

APPROVED

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BY: CEO Marklen Konurbaev

GLOSEMA.GROUP
PERSONAL DATA PROCESSING POLICY

1. GENERAL TERMS

Personal Data Processing Policy (hereinafter referred to as the Policy) has been developed in accordance with the Law of the Kyrgyz Republic of April 14, 2008, No. 58 'On Personal Information' (hereinafter referred to as the 'Personal Information Law').

Current Policy describes measures and procedures for ensuring GLOSEMA.GROUP (hereinafter referred to as the 'Website') personal data users security in order to protect the rights and freedoms of individuals and citizens in their personal data processing, including privacy protection, personal and family secrets.

The following basic concepts are used in the Policy:

Automated personal data processing is regarded as personal data processing by means of computer technology;

Personal data blocking is regarded as a temporary termination of personal data processing (unless the processing is necessary for clarifying personal data);

Personal data information system is regarded as a combination of personal data contained in databases and the information technology and technical means ensuring personal data processing;

Personal data anonymisation is regarded as the action that makes it impossible to determine, without the use of additional information, whether the personal data belongs to a specific personal data subject;

Personal data processing is regarded as any action (operation) or a set of actions (operations) performed with personal data with or without the use of automated means, including collection, recording, systematisation, accumulation, storage, clarification (updating, and modification), extraction, use, transfer (distribution, provision, and access), anonymisation, blocking, removal, and destruction of personal data;

Operator Glosema LLC (Registration Number: 205374-3300, TIN 01904202210546, legal address: 125/1 Toktogul Street, Bishkek, Kyrgyz Republic), which processes personal data and determines personal data purposes, personal data composition to be processed, and actions (operations) performed with personal data;

Personal data is regarded as any information relating directly or indirectly to an identified or identifiable natural person (personal data subject);

Personal data provision is regarded as actions aimed at disclosing personal data to a certain person or a certain group of persons;

Personal data dissemination is regarded as actions aimed at disclosure of personal data to an indefinite group of persons (personal data transfer) or familiarisation of personal data to an unlimited range of persons, including publication of personal data in mass media, publication in information and telecommunication networks, or providing access to personal data in any other way;

Personal data destruction is regarded as actions that make it impossible to restore the content of personal data in personal data information system and/or actions that destroy the tangible media of personal data;

The Operator is obliged to publish or otherwise provide unrestricted access to this Personal Data Processing Policy.

2. TERMS AND CONDITIONS FOR PERSONAL DATA PROCESSING

2.1. Personal data processing terms

The Operator shall process personal data on the basis of the following terms:

- to respect lawfulness and fairness;

- to limit personal data processing to the achievement of specific, predetermined, and legitimate objectives;
- to avoid personal data processing that is incompatible with the purpose of personal data collection;
- to avoid combining databases containing personal data whose processing is incompatible with one another;
- to process only those personal data that meets the purposes for which it is processed;
- to correspond to the content and scope of the processed personal data with the stated processing purposes;
- to avoid personal data processing that is excessive in relation to the stated processing purposes;
- to ensure the accuracy, adequacy, and relevance of personal data in relation to the purpose of personal data processing;
- to destroy or depersonalise personal data upon achieving the objectives of personal data processing or when it is no longer necessary to achieve these objectives, when the Operator is unable to eliminate violations against personal data, unless otherwise stipulated by the law of the Kyrgyz Republic.

2.2. Personal data processing conditions

The operator processes personal data under at least one of the following conditions:

- Personal data is processed with the consent of the personal data subject to process their personal data;
- Personal data processing is necessary to achieve the purposes provided by law and to perform the functions, powers, and duties imposed on the Operator by the Kyrgyz Republic legislation;
- Personal data processing is necessary for administration of justice, execution of a judicial act, act of another body or official to be executed in accordance with the Kyrgyz Republic legislation;
- Personal data processing is necessary for the performance of an agreement to which the personal data subject is a party, beneficiary, or guarantor, as well as for the conclusion of an agreement at the initiative of the personal data subject or an agreement under which the personal data subject will be a beneficiary or guarantor;
- Personal data processing is necessary for the exercise of the rights and lawful interests of the Operator or third parties or to achieve socially important objectives, provided that the rights and freedoms of the personal data subject are not infringed thereby;
- Personal data to which access is granted to an unlimited range of persons by the personal data subject or at his or her request (hereinafter 'publicly available personal data') is processed;
- Personal data subject to publication or compulsory disclosure in accordance with the law of the Kyrgyz Republic is processed.

2.3. Personal data privacy

The Operator, its employees, and third parties that have access to personal data are obliged not to disclose it to other third parties or disseminate it without the consent of the personal data subject, unless otherwise provided by the law of the Kyrgyz Republic.

