

**PRIVACY POLICY  
OF FLEXOBO LLC  
IN THE FIELD OF PERSONAL DATA PROCESSING**

This policy of FLEXOBO LLC regarding the processing of personal data of Users (hereinafter — the "Policy") has been developed and published in accordance with the requirements of the Law, including within the framework of measures taken by FLEXOBO LLC aimed at ensuring the operator's fulfillment of obligations provided by the Law, and determines the basic principles, purposes, conditions, and methods of processing Users' personal data, the list of processed personal data, the main rights and obligations of the operator and Users, as well as the measures implemented by FLEXOBO LLC for the protection of personal data. The Privacy Policy of FLEXOBO LLC in the field of personal data processing is available at [flexobo.com](https://flexobo.com)

**1. GENERAL PROVISIONS**

1.1. FLEXOBO LLC, TIN: 312681484 (hereinafter — the "Platform"), within the scope of its activities, processes personal data of users of the website, mobile application, and bot, the functionality of which is implemented on the website at the address: [flexobo.com](https://flexobo.com) (hereinafter — the "Website"), and is the operator of personal data with corresponding rights and obligations determined by the Law "On the Protection of Personal Data" (hereinafter — the "Law"). Subjects of personal data who transmit their personal data and/or data of persons whose legal representatives they are to FLEXOBO LLC, including users of the website, mobile application, and bot, are hereinafter also referred to as "Users." The Operator's services may be provided through the FLEXOBO mobile application, web interfaces, and the Telegram bot [@FLEXOBO\\_bot](https://t.me/FLEXOBO_bot).

1.2. FLEXOBO LLC places as its most important goal and condition for conducting its activities the observance of human and civil rights and freedoms when processing Personal Data, including the protection of the right to privacy, personal and family secrets.

1.3. This Privacy Policy applies to the FLEXOBO Online Platform website ([flexobo.com](https://flexobo.com)), FLEXOBO mobile application ([app.flexobo.com](https://app.flexobo.com)), and Telegram Bot ([@FLEXOBO\\_bot](https://t.me/FLEXOBO_bot)).

The Online Platform (website) does not control and is not responsible for third-party websites to which the User may navigate via links available on the Online Platform website.

1.4. The legal basis for processing personal data is:

- state laws and regulatory legal acts adopted on their basis governing relations related to the activities of FLEXOBO LLC;
- the charter of FLEXOBO LLC;
- civil law transactions and agreements concluded between FLEXOBO LLC and the personal data subject;
- consent to the processing of personal data.

1.5. Use of the website, platform, and bot constitutes direct, unambiguous, voluntary, and unconditional consent of the person to this Policy regarding the processing of personal data and the conditions for processing the corresponding information specified therein, which such person provides to FLEXOBO LLC.

1.6. The User should carefully familiarize themselves with the terms set forth in this Policy, and in case of disagreement with these terms, cease using the Platform, website, and bot and not register on the Platform or transmit personal data to FLEXOBO LLC. FLEXOBO LLC reserves the right, at its discretion, not to provide access to the Platform, website, or bot, or the ability to use functionality to persons who have not expressed consent to this Policy, or have not confirmed their consent subsequently in the event of its amendment. By providing personal data during registration on the Platform / filling in data about themselves in the personal account on the Platform, Users confirm that they thereby give their consent to the processing of personal data by FLEXOBO LLC as provided by the Policy.

## **2. BASIC TERMS USED IN THE POLICY**

2.1. For the purposes of application and interpretation of this Policy, the following basic terms are used (unless the Policy directly indicates otherwise):

- website <https://flexobo.com/> — an internet resource consisting of a set of graphic and informational materials, as well as computer programs, databases, and information placed in them;
- FLEXOBO — an online platform, mobile application for freight transportation that connects shippers, carriers, and logistics companies, helping to optimize the process of searching, booking, and managing freight transportation across CIS countries and the Trans-Caspian Corridor;
- Telegram Bot (@FLEXOBO\_bot) — a software interface in the Telegram messenger located at @FLEXOBO\_bot, providing Users with access to the Application's functionality and Operator's services;
- automated processing of personal data — processing of personal data using computer technology;

