

I. General Provisions

1. “Menq” Limited Liability Company (hereinafter referred to as “LLC”) operates the armnic.com website (hereinafter referred to as “Website”). We are committed to protect and respect the privacy of our users (hereinafter referred to as “Your”) and ensure your security when using our services published on the Website and established by the General Terms and Conditions of the Website (hereinafter referred to as “Services”). The purpose of this policy is to inform you of LLC policies regarding the collection, use, disclosure and other processing of Your personal data when you use our Services.
2. We use Your data to provide and improve our Services. By using the Services, You give Your consent to the acquisition, use or for other processing of Your data in accordance with this policy. In case of using Your personal information for secondary purposes, we will contact You to obtain Your direct consent also providing You with rejection opportunity.
3. The terms used in this policy.
 - 3.1. **Registry:** organization that manages Top Level Domains.
 - 3.2. **Registrar:** armnic.com:
 - 3.3. **Domain name holder:** A subject competent to conclude civil law contract that has registered (renewed) in Registry database a second level domain name (such as "armnic.com") or a third level domain name at ".com.am", ".co.am", ".org.am", ".net.am", ".commune.am", ".համայնք.հայ" domain zones (such as " armnic.com.am" or "armnic.net.am" through Registrar.
 - 3.4. **Website visitor:** anyone who visits the Website and uses it for a specific purpose.
 - 3.5. **Personal data:** any personally identifiable information that allows or can allow to directly or indirectly identify the person.
 - 3.6. **Processing of personal data:** any operation or set of operations, irrespective of the form and mode of implementation (including automated, with or without use of any technical means) thereof, which is related to the collection either stipulation, input, systematization, organization, storage, use, alteration, restoration, blocking, destruction of personal data or to carrying out other operations that are not restricted by the legislation of the Republic of Armenia.
 - 3.7. **Services:** services provided by the Registrar, the descriptions and terms of which are provided in the General Terms and Conditions of the Website.
 - 3.8. **Registry database:** A database of registered domain names containing the information specified in the 7th paragraph of this Policy, as well as other mandatory information necessary to ensure the operability of domain names.
 - 3.9. **"Whois" service:** information provision on a domain name from Registry database through publicly accessible search engine.
 - 3.10. **Third party:** any person, body, institution or organization that is not the data subject, processor or authorized person of personal data and whose rights or legitimate interests are affected or may be affected as a result of the processing of personal data.
4. If you have any questions regarding your personal data, please contact our Data Protection Officer at info@menqconsulting.am.

II. Processing of Data Provided by the Domain Name Holder When Registering a Domain Name

5. When registering a domain name Registrar has the right to collect, enter or carrying out other operations with the personal data of the Domain name holder and transfer them to the Registry.
6. Domain name registration means ensuring the operability of domain name in the Registry database via entering, verifying, registering and carrying out other operations with the information specified in the 7th paragraph of this policy.
7. To ensure a domain name operability, along with the entry of the domain name the following information is entered in the Registry database:
 - 7.1. the first name, the last name, registered address or place of residence, postal code of the physical entity who wants to become the domain name holder of the given domain name,
 - 7.2. the name, location (legal address), postal code of the non-physical entity that is competent to conclude a civil law contract and wants to become the domain name holder of the given domain name, the organizational-legal form in case of being legal entity, the legal status in case of being other subject,
 - 7.3. the administrative, technical and financial contacts data (first name, last name, e-mail address, telephone number) of the subject that is competent to conclude a civil law contract and wants to become the domain name holder of the given domain name. Moreover, in case of being a physical entity who wants to become the domain name holder of the given domain name, the data of that physical entity shall be entered, if the latter hasn't authorized another person (persons) to act as his/her administrative, technical and financial contact as defined by law.
8. In order to use the Services, the person who wants to become the domain name holder shall provide the Registrar with the personal data specified in paragraph 7th of this Policy.
9. In order to use the services of the Registrar and to ensure the operability of the registered domain name, the transfer of the personal data required in paragraph 7th of this Policy represents the consent of the Domain name holder, as well as his/her/its administrative, financial and technical contacts, to transfer this data to the Registry.
10. By the request of the Domain name holder, the data specified in paragraph 7th of this policy may not be published in the “Whois” service.
11. The provision of the data required by paragraph 7th of this policy is purposed to obtain the Services by the Domain name holder, and the failed or incomplete provision of the information is the basis for the Registrar to refuse providing the Services to the Domain name holder.
12. The Domain name holder’s personal data is stored in the Registry database until the expiration date of the domain name registered in the Registry database (hereinafter referred to as “**Preservation period**”), which is one year before the expiration of the domain name use period and the additional preservation period of the domain name (hereinafter referred to as “**Additional period**”) in the Registry database, which is 45 days.
13. In case of annulment of domain name registration (renewal) on the basis defined in the General Terms and Conditions of the Website, the given domain name and the personal data of that Domain name holder is removed prematurely from the Registry database (Preservation period is terminated).
14. In case of domain names registration in the Registry database is carried out by the Registrar, Registrar does not carry responsibility for those registrations, as well as the authenticity of data

presented by the Domain name holder and is not obliged to verify the authenticity of those data.

