

Policy of CENTURY DYNAMICS LLC regarding the Collection, Processing, and Protection of Subscribers' Personal Data

Edition as of January 1, 2025

CENTURY DYNAMICS LLC (hereinafter the "Company") values the trust you place in us by providing your personal data, and takes all necessary technical, organizational, and legal measures to protect it. To learn which personal data we collect, how we process and protect it, please read this Company Policy on the collection, processing, and protection of subscribers' personal data (hereinafter the "Policy") carefully.

1. Terms and Definitions

1.1 Unless it directly follows otherwise from the text, the terms below shall have the following meanings:

"MaCloud" – CENTURY DYNAMICS Limited Liability Company, TIN 311482470, address: Republic of Uzbekistan, 100084, Tashkent, Yunusobod district, Posira MFY, Bog'ishamol ko'chasi, 21b-uy website: <https://www.macloud.pro>

"Customers" – individuals and legal entities that are in civil-law relationships with MaCloud, to whom MaCloud provides services and performs work.

"Law on Personal Data" – Law of the Republic of Uzbekistan, dated 02.07.2019, No. ZRU-547

"Personal Data" – any information, relating directly or indirectly to the User, the Customer, or the Applicant, and provided under this Policy, which is processed in accordance with the Law on Personal Data.

"Policy" – this policy for the processing of personal data.

"User" – individuals, including representatives of legal entities, who use the Site.

"Employees" – individuals who currently or previously have been in an employment relationship with MaCloud.

"Site" – the website available at <https://www.macloud.pro>.

"Applicants" – individuals applying or having applied for positions at MaCloud.

"Services" – services provided by MaCloud.

1.2 Terms not defined in this Policy are interpreted in accordance with the legislation of the Republic of Uzbekistan (primarily the Law on Personal Data).

1.3 Use of the Site implies that the User agrees to this Policy.

2. Scope of Processed Data

2.1 With regard to Employees, Users, Customers, and their representatives, MaCloud processes only those Personal Data that:

(a) Are provided to MaCloud by the personal data subjects themselves by filling out forms placed on the Site, which include the following data:

- First name
- Last name
- E-mail
- Phone number
- Other data included in documents attached to the forms (if the personal data subject used this option)

(b) Are provided to MaCloud by the personal data subjects themselves in the following ways:

- By phone
- By email
- By filling out forms
- By attaching documents to application forms on the Site
- By sending original documents by mail
- By other methods



- (c) Were received by MaCloud from other persons with the consent of the personal data subjects
- (d) Were placed in open access by the personal data subject themselves or with their consent
- (e) Were transferred via registration in the personal account on the Site

2.2 With regard to Applicants, MaCloud processes:

- (a) Information provided by the Applicant via the form on the Site or in an application questionnaire
- (b) Information contained in the resume submitted by the Applicant (full name, position, address, phone number, personal email address, date of birth, gender, information on qualifications, and other data)
- (c) Certain data that may be received from recruitment consultants, staffing agencies, or background-check agencies (contact details, biographical data). MaCloud does not process data on Applicants' criminal records. Information about an Applicant's health may be processed to the extent necessary to assess whether specific working conditions are required for the Applicant.

2.3 During each visit to the Site, the following information about Site Users is automatically collected:

- (a) Technical information stored in "cookies," which were sent to your device (including IP address, access data, browser type and version, time zone settings, browser type and version, operating system)
- (b) Information about Site visits (including URLs, the history of transitions to and from the Site and other resources, search queries, page response times and download errors, time spent on individual pages, and information about page interactions)

2.4 MaCloud processes Personal Data from the time it is received and for the period necessary to achieve the purposes of processing.

3. Cookies

We use cookies. A cookie is a small file made up of letters and numbers that we store in the user's browser or on their computer's hard drive, if they agree. Cookies contain information that is transferred to the user's hard drive.

