## PERSONAL DATA PROCESSING POLICY

This Personal Data Processing Policy (hereinafter referred to as the "Policy") regulates the legal relations regarding the processing of personal data between "Central Asian University" LLC, TIN: 306210969, address: Republic of Uzbekistan, Tashkent city, Mirzo-Ulugbek district, Milliy Bog street, house 264 (hereinafter referred to as the "Company") and the user of the website (hereinafter referred to as the "User").

The following basic terms are used in this Personal Data Processing Policy:

- Subject of personal data (subject) a natural person to whom the personal data relate;
- "website" or "Company's Internet Resource" refers to the website, including all levels of domain names, owned by the Company.
- "Personal Data" refers to any information relating to a directly or indirectly identified or identifiable individual (citizen).
- "Processing of Personal Data" refers to the implementation of one or a set of actions related to the collection, systematization, storage, modification, addition, use, provision, dissemination, transfer, anonymization, and destruction of personal data.
- 1. This Policy defines the procedure for processing personal data of the website users (hereinafter referred to as the "Site"), the conditions and principles of personal data processing, the rights of Users, and the obligations of the Company, as well as information about the measures implemented to protect the processed personal data.
  - 2. This Policy applies to all personal data that the Company receives from Users.
- 3. The User agrees to this Policy by entering their name, phone number, and, if necessary, email address into a special field on the Site with an offer to send a consultation request, make an appointment, place an order, or perform other actions provided by the Site's functionality, and subsequently clicking the "Send," "Request Consultation," "Accept," or other buttons.

In case of disagreement with the terms of the Policy, the User must immediately cease any use of the Site.

- 4. When using the Site's functionality, the User may provide the Company with the following personal data (the list and types of personal data depend on the specific functional capabilities of the internet resource used by the User): last name, first name, email address, contact phone number, user identification data (user ID).
- 5. By providing their personal data, the User agrees to their processing (until the User withdraws their consent to the processing of personal data), including collection, storage, anonymization, transfer to third parties in cases provided for by the Policy, by the Company for the purpose of providing the User with advertising, reference information, services in accordance with the Site's functionality, and for other purposes according to clause 8 of this Policy. When processing personal data, the Company is guided by the Law of the Republic of Uzbekistan dated July 2, 2019, No. 3PV-547 "On Personal Data," taking into account the provisions of the General Data Protection Regulation (GDPR) of the European Union dated April 27, 2016, other legislative acts of the Republic of Uzbekistan, and local regulatory legal acts.

The User's consent to the processing of personal data is valid from the date of providing such consent until the moment the processing purposes are achieved or the User withdraws their consent, unless otherwise provided by applicable law.

The User may at any time withdraw the consent provided to the Company in the manner established by this Policy.

- 6. If the User wishes to clarify their personal data in case the personal data is incomplete, inaccurate, or outdated, or wishes to withdraw their consent to the processing of personal data, the User must send an official request to the Company with the subject "Clarify Personal Data" or "Stop Processing Personal Data" to the email address info@centralasian.uz. The email must indicate the User's email address and the corresponding request.
  - 7. The Company uses the data provided by the User for the following purposes:
- 7.1. Registration and identification of the User on the Site, providing the User with the opportunity to fully use the Site;
- 7.2. Further communication regarding the User's request, including by third parties—partners of the Company for the fulfillment of obligations under the User's request, consulting on the provision of the Company's services;
  - 7.3. Creating an account and providing access to the User's account on partner sites;
  - 7.4. Sending informational messages;
- 7.5. Advertising, promotion of goods, works (services), including based on the information received about the User's personal preferences and settings;
  - 7.6. Evaluation and analysis of the Site's performance;
- 7.7. Analytics of advertising effectiveness, statistical research based on anonymized information provided by the User;
- 7.8. Informing the User about promotions, discounts, and special offers through email and phone communications;
- 7.9. Conducting marketing research, including with the involvement of third parties as contractors (executors, consultants);
- 7.10. Communication with partner banks regarding the provision of loans to the User and/or coordination of loan terms.
- 8. The Company does not verify the data provided or specified by the User. In this regard, the Company assumes that when providing personal data, the User:
- 8.1. Is a capable individual. In case of incapacity of the person using the Site, consent to the processing of personal data is provided by the legal representative.
- 8.2. Provides accurate information about themselves (or about the incapacitated person they represent). The User independently maintains the provided personal data in an up-to-date state.
  - 8.3. Independently maintains the provided personal data in an up-to-date state.
  - 9. The Company processes personal data based on the following principles:
  - 9.1. Legality;
- 9.2. Limitation of personal data processing to the achievement of specific, predetermined lawful purposes;
- 9.3. Prevention of personal data processing that is incompatible with the purposes of collecting and/or storing the data received from the User;
- 9.4. Compliance of the content and volume of processed personal data with the purposes of their processing;
  - 9.5. Prevention of processing data that is excessive in relation to the purposes of processing;

- 9.6. Ensuring the accuracy, sufficiency, and relevance of personal data in relation to the purposes of their processing;
- 9.7. Destruction or anonymization of personal data to prevent their disclosure upon achieving the purposes of data processing, loss of the need for such processing, or upon receiving a request from the User to destroy personal data or a statement of withdrawal of consent to the processing of personal data.
- 10. The Company, when processing personal data, takes necessary and sufficient organizational and technical measures to protect personal data from unauthorized access, as well as from other unlawful actions regarding personal data.

