

PERSONAL DATA PROCESSING POLICY IN THE REPUBLIC OF UZBEKISTAN

1. General Provisions

1.1. This Personal Data Processing Policy (hereinafter — the "Policy") has been developed in accordance with the Law of the Republic of Uzbekistan "On Personal Data" No. ZRU-547 dated 02.07.2019 (as amended by Law No. ZRU-1125 dated 26.03.2026) (hereinafter — the "Law") and subordinate acts of the Republic of Uzbekistan.

1.2. The Policy defines the core principles, purposes, legal grounds, procedure and conditions for personal data processing, as well as the measures to ensure its protection, applied by LLC "Baltika Breweries" (hereinafter — the "Owner/Operator") in the course of personal data processing.

1.3. The Policy applies to all personal data processing processes carried out by the Owner/Operator, including processing with and without the use of automation tools.

1.4. The core terms and concepts are used as defined in the Law of the Republic of Uzbekistan "On Personal Data," including:

- **personal data** — information recorded on electronic, paper and/or other tangible media relating to a specific individual or enabling their identification;
 - **personal data subject** — an individual to whom personal data relates;
 - **owner of a personal data database** — a state body, individual or legal entity holding the right of ownership, use and disposal of a personal data database;
 - **operator** — a state body, individual and/or legal entity carrying out personal data processing;
 - **personal data processing** — implementation of one or a set of actions for the collection, systematization, storage, modification, supplementation, use, provision, dissemination, transfer, depersonalization and destruction of personal data;
 - **subject's consent** — a voluntary, specific, informed and conscious expression of will by the personal data subject for the processing of their personal data;
 - **cross-border transfer** — transfer of personal data to the territory of a foreign state.
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2. Principles of Personal Data Processing

2.1. Personal data processing is based on the following principles:

1. **lawfulness and transparency** — processing is carried out in accordance with the legislation of the Republic of Uzbekistan and on a basis understandable to the subject;

2. **purpose limitation** — personal data is processed only for specific, pre-defined and lawful purposes; processing incompatible with these purposes is not permitted;
3. **minimization** — the scope and content of the processed personal data correspond to the processing purposes; data redundancy is not permitted;
4. **accuracy and currency** — personal data is maintained up to date, and measures are taken to delete or rectify incomplete, outdated or inaccurate data;
5. **storage limitation** — personal data is stored no longer than required by the processing purposes, unless otherwise provided by legislation;
6. **confidentiality and security** — protection of personal data against unauthorized access, destruction, modification, blocking, copying, dissemination and other unlawful actions is ensured.

2.2. Personal data processing is permitted solely where a legal basis exists, including:

- where the personal data subject's consent is available;
 - where processing is necessary for the performance of a contract to which the subject is a party;
 - where processing is necessary for the performance of obligations imposed on the Owner/Operator by legislation;
 - where processing is necessary to protect the life, health or other vital interests of the subject;
 - in other cases expressly provided for by legislation.
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3. Purposes and Legal Grounds for Processing

3.1. The Owner/Operator processes personal data for the following purposes:

1. conclusion, performance and termination of contracts (civil-law, labor and other);
2. compliance with the requirements of the legislation of the Republic of Uzbekistan (tax, accounting, archival and other);
3. informing about offered goods and services;
4. review of applications and requests from personal data subjects;
5. communication with personal data subjects.

3.2. The legal grounds for processing are: Law No. ZRU-547 (as amended by Law No. ZRU-1125 dated 26.03.2026), other regulatory legal acts of the Republic of Uzbekistan, the constituent documents of the Owner/Operator, contracts, and the consent of the personal data subject.

3.3. The Owner/Operator does not process special categories of personal data (race, nationality, political views, religious beliefs, health status, intimate life, criminal record) without a proper legal basis and the subject's consent, except in cases expressly provided for by legislation.

4. Categories of Subjects and List of Processed Data

4.1. The Owner/Operator processes personal data of the following categories of subjects:

- employees (including former employees);
- counterparties and their representatives;
- clients and consumers of services;
- website visitors;
- other persons interacting with the Owner/Operator.

4.2. The list of processed personal data is determined by the processing purposes and includes, in particular: surname, first name, patronymic; date of birth; gender; other data.

4.3. The list of specific data categories for each processing purpose is recorded in the Owner/Operator's internal documents (register of processing purposes, list of processed data).

5. Procedure and Conditions for Personal Data Processing

5.1. Personal data processing is carried out in compliance with the requirements of the legislation of the Republic of Uzbekistan.

5.2. **Subject's consent.** Personal data processing, except in cases provided for by legislation, is carried out with the subject's consent. Consent is executed in written form or in the form of an electronic document enabling reliable verification of the subject's will. Consent must contain: information about the Owner/Operator, the processing purposes, the list of data, the validity period of consent, and the procedure for its withdrawal.