3.1 Types of Cookies and How We Use Them

We regularly scan for cookies on our website and update our cookie list. We classify cookies into five categories:

- **Strictly Necessary Cookies** – These cookies are required for the operation of our website. They include, for example, cookies that enable website visitors to log in to secure areas of our website, use a shopping cart, or use electronic payment services.
- **Analytical / Performance Cookies** – They allow us to recognize and count the number of visitors and see how visitors move around our website while using it. This helps us improve the website's performance by ensuring users can easily find what they are looking for.
- **Preference Cookies** – They are used to recognize users when they return to our website. This allows us to personalize our content for them and remember their preferences (e.g., their choice of language or region).
- **Advertising Cookies** – These cookies record users' visits to our website, the pages they visited, and the links they followed. We will use this information to make our website and the advertising displayed on it more relevant to the interests of the visitors to our website.
- **Remarketing Cookies** – These cookies help us make our products and services known to a larger audience and measure the effectiveness of marketing campaigns.

Depending on the user's location, they can refuse each category of cookies (except for strictly necessary cookies) by clicking "set custom permission" in the cookie banner on our website.

Name	Type	Description	Storage Period	Provider	Link
_PHPSESSID	Strictly Necessary	A general-purpose identifier used to store user session variables.	7 days	—	—
_ga	Analytical	Allows differentiating users; used to identify a visitor and updates with every new interaction on the site.	1 year	Google Analytics	analytics.google.com
_gid	Analytical	Stores and counts pageviews.	24 hours	Google Analytics	analytics.google.com
_gat	Analytical	Limits the number of requests.	1 minute	Google Analytics	analytics.google.com
cid	Analytical	Sets Google Analytics ClientID.	1 year	Google Analytics	analytics.google.com
_ym_d	Analytical	Stores the date of the visitor's first visit to the site.	1 year	Yandex.Metrica	metrica.yandex.com
_ym_isad	Analytical	Used to determine whether the visitor is using an ad blocker.	2 days	Yandex.Metrica	metrica.yandex.com
yandexuid	Analytical	Allows distinguishing visitors.	1 year	Yandex.Metrica	metrica.yandex.com
yuidssc	Analytical	Allows distinguishing visitors.	1 year	Yandex.Metrica	metrica.yandex.com
yabs-sid	Analytical	Allows distinguishing visitors.	1 year	Yandex.Metrica	metrica.yandex.com
ymex	Analytical	Stores auxiliary information for Metrica: the time when IDs are created and their alternative values.	1 year	Yandex.Metrica	metrica.yandex.com
_gcl_au	Advertising	Used by Google AdSense to experiment with the advertising effectiveness on websites that use its services.	3 months	Google AdSense	adsense.google.com
_fbp	Advertising	Used by Facebook to deliver a series of advertising products, such as real-time bids from third-party advertisers.	3 months	Facebook	developers.facebook.com
_IDE	Advertising	Used for targeting, analyzing, and optimizing advertising campaigns in DoubleClick/Google Marketing Suite.	1 year	Google Marketing Suite	marketingplatform.google.com
VID	Remarketing	Transfers parameters into the remarketing code.	1 year	Mail.ru	mail.ru
tmr_lvid	Remarketing	Used to track user interaction with the website.	1 year	Mail.ru	mail.ru
tmr_lvidTS	Remarketing	Used to track user interaction with the website.	11 months	Mail.ru	mail.ru
tmr_detect	Remarketing	Used to track user interaction with the website.	11 months	Mail.ru	mail.ru
mindboxDeviceUUID	Remarketing	A unique identifier of the browser.	1 year	Mindbox	mindbox.net

4. Principles and Legal Grounds for Processing

4.1 MaCloud processes Personal Data in accordance with the following principles:

- (a) Lawfulness of the purposes and methods of processing Personal Data
- (b) The purposes of processing Personal Data must match the purposes predetermined and stated when collecting the personal data
- (c) The scope and nature of the processed Personal Data and the methods of processing must be consistent with the purposes of processing
- (d) Accuracy and timeliness of Personal Data, their sufficiency for the purposes of processing, and the inadmissibility of processing Personal Data that are excessive in relation to the purposes stated when collecting them
- (e) Prohibition on merging databases containing Personal Data created for incompatible purposes

