

# PRIVACY POLICY AGREEMENT OF THE WEBSITE Denistiaglin.com

We respect the confidentiality of our Clients and website visitors, as well as we comply with the provisions of applicable privacy protection laws, including, but not limited to, the Federal Law on Information, Information Technology and Information Protection (N 149-FZ) and the General European Data Protection Regulation (GDPR).

All the terms specified in this Privacy Policy of the Website with a capital letter and not otherwise defined have the same meanings as in the User Agreement.

## 1. General Provisions

- 1.1. Current Rules are an official document of the Limited Liability Company “WETER LLC”, located at the address: 630099, Novosibirsk region, Novosibirsk, Deputatskaya st., 1, office 100 (hereinafter referred to as the Website Administration), which determines the procedure for processing and protecting information about private individuals using the services of the website <https://denistiaglin.com> (hereinafter referred to as the Website) and its services (hereinafter referred to as the Users).
- 1.2. The purpose of current Rules is to ensure adequate protection of information about the users, including their personal data, from unauthorized access and disclosure.
- 1.3. Relationships associated with the collection, storage, distribution and protection of information about users of the Website are regulated by current Rules, other official documents of the Website Administration and the current legislation of the Russian Federation.
- 1.4. The current version of the Rules, which are a public document, is available to any Internet user by following the link: <https://denistiaglin.com/privacy-policy/ru.html>. The Website Administration has the right to amend these Rules. When amending the Rules, the Website Administration notifies users of this by posting a new version of the Rules on the Website at the permanent address: <https://denistiaglin.com/privacy-policy/ru.html> no later than 10 days before the entry into force of the relevant amendments. Previous versions of the Rules are stored in the archive of the Website Administration documentation.
- 1.5. Current Rules have been developed and are used in accordance with the Terms of Use of the Denistiaglin.com website posted on the Website at the address: <https://denistiaglin.com/terms/ru.html>. In case of any contradictions

between current Rules and other official documents of the Website Administration, current Rules shall be applied.

- 1.6. By registering and using the Website, the User agrees with the terms of current Rules.
- 1.7. If the User disagrees with the terms of current Rules, he should immediately terminate the use of the Website and its services.

## **2. Website Use Terms**

- 2.1. Providing services for using the Website and its services (hereinafter referred to as the Website Services), the Website Administration, acting reasonably and in good faith, believes that the User:
  - 2.1.1. has all the necessary rights enabling him to register and use this Website;
  - 2.1.2. specifies reliable information about himself in the amount necessary to use the Website Services;
  - 2.1.3. is aware that the information posted by the User on the Website about himself may become available to other Website Users and Internet users, may be copied and distributed by such users;
  - 2.1.4. is aware that some types of information transferred by him to other Users cannot be deleted by the User himself;
  - 2.1.5. confirms and guarantees that he will not commit and (or) undertake any attempts to commit actions aimed at obtaining additional reward from the investments made through another personal account controlled by the User, registered in the name of the User and (or) another person, in the absence of the intention of such a person to make investments (the Company has the right to conduct its own verification of the User's compliance with this restriction and apply sanctions based on the results of this verification);
  - 2.1.6. is familiar with current Rules, expresses his consent to them and assumes the rights and obligations specified in them.
- 2.2. The Website Administration does not verify the accuracy of the information received (collected) about the users, unless such verification is needed in order to fulfill the obligations of the Website Administration to the user.

## **3. Information Processing Purposes**

- 3.1. The Website Administration processes information about the Users, including their personal data, in order to fulfill the obligations of the Website Administration to the Users regarding the use of the Website and its services.

## **4. User Information Components**

#### **4.1. Personal data of the Users include:**

- 4.1.1.** data provided by the Users and the minimum required for registration on the Website: login, email address, mobile phone number and password;
- 4.1.2.** data provided by the Users using the section for editing their personal data on the Website located at the specified address: <https://energy.denistiaglin.com/dashboard/verification> (including first name, last name, patronymic, gender, date of birth, registration address, citizenship and information about the identity document, namely: the number of the main identity document of the user and information about the date of issue of the specified document and the issuing authority);
- 4.1.3.** Data additionally provided by the Users at the request of the Website Administration in order to fulfill the obligations of the Website Administration to the Users. The Website Administration has the right, in particular, to request from the User a copy of an identity document or other document containing first name, last name, photo of the User, as well as other additional information that, at the discretion of the Website Administration, will be necessary and sufficient to identify such User and will allow to exclude abuse and violations of the rights of third parties.