2.4. Entrusting personal data processing to another person

The operator has the right to entrust personal data processing to another person with the consent of the personal data subject, unless otherwise provided by the law of the Kyrgyz Republic, on the basis of a contract concluded with that person. The person processing personal data on behalf of the Operator must comply with the terms and conditions of personal data processing stipulated by the 'Personal Information Law' and this Policy.

2.5. Personal data processing of citizens of the Kyrgyz Republic

- 2.6. When collecting personal data, including by means of information and telecommunications network 'Internet', the Operator is obliged to ensure recording, systematisation, accumulation, storage, clarification (updating and changing), and extraction of personal data of citizens of the Kyrgyz Republic using databases located in Kyrgyz Republic territory, except for the following cases:
- 2.7. — Personal data processing is necessary to achieve the purposes stipulated in international treaty of the Kyrgyz Republic or by law, or to implement and perform the functions, powers, and duties imposed on the Operator by the Kyrgyz Republic legislation;
- 2.8. — Personal data processing is necessary for administration of justice, execution of a judicial act, act of another body or official to be executed in accordance with the Kyrgyz Republic legislation;
- 2.9. — Personal data processing is necessary to perform the powers of executive authorities of the Kyrgyz Republic, public extra-budgetary funds bodies, executive authorities of the Kyrgyz Republic, local self-government bodies, and functions of organisations involved in providing respectively state and municipal services, including registration of the personal data subject at the integrated portal for public and municipal services and (or) regional portals of public and municipal services;
— personal data processing is necessary for the professional activities of a journalist and/or the legitimate activities of a mass media outlet or scientific, literary, or other creative activity, provided that the rights and legitimate interests of the personal data subject are not infringed thereby.

3. RIGHTS OF THE DATA SUBJECT

- 3.1. The subject of personal data decides to provide their personal data and consents to its processing freely, of their own free will, and in their own interests. Consent to personal data processing may be given by the subject of personal data or their representative in any form that allows confirmation of its receipt, unless otherwise provided by the law of the Kyrgyz Republic.
- 3.2. The subject of personal data has the right to receive information from the Operator regarding the processing of their personal data, unless such a right is restricted in accordance with the laws of the Kyrgyz Republic.
- 3.3. The subject of personal data has the right to request that the Operator clarify their personal data, block it, or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained, or not necessary for the stated purpose of processing, as well as to take statutory measures to protect their rights.
- 3.4. Personal data processing for the purpose of promoting goods, works, or services on the market through direct contact with the personal data subject (potential consumer) by means of communication, as well as for political campaigning, is permitted only with the prior consent of the personal data subject.
- 3.5. The operator is obliged to immediately cease personal data processing for the aforementioned purposes at the request of the personal data subject.
- 3.6. It is prohibited to take decisions based solely on automated personal data processing that produce legal consequences in relation to the personal data subject or otherwise affect their rights and legitimate interests, except in cases provided by the laws of the Kyrgyz Republic or with the written consent of the personal data subject.
- 3.7. If a personal data subject considers that the Operator is processing their personal data in violation of the requirements of the 'Personal Information Law' or otherwise violates their rights and freedoms, the personal data subject may appeal against the Operator's actions or inaction by contacting the competent authority for the protection of personal data subjects' rights or in court.

4. ENSURING PERSONAL DATA SECURITY

- 4.1. The security of personal data processed by the Operator is ensured by the implementation of legal, organisational, and technical measures necessary to ensure the requirements of Kyrgyz Republic legislation in the field of personal data protection.
- 4.2. To prevent unauthorised access to personal data, the Operator applies the following organisational and technical measures:
 - appointing the officials responsible for organising the processing and protection of personal data;
 - limiting the number of persons allowed to process personal data;
 - making the subjects aware of the requirements of Kyrgyz Republic legislation and the Operator's regulatory documents on the processing and protection of personal data;
 - organising the recording, storage, and handling of media containing personal data;
 - identifying threats to the security of personal data during its processing, creating threat models on the basis of these threats;
 - developing a personal data protection system based on the threat model;
 - checking the readiness and effectiveness of the use of information security equipment;
 - limiting user access to information resources and software and hardware for information processing;
 - registering and recording of users activities in personal data information systems;
 - using anti-virus and recovery tools to protect personal data;
 - using firewalling, intrusion detection, security analysis, and cryptographic protection of information, where appropriate;
 - organising access control to the Operator's premises, security of premises with technical means of personal data processing.

5. FINAL CLAUSES

- 5.1. Other rights and obligations of the Operator in connection with personal data processing are determined by the Kyrgyz Republic legislation in the field of personal data.
- 5.2. Employees of the Operator guilty of violating the rules governing the processing and protection of personal data shall bear material, disciplinary, administrative, civil, or criminal liability in the manner prescribed by the laws of the Kyrgyz Republic.