Privacy Policy of the website of LLC "Lombard Privilegia" (TIN 7730239309, PSRN 5177746091804)

This Privacy Policy ("Policy") of Limited Liability Company "Lombard Privilegia" (hereinafter – the "Company") is an integral part of the services provided on the website accessible at www.lombard-privilegia.ru (hereinafter – the "Site").

By using the Site's services, the User unconditionally agrees to this Policy and to the terms of processing their personal data; if the User does not agree with any term, they must cease using the services immediately.

1. GENERAL PROVISIONS

1.1. For the purposes of this Policy, "personal data" means:

1.1.1. Personal data that the User voluntarily provides when registering (creating an account) or using the Services, including any data marked as mandatory for Service provision.

1.1.2. Data automatically transmitted by the User's device when using the Site's services, including IP address, cookies, browser type (or other software used to access the Services), device and software characteristics, access date and time, requested page URLs, and similar technical information.

1.1.3. This Policy applies only to the Site **www.lombard-privilegia.ru**. The Company does not control and is not responsible for third-party websites to which the User may navigate via links on this Site.

2. PURPOSES OF PROCESSING PERSONAL DATA

2.1. The Site collects and stores only those personal data that are necessary to provide the Services or to fulfill agreements with the User, except where law requires retention for a specified period.

– Upon receipt of a notice from the User withdrawing consent, the Company will cease processing the User's personal data within ten (10) business days.

- Notices of consent withdrawal must be sent by email to **info@lombard-privilegia.ru** or by mail to:

121165, Moscow, Kutuzovsky Ave., 30, Office 1/5P.

2.2. The Company processes personal data for the following purposes:

2.2.1. Identifying registered Users and promoting the Company's products and services by direct communication.

2.2.2. Providing Users with access to personalized Site resources.

2.2.3. Establishing feedback with Users, including sending notifications, responding to requests, and processing applications.

3. CONDITIONS FOR PROCESSING AND DISCLOSURE TO THIRD PARTIES

3.1. User data are stored in accordance with the Company's internal regulations.

3.2. The Company maintains the confidentiality of personal data, except where the User has voluntarily made certain data public.

3.3. The Company may disclose User data to third parties only in the following cases:

3.3.1. With the User's express consent.

3.3.2. Where required by Russian or other applicable law under established procedures.

3.4. The User's personal data is processed for an indefinite period using the following methods: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction of personal data, including within personal data information systems with or without the use of automation tools. Processing of personal data is carried out in accordance with Federal Law No. 152-FZ of July 27, 2006, *"On Personal Data."*

3.5. In the event of a loss or unauthorized disclosure of personal data, the Company shall notify the User of such an incident.

3.6. The Company takes all necessary organizational and technical measures to protect the User's personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other unlawful actions by third parties.

3.7. The Company and the User shall take all reasonable measures to prevent damages or other adverse consequences caused by the loss or unauthorized disclosure of the User's personal data.

4. OBLIGATIONS OF THE PARTIES

4.1. The User shall:

4.1.1. Provide accurate personal data necessary for using the Site.

4.1.2. Update or supplement the provided personal data in the event of any changes.

4.2. The Company shall:

4.2.1. Use the collected personal data solely for the purposes stated in this Privacy Policy. 4.2.2. Ensure the confidentiality of personal data; not disclose it without the prior written consent of the User; not sell, exchange, publish, or otherwise disclose the User's personal data, except as provided for by this Privacy Policy.

4.2.3. Block personal data related to the respective User upon receiving a request from the User, their legal representative, or an authorized government body for the protection of personal data subjects' rights, for the duration of the verification process in case of detection of inaccurate data or unlawful actions.

5. LIABILITY OF THE PARTIES

5.1. The Company shall be liable for any losses incurred by the User resulting from the unlawful use of personal data, in accordance with the legislation of the Russian Federation.

5.2. In the event of loss or disclosure of confidential information, the Company shall not be held liable if the confidential information:

5.2.1. Had already become publicly available before its loss or disclosure.

5.2.2. Was received from a third party before it was received by the Site Administration. 5.2.3. Was disclosed with the User's prior consent.

6. DISPUTE RESOLUTION

6.1. Before initiating court proceedings regarding disputes arising from the relationship between the User and the Site Administration, the parties must submit a claim (a written proposal for voluntary settlement).

6.2. The recipient of the claim must respond in writing within fifteen (15) calendar days from the date of receipt.

6.3. If the dispute cannot be resolved amicably, it shall be submitted to a court in accordance with the applicable laws of the Russian Federation.

6.4. This Privacy Policy and all relations between the User and the Site Administration are governed by the legislation of the Russian Federation.

7. ADDITIONAL CONDITIONS

7.1. The Company reserves the right to amend this Privacy Policy without the User's consent.

7.2. The updated Privacy Policy enters into force upon its publication on the Site, unless otherwise specified in the new version.

7.3. All suggestions or questions related to this Privacy Policy should be directed to: info@lombard-privilegia.ru

7.4. The current version of the Privacy Policy is available at: www.lombard-privilegia.ru