- blocking of personal data — temporary cessation of processing of personal data (except in cases where 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 ensuring their processing;
- de-identification of personal data — actions as a result of which it becomes impossible without the use of additional information to determine the belonging of personal data to a specific personal data subject;
- processing of personal data — any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), de-identification, blocking, deletion, destruction of personal data;
- operator — a state body, municipal body, legal entity, or natural person that independently or jointly with other persons organizes and/or carries out the processing of personal data;
- personal data — any information relating to a directly or indirectly identified or identifiable natural person (personal data subject);
- provision of personal data — actions aimed at disclosing personal data to a specific person or specific group of persons;
- distribution of personal data — actions aimed at disclosing personal data to an indefinite group of persons;
- cross-border transfer of personal data — transfer of personal data to the territory of a foreign state;
- destruction of personal data — actions as a result of which it becomes impossible to restore the content of personal data in the personal data information system and/or material carriers of personal data are destroyed;
- User Registration — registration of the User as a user of the Platform for the purposes of Access, conducted through the website and mobile application in accordance with the Offer and Rules;
- Platform — an information technology system belonging to FLEXOBO LLC, including the interface, website, mobile application, and hardware-software complex;
- Seller/Service Provider — any legal entity or natural person providing Users with consulting, informational, and other services using the capabilities of the Platform;

- Access — a paid service provided by FLEXOBO LLC, including the ability to use the Platform's functionality;
- "Cookies" — a small piece of data sent by a web server and stored on the user's computer;
- "IP address" — a unique network address of a node in a computer network built on the IP protocol;
- contact information for privacy matters: (email [info@flexobo.com](mailto:info@flexobo.com), phone: +998 50 999 06 42).

### **3. PRINCIPLES OF PERSONAL DATA PROCESSING**

3.1. Personal data processing is carried out with consideration for ensuring the protection of the rights of personal data subjects (Users) based on the following principles:

3.1.1. Legality: personal data processing is carried out by FLEXOBO LLC on a lawful and fair basis and is limited to achieving specific, predetermined, and lawful purposes.

3.1.2. Sufficiency: only personal data that is adequate in content and volume to the purposes of their processing is subject to processing; excessive processing of data is not permitted.

3.1.3. Compliance: the content and volume of personal data processed by FLEXOBO LLC corresponds to the stated purposes of processing.

3.1.4. Accuracy: during the processing of personal data, FLEXOBO LLC ensures the completeness and relevance of provided and processed data in relation to the purposes of processing personal data.

3.1.5. Necessity: personal data is stored by FLEXOBO LLC in a form that allows identification of the personal data subject for no longer than required by the purposes of processing personal data.

3.2. FLEXOBO LLC protects Data that is automatically transmitted during the viewing of advertising blocks and when visiting pages on which a statistical script ("pixel") is installed: IP address; cookie information; browser information; access time; page address where the advertising block is located; referrer (previous page address).

3.3. The Website may use identification cookies to store both personal and general information. By using the Website, you express your consent to the Website's use of cookies.

3.4. Disabling cookies may result in the inability to access parts of the Website requiring authorization.

3.5. FLEXOBO LLC collects statistics on IP addresses of its visitors. This information is used to identify and resolve technical problems.

#### **4. LIST OF PROCESSED PERSONAL DATA**

4.1. The personal data of Users processed by the Operator includes:

- Last name, first name, patronymic, date of birth;
- Place of birth;
- Nationality, citizenship;
- Full passport data (identification number, passport series, date of issue, and issuing authority);
- Registration address information;
- Image (photograph);
- Email address;
- Pseudonym (nickname);
- User's bank details;
- User's password;
- User's login for registration in the personal account on the Platform;
- Mobile phone number.

4.2. The Operator collects and stores the data specified in clause 4.1 of this Privacy Policy in electronic form, containing information about the User obtained as a result of the User completing and submitting the registration form established by the Operator in the Personal Account.

4.3. The Operator stores only electronic information obtained from the Personal Account on the Platform, specified by the User themselves, containing data about the User.

4.4. Procedure for processing personal data:

4.4.1. The User (personal data subject) provides the Operator with accurate information about themselves.

4.4.2. Only employees of the Operator who are authorized to work with the User's personal data and who have signed a Non-Disclosure Agreement for the User's personal data may have access to the processing of Users' personal data.

4.4.3. Employees authorized to work with Users' personal data perform their duties in accordance with internal local regulatory acts, in particular in accordance with this Privacy Policy.

4.4.4. Processing of Users' personal data may be carried out exclusively for the purposes established by the Privacy Policy and in compliance with the legislation of the Republic of Uzbekistan.

#### 4.5. Storage of personal data:

4.5.1. Users' personal data in electronic form is stored on the Operator's servers.

4.5.2. Protection of access to Users' personal data is ensured by: the use of licensed antivirus programs that prevent unauthorized entry and access to Users' personal data; segregation of employee access rights using user accounts.

