

Privacy Policy

Effective date: September 10, 2020

JSC "Pravo.ru" ("We", "Our", "Us") are committed to protecting and respecting your privacy.

This policy sets out the basis on which any personal data we collect from you, that you provide to us, or that is provided to us by a subscriber to our services, will be processed by us. Our App's use of information received from Gmail APIs will adhere to Google's Limited Use Requirements. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By visiting www.form.one, you are accepting and consenting to the practices described in this policy.

Information We may Collect from You

We may collect and process the following data about you:

- **Information you give us.** You may give us information about you by filling in forms on our site www.form.one (**our site**) or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you register to use our site, subscribe to our service, participate in any discussion boards, forums or other social media functions on our site or enter a competition, promotion or survey and when you report a problem with our site. The information you give us may include personal identifiers, such as your first, last, and/or full name, address, and/or geographical location, e-mail address and phone number, date of birth, gender, financial and credit care information, log-in password, job title and function, personal description and photograph, and other similar personal information. We also store the Content that you upload or provide to the Service in order to provide you with the features and functionality of the Service.
- **Information for Purposes of Payment Service.** In order to use certain of our payment services, or to make payments to us, you may be required to provide us with financial information, to include bank account numbers, online bank account login, and credit card information. We may also capture additional information when you make payments, such as card type, transaction type, and credit care information.
- **Information Provided when You Otherwise Interact with Us.** Personal Information resulting from surveys, customer service communications, or use of other features of our services.
- **Business Data.** While Business Data is not Personal Information, we recognize that it is sensitive and may even be confidential. We will not use any such data except how it is outlined in this policy.

• **Information we receive from other sources.** We may receive information about you from individuals or corporate entities which are subscribers to our service ('Subscribers') where you are to be designated a user of our service. We may receive information about you if you use any of the other websites we operate or the other services we provide. We are also working closely with third parties (including, for example, subcontractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies) and may receive information about you from them, subject to your agreements with them.

Cookies

We use cookies for content personalization, analytics/performance, functional purposes, as well as the ability to access secure areas of our site. Users can control the use of cookies at the individual browser level. If you reject cookies, you may still use our site, but your ability to use some features or areas of our site may be limited.

Tracking Technologies

Technologies such as: cookies, beacons, tags and scripts are used by JSC "Pravo.ru" and our marketing partners, affiliates, or analytics or online customer support service providers. These technologies are used in analyzing trends, administering the site, tracking users' movements around the site and to gather demographic information about our user base as a whole. We may receive reports based on the use of these technologies by these companies on an individual as well as aggregated basis.

Analytics/Log Files

Log Files - As is true of most web sites, we gather certain information automatically and store it in log files. This information may include internet protocol (IP) addresses, browser type, internet service provider (ISP), referring/exit pages, operating system, date/time stamp, and/or clickstream data.

We may combine this automatically collected log information with other information we collect about you. We do this to improve services we offer you, to improve marketing, analytics, or site functionality.

Local Storage

We use Local Storage (LSs) such as HTML5 to store content information and preferences. Third parties with whom we partner to provide certain features on our site or to display advertising based upon your Web browsing activity use LSs such as HTML5 to collect and store information. Various browsers may offer their own management tools for removing HTML5 LSOs.

Behavioral Targeting

We partner with a third-party to either display advertising on our web site or to manage our advertising on other sites. Our third-party partner may use technologies such as cookies to gather information about your activities on this site and other sites in order to provide you advertising based upon your browsing activities and interests. If you wish to not have this information used for the purpose of serving you interest-based ads, you may opt-out by clicking [here](#). Please note this does not opt you out of being served ads. You will continue to receive generic ads.

Uses Made of the Information

We use information held about you in the following ways:

- **Information you give to us.** We will use this information:

- to carry out our obligations arising from any contracts entered into between you and us or between a Subscriber and us and to provide you with the information, products and services that you or a Subscriber request from us;
- to provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
- to provide you with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by electronic means (e-mail or SMS) with information about goods and services similar to those which were the subject of a previous sale or negotiations of a sale to you. If you are a new customer, we will contact you by electronic means only if you have consented to this. If you do not want us to use your data in this way, please do not tick the relevant box situated on the form on which we collect your data (the registration form);
 - to notify you about changes to our service;
 - to ensure that content from our site is presented in the most effective manner for you and for your computer.

- **Information we collect about you.** We will use this information:

- To carry out our obligations arising from any contracts entered into between a Subscriber and us;
- to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our site to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our site safe and secure;

- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you, Subscribers and other users of our site about goods or services that may interest you or them.