4.2 The legal grounds for MaCloud's processing of Personal Data are:

- (a) The Constitution of the Republic of Uzbekistan
- (b) The Civil Code of the Republic of Uzbekistan
- (c) The Code of the Republic of Uzbekistan on Administrative Liability
- (d) The Labor Code of the Republic of Uzbekistan
- (e) The Criminal Code of the Republic of Uzbekistan

(f) Local regulations governing MaCloud's activities

(g) MaCloud's charter documents

4.3 If the processing of Personal Data is not explicitly provided for by regulatory acts, MaCloud processes Personal Data only if:

- (a) The data subject's consent for MaCloud to process their Personal Data has been obtained (including if such consent is obtained by another entity);
- (b) The processing of Personal Data is necessary to fulfill a contract to which the data subject is a party;
- (c) The processing of Personal Data is necessary to enter into a contract at the initiative of the data subject or a contract under which the data subject is a beneficiary or guarantor;
- (d) The processing of Personal Data is necessary to exercise the lawful rights and interests of MaCloud or third parties;
- (e) The processing of Personal Data is carried out for statistical or other research purposes, subject to the mandatory anonymization of Personal Data by MaCloud;
- (f) The data subject has provided (or requested to provide) open public access to the processed Personal Data.

5. Processing Purposes

5.1 MaCloud processes Personal Data of different categories of data subjects for different purposes. If a data subject belongs to multiple categories, their Personal Data may be processed for the purposes relevant to each such category.

5.2 **Personal Data of Site Users** are processed by MaCloud to achieve the following goals:

- (a) Reviewing Site User inquiries
- (b) Analyzing Site traffic statistics
- (c) Tailoring Site content to improve user experience
- (d) Displaying advertising and informational announcements to Site Users
- (e) Evaluating the effectiveness of marketing campaigns
- (f) Administering the Site, including troubleshooting, data analysis, testing, and ensuring information security

5.3 **Personal Data of Customers and their representatives** are processed by MaCloud to achieve the following goals:

- (a) Fulfilling contracts concluded with Customers
- (b) Engaging in business contacts with Customers and managing relationships with them
- (c) Considering inquiries from Customers
- (d) Sending advertising and informational messages to Customers
- (e) Evaluating the effectiveness of marketing campaigns
- (f) Ensuring MaCloud's ongoing business operations (including legal support, accounting, tax, and management accounting)

5.4 **Personal Data of potential Customers and their representatives** are processed by MaCloud to achieve the following goals:

- (a) Negotiating the possibility of concluding contracts with potential Customers, including identifying and assessing the solvency of potential Customers to detect and prevent fraud
- (b) Engaging in business contacts with potential Customers and managing relationships with them
- (c) Considering inquiries from potential Customers
- (d) Sending advertising and informational messages to potential Customers
- (e) Evaluating the effectiveness of marketing campaigns

5.5 **Personal Data of Applicants** are processed by MaCloud to achieve the following goals:

(a) Considering the possibility of entering into an employment or civil-law contract with the Applicant

(b) Forming a personnel reserve

5.6 **Personal Data of Employees** are processed by MaCloud to achieve the following goals:

(a) Assisting in employment, training, and internal promotion within MaCloud

(b) Ensuring personal safety

(c) Monitoring and evaluating the volume and quality of work

(d) Ensuring the security of MaCloud's property (including setting up access control, controlling the issuance of equipment, and access to information owned by MaCloud)

(e) Organizing Employee insurance

(f) Performing employment contracts with Employees, including calculating and paying salaries, other remuneration, and compensation

(g) Organizing business trips (including assisting Employees in obtaining foreign passports and visas, purchasing tickets, booking hotels)

(h) Ensuring MaCloud's day-to-day operations (including HR administration, legal support, accounting, tax, and management accounting)

(i) Managing human resources

(j) Complying with the legislation of Uzbekistan (including laws against corruption)

5.7 **Personal Data of Employees' relatives** are processed solely to fulfill legal requirements.