4.5.3. Responses to written requests from other organizations and institutions regarding Users' personal data are provided only with the written consent of the User themselves, unless otherwise established by the legislation of the Republic of Uzbekistan. Personal data may be transferred upon official request (order) of authorized and competent state bodies without obtaining Users' consent.

#### 4.6. Transfer and storage of personal data:

4.6.1. Transfer of the User's personal data means the transfer of information through communication channels and/or on physical media.

4.6.2. When transferring the User's personal data, the Operator's employees must comply with the following requirements: not disclose the User's personal data to third parties for commercial purposes; not disclose the User's personal data to third parties without the written consent of the User, except in cases established by law; notify persons receiving the User's personal data that this data may only be used for the purposes for which it was communicated; allow access to Users' personal data only to specially authorized persons.

4.6.3. Transfer of personal data is carried out for the purpose of enabling authorized access to information resources.

4.6.4. Users' personal data is stored primarily on electronic media and processed using automated systems.

4.6.5. Personal data is stored for the period necessary to achieve the purposes listed in this Privacy Policy, but no longer than 3 years from the date of processing of personal data by the Operator.

4.6.6. Upon expiration of the storage period, personal data may be de-identified and destroyed in the manner established by applicable legislation of the Republic of Uzbekistan.

4.7. The Operator takes necessary and sufficient organizational and technical measures to protect the User's personal information from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other unlawful actions by third parties.

4.8. Confidential personal data includes data relating to racial or ethnic origin, community origin, political affiliation or views, religious or philosophical beliefs, criminal records, trade union membership, health status or sexual life, including genetic and biometric data.

## **5. PURPOSES OF PERSONAL DATA PROCESSING**

5.1. FLEXOBO LLC processes, including collects, records, systematizes, stores, clarifies, updates, modifies, extracts, uses, transfers, de-identifies, blocks, deletes, and destroys Users' personal data for the following purposes:

5.1.1. registration and identification of the User registered on the Platform;

5.1.2. maintaining the User's personal account and profile on the Platform;

5.1.3. enabling the User to use Platform functionality, including purchasing Seller Services;

5.1.4. executing civil law relationships;

5.1.5. confirming the accuracy, relevance, and completeness of data provided by the User;

5.1.6. informational support of the User;

5.1.7. interaction with Users, including sending notifications, requests, and information;

5.1.8. conducting statistical and other research regarding the operation of the Platform;

5.1.9. conducting promotions and surveys aimed at improving the quality of Seller Services;

5.1.10. marketing activities and advertising new Platform capabilities.

## **6. METHODS AND CONDITIONS OF PERSONAL DATA PROCESSING**

6.1. The Operator processes Personal Data with or without the use of automation tools.

6.2. When collecting Personal Data, the Operator ensures recording, systematization, accumulation, storage, clarification, extraction of personal data using databases.

6.3. The term of Personal Data Processing is unlimited. The User may at any time withdraw consent to Personal Data Processing by sending the Operator a notification in accordance with Section 7 of this Policy.

6.4. The obligations of the Operator's employees carrying out the Processing and protection of Personal Data, as well as their liability, are determined in accordance with the legislation of the Republic of Uzbekistan.

6.5. To achieve the purposes stated in this Policy, the Operator may communicate Personal Data to third parties, including its affiliated companies, and also entrust the processing of Personal Data to other persons on the basis of an agreement containing confidentiality provisions.

6.6. Personal data may be transferred to third parties with the User's consent. At the same time, the User's consent to the transfer of their Personal Data to third parties is not required:

6.6.1. For the purpose of preventing threats to the life and health of the User;

6.6.2. When consent has been obtained in writing by third parties;

6.6.3. When third parties provide services to the Operator based on concluded agreements;

6.6.4. In other cases established by applicable legislation of the Republic of Uzbekistan.

6.7. Responses to requests from third parties are provided in writing, on the Operator's letterhead.

6.8. The Operator has established the following conditions for the cessation of Personal Data Processing:

6.8.1. Achievement of the purposes of Personal Data Processing;

6.8.2. Loss of the need to achieve the purposes of Personal Data Processing;

6.8.3. Provision by the User of information confirming that Personal Data was unlawfully obtained;

6.8.4. Impossibility of ensuring the lawfulness of Personal Data Processing;

6.8.5. Withdrawal by the User of consent to Personal Data Processing;

6.8.6. Expiration of limitation periods for legal relationships within which Personal Data Processing was carried out.

## **7. PROCEDURE FOR PERSONAL DATA PROCESSING**

7.1. Personal data processing is carried out with the consent of personal data subjects, as well as without such consent in cases provided by the legislation of the Republic of Uzbekistan.

