

## PERSONAL DATA PROCESSING POLICY

### DEFINITIONS AND TERMS

The site — <https://ecg.ru/>

The company – Medical Computer Systems Ltd.

User — a person using the Company's Website.

E-mail — [info@ecg.ru](mailto:info@ecg.ru).

### Introduction

Our personal data handling policy and procedures have been developed in line with the requirements of the 1995 European Union Data Protection Directive (Directive 95/46/EC) and the General Data Protection Regulation and applicable national law.

#### 1. What personal data do we collect?

We collect and process personal data about you when you interact with us. The personal data we process includes:

- Name;
- Username and encrypted password;
- Email address and telephone number;
- Profession;
- Academic degree;
- Information related to the browser used, device and operating system;
- Records of calls to and / or any other information provided.

#### 2. How do we use this personal data and what is the legal basis for this use?

We process the personal data listed in paragraph 1 above for the following purposes:

- to establish and fulfill a contract with you, for example, if you make a purchase from us or enter into an agreement to provide or receive services. We require this information in order to enter into a contract with you and are unable to do so without it;
- to comply with applicable law and regulation;
- in accordance with our legitimate interests in protecting company's legitimate business interests, role as the National Standards Body, and legal rights, including but not limited to, use in connection with legal claims, compliance, regulatory and investigative purposes (including disclosure of such information in connection with legal process or litigation);
- with your express consent to respond to any comments or complaints we may receive from you, or to investigate any complaints received from you or from others, about our website or our services;
- we may use information you provide to personalise (i) our communications to you; (ii) our website; and (iii) services for you, in accordance with our legitimate interests;
- to monitor use of our websites and online services. We may use your information to help us check, improve and protect our products, content, services and websites, both online and offline, in accordance with our legitimate interests;

- if you provide a credit or debit card, we may also use third parties (such as POS payment providers) to check the validity of the sort code, account number and card number you submit in order to prevent fraud, in accordance with our legitimate interests and those of third parties;
- we may monitor any customer account to prevent, investigate and/or report fraud, terrorism, misrepresentation, security incidents or crime, in accordance with applicable law and our legitimate interests;
- in circumstances where you contact us by telephone, calls may be recorded for quality, training and security purposes, in accordance with our legitimate interests; and
- we may use your information to invite you to take part in market research or surveys.

We may also send you direct marketing in relation to company's relevant services. Electronic direct marketing will only be sent where you have given your consent to receive it, or (where this is allowed) you have been given an opportunity to opt-out. The user agrees to the newsletter by agreeing to the terms of the privacy policy and user agreement.

### **3. With whom and where will we share your personal data?**

We may also share your personal data with search engine and web analytics.

Personal data may be shared with government authorities and/or law enforcement officials if required for the purposes above, if mandated by law or if needed for the legal protection of our legitimate interests in compliance with applicable laws.

### **4. How long will you keep my personal data?**

The company keeps personal user data for at least 10 years, in accordance with the product life cycle, to provide high-quality and timely service.

### **5. Where is my data stored?**

Personal data, in accordance with national law, is stored on the territory of the Russian Federation. Further information may be obtained by e-mail.

### **6. What are my rights in relation to my personal data?**

You have the right to ask us not to process your personal data for marketing purposes. The user can be unsubscribed from the newsletter in user's profile, upon receipt of a letter or by contacting the company by e-mail.

If the information we hold about you is inaccurate or incomplete, you can notify us and ask us to correct or supplement it.

You also have the right, with some exceptions and qualifications, to ask us to provide a copy of any personal data we hold about you.

In some circumstances you can ask us to erase your personal data (a) by withdrawing your consent for us to use it; (b) if it is no longer necessary for us to use your personal data; (c) if you

object to the use of your personal data and we don't have a good reason to continue to use it; or (d) if we haven't handled your personal data in accordance with our obligations.

**7. Where can I find more information about company's handling of my data?**

Should you have any queries regarding this Privacy Notice, about company's processing of your personal data or wish to exercise your rights you can contact company's Privacy Team using email address.