

# Privacy Policy

*Version 1.0.*

*Date: 26 January 2024*

## 1. General

- 1.1. The Privacy Policy (hereinafter referred to as the Policy) has been developed in accordance with the requirements of Part 2 of Article 4 of the Law of the Kyrgyz Republic "On Personal Information" and defines the legal and organisational basis for the processing of personal data by Advanced Mobile Solutions LLC (hereinafter referred to as the Processor).
- 1.2. The Policy is aimed at ensuring the protection of the rights and freedoms of the subject of personal data when processing their personal data and applies to all operations with personal data performed by the Processor, both in an automated mode and without it.

## 2. Basic rights and obligations of personal data subjects

- 2.1. Personal data subjects have the right to:
  - to full information about their personal data processed by the Processor;
  - access their personal data, including the right to receive a copy of any record containing their personal data, except in cases provided for by the Law of the Kyrgyz Republic "On Personal Information";
  - to clarify their personal data, block or destroy it in cases where the personal data is incomplete, outdated, inaccurate, illegally obtained or not necessary for the stated purpose of processing;
  - to take measures provided for by law to protect their rights, including appealing to the authorised state body for personal data;
  - to exercise other rights provided for by the legislation of the Kyrgyz Republic.
- 2.2. Personal data subjects are obliged to:
  - provide the Processor with only accurate data about themselves;
  - provide documents containing personal data to the extent necessary for the purpose of processing;
  - inform the Processor about any clarification (update, change) of their personal data.

## 3. Basic rights and obligations of the Processor

- 3.1. The Processor has the right to:
  - receive accurate information and/or documents containing personal data from the data subject;
  - clarify the personal data provided by the subject.

- 3.2. The Processor is obliged to:
- process personal data in accordance with the procedure established by the Law of the Kyrgyz Republic "On Personal Information";
  - consider requests from the subject of personal data regarding the processing of personal data and provide responses within a period not exceeding 7 days from the date of submission of the request;
  - provide the subject of personal data with free access to their personal data;
  - take measures to update personal data in connection with the request of the personal data subject;
  - organise the protection of personal data in accordance with the requirements of the legislation of the Kyrgyz Republic.
- 3.3. The processor collects, uses and protects personal data provided by the subject of personal data when communicating in any form in accordance with the Policy and the legislation of the Kyrgyz Republic.
4. **The scope and categories of personal data processed, categories of personal data subjects**
- 4.1. The Processor processes the personal data of users of the website <https://betterhub.ai>.
- 4.2. The personal data processed by the Processor includes:
- Full name;
  - email address.
- 4.3. Purposes of personal data collection: establishing feedback, including sending notifications, requests and information related to the provision of services by the Processor, as well as processing requests and applications.
- 4.4. The Processor ensures that the content and scope of of the personal data processed with the stated purposes of processing and, if necessary, takes measures to eliminate their excessiveness in relation to the stated purposes of processing.
- 4.5. The Processor does not process special categories of personal data revealing racial or ethnic origin, nationality, political opinions, religious or philosophical beliefs, or relating to health or sex life.
- 4.6. Lists of personal data and categories of personal data subjects may be revised by the Processor with mandatory changes to the Policy and notification of personal data subjects by any available means (official website, announcement, push notification, email, etc.).
- 4.7. Personal data is processed by the Processor for the following predefined and legitimate purposes: conclusion, execution and termination of civil law contracts.
5. **Legal grounds for the processing of personal data**

- 5.1. The legal basis for the processing of personal data by the Processor is the Law of the Kyrgyz Republic "On Personal Information".

## **6. Procedure and conditions for processing personal data**

- 6.1. The processing of personal data by the Processor is carried out by automated means.
- 6.2. The processing of personal data includes any operations or a set of operations performed independently of the means, by automatic means or without them, for the purposes of collecting, recording, storing, updating, grouping, blocking, erasing and destroying personal data.
- 6.3. The processing of personal data is carried out by the Processor subject to the consent of the personal data subject (hereinafter referred to as Consent), except in cases established by law where the processing of personal data may be carried out without such Consent.
- 6.4. Methods of notifying the subject of personal data: email.
- 6.5. The personal data subject decides on the provision of his or her personal data and gives his or her consent in writing on paper or in the form of an electronic document signed in accordance with the legislation of the Kyrgyz Republic with an electronic signature.
- 6.6. The conditions for terminating the processing of personal data may be the achievement of the purposes of personal data processing, the updating of personal data, and the detection of unlawful processing of personal data.
- 6.7. In order to achieve the purposes of processing, the processor shall have the right, with the consent of the personal data subject, to transfer personal data to third parties, provided that the recipient of the data is obliged the obligation to maintain the confidentiality of such data.
- 6.8. When processing personal data, the processor shall take or ensure that the necessary legal, organisational and technical measures are taken to protect personal data from unlawful or accidental access, destruction, alteration, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions in relation to personal data.
- 6.9. Personal data shall not be stored longer than is necessary to fulfil the purposes for which it was collected. Storage periods may be extended only in the interests of the data subject or if provided for by the legislation of the Kyrgyz Republic.

## **7. Updating, correcting, deleting and destroying personal data, responding to requests from personal data subjects for access to personal data**

- 7.1. If the inaccuracy of personal data or the unlawfulness of its processing is confirmed, personal data shall be

updated, blocked or destroyed, depending on the legality of the collection, storage and processing of such personal data by the Processor, or their processing must be terminated accordingly.

- 7.2. In the event of inaccuracy of personal data or unlawfulness of its processing, the personal data subject has the right to contact the Processor directly.
- 7.3. Upon written request of the subject of personal data, the Processor is obliged to provide information about the processing of personal data carried out by it, reflecting the following information:
  - confirmation of the fact of processing of personal data by the Processor;
  - the legal grounds and purposes of the processing of personal data;
  - the purposes and methods of personal data processing used by the Processor;
  - the name and location of the Processor, information about persons (except for employees of the Processor who have access to personal data or to whom personal data may be transferred on the basis of a contract with the Processor of the personal data array or on the basis of the law;
  - the personal data being processed relating to the relevant data subject, the source of its origin;
  - the terms of processing of personal data, including the terms of its storage;
  - the procedure for the data subject to exercise their rights regarding the updating, blocking and destruction of personal data;
  - information about the actual or intended cross-border transfer of data.
- 7.4. If the subject does not have the right to access the requested information, a reasoned refusal is sent to them.
- 7.5. Upon expiry of the storage period and achievement of the purposes of personal data collection, the data shall be destroyed within two weeks. The destruction shall be confirmed by an act, a copy of which may be handed over to the personal data subject upon his or her written request.

## **8. Final provisions**

- 8.1. All relations concerning the processing of personal data not covered by the Policy are governed by the provisions of the Law of the Kyrgyz Republic "On Personal Information".
- 8.2. The processor has the right to make changes to the Policy. When changes are made to the current version, the date of the last update is indicated. The new version of the Policy comes into force from the moment it is made freely available for review, subject to the mandatory prior announcement of planned at least 5 working days prior to the date of publication of the new version of the Policy.