

**RULES FOR
implementation and participation in promotional activity
“Open ticket”**

1. GENERAL TERMS

1.1. Promotional activity name in the form of advertising Action: **“Open ticket”** (hereinafter – Action).

1.2. Announcement of the action, as well as the information about the organizer, rules for implementation of the Action, number of prizes by result of the Action, terms, location and procedure for receiving them are posted on the website <https://pnr360.ru> (hereinafter – Website).

1.3. No fee is charged for participation in the Action. The Action is held without using any lottery facilities, is not lottery or any other game of chance.

1.4. Action organizer is a limited liability company “SP-Capital”, Taxpayer Identification Number 7703428522, Primary State Registration Number 1177746563576, registered to the address: office 1/89, 12, Presnenskaya Embankment, Moscow, 123112.

1.5. Organizer has the right to change or suspend the Action holding unilaterally at its own discretion, if the Action cannot be held for whatever reason as it has been planned, including any reason beyond the Organizer’s control, which distorts or affects implementation, security, honesty, integrity or proper Action holding. Information on changes in present Rules, the Action cancellation, or other significant developments related to the Action holding, are made through the Website.

1.6. Organizer does not reimburse or compensate for the losses, costs or other expenses which the Action Participant might have due to taking part in the Action.

2. TERMS AND DEFINITIONS

2.1. **Action** – advertising campaign, not a promotional activity under article 9 of the Federal Law of 13.03.2006 №38 – FL “On Advertising”, held by the Organizer in accordance with these Rules.

2.2. **Ticket** – a document in a standardized format, identifying the right to visit PANORAMA360 Observation deck by the Participant within PANORAMA360 Observation deck working time according to the schedule of sessions offered on the Website.

2.3. **Open ticket** – Ticket, identifying the right to visit PANORAMA360 Observation deck by the Participant without indication of the date and time of the visit, is valid within 90 days from the purchase date.

2.4. **Individual visit** – one-time purchase of one or several Tickets (to 10 Tickets) by one purchaser.

2.5. **Observation deck ticket office** – Observation deck ticket office, located at 2, Presnenskaya Embankment, Afimall City shopping & entertainment centre.

2.6. **Observation deck** – PANORAMA360 Observation deck, located at floor 89, 12, Presnenskaya Embankment, Moscow, Russia.

2.7. **Participant** – a person, who met present Rules requirements and fulfilled the conditions set by present Rules. The Action Participants can be competent adults only, acting in their own interest above the age of 18. Participants have rights and bear responsibilities, established by legislation of the Russian Federation, as well as present Rules. Each Participant is to act on his own behalf, in his own interest, and tackle all responsibilities. After Open ticket purchase by the Website user a person is recognized as Participant of this Action.

3. THE ACTION GENERAL TERMS

- 3.1. Timing for the Action: from 16.01.2021. Action end date is defined by the Organizer.
- 3.2. Within this Action the Participants are offered to buy an Open ticket for PANORAMA360 Observation deck individual visit.
- 3.3. Open ticket price is displayed on the appropriate page of the Website, also is available at the Observation deck Ticket office.
- 3.4. Open tickets are valid within 90 days from the purchase date.
- 3.5. Action prize fund is formed at the Organizer's own expense.
- 3.6. No return or exchange of the Open ticket purchased within this Action.
- 3.7. In case the Open ticket validity is expired, it is annulled. No refund (unutilized amount) is made.

4. RULES OF PARTICIPATION IN THE ACTION

- 4.1. By purchasing the Open ticket, Participant thereby:
 - confirms that is familiar and agrees with present Rules;
 - undertakes to respect present Rules;
 - confirms that is familiar and agrees with the Rules of conduct at PANORAMA360 Observation deck, PANORAMA360 Observation deck User agreement;
 - confirms that is a competent adult (or a person, lacking capacity to act fully, but under civil law has the right to commit such acts) and has attained the age of 18;
 - consents to processing of the personal data provided to the Organizer in order to participate in the Action and receive the prizes.
- 4.2. Persons, who don't meet the Rules or who have broken them, cannot take part in the Action and cannot be eligible to receive and (or) use the prizes of the Action. If such persons are identified at any stage of the Action, including contact with Participants in order to give the prizes, they lose their right to receive the prizes of the Action.
- 4.3. Rights of the Action Participants:
 - A. participate in the Action according to the Rules;
 - B. get information about terms and conditions of the Action;
 - C. not to participate in the Action.
- Responsibilities of the Action Participants:
 - A. abide by the Rules;
 - B. comply with using individual protective equipment for respiratory organs (masks, respirators) and hands (gloves), also social distance requirements (1,5 meters from another person) during the presence at PANORAMA360 Observation deck, established by the Moscow City Mayor's Decree of May 27, 2020 № 61-UM "About amendments to the Moscow City Mayor's Decree of March 5, 2020 № 12-UM, and other legal acts of public authority bodies, related to the measures applied in high-risk environments of the spread of new coronavirus infection (2019-nCoV).
 - C. take other responsibilities under the law of the Russian Federation and present Rules.
- 4.4. Visiting PANORAMA360 Observation deck by a Participant shall be in strict accordance with established Rules of conduct at the PANORAMA360 Observation deck.
- 4.5. For additional responses to the questions, related to participation in the Action, Participants have the right to apply to the Organizer via e-mail: welcome@pnr360.ru.

5. PERSONAL DATA

5.1. According to the Action Rules the Action Organizer handles personal data.

5.2. Taking part in the Action, a Participant, acting of his own free will and in his own interest, consents to processing of the personal data by the Organizer on the following conditions: personal data will be used only by the Organizer for the duration of the Action without any rewards to a Participant, and will not be provided to any third parties for the purposes unrelated to this Action.

5.3. Consent is given to undertake the following actions with personal data: collection, registration, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (spread, provision, access), sanitization, blocking, deletion, erasing personal data.

5.4. Organizer processes personal data in strict accordance with principles and rules set by the legislation, including confidentiality and personal data security while proceeding.

5.5. In case a Participant withdraws consent to process personal data by sending an e-mail to welcome@pnr360.ru, a Participant automatically stops participation in the Action, and the Organizer is not responsible for non-compliance of the obligations, prescribed by these Rules, if Participant's personal data erasing has happened as the result of withdrawal consent to process personal data by a Participant.

5.6. Participant consents to take part in promo interviews about participation in the Action, including radio and TV, and other mass media as well; also to making photo or video shooting with a Participant by the Organizer or/and third parties on the instructions of the Organizer, photos and video records with a Participant may be used in the mass media as well without any additional consent or reward, for commercial purposes in particular, with transferability of the rights to use mentioned above photos and video records with a Participant by the third parties.

5.7. Personal data list to process by the Organizer of the Action: last name, name, middle name, passport data, TIN, registration address.

CEO of LLC "SP-Capital", MC of the PANORAMA360

A.N. Shakaryan