

# PRIVACY POLICY

## WE RESPECT YOUR PRIVACY

We commit to ensuring the privacy of all our users at the website [www.free.navalny.com](http://www.free.navalny.com) (Website).

This Privacy Policy governs all pages on the Website ([www.free.navalny.com](http://www.free.navalny.com)). It does not apply to pages hosted by other organizations, related organizations or third party sites. The Website may be linked to the websites of such other parties but those other sites may have their own privacy policy which applies to them.

Our Website may be used without entering personal information. Different rules may apply to certain services on our Website, however, and are explained separately below. We collect personal information from you (e.g. country of residence, city and email address) in accordance with the provisions of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation, GDPR). The provisions below serve to provide information as to the manner, extent and purpose for collecting, using and processing personal information by the provider.

Please be aware that data transfer via the internet is subject to security risks and, therefore, complete protection against third-party access to transferred data cannot be ensured.

## COOKIES

Our Website makes use of so-called cookies in order to recognize repeat use of our Website by the same user/internet connection subscriber. Cookies are small text files that your internet browser downloads and stores on your computer. They are used to improve our Website and services. In most cases these are so-called "session cookies" that are deleted once you leave our Website.

To an extent, however, these cookies also pass along information used to automatically recognize you. Recognition occurs through an IP address saved to the cookies. The information thereby obtained is used to improve our services and to expedite your access to the Website.

You can prevent cookies from being installed by adjusting the settings on your browser software accordingly. You should be aware, however, that by doing so you may not be able to make full use of all the functions of our Website.

## SERVER DATA

For technical reasons, we collect data that your internet browser transmits to us or to our web space provider (so-called server log files), such as the following:

- type and version of the browser you use;
- operating system;
- websites that linked you to our site (referrer URL);
- websites that you visit;
- date and time of your visit;
- your Internet Protocol (IP) address.

This anonymous data is stored separately from any personal information you may have provided, thereby making it impossible to connect it to any particular person. The data is used for statistical purposes in order to improve our Website and services.

## PURPOSE OF REGISTERING

We offer you the opportunity to sign up for our Website. The information entered when signing up, as shown in the registration form, is collected and stored solely for use by our Website. When signing up for our Website, we also store your IP address and the date and time you registered. This serves to protect us in the event a third party improperly and without your knowledge makes use of your data to sign up for our site. None of this information is transferred to third parties except email addresses that may be passed on to third parties for newsletter purposes (see the Newsletter section below).

When registering, we ask you to confirm that you are familiar with the Privacy Policy and agree with it. By checking the corresponding box, you confirm your consent to the fact that your personal data will be processed in accordance with the privacy policy of our Website, and also confirm that you have reached the age of 16.

Personal data received for sending newsletters will be stored until the moment when the registration is canceled by the person who provided the data. Newsletter distribution may be terminated. In this case, the personal data collected for these purposes will be destroyed.

## NEWSLETTER

Registration on the Website (when you indicate the country of residence and email address) means your consent to subscribe to our newsletter. The newsletter provides you periodically with information about our services, events, new videos, etc. For you to receive our newsletter, we require you to provide a valid email address and your country of residence. We will review the email address you provide for the purpose of determining whether you are in fact the owner of the email address provided or whether the actual owner of said address is authorized to receive the newsletter. When subscribing to our newsletter, we will store your IP address as well as the date and time you subscribed. This serves to protect us in the event a third party improperly and without your knowledge makes use of your email address to subscribe to our newsletter. We will not collect any other data. The data thereby collected is used solely for the purpose of receiving our newsletter. Nor is any of this information matched to any information that other components of our Website may collect. You may cancel your subscription to the newsletter at any time. You will find additional details in the email confirming your subscription as well as in each newsletter.

For the purpose of sending newsletters, personal data (email address) can be transferred to a third party without further notice of the person who provided his data. In this case, only the email address is transmitted to the third party. The third party does not receive any other personal data obtained during registration on the Website or in the process of using it. The transfer of personal data (email address) to a third party is carried out in accordance with the rules established by the GDPR.

