

# PRIVACY POLICY OF PERSONAL DATA OF "TEL-CELL" CJSC



## 1. Subject of the regulation

1.1. The privacy policy of “Tel-Cell” CJSC (hereinafter referred to as the Policy) defines the rules for processing, using, storing and transferring to third parties the data collected as part of the provision of services by “Tel-Cell” CJSC (hereinafter referred to as the Company).

## 2. Basic concepts

2.1. **Customer** - an individual or legal entity that has used, uses or may use the services provided by the Company, or applied to the Company in order to use such services.

2.2. **Personal data** - any information relating to the Customer, which allows or may allow, directly or indirectly, to identify his person.

2.3. **Processing of personal data** - any operation or set of operations, irrespective of the form and mode of implementation (including automated, with or without use of any technical means) thereof, which is related to the collection either stipulation or input or systematisation or organisation or storage or use or alteration or restoration or transfer or rectification or blocking or destruction of personal data or to carrying out other operations;

2.4. **Use of personal data** - an operation performed upon personal data, which may be directly or indirectly aimed at delivering decisions or forming opinions or acquiring rights or granting rights or privileges or restricting or depriving of rights or achieving other purpose, which give rise or may give rise to legal consequences for the data subject or third parties or otherwise relate to the rights and freedoms thereof.

2.5. **Mobile application** - software provided by the Company on mobile devices, through which an access to the Company's services is provided, as well as the exchange of information (including electronic notifications) between the Customer and the Company is performed.

## 3. General provisions

3.1. The Company collects personal data provided by the Customer by registering on the Company's websites and / or in the mobile application and / or taking any specific actions as part of the registration and submission of personal data.

3.2. The Company processes personal data in accordance with the requirements of applicable law.

3.3. The Company guarantees the confidentiality of the collected information.

3.4. The Company has the right to process personal data (including collection, fixation, entry into the system or storage, use, modification/correction, restoration, transfer, blocking or destruction or other actions) in order to ensure its normal activities, including:

3.4.1. Provision of services to customers

3.4.2. Communication and cooperation with customers,

3.4.3. For internal purposes such as auditing, analysis and data research.

3.5. The Company may store the personal data:

3.5.1. As long as it is necessary to provide customers with the opportunity to use the services they request,

3.5.2. Throughout any period of time established by the legislation of the Republic of Armenia.

3.6. Personal data may also be processed by a third party on behalf of the Company. Such task shall contain the legal grounds and conditions for the processing of Personal Data, the purpose, the list of Personal Data to be processed, the circle of data subjects, the circle of persons to whom Personal Data may be transferred, technical and organizational measures to protect Personal Data and other necessary information.

3.7. The Company uses various security measures and technologies to protect Personal Data from unauthorized access, use, disclosure, modification or destruction in accordance with applicable data protection and privacy laws.

3.8. Personal data shall be stored in secure networks and shall be accessible only to a limited number of persons who have a special right to access such systems and are required to keep the confidentiality of such information.

3.9. The employees of the company shall be obliged to keep the confidentiality of personal data both within the scope of performance of their official or labor duties related to the processing of personal data, and after their termination. In case of violation of this paragraph, the employees of the company shall be held liable in accordance with the procedure established by the internal legal acts of the Company.

3.10. The customers shall protect their password and their computer, phone, or other devices from unauthorized access, as well as ensure that they log out when they are finished using the shared computer. The Company is not responsible for unauthorized access to Personal Data due to the Customer's negligence.

3.11. The customer shall have the right to:

3.11.1. request access to his/her Personal Data stored by the Company;

3.11.2. demand correction of their Personal Data, termination of the processing of his/her Personal Data,

- 3.11.3. request restriction of the processing of his/her Personal Data,
- 3.11.4. withdraw consent to the processing of his/her Personal Data (in the event that the Company processes the Customer's Personal Data on the basis of the latter's consent),
- 3.11.5. receive information about the grounds and purposes of processing the Personal Data, about the data processor, its location (if the processing is carried out by another organization in accordance with the instructions of the Company), the terms of processing,
- 3.11.6. file a complaint with the competent data protection authority if his/her private rights have been violated or if the latter has suffered as a result of the unlawful processing of Personal Data.

3.12. If the Customer objects to the processing of Personal Data or has given consent to the processing, and then decides to withdraw the latter or demand termination of the Processing of his/her Personal Data, the Company shall have the right to terminate the provision of services to such Customer.

3.13. The Website/Mobile Applications of the Company may contain links to other websites. The Company does not control and is not responsible for the content and privacy policies of such other websites/applications.

3.14. The Company uses cookies in order to improve websites and mobile applications. Cookies are small files consisting of a series of letters and numbers that are stored on the customer's device when visiting websites/mobile applications. They allow the owner of the website or mobile application to distinguish this customer from other users of the website/mobile applications. Cookies cannot be used as code or used to transmit viruses, nor can they provide the Company with access to a client's hard drive. The Company does not have the right to access any information stored on the customer's hard drive.

3.15. If the customer does not wish to receive cookies when visiting websites / mobile applications, he/she may change the settings of his browser and / or mobile device, restricting or blocking cookies.

3.16. Cookie data on the Company's websites and/or mobile applications may be used for various purposes, including:

3.16.1. Providing customers with the ability to safely access and navigate the site or mobile application, use eligible services,

3.16.2. The Company provides information about the preferences of customers based on their previous or current actions on the Company's websites and (or) in mobile applications, which provides an opportunity to improve the quality of services provided,

3.16.13. Provision of the ability to store information provided by customers (e.g. name, language, or country of residence), which enhances the capabilities of certain features and makes them more personalized.

## 4. Issuer's details

**Name:** "Tel-Cell" Closed Joint Stock Company  
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