

PRIVACY POLICY

I. FUNDAMENTAL PROVISIONS

The present provisions on privacy policy (hereinafter - Provision) are a part of the official document of OOO Diastom Dr.Drevin's clinic (hereinafter – the Company/Operator) and it stipulates the order of processing and protection of information on private individuals (hereinafter - users) who use the services, information, consumer services and programs (also loyalty programs).

Respect of confidentiality is important to the Company since the key target of this Policy is to provide security of human rights while processing personal data, moreover to protect right to privacy, private family life and private life from unsanctioned access and disclosure.

We have developed the Privacy Policy which describes our process of personal data processing – any actions (operation) or cumulative actions (operations) which are performed with or without the use of automation facilities on personal data including capturing, recording, arrangement, accumulation, storage, clarification (update, change), extraction, usage, circulation (sharing, providing, access), depersonalization, blocking, deleting, destruction of personal data. Relationship connected to processing of personal data and data on the users of the Website are regulated by the Provision, other official documentation of the Company and by the regulation of Russian Federation.

Processing of personal data provided by us is legal and justified, we act reasonably and fair according to the following principles:

- Legitimate objectives and ways of personal data processing;
- Conscientiousness;
- Compliance of data processing objectives to the preliminary required and defined data and also authority of the Company;
- Compliance of volume and type of personal data and ways of processing to the objectives of data processing.

This Privacy Policy regulates any kind of personal data processing (any information which allows identification of a person or any fact on this person) on private individuals that are considered as consumers of the products or services of the Company. This Privacy Policy applies to the data processing of private data accumulated by any tool either passive or active through the Internet or without it from any person worldwide.

II. PERSONAL DATA COLLECTION

The objective of the Company to collect data is to meet commitments to the Users on employment of the Website and its' services. Personal data is processed after a user agrees to

process his or her personal data. Personal data is any kind of information connected directly or indirectly to a certain or determined private individual (a subject of personal data) which can be used for identification or connection with a person. We can request your personal data at any moment when you contact the Company. The Company can use such data in accordance with the Privacy Policy. The Company also can unite this information with any other information in order to provide or improve products or services, information fulfillment (content) and communication. Hereinafter some examples of personal data types, which the Company can collect and the ways in which the Company can use it.

WHAT TYPE OF DATA WE COLLECT

We can collect different data/information including:

- Name and surname;
- Date of birth;
- Sex, family status;
- Address;
- Phone number;
- E-mail address;
- Information on favorite contacts;
- Information on bank cards (name, card number).

Personal data can also include additional data provided by User according to a request of the Company in order to provide to the Users authorities, stipulated in a services contract. The Company has a right to require a User a copy of a document identifying a person or any other document which contains name, photo and other additional data, which is necessary and full according to the Company in order to identify a User and avoid any abusive act and third party rights infringement. When you attract and invite other persons to our activities, events and communications, the Company can collect personal data on these persons, such as name, date of birth, e-mail address, address and phone number. While processing data we provide accuracy of personal data, sufficiency and in some cases actuality to the objectives of data processing if necessary.

III. PERSONAL DATA USAGE AND MAINTENANCE

Personal data of users is kept only on electronic media and processed by using automation systems except for cases when the processing is not automated and is necessary to fulfill legal requirements.

HOW WE USE YOUR PERSONAL DATA

Data that we collect allows us to send you notifications on new products, special offers and different events. It also helps us to improve our services, content and communications. If you don't want to be included in our mail list, you can decline it by informing us via our feedback contacts or by changing your profile setting on the Website. We also can use your personal data for inner objectives, such as: audit, analysis of data and different researches to improve the Company's services and products, communication with the consumers.

If you take part in a prize drawing, competition or any event of this kind, we keep the right to use the data you provide in order to manage such programs.