• **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive). We may use Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

• **We receive and share the following personal data with Google services:**

Requests to access the user's mail:

- Request email profile of the user, to get his email address.
- Request of letters and threads of the user, to link them to the cases.
- Sending emails on behalf of the user.

Purpose: to ensure that the user has an account in Gmail, send and receive emails within the Site.

Requests to access calendars:

- Create a calendar.
- Get a list of events from the calendar.
- Create / edit / delete calendar events.

Purpose: to provide access through the Site to the events and tasks of the user from Google Calendar. The user can also create an event and a task in the Google Calendar through the Site.

Requests for Google Drive:

- Get files and directories from GoogleDrive.
- Create files and directories in GoogleDrive.
- Delete files and directories from GoogleDrive.
- Download files from GoogleDrive.

Objective: to enable the user to access files in Google Drive through the Site. The user can also create, modify, delete files in Google Drive using the Site.

Disclosure of Your Information

We may share your personal information with any member of our group. We will not share personal information about you or any Content with any third parties except as described in this Privacy Policy or in connection with the Service. We may share your information with selected third parties, including:

- Business partners, vendors, suppliers and subcontractors for the performance of any contract we enter into with you or a corporate entity which is a subscriber.
- Analytics and search engine providers that assist us in the improvement and optimization of our site.
- Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

In certain situations, JSC "Pravo.ru" may be required to disclose personal data in response to lawful requests by public authorities, including to meet national security or law enforcement requirements. We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If JSC "Pravo.ru" or substantially all of its assets are acquired by a thirdparty, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms and conditions of service and other agreements; or to protect the rights, property, or safety of JSC "Pravo.ru", our customers, or others. This includes exchanging information with other companies and organizations for the purposes of fraud protection and credit risk reduction.
- If JSC "Pravo.ru" is involved in a merger, acquisition, or sale of all or a portion of its assets, you will be notified via email and/or a prominent notice on our Web site of any change in ownership or uses of your personal information, as well as any choices you may have regarding your personal information.

Some of our pages utilize framing techniques to serve content to/from our partners while preserving the look and feel of our site. Please be aware that you are providing your personal information to these third parties and not to www.form.one.

User Access and Choice

JSC "Pravo.ru" will make commercially reasonable efforts to provide you reasonable access to any of your personally identifying information we maintain within 30 days of your access request. If your personally identifiable information changes, or if you no longer desire our

service, you may [correct, update, amend, delete/remove, ask to have it removed from a public forum, directory or testimonial on our site or deactivate it] by making the change on our member information page [or by emailing our Customer Support at info@form.one by contacting us by telephone or postal mail at the contact information listed below.

We will retain your information for as long as your account is active or as needed to provide you services. We will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements.

Opt-out Preferences

If you wish to subscribe to our newsletter(s), we will use your name and email address to send the newsletter to you. Out of respect for your privacy, you may choose to stop receiving our newsletter or marketing emails by following the unsubscribe instructions included in these emails, accessing the email preferences in your account settings page or you can contact us at info@form.one.

Where We Store Your Personal Data

The data that we collect from you will be stored at a destination:

- English version - in the United States;
- versions in other languages - in the country where the language is native.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on secure servers in a controlled environment with limited access. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Security

Form.one employs industry standard security measures to ensure the security of information. However, the security of information transmitted through the Internet can never be guaranteed. Form.one is not responsible for any interception or interruption of any communications through the Internet or for changes to or losses of information. Users of our sites are responsible for maintaining the security of any password, user ID, or other forms of authentication involved in obtaining access to password protected or secure areas of any

Form.one website. In order to protect you and your information, Form.one may suspend your use of website, without notice, pending an investigation, if any breach of security is suspected. Access to and use of password protected and/or secure area of any Form.one site is restricted to authorized users only. Unauthorized access to such areas is prohibited and may lead to criminal prosecution. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorized access. In the unlikely event of any such access, we will notify you. If you have reason to believe that your interaction with us is no longer secure (i.e., you feel that the security of any account you may have with us has been compromised), please immediately notify us of the problem by contacting us in accordance with the “Contact Us” section herein.

Your Rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third-party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at info@form.one.

Third-Party Websites and Links to Other Sites

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. The inclusion of a link on the Site does not imply endorsement of the linked site by us or by our affiliates. Though the existence of a link on our website probably means that we think you'll find the information interesting, we can't guarantee the accuracy or completeness of anything on those websites, and we don't assume any responsibility for anything contained on those sites. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites. This Privacy Policy applies only to information collected by Form.one.

