

# PRIVACY POLICY

Version dated April 20, 2026

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## 1. GENERAL PROVISIONS

- **1.1.** This policy regarding the processing of personal data (hereinafter – the "Policy") is developed to ensure the protection of human and civil rights and freedoms during the processing of personal data, including the protection of rights to privacy, personal and family secrets, in accordance with the legislation of the Kyrgyz Republic on personal data.
- **1.2.** This Policy applies to all personal data that Limited Liability Company "Casher" (hereinafter – the "Operator") may obtain about the User during their use of the "Casher" Mobile Application (hereinafter – the "Application") and the Website located at: <https://casher.com>.
- **1.3. Key Definitions:**
  - **Personal Data Operator (Operator):** Limited Liability Company "Casher" (LLC "Casher"), TIN 02512202510164, address: Kyrgyz Republic, Bishkek, Leninsky district, Sovetskaya st., 4.
  - **Application:** "Casher" software intended for installation on mobile devices running iOS and Android operating systems.
  - **Website:** The Operator's internet resource located at: <https://casher.com>.
  - **User:** A natural person using the Application or the Website.
- **1.4. Rights and Obligations of the Operator:** The Operator is obliged to use data exclusively for the specified purposes, maintain confidentiality, and promptly update or destroy data upon request or once purposes are achieved.
  - The Operator has the right to delegate processing to third parties (e.g., verification providers) with the subject's consent.

## 2. PRINCIPLES AND LEGAL GROUNDS

- **2.1.** Processing is carried out based on the principles of legality, proportionality of data volume to stated goals, and data accuracy.
- **2.2.** The grounds for processing are: the subject's consent (provided during registration or via web tag), performance of a contract, and requirements of the legislation of the Kyrgyz Republic (including AML/CFT regulations).

## 3. AGE RESTRICTIONS

- **3.1.** The Operator's services and use of the Application are intended exclusively for persons who have reached the age of **18 years**.
- **3.2.** The Operator does not knowingly collect or process the personal data of minors.

## 4. PROCESSING PURPOSES AND MOBILE PERMISSIONS

- **4.1.** The Operator processes personal data for the purposes of Client identification, providing access to an account, performing asset transactions, as well as for compliance with anti-money laundering and countering the financing of terrorism (AML/CFT) legislation.
- **4.2.** To ensure Application functionality and completion of the verification procedure, the User may grant the following permissions on a mobile device:
  - **Camera:** Used for real-time KYC selfies and photographing original documents.
  - **Photo / Gallery:** Used for uploading document images for identity verification purposes.
  - **Notifications (Push):** Used to inform about transaction status, account security, and important service changes.
  - **Biometric data (FaceID / TouchID / Fingerprint):** The Application may request access to device biometrics for authorization.
  - The Operator does not gain access to the biometric templates themselves — verification is performed on the device's operating system side.
  - **4.3.** The Operator retains personal data for the periods necessary to achieve the processing purposes. Data collected as part of KYC/AML procedures shall be retained for at least 5 (five) years from the date of termination of relations with the Client, in accordance with the requirements of the legislation of the Kyrgyz Republic on AML/CFT. Other personal data shall be destroyed or anonymized upon achievement of the processing purposes or withdrawal of the subject's consent, unless otherwise provided by law.

## 5. TECHNICAL DATA AND TRACKING

- **5.1.** The Application may use third-party tools (SDKs) to analyze stability and improve user experience:
  - **Analytical SDKs:** Collection of anonymized data about application feature usage to optimize the interface.
  - **Crash Reporting:** Collection of diagnostic data on software crashes to ensure the technical health of the Application.
  - **Push Services:** Use of Apple Push Notification service (APNs) and Firebase Cloud Messaging (FCM) for notification delivery.
- **5.2.** App Tracking Transparency (ATT): The Application does not use advertising identifiers (IDFA) and does not track the User across third-party applications and websites for advertising purposes.
- **5.3.** Instead of cookies, the Mobile Application may use technical device identifiers (IDFV), audit logs, and diagnostic data necessary for maintaining security and correct account operation.

## 6. DATA TRANSFER TO THIRD PARTIES AND SUMSUB

- **6.1.** To comply with legal requirements (KYC/AML), the Operator uses the services of a specialized provider — the company **Sumsub** (Sum&Substance).
  - User personal data (document photos, selfies) are transferred to the specified party exclusively for identity verification purposes based on a contract.
- **6.2.** The Operator ensures the primary recording and storage of Users' personal data on servers located within the territory of the Kyrgyz Republic.
- **6.3.** For purposes of KYC/AML verification, delivery of push notifications, and ensuring the operation of the Application, certain categories of personal data may be transferred and

**processed outside the territory of the Kyrgyz Republic, including by: Sumsb (identity verification), Apple Push Notification service (APNs), and Firebase Cloud Messaging (FCM) (notification delivery). Such transfer is carried out on the basis of the subject's consent and contracts with the aforementioned parties; data is transmitted in encrypted form, and the Operator adopts measures to ensure its security.**

- The Operator guarantees the adoption of measures to ensure data security during such transfers.

## 7. PROTECTION AND CONTACT PROCEDURE

- **7.1.** The Operator applies modern encryption methods (SSL/TLS) during data transfer and organizational access protection measures.
- **7.2.** The data subject has the right to demand clarification, blocking, or destruction of their data, as well as to withdraw consent by sending a request via email: **office@casheron.com** or to the address: Kyrgyz Republic, Bishkek, Sovetskaya st., 4.

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Operator Information:

- **Limited Liability Company "Casheron" (LLC "Casheron")**
- **Registration Number:** 323938-3301-000
- **TIN:** 02512202510164
- **Address:** Kyrgyz Republic, Bishkek, Sovetskaya st., 4
- **E-mail:** office@casheron.com