

## **Suppliers' Data Protection Privacy Policy**

This Suppliers' Data Protection Privacy Policy (the "Policy") describes how LLC «VEON ADTECH DIGITAL» («Veon»), a subsidiary of VEON Ltd. processes personal data you provide to us (or have provided to us before for the establishment of (pre-)contractual relationship between us) and the information we collect in the course of operating our business.

In this Policy when we refer to Veon or "we"/"us"/"our" we mean LLC «VEON ADTECH DIGITAL» with its registered address at 4th Tepamasjid Street, Tashkent, Uzbekistan.

In this Policy we may also refer to VEON and when we do so, we mean VEON Ltd. with its registered in Amsterdam, the Netherlands. You can find contact details on VEON's website at <https://www.veon.com/get-in-touch>.

We may revise this Policy at any time.

This Policy describes:

- **The Data That We Collect and Where We Get It From**
- **How We Use the Information We Collect**
- **Grounds For Using Your Information**
- **How We Share Information with Third Parties**
- **Keeping Your Information and Information Security**
- **Your Rights**
- **Contact Us**

### **The Data That We Collect and Where We Get It From**

"Personal data" or "personal information" is any information that can be used to identify you or third parties or that we can link to you and third parties (the "Data subject") and which we have in our possession or control.

We collect and process (included by means of automated processing) the following personal data:

- We will process personal information that you give to us in the context of our (pre-)contractual and procurement relationship, such as a full name, title, business contact details (e.g. company telephone number), your business email address or your employees, employment details (e.g. position) and other information relevant to our contractual relationship.
- When you contact us with queries or respond to our communications provided personal information may include full name, title, business contact details, business email address and content, date and time of email correspondence and information about your employer or your business.
- If we collect or receive your personal information in the context of our (pre-)contractual and procurement relationship, we might also receive information from third parties and others such as regulators and authorities. That information could include name, contact details, employment details and other information relevant to our (pre-)contractual relationship.

**Risk Screening:** We may process the abovementioned personal data together with further information (especially date of birth) about individuals related to you or your business (such as executives or Ultimate Beneficial Owners) when conducting so-called risk screenings for certain (potential) business partners. Due to our business, we are obliged to do so under legal or regulatory obligations (AML and KYC regulations). We also rely on our legitimate interests. Before conducting a risk screening based on our legitimate interests, we carry out a case-by-case proportionality assessment, i.e. a balancing of our legitimate interests with the rights and freedoms of the (potentially) affected data subjects.

When carrying out risk screenings, we only process the personal data necessary for this purpose. However, such risk screenings of, for example, international databases and sanctions lists, may contain additional personal information about you and other people related to your employer or business which we do not have received from you so far. This personal information may be submitted to us by third parties (see below).

We have taken appropriate precautions through technical and organisational measures to ensure data security and observe the principles of data protection law of the Republic of Uzbekistan and other jurisdictions where personal data may be processed, in particular that of data minimisation.

### **How We Use the Information We Collect**

We collect personal information for the following purposes and may do the following with personal information:

1. for the performance of a contract and the receipt of services/goods you provide to us;
2. to comply with legal and regulatory obligations that we have to discharge;
3. use it to establish, exercise or defend our legal rights or for the purpose of legal proceedings;
4. use it for our legitimate business interests, such as undertaking business research and analysis, including understanding our contractual relationships and the administration of our business, which may include conducting risk screenings of, for example, international databases and sanctions lists;
5. use it to look into any complaints or queries you may have; and
6. use it to prevent and respond to actual or potential fraud or illegal activities.

### **Grounds For Using Your Personal Information**

Subject to applicable law and the purpose for which we collect your information, we rely on one or more of the following legal grounds to process your personal information, namely:

- **Consent** – we may need consent to process personal information in cases prescribed by the legislation. When third party personal information is provided, you warrant that it has been obtained and transferred to us in full compliance with the laws, and is consistent with the purposes, actions taken in relation to the personal data, and timelines set out in this Policy.
- **Performance of a contract** – we may need to collect and use personal information to enter into a contract with you or to perform our obligations under a contract with you.
- **Legitimate interest** – we may use personal information for our legitimate interests, some examples of which are given above.
- **Compliance with law or regulation** – we may use personal information as necessary to comply with applicable law/regulation.
- **Purposes of collection** – we may use personal information for the purposes described in this Policy or any other legitimate purposes of which we have otherwise notified you.

### **How We Share Information with Third Parties**

We may also share personal information outside Veon. This may include:

- third party suppliers or contractors of either Veon or VEON, bound by obligations of confidentiality, in connection with the processing of personal information for the purposes described in this Policy. This may include, but is not limited to, IT and communications service providers;
- third parties which we and/or VEON use to comply with our AML and KYC obligations. These vendors use advanced screening engines that maintain access to regularly updated databases of Politically Exposed Persons, national Watch Lists and Black Lists, sanctions lists and adverse media profiles; and
- to the extent required by law, regulation or court order. Furthermore, we are under a duty to disclose personal information in order to comply with these legal obligations.

As a result, personal information may be transferred to locations outside Uzbekistan for the purposes described above. Where we transfer personal information outside of the originating jurisdiction, we will ensure that it is protected and transferred in a manner consistent with legal requirements applicable to the information. Personal information of citizens of the Republic of Uzbekistan will be stored in personal data bases on technical means physically located on the territory of the Republic of Uzbekistan and duly registered in the State Register of personal data bases.

### **Keeping Your Information and Information Security**

How long we hold your personal information for will vary, the period of each type of data will depend on:

- the purpose for which we are using your personal information – we will need to keep the information for as long as is necessary for the relevant purpose; and
- legal obligations – laws or regulations may set a minimum period for which we have to keep your personal information.

We will ensure that the personal information that we hold is subject to appropriate security measures. We will keep your personal information in accordance with the legislation of the Republic of Uzbekistan.

### **Your Rights**

Data subjects have a number of legal rights in relation to the personal information that we hold about it and such data subjects can exercise their rights by contacting us using the details set out below. We will respond to inquiries within the timeframes and in the manner prescribed by the laws of the Republic of Uzbekistan

These rights include:

- obtaining information regarding the processing of personal information and access to the personal information which we hold (please note that there may be circumstances in which we are entitled to refuse requests for access to copies of personal information. In particular, the legislation of the Republic of Uzbekistan requires us to limit the right to access the personal information, when such access may infringe rights and legitimate interests of third parties);
- requesting that we correct personal information if it is inaccurate or incomplete;
- requesting that we erase personal information in certain circumstances. Please note that there may be circumstances where you ask us to erase personal information, but we are legally entitled to retain it;
- objecting to, and requesting that we restrict, our processing of personal information in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of personal information but we are legally entitled to refuse that request;

- in some circumstances, receiving some personal information in a structured, commonly used and machine-readable format and/or requesting that we transfer that information to a third party where this is technically feasible. Please note that this right only applies to personal information which you have provided to us;
- withdrawing your consent, although in certain circumstances it may be lawful for us to continue processing without your consent if we have another lawful reason (other than consent) for doing so; and
- lodging a complaint with the relevant data protection authority, if you think that any of your rights have been infringed by us.

## **Contact Us**

If you would like further information on the collection, use, disclosure, transfer or processing of your personal information or the exercise of any of the rights listed above, please contact us by the Republic of Uzbekistan, Tashkent city, 4th Tepamasjid str.