Blogs and Social Media

Our website includes social media features, such as Facebook Like button and widgets such as the Share button. These features may collect your IP address, which page you are visiting on our site, and may set a cookie to enable the feature to function properly. Social media features and widgets are hosted on our site or by a third-party, and your interactions with these features are governed by the privacy policy of the company providing it.

Our website includes publicly accessible blogs or community forums. Any information you provide in these areas may be read, collected and used by others who access them. This includes information posted on our public social media accounts. To request removal of your personal information from our blog or community forum, contact us at info@form.one. In some cases, we may not be able to remove your personal information, in which case we will let you know if we are unable to do so and why. Testimonials With consent, we may display personal testimonials of satisfied customers on our site, along with other endorsements. If you wish to update or delete your testimonial, you can contact us at info@form.one.

Import Contacts

You can import contacts from your Outlook or other email account address book to invite them to become members of our site. We collect the username and password for the email account you wish to import your contacts from and will only use it for that purpose.

Our Policy Toward Children

The Service is not directed at individuals under the age of 13. We do not knowingly collect personal information from children under 13. If you become aware that a child has provided us with personal information, please contact us at info@form.one. If we become aware that a child under 13 has provided us with personal information, we will take steps to delete such information.

Regulatory Information

This statement embodies the internationally accepted principles of data protection and privacy, without replacing existing national laws. It applies in all cases as far as it is not in conflict with the respective national law; additionally, the national law shall apply if it makes greater demands. National law applies in the case that it entails a mandatory deviation from, or exceeds the scope of, this statement for data protection. This statement also applies in countries in which there is no corresponding national legislation in place.

EU GDPR: JSC "Pravo.ru" adheres to the EU General Data Protection Regulation as set forth by the European Parliament & Council regarding the processing of personal data and the free movement of such data.

EU-U.S. and Swiss-U.S. Privacy Shield: JSC "Pravo.ru" adheres to the EU-U.S. and Swiss-U.S. Privacy Shield Frameworks as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the European Union and Switzerland to the United States. JSC "Pravo.ru" has certified to the

Department of Commerce that it adheres to the Privacy Shield Principles. The Federal Trade Commission has jurisdiction over JSC "Pravo.ru"'s compliance with the Privacy Shield. JSC "Pravo.ru" complies with the Privacy Shield Principles for all onward transfers of Personal Information from the EU and Switzerland, including the onward transfer liability provisions.

If there are any conflicts between the terms in this statement and EU data privacy principles, the principles shall govern.

Dispute Resolution

In compliance with the Privacy Shield Principles, Form.one commits to resolve complaints about our collection or use of your personal information. JSC "Pravo.ru" will investigate and attempt to resolve complaints and disputes regarding the use and disclosure of sensitive information in accordance with the principles contained in this statement. EU and Swiss individuals with inquiries or complaints regarding our Privacy Shield policy should first contact JSC "Pravo.ru" at:

Address: 119034, Russia, Moscow, Pozharsliy pereulok, bld.11
E-Mail: info@form.one

Form.one has also committed to refer unresolved Privacy Shield complaints to the International Centre for Dispute Resolution/American Arbitration Association, an alternative dispute resolution provider located in the United States. If you do not receive timely acknowledgment of your complaint from us, or if we have not addressed your complaint to your satisfaction, please visit <http://go.adr.org/privacyshield.html> for more information or to file a complaint. The services of International Centre for Dispute Resolution/American Arbitration Association are provided at no cost to you.

Form.one has further committed to cooperate with EU data protection authorities (DPAs) and the Swiss Federal Data Protection and Information Commissioner (FDPIC) and comply with the advice given by such authorities with regard to human resources data transferred from the EU and Switzerland in the context of the employment relationship.

An individual has the possibility, under certain conditions, to invoke binding arbitration for complaints regarding Privacy Shield compliance not resolved by any of the other Privacy Shield mechanisms.

JSC "Pravo.ru" complies with the EU-U.S. Privacy Shield as set forth by the U.S. Department of Commerce regarding the collection, use, and retention of personal information transferred from the Swiss-U.S. Privacy Shield to the United States. JSC "Pravo.ru" has certified to the Department of Commerce that it adheres to the Privacy Shield Principles. If there is any conflict between the terms in this privacy policy and the Privacy Shield Principles, the Privacy Shield Principles shall govern. To learn more about the Privacy Shield program, and to view our certification, please visit <https://www.privacyshield.gov/> .

Changes to Our Privacy Policy

Any material changes we may make to our privacy policy in the future will be posted on this page prior to the change becoming effective and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

Contact

Questions, comments, and requests regarding this privacy policy are welcomed and should be addressed to info@form.one.