NON-PERSONAL INFORMATION COLLECTION AND USAGE

Moreover, we collect personal data which is non-personal. It's a data which does not allow identifying any person directly. We can collect, use, share and disclose non-personal data for any objectives. Herein are some examples of non-personal information, how we collect and use it: information on activities, language, postal code, device id, location and time zone in which a product is used in order to understand better the tendencies among consumers and improve products, services and communications. We also can collect personal data/information on users' interests on our Website while using other our products and services. Such personal data is collected in order to help us provide to our clients more useful information and to understand which elements of our Website, products and services are more attractive. Such cumulative data/information described is regarded as non-personal for objectives of the Privacy Policy. If we combine non-personal information with personal, such combination will be regarded as personal information s long as it is combined.

IV. COMMUNICATION OF PERSONAL DATA

Personal data of users is not communicated to any other third parties, except for cases stipulated by the Rules. Processing of personal data has no time limits, provided basing on legacy and specifically in personal data systems with or without usage of automation tools. User agrees that the Company can communicate personal data to third parties, particularly by courier companies, post services, telecom carrier etc., only for objectives from the article Collection of personal data of the Privacy Policy. When the user has accepted the agreement and he/she is indicated, communication of personal data to third parties contractors of Operator can be provided with a condition that confidentiality of the information, especially used in applications, must be respected. Applications which users utilize on the Website are located and supported by third parties (developers) that act independently from the Operator

and do not act under the name or by order of the Company. Users are obliged to study the code of service and privacy policy of such third parties (developers) themselves before they start to use corresponding applications. Personal data of a user can be communicated according to request of government authorities of Russian Federation on purposes and order established in accordance with legislation of Russian Federation. Operator blocks personal data of a certain user on request of him/her, his/her legal represent or authority on protection of the rights of subjects of personal data for a period of verification in case of unreliable personal data or any wrong act.

DATA DISCLOSURE TO THIRD PARTIES

In some cases the company can provide certain personal information and data to strategic partners who are working with the Company in order to provide products and services or to those who help the Company to release products and programs to consumers. We communicate to third parties the minimum volume of personal data necessary for a certain service or a transaction. Personal information is provided by the Company only for such objectives as provision of consumers with services, products and corresponding communications and improvement. Such information is not communicated to third parties for the marketing objectives. To use your personal data for any other purpose we request you to agree to process your personal information.

SERVICES SUPPLIER

The Company communicates personal data/information to companies of such services as information processing, allowing credit, execution of consumer orders, delivery, other kinds of customer services, estimation of your interest to our products and services, polls for customer study or customer satisfaction study. These companies guarantee to protect your information worldwide.

OTHER PERSONS

The Company may need to disclose your personal data according to law, judicial procedure, trial and/or on the basis of public requests or requests from government bodies on or outside territory of your location country. We also can communicate your personal information if we detect that such disclosure is necessary or applicable as objective to national safety, law enforcement or any other important public cases. We also can disclose your personal information if we detect that disclosure is necessary to implement our Provisions and conditions or to secure activity of us and our users. In case of reorganization, mergence or sale we can communicate any or all collected personal information to the corresponding third party.

V. PERSONAL DATA DESTRUCTION

Personal data of a user is destroyed in the following cases:

- When a subject of personal data recalls an agreement on personal data processing;

