

# UAGRO Market Confidentiality Policy

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## 1. Introduction

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1.1. The Personal Data Privacy Policy for visitors to the website/mobile application, as revised on 03 March 2026 (hereinafter the “Policy”), has been adopted by the Foreign Enterprise in the form of a Limited Liability Company “Vision Digital Groups” (hereinafter the “Company”). It has been developed and approved for the purpose of ensuring the security and safekeeping of confidential data and applies to all information that the Company may obtain about the Buyer and/or Seller in the domains Uagro.uz (hereinafter the “Marketplace”) from any device and in any form of communication with the Company.

1.2. This Policy constitutes an integral part of the User Agreement and the Seller Agreement. By accepting (making an offer acceptance) or signing any such document, the relevant Buyer and/or Seller unconditionally consents to the processing of all information defined below as Confidential Information in accordance with the terms of this Policy.

## 2. Terms and Definitions

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Automated processing of Confidential Information – processing of confidential information using computer equipment.

Blocking of Confidential Information – temporary suspension of the processing of Confidential Information (except where processing is necessary to clarify the Confidential Information).

Information system – an interconnected set of tools and methods used for the storage, processing and output of information for the purposes of its further use.

Information about a legal entity – any information recorded on electronic, paper and/or other tangible media, including, without limitation, the names of legal entities, contact details (postal addresses, email addresses, telephone numbers) and other information received by the Company from Sellers.

IP LLC “Vision Digital Groups” – a Foreign Enterprise in the form of a Limited Liability Company “UAGRO MARKET” (registered under Reg. No. 3099580, TIN: 312741084. Legal address:

Republic of Uzbekistan, Republic of Uzbekistan, Kashkadarya Region,  
Nurabad district, Islamabad Street, House 31.).

Confidential Information – information, including personal data, the confidentiality of which is ensured in accordance with legislation and/or the Company’s internal documents.

Marketplace – the website located on the Internet at <https://uagro.uz/> and the software application (including for mobile devices) providing access to the database of IP LLC “UAGRO MARKET”. The database is an information and reference system containing information about goods and digital content products intended for potential buyers (consumers) of goods and digital content products.

Fraudulent actions – actions committed for gain by means of deception and/or abuse of trust and aimed at the unlawful taking of another person’s property (cash and other material assets) belonging to the Company, Sellers and/or other Buyers. Such actions constitute a crime under Article 168 of the Criminal Code of the Republic of Uzbekistan and are prosecuted in accordance with the procedure established by law.

Depersonalization of personal data – actions resulting in it becoming impossible, without the use of additional information, to determine whether personal data belongs to a specific personal data subject.

Processing of Confidential Information – any action (operation) or set of actions (operations) performed with or without the use of automation tools with respect to Confidential Information, including collection, recording, systematization, accumulation, storage, clarification (update, modification), retrieval, use, transfer (distribution, disclosure, access), depersonalization, blocking, deletion and destruction of Confidential Information.

Personal data (PD) – information recorded on electronic, paper and/or other tangible media relating to an identified individual or enabling such individual to be identified.

Buyer – a legally capable natural person who intends to order or purchase, or who orders or purchases Goods (work, services) from the Seller remotely by placing an order for Goods in the Seller’s online store on the Marketplace.

Post office – a postal communications facility of the Joint Stock Company “O‘zbekiston pochta,” through which Goods are handed over to Buyers of the UAGRO MARKET marketplace.

Provision of Confidential Information – actions aimed at disclosing Confidential Information to a specific person or a specific group of persons.

Seller – an individual entrepreneur, legal entity or self-employed person engaged in the sale of goods through the Marketplace to the Buyer by means of remote selling and registered on the Marketplace.

In the case of a cross-border order, the Seller may be a foreign legal entity that is not a resident of the Republic of Uzbekistan and has entered into an agency agreement with IP LLC “UAGRO MARKET” for the placement of goods on the UAGRO MARKET Marketplace and sells goods through the Uagro Market storefront to individuals – residents of the Republic of

Uzbekistan.

Dissemination of Confidential Information — actions aimed at disclosing personal data to an indefinite circle of persons.

Cross-border transfer of personal data – transfer of personal data by the owner and/or the Company outside the Republic of Uzbekistan.

Cross-border order – an order for goods subject to international delivery and customs clearance, placed by the Buyer through the Uagro Market Marketplace with a non-resident Seller.

Destruction of personal data – actions resulting in it becoming impossible to restore personal data.

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### **3. Subject matter of regulation**

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3.1. This Policy applies to all Confidential Information that the Company and/or its affiliates, including the UAGRO Group of Companies, may receive from the Buyer and/or Seller in the course of their interaction with the Marketplace, as well as in the course of the Company's performance of any agreements and contracts concluded with Buyers and/or Sellers.

