

# Privacy Policy

Last updated 22.04.2024

JSC Positive Technologies ('we', 'Company') are experts in the protection of devices, infrastructures, and data, therefore we understand the importance of proper approach to privacy and security of information and adhere to the principle of comprehensive and complete protection of personal data. We are committed to protecting and respecting your privacy. We take all the reasonable efforts to ensure that we comply with all the applicable legislation in terms of privacy and personal data.

This page ('Policy') informs you of our policies regarding processing and protection of personal data. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

By visiting <https://knockin.ae> ('Website') or by using our PT Knocking service ('Service') you are unconditionally accepting this Policy and the terms of personal data processing specified herein. If you do not agree to this Policy, you must immediately cease the use of the Website and the Service.

Unless otherwise defined in this Policy, terms used in this Policy have the same meanings as in our [Terms of Use](#).

This Policy reveals how we process and protect your personal data provided to us when you use the Website and/or the Service. Besides, we may publish our general personal data processing policy and specific policies or consenting documents related to specific issues of personal data processing.

The Policy has been developed by the Company taking into account the legislation applicable in the country where the Company conducts its core business (Russia). At the same time, we also take into account the conditions of other regulations in the field of personal data. If you reside in a country in which the Company does not have a branch or representative office, and you believe that this Policy in any part does not or may not comply with your local laws, immediately stop using the Service.

## 1. What is personal data

We consider personal data to be any information relating to a defined or identifiable natural person (data subject). If we cannot in any way relate the information to a specific individual, we do not consider it personal data.

The Company does not verify the accuracy of the personal or other data provided by you and the legal capacity of the person who provided it. By accepting this Policy, you represent and warrant that: (a) the personal data you provide to us is yours; (b) any data that you provide to us is true, current, accurate, reliable and does not violate the laws of the Russian Federation and that provision of such data to the Company is lawful as required by applicable law. In the event that you transfer personal or other (commercial, business etc.) data of third parties ('subjects') to the Company, you (acting as an operator of the subjects' personal data) hereby represent and warrant that such transfer is legal and authorized in accordance with the requirements of applicable law, and that the subjects were properly notified of such transfer. Within five (5) working days from the Company's request, you undertake to provide the Company with information and/or documents confirming the legality and authorization of the above-mentioned transfer and the proper notification of the subjects.

## 2. Purposes of personal data processing

We adhere to the principles of sufficiency, reasonableness, and expediency of personal data processing. We process personal data in a lawful, fair and transparent manner.

We process your personal data collected through the Website and the Service (your use of it) **in order to conduct our core activities and to improve and develop the Company's business**. This implies the following situations where we process your data:

Description	Information	Processing period
To provide and maintain your access to the Website and the Service under the Terms of Use*	Email address, technical information** and usage data***	The term of your use of the Website and/or the Service, and up to five (5) years from the date of its last use
To get back to you	Name, surname, email address, details of your relationship with the Company, and other information you have provided to us about yourself through an application, email, or otherwise	Three (3) years from the date we sent you the last message (call) or from the day we received your message if we

		were never able to contact you
To send you promotional, informational and other materials	Last name, first name, telephone number, email address, information on position, division and current place of employment	During the validity period of your consent
To gather information and conduct satisfaction research for continual service improvement	Last name, first name, phone number, email address, identifiers in messengers and social networks, information about your position, division and current place of employment, technical information** and usage data***, information received as a result of your actions and communication with us	During the validity period of your consent

\*Your access to and use of the Website and the Service is provided under our Terms of Use. In that case we may use your personal data to provide the Service to you, to notify you about changes to our Website and Service, to provide user support, to detect, prevent and address technical issues, to monitor the usage of our Website and Service and to exercise our legal rights under the Terms of Use.

\*\* Technical information includes IP address, type of operating system, type of device (personal computer, cellphone, tablet), type of browser, geographical location, the fact of filling in the web form, internet service provider and alike.

\*\*\* Usage data includes information automatically received by us when you are using the Website or the Service, including through the use of cookies. Cookies are small files that can be automatically stored in your browser's memory by our Website, if you agree. This allows the Website to access and retrieve stored information on your computer as needed. For example, we use cookies so that we can remember the language you use on our Website - next time you use the Website, we can accommodate your preferences regarding its use. Most browsers automatically save cookies, but you can always change your browser settings to manage, delete or block cookies. You can see more about it in our [Cookie Policy](#).

### 3. How we process your data

**3.1. Principles.** We strictly adhere to the principle of data minimization - we do not collect, store, or otherwise process personal data unless it is really necessary.

