

Terms and Definitions

Automated processing of personal data - processing of personal data using computer technology. Blocking of personal data - a temporary suspension of the processing of personal data (except for cases when the processing is necessary to clarify personal data).

Personal data information system - a set of personal data contained in databases and information technologies and technical means that ensure their processing.

Depersonalization of personal data - actions as a result of which it is impossible to determine, without the use of additional information, the belonging of personal data to a specific subject of personal data. Processing of personal data - any action (operation) or a set of actions (operations) performed using automation tools or without using such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data. Operator - a state body, a municipal body, a legal entity or an 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. Personal data - any information relating directly or indirectly to a specific or identifiable individual (subject of personal data). Provision of personal data - actions aimed at disclosing personal data to a certain person or a certain circle of persons. Dissemination of personal data - actions aimed at disclosing personal data to an indefinite circle of persons (transfer of personal data) or at acquaintance with the personal data of an unlimited number of persons, including the disclosure of personal data in the media, posting on information and telecommunication networks or providing access to personal data in any other way. Cross-border transfer of personal data - the transfer of personal data to the territory of a foreign state to the authority of a foreign state, to a foreign individual or foreign legal entity. Destruction of personal data - actions as a result of which it is impossible to restore the content of personal data in the personal data information system and (or) as a result of which material carriers of personal data are destroyed.

1. General Provisions This document defines the policy of EkoCars LLC (hereinafter referred to as the Operator) in relation to the processing of personal data and discloses information on the measures taken to ensure the security of personal data at the Operator in order to protect the rights and freedoms of a person and citizen when processing his personal data, including protection rights to privacy, personal and family secrets. This document "Policy of" Eco Cars "LLC regarding the processing of personal data" (hereinafter - the Policy) has been developed in accordance with the Constitution of the Republic of Armenia, which determines the cases and features of processing personal data and ensuring the security and confidentiality of such information. The provisions of this Policy are binding on all employees of the Operator who process personal data, including those working in branches and separate divisions of the Operator. The provisions of this Policy are the basis for organizing work on the processing of personal data at the Operator, including for the development of internal regulatory documents governing the processing and protection of personal data at the Operator. In the event that certain provisions of this Policy come into conflict with the current legislation on personal data, the provisions of the current legislation apply. Subjects of personal data can send their request signed with an enhanced qualified electronic signature to the e-mail address info@ecocars.am The term for considering applications does not exceed 30 (thirty) days from the date of application. This Policy is a document to which unlimited access is provided. To ensure unrestricted access, the Policy, in particular, is published on the official website of the Operator at: <https://ecocars.am>

2. Principles and conditions for the processing of personal data

2.1. Principles of processing personal data The processing of personal data by the Operator is carried out on the basis of the following principles: - legality and fair basis; - restrictions on the processing of personal data to achieve specific, predetermined and legal purposes; - preventing the processing of personal data that is incompatible with the purposes of collecting personal data; - preventing the unification of databases containing personal data, the processing of which is carried out for purposes incompatible with each other; - processing only those personal data that meet the purposes of their processing; - compliance of the content and volume of processed personal data with the stated processing objectives; - preventing the processing of personal data that is redundant in relation to the stated purposes of their processing; - ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of processing personal data; - destruction or depersonalization of personal data upon achievement of the goals of their processing or in case of loss of the need to achieve these goals, if the Operator cannot eliminate the violations of personal data, unless otherwise provided by federal law.

2.2. Personal data processing conditions The operator processes personal data if at least one of the following conditions is met: - processing of personal data is carried out with the consent of the subject of personal data to the processing of his personal data; - the processing of personal data is necessary to achieve the goals stipulated by an international treaty of the Republic of Armenia or by law, for the implementation and fulfillment of the functions, powers and duties assigned by the legislation of the Republic of Armenia to the operator; - the processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another body or official, subject to execution in accordance with the legislation of the Republic of Armenia on enforcement proceedings; - the processing of personal data is necessary for the execution of an agreement to which the subject of personal data is either a party or a beneficiary or a guarantor, as well as for concluding an agreement on the initiative of the subject of personal data or an agreement under which the subject of personal data will be a beneficiary or guarantor; - processing of personal data is necessary to exercise the rights and legitimate interests of the operator or third parties or to achieve socially significant goals, provided that this does not violate the rights and freedoms of the subject of personal data; - processing of personal data is carried out, access to an unlimited number of persons to whom the subject of personal data is provided or at his request (hereinafter - publicly available personal data); - processing of personal data subject to publication or mandatory disclosure in accordance with federal law.

2.3. Confidentiality of personal data The operator and other persons who have gained access to personal data do not disclose to third parties and do not distribute personal data without the consent of the subject of personal data, unless otherwise provided by federal law.

2.4. Publicly available sources of personal data In order to provide information, the Operator may create publicly available sources of personal data of personal data subjects, including directories and address books. With the written consent of the subject of personal data, publicly available sources of personal data may include his last name, first name, patronymic, date and place of birth, position, contact phone numbers, e-mail address and other personal data reported by the subject of personal data. Information about the subject of personal data is at any time excluded from publicly available sources of personal data at

the request of the subject of personal data, an authorized body for the protection of the rights of subjects of personal data, or by a court decision.

