

Rightech IoT Cloud (RIC) Portal and Platform Privacy Policy

This document is a translation of Privacy Policy in English. In case of conflict between the Russian version of Privacy Policy and this translation - only the Russian version of Privacy Policy is legally binding. The Russian version of Privacy Policy can be found here: <https://rightech.io/>

Effective Date: August 12, 2019

KOMNET LLC ("Rightech LLC"), a company incorporated under the Russian law and registered at 42 Bolshoy Boulevard, Territory of the Skolkovo Innovation Center, Moscow, 121205, Russia, hereinafter referred to as the "Company", undertakes to maintain strict confidentiality and ensure the security of data provided by Users of the Portal and the Rightech IoT Cloud (RIC) Platform (hereinafter referred to as the "Users"). Therefore, this Privacy Policy (hereinafter referred to as the "Policy") sets forth the Principles of ensuring the Company's confidentiality when using the Portal and the Rightech IoT Cloud (RIC) Platform (hereinafter referred to as the "Portal and Platform").

This Privacy Policy (together with the Terms & Conditions of the Portal and the Rightech IoT Cloud (RIC) Platform) represents all the conditions governing the relations of the Parties regarding the use of the Portal and the Platform.

All terms and definitions not specified in the Policy are contained in the Terms of Use of the Portal and the Platform, respectively.

1. Legal grounds for the processing of data

1.1. By accepting the terms of this Policy, as well as using the Portal and the Platform, the Users accept and agree to the processing of their credentials and other data that become available to the Company in the process of using the Portal and the Platform by these persons.

1.2. The Company processes credentials, i.e. information that is provided by the User when creating the User Account, as well as when editing the information indicated in them. If the User does not provide the necessary information, this may create obstacles for providing him with access to the Portal and the Platform. The company has the right, but is not obliged to verify the accuracy of the information provided.

1.3. The Company processes other data that becomes available to the Company in the course of the User's interaction with the Portal and the Platform, the services of affiliates and / or partners, including information about technical means (devices) and technological methods of interaction with the Portal and the Platform, including:

- the host's IP address;
- the type of the User's operating system;
- browser type;
- geographical location;
- provider information;
- other information that needs to be processed according to the Terms & Conditions of the Portal and the Rightech IoT Cloud (RIC) Platform.

The indicated data can be obtained using statistics services (for example, Yandex.Metrica statistics, Google Analytics and others).

In addition, the Company uses cookies to collect your Personal information and associate this Personal information with your device and web browser (see Section 6 below).

2. Data processing objectives

2.1. In order to comply with the Applicable Rules and provide access to the use of the functionality of the Portal and the Platform, as well as provide the User with services involving affiliates and partners of the Company, the Company researches, develops, optimizes and implements the new functionality of the Portal and Platform and methods of notifying Users about such functionality (including communication, advertising and other services and products).

2.2. The User agrees and delegates the Company to carry out processing (including collection, recording, systematization, accumulation, storage, clarification (updating, modification), comparison, extraction, use, depersonalization, blocking, deletion and destruction) User credentials and other data, including the results of automated processing of such data.

3. Processing time of data

3.1. Data processing is carried out from the moment of registration until the termination of the use of the Portal and the Platform, unless otherwise stipulated by the functionality of the Portal and the Platform and / or provided for by applicable law.

3.2. The User has the right to withdraw his consent to the processing of data by sending an appeal to the Company. Such data will be deleted by the Company within a reasonable time after confirmation by the applicant of the fact of belonging to him of the data specified in the relevant account.

4. The rights of Users

4.1. The User has the right to demand restrictions on processing, as well as the removal of credentials and other data that become available to the Company.

4.2. If the User believes that the credentials and other data that become available to the Company are incorrect or incomplete, then such a User has the right to enter his account and make changes on his own.

To the extent provided by applicable law, the User may be subject to other rights not specifically mentioned herein.

5. Transfer of User data to third parties

In order to properly fulfill the conditions of the Applicable Rules, the Company implements measures to ensure the security of the Portal and the Platform. To achieve these goals, the User credentials and other data cannot be transferred to third parties, except for the existence of reasonable grounds for supposing that the actions of the Users violate the rights of third parties, the interests of the Company or necessary for identification, investigation and suppression of illegal actions.

6. Use of cookies

6.1. Cookies are used by the Company to track information about the User. These files are transmitted by the web server of the Company through the web browser of the User and stored on the hard drive of his computer.

6.2. The company uses cookies to track page options, count clicks made by the User on a particular page option, monitor traffic and to measure the popularity of service settings. The company uses this information to understand User preferences, as well as to provide users with relevant data and services.

7. Applicable law

The processing of the above data is carried out on the basis of the legislation of the Russian Federation.

8. Updates to this Policy

8.1. The Company reserves the right to make amendments to the Policy. The User is obliged to familiarize himself with the text of the Policy at each access to the Portal and the Platform of the Company.

8.2. The Company undertakes not to make significant changes or impose additional burdens or restrictions on the rights of Users established by this Policy without proper notification. Relevant notifications shall be displayed on the Portal and Platform's website

until such changes take effect or shall be sent to Users via alternative communication channels, for example, by e-mail with relevant contact information.

8.3. In case of disagreement with the terms of the Policy the User shall not use the Portal and the Platform of the Company.

8.4. The new version of the Policy comes into force the day after it is posted on the Company's Website at: **<https://rightech.io/>**. Continued use of the Portal and the Platform of the Company after the announcement of a new version of the Policy means acceptance of the Policy and its terms by the User.