COOKIE POLICY

of EN+ HOLDING ILLC

(dated June 1, 2026)

The Cookie Policy (hereinafter referred to as the "Policy") is applied in addition to the general Policy regarding the processing of personal data and describes the types of Cookies, the purposes for which they are used, how EN+ Holding, International Limited Liability Company (Taxpayer Identification Number (INN) 3906395843, registered address: 8 Oktyabrskaya St., office 31, Kaliningrad, Kaliningrad Region, 236006) processes data collected during the use of the website https://netzero.ru by Visitors, and the methods by which one can refuse the processing of Cookies.

1. TERMS AND DEFINITIONS

The following terms are used in the Policy:

Company means International Limited Liability Company EN+ HOLDING (INN 3906395843, registered address: 8 Oktyabrskaya St., office 31, Kaliningrad, Kaliningrad Region, 236006).

Website means a combination of computer software and hardware that enables the publication of information and data unified by a common purpose for public viewing, utilising technical means used for communication between computers on the Internet. The Website's address on the Internet: https://netzero.ru.

Website visitor (Visitor) means a person who visits and uses the Website.

Yandex means Limited Liability Company YANDEX (INN 7736207543, 16 Leo Tolstoy St., Moscow, 119021).

Cookies mean small pieces of data that the Website requests from the browser used on the Visitor's computer or mobile device. Cookies reflect the Visitor's preferences or actions on the Website, as well as information about their device, date and time of session. Cookies are stored locally on the Visitor's computer or mobile device. The Visitor can delete saved Cookies in the settings of the relevant browser. Cookies that allow for the identification of a specific Visitor (combined with an IP address, account data, and website behaviour profile) are personal data.

IP-address means the unique network address of a node in an IP-based computer network.

Personal data mean any information that directly or indirectly relates to a particular identified or identifiable individual (personal data subject).

2. GENERAL PROVISIONS

2.1. On their first visit to the Website, the Visitor is presented with a banner notifying them of the collection of Cookies and requesting their consent to process those Cookies. The banner contains the following options:

'Accept all' to consent to the use of all categories of Cookies, including analytical ones;

'Only essential' to reject all cookies except strictly necessary (technical) ones.

2.2. By clicking the 'Accept All' button in the banner, the Visitor consents to the processing of all categories of Cookies, including analytical cookies and the use of the Yandex.Metrica service.

Until the Visitor consents to the use of analytical Cookies, the Company does not use such Cookies and does not activate the Yandex.Metrica web analytics service. In the absence of consent, only strictly necessary (technical) Cookies required for the functioning of the Website are processed.

2.3. The Visitor has the right to refuse the use of analytical Cookies:

on their first visit, by clicking the 'Only required' button;

in their browser settings, by changing your browser settings to block or delete Cookies.

Refusal of analytical Cookies must not restrict access to the primary functionality of the Website.

To disable cookies or change cookie settings in your browser, you can use the information provided at the following links:

Microsoft Edge: https://support.microsoft.com/ru-ru/windows/управление-файлами-cookie-в-microsoft-edge-просмотр-разрешение-блокировка-удаление-и-использование-168dab11-0753-043d-7c16-ede5947fc64d

Google Chrome: https://support.google.com/chrome/answer/95647?hl=en

Firefox: https://support.mozilla.org/en-US/kb/clear-cookies-and-site-datafirefox

Safari: https://help.apple.com/safari/mac/8.0/#/sfri11471

2.4. This Policy applies to the Website only. The Company does not control and is not responsible for third-party websites that the Visitor may access via links available on the Website.

3. DATA PROCESSING ON THE WEBSITE

3.1. The Policy sets forth the Company's obligations to maintain confidentiality and ensure the protection of the privacy of Visitor data that the Company may receive during the Visitor's visit to the Website.

3.2. The Company processes data that is automatically transmitted to it when a Visitor views the Website pages on which the system's statistical script ('pixel') is installed:

IP address;

information about the browser and access software (browser type and version, operating system);

page address (URL);

access time;

referrer (address of the previous page);

device data (device model, screen resolution);

geolocation determined by IP address;

other information from Cookies (depending on the type of Cookies specified in Clause 4 of this Policy).

The specified data (IP address, information from Cookies) in aggregate may allow identification of a specific Visitor and, therefore, constitutes personal data.

3.3. The Website implements the Yandex.Metrica web analytics service, provided by Yandex, under the following terms:

3.3.1. The Yandex.Metrica web analytics service uses Cookies. Until the Visitor's consent is received (by clicking the 'Accept all' button), the Yandex.Metrica service is not activated and does not collect data.