We are also guided by the following principles of personal data processing:

- Processing personal data in a lawful, fair and transparent manner.
- Collecting personal data for a specific and clear purpose. Personal data may not be processed at any subsequent time in a manner incompatible with that purpose.
- Processing of personal data is sufficient and limited to the purposes for which the processing is carried out.
- Processing of accurate, reliable, and updated as necessary (as far as it depends on us) personal data.
- Providing appropriate measures and procedures to ensure that inaccurate or misleading personal data is deleted or corrected.
- Keeping personal data secure and protected against any breach, infringement, unlawful or unauthorized processing by establishing and applying appropriate technical and organizational measures and procedures in accordance with the applicable legislation.
- Personal data shall not be stored after the purpose of its processing has been achieved, unless otherwise provided for by applicable law.

**3.2. Data processing methods.** We may process personal data with or without the use of automation tools. Processing may include collection, recording, systematization, accumulation, storage, clarification (updating, modification), electronic copying, retrieval, receipt, use, transfer (provision, access), blocking, deletion, and destruction of personal data, etc.

**3.3. Collection of data.** For the above-mentioned purposes we can collect data in the following ways:

- When you provide us with your personal data (when you fill out forms, send us messages in writing, including email, etc.);
- When data is collected automatically by using technologies and services (such as web protocols, cookies, and web markers launched only when you enter your data (or take actions)).

**3.4. Use and storage of data.** We store personal data exclusively on properly secured media, including electronic media. The Company has the right to aggregate personal data into an information system and process it using other software tools. Work with personal data information systems is carried out according to the generally accepted algorithm (collection, systematization, accumulation, storage, clarification, use, blocking, destruction, etc.). Among other things, we may segment information according to specified criteria, contact you periodically via telephone (including mobile), email or internet, messengers.

**3.5. Third parties.** The Company may involve third parties in the processing of your personal data by entrusting third parties with its processing and/or by transferring your personal data to third parties. Third parties may be engaged only to achieve the purposes of personal data processing specified by us and are obligated not to disclose or use it for any

other purpose. Third parties may be engaged provided that such parties ensure the confidentiality and security of personal data during processing.

**Such third parties may include, but are not limited to:**

- Specific affiliated persons of the Company;
- Company's counterparties and/or counterparties of affiliated persons of the Company, if their products (goods, works, services) are necessary for the Company to achieve the purposes of personal data processing, including server-owners, service providers for making calls, sending SMS or any other types of mailings and notifications, entities providing services for conducting surveys and research, organizations providing web analytics systems, and others.

Third parties engaged by the Company in the processing of personal data are determined based on the existing relationship between the Company and you, as well as in accordance with the provisions of applicable law, contracts (agreements) between the Company and you, and your consent(s) to the processing of personal data.

**3.6. Cross-border transfer of data.** To achieve the purposes set out in the Policy, we may transfer your personal data to countries other than the country in which it is obtained. In case of cross-border data transfer, we protect your data in accordance with the Policy and applicable law. Countries to which cross-border data transfer takes place: Russian Federation (a party to the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data No. 108, has effective legislation in force in the field of personal data protection, as well as an appointed and acting independent state authority, personal data regulator).

**3.7. Data destruction.** By default, we destroy personal data once the purposes of processing have been achieved or no longer need to be achieved. In addition, we may destroy personal data in the following cases:

- If there is a threat to the security;
- If you violated the Policy or our Terms of Use;
- Upon expiration of the period of storage of personal data;
- Upon termination or expiration of your agreement with us;
- Upon your request or withdrawal of consent to the processing of personal data.

It is important to note that even if we receive a request from you to destroy personal data, we may continue to store and otherwise process it if this is necessary to comply with applicable law or we have other grounds for processing that personal data (such as an agreement we have entered into with you or a strict obligation).

Destruction of personal data shall be performed in a manner that excludes the possibility of recovery of such personal data. Confirmation of the fact of personal data destruction shall be carried out in accordance with the requirements established by the authorized body for the protection of the rights of personal data subjects.

**3.8. Notification about an incident.** We take all measures required by applicable law to protect your personal data and, where possible, best international practices in this area. Examples of such measures are listed in Section 5. Nevertheless, for objective reasons, regardless of the measures we apply, various incidents with the personal data may occur. In the event that such an incident occurs and we assume that your personal data may have been affected, we will notify you unless it would result in us breaching any applicable law.

