

## **LiTRO App – Privacy Policy (hereinafter referred to as the “Policy”)**

The Application collects certain Personal Data of Members/Users.

### **Data owner and controller**

The joint venture in the form of a limited liability company “LiTRO App” LLC JV (JV LLC “LiTRO App”), TIN 311 752 980, Tashkent city, Yunusabad district, Barhayot Mahalla, Block 12, Building 20A

**Contact email address of the Owner:** [info@litro.uz](mailto:info@litro.uz)

### **Categories of collected Data**

The categories of personal data collected by the Application (either independently or through third parties) include:

- Trackers;
- Data on the use of network resources;
- Permission to access the camera;
- Permission for approximate (short-term) location;
- Permission to access the photo library (write-only);
- Contact details of the Members/Users: first name; last name; date of birth; phone number; email address; password; city; precise location.

Full details on each category of collected Personal Data are provided in the relevant sections of this Policy or in specific explanatory texts displayed prior to the collection of the Data.

Personal Data may be provided voluntarily by the Member/User, or, in the case of Usage Data, collected automatically when using the Application.

Unless otherwise specified, all Data requested by the Application is mandatory. Failure to provide such Data may make it impossible for the Application to provide its services. In cases where the Application expressly states that certain Data is not mandatory, Members/Users are free not to provide such Data without any consequences on the availability or functioning of the Application's Services. Members/Users who are uncertain about which Personal Data is mandatory are welcome to contact the Owner.

The Application or third-party service providers used by the Application may use Cookies (or other tracking tools) solely for the purpose of providing the Service required by the Member/User, as well as for any other purposes described in this document and, if applicable, in the Cookie Policy.

Members/Users are responsible for any third-party Personal Data obtained, published, or shared through this Application and confirm that they have the third party's consent to provide the Data to the Owner.

### **Method and place of Data processing**

#### **Methods of processing**

The Owner takes appropriate security measures to prevent unauthorized access to the Data, its disclosure, alteration, or unauthorized destruction.

Data processing is carried out using computers and/or IT-enabled tools, in accordance with organizational procedures and methods strictly related to the stated purposes. In some cases, the Data may be accessible, in addition to the Owner, to certain categories of responsible persons involved in the operation of this Application (administration, sales department, marketing department, legal department, system administrators), or to external organizations (such as third-party technical service providers, mail carriers, hosting service providers, IT companies, communications services), whom the Owner may appoint, if necessary, as Data Processors.

## **Legal basis for processing**

The owner may process Personal Data relating to Members/Users if one of the following conditions applies:

- The Members/Users have given their consent for one or more specific purposes. Note: Under certain laws, the Owner may be allowed to process Personal Data until the Member/User objects to such processing (“opt-out”), without having to rely on consent or any other legal basis listed below. However, this does not apply when the processing of Personal Data is subject to European data protection law;
- The provision of Data is necessary for the performance of an agreement with the Member/User (hereinafter – the “Agreement”) and/or for any pre-contractual obligations thereof;
- Processing is necessary for compliance with a legal obligation to which the owner is subject;
- Processing is related to a task that is carried out in the public interest or in the exercise of official authority vested in the owner;
- Processing is necessary for the purposes of the legitimate interests pursued by the owner or by a third party.

In any case, the owner will gladly help clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

## **Place**

The Data is processed at the Owner’s operating offices and in any other locations where the parties involved in the processing are located.

Depending on the location of the Member/User, the transfer of Data may involve transferring the Member’s/User’s Data to a country other than their own.

If such a transfer takes place, Members/Users may find out more by checking the relevant sections of this document or by contacting the Owner using the information provided in the contact section.

## **Retention period**

Personal Data shall be processed and stored for as long as required for the purposes for which it was collected.

Accordingly:

- Personal Data collected for purposes related to the performance of an Agreement between the Owner and the Member/User shall be retained until such Agreement has been fully performed.
- Personal Data collected for the purposes of the legitimate interests of the Owner shall be retained as long as needed to fulfill such purposes. Members/Users may find specific information regarding the legitimate interests pursued by the Owner in the relevant sections of this document or by contacting the Owner.

