#### PRIVACY POLICY

This Privacy Policy applies to the collection, processing and use of your personal data we collect from you via our website **www.gsa-services.ru** ("our site").

We process your personal data in compliance with the relevant data protection regulations, in particular the General Data Protection Regulation (GDPR).

The issue of data protection has a high priority at GSA LLC (hereinafter referred to as "we" or "GSA"). We therefore want to let you know how we implement data protection at our company, as well as about the information we record whenever you visit our website, how it is used, and what rights you have. Please note that your personal data will be used exclusively for the purposes described below and will not be processed otherwise or elsewhere without your consent.

For the purpose of GDPR, the data controller is GSA, Office 807, 65, Novocheryomushkinskaya street, Moscow, Russian Federation, 117418

Tel.: +7 495 230-31-01

8.00 - 16.00 (CET)

E-mail: info@gsa-services.ru

## What information do we collect from you, and how do we collect it?

Subject to your prior consent we collect and process the following data about you:

- · Information that you provide by filling in forms on our site;
- Details of your visits to our site including, but not limited to, traffic data, location data, weblogs and other communication data, and the resources that you access;
- · We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is statistical data about our users' browsing actions and patterns, and does not identify any individual.

The data is supplied on a voluntary basis. But you should be informed, that various processes will be delayed or may even become impossible, if you do not provide your personal data.

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information on the cookies we use, the purposes for which we use them and how to remove them see in Section "Cookies".

## Who do we disclose your information to?

We disclose information to service providers who provide services on our behalf. Your data will only be used by our third party providers to provide the requested services to us and each service provider is subject to a set of terms consistent with this Privacy Policy.

The following types of third party providers can provide us with services:

- Dispatching service provider company (for operational purposes);
- IT service providers;
- Consulting firms.

We may also pass on your personal data to other controllers if you explicitly request that by selecting an external recipient using our contact form. In such a case, we pass on the relevant personal data to the selected company.

We may also disclose your personal information to third parties, including third parties in a destination outside the EEA, if we are under a duty to disclose or share your personal data in order to comply with any legal or regulatory obligations, or in order to enforce or apply terms and conditions of our agreements; or to protect the rights, property, or safety of GSA, our customers, or others.

We will only transfer data outside the EEA where we have made arrangements to ensure that your data is treated securely and in accordance with this Privacy Policy.

#### **Data retention**

We process your personal data only for as long as required to fulfill the purpose for which it is processed.

We also process your personal data for as long as required to comply with various legal or regulatory obligations.

# Your rights

As a data subject, you have the following rights:

- The right to be informed of the use of your personal data;
- The right to access and/or to require the correction or erasure of your personal data;
- The right to block and/or object to the processing of your personal data;
- The right to not be subject to any decision based solely on automated processing of your personal data;
- In limited circumstances, you may have the right to receive personal data in a format which may be transmitted to another entity.

You may seek to exercise any of these rights by updating your information online (where possible) or by sending a written request to info@gsa-services.ru.

You also have a right to issue a complaint with a data protection supervisory authority. The supervisory authority responsible for GSA LLC is:

Austrian Data Protection Authority (DSB)

## Links to other websites

As the provider of this website, we are responsible for its content. However, we have no influence on whether the sites linked to our website comply with the applicable data protection regulations. We assume no liability for the content of external websites. We are responsible for our own content only. This content may differentiate from links to content provided by other providers, for which we cannot accept responsibility and do not present as our own content. The provider of the external website in question holds sole liability for damages caused by incorrect or illegal content on their website.

## **Cookies**

We use cookies on various pages to make your visit to our website appealing and enable you to use certain functions. Cookies are small text files that are stored on your device. They can be sent to a page when it is accessed and thus allow identification of the user. Cookies help make Internet sites more user-friendly. Some of the cookies used are deleted when the browser session is over, i.e. when you close your browser. They are termed session cookies. Other cookies remain on your device and enable us to recognize your browser again the next time you visit the website. They are termed persistent cookies.

You can set your browser so that you are notified when cookies are placed and can decide whether to accept them on a case-by-case basis or to exclude acceptance of cookies for specific cases or in general. You can delete cookies that have already been placed. If you do not accept cookies, the features of our website may be restricted.

Personal data is processed using cookies on the basis of Article 6 paragraph 1 point (f) GDPR. The purpose of processing your data and our legitimate interests are to enhance the features of our website.

# Automatic collection of access data/server log files

Whenever you visit our website, the following data record is stored each time the site or a page is called:

- The name of the user's Internet service provider
- The name of the user's Internet browser
- The time and date of the visit
- The amount of data transferred
- The user's IP address
- A description of the user's Internet browser
- The name of the accessed file
- Referrer-URL (the previous webpage)
- The operating system
- Notification of a successful data access, errors or unauthorized access

Personal data in log files is processed on the basis of Article 6 paragraph 1 point (f) GDPR. The purpose of processing your data and our legitimate interests are to simplify administration of our website and to enable us to detect and prosecute hacking. The information is ultimately analyzed in anonymized form.

# **Contacting us**

Our Internet site contains forms that you can use during capacity allocation procedures electronically.

You may also contact us using the e-mail address: info@gsa-services.ru.

If you contact us using one of these channels, the personal data you enter and send are automatically processed.

The personal data processed comprises the master data you enter in the contact form if you use it (name, first name, title, company, email address; street, city,

zip code) and possibly further personal data if you enter it when completing the forms.

If you contact us directly by e-mail, we record your e-mail address and, if applicable, any personal data from the e-mail's text.

Data is processed on the basis of Article 6 paragraph 1 point (f) GDPR. The purpose of processing your data and our legitimate interests are to provide customer care and support, as well as to be able to answer messages and mails sent to us.

# Information on your right to object to processing of your personal data

in accordance with Article 21 of the General Data Protection Regulation (GDPR)

You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you which is based on Article 6 paragraph 1 point (f) GDPR (data processing based on a weighing of interests), including any profiling based on those provisions within the meaning of Article 4 No. 4 GDPR.

If you object, we will no longer process the personal data concerning you unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defense of legal claims.

Your objection can be submitted without using a special form and, where possible, should be sent to e-mail address: info@gsa-services.ru.

Ongoing development of the Internet means that we will need to amend this Privacy Policy from time to time. We reserve the right to make such changes at any time.