

PRIVACY POLICY AND CONSENT TO THE PROCESSING OF PERSONAL DATA

“ANALYTICS SERVICES” LLC (Niyat)

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1. GENERAL PROVISIONS

1.1. This Privacy Policy and Personal Data Processing Policy (hereinafter referred to as the “Policy”) has been developed in accordance with the requirements of the Constitution of the Republic of Uzbekistan and the Law of the Republic of Uzbekistan No. ZRU-547 dated July 2, 2019 “On Personal Data”. This Policy establishes the procedure for processing personal data by “ANALYTICS SERVICES” Limited Liability Company (hereinafter referred to as the “Operator”) and the measures taken to ensure the security of such personal data.

1.2. In carrying out its activities, the Operator considers the observance of human and civil rights and freedoms, including the right to privacy and the protection of personal and family secrets, to be one of its most important objectives and conditions.

1.3. This Policy applies to all information that the Operator may obtain about users through the Niyat mobile application and website (hereinafter collectively referred to as the “Application”).

1.4. By registering in the Application, the User freely, voluntarily and in their own interest provides the Operator with full and unconditional consent to process their personal data, including collection, recording, systematization, accumulation, storage, clarification, retrieval, use, transfer, anonymization, blocking, deletion and destruction, for the purposes and under the conditions set forth in this Policy.

2. BASIC DEFINITIONS

2.1. Automated processing of personal data means the processing of personal data using computer technology.

2.2. Personal data database means an information system containing personal data and enabling the processing thereof.

2.3. Blocking of personal data means the temporary suspension of personal data processing, except where processing is necessary for the clarification of personal data.

2.4. Mobile Application / Website means the Niyat software developed by the Operator that enables Users to conduct investment activities, transfer assets into trust management and receive information regarding the status of their portfolio, including the mobile application and the betrader.uz website.

2.5. Personal data information system means a combination of personal data contained in databases, as well as information technologies and technical means that enable the processing of such data.

2.6. Anonymization of personal data means actions that make it impossible, without the use of additional information, to determine whether personal data belong to a particular User or another personal data subject.

2.7. Processing of personal data means any action or operation, or a set of actions or operations, performed with personal data using automated means or without the use of such means, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, granting access), anonymization, blocking, deletion and destruction of personal data.

2.8. Operator means “ANALYTICS SERVICES” Limited Liability Company, which independently or jointly with other persons organizes and/or carries out the processing of personal data, and determines the purposes of processing personal data, the scope of personal data to be processed, and the actions or operations to be performed with personal data.

2.9. Personal Data means any information directly or indirectly relating to an identified or identifiable User of the Application.

2.10. User means any individual who has access to the Application and uses its functionality, including a Client who has accepted the Public Offer.

2.11. Provision of personal data means actions aimed at disclosing personal data to a specific person or a specific group of persons.

2.12. Distribution of personal data means actions aimed at disclosing personal data to an indefinite group of persons, including the transfer of personal data or making personal data available to an unlimited number of persons, including publication of personal data in mass media, placement in information and telecommunication networks or granting access to personal data by any other means.

2.13. Destruction of personal data means actions as a result of which it becomes impossible to restore the content of personal data in a personal data information system and/or as a result of which physical media containing personal data are destroyed.

3. PRINCIPLES OF PERSONAL DATA PROCESSING

3.1. Personal data shall be processed lawfully and fairly.

3.2. Personal data processing shall be limited to achieving specific, predetermined and lawful purposes. Processing of personal data in a manner incompatible with the purposes for which such data were collected shall not be permitted.

3.3. The consolidation of personal data databases processed for purposes that are incompatible with each other shall not be permitted.

3.4. Only personal data that correspond to the purposes of processing shall be processed.

3.5. The content and volume of processed personal data shall correspond to the declared purposes of processing. Excessive processing of personal data in relation to the declared purposes of processing shall not be permitted.

3.6. When processing personal data, their accuracy, sufficiency and, where necessary, relevance to the purposes of processing shall be ensured. The Operator shall take, and/or ensure the implementation of, necessary measures to delete or clarify incomplete or inaccurate data.

3.7. Personal data shall be stored in a form that allows identification of the personal data subject for no longer than is necessary for the purposes of personal data processing, unless

the retention period is established by law or by an agreement, including the Public Offer, to which the personal data subject is a party, beneficiary or guarantor. Processed personal data shall be destroyed or anonymized upon achievement of the purposes of processing or when the need to achieve such purposes ceases to exist, unless otherwise provided by law.