III. Processing of Personal Data About the Domain Name Holder and Website Visitors

15. We can also obtain:

- 15.1. information about the details of visits to our site and Internet messages,
- 15.2. technical information on how the customer uses our Services, in particular, what device and browser is used to enter our sites,
- 15.3. details of payment information and transactions initiated through the website, including Your payments.
- 15.4. communication with us or our employee, such as calls, letters.
- 15.5. Your location information, including the IP address, as well as information about the movement.
- 15.6. any additional information that you will provide us with through our websites (information collected by “Cookies”, “Web beacons” tools). For more information, please read our policy on “Cookies and other technologies” in the section XI.
- 15.7. we may also request a photocopy of the identity document, a photo of the customer in which the customer's face should be visible, and a page of the passport (or identification card) containing the picture in some cases proof of address.

IV. The Lawful Basis for the Processing of Data

16. The processor of personal data shall be obliged to follow and ensure that the data is processed in observance of the requirements of the law of Republic of Armenia.
17. Personal data shall be processed for legitimate and specified purposes and may not be used for secondary purposes without the data subject's consent.
18. The processing of your personal data is lawful, if;
 - 18.1. the data have been processed in observance of the requirements of the legislation of RA and the data subject has given his/her/its consent, except for cases directly provided for by legislation of RA; or
 - 18.2. the data being processed have been obtained from publicly available sources of personal data

V. Personal Data Confidentiality and Security Measures for Processing Personal Data

19. Information relating to personal data that has become known to LLC is considered as confidential and is protected by law.
20. In order to protect your personal data, the LLC provides sufficient technical and organizational measures of safeguard: in particular;
 - 20.1. To protect your personal information, we take reasonable precautions and follow industry best practices against accidental loss, unauthorized access to information systems, unlawful use, recording, destructing, altering, blocking, copying, disseminating personal data and other interference. We store all of the personal information that we receive directly from you in an encrypted and password-protected database. The database, in turn, resides within our secure network.
 - 20.2. Our personnel and other persons who have access to the processed personal data have signed a non-disclosure agreement, as well as are warned of possible disciplinary,

administrative, civil, and criminal liability in the event of a violation of the norms and requirements of the applicable laws relating to personal data processing.

VI. The Purpose of Processing Other Personal Data

21. We use your personal data for the following purposes:
 - 21.1. to provide and maintain our Services;
 - 21.2. to notify you about changes of our Services;
 - 21.3. to ensure the functionality of Your account,
 - 21.4. to comply with our legal and regulatory obligations;
 - 21.5. to process your online financial transactions;
 - 21.6. to provide customer support;
 - 21.7. to do analysis or gather valuable information so that we can improve our Services;
 - 21.8. to monitor the usage of our Service;
 - 21.9. to detect, prevent and address technical issues;
 - 21.10. to provide and improve the proper functionality of the Website,
 - 21.11. to provide you with news, special offers, and general information about other goods, services and events, unless you have opted not to receive such information.

VII. Transfer of Personal Data of the Domain Name Holder and Website Visitors to Third Parties

22. We may use the services of certain trusted third-party companies in connection with the provision of the Services. In particular, they ensure the operation of our Website, the provision of banking and payment services, identity verification and risk management. In connection with the latter, we may be required to share some of your information with these companies. Moreover, some of which may be based outside of our country of residence to be able to offer our Services to you.
23. Based on the requirements imposed by state bodies and local authorities in the cases and procedures provided for by law, as well as on our legal obligations, your data may be transferred to these bodies or authorities.
24. In case of change of the owner of the LLC, its reorganization, or another business event, in results of which we will be transferring your personal data to other person, you will be notified via email, or notice will be posted on our Website, to explain the identity of the new data processor and Your options regarding Your personal data.
25. Our site may contain links to and from the websites of third party organizations. Please note that these websites may have their own privacy policies and that LLC do not take any responsibility whatsoever for these policies. Please check these policies carefully before submitting any personal data.

