

COOKIE PROCESSING POLICY

This Cookie Processing Policy (hereinafter referred to as the “Policy”) of POLATI Limited Liability Company registered address: 141006, Russian Federation, Moscow Oblast, Mytishchi, Olimpiyskiy Prospekt, 29a, office 402 (hereinafter – the “Operator”) is developed in accordance with the Operator’s Personal Data Processing Policy and defines the Operator’s policy regarding the processing of cookies collected and processed by the Operator when Users visit and use the website located on the Internet at: <https://polati.ru/> (hereinafter – the “Website”).

1. TERMS AND DEFINITIONS

Operator – POLATI Limited Liability Company (POLATI LLC), located at: 141006, Russian Federation, Moscow Oblast, Mytishchi, Olimpiyskiy Prospekt, 29a, office 402.

User – an individual who is directly or indirectly identified or identifiable through personal information (data) (including individuals with the status of sole proprietors), who is a visitor of the Website (including both potential and active Users).

Website – a combination of graphic and informational materials, as well as software and databases that provide for the public display of information and data, united by a common purpose and made accessible on the Internet at the address: <https://polati.ru/>. The Website is the property of the Administrator.

Cookies – a small piece of data sent by a web server and stored on the User’s computer. Each time the web client or web browser attempts to access a page of the corresponding website, this data is sent back to the web server in an HTTP request. The content of such a file may or may not constitute personal data, depending on whether it contains identifiable information or only anonymized technical data.

IP address – a unique network address of a node in a computer network built using the IP protocol.

Personal data – information that relates directly or indirectly to an identified or identifiable individual.

Data processing – collection, recording, systematization, accumulation, storage, updating, transfer, use, blocking, anonymization, deletion, and destruction of personal data.

Consent – the User’s voluntary expression of will allowing the processing of their personal data, including data contained in cookies, in accordance with Federal Law No. 152-FZ “On Personal Data” (hereinafter – “FZ-152”).

2. GENERAL INFORMATION ABOUT COOKIES

2.1. Purpose and function.

Cookies are a widely used web technology that allows:

- saving settings and preferences established by the User during previous visits to the Website;
- store information about the User's actions and preferences to optimize their interaction with the Website;
- analyzing User behavior and visit statistics for the purpose of improving Website functionality;
- providing personalized content and offers based on the User’s interests;
- enabling security and authentication functions.

2.2. Information security.

Cookies cannot:

- contain viruses or malware;
 - run programs on the User's device;
 - transmit information to other websites without the User's participation;
 - access the device's system files.
- 2.3. Cookies set by one website are not accessible by other websites due to browser security principles.
- 2.4. The Operator may use other technologies, including web beacons and JavaScript, which may work together with cookies and other tools to provide unique identification of the User's device. These and other technologies help ensure full use of the Website's features. The Operator may also use such technologies to determine whether a User has opened an email or clicked on a link in the email.
- 2.5. When visiting the Website, the User may unintentionally receive cookies from third-party websites or web servers – so-called “third-party” cookies. This happens because the visited Website may contain such elements as images, maps, audio files, or links to other web pages located on domains hosted on other servers.
- 2.6. Cookies do not damage your device and allow us to provide you with faster and better navigation on the Website. Their purposes may vary – from authentication to storing information about the User's configuration for access to this server and other functions on the Operator's Website.

3. TYPES OF COOKIES

3.1. The types of cookies used on the Website are presented in the table below. Other user documents on the Website may provide for the use of additional types of cookies.

Cookie category	Classification	Processing purposes	Consent required
Technical (strictly necessary)	Session-based	User session identification, login support, attack prevention, basic site navigation	NO (necessary for functionality)
Technical (strictly necessary)	Persistent	Saving site configuration settings, server load balancing, technical support and diagnostics	NO (necessary for functionality)
Analytics (Performance)	Session-based	Collecting anonymous visit statistics, analyzing performance of specific pages, identifying technical issues and errors	YES (contain identifiers)
Analytics (Performance)	Persistent	Tracking user behavior between sessions, analyzing traffic sources, identifying trends, generating reports, optimizing content	YES (contain identifiers and are shared with third parties)
Functional	Persistent	Saving user preferences for personalized experience, autofill of forms, remembering content access settings	YES (contain user information)
Advertising (marketing)	Persistent	Tracking interests for targeted advertising, retargeting on other websites, limiting ad frequency, measuring ad ROI, audience building	YES (contain identifiers and are shared with ad networks)