The Owner may be allowed to retain Personal Data for a longer period if the Member/User has given consent to such processing, until the consent is withdrawn. Furthermore, the Owner may be required to retain Personal Data for a longer period when required to do so for compliance with a legal obligation or by order of an authority.

Upon expiration of the retention period, Personal Data shall be deleted. Therefore, the right of access, the right to erasure, the right to rectification, and the right to data portability cannot be exercised after the expiration of the retention period.

## **Purpose of processing**

The collection of Data concerning the Member/User is carried out to allow the Owner to provide the Service through the Application, comply with legal obligations, respond to law enforcement requests, protect its rights and interests (or those of Members/Users or third parties), detect any malicious or fraudulent activity, as well as for the following purposes: Analytics, Permissions for accessing data

stored on the User's device, Registration and authentication carried out directly by the Application, Registration and authentication, Location-based interactions, and Contacting the Member/User. Members/Users may find specific information regarding the Personal Data used for each purpose in the section "Detailed Information on the Processing of Personal Data."

### **Permissions for accessing data stored on the member's/user's device**

Depending on the specific device of the Member/User, the Application may request certain permissions that allow it to access Data on the Member's/User's device, as described below.

Such permissions are granted by the Member/User before any information is processed. Once permission has been granted, it may be revoked by the Member/User at any time. To revoke permission, the Member/User may use the device's system settings or contact the Owner using the contact information provided in this document.

The procedure for managing access permissions may vary depending on the device and software used by the Member/User.

Please note that revoking one or more access permissions may affect the proper functioning of the Application.

If the Member/User grants the permissions listed below, the corresponding Personal Data will be processed (accessed, modified, or deleted) by the application.

### **Camera access permission**

Used to access the camera, photos, and videos stored on the device.

### **Photo library write-only access permission**

Used to access the Member's/User's photo library for write-only purposes.

### **Approximate (short-term) location access permission**

Used to access the approximate location of the Member's/User's device.

The Application may collect, use, and share the Member's/User's location data to provide location-based services.

The Member's/User's geographic location is determined on a non-continuous basis. This means the Application is not capable of constantly determining the exact location of the Member/User.

### **Detailed information on the processing of personal data**

Personal Data is collected for the following purposes and using the following services:

#### **Analytics**

The services described in this section allow the Owner to monitor and analyze web traffic and may be used to track Member/User behavior.

#### **Appsflyer (AppsFlyer Ltd)**

Appsflyer is an analytics service provided by AppsFlyer Ltd.

Personal Data processed: Usage data; Trackers.

[Place of processing: Israel – Personal Data Privacy Policy – Opt-out](#)

### **Location-based interactions**

#### **Non-continuous geolocation (application)**

The Application may collect, use, and share the Member's/User's location data in order to provide services based on location.

Most web browsers and devices provide built-in settings to disable this functionality by default. If explicit permission is granted, the Application may record the Member's/User's location data.

The Member's/User's geographic location is determined on a non-continuous basis: either upon a specific request by the Member/User or when the Member/User does not manually specify their

current location in the appropriate field and allows the Application to determine the location automatically. Personal Data processed: Precise location.

#### **Permissions for accessing data stored on the Member's/User's Device**

Use of the Application implies that the Member/User grants specific permissions to access information stored on their device under the conditions outlined below.

#### **Permissions for accessing data stored on the Member's/User's Device (application)**

Use of the Application implies that the Member/User grants specific permissions to access information stored on their device under the terms of this document.

Personal Data processed: Camera access permission; Photo Library write-only access permission; Approximate (short-term) location access permission

#### **Registration and authentication performed directly by the application**

By completing the registration or authentication process, Members/Users allow the Application to identify them and grant access to specific services.

Personal Data is collected and stored solely for the purposes of registration or identification. Only the Data necessary to provide the requested service is collected.