3.3.2. Information about the Visitor's use of the Website collected using Cookies is transferred to Yandex and stored on Yandex servers located in the Russian Federation. Yandex processes the information received to evaluate the Visitor's use of the Website and to compile reports on the Website's activities.

All personal data collected through Cookies (including IP addresses and device identifiers) is processed and stored on servers physically located within the Russian Federation.

The Company ensures compliance with legal requirements regarding the localisation of personal data and uses only those analytics services that store data within the Russian Federation.

3.3.3. When using the Yandex.Metrica service, the following categories of data may be processed:

IP address;

Cookies (the list is provided in Appendix 1 to this Policy);

browser and device data (browser type and version, operating system, device model, screen resolution);

geolocation determined by IP address;

information about actions on the Website (pages viewed, clicks, transitions, scrolling, time on page);

session recordings (with Webvisor enabled).

The list of data may be clarified in accordance with Yandex documents specified in Clause 3.3.4 of this Policy.

3.3.4. The transfer of personal data collected using Cookies to Limited Liability Company YANDEX is carried out on the basis of an agreement (personal data processing assignment) in accordance with Article 6, Part 3, Article 18, and Article 18.1 of Federal Law No 152-FZ dated July 27, 2006, 'On Personal Data'. Yandex processes the specified personal data solely for the purpose of providing the Company with a web analytics service and under the terms and conditions specified in the specified agreement and the following Yandex documents:

Cookies Policy: https://yandex.ru/legal/cookies_policy;

Terms of use of the Yandex.Metrica service: https://yandex.ru/legal/metrica_termsofuse;

Privacy Policy: https://yandex.ru/legal/confidential.

By clicking the ‘Accept all’ button in the banner, the Visitor agrees to the processing of the Visitor’s data by Yandex in the manner and for the purposes specified in this section.

4. TYPES OF COOKIES USED BY THE COMPANY

4.1. Functional classification of cookies

The Company uses the following types of cookies in terms of their functionality and consent requirements:

Strictly necessary (technical) cookies are the minimum set of cookies that are required for the proper functioning of the Website and to ensure security. These cookies do not require the Visitor’s consent, as they are essential for the proper functioning of the Website.

Examples: storing authorisation data, ensuring connection security.

Analytical/Statistical Cookies include information about how the Visitor uses the Website. For example, which pages the Visitor views, which links they click, how much time they spend on the pages. The main purpose of such Cookies is to improve the functionality of the Website and understand user behaviour.

The use of analytical cookies requires the prior consent of the Visitor.

Examples: Yandex.Metrica (subject to data localisation in the Russian Federation).

4.2. Classification of Cookies by Storage Time

Session Cookies exist only in temporary memory during the time the Visitor remains on the Website page. Browsers typically delete session Cookies after the Visitor closes the Website window. Session Cookies allow the Website to remember information about the Visitor’s choice on the previous page of the Website to avoid the need to re-enter information.

Persistent Cookies are cookies that are stored on the Visitor’s computer and are not deleted when the browser is closed. Persistent Cookies can store user preferences for the Website, allowing those preferences to be used in future browsing sessions. Such cookies allow the Visitor to be identified as a unique user of the Website, and when returning to the Website, they help to recall information about the Visitor and previously completed actions.

4.3. A detailed list of cookies used by the Company, their purpose, ownership (own/third-party), type and storage periods are provided in the Appendix to this Policy.

5. PURPOSES OF VISITOR DATA COLLECTION

5.1. Cookies are used by the Company for the purposes of analytics and improving the quality of the Website, which means:

ensuring the correct operation of the Website and its functionality;

analysis of traffic and behaviour of Visitors to improve the Company’s services;

implementation of statistics and analytics.

5.2. The processing of personal data obtained using analytical cookies, including data collected by the Yandex.Metrica service, is carried out on the basis of the consent provided by the personal data subject (clause 1 of part 1 of article 6, article 9 of Federal Law No 152-FZ dated July 27, 2006), expressed by clicking the 'Accept all' button in the banner.

Information about Visitor's actions is processed to improve the Company's services, conduct statistical and marketing analysis, assess the demand for the Website's functions (services), and improve the structure and content of the Website.

The processing of such information is not aimed at the automated provision of information using recommendation technologies within the meaning of Article 10.2-2 of the Federal Law No 149-FZ dated July 27, 2006, 'On Information, Information Technologies and the Protection of Information'.

5.3. The Website does not utilise information technologies designed to provide information based on the collection, systematisation and analysis of data related to the individual preferences of Internet users for the purpose of generating personalised recommendations within the meaning of Article 10.2-2 of the Federal Law No 149-FZ dated July 27, 2006, 'On Information, Information Technologies and Information Protection'.

