Privacy Notice

*Last Revised: November 1, 2019*

This privacy notice (“Privacy Notice”) describes how EMIS CJSC and its subsidiaries and affiliates that link to this Privacy Notice – each entity data controller – (“EMIS”, “our,” “us” or “we”) may collect, use and share information relating to you as an identified or identifiable natural person (“Personal Data”).

Please read this entire privacy notice carefully before using our websites, email notifications, mobile applications, social media applications, widgets, and our other online services (the “Services”) because it will help you understand what data we collect, how we use and share it, and what your choices are with respect to that data.

About Us  
«EMIS» CJSC is registered in the Russia, as a corporation in the Chelyabinsk region, Kazantsevo, 7/1 Proizvodstvennaya St., 454518 Post code.

Contacting Us

If you want to exercise your data privacy rights as stated below or you have any questions about this Privacy Notice, our contact information is as follows:

Russia, Chelyabinsk region, Kazantsevo, 7/1 Proizvodstvennaya St., 454518 Post code.

Email: [sales@emis-meter.com](mailto:sales@emis-meter.com)

Overview

The Services of EMIS’s subsidiaries and affiliated companies are each owned, operated and provided by such subsidiaries and companies. However, this Privacy Notice ONLY governs the use of EMIS company Services that specifically link to this Privacy Notice. Other EMIS company Services may link to or otherwise provide their own, separate notice.

Our privacy practices may vary among the countries in which we operate to reflect local practices and legal requirements.

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| **Personal Data we collect** | We collect Personal Data and non-personal information you provide us to make a purchase, request information or updates on our products or services, or otherwise use the Services. We automatically collect Personal Data and non-personal information about how you use the Services and your preferences. |
| **How we use your Personal Data** | We use your information, including your Personal Data for the following purposes: To provide you with the Services you have requested, improve our Services, market our products, and make note of your preferences in order to provide the best user experience possible. |
| **Legal Bases for the processing and the consequences if you do not provide your Personal Data** | We rely on certain legal grounds for the collection, processing, and use of your Personal Data, such as the processing that is necessary to provide you with products or services.  In general, the provision of your Personal Data is voluntary, but in certain cases it is necessary. |
| **How we share your Personal Data** | We may share your Personal Data with our subsidiaries, affiliates and other third parties worldwide to inform you about products and offers that may be of interest to you, as permitted by applicable law.  We may also share your Personal Data with our service providers worldwide, who are required to treat your Personal Data in accordance with this Privacy Notice, as required by law and in certain other situations when using such service providers to provide Personal Data or services to you through our Services. |
| **International Data Flow** | Some countries or jurisdictions may not provide the same level of data protection as the country in which your Personal Data was originally collected, however we will take steps to continue to appropriately protect your Personal Data. |
| **Your Rights and Choices** | In case you are located in the EEA you may have a number of rights in relation to your Personal Data. These include a right to access, correct and erase your Personal Data as well as more technical rights to restrict the way we process it, and to transfer your Personal Data. |
| **How long we keep your Personal Data** | We don't keep your Personal Data for any longer than we need to. |

Personal Data Collection

Through your use of the Services, we may collect Personal Data from you (especially, if you choose to provide it), including without limitation:

* Your name, email, username, phone number, company and address, (“Contact Information”);
* Your credit card number, billing address, shipping address, security code and other payment transaction and verification details (“Payment Information”);
* Pages and products viewed, items added to your shopping cart, ads that you clicked on, emails from us that you opened, browser type, operating system ("OS"), Internet Protocol ("IP") address and device and location information (collectively, “Analytical Information”);
* Publicly available information about you from third-party sources, such as the postal service for shipping address verification;
* Your mobile OS, a mobile device identifier embedded by us, or other commonly used mobile device identifiers.

We may collect your Personal Information or usage data from third parties, including without limitation:

* Your email address and other collected Personal Data about you may be forwarded to EMIS by a third-party website when you request for EMIS to contact you through such third-party website;
* Your Personal Data may be forwarded to EMIS when you choose to participate in a third-party application or feature, such as live chat, one of our social media pages or a similar application or feature on a third-party website;
* Additional Personal Information may be forwarded to EMIS from third parties to combine with the Personal Information we collect through your use of the Services in order to enhance our ability to serve you, to focus content we provide to you and to offer you opportunities to purchase products or services that we believe may be of interest to you based upon the information we have collected.