#### **Direct registration (application)**

The Application collects Personal Data directly from the Member/User by means of a registration form completed during the registration process.

Personal Data processed: email address; city; date of birth; first name; phone number; password; last name.

#### **Registration and authentication**

By completing the registration or authentication process, Members/Users allow the Application to identify them and grant access to specific services.

Depending on the following, third parties may provide registration and authentication services. In such cases, the Application may access certain Data stored by these third-party services for the purpose of registration or authentication. Some of the services listed below may also collect Personal Data for targeting and profiling purposes (see each service's description for more information).

#### **Sign in with Apple (Apple Inc.)**

Sign in with Apple is a registration and authentication service provided by Apple Inc. When Users are required to provide an email address, Sign in with Apple may generate a private, relay email address on behalf of the Users, which forwards messages to their verified personal email account without revealing the actual address to the Owner. Personal Data processed: email address; first name; phone number; last name.

[Place of processing: USA – Personal Data Privacy Policy.](#)

#### **Google OAuth (Google LLC)**

Google OAuth is a registration and authentication service provided by Google LLC and connected to the Google network.

Personal Data processed: various categories of Data as specified in the privacy policy of the service.

[Place of processing: USA – Personal Data Privacy Policy.](#)

## **Contacting the Member/User**

### **Phone contact (application)**

Members/Users who have provided their phone number may be contacted for commercial or promotional purposes related to the Application, as well as for handling technical support requests. Personal Data processed: phone number.

## **Additional information on the processing of personal Data**

### **Push notifications from the server to the client**

The Application may send notifications from its servers to the Member/User to achieve the purposes stated in this Privacy Policy. In most cases, Members/Users can opt out of receiving server notifications by adjusting the settings on their devices, such as mobile phone notification settings, and modifying them so that the Application or certain/all apps on the device have their own preferences. Members/Users should be aware that disabling server notifications may adversely affect the usefulness of the features provided by the Application.

### **Sale of goods and services online**

Collected Personal Data is used to provide the Member/User with services or to sell goods, including handling payments and possible delivery. Personal Data collected for payment purposes may include credit card details, bank account numbers used for wire transfers, or other supported payment methods. The type of Data collected depends on the payment system used by the Application.

### **Rights of Members/Users**

Members/Users may exercise certain rights regarding their Data processed by the Owner.

In particular, Members/Users have the right, to the extent permitted by law, to:

Withdraw their consent at any time. Members/Users have the right to withdraw consent if they have previously given consent to the processing of their Personal Data.

**Object to the processing of their Data.** Members/Users have the right to object to the processing of their Data if the processing is carried out on a legal basis other than consent. More details are provided in the section below.

**Access their Data.** Members/Users have the right to know if the Owner is processing Data, obtain information on certain aspects of the processing, and receive a copy of the Data being processed.

**Verify and request correction.** Members/Users have the right to verify the accuracy of their Data and request its update or correction.

**Restrict the processing of their Data.** Members/Users have the right to restrict the processing of their Data. In this case, the Owner will not process the Data for any purpose other than storage.

**Request deletion or other removal of their Personal Data.** Members/Users have the right to request the deletion of their Data by the Owner.

**Receive their Data and transfer it to another controller.** Members/Users have the right to receive their Data in a structured, commonly used, and machine-readable format and, if technically feasible, to have it transmitted to another controller without hindrance.

**Lodge a complaint.** Members/Users have the right to file a complaint with the relevant data protection authority.

### **Information on the right to object to Data processing**

Where Personal Data is processed for public interest purposes, in the exercise of official authority vested in the Owner, or for the purposes of the legitimate interests pursued by the Owner, Members/Users may object to such processing by providing a reason related to their particular situation.

However, Members/Users should be aware that if their Personal Data is processed for direct marketing purposes, they may object to such processing at any time and free of charge, without providing any justification.

Once a Member/User has objected to processing for direct marketing purposes, their Personal Data shall no longer be processed for such purposes. Members/Users can determine whether the Owner is processing Personal Data for direct marketing purposes by referring to the relevant sections of this document.

