## Personal Data Processing Policy at Tanaq Co., Limited

#### 1. General provisions

- 1.1. This Policy of the Tanaq Co., Limited regarding the processing of personal data (hereinafter referred to as the Policy) has been developed in compliance with the requirements of the Law in relation to automated processing of personal data in order to ensure the protection of human and civil rights and freedoms when processing his personal data, including the protection of the rights to privacy, personal and family secrets.
  - 1.2. The Policy applies to all personal data processed by Tanaq Co., Limited (hereinafter referred to as the Company).
- 1.3. The Policy applies to relations in the field of personal data processing that arose with the Company both before and after the approval of this Policy.
- 1.4. In compliance with the requirements of Law this Policy is published in free access on the Internet information and telecommunications network on the Company's website (https://azpo.e-place.com/).
- 1.5. By using the Company's Services and website, the User agrees to the processing of personal data. If the User does not want the Company to process his personal data, the User does not use the site or does not provide personal data in any other way.
  - 1.6. The personal data of Users is processed by the Company solely on the basis of the consent of the User himself.

### 2. Basic concepts used in Politics:

- 2.1. personal data any information related directly or indirectly to a specific or identifiable individual (subject of personal data). Personal data is considered to be a set of data that allows you to uniquely identify an individual;
- 2.2. personal data operator (operator) a state body, municipal body, legal entity or individual, independently or jointly with other persons organizing and (or) processing personal data, as well as determining the purposes of processing personal data, the composition of personal data to be processed, actions (operations) performed with personal data;
- 2.3. processing of personal data any action (operation) or a set of actions (operations) with personal data performed using automation tools or without their use. The processing of personal data includes, inter alia:
  - 2.3.1. collection;
  - 2.3.2. recording;
  - 2.3.3. systematization;
  - 2.3.4. accumulation;
  - 2.3.5. storage;
  - 2.3.6. clarification (update, change);
  - 2.3.7. extraction;
  - 2.3.8. usage;
  - 2.3.9. transfer (distribution, provision, access);
  - 2.3.10. depersonalization;
  - 2.3.11. blocking;
  - 2.3.12. deletion;
  - 2.3.13. destruction
  - 2.3.14. automated processing of personal data processing of personal data using computer technology;
  - 2.3.15. dissemination of personal data actions aimed at disclosing personal data to an indefinite circle of persons;
  - 2.3.16. provision of personal data actions aimed at disclosing personal data to a certain person or a certain circle of persons;
- 2.3.17. blocking of personal data temporary termination of the processing of personal data (except in cases where processing is necessary to clarify personal data);
- 2.3.18. destruction of personal data actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and (or) as a result of which the material carriers of personal data are destroyed;
- 2.3.19. depersonalization of personal data actions as a result of which it becomes impossible to determine the identity of personal data to a specific personal data subject without using additional information;
- 2.3.20. personal data information system a set of personal data contained in databases and information technologies and technical means that ensure their processing;

cross-border transfer of personal data is the transfer of personal data to the territory of a foreign state to an authority of a foreign state, a foreign individual or a foreign legal entity.

## 3. Basic rights and obligations of the operator:

- 3.1. The Operator has the right to:
- 3.1.1. independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations provided for by Law;
- 3.1.2. entrust the processing of personal data to another person with the consent of the personal data subject, on the basis of a contract concluded with this person. The person processing personal data on behalf of the operator is obliged to comply with the principles and rules of personal data processing provided for by the Law;
- 3.13. if the personal data subject withdraws consent to the processing of personal data, the operator has the right to continue processing personal data without the consent of the personal data subject if there are grounds specified in Law.
  - 3.2. The Operator is obliged to:
  - 32.1. organize the processing of personal data in accordance with the requirements of the Law;
  - 322. respond to requests and requests from personal data subjects and their legal representatives;
  - 3.3. The basic rights of the personal data subject. The subject of personal data has the right to:
- 33.1. to receive information concerning the processing of his personal data. The information is provided to the personal data subject by the operator in an accessible form, and it should not contain personal data related to other personal data subjects;
- 332 to require the operator to clarify his personal data, block or destroy them if the personal data is incomplete, outdated, inaccurate, illegally obtained or are not necessary for the stated purpose of processing, as well as to take measures provided for by law

to protect their rights;