## CONTACTING US

On our Website we offer you the opportunity to contact us by email [free@navalny.com](mailto:free@navalny.com). In such a case, information provided by the user is stored for the purpose of facilitating communications with the user. No data is transferred to third parties, nor is any of this information matched to any information that may be collected by other components of our Website.

## USE OF GOOGLE ANALYTICS WITH ANONYMIZATION

Our Website uses Google Analytics, a web analysis service from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94 043 USA, hereinafter referred to as "Google". Google Analytics employs so-called "cookies", text files that are stored to your computer in order to facilitate an analysis of your use of the site.

The information generated by these cookies, such as time, place and frequency of your visits to our site, including your IP address, is transmitted to Google's location in the US and stored there.

We use Google Analytics with an IP anonymization feature on our Website. In doing so, Google abbreviates and thereby anonymizes your IP address before transferring it from member states of the European Union or signatory states to the Agreement on the European Economic Area.

Google will use this information to evaluate your usage of our site, to compile reports on website activity for us, and to provide other services related to website and internet usage. Google may also transfer this information to third parties if this is required by law or to the extent this data is processed by third parties on Google's behalf.

Google states that it will never associate your IP address with other data held by Google. You can prevent cookies from being installed by adjusting the settings on your browser software accordingly. You should be aware, however, that by doing so you may not be able to make full use of all the functions of our Website.

Google also offers a disabling option for the most common browsers, thus providing you with greater control over the data which is collected and processed by Google. If you enable this option, no information regarding your website visit is transmitted to Google Analytics. However, the activation does not prevent the transmission of information to us or to any other web analytics services we may use. For more information about the disabling option provided by Google, and how to enable this option, visit <https://tools.google.com/dlpage/gaoptout?hl=en>

## USE OF RECAPTCHA

In order to protect input forms on our site, we use the reCAPTCHA service of Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94 043 USA, hereinafter referred to as "Google". By means of this service it can be distinguished whether the corresponding input is of human origin or is created improperly by automated machine processing.

To our knowledge, the referrer URL, the IP address, the behaviour of the website visitors, information about the operating system, browser and length of stay, cookies, display instructions and scripts, user input behaviour and mouse movements in the reCAPTCHA checkbox are conveyed to Google.

Google uses the information obtained, among other things, to digitize books and other printed matter as well as to optimize services such as Google Street View and Google Maps (e.g. house number and street name recognition).

The IP address provided as part of reCAPTCHA is not merged with other data from Google unless you are logged into your Google Account at the time the reCAPTCHA plug-in is used. If you want to prevent this transmission and storage of data by "Google" about you and your behaviour on our Website, you must log out of "Google" before you visit our site or before using the reCAPTCHA plug-in.

The use of the reCAPTCHA service is according to the Google Terms of Use: <https://www.google.com/intl/de/policies/privacy/>

## USE OF YOUTUBE COMPONENTS WITH ENHANCED DATA PROTECTION MODE

On our Website we use components (videos) of YouTube, LLC 901 Cherry Ave., 94066 San Bruno, CA, USA, a company belonging to Google Inc., Amphitheatre Parkway, Mountain View, CA 94043, USA.

To this end, we use the "enhanced data protection mode" option provided by YouTube.

When you display a page that has an embedded video, a connection will be made to the YouTube server and the content will appear on our Website via a communication to your browser.

According to the information provided by YouTube, in "enhanced data protection mode", data is only transferred to the YouTube server, in particular which of our Websites you have visited, if you watch the video. If you are logged onto YouTube at the same time, this information will be matched to your YouTube member account. You can prevent this from happening by logging out of your member account before visiting our Website.