#### **4.2. Other information about the Users processed by the Website Administration, which includes:**

- 4.2.1.** additional data obtained when accessing the Website, including data on technical means (devices), technological interaction with the Website (including host IP address, user's operating system type, browser type, geographical location, Internet access provider, data from the address book, data obtained as a result of access to a camera, microphone and other devices), and subsequent actions of the User on the Website;
- 4.2.2.** data automatically obtained when accessing the Website using bookmarks (cookies);
- 4.2.3.** information obtained as a result of the User's actions on the Website (in particular, the number of shares, income and referral statistics). This information about the User can be available to all partners of the User in the section "My Partners" in accordance with the user settings available to the User in the section "Privacy Settings".

### **5. Processing User Information**

#### **5.1. The processing of personal data is carried out on the basis of the principles of:**

- 5.1.1. legality of the purposes and methods of processing personal data;
  - 5.1.2. conscientiousness;
  - 5.1.3. compliance of the purposes of processing personal data with the goals predetermined and declared in the collection of personal data, as well as the powers of the Website Administration;
  - 5.1.4. compliance of the volume and nature of the processed personal data and methods of processing personal data with the purposes of processing personal data;
  - 5.1.5. inadmissibility of combining databases containing personal data created for incompatible purposes.
- 5.2. Conditions and purposes of personal data processing:
  - 5.2.1. The Website Administration processes the user's personal data in order to fulfill the agreement between the Website Administration and the User for the provision of Website Services.
  - 5.2.2. By virtue of Article 6 of the Federal Law of July 27, 2006 No. 152-FZ "On Personal Data", a separate consent of the User to the processing of his personal data is not required. By virtue of paragraph 2, clause 2 of Article 22 of this law, the Website Administration has the right to process personal data without notifying the authorized body for the protection of the rights of subjects of personal data.
- 5.3. Personal data collection:
  - 5.3.1. The collection of the User's personal data is carried out on the Website at registration, as well as in the future when the user enters, on his own initiative, additional information about himself using the Website's tools.
  - 5.3.2. Personal data provided for in clause 4.1.1. of current Rules is provided by the User and is the minimum required for registration.
  - 5.3.3. Personal data provided for in clause 4.1.2. of current Rules is additionally provided by the User on his own initiative using the "Basic Information" section.
- 5.4. Storage and use of personal data:
  - 5.4.1. Personal data of the users is stored exclusively on electronic media and is processed using automated systems, except for cases when manual processing of personal data is necessary in connection with the fulfillment of legal requirements.
- 5.5. Transfer of personal data:

**5.5.1.** Personal data of the Users is not transferred to any other third parties, except for the cases expressly provided for by current Rules.

**5.5.2.** The provision of personal data of the Users at the request of state bodies (local authorities) is carried out in the manner prescribed by the legislation. In order to fulfill the agreement between the User and the Website Administration and provide the User with access to use the functionality of the Website, the Website Administration develops and optimizes the quality of services and products, and improves the available functionality of the Website and services. To ensure the implementation of these goals, the User agrees to the implementation of the Website Administration in compliance with the applicable law of service mailings to his address (including polls) in order to receive feedback through the services of the Website Administration and (or) third party services: electronic messages, SMS and other types of mailings, as well as collection, storage, accumulation, systematization, extraction, comparison, use, and filling (clarification) of their data.

#### **5.6. Destruction of personal data:**

**5.6.1.** Personal data of the User is destroyed in the following cases:

- when the User contacts the Website Administration by sending a letter to the official email of the company: [WETER@denistiaglin.com](mailto:WETER@denistiaglin.com);
- when the Website Administration decides to destroy information posted by the User.

**5.6.2.** In case of deleting a User's personal account, the Website Administration stores personal and other necessary data of the User on its electronic media for the period necessary and established by the current legislation of the Russian Federation.

