we use to support our business. We may share your information (including PI) with a third party that has a reasonable need to access your information in order to provide services or support for us. We ensure that such third parties limit their use of your information solely to providing services to us and that they duly treat your PI and not make unauthorized use or disclosure of the information.

Also, we can include your PI to directories of subscribers to electronic communication services which are widely distributed and public. You are able to determine whether their personal data are published in a directory and if so, which. Unless you inform us otherwise, we assume that all PI which you provide us can be published in such directories. Providers of public directories should inform you of the purposes of the directory and of any particular usage which may be made of electronic versions of public directories especially through search functions embedded in the software, such as reverse search functions enabling users of the directory to discover the name and address of the subscriber on the basis of a telephone number only. We do not bear any responsibility for activities of providers of public directories.

In any case, the data may not be used for other purposes than those for which they were collected.

- To a buyer or other successor in the event of a merger, restructuring, reorganization or other sale or transfer of the website, whether as an acting enterprise or as part of insolvency, liquidation or similar proceeding, in which PI is transferred among other assets. Please be informed that an acquisition, merger or asset sale of the website to a third party is possible in the future.
- To law enforcement agents, if required by law or by a subpoena.
- For any other purpose for which we have your consent.

As for AI and IUA, since this information does not identify any individual, we reserve the right to disclose and share such information without restriction.

### **Forwarding of data to third parties**

Any data relating to our customers and partners that is widely available can be forwarded to third parties. Swiss Center Samara is automatically authorized to do this when an applicant signs the application for our services and products. Any data relating to customers that is widely available shall only be forwarded where this is necessary to provide the particular service required. Customer data that relates to corporate objectives, market and business interests, employee roles (directors, sales managers, marketing managers), sales, etc. ("sensitive data") can only ever be forwarded to third parties with your written consent.

**Information**

(Ex-)customers of Swiss Center Samara and (ex-)customers may receive information from us, from our official points of contact and from the network partners of Swiss Center Samara in Switzerland and abroad on specific or general economic activities. Such persons may be contacted in writing, by telephone or by e-mail. Anyone who is not interested in receiving this information and does not wish to be contacted can inform us accordingly.

We email various offers and information to customers, partners and contacts periodically. This contains general market information about Russia and Switzerland, details of business opportunities, details on events and fairs, etc. People not interested in receiving the newsletter can unsubscribe at any time.

**Data gathering and data exchange with a view to meeting the requirements of the service agreements****Handling data entered by users**

We offer a variety of online platforms, enabling the users themselves to enter details of the kinds of products, markets and business relationships they are interested in. The “Match-Making” facility (matching up Swiss supply with foreign demand) is intended as a way of targeting interested parties as efficiently as possible with information on business opportunities, trends and export/import/investment possibilities. There is also an opportunity for experts from various industries to register with a pool of experts so that they can offer advice and solutions to all kinds of technical questions. The databases of Swiss Center Samara can be accessed by the public. This ensures that market-relevant information is distributed as effectively as possible.

**Handling data entered by Swiss Center Samara**

As part of our role as a network coordinator, we have a database for entering data on companies, individuals and projects. This database is supplied with data from a wide variety of domestic and foreign sources. Employees of the Swiss Center Samara have access to the database.

**Scope of data processing, data security**

Swiss Center Samara relies on data exchange to meet the requirements of its service agreements. Swiss Center Samara is conscious of the problems that dealing with sensitive data presents. For this reason, data may only be used for the purpose explained at the time of its collection, for an obvious purpose that is clear from the context or for the purpose of meeting a legal requirement. Swiss Center Samara is committed to continuously checking the correctness and completeness of its data, and updates it on an ongoing basis.

Data collection and processing within the territory of Switzerland complies with the requirements of the federal law on data protection (DSG; SR 235.1) and the federal law on unfair practices (UWG; SR 241).

Data collection and processing within the territory of the Russian Federation is performed in conformity with the Federal Law "On Personal Data".

Data is collected whenever this is necessary for Swiss Center Samara to perform its role. Swiss Center Samara takes appropriate precautions to guarantee the security of its data. Swiss Center Samara restricts access to confidential information to those employees who actually require it to help Swiss Center Samara perform its role.

If the services offered by Swiss Center Samara are abused, in particular if there is a suspicion of criminal activity, data supplied by partners, customers and users may be evaluated to clarify the facts of the case and, on request, passed on to the competent authorities.

**Cookies**

"Cookies" are small files which make it possible to store specific user-related details on the user's computer or other terminal device while the user is visiting the website of Swiss Center Samara. Swiss Center Samara uses cookies to find out the frequency of use and the number of users of its website, and to present its range of products and services as conveniently, efficiently and attractively as possible.

Users can set their browser to disable cookies, restrict them to certain websites, or notify them as soon as a cookie is sent. Users can also delete cookies from their computer's hard drive at any time. However, rejecting session cookies may make it more difficult or impossible to use the website of Swiss Center Samara.

**Google Analytics**

This website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses "cookies", which are text files placed on your computer, to help the website analyze how users use the site. The information generated by the cookie about your use of the website (including your IP address) will be transmitted to and stored

by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full functionality of this website. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

This website uses the Google AdWords remarketing service to advertise on third party websites (including Google) to previous visitors to our site. It could mean that we advertise to previous visitors who haven't completed a task on our site, for example using the contact form to make an enquiry. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits to the website. Of course, any data collected will be used in accordance with our own privacy policy and Google's privacy policy.

If you do not wish to participate in our Google AdWords Remarketing, you can opt out by visiting [Google's Ads Preferences Manager](#)

### **Use of Site**

Harassment in any manner or form on the website, including via e-mail, chat, or by use of obscene or abusive language, is strictly forbidden. Impersonation of others, including a FreePrivacyPolicy.com or other licensed employee, host, or representative, as well as other customers or visitors on the site is prohibited. You may not upload to, distribute, or otherwise publish through the site any content which is libelous, defamatory, obscene, threatening, invasive of privacy or publicity rights, abusive, illegal, or otherwise objectionable which may constitute or encourage a criminal offense, violate the rights of any party or which may otherwise give rise to liability or violate any law. You may not upload commercial content on the site or use the site to solicit others to join or become customers of any other commercial online service or other organization.

### **Changes to Privacy Policy**

We reserve the right to update and modify the present Policy to ensure compliance with new technology, practices, legal requirements, or for other purposes. If any material changes occur (i.e., the change affects a substantial part of the present Policy and the rights of users), we will notify you via email included in our emailing list.

#### Contact information

To ask any questions or provide comments about the present Policy and our privacy practices, please do not hesitate to contact us via the contact form on our website.