#### PRIVACY POLICY

Dear user, this Privacy Policy governs the procedure for the use and protection of your personal data derived when using the online store and the services we offer through the online store.

The Privacy Policy applies to the data collected on the online store called online store, and by registering on this online store, you confirm your acceptance of the Privacy Policy terms. According to the requirements of the law of the Republic of Azerbaijan, PASHA Insurance OJSC shall collect and process only personal data you enter on the online store. By entering your personal data on online store, you consent to the collection and processing of such data by PASHA Insurance OJSC.

#### 1. Definitions

- Online store PASHA Insurance Online Store (pasha-insurance.az)
- PASHA Insurance PASHA Insurance Open Joint Stock Company
- Personal data any information that allows directly or indirectly identifying an individual.
- <u>Special category personal data</u> data on an individual's race or ethnicity, family life, religious beliefs, health status, or criminal record
- Collecting personal data obtaining an individual's personal data according to the law
- <u>Processing of personal data</u> operations with personal data (recording, systematizing, updating, changing, deleting, depersonalizing, storing, providing, destructing personal data)

## 2. Obligation to Protect Personal Data

Since we consider the protection of your personal data privacy one of the important factors, we have taken the required technical and organizational measures in this regard. The personal data we collect and process is protected by applicable law. Note that according to the requirements of Article 5, paragraph 2 of the Law of the Republic of Azerbaijan On Personal Data, your personal data is not provided to third parties, except as otherwise provided by law or with your consent.

If you are already a client of PASHA Insurance, the Company undertakes to protect your personal data as a policyholder or insured person, constituting an insurance secret, according to the Law of the Republic of Azerbaijan On Insurance.

#### 3. Data Sources

The data we collect is aimed at providing you with the most suitable and quality services and improving their level. This data is collected as follows:

## a. Data Provided by You

We collect data that you enter through the online store. The personal data obtained in this way is information you provide solely of your free will. To allow us to provide you with quality and, most importantly, appropriate services, you should correctly and completely enter all the data requested from you on the online store. Please also note that if you do not enter the data required to arrange the service you request through the online store, we will not be able to fulfill your request. You are responsible for the correctness and completeness of the data provided. Incorrect and/or incomplete data may affect the validity of the insurance product you have requested, our liability as an insurance company to you and/or the insured person and/or that of our insurance intermediaries, and the insurance payment. In this case, PASHA Insurance does not bear any liability. You shall be liable for any damage caused to PASHA Insurance as a result of incorrect and/or incomplete data specified.

## b. Automatic Data Collection Tools - Cookies

Cookies are small text files, stored on your computer, tablet, or mobile phone. These files store your IP address, the type of browser program you use, the date and duration of your use of the site, the site sections you use, etc. Like many websites, PASHA Insurance uses cookies and other technologies to improve the site user servicing level.

By using this online store, you agree to the storage and access of PASHA Insurance to the data on your device. If you do not agree to the use of cookies, leave the online store, otherwise change your cookie settings according to the effective Privacy Policy. Please note that some online store features may be inaccessible if cookies are not allowed.

#### c. Data from Other Sources

To arrange insurance services and regulate and investigate new insured events, we can also collect your personal data, placed on electronic media of appropriate state bodies, the financial market supervisory authority, and the Compulsory Insurance Bureau, the provision of which is not prohibited by law.

### 4. What Data Will Be Collected?

- a. When you use the Online store, our web server automatically logs the following *details*:
  - IP address,
  - Type of browser used,
  - The site sections you use,
  - Date and duration of use of the site, etc.
- b. We will also collect and process various *personal data*:
  - Full name,
  - Gender,
  - Address,

- Company name, activity, or profession,
- Contact details, etc.
- c. Depending on the insurance product, according to the law, we will collect and process information, classified as special category personal data by the laws of the Republic of Azerbaijan:
  - Family status,
  - Health conditions.

# 5. Data Processing

We will use free and confidential personal data you provide for several purposes, including but not limited to:

- Settlement of an insurance contract (e.g., reference, underwriting, processing of insured events).
- Market research and analysis, improvement of processes, services, and products,
- Providing information on our events, services, products, and innovations,
- Monitoring fraud, money laundering, and terrorist financing,
- Complying with any legal obligations (e.g., tax, accounting, and administrative ones),
- Providing to the Financial Market Supervisory Authority based on the latter's written request on issues related to the performance of regulatory and supervisory functions in the insurance system, as well as relevant inspectors of the Financial Markets Supervisory Authority during on-site inspections.

Your personal data will only be provided to another party with your consent unless applicable laws and regulations do not require obtaining your consent.

#### 6. Who Can Access The Data

We as PASHA Insurance may share your personal data with the following third parties for the above purposes and according to the law:

- To provide services to you, PASHA Insurance may share your personal data with government agencies, IT companies assigned to provide technical support, our insurance agents, other insurers, co-insurers, reinsurers, brokers, and banks,
- The data may be shared with PASHA Holding LLC and its other subsidiaries acting as data processors, technical consultants, specialists, lawyers, doctors, experts, companies providing operational services (IT, mail), etc.,
- Data may be shared to comply with any legal obligations, including to the relevant regulatory authority if you file a complaint about a product or service we provide,
- Special category data may be shared with doctors and healthcare providers to arrange your health insurance.

We do not share your personal data with unrelated third parties for their marketing needs without your permission.

#### 7. Links to Other Sites

Links to other sites may be provided on the online store. PASHA Insurance shall not be responsible for the content or privacy policies of other sites. Other sites have different data collection and privacy policies. Therefore, we recommend you read the privacy policies of other sites you access through the online store.

### 8. Other Terms of Use

PASHA Insurance reserves the right to add, change, or remove the Privacy Policy provisions at any time without prior notice. By using the online store after such changes are made, you accept those changes.

PASHA Insurance strives to regularly update the information displayed on the online store. However, PASHA Insurance does not guarantee the accuracy and completeness of the data provided by the User on th online store.

PASHA Insurance shall not be liable for any direct or indirect damage that may result from the use of the online store, except for direct damage caused by the Company intentionally or due to a gross mistake.

According to the Law of the Republic of Azerbaijan On Personal Data, the User shall be entitled to reject the collection and processing of his/her personal data. The user shall express his/her rejection to us in writing or online. Users are not required to justify their rejections.