- 333. to put forward the condition of prior consent when processing personal data in order to promote goods, works and services on the market;
- 334. Control over the fulfillment of the requirements of this Policy is carried out by an authorized person responsible for organizing the processing of personal data from the operator.
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# 4. Purposes of personal data collection

- 4.1. the Company processes personal data in order to provide the User with a full range of the Company's services on the website, ensuring the protection of human and civil rights and freedoms when processing his personal data, including the protection of privacy rights.
  - 4.2. promotion of the Company's services on the market.
- 4.3. The processing of personal data is limited to the achievement of specific, predetermined and legitimate goals. Processing of personal data incompatible with the purposes of personal data collection is not allowed.
  - 4.4. only personal data that meet the purposes of their processing are subject to processing.
  - 4.5. the processing of personal data by the operator is carried out for the following purposes:
  - 4.5.1. carrying out its activities in accordance with the Company's Charter;
  - 4.52. filling in and submitting required reporting forms to executive authorities and other authorized organizations;
  - 4.5.3. accounting.
- 4.6. the processing of personal data of Users (subjects of personal data) may be carried out solely for the purpose of ensuring compliance with laws and other regulatory legal acts.

## 5. Legal grounds for processing personal data

- 5.1. The government law;
- 5.2. The Articles of Association of the Company;
- 5.3. Contracts concluded between the operator and the subjects of personal data (including the expression of Acceptance of the Offer located on the website: https://azpo.e-place.com/);
  - 5.4. Consent of personal data subjects to the processing and transfer of their personal data.

## 6. The volume and categories of personal data processed, categories of personal data subjects

- 6.1. The content and volume of the processed personal data must comply with the stated processing purposes provided for in paragraph 2 of this Policy. The processed personal data should not be redundant in relation to the stated purposes of their processing.
- 6.2. The Operator may process the personal data of Users, as well as persons whose information was transferred to the Company as a result of fulfilling obligations under the Offer on the terms of service of the Electronic Internet Platform on the site https://azpo.e-place.com/, namely the following information:
  - 621. last name, first name, patronymic;
  - 622 citizenship;
  - 623. contact information (phone number, e-mail address);
  - 624. bank details;
  - 625. other personal data provided by the user for the fulfillment of obligations.
  - 6.3. The Company additionally processes the following categories of personal data:
  - 6.3.1. information about the type of browser that the User uses to log in to the site;
  - 6.3.2. details of the web pages that the User is viewing;
  - 6.3.3. The IP address and location address of the device from which the login is made;
- 6.3.5. information collected using cookies or similar device tracking technologies, as well as any information that the User has decided to provide when using third-party sites, for example, when visiting pages on social networks, in particular (Facebook, Instagram,, Twitter, etc.). The Company does not transfer personal data to the owner of the corresponding social network when the User open such a link.
  - 6.3.6. passwords;
  - 6.3.7. payment history, payment information (for example, bank information or credit card details);
  - 6.3.8. the history of Applications posted on the Company's website.
- 6.4. The Operator does not process special categories of personal data related to race, nationality, political views, religious or philosophical beliefs, or health status.