2.5. Special categories of personal data The processing by the Operator of special categories of personal data concerning race, nationality, political views, religious or philosophical beliefs, health status, intimate life is allowed in cases where: - the subject of personal data has given his consent in writing to the processing of his personal data; - personal data is made publicly available by the subject of personal data; - the processing of personal data is carried out in accordance with the legislation on state social assistance, labor legislation, the legislation of the Republic of Armenia on pensions for state pensions, on labor pensions; - the processing of personal data is necessary to protect the life, health or other vital interests of the subject of personal data or the life, health or other vital interests of others and it is impossible to obtain the consent of the subject of personal data; - the processing of personal data is carried out for medico-prophylactic purposes, in order to establish a medical diagnosis, to provide medical and medico-social services, provided that the processing of personal data is carried out by a person who is professionally engaged in medical activities and is obliged to maintain medical secrecy in accordance with the legislation of the Republic of Armenia; - processing of personal data is necessary to establish or exercise the rights of the subject of personal data or third parties, as well as in connection with the administration of justice; - the processing of personal data is carried out in accordance with the legislation on compulsory types of insurance, with insurance legislation. The processing of personal data on criminal records can be carried out by the Operator only in cases and in the manner that are determined in accordance with federal laws.

2.6. Biometric personal data Information that characterizes the physiological and biological characteristics of a person, on the basis of which it is possible to establish his identity - biometric personal data - can be processed by the Operator only with the consent of the subject of personal data in writing.

2.7. Ordering the processing of personal data to another person The operator has the right to entrust the processing of personal data to another person with the consent of the subject of personal data, unless otherwise provided by federal law, on the basis of an agreement concluded with this person. The person who processes personal data on behalf of the Operator is obliged to comply with the principles and rules for processing personal data provided for in this Policy.

2.8. Processing of personal data of citizens of the Republic of Armenia The operator ensures collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction of personal data of citizens of the Republic of Armenia using databases located on the territory of the Republic of Armenia.

2.9. Cross-border transfer of personal data The operator is convinced that the foreign state, to whose territory it is supposed to transfer personal data, provides adequate protection of the rights of subjects of personal data, prior to the start of such transfer. Cross-border transfer of personal data on the territory of foreign states that do not provide adequate protection of the rights of subjects of personal data can be carried out in the following cases: - availability of written consent of the subject of personal data for the cross-border transfer of his personal data; - execution of a contract to which the subject of personal data is a party.

3. Rights and obligations

As part of the processing of personal data, the following rights are defined for the Operator and personal data subjects. The personal data subject has the right: - to receive information regarding the processing of his personal data in the manner, form and terms established by the legislation on personal data; - demand clarification of your personal data, their blocking or destruction if the personal data is incomplete, outdated, inaccurate, illegally obtained, is not necessary for the stated purpose of processing or is used for purposes not previously stated when the subject of personal data provides consent to processing personal data; - take measures provided by law to protect their rights; - withdraw your consent to the processing of personal data; - other rights provided for by the legislation on personal data. The operator has the right: - process the personal data of the personal data subject in accordance with the stated purpose; - require the subject of personal data to provide reliable personal data necessary for the execution of the contract, identification of the subject of personal data, as well as in other cases stipulated by the legislation on personal data; - restrict the access of the personal data subject to his personal data if the personal data subject's access to his personal data violates the rights and legitimate interests of third parties, as well as in other cases stipulated by the legislation of the Republic of Armenia; - process publicly available personal data of individuals; - to process personal data subject to publication or mandatory disclosure in accordance with the legislation of the Republic of Armenia; - entrust the processing of personal data to another person with the consent of the subject of personal data; - other rights provided for by the legislation on personal data.

4. Ensuring the fulfillment of the duties of the operator and measures to protect personal data The security of personal data processed by the Operator is ensured by the implementation of legal, organizational and technical measures necessary to meet the requirements of federal legislation in the field of personal data protection. To prevent unauthorized access to personal data, the Operator applies the following organizational and technical measures: - appointment of a person responsible for organizing the processing of personal data; - appointment of those responsible for ensuring the safety of personal data and excluding unauthorized access to them; - appointment of a person responsible for ensuring the security of personal data in information systems; - limiting the composition of persons admitted to the processing of personal data; - familiarization of subjects with the requirements of federal legislation and regulatory documents of the Operator on the processing and protection of personal data; - organization of accounting, storage and circulation of media containing information with personal data; - identification of threats to the security of personal data during their processing, the formation of threat models on their basis; - development of a personal data protection system based on the threat model; - checking the readiness and effectiveness of the use of information security tools; - differentiation of user access to information resources and software and hardware for information processing; - registration and accounting of actions of users of information systems of personal data; - use of anti-virus tools and means of restoring the personal data protection system; - the use of firewalling, intrusion detection, security analysis and cryptographic information protection means, if necessary; - organization of access control to the territory of the Operator, protection of premises with technical means for processing personal data.

5. Final provisions Other rights and obligations of the Operator in connection with the processing of personal data are determined by the legislation of the Republic of Armenia in the field of personal data. Operator's employees guilty of violating the rules governing the

processing and protection of personal data bear material, disciplinary, administrative, civil or criminal liability in the manner prescribed by federal laws.

Date of publication: 01.08.