- 3.2. For the proper functioning of the Operator's Website and for conducting statistical research and reviews, the Operator uses cookies collected from Users of the Operator's Website (such as location data; OS type and version; browser type and version; device type and screen resolution; referral source; OS and browser language; user actions on the site; IP address).
- 3.3. The Operator may process cookies using automated means through the following operations: collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (provision, access), anonymization, blocking, deletion, and destruction.
- 3.4. The Operator will process cookies from the date the User accepts this Policy / begins using the Website, and until the stated processing purposes are achieved or until the User refuses further processing of cookies, considering the cookie lifespan.
- 3.5. The Operator uses the information contained in cookies only for the purposes specified above. Afterward, the data collected will be stored on the Operator's device for a period depending on the type of cookie, but not exceeding the time necessary to fulfill its purpose, after which it will be automatically deleted from the Operator's system.
- 3.6. The Operator informs the User, and the User, by continuing to use the Website, agrees that for achieving the stated purposes, the Operator may use third-party analytics services, such as Yandex.Metrica, and may transfer cookies to the service owner, OOO Yandex (address: Russian Federation, 119021, Moscow, 16 Lva Tolstogo St., INN (Tax Identification Number) 7736207543).
- 3.7. The Operator takes all necessary technical, organizational, and legal measures to ensure the protection of the User's data (including cookies) from unauthorized or accidental access, destruction, modification, blocking, copying, dissemination, and other unlawful actions.
- 3.8. Technical security measures are implemented by the Operator in accordance with applicable legislation, the current level of technology, the nature of the processed information, and the risks associated with its processing.

4. USER'S REFUSAL TO CONSENT TO COOKIE PROCESSING

- 4.1. The User has the right at any time to fully or partially withdraw their consent to the processing of their cookies by sending a written request to the Operator.
- 4.2. To opt out of the use of cookies, the User has the right to adjust their browser settings to disable the use of cookies. Completely disabling cookies may lead to limited functionality of the Website.
- 4.3. In the event of refusal to process cookies, the User is informed of the need to either stop using the Website or disable cookies in the browser settings.
- 4.4. Please note that essential cookies are required to ensure the proper operation and security of the Website. Unfortunately, these types of cookies cannot be disabled, but the User may delete them after finishing their session on the Website. To manage cookies through your browser or device, please refer to the instructions provided by the browser developer or device manufacturer used by the User (for User convenience, some browser instructions are provided below).
- 4.5. The User may manage cookie usage by changing the settings of their web browser (depending on the type of browser used):
- 4.5.1. Google Chrome. Menu → Settings → Privacy and Security → Cookies and Other Site Data
Link: <https://support.google.com/chrome/answer/95647>
- 4.5.2. Mozilla Firefox. Menu → Options → Privacy & Security → Cookies and site data.
Link: <https://support.mozilla.org/ru/kb/udalenie-fajlov-cookie>
- 4.5.3. Safari (macOS/iOS). Settings → Privacy → Cookies and site data.
Link: <https://support.apple.com/ru-ru/guide/safari/sfri11471/mac>

4.5.4. Yandex Browser. Menu → Settings → Websites → Cookies and access permissions

Link: <https://browser.yandex.ru/help/personal-data-protection/cookies.html>

4.5.5. Microsoft Edge. Settings → Privacy, search and services → Cookies and other site data

Link: <https://support.microsoft.com/ru-ru/microsoft-edge/>.

5. FINAL PROVISIONS

5.1. This Policy is subject to periodical amendments or supplements. If any changes are made to the Policy, the updated version of the Policy will be published at the following address — https://polati.ru/en/footer/cookie_policy_doc. In this case, POLATI LLC will not notify Users of such changes by sending any special notifications. The User is advised to regularly review this page to stay informed about the current version of the Policy. Any changes to the Policy shall take effect from the moment they are posted at the address https://polati.ru/en/footer/cookie_policy_doc.

5.2. For matters concerning POLATI LLC's processing of Users' data not covered by this Policy, the User may be guided by POLATI LLC's Personal Data Processing Policy, located at https://polati.ru/en/footer/cookie_policy_doc.

5.3. This Policy and the relations between the User and the Operator arising in connection with the application of this Policy shall be governed by the law of the Russian Federation.