

APPROVED
by the Resolution of the
General Director of AVRATEK LLC
Minutes No. 31 dated May 29, 2026
_____ G.E. Baskakov

Personal Data Processing Policy of AVRATEK LLC

Moscow 2026

1. General provisions

This personal data processing policy is compiled in accordance with the requirements of Federal Law No. 152-FZ of 27.07.2006 "On Personal Data" and defines the procedure for processing personal data and measures to ensure the security of personal data taken by AVRATEK LLC (hereinafter referred to as the Operator).

1.1. The Operator sets as its most important goal and condition for the implementation of its activities the observance of human and civil rights and freedoms in the processing of its personal data, including the protection of the rights to privacy, personal and family secrets.

1.2. This Operator's policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator may receive about visitors to the website <http://avratek.com>

2. Basic concepts used in the Policy

2.1. Automated processing of personal data – processing of personal data using computer technology;

2.2. Blocking of personal data – temporary termination of the processing of personal data (except in cases where the processing is necessary to clarify personal data);

2.3. Website – a set of graphic and informational materials, as well as computer programs and databases that ensure their availability on the Internet at a network address <http://avratek.com>;

2.4. Personal data information system – a set of personal data contained in databases, and information technologies and technical means that ensure their processing;

2.5. Depersonalization of personal data – actions as a result of which it is impossible to determine, without the use of additional information, the identity of personal data to a specific User or other subject of personal data;

2.6. Processing of personal data – any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including the collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data;

2.7. Operator – a state body, a municipal body, a legal entity or an individual who independently or jointly with other persons organizes and (or) performs the processing of personal data, as well as determines the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data;

2.8. Personal data – any information related directly or indirectly to a specific or identifiable User of the website <http://avratek.com>;

2.9. User – any visitor to the website <http://avratek.com>;

- 2.10. Provision of personal data – actions aimed at disclosure of personal data to a certain person or a certain circle of persons;
- 2.11. Dissemination of personal data – any actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or at familiarizing an unlimited number of persons with personal data, including the publication of personal data in the mass media, posting in information and telecommunications networks, or providing access to personal data in any other way;
- 2.12. Cross-border transfer of personal data – transfer of personal data to the territory of a foreign state to the authority of a foreign state, a foreign individual or a foreign legal entity;
- 2.13. Destruction of personal data – any actions as a result of which personal data is permanently destroyed with the impossibility of further restoration of the content of personal data in the personal data information system and (or) the material carriers of personal data are destroyed.

3. The Operator may process the following personal data of the User

- 3.1. Last name, first name, patronymic;
- 3.2. Email address;
- 3.3. Phone numbers;
- 3.4. Year, month, date and place of birth;
- 3.5. Photos;
- 3.6. Certificate of citizenship;
- 3.7. Details of the identity document;
- 3.8. Taxpayer identification number, date of registration, details of the certificate of registration with the tax authority;
- 3.9. Number of the certificate of compulsory pension insurance, date of registration in the compulsory pension insurance system;
- 3.10. Number of the compulsory medical insurance policy;
- 3.11. Address of the actual place of residence and registration at the place of residence and (or) at the place of stay;
- 3.12. Information about education, profession, specialty and qualification, details of educational documents;
- 3.13. Information about marital status and family composition;
- 3.14. Information about property status;
- 3.15. Information about income;
- 3.16. Information about debt;
- 3.17. Information about previously held positions and work experience, military duty, military registration;
- 3.18. Also on site is the collection and processing of anonymous data about visitors (including cookies) using Internet statistics (Yandex Metric and Google Analytics and others).

3.19. The above data, hereinafter referred to as the Policy, is united by the general concept of Personal Data.

4. Purposes of personal data processing

4.1. The purpose of processing the User's personal data is to inform the User by sending e-mails; to conclude, execute and terminate civil contracts; to provide the User with access to the services, information and/or materials contained on the website.

4.2. The Operator also has the right to send notifications to the User about new products and services, special offers and various events. The User can always refuse to receive information messages by sending an email to the Operator at the email address info@avratek.com

4.3. Depersonalized User data collected through Internet statistics services is used to collect information about User actions on the site, improve the quality of the site and its content.

5. Legal grounds for processing personal data

5.1. The Operator processes the User's personal data only if they are filled in and / or sent by the User independently through special forms located on the website <http://avratek.com>. By filling out the appropriate forms and / or sending your personal data to the Operator, the User agrees to this Policy.

5.2. The Operator processes depersonalized data about the User if this is allowed in the User's browser settings (saving cookies and using JavaScript technology are enabled).

6. The procedure for the collection, storage, transfer and other types of processing of personal data

The security of personal data processed by the Operator is ensured by implementing the 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 of unauthorized persons.

6.2. The User's personal Data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of current legislation.

6.3. In the event of inaccuracies in the personal data, the User can update them independently by sending a notification to the Operator at the Operator's e-mail address info@avratek.com marked "Updating of personal data".

6.4. The term of processing of personal data is unlimited. The User can withdraw his consent to the processing of personal data at any time by sending a notification to the Operator via e-mail to the Operator's e-mail address info@avratek.com marked "Withdrawal of consent to the processing of personal data".

7. Cross-border transfer of personal data

7.1. The Operator, prior to the start of the cross-border transfer of personal data, is obliged to make sure that the foreign state to which the transfer of personal data is supposed to be carried out provides reliable protection of the rights of personal data subjects.

7.2. Cross-border transfer of personal data on the territory of foreign states that do not meet the above requirements may be carried out only if the personal data subject has written consent to the cross-border transfer of his personal data and/or the performance of the contract to which the personal data subject is a party.

8. Dispute Resolution

8.1. Before filing a lawsuit regarding disputes arising from the relationship between the Website User and the Website Administration, it is mandatory to submit a claim (a written proposal for voluntary settlement of the dispute).

8.2. The recipient of the claim shall, within 30 (thirty) calendar days from the date of receipt of the claim, notify the claimant in writing of the results of the claim review.

8.3. If no agreement is reached, the dispute shall be referred to a court in accordance with the applicable legislation of the Russian Federation.

8.4. This Policy and the relations between the User and the Website Administration shall be governed by the applicable legislation of the Russian Federation.

9. Final provisions

9.1. The User can get any explanations on the questions of interest concerning the processing of his personal data by contacting the Operator via e-mail info@avratek.com.

9.2. This document will reflect any changes to the Operator's personal data processing policy. The policy is valid indefinitely until it is replaced with a new version.

9.3. The current version of the Policy is freely available on the Internet at <http://avratek.com/privacy/>