We will apply the terms of our Privacy Notice to any Personal Data received from a third party, unless we have disclosed to you otherwise.  EMIS is not responsible for these third parties' dissemination of your Personal Data.

How we use your Personal Data

We may use your Personal Data for the following purposes, as permitted by applicable law:

* Purchases: We may use your Contact Information and Payment Information to allow us to process and fulfill purchases you make through the Services.
* Customer Service: We may use your Contact Information to receive and respond to your questions about products, services or warranties and to communicate with you about contests, surveys or sweepstakes. To address your questions, we may also request your industry and/or the name and address of the dealer that sold you our product.
* Feedback: We may use your username, email address, products purchased, and other user-generated content you may provide when you rate and review our products.
* Website Registration: We may use your Contact Information when you create an account through any of our Services in order to provide you a more personalized user experience.
* Analytics: When you use the Services, we automatically collect and use Analytical Information in order for us to continually improve your experience with our Services and to target marketing and advertising of our Products to you.
* Marketing: We may use your Personal Data to determine what products may be of interest to you, provide you with marketing communications (unless you have opted out of such communications) and to conduct market research. We may also use information you provide us, including your industry, whether you own our product, experience with our products, and user-generated content, for these marketing purposes.
* Location-Based Services: We may use your current location, provided address and/or zip code to provide you the location of the retailer of our products or other appropriate information.

We may also use your Personal Data in other ways that are consistent with the above-described purposes and to otherwise administer our websites and provide our Services to you.

Legal Bases for the Processing and Consequences  
We rely on the following legal grounds for the collection, processing, and use of your Personal Data:

* the processing is necessary to provide the Services as requested by you;
* your consent;
* the processing is necessary for the performance of a contract to which you are a party or to take steps at your request prior to entering into a contract;
* the processing is necessary for compliance with a legal obligation to which we are subject;
* the processing is necessary for the purposes of the legitimate interests pursued by us or by a third party, except (for residents of the European Economic Area (“EEA”)) where such interests are overridden by the interests or fundamental rights and freedoms of you which require protection of personal data; such legitimate interests are the fulfilment of the processing purposes set out above.

In general, the provision of your Personal Data is voluntary, but in certain cases it is necessary in order to enter into a contract with us or to receive our products or services as requested by you.

Not providing your Personal Data may result in disadvantages for you – for example, you may not be able to receive certain products and services. However, unless otherwise specified, not providing your Personal Data will not result in legal consequences for you.

Security  
We maintain appropriate technical and organizational measures to protect your Personal Information, including assuring that third-party service providers who access or handle Personal Information on our behalf and affiliates maintain such safeguards. We seek to encrypt credit card numbers from e-commerce transactions conducted on our website using secure socket layer ("SSL") technology.

However, no method of Internet transmission or electronic storage is 100% secure or error-free, so it is not possible to guarantee absolute security. You must protect against unauthorized access to your password and to your computer, and be sure to sign off when finished using a shared computer. If you have reason to believe that your interaction with us is no longer secure (e.g., if you feel that the security of any account you might have with us has been compromised), please immediately notify us by email [sales@emis-meter.com](mailto:sales@emis-meter.com) or by calling us at [+7.351.729.9912](tel:+13146798984).

Where we have given you or you have chosen a password which enables you to access certain portions of our websites, you are responsible for keeping this password confidential. You should not share your password with anyone.

International Data Flow  
The Personal Data that we collect or receive about you may be transferred to and/or processed by bodies that are located inside or outside the EEA.

Some of the recipients of your Personal Data (see also below) are certified under the EU-U.S. Privacy Shield and others are located in countries with adequacy decisions (in particular, Canada (for non-public organizations subject to the Canadian Personal Data Protection and Electronic Documents Act) and Argentina), and, in each case, the transfer is thereby recognized as providing an adequate level of data protection from a European data protection law perspective (see Art. 45 General Data Protection Regulation – "GDPR").