5.8 Under mandates from third parties, MaCloud may provide them with services related to the processing of Personal Data. In such cases, Personal Data are processed solely for the purposes established by such third-party mandates (including providing third parties with the IT infrastructure they use to process Personal Data). The cases and procedures for processing Personal Data on behalf of Customers are governed by separate agreements concluded with Customers.

5.9 The purposes for processing Personal Data set forth in this section do not limit MaCloud's right to process data of any categories of data subjects for the purposes of complying with current legislation or protecting MaCloud's rights and legitimate interests.

5.10 Since the described operations match the purposes above, Personal Data may be processed by MaCloud both by automated means and without automation, by collecting, systematizing, storing, updating, using, blocking, transferring, and destroying the data.

6. Transfer of Personal Data

6.1 Personal Data of any categories of data subjects may be transferred by MaCloud to:

(a) Business partners, suppliers, and subcontractors involved in providing the Services, where applicable

(b) IT service providers, including information system operators and technical support service providers, where applicable

(c) Analytics service providers and search engine operators that assist MaCloud in improving and optimizing MaCloud's services, where applicable

(d) Persons with whom MaCloud enters into transactions for the acquisition or sale of the entire business or part of it, where applicable

6.2 If Personal Data is transferred to third parties, MaCloud notifies them of their obligation to maintain the confidentiality of the Personal Data and to use it only for the purposes for which it was transferred.

6.3 Provision of Personal Data to government agencies is carried out in accordance with the requirements of applicable law.

6.4 MaCloud does not transfer Personal Data to other countries.

7. Storage and Protection of Personal Data

7.1 Personal Data are stored in locked and guarded premises. If there is a potential for uncontrolled access by persons not entitled to access the media storing Personal Data, both paper and electronic media containing Personal Data are kept in locked cabinets (drawers, safes). Conditions are created to ensure the preservation and protection of these data from unauthorized access.

7.2 When processing Personal Data in electronic form, organizational, legal, and technical security measures are implemented to prevent unauthorized persons from gaining access. Among other things, these measures include:

- (a)** Modeling threats to Personal Data security
- (b)** Providing physical security in premises where Personal Data information systems are located
- (c)** Defining the list of individuals whose access to Personal Data is necessary for fulfilling their job duties
- (d)** Ensuring the safekeeping of Personal Data media
- (e)** Managing access to Personal Data (including applying password protection)
- (f)** Monitoring Personal Data security (including checking for software updates)
- (g)** Ensuring the availability of Personal Data (including periodic backups)
- (h)** Antivirus protection of Personal Data information systems

7.3 Transferring information via the Internet is not completely secure. Although MaCloud makes every effort to protect Site Users' Personal Data, MaCloud cannot guarantee the security of Personal Data transmitted via the Site. Any such transmission may pose risks for the Site User.

7.4 Site Users, Customers, and their representatives are solely responsible for keeping their access credentials (passwords) confidential, which enable them to access certain Services.

8. Rights of Personal Data Subjects

8.1 Data subjects have the right to:

- (a)** Obtain access to information related to the processing of their Personal Data
- (b)** Demand that MaCloud clarify, block, or destroy Personal Data if the Personal Data are incomplete, out-of-date, inaccurate, unlawfully obtained, or not needed for the stated processing purpose
- (c)** Appeal in court any unlawful acts or omissions by MaCloud in processing and protecting Personal Data, and to take any other measures provided by law to protect their rights

8.2 A data subject has the right to receive information related to the processing of their Personal Data, including:

- (a)** Confirmation that MaCloud is processing the Personal Data
- (b)** The legal grounds and purposes of Personal Data processing
- (c)** The methods MaCloud uses to process Personal Data
- (d)** The name and location of MaCloud, as well as information about the persons who have access to Personal Data or may have it under a contract with MaCloud or under a federal law
- (e)** The Personal Data being processed that concern the relevant data subject, the source of its receipt if a different procedure for providing such data is not established by law
- (f)** The period of Personal Data processing, including the period of storage
- (g)** The procedure for the data subject to exercise the rights provided by the Law on Personal