4. PURPOSES OF PERSONAL DATA COLLECTION

The Operator may use the User's personal data for the following purposes:

4.1. Identification of the User registered in the Application for the purpose of creating an account and providing access to the functionality of the Application.

4.2. Establishing communication with the User, including sending notifications and requests related to the use of the Application and the provision of services, as well as processing inquiries and applications received from the User.

4.3. Providing the User with effective customer and technical support in the event of issues related to the use of the Application.

4.4. Informing the User about Application updates, special offers and prices, as well as sending newsletters and other information on behalf of the Operator.

4.5. Carrying out investment activities, including entering into and performing trust management agreements in respect of investment assets, as well as carrying out transactions involving such assets.

4.6. Performing obligations to the User under executed agreements and the Public Offer.

4.7. Conducting statistical and other research based on anonymized data.

4.8. Transferring data to third parties in the manner and under the conditions provided for by the legislation of the Republic of Uzbekistan and the Public Offer for the purpose of fulfilling contractual obligations.

5. LEGAL GROUNDS FOR PERSONAL DATA PROCESSING

5.1. The Operator shall process the User's personal data only where such data have been independently entered and/or submitted by the User through special forms available in the Application or on the website. By completing the relevant forms and/or submitting their personal data to the Operator, the User expresses their full and unconditional consent to this Policy.

5.2. The Operator shall process anonymized information about the User if such processing is permitted by the User's browser or device settings, including where storage of "cookie" files and the use of analytics technologies are enabled.

5.3. The legal grounds for processing personal data are as follows:

The consent of the personal data subject (User) to the processing of their personal data;

The necessity to perform an agreement (Public Offer) to which the personal data subject is a party, beneficiary or guarantor;

The necessity to comply with the Operator's legal obligations established by the legislation of the Republic of Uzbekistan, including the Law of the Republic of Uzbekistan "On Combating

Legalization of Proceeds from Criminal Activities, Financing of Terrorism and Financing of the Proliferation of Weapons of Mass Destruction”;

The necessity to protect the rights and legitimate interests of the Operator or third parties, or to achieve socially significant objectives, provided that the rights and freedoms of the personal data subject are not violated;

The necessity to protect the life, health or other vital interests of the personal data subject or other persons where obtaining the consent of the personal data subject is impossible.

6. PROCEDURE FOR THE COLLECTION, STORAGE, TRANSFER AND OTHER FORMS OF PERSONAL DATA PROCESSING

6.1. The security of personal data processed by the Operator shall be ensured through the implementation of legal, organizational and technical measures necessary to fully comply with the requirements of applicable legislation governing the protection of personal data.

6.2. The Operator shall ensure the security and integrity of personal data and shall take all reasonably available measures to prevent access to personal data by unauthorized persons.

6.3. Users' personal data shall be collected and systematized in a unified personal data database registered in the State Register of Personal Data Databases of the Republic of Uzbekistan. In accordance with Article 27¹ of the Law of the Republic of Uzbekistan “On Personal Data”, the Operator shall ensure the collection, systematization and storage of personal data of citizens of the Republic of Uzbekistan in personal data databases located on technical means physically situated within the territory of the Republic of Uzbekistan.

6.4. The User's personal data shall be stored for the period necessary to achieve the purposes of processing, but no longer than the following periods:

5 (five) years from the date of the User's last activity in the Application, for the purpose of complying with legislation on combating the legalization of proceeds from criminal activities;

Until the User withdraws their consent, unless the storage of such data is required by law;

In other cases, in accordance with the requirements of the legislation of the Republic of Uzbekistan.

Upon expiration of the above periods, personal data shall be destroyed within 30 days, except where continued storage is required by law.

6.5. The User's personal data shall not be transferred to third parties, except in the following cases:

At the request of authorized state authorities of the Republic of Uzbekistan in accordance with the procedure established by law;

Upon receipt of a relevant request from a court or another duly authorized law enforcement authority;

For the protection of the rights and legitimate interests of the Operator in connection with the User's breach of the terms of the Public Offer;

Within the framework of performance of the Public Offer, including cooperation with the Operator's partners, such as investment intermediaries, banks and payment organizations, to the extent necessary for the provision of relevant services.