## **6. Rights and Obligations of the Users**

**6.1.** Users have the right to:

- 6.1.1.** carry out free chargeless access to information about themselves by uploading their personal pages to the Website using their logins and passwords;
- 6.1.2.** set the desired level of confidentiality in relation to information about themselves (conditions of access to information) in accordance with clause 6.3 of current Rules using the Website tools;
- 6.1.3.** require the Website Administration to clarify their personal data, block or destroy it if such data is incomplete, outdated, unreliable, illegally obtained or is not necessary for the stated purpose of processing;
- 6.1.4.** on the basis of a request, receive information from the Website Administration regarding the processing of their personal data.

- 6.2. Since the functionality of the Website also includes the Referral Program, the following information about the User is always available to each User of the Website registered using the referral link of a specific User:
  - 6.2.1. User login;
  - 6.2.2. email address, phone number, number of shares, if the User has made this information available for viewing by other Users on the Website in the “Privacy Settings” section.
- 6.3. User setting of the level of confidentiality of information about himself:
  - 6.3.1. With regard to the information specified in clause 6.2. of current Rules, the User has the right to establish one of the following levels of confidentiality:
    - 6.3.1.1. the information is available to registered Users of the Website;
    - 6.3.1.2. the information is available only to the inviting and invited Users of the Website;
    - 6.3.1.3. the information is available only to the inviting Users of the Website;
    - 6.3.1.4. the information is available only to the invited Users of the Website;
    - 6.3.1.5. the information is available only to the User.
- 6.4. The Website Administration is not responsible for the disclosure of the User’s personal data by other Website Users who have gained access to such data in accordance with the privacy level selected by the User.
- 6.5. In case of deleting personal data (other user information) from the User’s personal account, information about the User copied by other Users or stored on the pages of other Users is stored.
- 6.6. The User independently determines the conditions and provides access to his personal data to an unlimited number of persons, including by using the standard Website tools, as well as using the privacy and visibility settings of his personal information within the functionality provided to the User in accordance with clause 6.3. of current Rules. The Website Administration does not initiate and does not influence such a choice of the User, and also has no purpose to obtain permission from the User to distribute his personal data. The processing of personal data made by the User available to an unlimited number of persons is carried out by the Website Administration on the basis and in accordance with the terms of the Terms of Use of the Denistiaglin.com website and current Rules.

## **7. Measures to Protect User Information**

**7.1.** The Website Administration takes technical, organizational and legal measures in order to ensure the protection of the User's personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions

**7.2.** For authorization on the Website and access to the Personal Account, the User's login (email address or mobile phone number) and password are used. The User is responsible for the safety of this information. The User does not have the right to transfer his own username and password to third parties, and is also obliged to take measures to ensure their confidentiality.

**7.3.** For the purpose of ensuring more reliable protection of information about the Users, the Website Administration uses a system for linking a personal account to a mobile phone. For the functioning of this system, the User must provide the Website Administration with his mobile phone number.

**7.4.** As part of the system for linking a personal account to a mobile phone, the User, in the event of a login or password loss, can restore access to the page using the recovery code contained in the SMS message that the User receives on his mobile phone.

## **8. Rules Validity Limitation**

**8.1.** Current Rules do not apply to the actions and Internet resources of third parties.

**8.2.** Администрация The Website Administration is not responsible for the actions of third parties who, as a result of using the Internet or the Website Services, have obtained access to information about the User in accordance with the privacy level selected by the User, for the consequences of using information that, due to the characteristics of the Website, is available to any User registered by the referral link of a specific User. The Website Administration recommends that Users take a responsible approach to resolving the issue of the amount of information about themselves posted on the Website.

## **9. User requests**

**9.1.** The Users have the right to send their requests to the Website Administration, including requests regarding the use of their personal data, in writing to the address: 630099, Novosibirsk region, Novosibirsk, Deputatskaya st., 1, office 100, or in the form of an electronic document signed with a qualified electronic signature in accordance with the legislation of the Russian Federation, at the email address: [WETER@denistiaglin.com](mailto:WETER@denistiaglin.com)

**9.2.** The request submitted by the User must contain the following information:

- 9.2.1.** number of the main identity document of the user or his representative;
- 9.2.2.** information about the date of issue of the specified document and the issuing authority;