The processing of Users' personal data is carried out by the Company taking into account the following:

- 10.1. The processing of Users' personal data is carried out using databases located in the territory of the Republic of Uzbekistan.
- 10.2. The processing of personal data is carried out both with the use of automated means and without their use.
- 10.3. The Company undertakes not to transfer the information received from the User to third parties, except in cases specifically stipulated in this Policy.
- 10.4. The transfer of Users' personal data to third parties—partners of the Company, if necessary, is carried out based on the Users' consent for the purpose of fulfilling obligations to the Users.

The Company, and in case of transfer of Users' personal data to third parties—partners of the Company, these parties undertake to keep confidential, not disclose, and not distribute personal data without the User's consent, unless otherwise provided by applicable law and/or this Policy.

- 10.5. The storage of Users' personal data is carried out on electronic media, and for the purpose of fulfilling obligations to the Users, it may be carried out on physical media after the extraction of personal data.
- 10.6. The storage of personal data is carried out within the period objectively necessary for the fulfillment of obligations to the Users and is determined by the following events (depending on which event occurs earlier):
  - 10.6.1. Until the moment the User deletes personal data through the personal account;
- 10.6.2. Until the moment the Company destroys personal data due to the receipt of a request from the User to destroy personal data or withdraw consent to their processing;
  - 10.6.3. Until the moment the User's consent expires.
- 10.7. The Company has the right to store the User's personal data, except in cases of receiving a request to destroy the data or withdraw consent to the processing of data, in an anonymized form after fulfilling obligations to the User.
- 10.8. By accepting the terms of this policy, the user hereby provides their explicit consent to the processing of their personal data for the purpose of delivering services, for a duration of five (5) years from the date of such acceptance.
- 11. If it is necessary to transfer Users' personal data to third parties—partners of the Company in cases expressly provided for by the Policy, such transfer is carried out under the following conditions:

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11.1. The third party—partner of the Company ensures the confidentiality of personal data during their processing and use and undertakes not to disclose the data to other persons, as well as not to distribute the Users' personal data without their consent;

- 11.2. The third party—partner of the Company guarantees compliance with the following measures to ensure the security of personal data during their processing: use of information protection means; detection and recording of unauthorized access to personal data and taking measures to restore personal data; restriction of access to personal data; monitoring and evaluation of the effectiveness of the applied measures to ensure the security of personal data, other measures provided by law;
- 11.3. The third party—partner of the Company is prohibited from transferring and distributing Users' personal data.
- 12. It is not considered a violation of the obligations provided for by this Policy to transfer information in accordance with justified and applicable requirements of the legislation of the Republic of Uzbekistan, as well as the provision of information by the Company to partners acting on the basis of an agreement (contract) with the Company for the fulfillment of obligations to the User; transfer by the Company to third parties of data about the User in an anonymized form for the purpose of evaluating and analyzing the Company's Site performance, providing personal recommendations, displaying advertisements based on the User's personal preferences and settings, as well as conducting marketing, analytical, and/or statistical research.
- 13. The Company has the right to use the "cookies" technology. Cookies are data that is automatically transmitted to the Company during the use of the Site using the software installed on the User's device, including the IP address, geographical location, information about the browser and type of operating system of the User's device, technical characteristics of the equipment and software used by the User, date and time of access to the Site.

Cookies do not contain confidential information. Cookies are used to remember the User's preferences and settings, as well as to collect analytical data about visits to the Site. The use of the Site means that the User agrees to the use of all cookies and analytical data about visits to the Site, as well as to their transfer to third parties.

- 14. The Company receives information about the User's IP address and information about which website link they came from. This information is not used to identify the visitor.
- 15. The User has the right to receive information from the Company regarding the processing of their personal data. The Company provides the User or their representative with the opportunity to familiarize themselves with the personal data related to the User free of charge.

In case of incompleteness, inaccuracy, or outdatedness of the information, the Company, based on the User's information, makes the necessary changes to the User's personal data within a period not exceeding 7 (seven) working days and notifies the User of the changes made.

If the User or their representative provides the Company with confirmation of the fact of unlawful receipt or processing of their personal data, as well as the fact of non-compliance of actions with their personal data with the purposes of processing, the Company undertakes to destroy such personal data of the User within a period not exceeding 7 (seven) working days and notify the User of the measures taken.

- 16. The Company undertakes to stop processing the User's personal data or ensure the termination of processing by a third party—partner of the Company in the following cases:
  - 16.1. Identification of unlawful processing of the User's personal data;
  - 16.2. Withdrawal of the User's consent to the processing of their personal data;
  - 16.3. Receipt of a request from the User to destroy personal data;
  - 16.4. Achievement of the purpose of processing personal data.
- 17. The Company independently determines the list of third parties—partners of the Company and informs the Users about it by any available means, including by posting it on the Site.

- 18. The Company has the right to make changes to this Policy at any time. The current text of the Policy is posted on the Site.
- 19. Continued use of the Site or its services after the publication of a new version of the Policy means the User's acceptance of the Policy and its terms.

In case of disagreement with the terms of the Policy, the User must immediately stop using the Site and its services.

20. All questions regarding this Policy and/or the processing of personal data should be sent to the Company's email address: <a href="mailto:info@centralasian.uz">info@centralasian.uz</a>

## **Company Information:**

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