When personal data are transferred to third parties, the Operator shall notify the User in writing within 3 (three) calendar days from the date of such transfer, except in cases provided for by Part Three of Article 23 of the Law of the Republic of Uzbekistan "On Personal Data", including where the transfer of data is necessary for the performance of an agreement to which the User is a party.

6.6. In the event of loss or disclosure of personal data, the Operator shall notify the User of such fact.

6.7. The Operator shall take necessary organizational and technical measures to protect the User's personal data from unlawful or accidental access, destruction, modification, blocking, copying, distribution and other unlawful actions by third parties.

6.8. Where decisions affecting the User's rights and legitimate interests or producing legal consequences are made solely on the basis of automated processing of the User's personal data, the Operator shall:

Explain to the User the procedure for making such a decision and the possible legal consequences thereof;

Provide the User with an opportunity to object to such a decision;

Review the objection and inform the User of the results within 10 days;

Explain the procedure for protecting the User's rights and legitimate interests.

7. LIST OF PERSONAL DATA PROCESSED BY THE OPERATOR

7.1. The Operator may process the following personal data of the User:

Surname, first name and patronymic;

Date of birth;

Contact telephone number;

Passport details, including passport series, passport or ID card number and Personal Identification Number of an Individual (PINFL), for identification purposes in accordance with applicable legislation;

Banking details, for carrying out transactions involving investment assets;

Location information;

Device information and IP address;

Information regarding the use of the Application.

7.2. The Operator does not directly store or process Users' biometric personal data, including fingerprints, digital facial models and similar data, in its own information systems. Identification of the User shall be carried out through the MyID remote identification system

or other authorized state systems. The Operator receives from such systems only the verification result (confirmation of identity) and questionnaire data whose transfer is permitted by law.

7.3. The Operator does not process special categories of Users' personal data relating to racial or ethnic origin, political views, religious or philosophical beliefs, health status or intimate life.

8. RIGHTS AND OBLIGATIONS OF THE PARTIES

8.1. The User has the right to:

Obtain information regarding the processing of their personal data to the extent and in the manner provided for by law;

Require the Operator to clarify, block or destroy their personal data if such data are incomplete, outdated, inaccurate, unlawfully obtained or unnecessary for the declared purpose of processing;

Withdraw their consent to the processing of personal data at any time, taking into account the consequences specified in Section 9 of this Policy;

Require the termination of the processing of their personal data, except where processing is mandatory under applicable law;

Appeal against actions or omissions of the Operator to the authorized body responsible for protecting the rights of personal data subjects or through judicial proceedings;

Protect their rights and legitimate interests, including seeking compensation for damages and compensation for moral harm through judicial proceedings.

8.2. The Operator shall:

Provide the User, upon request, with information concerning the processing of their personal data;

Organize the processing of personal data in accordance with the procedure established by the legislation of the Republic of Uzbekistan;

Take necessary legal, organizational and technical measures to protect personal data from unlawful or accidental access, destruction, modification, blocking, copying, provision, distribution and other unlawful actions;

Ensure the collection, systematization and storage of personal data of citizens of the Republic of Uzbekistan in databases located on technical means physically situated within the territory of the Republic of Uzbekistan;

Terminate processing and destroy personal data in cases provided for by law, including where consent is withdrawn or the purposes of processing have been achieved;

Register the personal data database in the State Register of Personal Data Databases in accordance with the established procedure;

Comply with other requirements of applicable legislation regarding the confidentiality and security of personal data.

9. PROCEDURE FOR WITHDRAWAL OF CONSENT TO THE PROCESSING OF PERSONAL DATA

9.1. The User may at any time withdraw their consent to the processing of personal data by sending a notification to the Operator at info@betrader.uz with the subject line “Withdrawal of Consent to Personal Data Processing”.

9.2. Upon receipt of such notification, the Operator shall cease processing the User’s personal data, including ceasing to use such data for the provision of services, marketing and other purposes, and shall destroy such data within 30 days, except where the storage of data is required by law (see Clause 9.3). The Operator shall notify the User that the data have been destroyed or archived.

9.3. After withdrawal of consent or termination of the Agreement, personal data may and shall continue to be stored in the following cases:

Where necessary for the Operator to comply with obligations imposed by legislation on combating the legalization of proceeds from criminal activities and the financing of terrorism — for a period of 5 years;

For the protection of the Operator’s rights and legitimate interests in judicial proceedings — for the duration of the applicable limitation period;

Where there are outstanding financial obligations between the Parties.

