

Adaptive Production Technologies LLC

Privacy policy

DATA CONTROLLER INFORMATION

Adaptive Production Technologies LLC, located at address: 39A/3 space 1 room 23 Leningradskoe Shosse, Moscow 125212, Russian Federation (“Aprotech” or “we”).

YOUR PERSONAL DATA – WHAT IS IT?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller’s possession or likely to come into such possession.

WHY WE PROCESS YOUR PERSONAL DATA

We have obtained your personal data from you directly.

| Categories of personal data | Purpose of processing and legitimate interests, where applicable | Storage period |
|-------------------------------------|---|---|
| First and second name Email address | Detecting of candidate in case of repeated application and preventing fraud | 5 years from the date of refusal |
| First and second name Email address | Providing marketing and service information | Until the withdrawal or expiry of consent, maximum 12 months after last distribution of marketing information |

We have obtained your personal data from you directly.

TRANSFER OF DATA ABROAD

The personal data provided by users to Aprotech can be processed in Russia. Aprotech has taken appropriate security measures to protect your personal data in accordance with security and privacy best practices (such as <https://www.kaspersky.com/global-privacy-policy>). Where we share your personal data with a third-party service provider, we contractually oblige the third party service provider to implement adequate safeguards to protect your information.

HOW LONG DO WE KEEP YOUR PERSONAL DATA?

We retain your personal data only as long as necessary to fulfill the stated purposes, see column “storage period” in the chapter “WHY WE PROCESS YOUR PERSONAL DATA” above.

AUTOMATED DECISION MAKING

We do not use automated decision making.

DATA TRANSMISSION BY SOFTWARE

Our software does not transmit any data to the Aprotech infrastructure or third parties.

YOUR RIGHTS AND YOUR PERSONAL DATA

We inform you that you have certain rights regarding the personal data we maintain about you:

Right to be informed. You have the right to be provided with clear, transparent and easily understandable information about how we use your personal data, and your rights.

Right of access. You have the right to request information about how we use your personal data. In addition, you can request to receive a copy of the Personal Data we process about you and to check that we are lawfully processing it.

Right to rectification. Request correction of the personal data that we process about you.

Right to erasure (Right to be forgotten). This enables you to ask us to delete or remove personal data where there is no good reason, such as statutory retention periods, for us continuing to process it.

Right of restriction of processing. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.

Right to data portability. You may request to receive the personal data you have provided to us in a structured, commonly used and machine-readable format and to have the personal data transmitted to another controller.

Right to object. You have the right to object, on grounds relating to your particular situation, at any time to processing of personal data concerning you. If you object, we will no longer process your personal data unless we can demonstrate compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims. Additionally, you have the right to object at any time to processing of personal data for direct marketing purposes without giving any reasons.

Right to withdraw data protection consent. If you have given us your consent to the processing of your personal data, you may withdraw the consent at any time with effect for the future. This does not affect the lawfulness of the processing of your personal data before the withdrawal of the consent.

Right to complain. You have the right to contact the data protection authority in order to lodge a complaint against our data protection and privacy practices.

HOW TO EXERCISE YOUR RIGHTS

If you wish to exercise these rights towards us, you may at any time contact us directly: start@aprotech.ru; Adaptive Production Technologies LLC, 39A/3 space 1 room 23 Leningradskoe Shosse, Moscow 125212, Russian Federation, +7 (495) 970-71-17.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, except in relation to consent withdrawal, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive, or, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly

complex or you have made a number of requests. In this case, we will notify you and keep you updated.

COMPLAINTS

If you would like to make a complaint regarding this Privacy Statement or our practices in relation to your personal data, please contact us at start@aprotech.ru. If you consider that the processing of personal data relating to you infringes applicable data protection law, you have the right to lodge a complaint with the competent supervisory authority at any time. Which supervisory authority has competence for your complaint can depend on the country where you reside.