## 7. The procedure and conditions for processing personal data

- 7.1. the processing of personal data is carried out by the operator in accordance with Law.
- 7.2. the processing of personal data is carried out with the consent of the subjects of personal data to the processing of their personal data.
  - 7.3. the Operator performs both automated and non-automated processing of personal data.
  - 7.4. the operator's employees, whose job responsibilities include processing personal data, are allowed to process personal data.
  - 7.5. the processing of personal data is carried out by:
- 75.1. receipt of personal data in writing directly from the subjects of personal data (filling in the appropriate cells/fields on the Company's website);
  - 752 obtaining personal data from publicly available sources;
  - 753. entering personal data into the registers and information systems of the Company;
  - 754. using other methods of processing personal data.
- 7.6. disclosure to third parties and dissemination of personal data without the consent of the personal data subject, unless otherwise provided by Law.
- 7.7. the Operator takes the necessary legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, distribution and other unauthorized actions, including:
  - 7.7.1. identifies threats to the security of personal data during their processing;
  - 7.7.2. adopts local regulations and other documents regulating relations in the field of personal data processing and protection;

- 7.7.3. appoints persons responsible for ensuring the security of personal data in the structural divisions and information systems of the operator;
  - 7.7.4. creates the necessary conditions for working with personal data;
  - 7.7.5. organizes the accounting of documents containing personal data;
  - 7.7.6. organizes work with information systems in which personal data is processed;
  - 7.7.7. stores personal data in conditions that ensure their safety and exclude unauthorized access to them;
  - 7.7.8. organizes training for employees of the operator (Company) who process personal data.
- 7.8. The Operator stores personal data in a form that allows to identify the subject of personal data, no longer than the purposes of personal data processing require.

When collecting personal data, including through the Internet information and telecommunications network, the Operator ensures the recording, systematization, accumulation, storage, clarification (updating, modification), extraction of personal data.

# 8. Updating, correction, deletion and destruction of personal data, responses to requests from subjects for access to personal data

- 8.1. Confirmation of the fact of personal data processing by the operator, the legal grounds and purposes of personal data processing, as well as other information, are provided by the operator to the personal data subject or his representative when contacting or receiving a request from the personal data subject or his representative.
- 8.2. The information provided does not include personal data related to other personal data subjects, except in cases where there are legitimate grounds for disclosure of such personal data.
  - 8.3. The request must contain:
- 83.1. the number of the main identity document of the personal data subject or his representative, information on the date of issue of the specified document and the issuing authority;
- 832 information confirming the personal data subject's participation in relations with the operator (contract/application number, date of conclusion of the contract or Acceptance of the Offer, conditional verbal designation and (or) other information), or information otherwise confirming the fact of processing personal data by the operator;
  - 833. Signature of the personal data subject or his representative.
  - 8.4. The request can be sent in the form of an electronic document and signed with an electronic signature.
- 8.5. If the personal data subject's request does not reflect all the necessary information in accordance with the requirements of the Law, or the subject does not have access rights to the requested information, then a reasoned refusal is sent to him.
- 8.6. In case of identification of inaccurate personal data when contacting a personal data subject or his representative, the Operator blocks personal data related to this personal data subject from the moment of such request or receipt of the specified request for the verification period, if the blocking of personal data does not violate the rights and legitimate interests of the personal data subject or third parties.
- 8.7. In case of confirmation of the inaccuracy of personal data, the operator, based on the information provided by the personal data subject or his representative, or other necessary documents, clarifies the personal data within 10 (Ten) working days from the date of submission of such information and removes the blocking of personal data.
- 8.8. In case of detection of unlawful processing of personal data when contacting (requesting) a personal data subject or his representative, the Operator blocks illegally processed personal data related to this personal data subject from the moment of such request or receipt of the request.
- 8.9. Upon achievement of the purposes of personal data processing, as well as in the case of withdrawal by the subject of personal data of consent to their processing, personal data shall be destroyed if:
- 8.10.1. nothing else is provided for in the contract or the Offer, the party to which, the beneficiary or the guarantor, according to which the subject of personal data is;
- 8.10.2. The Operator does not have the right to process personal data without the consent of the subject on the grounds provided for by Law;
  - 8.10.3. nothing else is provided for by another agreement between the operator and the subject of personal data.

The Company may amend this Policy by posting an updated version on the website. With regard to data processing processes carried out on the basis of the User's consent, the Company does not have the right to change the scope of such processing of Personal Data, except in cases where the User provides additional consent to change the volume of information processing.