#### 4. Your rights

The basic rules for processing personal data and your rights as a personal data subject are commonly detailed in the applicable law. In this Policy we wish to remind you about some of your basic rights:

<b>Right to receive information</b>	You can find out more details about the Company's processing of your personal data by submitting a request to us. In particular, you can learn about the types of personal data we process, data processing purposes, information on decisions made on the basis of automated processing (if applicable), third parties to whom your personal data may be disclosed (both in your country and abroad), our controls and standards regarding retention periods and processing of personal data, our procedures for clarifying, destroying personal data or establishing restrictions on their processing, protective measures we have in place for the cross-border transfer of your personal data. You also have the right to receive your personal data from us in structured and machine-readable form if the processing is based on your consent or is necessary for the fulfillment of contractual obligations and is carried out by automated means.
<b>Right to transfer data</b>	You can request the transfer of personal data to another data controller if this is technically possible.
<b>Right to update, correct or delete data</b>	You can ask us to correct inaccurate, incomplete, or outdated data or to remove it.
<b>Right to restrict processing data</b>	You can ask us to restrict and/or stop processing your data if you have concerns about its accuracy or the lawfulness of our processing, pending resolution of these issues.

<b>Right to object to processing data</b>	You can object to the processing of your data and/or request that we stop processing your data if it is for direct marketing purposes, is related to profiling or statistical and analytical research, or if you believe that it violates applicable law.
<b>The right to request the destruction of your data</b>	You have the right to request the destruction of your personal data if you believe that we have achieved the purpose of processing it, or that your data is no longer required to achieve that purpose, or that your data was collected unlawfully.
<b>The right to request that we continue to store your data</b>	You can ask us to continue to store your personal data even after the purposes of the processing have been fulfilled, if this is necessary for the protection of your rights, or to ensure the availability of evidence or if it is otherwise required for legal proceedings. However, we reserve the right to decline your request and to destroy your personal data in order to comply with the law and/or to avoid negative consequences for us.
<b>Right to withdraw consent</b>	You may withdraw your consent to the processing of personal data when you feel it is appropriate.

## 5. Information on personal data protection

All personal data you provide shall be confidential by default. To protect your personal data we take legal, organizational, and technical measures necessary and sufficient to ensure the requirements of applicable legislation in the field of personal data protection. We always try to protect your data as much as possible. The following are some of measures that we apply when we process personal data (including cross-border transfer of data):

- We provide you an opportunity to contact a person responsible for the processing of personal data in the Company by email: [pt@ptsecurity.com](mailto:pt@ptsecurity.com).
- We restrict access to your personal data and only provide it to those of our employees and partners who need it to fulfill the purposes for which we process your data.
- We regularly assess the risks related to the processing of personal data and take measures to eliminate or minimize them.
- We conduct internal investigations to uncover facts related to unauthorized access to personal data if it is suspected to occur.
- We use encryption methods when processing personal data, where applicable.
- We regularly monitor and analyze the security of the Company's network infrastructure.
- We provide the Company's employees with the provisions of applicable personal data legislation (including personal data protection requirements), the Company's local acts on personal data processing, and provide them with regular training.
- We organize a security regime for the premises where personal data media are located, preventing uncontrolled access to these premises or the stay of unauthorized persons in them.

## 6. Applications and requests from you

- 6.1. You may send the Company your requests, including requests regarding the processing of your personal data:
  - In writing to the address: 107061, 8 Preobrazhenskaya Ploschad, premise 60, Moscow, Russia; or
  - In the form of an electronic document send from your email which you specified to us (if any) to [pt@ptsecurity.com](mailto:pt@ptsecurity.com).
- 6.2. Your request must contain the following information so we can be sure it's coming from you:
  - Your last name, first name, email address;
  - Information confirming your relationship with the Company;
  - Details of your request (such as an unambiguous request to withdraw your consent);
  - Your signature (handwritten or electronic, as applicable).
- 6.3. The Company shall consider the received request and send a response to it to the address indicated in the request within 10 (ten) working days from the date of its receipt by us, if it concerns the processing of your personal data by the Company. If for some reason it takes us a little longer to respond, we will send you a message stating the reason for the delay.

## 7. Limitation of the Policy and its versions

- 7.1. You must be reasonable and responsible when posting your personal data in the public domain, leaving reviews and comments.
- 7.2. The Company is not responsible for the actions of third parties who have accessed your personal data if it was caused by your actions.
- 7.3. The Company has the right to update this Policy as necessary. The policy will be revised in case of significant changes in international or national legislation in the field of personal data.
- 7.4. The current version of this Policy can be found at: <https://knockin.ae/docs/privacy-policy-knockin-en-ae.pdf>.

## 8. Contact information and details of the Company

Full company name: Joint-Stock Company Positive Technologies

Address: 107061, 8 Preobrazhenskaya Ploschad, premise 60, Russia, Moscow

Phone: +7 495 744 01 44

Email: [pt@ptsecurity.com](mailto:pt@ptsecurity.com)