

## **POLICY ON PERSONAL DATA PROCESSING**

### 1. General provisions

1.1 SWI Inc. (hereinafter referred to as the Operator) places respect for the rights and freedoms of citizens as one of the most important conditions for carrying out its activities.

1.2 The Operator's Policy on Personal Data Processing (hereinafter referred to as the Policy) applies to all information that the Operator may obtain about visitors to the Website. Personal data is processed in accordance with the Federal Law "On Personal Data" No 152-FZ (hereinafter referred to as the Personal Data Law).

1.3. The Operator, not being a resident of the Russian Federation, carries out cross-border transfer of Personal Data of each User, observing all necessary measures for their protection.

### 2. Basic concepts used in the Policy:

2.1 **Website** – a set of graphic and information materials, as well as computer programmes and databases, ensuring their availability on the Internet at the network address <https://swc.capital;>

2.2 **User** – a natural person, a legally capable person, or a legal entity duly registered on the Website. By joining to this Policy, the User certifies that he/she is not a US tax resident;

2.3 **Personal data** – any information relating directly or indirectly to identified or identifiable natural person (personal data subject);

2.4 **Personal data processing** – any action (operation) or set of actions (operations) with personal data, performed with or without the use of automation tools. The personal data processing includes, but is not limited to:

2.5 Depersonalization of Personal Data – actions which result in the impossibility to determine the belonging of Personal Data to a particular User or person without the use of additional information;

2.6 Dissemination of Personal Data – any actions resulting in disclosure of Personal Data to an indefinite number of persons;

2.7 Provision of Personal Data – any actions that result in disclosure of Personal Data to a certain circle of persons;

2.8 Destruction of Personal Data – any action resulting in irretrievable destruction of Personal Data on a computer or any other media.

### 3. The Operator can process the following Personal Data:

- 3.1 Name and Surname
- 3.2 Phone number
- 3.3 E-mail address
- 3.4 IP address
- 3.5 Scan copies/photos of passport
- 3.6 Citizenship
- 3.7 Date of birth
- 3.8 Address
- 3.9 Additional phone number
- 3.10 Additional address
- 3.11 Country of birth
- 3.12 Sex
- 3.13 Skype installation details
- 3.14 The Website also collects and processes anonymised visitor data (including cookies) using Internet statistics services (Yandex Metrica and Google Analytics and others).
- 3.15 Confirmation of parental rights

#### 4. Purposes of Personal Data Processing

4.1 The Operator may use the User's personal data for the purposes of:

- 4.1. Identification of the User registered on the Website.
- 4.2. Establishing feedback with the User, including sending notifications, enquiries regarding the use of the Website, processing requests from the User.
- 4.3. Providing the User with effective customer and technical support in case of problems related to the use of the Website.
- 4.4. Providing the User, with their consent, with information about promotions, newsletters and other information.
- 4.5. Notifying the User of new products and services, special offers and various events with the User's consent. The User can always opt out of receiving information messages by sending a letter to the Operator to the following address [PrivacyPolicy@swc.capital](mailto:PrivacyPolicy@swc.capital) or to the Data Protection Officer at [dpo@swc.capital](mailto:dpo@swc.capital).
- 4.6. Improvement of the quality of User service and modernisation of the Operator's Website by processing requests and applications from the User.
- 4.7. Statistical and other studies based on anonymised information provided by the User.
- 4.8. Conclusion, execution of contracts with the User.

#### 5. Legal Basis for Personal Data Processing

5.1 The Operator processes the User's Personal Data only if it is submitted by the User via the forms located on the Website. By submitting his/her Personal Data to the Operator, the User expresses his/her consent to this Policy.

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

## 6. Procedure for collection, storage, transfer and other types of processing of Personal Data

6.1 The Operator ensures the safety of Personal Data and takes all possible measures to exclude access to Personal Data by unauthorised persons.

6.2 The Operator is entitled to entrust the Personal Data processing to a third party with the consent of the User, unless otherwise provided for by the current legislation of the Russian Federation, on the basis of a contract concluded with it.

6.3 The third party processing Personal Data on behalf of the Operator is obliged to comply with the principles and rules of Personal Data processing stipulated by the Personal Data Law, ensuring confidentiality and security of Personal Data during its processing. The Operator controls compliance with the requirements of Regulation N 2016/679 of the European Parliament and of the Council of the European Union "On the protection of individuals with regard to the personal data processing and on the free circulation of such data and repealing Directive 95/46/EC (General Regulation on the protection of personal data)", the Personal Data Law and other applicable legislation, taking into account the priority of application of the domestic legislation of the Russian Federation.

6.4 In case of inaccuracies in Personal Data, the User may update it by sending a notification to the Operator by e-mail to the Operator's e-mail address [PrivacyPolicy@swc.capital](mailto:PrivacyPolicy@swc.capital), or to the Data Protection Officer at [dpo@swc.capital](mailto:dpo@swc.capital), with mark "Personal data update"

6.5 The period for Personal Data processing is unlimited. The User may withdraw their consent to the Personal Data processing at any time by sending a notice to the Operator by e-mail to the Operator's e-mail address [PrivacyPolicy@swc.capital](mailto:PrivacyPolicy@swc.capital) or to the Data Protection Officer at [dpo@swc.capital](mailto:dpo@swc.capital), with mark "Withdrawal of consent to the personal data processing".

## 7. Final Provisions

7.1 The User may obtain any clarifications on issues of interest regarding the processing of their Personal Data by contacting the Operator via e-mail [PrivacyPolicy@swc.capital](mailto:PrivacyPolicy@swc.capital) or the Data Protection Officer at [dpo@swc.capital](mailto:dpo@swc.capital).

7.2 This document will reflect any changes to the Operator's Personal Data processing policy. In case of significant changes, the User may be sent information to the e-mail address specified by the User.

SWI Inc. registration number 2120849, registered office: Wickhams Cay II, Road Town, Tortola, VG1110, British Virgin Islands