

PRIVACY AND PERSONAL DATA PROTECTION POLICY

This «Privacy and Personal Data Protection Policy» (hereinafter referred to as the «Policy») expresses the position of «Arassa Deniz» IE (hereinafter referred to as the «IE») and the IE's Management regarding the processing, protection, and security of personal data of individuals (personal data subjects).

This «Policy» defines the IE's approach to protecting human and civil rights and freedoms during the processing of personal data obtained in the course of providing professional services, including ensuring the right to privacy, personal, and family secrets.

The IE undertakes to:

- **Protect personal data from unauthorized access, modification, disclosure, and destruction;**
- **Appoint persons responsible for organizing data processing and protection;**
- **Implement organizational and technical security measures;**
- **Conduct employee training;**
- **Store data for the periods established by legislation and internal documents;**
- **Cease data processing upon achieving the processing purposes or upon withdrawal of consent.**

1. Purposes of Personal Data Processing

1.1. The IE processes personal data solely to achieve legitimate and predetermined purposes, including:

- Compliance with the requirements of the Law of Turkmenistan «On Information about Private Life and its Protection» (dated March 20, 2017, No. 519-V);
- Access control and ensuring internal security within the IE;
- Ensuring the safety of employees and the protection of the IE's property;
- Maintenance of accounting records;
- Preparation of tax reporting;
- Maintenance of personnel records;
- Conclusion and execution of contracts;
- Fulfillment of obligations toward IE employees, contractors, customers, consumers, and other third parties;
- And other purposes not contradicting the legislation of Turkmenistan.

2. Legal Grounds for Data Processing

2.1. The processing of personal data is carried out on the basis of:

- Requirements of the legislation of Turkmenistan;
- Consent of the data subject;
- Concluded contracts;
- And other legitimate interests of the IE.

3. Principles of Personal Data Processing

- Legality and fairness of data processing;
- Processing only the data necessary to achieve the stated purposes;
- Limitation of storage periods;
- Accuracy, relevance, and reliability of data;
- Ensuring data security;
- Prohibition on merging databases with incompatible processing purposes.

4. Scope of Processed Personal Data

4.1. **Special Categories:** The IE does not process personal data relating to racial or ethnic origin, political opinions, religious or philosophical beliefs, sex life, or criminal convictions, except in cases directly provided for by the current legislation of Turkmenistan.

4.2. **Categories of Subjects and Data:** The IE may process the following categories of personal data to the extent necessary for its professional activities:

- **IE Employee Data:** full name, date of birth, passport details, registration and residential address, didates in resumes and application forms for employment suitability assessment;

contact information, technical data, details of qualifications, education, and work experience;

- **Client, Customer, and Counterparty Data:** information necessary for the conclusion and execution of contracts, including data of representatives of legal entities;

- **Applicant Data:** information provided by can-

- **Visitor Data:** information about individuals visiting the IE's offices or service points (including data from access control and video surveillance systems, if applicable);

- **Other Data:** any other information, the collection of which is necessary for the fulfillment of the IE's legal obligations or the protection of its interests.

5. Rights of Personal Data Subjects

- To receive information regarding the processing of their data;
- To request clarification, blocking, or deletion of their data;

- To withdraw consent for data processing;
- To appeal against the IE's actions before the authorized bodies.

6. Disclosure of Personal Data to Third Parties

6.1. Personal data may be disclosed:

- With the consent of the data subject;
- Upon request from government authorities in accordance with legislation;

- When engaging third parties to perform IE functions (provided that confidentiality and data protection agreements are concluded).

7. Cross-Border Data Transfer

7.1. The IE carries out the cross-border transfer of personal data only to countries that ensure adequate data protection, or with the written consent of the data subject.

8. Retention Periods for Personal Data

8.1. Personal data is stored no longer than is necessary to achieve the processing purpose, fulfill the terms of a contract, or comply with legal requirements. Upon expiration of the retention period, the data must be destroyed or anonymized.

9. Measures to Ensure Personal Data Security

- Access restriction. Data backup;
- Anti-virus protection and data leak prevention tools;
- Monitoring of the IE's employees' activities;

- Mandatory setting of unique logins and passwords by IE employees for their account access;
- Secure communication channels;
- Regular audits and risk assessments.

10. Liability

10.1. Persons found guilty of violating the requirements of the legislation and this «Policy» shall be subject to disciplinary, administrative, civil, or criminal liability.

The IE Management undertakes to comply with this «Policy», communicate it to all IE employees, update it on a regular basis, and ensure its availability to all Stakeholders.

General Director
«Arassa Deniz» IE
(title)

M. Shvydko
(name)



November 10, 2025
(date)