5.3. **Data collection.** Personal data is collected directly from the subject, except where data may be obtained from other sources on lawful grounds.

5.4. Personal data storage is carried out on the territory of the Republic of Uzbekistan.

5.5. The personal data databases used by the Owner/Operator are not subject to state registration.

5.6. Cross-border transfer of personal data to the territory of the Russian Federation is carried out on the basis of consent provided by the personal data subject.

5.7. **Use and transfer of personal data**

5.7.1. Personal data is used only for the purposes for which it was collected. Transfer to third parties is carried out: with the subject's consent; upon a lawful request from authorized state bodies; within the framework of contract performance; in other cases provided for by legislation. Transfer is formalized by an agreement with the operator (third party) containing obligations to ensure data confidentiality and security.

5.8. Rights of the subject

5.8.1. The personal data subject has the right to:

1. receive information about the processing of their personal data;
2. request rectification, supplementation, blocking or destruction of inaccurate or unlawfully processed data;
3. withdraw consent to processing;
4. appeal the actions (inaction) of the Owner/Operator to the authorized body and to court;
5. exercise other rights provided for by the Law.

5.9. Subject inquiries

5.9.1. Inquiries from personal data subjects are reviewed in the procedure and within the timeframes established by legislation. The Owner/Operator ensures registration and recording of inquiries.

6. Structural Unit (Authorized Person) for Personal Data Processing and Protection

6.1. In accordance with Model Procedure No. 2, the Owner/Operator establishes a structural unit or appoints an authorized person ensuring personal data processing and protection (hereinafter — the "Authorized Unit/Person").

6.2. The Authorized Unit/Person:

1. organizes and coordinates work on personal data processing and protection;
2. maintains records of personal data databases, processing purposes and data categories;
3. ensures preparation of documents for registration of personal data databases in the State Register of Personal Data Databases;
4. develops and updates internal documents on personal data processing and protection;
5. carries out internal control over compliance with legislative requirements and this Policy;
6. reviews inquiries from personal data subjects and requests from authorized bodies;
7. organizes employee training on personal data processing and protection;

8. interacts with the authorized state body on personal data matters;
9. takes measures to identify and eliminate violations and incidents in the personal data domain.

6.3. The Regulation on the structural unit (job responsibilities of the authorized person) is approved by the head of the Owner/Operator. The rights, duties and responsibilities of the Authorized Unit/Person are determined in accordance with Model Procedure No. 2.

6.4. The Authorized Unit/Person reports directly to the head of the Owner/Operator and is independent in matters of ensuring compliance of personal data processing with legislation.

7. Measures to Ensure Personal Data Security

7.1. The Owner/Operator takes legal, organizational and technical measures to protect personal data against unlawful or accidental access, destruction, modification, blocking, copying, provision, dissemination, as well as other unlawful actions, including:

1. appointment of persons responsible for organizing personal data processing and protection;
2. development and approval of internal documents regulating personal data processing and protection;
3. restriction of employee access to personal data in accordance with their job responsibilities;
4. application of organizational and technical measures (passwords, access rights differentiation, encryption, backup, antivirus protection, access logging);
5. recording of personal data media and their storage locations;
6. training and instruction of employees on personal data processing and protection;
7. internal control and audit of compliance with requirements;
8. taking measures to respond to incidents and notify the authorized body in cases established by law.

7.2. Employees with access to personal data sign a non-disclosure undertaking for personal data. The undertaking remains in force after termination of employment.

7.3. In the event of detection of unlawful processing or leakage of personal data, the Owner/Operator takes immediate measures to eliminate violations, restrict access, restore data and notify the authorized body and subjects in the procedure established by legislation.

8. Destruction and Depersonalization of Personal Data

8.1. Personal data is subject to destruction or depersonalization upon achievement of the processing purposes, upon withdrawal of the subject's consent (unless otherwise provided by legislation), upon expiration of the storage period, as well as in other cases provided for by legislation.

8.2. Destruction of personal data is carried out in a manner excluding the possibility of their recovery, with execution of a destruction act. The fact of destruction is recorded in the accounting journal (register).

8.3. Depersonalization of personal data is carried out in a manner that does not allow determining the attribution of data to a specific subject.

9. Liability

9.1. The Owner/Operator and its employees are liable for violation of the requirements of the legislation of the Republic of Uzbekistan on personal data and this Policy in accordance with legislation.

9.2. Persons guilty of violating the rules of personal data processing and protection are subject to disciplinary, administrative, civil-law and criminal liability in the procedure established by the legislation of the Republic of Uzbekistan.
