

CONFIDENTIALITY POLICY

1. Introduction

- 1.1. "**Website**" means a website located on the Internet at the following address: **www.a-plus.pw**
- 1.2. "**Website Administration**" - is a limited company "A+" located in the Moscow region (Russia), TIN 5010039616.
- 1.3. "**Agency**" - is a Translation Agency "A+" (A Plus) operating under "A+" LTD.
- 1.4. "**User**" - is an individual or legal entity who intends to receive some information about the services of the Translation Agency and / or to place an order.
- 1.5. "**Services**" - are the Agency activities in translation from one language to another, and also complementary services (delivery, notarization, etc. with possible outsourcing to provide their services).
- 1.6. "**Public Offer**" - is a document drawn up by the Agency containing basic conditions and standards for the provision of its services.
- 1.7. "**Policy**" - is this written up document for the users of the Website.

2. General Statutes

- 2.1. This Policy of confidentiality is a typical official document of the Agency that determines the order of processing and protection of the data of the people who make use of the services of the Agency.
- 2.2. The purpose of the Policy is to protect unauthorized access or disclosure of information obtained from users, including their personal data.
- 2.3. The acts related to the collection, preservation, disclosure and protection of users' data are regulated by the present Policy and other documents of the Administration of the Website, as well as by Russian law: Federal Law No. 152 of July 27, 2006 (About Personal Data), Federal Law No. 98 of July 29, 2004 (About Commercial Secret) and other legislative acts of the Russian Federation, in particular on the activity of translators, etc.
 - 2.3.1. However, there are laws that protect personal data in every European country, for example, in Great Britain the Data Protection Act 1998 (DPA) describes as confidential: name, surname, address, postcode, date of birth, NHS number, National Insurance Number etc. Any data or combination of data and other information, which can indirectly identify the person, will also fall into this definition. The Data Protection Act 1998 (DPA) is a United Kingdom Act of Parliament was also designed to protect personal data stored on computers or in an organized paper filing system.
 - 2.3.2. The main European Legislation in Data Protection documents are:
 - Directive 95/46/EC of the European Parliament and of the Council of October 24, 1995 (the Data Protection Directive) describes national laws that require high-quality data management practices on the part of the "data controllers" and the guarantees of a series of rights for individuals;
 - Regulation 45/2001 on the protection of individuals with regard to the processing of personal data by the Community institutions and bodies and on the free movement of such data of December 18, 2000 regulates the processing of individuals personal data when the processing is taking place by Community institutions and bodies;
 - Directive 2002/58/EC on privacy and electronic communications of July 12, 2002 guarantees the processing of personal data and the protection of privacy in the electronic communications sector;
 - Council Framework Decision 2008/977/JHA of November 27, 2008 on the protection of personal data processed in the framework of police and judicial cooperation in criminal matters;
 - Directive 2016/943 of the European Parliament and of the Council of June 8, 2016 on the protection of undisclosed information and business information (trade secrets) against unlawful acquisition, use and disclosure of such information, the purpose of which is to approximate the laws of the Member States of the European Union and so on.
 - 2.3.3. Some of the most prominent federal privacy of USA laws include, without limitation, the following:
 - Federal Trade Commission Act (15 U.S.C. §§41-58) (FTC Act) prohibits unfair or deceptive practices and has been applied to offline and online privacy and data security policies;
 - Children's Online Privacy Protection Act (COPPA) (15 U.S.C. §§6501-6506) which applies to the online collection of information from children, and the Self-Regulatory Principles for Behavioural Advertising;
 - Financial Services Modernization Act (Gramm-Leach-Bliley Act, GLB) (15 U.S.C. §§6801-6827) regulates the collection, use and disclosure of financial information;
 - On April 3, 2017, President Donald Trump signed into law a bill that repealed a set of privacy and data security regulations for broadband internet service providers adopted by the Federal Communications Commission (FCC) in the last months of the Obama administration.
- 2.4. The edition of the current Policy is a public document that is designed by the Website Administration and is freely accessible to any Internet user.

