

## Privacy Policy

### 1. General statements

The following personal data processing policy defines the procedure for processing of personal data and security measures to protect personal data undertaken by the LAMSYSTEMS CC (hereinafter referred to as the Operator).

1.1 The Operator sets out the protection of the rights and freedoms of any data subjects when processing their personal data, including the protection of the right to privacy, personal and family secrets, as the most important aim and condition to operating.

1.2 The following Operator's Policy regarding personal data processing (hereinafter referred to as the Policy) applies to all information that the Operator may obtain from Users of the website [www.lamsys.com](http://www.lamsys.com).

### 2. Definitions

2.1 Automated processing of personal data is the procedure for personal data processing carried out using computers and IT enabled tools.

2.2 Blocking personal data is the temporary process of interruption of personal data processing (except where processing is required for personal data refinement).

2.3 Website is a set of graphics and information, as well as computer programs and databases that ensure their availability on the Internet at the network address [www.lamsys.com](http://www.lamsys.com).

2.4 Personal data information system is a set of personal data contained in personal data databases, as well as information technologies and tools used for their processing.

2.5 Depersonalization of personal data is the action of making it impossible to establish a connection between personal data and the User, or to a specific data subject without using additional information.

2.6 Personal data processing is any action (operation) or a set of actions (operations) with personal data performed with or without automated means, including collection, recording, systematization, accumulation, storage, refinement (updating, amendment), extraction, use, transfer (dissemination, provision, access), depersonalization, blocking, deletion and destruction of personal data.

2.7 The Operator is a government authority, a municipal authority, a juridical or natural person, which severally or jointly arranges and (or) performs the processing of personal data, as well as defines the purposes of personal data processing, the scope of personal data to be processed and the actions (operations) performed with personal data.

2.8 Personal data is any information directly or indirectly related to identified or identifiable Users of the website [www.lamsys.com](http://www.lamsys.com).

2.9 The User is the individual using the website [www.lamsys.com](http://www.lamsys.com).

2.10 Provision of personal data is the action aimed at disclosing personal data to a specific person or a specific group of persons.

2.11 Dissemination of personal data is any action aimed at disclosing personal data to an indefinite group of persons (personal data transfer) or acquaintance with personal data of an unlimited number of persons, including personal data promulgation in the mass media, as well as publication in information and communication networks or providing access to personal data in any other way.

2.12 Cross-border transfer of personal data is a transfer of personal data to a foreign country to a foreign government body or a foreign natural or juridical person.

2.13 Destruction of personal data is action that leads to a destruction and impossible restoring of the content of personal data in the personal data information system and (or) resulting in the destruction of physical storage medium on which personal data are stored.

3. The Operator may process the following personal data relating to the User

3.1 Full name.

3.2 Phone number.

3.3 Email address.

3.4 Name of the organization.

3.5 The Operator may receive the data that was automatically collected through the website, including:

3.5.1 IP address.

3.5.2 The information about the browser (or any other program that provides access to deliver advertising).

3.5.3 Access time.

3.5.4 The page address from which User is sending data.

3.6 The website collects and processes depersonalized data of its Users (including cookies) by means of web analytics services (such as Yandex Metrika, Google Analytics and others).

3.7 The information above of the following Policy is summed up as Personal Data.

4. Purposes of personal data processing

4.1 Purpose of personal data processing is to handle urgent matters pertaining to sales, maintenance service and equipment repair, as well as improvement to informing customers about products.

4.2 The Operator has the rights to send notifications about new products and services, special offers and various events to the User. The User may opt out or unsubscribe from any information messages by sending an email containing the note “Opt out of notifications about new products and services and special offers” in the subject line of an email to the Operator to [webadmin@lamsys.ru](mailto:webadmin@lamsys.ru).

4.3 Depersonalized data of the User collected by means of web analytics services is used to collect information about the actions of the User on the website, as well as improving the quality and the content of the website.

## 5. Lawful basis for personal data processing

5.1 The Operator processes personal data of the User only if the data was filled in and (or) sent independently by the User through the forms on the website [www.lamsys.com](http://www.lamsys.com). The User agrees to the following Policy by filling in the forms and (or) sending personal data to the Operator.

5.2 The Operator processes depersonalized data only if it is allowed by the User in the browser settings (enabled cookie and JavaScript).

## 6. The procedure for data processing

The Operator takes appropriate security measures to protect personal data by means of implementation of legal, organizational and technical measures necessary to fully comply with the requirements of the current legislation in the field of personal data protection.

6.1 The Operator ensures the safety of personal data and takes all possible measures to exclude access to personal data by unauthorized persons.

6.2 Personal data of the User will never be disseminated under any circumstances to third parties, with the exception of cases determined by the current legislation.

6.3 The User may update the inaccurate personal data independently by sending an email containing the note “Personal Data updating” in the subject line of an email to the Operator to [webadmin@lamsys.ru](mailto:webadmin@lamsys.ru).

6.4 The period of personal data processing is not limited. The User may revoke the consent given for personal data processing by sending an email containing the note “Revocation of the consent given for personal data processing” in the subject line of an email to the Operator to [webadmin@lamsys.ru](mailto:webadmin@lamsys.ru).

## 7. Cross-border transfer of personal data

7.1 Before the cross-border transfer of personal data the Operator must ensure that the foreign country that is supposed to receive personal data provides an adequate level of protection of the rights of data subject.

7.2 The cross-border transfer of personal data to the foreign country that does not correspond to the mentioned above criteria may be processed only if there is a written consent of data subject to the cross-border transfer of their personal data and (or) the execution of an agreement to which the data subject is a party.

## 8. Final clauses

8.1 The User can receive any clarifications on issues of interest regarding personal data processing by sending an email to the Operator to [webadmin@lamsys.ru](mailto:webadmin@lamsys.ru).

8.2 Any changes made by the Operator in the personal data processing policy will be reflected in the following document. The Policy is of indefinite duration until it is replaced by a new version.

8.3 The current version of the Policy is freely available on the Internet via the link [www.lamsys.com/files/pdf/politika.pdf](http://www.lamsys.com/files/pdf/politika.pdf).