Other recipients might be located in countries which do not adduce an adequate level of protection from a European data protection law perspective (in particular, the USA (if not certified under the EU-U.S. Privacy Shield).  We will take all necessary measures to ensure that transfers out of the EEA are adequately protected as required by applicable data protection law. With respect to transfers to countries not providing an adequate level of data protection, we will base the transfer on appropriate safeguards, such as standard data protection clauses adopted by the European Commission or by a supervisory authority (Art. 46(2)(c) or (d) GDPR), approved codes of conduct together with binding and enforceable commitments of the recipient (Art. 46 (2)(e) GDPR), or approved certification mechanisms together with binding and enforceable commitments of the recipient (Art. 46 (2)(f) GDPR). You can ask for a copy of such appropriate safeguards by contacting us as stated above under the section Contacting Us.

Cookies  
We use “cookies,” a small text file transferred to your device, along with similar technologies (e.g., internet tag technologies, web beacons and embedded scripts) to help provide you with a better, more personalized user experience. To learn more about how we use cookies and to change your cookie settings, please click here.

Personal Data Shared with Third Parties  
We only share your Personal Data with companies, organizations and individuals outside of EMIS as described below.

* Recipients within the EMIS Group and Third Parties. We may share your Personal Data with EMIS’s affiliates and other companies worldwide, including our unaffiliated dealers, manufacturers, and suppliers in order for these companies to contact you about their products, services or other offerings that may be of interest to you. We may also share your Personal Data with certain business partners. Depending on the categories of Personal Data and the purposes for which the Personal Data has been collected, different entities and the internal departments within these entities may receive your Personal Data. For example, our IT department may have access to your account data, and our marketing and sales departments may have access to your account data or data relating to product orders. Moreover, other departments within the EMIS Group may have access to certain Personal Data about you on a need to know basis, such as the legal and compliance department, the finance department or internal auditing. This Privacy Notice does not govern unaffiliated third-party websites or any other website that does not link to this Privacy Notice.
* Service Providers. We may share your Personal Data with affiliated and unaffiliated companies that perform tasks on our behalf related to our business. Such tasks include processing payments, fulfilling orders, delivering packages, locational services, analyzing website or mobile application usage data, customer service, electronic and postal mail service, contests/surveys/sweepstakes administration, marketing services, social commerce and media services (e.g., ratings, reviews, forums), and calculating, managing and reporting sales tax. Third-party service providers receive your Personal Data as necessary to perform their role, and we instruct them not to use your Personal Data for any other purposes.
* As Required or Appropriate by Law. We will use and disclose your Personal Data as permitted by applicable law, including without limitation:
  + Under applicable law, including laws outside your country of residence, to comply with legal processes and to respond to requests from public and government authorities, including public and government authorities outside your country of residence;
  + To enforce our terms and conditions, including investigations of potential violations thereof;
  + To detect, prevent or otherwise address fraud, security or technical issues;
  + To protect our operations or those of any of our affiliates; to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others; and to allow us to pursue available remedies or limit the damages that we may sustain.
* Business Transfers. As we continue to develop our business, we might sell or buy brands, stores, subsidiaries or business units. We may share and/or transfer your Personal Data with a third party in such transactions (including without limitation, any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, brands, affiliates, subsidiaries or other assets). Customer information generally is one of the transferred business assets, but remains subject to any preexisting applicable Privacy Notice.

We may share aggregated data that has been anonymized (so that you are not identified) with third parties – like publishers, advertisers or connected websites – and may make this data publicly available.  For example, we may share information publicly to show trends about the general use of our services or products.

Public Forums  
Our websites may offer publicly accessible blogs, message boards, or community forums. You should be aware that any information you provide in these areas may be read, collected, and used by others who access them.

Links to Social Networking and other Third-Party Websites  
Our Services may contain links to social networking and other websites and mobile applications that are operated and controlled by third parties. While we try to link only to websites that share our high standards and respect for privacy, we do not take responsibility for the content or the privacy practices employed by other websites. Unless otherwise stated, any Personal Data you provide to any such third party website will be collected by that party and not by us, and will be subject to that party’s privacy policy (if any), rather than this Privacy Notice. In such a situation, we will have no control over, and shall not be responsible for, that party’s use of the Personal Data you provide to them.