2.5. The Administration has the right to modify the Policy. When modified, the Administration must notify users about the publication of the new Policy on the Website at least 10 (ten) days before the changes take effect. The previous editions of the Policy are kept in the archives of the Administration.

2.6. The user has to express his agreement with the Police statements, also with all subsequent modifications, otherwise he will not be able to make use of the services of the Agency.

2.7. This Policy does not refer to the services, websites of third parties, etc., which have no legal or de facto relationship with the Administration. The user on his own regulates the situations when his personal data are transferred to third parties (notaries, courier services, etc.).

3. Conditions of use of the Agency's services

3.1. The Administration of the Website, acting reasonably and in good faith, considers that a User:

- has all necessary rights that allow him to request information on the Agency services and/or to place orders;
- communicates actual and authentic information about himself that is necessary to book the services;
- read and understood this Policy, the Public Offer of the Agency and expresses his consent with them and assumes the responsibilities and rights indicated therein.

3.2. The Website Administration meets the obligations in accordance with the User's information that was presented, and that does not imply any responsibility in case when the non-compliance or non-compliance of the services came to be a result of an improper notice from the User about modifications (change of his name, surname, telephone number, email address, delivery address, etc.).

3.3. The Website Administration will not be responsible for the information voluntarily submitted by the User, and may apply the right to verify this data, however, in case when any personal information presented by User, is not authentic, the User will assume all the unfavorable consequences related to it.

4. Content of personal data of Users

4.1. The Website Administration handles information about Users, including personal data, only for the purpose of providing the services of the Agency.

4.2. For primary requests, the User provides a minimal information:

- Name (for courtesy, necessary);
- Email (for communications, necessary);
- Telephone number (for direct calls, at will).

4.3. To carry out a translation, the Agency may request extended information about the User or other persons for whom the User requests the translation service (for example, name, surname, address, place of work, financial information, etc.), all this refers to personal data.

5. Handling of Personal Data

5.1. The handling of Personal Data: the collection of personal data is carried out only for the purposes of the Agency's own activity: to manage, distribute, provide services ordered by the User, enforce contracts that can be concluded, adjust services at the User's request, in addition to offering the User new services and send him financial, administrative, organizational, commercial information about orders, etc.

5.2. The preservation and use of Personal Data: personal data are stored exclusively on electronic media and are processed using automated computer systems.

5.3. The Personal Data transferring: the Personal Data of Users are not transferred to third parties except in cases directly provided by this Policy. The law prohibits the transfer of personal data to third parties without the consent of the User. An exception is their disclosure at the request of law enforcement agencies or according to a judicial decision.

5.4. The destruction of Personal Data is carried out at the written User's request to the Agency.

5.5. The Personal Data of the User will never be disclosed or transmitted to other Users of the Agency.

6. Measures to protect Users information

6.1. The Website Administration takes technical and organizational and legal measures to ensure the protection of personal data of every User from unauthorized or accidental access to them, destruction, modification, blocking, copying, distribution, as well as from other illegal actions.

6.2. The Administration performs checks, monitoring and evaluation of the processing of personal data to ensure the confidentiality of data and other information received from the Users.

7. User Requests

7.1. The Users have the right to send their requests to the Website Administration, including regarding the use of their personal data provided for in Clause 5 of this Policy, for applying their access rights, corrections, withdrawals

and objections in free form in relation to their incorporated data in the archives of the Agency, by sending Request in writing by e-mail or regular mail to the Agency Office.

7.2. The Website Administration undertakes to examine and response to requests received within a maximum of 30 (thirty) days from receipt of such requests.

7.3. All information and/or correspondence received by the Website Administration from the Users (paper documents, messages in written or electronic form), is classified as information of limited access and it is not disclosed without the written consent of the User. The Personal Data and other information about the User who sent the request can not be used without the special consent of the User in any other way, either to respond to the subject of the received request or in cases directly provided by law.

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