



# KALASHNIKOV

## Privacy Policy

This Privacy Policy (hereinafter referred to as the Policy) applies to all information that Kalashnikov Concern JSC and/or its affiliates, including all parties belonging to the same Group as Kalashnikov Concern JSC (hereinafter referred to as the Concern), namely Russian Small Arms LLC, Kalashnikov Open Technologies LLC, and Media Systems LLC, may receive about the User while the User navigates the Websites (Kalashnikov.com, Kalashnikov.media, Kalashnikov.club, Kalashnikovgroup.ru, Kalashnikov.sport, and other websites within the Kalashnikov Group exchanging information), programs, products, or services of the Concern (hereinafter referred to as Services) and in the course of execution by the Concern of any agreements and contracts with the User.

The User's consent to the Policy expressed within the framework of relations with one of the listed parties shall apply to all other listed parties.

This Policy explains how the Concern processes and protects the personal data of Users.

The Concern reserves the right to publish additional or amended provisions of this Policy. For specific Services, the Concern may also publish additional provisions that supplement and/or modify this Policy.

By using the Services and providing the Concern with the information necessary to initiate further cooperation, in accordance with Part 3, Article 6 of Federal Law No. 152-FZ "On Personal Data Protection" dated July 27, 2006 and Part 1, Article 18 of Federal Law No. 38-FZ "On Advertising" dated March 13, 2006, the User:

- expresses consent to the processing of personal data with or without the use of automation means, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), exchange between parties belonging to the same Group as Kalashnikov Concern JSC, depersonalization, blocking, deletion, and destruction of personal data, as well as other use of the information provided and/or received, in accordance with this Policy;

- confirms the consent to the possible transfer of the User's personal data by the Concern to third parties, including for the purpose of providing advertising messages.

## **1. User personal data received and processed by the Concern**

1.1. For the purposes of this Policy, "personal data of the User / personal information" is understood to be:

1.1.1. Personal data (name, surname, and patronymic, email address, postal address, contact telephone number, and any information relating directly or indirectly to a specific individual) that the User provides about himself/herself, including when registering (creating an account) on the Websites or while using the Services. The information required to provide (render) the Services is clearly marked. Other information is provided by the User at his/her discretion.

1.1.2. Anonymized data automatically received by the Concern in the process of the User viewing any page on the Websites by means of the software installed on the User's device: IP address, information from cookies, information about the user's browser or other programs by means of which the Websites' services are accessed, retrieval time, address of the requested page, and other similar information.

1.2. The Concern does not verify the authenticity of the personal data provided by the User and is not able to assess his/her legal capacity. However, the Concern assumes that the User provides reliable and sufficient personal information and keeps this information up to date. The Concern does not control and is not responsible for third-party websites which the User may access by following the links available on the Concern's websites. Third-party websites may have their own privacy policy and other personal data may be collected or requested from the User.

## **2. Purposes of processing users' personal data**

2.1. The Concern processes only the personal data necessary to provide and improve the quality of services.

2.2. The Concern may use the User's personal data for the following purposes:

2.2.1. To identify a party while rendering a Service.

2.2.2. To provide the User with timely and personalized Services and offers (including those of an advertising nature).

2.2.3. To improve the quality of Services and develop new ones.

2.2.4. To give feedback to the User in order to provide information at the User's request.

2.2.5. To carry out statistical and other studies based on anonymized data.

2.2.6. To execute and/or perform functions, powers, and duties imposed on the Concern by the legislation of the Russian Federation.

### **3. Transfer of the User's personal data to third parties**

3.1. The User's personal data shall remain confidential, except for when processing personal data the access to which has been provided to an unlimited number of persons by the User or at his/her request.

3.2. The Concern has the right to transfer the User's personal data to third parties in the following cases:

3.2.1. The User has provided his/her consent to such actions.

3.2.2. The transfer is necessary for achieving objectives, performing and fulfilling functions, powers, and duties assigned to the Concern by this Policy and the legislation of the Russian Federation.

3.3.3. The transfer is subject to Russian or other applicable law within the procedure established by law.

### **4. Measures to protect Users' personal data**

The Concern takes necessary and sufficient organizational and technical measures to protect the User's personal data from illegal or accidental access, destruction, modification, blocking, copying, and distribution, as well as from other illegal actions involving the personal data of third parties. Personal data are stored until the Concern's activities have terminated or until the Users' personal data processing targets have been reached. The maximum period of personal data storage is 75 years from the moment of their receipt from the User.

### **5. Rights and obligations of the User**

5.1. The Concern undertakes reasonable and possible measures to maintain the accuracy and relevance of the personal data available to the Concern, as well as the deletion of outdated and other unreliable or excessive personal data; nevertheless, the User is responsible for providing reliable information, as well as for updating the provided data in case of any changes.

5.2. The User may at any time change (update, supplement) some or all of the personal information provided by him/her, as well as its privacy settings by contacting the Concern.

5.2.1. The User has the right to withdraw consent to personal data processing at any time by sending a written notice marked "withdrawal of consent to personal data processing" to the following address: Kalashnikov Concern JSC, Room 78, 2/193 im. Deryabina Proyezd, Izhevsk, Udmurt Republic, 426006, Russian Federation; in this case, the withdrawal of the User's consent

to personal data processing entails the deletion of the User's account from the Websites, as well as the wiping of records containing said personal data from the Concern's personal data processing systems, which may render the use of the Services of the Concern impossible for the User.

5.3. The User has the right to receive information related to the processing of their personal data by the Concern, to which end they may send a written request marked "request for information on the procedure for processing personal data" to the following address:  
Kalashnikov Concern JSC, Room 78, 2/193 im. Deryabina Proyezd, Izhevsk, Udmurt Republic, 426006, Russian Federation.

5.4. In order to execute the provisions of clauses 5.2 and 5.3 of this Policy, the Concern may require confirmation of the User's identity by requesting such confirmation in any form consistent with the law.

## **6. Feedback**

Questions and suggestions All suggestions or questions concerning this Policy may be addressed by the User to the Customer Support Service of the Concern (<https://kalashnikovgroup.ru/contacts/contacts/>), or by calling the Unified Hotline on 8-800-200-18-07.