In the event that such recommendation technologies are implemented, the Company will publish a separate document on the Website establishing the rules for the application of recommendation technologies, and will otherwise fulfil the requirements of the specified Federal Law.

6. VISITOR'S RIGHTS

6.1. The Visitor has the right to:

decline the use of analytical Cookies (except those strictly necessary for the functioning of the Website);

change their Cookies settings in the browser at any time;

request information about which Cookies are used on the Website and for what purposes;

revoke consent to the processing of Cookies by changing browser settings or contacting the Company;

obtain information about how the Company processes their personal data collected through Cookies;

Exercise other rights of the personal data subject, as provided for in Articles 14 and 21 of Federal Law No 152-FZ dated July 27, 2006, including with respect to personal data processed using Cookies and Yandex.Metrica: request access to their personal data, demand their clarification, blocking, or destruction if there are grounds stipulated by law.

6.2. To exercise their rights, the Visitor may contact the Company using the contact information specified in Section 8 of this Policy.

The procedure for exercising the rights of a personal data subject is described in detail in the Company's Policy on Personal Data Processing and Security.

7. SUPPLEMENTARY TERMS AND CONDITIONS

7.1. The Company reserves the right to make changes to the Policy.

7.2. The new Policy will come into force on the date of its posting on the Website, unless otherwise provided in the new revision of the Policy.

7.3. The current Policy is posted on the Internet at: https://netzero.ru.

7.4. In case of any questions related to the processing of the Visitor's personal data or the exercise of the rights of the personal data subject, the Visitor may contact the Company by sending a request to the email address specified in Clause 8 of this Policy.

7.5. The processing of personal data collected using Cookies is carried out in accordance with:

Federal Law No 152-FZ dated July 27, 2006, 'On Personal Data';

Federal Law No 149-FZ dated July 27, 2006, 'On Information, Information Technology and Information Protection';

the Company's Policy on the processing and security of personal data posted on the Website;

this Cookies Policy.

7.6. For more detailed information on the personal data processing procedure, the rights of personal data subjects, and measures to protect personal data, see the Company's Policy on personal data processing and security.

8. COMPANY CONTACT INFORMATION

International Limited Liability Company EN+ HOLDING

Taxpayer Identification Number (INN) 3906395843

Primary State Registration Number (OGRN) 1203900013294

Registered address: 8 Oktyabrskaya st., office 31, Kaliningrad, Kaliningrad Region, 236006.

Tel.: +7 495 642 7937

Email: press-center@enplus.ru

Website: https://netzero.ru

APPENDIX

LIST OF COOKIES USED

Cookie Name	Provider	Type	Purpose	Storage Period
Yandex.Metrica Cookies (third-party, analytical)				
_ym_metrika_enabled	Yandex.Metrica	Analytical	Checks whether other Metrica cookies are installed correctly	60 minutes
_ym_isad	Yandex.Metrica	Analytical	Detects the presence of an ad blocker	2 days
_ym_uid	Yandex.Metrica	Analytical	Allows to distinguish visitors	1 year
_ym_d	Yandex.Metrica	Analytical	Stores the date of the first visit to the website	Max. 1 year. The actual period is determined by Yandex.Metrica in accordance with its documentation.
_ym_visorc_	Yandex.Metrica	Analytical	Ensures the operation of Webvisor	30 minutes
_ym_hostIndex	Yandex.Metrica	Analytical	Limits the number of requests	One day
yabs-sid	Yandex.Metrica	Technical	Visit ID	During a browser session
i	Yandex.Metrica	Technical	Allows to distinguish visitors	1 year
yandexuid	Yandex.Metrica	Analytical	Allows to distinguish visitors	1 year
yuidss	Yandex.Metrica	Analytical	Allows to distinguish visitors	Max. 1 year. The actual period is determined by Yandex.Metrica in

				accordance with its documentation.
ymex	Yandex.Metrica	Analytical	Stores auxiliary information for Metrica's operation	1 year
usst	Yandex.Metrica	Analytical	Synchronising IDs between Yandex domains	Max. 1 year. The actual period is determined by Yandex.Metrica in accordance with its documentation.
gdpr	Yandex.Metrica	Technical	Distinguishes visitors from the GDPR zone	Up to 2 years
is_gdpr	Yandex.Metrica	Technical	Distinguishes visitors from the GDPR zone	Up to 2 years
is_gdpr_b	Yandex.Metrica	Technical	Distinguishes visitors from the GDPR zone	Up to 2 years