IDENTIFICATIONAL FILES (COOKIES) AND OTHER TECHNOLOGIES

Website, interactive services and applications, e-mail messages and any other communications of the Company use identification files (cookies) and other technologies, such as: pixel tags, web beacons. These technologies help us to understand better users' behavior, inform us which elements of our Website were visited and estimate efficiency of advertisement and web searches. Information collected by cookies and other technologies is considered by the Company as non-personal. In this case our objective is to provide more comfortable and personal interaction with the Company. If we know your name, for example, we can use it in our communication. If we know that somebody has bought a certain product or has used a certain service using your device, we can correspond more to your interests in advertisement messages or e-mail messages. As a result, all these details help us to provide you superior services. If you can disable cookies in the settings of your web browser or mobile phone, notice that some functions of the Website can become unavailable. As most of websites, we collect some information automatically and keep it in statistics files. This information includes IP-address, language type of a browser, internet supplier information, referral and exit pages, information on operating system, time and date, visits. We utilize this information in order to analyze and understand tendencies, manage the Website, study behavior of users, collect demographical information and status of the general audience. The Company can use such information in its' marketing objectives. We use interactive references to the information on our Website in some of our e-mail messages. When users click these references, before they get to the page of the Website, a user request undergoes separate registration. We monitor such data in order to determine interest to separate topics and evaluate efficiency of our communications with consumers. If you do not want your requests to be monitored in this way you shouldn't click on text or graphical references in your e-mail messages. Pixel tags allow us to send e-mail messages in a format able to be read by consumers and inform us if they were read. We can use this information to limit number or cancel messages, which our customers receive.

VI. PERSONAL DATA SECURITY

The Company takes precautionary measures including rights, organizational, administrative, technical and physical aspects with the intention to provide safety of your personal data according to an article 19 of Federal law dated 27.07.2006 № 152- FL On personal data with the objective to provide users' personal data security against illegal or accidental access, destruction, change, blocking, copying, spreading and other unjustified actions by third

persons. When you use some products, services or applications of the Company or share posts on message boards, in chats or social media other users can view the personal information you provide and collect or use it. You are responsible for personal data, which you want to share yourself. For example, if you write your name or e-mail on the message board this information becomes public. Please, follow the warnings while using such functions.

SUSTAINABILITY AND PRESERVATION OF PERSONAL DATA

You can easily update your personal data when you interact with the Company. We keep your personal data during the period necessary for objectives described in this Privacy Policy, except for cases when a period should be prolonged according to law or approved by law.

TRIRD-PARTY WEBSITES AND SERVICES

Websites, products, applications and services of the Company can contain references to other websites, products and services of third parties. Our products and services also can use or offer products or services of third parties. Personal data which includes location or contacts collected by third parties is regulated by rules of privacy policy of these third parties. We encourage you to learn privacy policy rules of third parties. Operator is not responsible for acts or consequences caused by third parties, which have received access to any user personal data available to anyone via the Internet or Website services.

RESPECT OF YOUR CONFIDENTIALITY ON THE COMPANY LEVEL

To ensure that your personal data is safe we spread provisions of confidentiality and safety respect to the employees of the Company and strictly control it inside the Company.

QUESTION ON CONFIDENTIALITY

If you have any questions on the Company's Privacy Policy or data processing feel free to contact us for feedback.

VII. USERS' INQUIRIES

Regulation of Russian Federation applies to the Privacy Policy and relations between users and the Operator. Users have the right to send the Operator inquiries including inquiries on use of their personal data, recall an agreement on personal data processing in written form to the address in General provisions article, or in electronic document form signed by a qualified electronic signature according to the regulation of Russian Federation and send it via feedback

form. Inquiry of a user should meet rules prescribed by the rules on placing an inquiry to the service of support, particularly inquiry should contain:

- Number of a general document identifying personality of a user or his representative;
- Date of issue of a document, name of a body;
- Facts on relationship between a user and the Operator (ID number, or short (under domain) name that replaces ID number);
- A user or his/her representative signature;
- E-mail address;
- Phone number;

The operator has to consider and send an answer to the inquiry of a user during 30 days from the date of receipt.

OTHER

In other cases not described directly in the Privacy Policy the Company applies norms and provisions of Federal law dated 27.07.2006 N 152 – FL On personal data. A company Website visitor providing his/her personal data agrees on terms and conditions of the present Privacy Policy. The Company reserves the right to implement any changes at any time to the Policy in order to improve the security system from illegal access to the personal data without agreement of a user. When we implement any significant changes to the Confidentiality Policy, we place a notification to our Website with the updated version of Policy attached. This document is not applicable to any actions of Internet resources of third parties.