

Approved  
by the Order of LLC "Umai Group"  
№\_\_\_\_\_ from “\_\_” \_\_\_\_\_ 2023

## **Privacy policy**

for websites (including mobile applications) of LLC "Umai Group" (hereinafter referred to as the Holder), shops/supermarkets: "Dostor". "Narodny". GLOBUS, SPAR

**Umai Group!**



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## General Provisions

This document "Privacy Policy (after referred to as the "Policy") contains the methods of collection and rules for the use of User information by the Holder (hereinafter also referred to as "You"). By downloading, installing and using Mobile Applications, the Holder's websites (hereinafter referred to as Applications), you agree to the terms of this Policy in full. This Policy is an integral part of the documents referring to it, including User Agreements and License Agreements posted in the Mobile Application. Unless otherwise expressly provided by this Policy, the term and definitions used in it have the meaning set forth in the User Agreement and the License Agreement for Mobile application.

The legislation of the Kyrgyz Republic is subject to application to this Policy, including the interpretation of its provisions and the procedure for adoption, execution, modification and termination.

### Personal information

Personal information (personal information/personal data) in this Policy is understood as recorded information on a tangible medium can be identified with a specific User/person, allowing to identify this User/person directly or indirectly by reference to one or more several factors specific to its biological, economic, cultural, civil or social identity. Personal data includes biographical and identification data, personal characteristics, information about marital status, health status, subscriber phone number, geolocation data, information about purchases made by the User, offers received, accumulated points within the framework of relations with organizations participating in the loyalty program based on the Application (here referred to as "Partners"), and others activities using the Application, as well as the name, address, email address and other information provided by the user when contacting the support service or by phone.

The Holder processes the Personal Information that the User provides about himself independently by filling out the appropriate forms on the Website or in the Application, including by filling in the data about the User's profile by subscribing to the newsletter, contacting the Holder for technical support or through the feedback form, participating in promotions, etc.

The Holder may set requirements for the composition of information that must be provided for the User to perform certain actions. If certain information is not marked by the Holder as mandatory, its provision or disclosure is carried out by the User on at your discretion. For authorization in the Application, the Holder creates a unique identifier for each User, which is linked to the User's subscriber phone number. The Holder collects data on User interactions with Partners using server log files. Such information may be associated with a token. With the User's permission, the Holder also collects accurate geolocation data. The user

If the information provided by you contains personal data, you freely, by your own will and in your own interest, using the sites, Mobile Application, consent to any methods of their processing, including any action or a set of actions performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification) extraction, use, depersonalized transfer to third parties or Partners.

### Scope and categories of personal data processed, categories of personal data subjects

The holder processes the personal data of the following personal data subjects:

-User

The personal data processed by the Holder includes:

-Full name:

-birthday

-address,

-passport data (series, passport number, by whom and when issued);

-profession

-education,

-occupation;

-marital status

-cookies files :

-geolocation

-email, phone number,

-children's birthdays;

-pets.

The lists of personal data and categories of personal data subjects may be reviewed

by the Holder with mandatory fixing of changes in this Policy and notification of

personal data subjects in any available way (official website, announcement, push notification, sending an email)

### **Purposes of personal data collection**

Personal data is processed by the Holder in the following predetermined and legitimate purposes:

- to provide the highest quality services, increase the level of service and marketing activity, including for the purposes specified in the section "Use of Personal Information

The Holder uses Personal Information for the following purposes:

- Providing the opportunity to use the Application and/or Sites for their functional purpose;
- Conclusion and execution of contracts (agreements) with the User,
- Identification of the User as part of the fulfillment of obligations under contracts concluded with him,
- Providing communication with the User for the purpose of information service and improving the quality of the Application, including by notification with the involvement of third parties, Distribution among Users, as a target audience, of advertising materials of the Holder and/ or third parties

The Holder may provide Personal Information to Partners and other third parties providing services to the Holder, in cases where it is necessary to provide services within, the above-mentioned goals.

Other cases of transfer of Personal Information.

