



## PERSONAL DATA PROCESSING POLICY/

### NOTICE ON PERSONAL DATA PROCESSING

#### I. Introduction

Once You start using the Services of "UCOM" Limited Liability Company (hereinafter "Ucom" or the "Company" or "we" in all case forms) and/or enter into a subscription agreement with us, You consent to the processing of Your personal data, including requesting personal data by Ucom in accordance with the terms of this Personal Data Processing Policy (notice on personal data processing).

Ucom undertakes to protect and not to breach the confidentiality of Your personal data, including any information about the Services You use, their location, purpose, destination, volume and other technical conditions.

This notice on personal data processing (hereinafter the "Notice") describes the policy of Ucom on protection of personal data stated in the "General terms and conditions" of Ucom (hereinafter "GTC") and the method/procedure for processing such personal data. This Notice applies to any web page, product, software or service (hereinafter the "Services") associated with Ucom, unless a notice other than this is stated by Ucom in writing.

From time to time we may incorporate changes in this Notice. Therefore, we urge You to visit this website regularly to make sure that the changes are acceptable to you.

By using our Services You accept this Notice.

#### II. Lawful basis for processing personal data

Your personal data are processed on the basis of the provisions of the laws of the Republic of Armenia, including the provisions of the Laws of the Republic of Armenia “On personal data protection” and “On electronic communication”, the RA Government decision N 192-N dated 16/02/2017, the RA Public Services Regulatory Commission's decision N 285-N dated 08/07/2011, the Subscription Agreement being/having been concluded with You, the GTC acting as an integral part thereof and Your consent obtained as a result of acceptance of this Notice.

#### III. The list of personal data being processed, the method of collection of personal data and the list of actions to be performed in respect of personal data

Personal data processing is implementation of certain measures and actions by mechanical and (or) technical means, including personal data collection, entry, comparison, systematization, storage,



transfer, correction, locking, update, modification, dissemination, destruction, depersonalization and blocking, use, study, other actions for achieving objectives defined by this Notice.

In order to use our Services, the person having such an intention is obliged to submit the personal data listed below substantiated by relevant documents:

For legal entities and private entrepreneurs:

- a) representative's ID details, name, surname (patronymic), date of birth, registration and/or actual residence address;
- b) representative's phone number.

For individuals:

- a) ID details (passport, identification card, military ID, officer ID or other identity document stipulated by the laws of the Republic of Armenia) of an individual and his/her representative (if any), name, surname (patronymic), place and date of birth, registration and/or actual residence address;
- b) phone number, e-mail address.

You are obliged to ensure the accuracy, relevance and reliability of the information provided and bear responsibility therefor.

Besides that, for the purpose of ensuring the principles of trustworthiness of personal data processing and the minimum involvement of entities, as well as for customer/subscriber service quality improvement and customer solvency assessment within the framework of Services, Ucom is entitled to apply to secondary sources, in particular the State Information System Operator, and to third persons authorized to collect credit history or to assess creditworthiness (such as credit bureau) for obtaining personal data from databases containing Your personal data mentioned below:

1. SSN;
2. ID details - serial number, date of issue, issuing authority, date of expiry, status (valid, invalid);
3. Name, surname, patronymic;
4. Registration address;
5. Date of birth;
6. Data on given person in the Compulsory Enforcement Service: existence of enforcement proceedings, existence of arrest, the date, the amount of the property seized, the amount of liability;



7. Information on existence of liability in financial organisations, amount of liability.

As far as we will process Your personal data in the minimum quantity necessary for fulfilling the purposes stipulated in Section IV, the personal data received from You will not be obtained from secondary sources.

#### **IV. Purposes of processing Your personal data**

Your personal data will only be processed in the context of the services provided by the Company. Your personal data can be processed for the following purposes:

1. provision of services, improving the quality of customer/subscriber service;
2. assessment of Your solvency;
3. verification of Your identity (identification);
4. verification and update of Your personal data;
5. implementation of debt collection measures;
6. sending information or promotional text or voice messages;
7. sending service provision or debt collection notices;
8. for other purposes stipulated in the Law of the Republic of Armenia “On electronic communication”.

#### **V. How long are Your data retained?**

We periodically review the periods of retention of personal data in accordance with the requirements of the current legislation of the Republic of Armenia and the Company's policy.