3.2. By using the Marketplace (viewing, reading text, sending or uploading information) and providing their personal data, the Buyer and/or Seller gives consent to the processing of personal data in accordance with this Policy.

3.3. The Company processes personal data by collection, systematization, accumulation, storage, clarification (update, modification, correction), use, dissemination (including transfer), depersonalization, blocking and destruction.

3.4. The Company is entitled to carry out cross-border transfer of personal data in accordance with the terms of this Policy and subject to the requirements of the legislation of the Republic of Uzbekistan.

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## 4. Data processing

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4.1. The Confidential Information processed by the Company in relation to Buyers and/or Sellers may vary depending on how the Buyer and/or Seller interacts with the Marketplace and whether the Buyer and/or Seller uses a personal account to access the Marketplace.

4.2. Buyer data:

- Full name;
- Gender;
- Mobile phone number;
- Date of birth;
- Delivery address.

4.3. Data required for a cross-border order:

- First name;
- Last name;
- Patronymic (if any)
- Gender;
- Date of birth;
- Goods delivery address;
- Mobile phone number;
- Passport (ID card) number and series;
- PINFL;

Other information provided for by the customs legislation of the Republic of Uzbekistan

#### 4.4. Seller data:

- Name of legal entity;
- TIN;
- OKED;
- PINFL;
- Bank details;
- Legal and postal addresses;
- Contact details;
- Full name and contact details of the Sellers' representatives;
- Information from Stores (Customers) regarding the User's purchase of their goods and/or services.

#### 4.5. Information received from Sellers for the performance of a cross-border order (based on the requirements of the foreign marketplace):

- Name of legal entity;
- TIN (UIN = Chinese TIN);
- Bank details;
- Legal and postal addresses;
- Contact details;
- Full name and contact details of the Sellers' representatives;
- Information from Stores (Customers) regarding the User's purchase of their goods and/or services.

#### 4.6. Automated data:

- Order statuses; ● Order composition.

4.7. Other information requested by the Company for the purpose of performing obligations under the User Agreement and the Seller Agreement.

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## 5. Cookies technology

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5.1. When visiting the Marketplace, anonymized statistical data about the Buyer and/or Seller are automatically collected from Cookies files, including:

- type of action performed (click, cursor movement, etc.);
- date and time of the action;
- page URL (uniform resource locator);
- referrer (request source URL);
- IP address (without the possibility of using IP addresses in statistics);
- User-Agent (information about the application used by the User to access the resource);
- ClientID (browser identifier via the Cookie file);
- screen resolution of the Buyer's and/or Seller's computer;
- class of the activated HTML element;
- data on the services viewed and selected by the Buyer and/or Seller, including: internal identifiers of the services/goods, names of the services/goods, price of the services/goods;
- data on the number of views of service/goods cards and clicks on service/goods cards;
- data on the content, price and completion status of orders for services/goods placed in the Company's Marketplace;
- data on the fact of filling out forms in the Marketplace, including errors in completing them.

5.2. By using the Marketplace, the Buyer and/or Seller agrees that the Company may use statistical data and files

Cookies for their subsequent processing, and may transfer them to a third party for the conduct of research, the performance of work or the provision of services at the Company's request.

5.3. The Buyer and/or Seller may independently manage Cookies files by changing browser settings. Changes to user settings resulting in Cookies data being blocked may lead to the unavailability of certain components of the Marketplace.

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## **6. Purposes of collection and processing of Confidential Information**

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6.1. The Company processes the personal data of Buyers and/or Sellers exclusively for the purposes for which they were provided, namely:

- provision of access to the Marketplace;
- provision of access to the Buyer's and/or Seller's personal account;
- providing the Buyer and/or Seller with information about the Company and the services currently provided;
- processing and placement of orders for the purchase of services/goods on the Marketplace;
- organization of acceptance of payments and execution of payment for services/goods using the Marketplace;
- familiarization of the Buyer and/or Seller with the Company's legal documents, as well as the exercise of the powers and performance of the duties imposed on the Company by the legislation of the Republic of Uzbekistan;

- establishing feedback, including sending (processing) notifications, requests and applications from Buyers and/or Sellers;
- determining the territorial affiliation of the Buyer and/or Seller to ensure security and prevent fraud;
- distribution of advertising and informational materials and carrying out joint marketing campaigns by the Company and the Group of Companies  
Vision Digital Groups, taking into account the preferences of Buyers and Sellers;
- confirmation of the accuracy and completeness of the personal data provided by the Buyer and/or Seller;
- continuous improvement and enhancement of the Marketplace;
- creation of new products, utilities and offerings of the Company and the Vision Digital Groups Group of Companies.

6.2. In the event of additional purposes or as required by applicable law, the Company may request separate consent to process Confidential Information.