- The Holder may transfer depersonalized Personal Information to Partners and other third parties in in the following cases
- The User has expressed his consent to such actions, including cases when the User uses the settings of the Application, browser and other software used, eliminating the restriction on the provision of certain information:
- The transfer is necessary as part of the User's use of the functionality of the Application or Website,
- In connection with the transfer of all or part of the assets to the Holder in possession, use or ownership of a third party, including the assignment of rights under contracts concluded with the User in favor of such third person At the request of a court or other authorized state body within the framework of the procedure established by applicable law, Protection of the rights and legitimate interests of the Holder in connection with the violation of agreements concluded with the User contracts.

### **Policy for children**

The Holder does not intentionally collect Personal Information from children under the age of 12, does not request it and does not allow them to use Websites or Applications. Persons under the age of 12 are prohibited from providing personal information, in particular, your name, address, phone number and email address. If the Holder becomes aware that information has been collected from a child under the age of 12, the Holder will immediately delete such information. If you think that we may have received any information from a child or about a child under the age of 12, please contact us using the contacts listed in the CONTACTS tab.

### **Depersonalized information**

When you use the Application and/or Websites, the Holder may automatically collect depersonalized state, but not matted to a unique device identifier (permanent or non-permanent), name, model and other information about the device used, IP address, network information communication, location (country, region city), browser information, the source of arrival to the site, the source of the Application download, information about the operating system, information about the time and frequency of visits, statistics of actions on the Site, Application usage statistic, information about the transmitted and Information and materials obtained using the Application, as well as geolocation data, if the corresponding function is enabled in the User's device. The specified information is impersonal (anonymous), there is no data in it linking the information to a specific By the user Depersonalized information is processed separately from Personal Information and cannot be combined with Personal Information. Depersonalized information may be collected and/or processed using third-party software, such

- as:
- systems for collecting statistics (for example, Google Analytics),
  - plugins (blocks) of social networks (for example, Facebook, etc.);
  - banner display systems ;

- after systems for collecting and processing depersonalized information use of depersonalized information

The Holder uses depersonalized information for the following purposes

Improving the quality of the Application and/or

Websites: Providing communication with the User within the framework of information services, including by notification and with the involvement of third parties.

- Distribution of advertising materials of the Holder and/or third parties to

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- Тигетинг зангламные/или мийитмасименных материалов по возрасте поли, тигим почивкам

### **Third Parties**

Social Networks.

The Site has elements (plugins, widgets, hereinafter Elements) of social networks (for example, the Facebook "Like" button, the "Share" button, and the like). The company that provided such elements may collect information about your IP address, as well as information about the sites you visited the pages of our Websites.

Advertisement.

Advertisers of ads displayed in the Application and/or on the Sites may collect and use anonymized information, in particular, information about your activity in the Application and/or on the Sites, information about the device identifier, MAC address, geolocation information and IP address. They may use this information for the purpose of presenting advertisements that you they may be interesting. In addition, if the User clicked on the advertising link and installed the application, the advertiser may be notified of the device ID in order to confirm the effectiveness of the advertisement analytics. The Application and/or websites may use technologies for collecting and processing depersonalized information provided by third-party business service providers (for example, such as Google Analytics, Tapjoy and Appsflyer). These third-party providers may have access to the following data: your device ID, MAC address, IMEI, region (the specific region where the specified language is spoken), geolocation information and IP address, which will allow them to provide their services in accordance with their privacy policies.

Links The Application and/or Sites may contain links to third-party sites. If the User follows these links, he will leave the Site/Application, and the Holder is not responsible for the content and security of User data when using third party sites. These sites may have their own privacy policies governing the collection and storage of user data. This Policy does not apply to data provided, stored by, or used by third-party sites. The user is recommended to review the privacy policy of such a third party related to the storage of his data when logging into the site of a third person.

### **Changing the Privacy Policy**

This Policy may be changed or terminated by the Holder unilaterally without prior notice to the user is commended to regularly review this policy in the current version. The new version of the Policy comes into force from the moment it is posted, unless otherwise provided by the new editorial Policy.

Any questions regarding this Policy can be directed to the contacts listed in the CONTACTS tab.

All relations concerning the processing of personal data that are not reflected in this Policy are regulated in accordance with the provisions of the Law of the Kyrgyz Republic on Personal Information.