VIII. Disclosure of Personal Data

26. Your personal data may be disclosed in the case when it is reasonably necessary:
 - 26.1. to comply with a legal obligation;
 - 26.2. to protect and defend the rights and property of LLC;
 - 26.3. to prevent or investigate possible wrongdoing in connection with the Service;
 - 26.4. to protect the personal safety of the users of Services, Website visitors or the public;
 - 26.5. to protect against legal liability;
 - 26.6. in case of your agreement, for other purposes as well.

IX. Storage of Personal Data

27. LLC is incorporated in the Republic of Armenia and your data is stored regarding to the legislation of RA.
28. Due to the fact of working with the third parties, the data we collect from You may be transferred to, and stored at, a destination outside of the territory of the RA. It may also be processed by the personnel operating outside the RA who work for us or for one of our suppliers. Such personnel may be engaged in, among other things, customer services, the processing of your payment details and risk management.
29. We ensure there are appropriate contractual safeguards over any third party that helps us process your personal data. Thus, your rights and the confidentiality of Your personal data are guaranteed.
30. In the event of termination of the Services in the cases provided in the General Terms and Conditions of the Website, Your personal data will be stored in our systems and processed until it is fulfilled to the extent period set with Your consent, that it is objectively necessary to fulfill the purposes provided for in the data processing according to the policies published in the Website, or to fulfill our legal obligations, resolve disputes and apply our legal agreements.

X. Your Rights

31. Your main rights are:
 - 31.1. to recall previously given consent, but this may not result in the invalidity of the previously agreed processing,
 - 31.2. to access your personal data which we process,
 - 31.3. to require correction of personal data that is incorrect or out of date,
 - 31.4. to demand the destruction of any personal data which we have processed, if that personal data is incomplete or inaccurate or outdated, and unless otherwise provided by applicable law;
 - 31.5. to apply for obtaining or providing some of your personal information to You or to Your chosen company;
 - 31.6. to make an objection on the processing of data when that processing is performed by us in our legitimate interest;
 - 31.7. to dispute the decision made through automated processing, to express your opinion, and to demand its revision;
 - 31.8. to file a complaint with the relevant data protection bodies.
32. These rights are not absolute. They are subject to the relevant legal regulations.
33. To get more information about Your rights, please contact us via info@menqconsulting.am.

XI. Policy on the Usage of Cookies and Other Technologies

34. Cookies are text files containing a small amount of information that are downloaded into your device when you visit a website. They are generally used by most websites to improve your online experience and to ensure that content and functions are delivered and used more effectively.
35. Cookies perform various functions. For instance, some cookies are downloaded into Your device temporarily for the period that you browse our Website. The session cookies, allow you to navigate between pages more efficiently or enable websites to remember the preferences

you select. Persistent cookies, are used to help websites remember you as a returning visitor or ensure the online adverts You receive to be more relevant to Your specific needs and interests.

36. The primary purpose of using cookies on our Website, either directly by ourselves or our chosen partner(s), is to: enable you to save time and facilitate future access to the Website; identify how people navigate through our Website to improve our Service, content and the effectiveness of our communications and for other similar purposes.
37. Using our Services, You agree that LLC may, from time to time, place cookies on Your device to save information (such as user name, other personal details, e-mail address, technical device information such as the model and its IP address) to make full use of the functionality and Services on our Website and to allow Your browser to identify You as a user. This enables You to not have to re-enter this information each time you visit our Website. These cookies cannot be used to run programs or deliver viruses to Your computer, and are uniquely assigned to You. These cookies can only be read by the web server(s) that placed the cookies on Your device.
38. At any time, You can alter Your browser's settings to block some or all our cookies. However, if You block our cookies some or all the Website's functions may not perform as intended. For example, You may not actually be able to place any bets.
39. For further information about cookies can be found at: www.allaboutcookies.org.
40. LLC may also use web beacons alone or in conjunction with cookies to compile information about usage of our Website and interaction with emails from LLC (e.g., open rates, click through rates). Web beacons are clear electronic images that can recognize certain types of information on Your device, such as cookies, when You viewed a particular website tied to the web beacon, and a description of a website tied to the web beacon. For example, we may place web beacons in marketing emails that notify us when You click on a link in the email that directs You to our Website. LLC may use web beacons to operate and improve our Website and email communications.

XII. Making Changes in This Policy

41. LLC is authorized to make changes in the Privacy Policy. You can get acquainted with the changed content of the policy on our Website, which is constantly updated.
42. In the case of making essential changes in the Privacy Policy, we will notify You. In other cases, the changes to the Privacy Policy enter into force on the date specified in the "Updated" date. After the change of the date, the continuous use of Services by You will be considered as consent and acceptance of its conditions.

Updated on April 20 2021y.

In case of any discrepancies between the Armenian language version of the Privacy Policy and the other language versions, the Armenian language version shall prevail.