6.3. This Policy applies to Confidential Information obtained both before and after the effective date of this Policy.

6.4. Upon achievement of the purposes of processing, as well as in other cases under the legislation of the Republic of Uzbekistan in the field of processing and protection of personal data, the personal data provided by the Buyer and/or Seller shall be destroyed.

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## **7. Term of processing of Confidential Information**

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7.1. The Buyer and/or Seller consents to the processing of his/her personal data for the entire period required by the Company to achieve the purposes of processing.

7.2. The Buyer and/or Seller has the right at any time to withdraw consent to the processing of his/her personal data by sending a written statement to: Republic of Uzbekistan, Republic of Uzbekistan, Kashkadarya Region, Nurabad district, Islamabad Street, 1, House 31, or to the email address [info@uagroteam.uz](mailto:info@uagroteam.uz).

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## **8. Procedure for collection, storage, transfer and other types of processing of Confidential Information**

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8.1. The Company applies legal, organizational and technical measures to protect Confidential Information from unauthorized or accidental access thereto, as well as from other unlawful acts in relation to Confidential Information, including but not limited to:

- segregation of access to information systems processing personal data;
- prevention of the introduction into information systems processing personal data of malicious programs and embedded code;
- firewalling;
- detection and suppression of intrusions into information systems processing personal data;
- regular assessment of the security of personal data information systems, involving the use of specialized software;
- other measures.

8.2. The Company may also transfer Confidential Information to its affiliates, including companies within the UAGRO Group of Companies, solely for the purposes specified in Section 6 of this Policy.

8.3. For the provision of certain services under the User Agreement and the Seller Agreement, the Company may engage third parties. If such persons require access to Confidential Information, the Company ensures that such access is limited to the scope

necessary to provide the relevant services. In addition, such external service providers must independently comply with all applicable data protection rules. The categories of such recipients include providers of the following types of services: web analytics, data processing, advertising, email newsletters, payment processing, order fulfillment, etc.

8.4. Processing of Confidential Information is carried out both by automated means and without the use of automation tools.

8.5. The Company is entitled to transfer to the Seller, who sells goods on the Marketplace, the Buyer's personal and other data to the extent necessary for the Seller to perform its obligations to the Buyer. This includes, but is not limited to, order processing and fulfillment, delivery arrangements, provision of warranty service, as well as other cases provided for by agreements between the Buyer and the Seller.

8.6. The Company has the right to transfer the data of Sellers and Buyers registered on the Marketplace to state, law-enforcement and regulatory authorities in order to comply with the legislation of the Republic of Uzbekistan.

8.7. The Buyer's and Seller's Confidential Information shall not be transferred to third parties, except in cases related to compliance with applicable law, performance of contractual obligations between Buyers and Sellers of the UAGRO Market marketplace and/or for the purposes of processing Confidential Information in the interests of UAGRO Market.

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## **9. Rights of the owner of Confidential Information**

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9.1. Rights of the Buyer:

- independently make changes and additions to information about himself/herself in the Personal Account on the Marketplace;

- delete his/her personal data provided in the Personal Account on the Marketplace. Deletion of the Personal Account and/or personal data may result in the inability to use the Marketplace;
- request and receive from the Company information concerning the processing of his/her personal data;
- know whether the Company holds his/her personal data and the scope thereof;
- receive from the Company information about the conditions for granting access to his/her personal data;
- withdraw consent to the processing of his/her personal data, except in cases provided for by the applicable legislation of the Republic of Uzbekistan;
- require the Company to temporarily suspend the processing of his/her personal data if the personal data are incomplete, outdated, inaccurate, unlawfully obtained or not necessary for the purposes of processing;
- apply to the authorized state body or court on matters concerning the protection of rights and legitimate interests in relation to his/her personal data.

## 9.2. Rights of the Seller:

- independently make changes and additions to Confidential Information about himself/herself and his/her representatives in the Personal Account on the Marketplace;
- delete Confidential Information provided in the Personal Account on the Marketplace. Deletion of the Personal Account and/or Confidential Information may result in the inability to use the Marketplace;
- know whether the Company holds his/her Confidential Information and the scope thereof;
- receive from the Company information about the conditions for granting access to his/her

Confidential Information;

- require the Company to temporarily suspend the processing of Confidential Information if the Confidential Information is incomplete, outdated, inaccurate, unlawfully obtained or not necessary for the purposes of processing.

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## **10. Final provisions**

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10.1. The Company is entitled to make amendments or additions to this Policy as necessary, and in the event of amendments to the current laws of the Republic of Uzbekistan in the field of protection and processing of personal data.

10.2. The Buyer and/or Seller may always review the current version of the Policy. By continuing to use the Company's website/mobile application, the Buyer and/or Seller confirms his/her consent to the amendments made to the Policy.

10.3. This Policy has been drawn up in two languages: Uzbek and Russian, both having equal legal force.

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