Further information about data protection by YouTube is provided by Google under the following link: <https://www.google.de/intl/de/policies/privacy/>

## USING PAYPAL AS A PAYMENT METHOD

If, while completing your donation, you decide to use PayPal as an online payment service, your contact details will be sent to PayPal during the order process. PayPal is a service from PayPal (Europe) S.à.r.l e- Cie. SCA, 22-24 Boulevard Royal, L-2449 Luxembourg. PayPal assumes the function of an online payment service and trustee, and offers buyer protection services.

The personal data transmitted to PayPal usually includes your first name, last name, address, telephone number, IP address, email address, or other data required to process your order, such as the quantity of articles ordered, the article number, invoice amount, percentage taxes and invoice details, etc.

This information needs to be transferred to process your order using your chosen payment method, mainly in order to confirm your identity and manage your payment and the customer relationship.

Please note the following however: PayPal may also pass on your personal data to subcontractors or other affiliates, to the extent necessary for fulfilling the contractual obligations arising from your order or for processing personal data in your order.

Depending on the payment type you pre-select in your PayPal account, which may include payment by invoice or direct debit, PayPal will transfer the personal data transferred to PayPal to credit agencies. The information transferred serves to identify you and to verify your creditworthiness with regard to the order you have placed. Please refer to the PayPal Privacy Policy for more information on the credit agencies PayPal transfers data to and which data is collected, processed, stored and passed on by PayPal: <https://www.paypal.com/de/webapps/mpp/ua/privacy-full>

## USING STRIPE AS A PAYMENT METHOD

We use Stripe for the purpose of processing incoming payments. Stripe is a service from Stripe, Inc, 185 Berry Street, Suite 550, San Francisco, CA 94 107, USA. Your data will be sent to a server operated by Stripe, Inc in the United States.

You can find more information about Stripe here: <https://stripe.com/privacy>

Stripe also participates in and has certified its compliance with the EU-U.S. Privacy Shield Framework. For more information and to view the Privacy Shield policy, go here: <https://www.privacyshield.gov/participant?id=a2zt00000000LIHMAAOe&status=Active>

## USE OF GOOGLE ADS

For purposes of promotion, our website also employs Google Ads. As part of this, our website employs the analysis service "Conversion-Tracking" from Google Inc., 1600 Amphitheatre Parkway, Mountain View, CA 94 043 USA, hereinafter referred to as "Google". If you access our site by way of a Google ad, a cookie is placed on your computer. Cookies are small text files that your internet browser downloads and stores to your computer. These so-called "conversion cookies" cease to be active after 30 days and are not used to identify you personally. If you visit certain pages of our Website while the cookie is still active, we and Google know that you, as a user, have clicked on ads placed on Google and were redirected to our site. Google uses the information obtained through "conversion cookies" to compile statistics for our website. These statistics tell us the total number of users who have clicked on our ad as well as which pages of our site were then accessed by each user. However, neither we nor other advertisers who use "Google-Adwords" receive any kind of information that can be used to personally identify users. You can prevent the installation of "conversion cookies" by making the appropriate change to your browser settings, for example by setting your browser so that the automatic placement of cookies is deactivated or by blocking cookies from the domain "googleadservices.com".

You can obtain the relevant data privacy policy from Google at the following link: <https://services.google.com/fh/files/misc/sitestats/de.html>

## INFORMATION / CANCELLATION / DELETION

You may contact us free of charge if you have questions regarding collection, processing or use of your personal information, if you wish to request the correction, blocking or deletion of your personal information or deletion of your personal information explicitly granted consent, please note that you have the right to have your data corrected or deleted, provided that such claim is not barred by any legal obligation to retain this data.

If you wish to exercise any of these rights or have any questions about this policy, feel free to contact us at [free@navalny.com](mailto:free@navalny.com) using the email provided during registration.

## THE RIGHT TO LODGE A COMPLAINT WITH A SUPERVISORY AUTHORITY

The person who provided his personal data has the right to lodge a complaint with the supervisory authority, created in accordance with the requirements of the GDPR.