## PERSONAL DATA PROTECTION AND PRIVACY POLICY

This privacy policy was compiled by "EKENG" CJSC (hereinafter referred to as "We") and it is intended for people (hereinafter referred to as "user" or "you") who use this xID Armenia application (hereinafter referred to as the Application) and are interested in how their personal data is used by the processor of personal data.
"EKENG" CJSC is the operator of the application and the accredited certification authority in Armenia, which issues electronic signature and authentication certificates for citizens.

Please read this Privacy Policy carefully.

## 1. Introduction

During the registration and further usage of the application we need personal data to provide high quality services.

We have developed the list of minimum data that is necessary for the provision of services
During the registration, we obtain your public services number, which serves as a ground for issuing a certificate.

For the registration in the Application you may choose the following options for identification:

- In the application by providing personal data and passing a liveness check,
- Through a visit to Operator's office.


## 2. Legal grounds

The application of the electronic digital signature is regulated by the Law "On Electronic Document and Electronic Digital Signature" which prescribes that electronic document protected by the electronic digital signature has the same legal force as the document signed with a handwritten one.

Legal grounds for the Application are the Law on electronic document and electronic digital signature and Government Decree N 572-Ъ dating May 25th, 2017 of the Republic of Armenia.

Your personal data is processed in accordance with the RA Law on Personal Data Protection.
The procedures of processing, storage, and archiving of personal data are executed in accordance with the legislation of Armenia, other legal acts, as well as the Guideline on Processing of Personal Data by State Bodies, issued by the Personal Data Protection Agency of the Ministry of Justice of Armenia.

## 3. Data collection

During registration in the Application, you provide the following data:

- Name and Surname
- Date of birth
- Identity document (ordinary passport/biometric passport, ID card)
- Photo
- Face biometrics
- Mobile Phone number

In order to process the data presented above, we must have the consent of the data subject which is provided by the data subject clicking the Confirm button in the Application.

In case of registering in the Application through passing a liveness check, you agree to the processing of your biometric data.

Biometric data includes an image of your face captured from video by your phone camera.
Biometric data is not processed if you choose other registration methods.
Based on the submitted data, EKENG issues two certificates: one for electronic signature and the other one for electronic authentication.

The PIN codes of the certificated are created by you during the registration, and they are not stored anywhere.

The data you provide is checked with the data registered in the State Population Register of the Police of the Republic of Armenia.

We store the following data:

- Your PSN
- Mobile phone number
- Geolocation, from where you signed into the application
- Date and time of login attempts (successful and failed), IP addresses
- Device type


## 4. Data security

Your data is accessible to a limited number of employees determined by the job responsibilities regarding the processing of personal data.

We use appropriate methods of data collection, storage, processing and take security measures to protect data from unauthorized intrusion, change, disclosure or destruction. Data provided by you will be used exclusively for official or business purposes and it will not be used for private or any other purposes.

For ensuring the proper functioning of the Application We may request access or permission to certain features of your mobile device, including your mobile device's camera and microphone, in order to perform a liveness check. If you wish to change the access provided to us, you may do so in your device's settings.

If you think that your rights to personal data protection have been violated, you can lodge an application with the Personal Data Protection Agency and send them your request.

## 5. Third party

We transfer your PSN to the Third Party, in case of your successful authentication (log into the platform) on the platforms of state, local self-government bodies or other service providers (Third Party) through the Application.

## 6. Changes to The Privacy Policy

This Privacy Policy shall be updated from time to time in response to changing legal, regulatory or operational requirements. We will inform you on any changes by updating the "Last updated" date of the Privacy Policy. You are encouraged to periodically review this Privacy Policy to stay informed of the updates.

The validity period of this agreement ends with the deletion of the Application and all the data contained in it from your smartphone, as well as with submitting a request to the operator to deactivate your account. Logs of your actions performed prior to the deactivation shall be kept in accordance with the legal requirements.

## 7. Contact us

If you have any questions or comments about the Privacy Policy, please contact us at: "EKENG" CJSC

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