7.2. Only employees of FLEXOBO LLC whose job responsibilities include the processing of personal data are authorized to process personal data.

7.3. By registering on the Platform, the User confirms that they are a legally capable person and possess all rights and powers to transmit personal data to FLEXOBO LLC.

7.4. Personal data processing of Users is carried out under the following conditions:

7.4.1. The User's consent to personal data processing has been provided;

7.4.2. For the performance of contractual obligations of FLEXOBO LLC to the User;

7.4.3. For the performance of other agreements for the provision of Seller Services;

7.4.4. For the exercise of the rights and legitimate interests of the operator or third parties.

7.5. Personal data processing of Users is carried out in the following ways:

7.5.1. automated processing of personal data with or without transfer of obtained information through information and telecommunication networks;

7.5.2. processing of personal data without the use of automation tools;

7.5.3. mixed processing of personal data.

7.6. FLEXOBO LLC does not carry out cross-border transfer of Users' personal data.

7.7. Users, including those who have provided their consent to the processing of personal data, authorize and consent to FLEXOBO LLC transferring Users' personal data to Sellers of Services on the Platform with whom Users enter into corresponding agreements.

7.8. Users hereby acknowledge and confirm (give consent) that FLEXOBO LLC has the right to disclose Users' personal data to third parties in the necessary scope in compliance with the requirements of applicable legislation of the Republic of Uzbekistan.

7.9. FLEXOBO LLC has the right to transfer the User's personal data (and Users hereby express their consent) to the following persons:

7.9.1. state bodies, including investigative and inquiry bodies, and local self-government bodies;

7.9.2. persons specified in the Law;

7.9.3. other persons.

7.10. FLEXOBO LLC has the right to transfer the User's personal data without their consent in cases established by applicable legislation.

7.11. FLEXOBO LLC has the right to entrust the processing of personal data to another person with the consent of the personal data subject, based on an agreement concluded with such person.

7.12. FLEXOBO LLC ceases the processing of corresponding personal data of Users in the following cases:

7.12.1. upon achievement of the purposes of personal data processing;

7.12.2. at the request of the personal data subject if the processed data is incomplete, outdated, or inaccurate;

7.12.3. in the event of withdrawal of consent;

7.12.4. in the event of detection of unlawful processing.

7.13. FLEXOBO LLC does not process special categories of personal data concerning racial, national affiliation, political views, religious or philosophical

beliefs, health status, or intimate life, except in cases provided by the legislation of the Republic of Uzbekistan.

## **8. RIGHTS OF PERSONAL DATA SUBJECTS**

8.1. Personal data subjects (Users) have the right to:

8.1.1. information about their personal data processed by FLEXOBO LLC;

8.1.2. clarification of their personal data, their blocking or destruction;

8.1.3. provision and withdrawal of consent to the processing of personal data;

8.1.4. taking measures provided by applicable legislation for the protection of their rights;

8.1.5. appealing actions or inactions of FLEXOBO LLC to the authorized body or court;

8.1.6. exercising other rights provided by the legislation of the Republic of Uzbekistan.

8.2. The User's right of access to their Personal Data may be restricted in accordance with applicable laws.

8.3. To exercise and protect their rights, the User has the right to contact the Operator. The Operator considers any inquiries and complaints from personal data subjects and takes all necessary measures for their immediate resolution.

## **9. LIMITATION OF LIABILITY**

9.1. The website, platform, and bot are not publicly accessible sources of Personal Data.

9.2. The Operator informs Users that this Policy is applicable only to the Platform. The Operator does not control and is not responsible for the use of any third-party resources.

9.3. The Operator provides Users with the ability to access services through the Telegram bot @FLEXOBO\_bot. Use of the Telegram bot is governed by the terms of the Offer and is considered equivalent to the use of the FLEXOBO mobile application.

9.4. The Operator is not liable for technical failures, restrictions, or cessation of the Telegram messenger's operation.

## **10. MEASURES TO ENSURE OPERATOR'S OBLIGATIONS AND PROTECTION OF PERSONAL DATA**

10.1. Personal data processing is carried out in accordance with the requirements of the legislation of the Republic of Uzbekistan. FLEXOBO LLC ensures the

confidentiality of Users' personal data during their processing.