### **Procedure for exercising the above rights**

Any requests to exercise the rights of the Member/User may be directed to the Owner using the contact details provided in this document. No fee is charged for handling such requests. The Owner will respond as soon as possible, and no later than within one month, providing the information required by law. The Owner shall notify each recipient to whom the Personal Data has been disclosed (if any) of any rectification, erasure, or restriction of processing, unless this proves impossible or involves disproportionate effort. Upon request, the Owner will inform the Members/Users about such recipients.

### **Additional information about Data collection and processing**

#### **Legal proceedings**

The Member's/User's Personal Data may be used by the Owner for legal purposes in court or in the stages leading to possible legal action arising from improper use of the Application or the related Services.

The Member/User acknowledges that the Owner may be required to disclose Personal Data upon request of public authorities.

#### **Additional information about the Member's/User's Personal Data**

In addition to the information contained in this Policy, the Application may provide the Member/User with additional and contextual information concerning particular Services or the collection and processing of Personal Data upon request.

#### **System logs and maintenance**

For operation and maintenance purposes, the Application and any third-party services may collect files that record interactions with the Application (system logs) or use other Personal Data (such as the IP address) for this purpose.

#### **Information not contained in this policy**

More details concerning the collection or processing of Personal Data may be requested from the Owner at any time.

#### **How “Do not track” requests are handled**

The Application does not support “Do Not Track” requests. To determine whether any of the third-party services used honor the “Do Not Track” requests, please read their respective privacy policies.

#### **Changes to this privacy policy**

The Owner reserves the right to make changes to this privacy policy at any time by notifying Members/Users on this page and possibly within the Application and/or — as far as technically and

legally feasible — by sending a notice to Members/Users via any contact information available to the Owner. It is strongly recommended to check this page frequently, referring to the date of the last modification listed at the bottom.

If the changes affect processing activities performed based on the User's consent, the Owner shall collect new consent from the Member/User, where required.

## **Definitions and Legal References**

### **Personal Data (or Data)**

Any information that directly, indirectly, or in connection with other information — including a personal identification number — allows for the identification or recognizability of a natural person.

### **Usage Data (network resources)**

Information collected automatically through the Application (or third-party services employed by the Application), including: IP addresses or domain names of the computers used by Members/Users, URI addresses (Uniform Resource Identifier), the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's response (successful, error, etc.), the country of origin, browser and operating system characteristics used by the Member/User, details about the time spent on each page (e.g., time spent on each page within the Application), and details about the path followed within the Application with special reference to the sequence of pages visited, as well as other parameters about the device's operating system and/or the User's IT environment.

### **Member/User**

The individual using the Application, who, unless otherwise specified, coincides with the Data subject.

### **Data subject**

The natural person to whom the personal Data refers.

### **Data processor (or Data administrator)**

The natural or legal person, public authority, agency, or other body that processes personal Data on behalf of the Data controller.

### **Data controller (or Owner)**

The natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of Personal Data, including the security measures concerning the operation and use of the Application. Unless otherwise specified, the Data Controller is the Owner of the Application.

### **Application**

The means by which the Personal Data of the Member/User is collected and processed.

### **Service**

The service provided by the Application as described in the relative terms (if available) and on this site or application.

### **European Union (or EU)**

Unless otherwise specified, all references made within this document to the European Union include all current Member States of the European Union and the European Economic Area.

### **Cookie**

Cookies are Trackers consisting of small sets of data stored in the User's browser.

**Tracker**

Tracker means any technology — e.g., Cookies, unique identifiers, web beacons, embedded scripts, electronic tags, and fingerprinting — that enables the tracking of Users, for example by accessing or storing information on the User's device.

**Legal information**

This privacy statement has been prepared based on provisions of multiple legislative acts, including Art. 13/14 of Regulation (EU) 2016/679 (General Data Protection Regulation — GDPR).

Unless otherwise specified in this document, this privacy policy applies solely to this Application.

**Last updated: 09 July 2025**