

## **PRIVACY STATEMENT**

### **Our Privacy Commitments**

FIPRA Unternehmensberatung GmbH; iceur and Strategy implemented GmbH (all together “we”) cooperate under the umbrella of “Insight Russia” and respect the privacy of every person, who visits, registers with or subscribes to our websites and online publications (“you”), and are committed to ensuring a safe online experience.

This Privacy Statement outlines the information we may collect about you in relation to your use of our websites and related publications and services (“personal data”) and how we may use that personal data. It also outlines the methods by which we and our service providers may (subject to necessary consents) monitor your online behavior in order to deliver customized advertisements and marketing materials and other tailored services. This Privacy Statement also tells you how you can verify the accuracy of your personal data and how you can request that we delete or update it.

This Privacy Statement applies to all websites operated by us (as indicated on the relevant website) (“**Sites**”). Please note that the Sites may contain links to external sites and may contain advertisements for, and/or the opportunity for you to purchase products or services from third parties. This privacy statement does not cover the activities of such third parties, and you should consult those third party sites` privacy policies for information on how your data is used by them.

By accessing and using the Sites you are agreeing to the terms of this Privacy Statement.

### **Information about us**

Insight Russia is a service, provided by FIPRA Unternehmensberatung GmbH, iceur and Strategy Implemented GmbH, all three registered in Vienna under Austrian Law

All our principal business activities are:

- political analysis
- Business-to-Business consulting services
- strategy development and consulting services
- organization of relevant seminars and congresses

### **Name of the Data Controller**

The Data Controller is FIPRA Unternehmensberatung GmbH and is subject to the ECG and the Austrian Data Protection Act

### **Collection of Personal Data**

Our primary goal in collecting personal data from you is to give you an enjoyable customized experience whilst allowing us to provide services and features that most likely meet your needs.

We collect certain personal data from you, which you give to us when using our Sites and/or registering or subscribing for our products and services. However, we also give you the option to access our Sites` home pages without subscribing or registering or disclosing your personal data.

We also collect certain personal data from other group companies to whom you have given information through their websites. Please note that we do not intend to collect any personal data from children under thirteen years of age and no child under thirteen should submit any personal data to any of the Sites. Should we discover that any such personal data has been delivered to any of the Sites, we will remove that information as soon as possible.

## **Types of Personal Data Held and its Use**

### **1. Customer Services and Administration**

At some Sites, we collect personal data such as your name, job title, work and/or home address, and telephone number and email address in order to register you for access to certain content and subscriptions. This information may be supplemented with demographic information from your use of our Sites such as your postal area, age, gender, purchasing preferences and interests.

This information is used to administer and deliver to you the products and/or services you have requested, to operate our Sites efficiently and improve our service to you, and to retain records of our business transactions and communications. By using the Sites and submitting personal information through the registration process you are agreeing that we may collect, hold, process and use your information (including personal information) for the purpose of providing you with the Site services and developing our business, which shall include (without limitation) the purposes described below in paragraphs 2 and 3.

### **2. Monitoring use of our Sites**

Where, as part of our Site services, we enable you to post information or materials on our Site, we may access and monitor any information, which you upload or input, including in any password-protected sections. Subject to any necessary consents, we also monitor and/or record the different Sites you visit and actions taken on those Sites, e.g. content viewed or searched for. This information may be used for one or more of the following purposes:

- to fulfil our obligations to you;
- to improve the efficiency, quality and design of our Sites and services;
- to see which articles, features and services are most read and used
- to track compliance with our terms and conditions of use,
- for marketing purposes (subject to your rights to opt-in and opt-out of receiving certain marketing communications) - see paragraph 3 below;
- for advertising purposes, although the information used for these purposes does not identify you personally. Please see paragraph 5 below for more details;
- to protect or comply with our legal rights and obligations.

### **3. Marketing:**

Some of your personal data collected under paragraphs 1 and 2 above may be used by us and/or our other group companies and third party service providers to contact you by email, fax, telephone and/or post for sending information or promotional material on our products and/or services and/or those of our other group companies.

We give you the opportunity to opt-out of receiving marketing communications and will in certain circumstances need to obtain your consent before sending such communications to you. Further detail can be found on the applicable Site and in each marketing communication

sent by us, our group companies or service providers. See also "Consents and opt-outs" section below.

#### 4. **Trading in Personal Data:**

Some of your personal data may be collected and processed with the intention of selling it to other organizations, but this will not be done unless you have given your consent (separately to this privacy statement).

#### 5. **Cookies and similar technologies**

All our Sites use cookies and similar technical tools to collect information about your access to the Site and the services we provide.