10.2. FLEXOBO LLC when processing personal data of the Platform:

10.2.1. takes measures necessary and sufficient to ensure the fulfillment of obligations under the Law;

10.2.2. takes legal, organizational, and technical measures to protect personal data;

10.2.3. issues local regulatory acts defining policy and matters of processing and protection of personal data;

10.2.4. appoints a person responsible for organizing the processing of personal data;

10.2.5. familiarizes employees directly involved in personal data processing with applicable legislation;

10.2.6. exercises internal control over compliance with personal data legislation;

10.2.7. publishes this Policy on the Internet;

10.2.8. takes other necessary measures to protect personal data.

## **11. FINAL PROVISIONS**

11.1. For obtaining and transmitting information regarding the processing of personal data, as well as in case of questions regarding this Policy, Users may send corresponding inquiries to FLEXOBO LLC at: [info@flexobo.com](mailto:info@flexobo.com). The subject of the message must indicate that the question concerns the User's personal data.

11.2. The User hereby provides their prior consent to FLEXOBO LLC for the processing of personal data for the purposes of promoting FLEXOBO LLC on the market of goods, works, and services, including receiving informational and advertising mailings. Such consent may be withdrawn by the User through the deactivation link in the corresponding electronic message.

11.3. This Policy has been developed pursuant to the requirements of the Personal Data Protection Law and is approved by the sole executive body of FLEXOBO LLC. The Policy applies to personal data processing relationships that arose both before and after the approval of this Policy.

11.4. FLEXOBO LLC reserves the right to make changes to this Policy from time to time without the prior consent of the User. The new version of the Policy takes effect from the moment of its approval by FLEXOBO LLC and publication on the Website. The User undertakes to regularly review changes to the Policy. Actual use of the Platform by the User constitutes the User's consent to the new version of the Policy.

11.5. Control over the fulfillment of the requirements of this Policy is exercised by an authorized person responsible for organizing the processing of personal data at FLEXOBO LLC. In the absence of such person, the director of FLEXOBO LLC is responsible.

11.6. Liability for violation of the requirements of the legislation of the Republic of Uzbekistan and regulatory acts of FLEXOBO LLC in the field of processing and protection of personal data is determined in accordance with the legislation of the Republic of Uzbekistan.

11.7. The User and FLEXOBO LLC agree that providing consent to the processing of personal data by activating the checkbox "Consent to the processing of personal data" using electronic means on the Platform is considered a proper form of providing consent.

11.8. The User and FLEXOBO LLC agree to apply the electronic form of written documents, including the exchange of messages through the Platform and email.

11.9. The Platform bears no responsibility for the Seller/Service Provider when providing services to Users. All complaints and claims regarding unlawful actions of the Seller/Service Provider of services are accepted directly by the Seller/Service Provider. The Platform acts only as a digital online platform.

## **12. NOTIFICATIONS AND MAILINGS**

12.1. FLEXOBO LLC may send informational messages to Users, including email and push notifications, using the OneSignal service.

12.2. The User has the right at any time to opt out of receiving email and push notifications using settings in the personal account, device settings, or corresponding links in messages.

12.3. When sending notifications using OneSignal, FLEXOBO LLC complies with the requirements of personal data protection legislation, as well as the terms and privacy policy of the OneSignal service.

**CONSENT**  
**to the processing of personal data**

I, \_\_\_\_\_

\_\_\_\_\_

(last name, first name, patronymic — if applicable)

main identity document: \_\_\_\_\_

\_\_\_\_\_

(type of document, series, number, date of issue, name of issuing authority)

registered at the address:

\_\_\_\_\_

hereby give my consent to the processing of my personal data relating exclusively to the following categories of personal data: last name, first name, patronymic; gender; date of birth; type of identity document; identity document data; citizenship; disability information and other data.

I give consent to the use of personal data exclusively for the purposes of reviewing my documents, as well as for storing data about these results on electronic media.

This consent is provided by me for the performance of actions in relation to my personal data that are necessary to achieve the above purposes, including (without limitation) collection, systematization, accumulation, storage, clarification (updating, modification), use, transfer to third parties for information exchange purposes, de-identification, blocking of personal data, as well as the performance of any other actions provided by applicable legislation of the Republic of Uzbekistan.

I have been informed that the recipient of information guarantees the processing of my personal data in accordance with applicable legislation of the Republic of Uzbekistan using both non-automated and automated methods.

This consent is valid until the purposes of personal data processing are achieved or during the information storage period.

This consent may be withdrawn at any time by my written application.

I confirm that, by giving such consent, I act of my own free will and in my own interest.

"\_\_" \_\_\_\_\_ 202\_\_

\_\_\_\_\_

(Signature)

г. / \_\_\_\_\_ /

(Full name)