9.4. Upon deletion of the User’s account, their personal data shall be destroyed or anonymized, except for:

Data that must be retained in archives pursuant to applicable law, including passport data and transaction history;

Telephone numbers and unique device identifiers, which may be retained in the Operator’s security database in hashed or otherwise protected form exclusively for the purpose of preventing re-registration of blocked users, combating fraud and ensuring system security, which constitutes a legitimate interest of the Operator.

10. SMS NOTIFICATIONS

10.1. Registered telephone numbers of Users may be used by the Operator without obtaining additional consent exclusively for the following service-related purposes:

Sending SMS messages containing confirmation codes (OTP) for registration, authorization (login) and transaction confirmation;

Notifying the User of important events related to the status of their investment assets, including income accrual and changes to portfolio status;

Providing security alerts regarding suspicious account activity;

Sending legally significant notifications, including notifications regarding amendments to this Policy or the Public Offer.

10.2. Use of a telephone number for sending informational, marketing and advertising communications shall be permitted only with the User’s separate consent, expressed by

selecting the corresponding checkbox in the settings or during registration. The User has the right to unsubscribe from advertising communications at any time by using the “Unsubscribe” function in the received message or by changing notification settings in the Application.

11. SPECIFIC FEATURES OF PERSONAL DATA PROCESSING UNDER THE PUBLIC OFFER

11.1. Upon acceptance of the terms of the Public Offer by the User, the Operator obtains the right to process personal data for the following purposes:

Performing obligations relating to the provision of trust management services for investment assets;

Providing related services necessary for the implementation of the terms of the Offer, including investment intermediary services and cash settlement services;

Transferring data necessary for ensuring performance of obligations under the Offer to third parties.

11.2. Personal data necessary for the performance of the Public Offer may be transferred to third parties — partners of the Operator, including investment intermediaries, commercial banks and payment organizations — only to the minimum extent necessary for the provision of relevant services and the execution of transactions involving assets.

11.3. An up-to-date list or categories of third parties to whom personal data may be transferred shall be published on the Operator’s official website and in the mobile application and may be updated by the Operator unilaterally without prior individual notification to Users.

12. USER’S CONSENT TO THE PROCESSING OF PERSONAL DATA

By registering in the Niyat Application and/or using its functionality, the User:

12.1. Confirms that:

They have fully reviewed this Privacy Policy before commencing use of the Application;

They fully understand all terms and purposes of personal data processing;

They understand the legal consequences of granting consent;

They provide their personal data voluntarily, freely, of their own will and in their own interest.

12.2. Provides the Operator with their full, unconditional and informed consent to the processing of their personal data in accordance with the terms set forth in this Policy.

12.3. Consents to the following actions being performed with their personal data:

Collection, recording, systematization, accumulation and storage;

Clarification (updating, modification), retrieval and use;

Transfer to third parties (distribution, provision, granting access) in the cases and in the manner provided for by this Policy, including cross-border transfer where necessary for the performance of the Offer;

Anonymization, blocking, deletion and destruction.

12.4. The consent applies to:

All personal data specified in Section 7 of this Policy;

All processing purposes listed in Section 4 of this Policy;

The entire period of use of the Application and an additional period of 5 (five) years following cessation of use, for archival purposes and for compliance with legislation on combating the legalization of proceeds from criminal activities.

12.5. Methods of expressing consent include:

Selecting the special checkbox “I accept the terms of the Privacy Policy” during registration or authorization;

Completing the identification procedure through the MyID system, which shall be treated as equivalent to a handwritten signature;

Continuing to actually use the Application after publication of a new version of the Policy.

13. FINAL PROVISIONS

13.1. The User may obtain any clarification regarding matters related to the processing of their personal data by contacting the Operator at info@betrader.uz.

13.2. The Operator has the right to amend this Policy unilaterally. A new version of the Policy shall enter into force from the moment it is published in the Application or on the website, unless otherwise provided in the new version of the Policy.

13.3. This Policy shall remain in effect indefinitely until replaced by a new version. The current version of the Policy is publicly available on the Internet at betrader.uz and in the Niyat mobile application.

13.4. This Policy and all relations arising between the User and the Operator in connection with the application of this Policy shall be governed by the applicable legislation of the Republic of Uzbekistan.

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