Your Choices and rights  
In case you are located in the EEA when accessing the Services, or the data controller as further described above in the section Overview is located in the EEA, the following applies:

If you have declared your consent regarding certain collecting, processing and use of your Personal Data (in particular regarding the receipt of direct marketing communication via email, SMS/MMS, fax, and telephone – where applicable), you can withdraw this consent at any time with future effect. Further, you can object to the use of your Personal Data for the purposes of marketing.

Please note that the above-mentioned rights might be modified under the applicable data protection law. Below please find further information on your rights to the extent that the GDPR applies (for avoidance of doubt the following applies only in case you are located in the EEA when accessing the Services or the data controller as further described above in the section Overview is located in the EEA):

(i)    Right to request access to your Personal Data

You may have the right to obtain from us confirmation as to whether or not Personal Data concerning you is being processed, and, where that is the case, to request access to the Personal Data. This access information includes the purposes of the processing, the categories of Personal Data concerned, and the recipients or categories of recipient to whom the Personal Data have been or will be disclosed.

You may have the right to obtain a copy of the Personal Data undergoing processing. For further copies requested by you, we may charge a reasonable fee based on administrative costs.

(ii)    Right to request rectification

You may have the right to obtain from us the rectification of inaccurate Personal Data concerning you. Depending on the purposes of the processing, you may have the right to have incomplete Personal Data completed, including by means of providing a supplementary statement.

(iii)    Right to request erasure (right to be forgotten)

Under certain circumstances, you may have the right to obtain from us the erasure of Personal Data concerning you and we may be obliged to erase such Personal Data.

(iv)    Right to request restriction of processing

Under certain circumstances, you may have the right to obtain from us restriction of processing your Personal Data. In such case, the respective data will be marked and may only be processed by us for certain purposes.

(v)    Right to request data portability

Under certain circumstances, you may have the right to receive the Personal Data concerning you, which you have provided to us, in a structured, commonly used and machine-readable format and you may have the right to transmit those data to another entity without hindrance from us.

(vi)    Right to object

Under certain circumstances, you may have the right to object, on grounds relating to your particular situation, at any time to the processing of your Personal Data by us and we can be required to no longer process your Personal Data. Such right to object may especially apply if EMIS collects and processes your Personal Data for profiling purposes in order to better understand your business interests in EMIS's products and services. Further you may object to the use of your data for direct marketing purposes. If you have a right to object and you exercise this right, your Personal Data will no longer be processed for such purposes by us. To exercise this right please contact us as stated above under the section Contacting Us.

However, such a right to object may in particular not exist if the processing of your Personal Data is necessary to take steps prior to entering into a contract or to perform a contract already concluded.

In case you have given us your consent for direct marketing purposes (e.g., you actively subscribed to our newsletters) you can withdraw your consent as described at the top of this section.

(vii)    Other rights in connection with automated decision-making

Furthermore, under certain circumstances with respect to automated individual decision-making, you have the right to obtain human intervention, express your point of view, and contest the decision.

You also may have the right to lodge a complaint with the competent data protection supervisory authority. You can execute this right at a supervisory authority in particular in the EEA Member State of your habitual residence, place of work or place of the alleged infringement.

How long we keep your data  
Your Personal Data will be retained as long as necessary to provide you with the services and products requested. Once you have ended your relationship with us, we will either delete your Personal Data or anonymize your Personal Data, unless statutory retention requirements apply (such as for taxation purposes). We may retain your contact details and interests in our products or services for a longer period of time if you have allowed us to send you marketing materials. We may also retain your Personal Data after the termination of the contractual relationship if your Personal Data is necessary to comply with other applicable laws or if we need your Personal Data to establish, exercise or defend a legal claim, on a need to know basis only. To the extent possible, we will restrict the processing of your Personal Data for such limited purposes after the termination of the contractual relationship.

Children  
In compliance with the Children's Online Privacy Protection Act, 15 U.S.C., §§ 6501-06 and 16 C.F.R., §§ 312.1-312.12, our website does not permit children under 13 years of age to become users, and we do not intentionally collect information from children. By using our website, you represent that you are 13 years of age or older.

Changes  
We may update this Privacy Notice from time to time. We will notify you of any such changes, including when they will take effect, by updating the "Last revised” date above or as otherwise required by applicable law.