Cookies are pieces of information which include a unique reference code that a website transfers to your device to store and sometimes track information about you. A number of cookies we use last only for the duration of your web session and expire when you close your browser. Other cookies are used to remember you when you return to the Site and will last for longer. Cookies cannot be used to run programs or deliver viruses to your computer. They are uniquely assigned to you and can only be read by a Web server in the domain that issued the cookie.

We may use cookies to:

- remember that you have used the Site before; this means we can identify the number of unique visitors we receive to different parts of the Site. This allows us to make sure we have enough capacity for the number of users that we get and make sure that the Site runs fast enough;
- customize elements of the layout and/or content of the pages of Site for you;
- record activity on our Sites so that we understand how you use our Sites enabling us to better tailor our content, services and marketing to your needs;
- collect statistical information about how you use the Site so that we can improve the Site; and
- gather information about the pages on the Site that you visit, and also other information about other websites that you visit, so as to place you in a "market segment". This information is only collected by reference to the IP address that you are using, but does include information about the county and city you are in, together with the name of your internet service provider. This information is then used to place interest-based advertisements on the Site which it is believed will be relevant to your market segment.

Most web browsers automatically accept cookies but, if you prefer, you can change your browser to prevent that or to notify you each time a cookie is set. You can also learn more about cookies in general by visiting [www.allaboutcookies.org](http://www.allaboutcookies.org) which includes additional useful information on cookies and how to block cookies using different types of browser. Please note however, that by blocking, deleting or turning off cookies used on the Site you may not be able to take full advantage of the Site.

**Email tracking:** So that we can better understand our users' needs, we track responses to our emails - for example, to see which links are the most popular in newsletters, and to log and follow up responses to our marketing messages. To do this, we use pixel GIFs, also known as

"pixel tags" - these are small image files that are placed within the body of our email messages. They enable us to tell if a message has been opened and to track click-throughs on links within the message.

Any other purposes for which we wish to use your personal data will be notified to you and your personal data will not be used for any such purpose without obtaining your prior consent.

### **Consents and opt-outs**

You can give your consent to or opt out of particular uses of your data as indicated above by:

- Indicating at the point on the relevant Site where personal data is collected;
- Informing us by email, post or phone; or
- Updating your preferences on the applicable Site;

For turning cookies and similar technologies on and off, see the information in paragraph 5 above.

### **Disclosures**

Information collected at one Site may be shared between the three companies listed above.

Your personal data may also be sold to other companies in the form of lists and directories, but only after permission from you in accordance with the provisions above.

We may also disclose your personal data to other third parties, including, without limitation, professional advisers, or governmental or State institutions or regulatory authorities, where necessary in order to exercise or defend legal rights or where required by law.

We may transfer, sell or assign any of the information described in this policy to third parties as a result of a sale, merger, consolidation, change of control, transfer of assets or reorganization of our business.

### **Confidentiality and Security of Your Personal Data**

We are committed to keeping the data you provide us secure and will take reasonable precautions to protect your personal data from loss, misuse or alteration.

The transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features described above to try to prevent unauthorized access.

We have implemented information security policies, rules and technical measures to protect the personal data that we have under our control from:

- unauthorised access
- improper use or disclosure
- unauthorised modification
- unlawful destruction or accidental loss

All our employees, contractors and data processors (i.e. those who process your personal data on our behalf, for the purposes listed above), who have access to, and are associated with the processing of your personal data, are obliged to keep the information confidential and not use it for any other purpose than to carry out the services they are performing for us.

We also give you the option of using a secure transmission method to send us personal data identifiers, such as credit card details and bank account number.

### **How to Access, Update and Erase your Personal Information**

If you wish to know whether we are keeping personal data about you, or if you have an enquiry about our privacy policy or your personal data held by us, in relation to any of the Sites, you can contact the Data Protection Officer via:

- Postal mail to this address: FIPRA Unternehmensberatung GmbH, Kärntner Ring 4-7, A-1010 Vienna, Austria.
- Telephone: +43 (1) 489 75 07
- Email: office@insightrussia.eu

we will provide you with a readable copy of the personal data which we keep about you. We may require proof of your identity and may charge a small fee (not exceeding the statutory maximum fee that can be charged) to cover administration and postage.

We allow you to challenge the data that we hold about you and, where appropriate in accordance with applicable laws, you may have your personal information:

- erased
- rectified or amended
- completed

### **Changes to this Privacy Statement**

We will occasionally update this Privacy Statement to reflect new legislation or industry practice, company changes and customer feedback. We encourage you to review this Privacy Statement periodically to be informed of how we are protecting your personal data.

Vienna January 2015