

PRIVACY POLICY

Sonoray LLC (hereinafter “we” or “us”) is a legal entity incorporated and operating under the legislation of the Russian Federation. We run <https://medzona.com> website (hereinafter the “Website”).

This Privacy Policy (hereinafter the “Policy”) determines and describes how we collect, storage, transfer or use information of the individuals visiting the Website. We pay great attention to securing the data you provide us with and ensure its protection in strict compliance with applicable laws and regulations. “Personal Data” covers any information we may obtain when you use the Website.

The Policy is an indispensable part of the [User Agreement](#) (hereinafter the “Agreement”) and by using or accessing the Website you fully accept the terms of the Agreement and give your consent to the processing of your personal data in accordance with terms of this Policy. If you do not agree to the Agreement and/or the Policy, please do not use the Website and exit immediately

Commented [A1]: Ссылка пользовательское соглашение сайта

1. Types of Personal Data we collect

In the process of accessing the Website you may provide us with the following Personal Data:

- 1.1. name,
- 1.2. email,
- 1.3. telephone number,
- 1.4. certain technical data, which is automatically collected from your device or web browser during interaction with the Website that includes your IP addresses, time of visit, referrer headers, data identifying your web browser and version, browser settings, operational system and web beacons and tags,
- 1.5. cookies.

We use all this information in accordance with the Agreement and the Policy primarily for online sales purposes and for other actions listed below.

2. Reason we use Personal Data

We may collect and process the Personal Data from you for the following purposes:

- 2.1. to provide functionalities, services, content and features of the Website to you;
- 2.2. to provide relevant marketing. We use your Personal Data to notify you about events, services and other promotional information that may be interesting to you;
- 2.3. to operate and maintain our business, products and services. We use the Personal Data for accounting, market analysis and other internal functions. We may use personal data about how you use the Website and its services to enhance your browsing experience, address technical and service problems or administer the Website and for analytics and metrics about visitors of the Website;
- 2.4. to protect our legitimate rights and interests, property and/or safety. We may also use the Personal Data to comply with legal or regulatory inquiries in order to prevent or detect fraud, abuse, illegal use, violations of the Agreement, as well as to comply with court orders, governmental requests or applicable laws and regulations;
- 2.5. other purposes. We may also use the Personal Data in other ways and will provide specific notice at the time of collection and obtain your consent where necessary.

3. Storage of Personal Data

- 3.1. We will only retain your Personal Data for as long as necessary for the purposes for which that information was collected as prescribed in this Policy (unless a longer retention period is required by applicable law). We will permanently delete your Personal Data or make it anonymous by removing all details that identify you after the processing it.

- 3.2. All collected Personal Data are electronically stored, and appropriate measures and procedures are applied in order to prevent unauthorized access and maintain the appropriate level of protection and use.
- 3.3. You consent to the transfer and storage of the Personal Data on our servers located on the territory of the Russian Federation. If you are located in a jurisdiction where transfer of your Personal Data to another jurisdiction requires your consent, then by using the Websites you provide us with your express and unambiguous consent to such transfer, storage, and/or processing of the information in other jurisdictions, including Russia. Since Russia is a jurisdiction outside the European Economic Area, which has not been recognized by the European Commission as providing an adequate level of personal data protection, we take appropriate measures to ensure the Personal Data is handled according to applicable EU data protection rules.

4. Protection of Personal Data

We take reasonable and appropriate administrative, technical, organizational, physical security and risk management measures in accordance with market standards and applicable laws to ensure that your Personal Data is adequately protected against accidental or unlawful destruction, manipulation, damage, loss, alteration, unauthorized or unlawful access, disclosure or misuse, or any other unlawful form of Personal Data processing. Our facilities containing Personal Data have control access. The technology safeguards are continuously adapted and improved in line with technological developments. We regularly conduct training and awareness programs on security and privacy, to ensure that our employees and contractors learn and maintain the necessary knowledge and skills to effectively protect your Personal Data. Unfortunately, no data transferred over the Internet is guaranteed to be completely secure and so you provide it at your own risk.

5. Your rights with respect to Personal Data

You have the right to:

- 5.1. access to your Personal Data;
- 5.2. obtain an electronic copy of your Personal Data or transfer it to another organization;
- 5.3. rectify your Personal Data if it is incomplete or inaccurate;
- 5.4. delete or restrict processing of your personal data in certain circumstances provided by applicable law. There may be exceptions to this right for specific legal reasons.
- 5.5. withdraw your consent where you have provided us with consent to use your Personal Data.

If you like would to exercise any of your rights or request a copy of your personal data, please send us an e-mail to medzonarussia@gmail.com. You can also send us your inquiries regarding the use of the personal data in writing to:

SONORAY,
BULVAR CHERNOMORSKIY, 7, KORP. 1, AP. 4,
MOSCOW,
117639, RUSSIAN FEDERATION

We will consider your request and respond within 30 days from the receipt of such request. We can ask you to prove your identity if we doubt your trustworthiness. We can also deny the request upon legitimate reasons or to charge a small fee for it to be completed.

6. Marketing Communications

You can opt out of any marketing communications from our side, by following the unsubscribe link in the relevant communication or contacting us at medzonarussia@gmail.com.

7. Cookies

Cookies are small files stored in the memory of your device, designed to correctly display of the Website's content and for the convenience of browsing. The cookies collect information in a way that does not directly identify anyone. We use cookies to analyze how users use the Website and to

improve it. We also use cookies to provide statistical “ratings” information in aggregated form to our partners and other third parties about how our users collectively use the Website. Third parties may also collect information via the Website through cookies, third party plug-ins and widgets. These third parties collect data directly from your web browser and the processing of this data is subject to their own privacy policies. In some cases you can manage the use of cookies by changing your browser’s cookie settings.

We may also use third-party services such as Google Analytics and Yandex.Metrica to obtain data for analysis of the Website traffic and share Personal Data with such third parties subject to prior depersonalization of this information

8. Children Personal Data

We knowingly do not collect personal data of underage users. If you are a parent or a legal guardian of an underage child, and you know that the child has provided us with their personal information without your consent, please contact us on: medzonarussia@gmail.com.

9. Amendments

We reserve the right to modify or amend the Policy at our own discretion from time to time without notice. If continue to use the Website following the posting of changes to the Policy you accept those changes.

10. Transfer of Personal Data to Third Parties

Except for cases explicitly prescribed herein We do not share any Personal Data with third parties unless upon a legitimate request from law enforcement and regulatory or government agencies in connection with any inquiry, subpoena, court order, or other legal or regulatory procedures with which we are legally bounded to comply. We may also share Personal Data to establish or protect our legal rights, property, or safety, or the rights, property, or safety of others, or to defend against legal claims.

11. Applicable Law

The laws of the Russian Federation govern the interpretation of this Policy and apply to claims for breach of them regardless of conflict of laws principles. You consent to exclusive jurisdiction and venue in courts sitting in Moscow, Russia. This Policy is in full compliance with the provisions of the European Union General Data Protection Regulation (“GDPR”), the California Consumer Privacy Act of 2018 (“CCPA”) and other applicable regulations in force. We act both as the controller and the processor of the Personal Data as these terms are defined in the GDPR.

12. Contacs

Sonoray LLC
BULVAR CHERNOMORSKIY, 7, KORP. 1, AP. 4,
MOSCOW,
117639, RUSSIAN FEDERATION

If you have any questions, concerns or suggestions with respect to this Policy, please contact our private policy officer by post or by email at info@medzona.com.