Your personal data will be kept in our systems for the duration stipulated by Ucom's procedures and the laws of the Republic of Armenia.

#### **VI. Who can access Your data?**

You authorize Ucom to transfer Your personal data in the Republic of Armenia, as well as outside the territory of the Republic of Armenia to third parties listed below for the processing purposes, which carry out processing, storage and provision of personal data. Transfer of personal data outside the territory of the Republic of Armenia is carried out in accordance with requirements of Article 27 of the Law of the Republic of Armenia "On personal data protection".



For the purposes stipulated in Section IV of this Notice, we may provide Your personal data to the following persons (exchange personal data) only in the extent justified by those purposes and only in case of necessity.

- 1) State Information System Operator for obtaining other data on You defined by this Notice on the basis of the data provided by You;
- 2) third persons carrying out personal data processing, storage and provision of information on fulfilment of liabilities by debtors;
- 3) third persons having been entitled by Ucom to claim or recover under the judicial procedure the debt accumulated by the Subscriber for the Services provided;
- 4) partners, suppliers and service providers of Ucom engaged in the provision of services or conducting research relating to the activities of Ucom;
- 5) agents, dealers, distributors, franchisees or other service providers of Ucom engaged in the sale of Ucom products or services or other similar activities;
- 6) third parties authorized to collect credit history or assess creditworthiness;
- 7) shareholders, representative offices, branches, subsidiaries and affiliates of Ucom;
- 8) RA state authorities as stipulated by the laws of the Republic of Armenia.

## VII. Destruction of Your personal data

Ucom to the extent possible avoids repetition of Your personal data and processes only necessary personal data that may be useful in achieving the purposes stipulated in Section IV of this Notice, as well as other data that should be stored pursuant to legislation of the Republic of Armenia. Other personal data are subject to destruction.

## VIII. Your rights

You have the rights enshrined in the Law of the Republic of Armenia “On personal data protection”.

You have the right to withdraw Your consent to the processing of personal data. In this case, however, we cannot continue to provide Services to You.

You may at any time decide not to receive further promotional information by notifying Ucom thereof.

If You believe that Your personal data have been processed incorrectly or You have a complaint regarding the way Your personal data are processed, You have the right to file a complaint with Ucom. Within certain jurisdictions, You have the right to apply to Ucom for correcting or modifying Your personal data, if they are incorrect or must be updated. You also have the right to demand the deletion of Your personal data, however, due to legal requirements, other obligations and factors it is not always possible.



You may file a complaint with Ucom or data protection authority by specifying how, in Your opinion, data processing by Ucom might have affected Your rights.

Data protection authority in the Republic of Armenia is:

Agency for protection of personal data of the Ministry of Justice of the Republic of Armenia.

#### **IX. Current safety measures for protecting Your personal data from loss, misuse or modification**

We take steps to ensure the safety of Your personal data.

As soon as we receive Your data we make all efforts to ensure security thereof in our systems. Personal data storage system is a set of computer hardware and software. Our operating system consists of periodically updated elements ensuring contemporary safety rules. The system is installed on computer hardware located in our organization, which is protected from computer networks outside our organization and internet by net and protective net routers ensuring contemporary safety rules. System safety rules and personal data protection are constantly under control by employees of Ucom's Informational Security Department.

Personal data are accessible only to those employees who need the said access to perform works aimed at achieving the purposes stipulated by Section IV. Documents containing personal data subject to archiving are subject to storage in the locked premises specially designed for archiving.

Our employees carry out their daily activities in accordance with Ucom's policies and procedures for observing safety of personal data. For the purpose of protecting Your personal data, the contracts concluded with all our partners receiving information containing personal data mandatorily include provisions prohibiting disclosure of confidential information (including personal data).

#### **X. Validity period of the consent**

The validity period of the consent given by accepting this Notice corresponds to the validity period of legal and/or contractual relationships between Ucom and You.

#### **XI. Contact us**

For any questions regarding this Notice on Personal Data Processing or our Data Protection Policy, please contact our Call Center or write to the following addresses:

Tel.: 011 444 444

E-mail: [444@ucom.am](mailto:444@ucom.am)

Address: "Yerevan Plaza" Business Center, 9 Surb G. Lusavorish str., Yerevan 0015, Republic of Armenia