Data

(h) Information on cross-border data transfer

(i) Information on the location of the database containing the Personal Data

(j) The name (or last name, first name, patronymic) and address of the person carrying out the processing of Personal Data on behalf of MaCloud, if such processing is entrusted or will be entrusted to that person

(k) Other information required by the Law on Personal Data or other federal laws

8.3 Information on the processing of Personal Data is provided to a data subject or their representative upon receipt of a request from the data subject or their representative. The request must include:

- The ID number of the main document certifying the data subject's identity or their representative's identity
- Information on the date of issuance of the document and the issuing authority
- Information confirming the data subject's involvement with MaCloud, or other information confirming that MaCloud processes the Personal Data

The request must be signed by the data subject or their representative.

8.4 If the person who contacts MaCloud with an inquiry or request is not authorized to obtain information related to Personal Data, that person is refused such information. That person receives notice of refusal.

8.5 Responses to inquiries and requests for information revealing processing details of Personal Data are sent within 10 (ten) days of their receipt by MaCloud.

8.6 If an inquiry indicates that MaCloud is processing inaccurate Personal Data or processing Personal Data unlawfully, the individual responsible for reviewing the request shall immediately block such Personal Data during the verification period. In the case of inaccurate Personal Data, blocking is carried out if it does not violate the rights and legitimate interests of the data subject or third parties.

8.7 If the fact of inaccuracy of the processed Personal Data is confirmed based on information provided by the data subject, their representative, or a competent data protection authority, the Personal Data is updated within 7 (seven) working days from the date of submission of such information. If updating cannot be carried out in that time, it is done at the earliest possible date. The data is unblocked upon completion of the update.

8.8 If, after verification, it is discovered that Personal Data is being processed unlawfully by MaCloud, the violation is remedied within 3 (three) working days from the moment the unlawful processing is confirmed. If it is impossible to make the processing lawful, the data is destroyed within 10 (ten) working days from the date the unlawful processing was discovered. The data subject or their representative is immediately notified of the correction of the violation or destruction of the Personal Data; if the inquiry or request was sent by a competent data protection authority, that authority is also notified.

8.9 If a data subject withdraws consent for the processing of their data, MaCloud employees must cease processing the Personal Data and destroy it within 10 (ten) days. The requirements of this clause do not apply if otherwise provided by a contract to which the data subject is a party, beneficiary, or guarantor, or by applicable legislation.

8.10 The data subject has the right to request that MaCloud refrain from processing their Personal Data for marketing purposes. Such processing can be prevented by selecting the relevant checkboxes in the forms used to collect data. The data subject may also exercise this right at any time by contacting MaCloud at support@macloud.pro.

9. Processing Periods

9.1 As a general rule, the periods for processing Personal Data are defined by the consents given by the data subjects to MaCloud. In any case, processing must cease once the

purposes for processing the relevant data have been achieved or if the grounds for processing Personal Data cease to exist (including if previously granted consent for Personal Data processing is withdrawn).

9.2 The processing of data relating to Site Users, Customers, and their representatives for business contacts and the provision of additional information about the Services continues until MaCloud ceases to operate as a legal entity.

9.3 Processing of Applicants' Personal Data continues for 5 (five) years from the day the Applicant is informed of the decision made regarding their candidacy.

10. Policy Changes

10.1 MaCloud may periodically amend this Policy. It is the User's responsibility to review the text of the Policy whenever visiting the Site.

10.2 The new version of the Policy enters into force upon its posting on the Site. If a User continues to use the Site after the new version of the Policy is published, this signifies the User's acceptance of the Policy and its terms.

10.3 If the User disagrees with the terms of the Policy, they must not use the Site.

10.4 Policy changes have no retroactive effect. Information about the date of the latest Policy change is shown at the beginning of the Policy.

10.5 If you discover that MaCloud is processing your Personal Data without your consent, you should immediately contact MaCloud by email (indicated in clause 8.10 of this Policy) to prevent unauthorized use of your data.

11. Contact Information

Questions and comments regarding this Policy may be sent to info@macloud.pro.