PRIVACY POLICY

Tashkent April 1, 2025

1. General Provisions

1.1. This Privacy Policy (hereinafter referred to as the "Policy") outlines the procedures for collecting, using, storing, processing, and protecting the personal data of users of the website https://crc.uz (the "Website"), which is operated by the Joint Venture "BOBUR DIYOR" (the "Company").

1.2. The Policy has been developed in accordance with the Law of the Republic of Uzbekistan "On Personal Data" and other applicable legal and regulatory acts governing the processing and protection of personal information.

1.3. By using the Website, the user agrees to the terms of this Policy and the procedures for processing their personal data as described herein.

1.4. If the user does not agree with the terms of this Policy, they must discontinue using the Website.

1.5. This Policy applies to all information that the Company may receive about the user during their use of the Website, including but not limited to: submitting a car rental request, registering a personal account, subscribing to a newsletter, or using any other functions of the Website.

1.6. The Company reserves the right to amend this Policy. The updated version will be published on the Website with the date of the latest revision clearly indicated.

1.7. The personal data operator is: Family enterprise "BOBUR DIYOR"
Legal address: Republic of Uzbekistan, Tashkent, Mirabad District, Saykhun Street, 170A
Taxpayer Identification Number: 304 719 294
Email: business@crc.uz
Phone: +998 99 910 03 00

2. Types and Categories of Personal Data Collected

2.1. In the course of using the Website and/or booking vehicle rental services, the Company may collect and process the following categories of personal data from users:

A. Identification Data
– Full name (surname, first name, patronymic)
– Passport details (if a rental agreement is concluded)
– Driver’s license number and its expiration date

B. Contact Details
– Mobile phone number
– Email address

C. Service-Related Data
– Date and time of booking
– Vehicle pickup and return locations

– Selected rate plan and type of vehicle
– Additional requests (child seat, insurance, etc.)

D. Payment and Financial Data
– Card type and number (processed via payment service provider)
– Payment amounts, dates, and statuses
– Records of payments, refunds, and security deposit transactions

Note: Payment data is processed by external providers. The Company does not store payment credentials on its servers.

E. Technical and Behavioral Data
– IP address, device type, and browser
– Operating system and interface language
– Cookie and session data
– Website activity (pages visited, transitions, forms, etc.)

Some of this data is collected via analytics tools such as Google Analytics to assess user behavior and improve website performance.

F. CRM and Digital Channel Data
– Interaction history (requests, orders, statuses)
– Notes and comments from managers
– Call recordings with the call center
– Chatbot and messenger correspondence
– Auto-responder outcomes and voice message handling
– Timestamp and content of user communications

This data is managed via the KPI.COM CRM system and integrated customer service tools.

G. Geolocation Data
– User location, if permitted by browser or device settings
– Location data related to booking (pickup and return points)

H. Other Information
– Messages sent through contact forms
– Complaints, suggestions, and service ratings
– User reviews, comments, and any other voluntarily submitted information

2.2. All personal data is collected strictly to the extent necessary to fulfill service obligations, provide high-quality customer support, and comply with applicable legal requirements.

2.3. The Company does not collect or process special categories of personal data (e.g., biometric data, health status, religious beliefs), except as required by law.

3. Methods and Sources of Personal Data Collection

3.1. Personal data is collected through the following means:

A. Directly Provided by the User
Personal data is voluntarily submitted by the user when:
– Filling out vehicle booking forms on the Website

– Registering a personal account
– Submitting inquiries via feedback forms
– Communicating with call center operators
– Corresponding via chatbots or messengers
– Signing rental agreements either in person or online
– Providing identity documents

3.2. Data submission may be either mandatory (for rental agreement execution) or optional (e.g., for leaving a review or subscribing to newsletters).

B. Automatically Collected During Website Use
Technical and behavioral data is gathered automatically through:
– Cookies and similar technologies (e.g., session storage, local storage)
– Web analytics services, including Google Analytics
– Web server and activity log files

Such data may include IP address, device type, browser characteristics, interface language, on-site behavior, session duration, and other metadata.

3.3. When using mobile devices, geolocation data may also be collected with the user's permission.

C. Integration with External Services
The Company may receive and process data through the following internal and external systems:
– **CRM System (KPI.COM):** order history, customer interactions, call recordings, internal communication
– **Payment Providers:** information about transactions
– **IP Telephony and Call Center:** call audio, time and duration logs
– **Chatbots and Messaging Platforms (e.g., Telegram, WhatsApp):** conversation history and user identifiers

3.4. All data sources are used strictly for the purposes outlined in this Policy and within the scope permitted by the legislation of the Republic of Uzbekistan.

4. Purposes of Personal Data Processing

4.1. The processing of users' personal data is carried out solely for the following purposes:

A. Provision of Car Rental Services
– Receiving and handling rental requests
– Entering into, executing, and managing rental agreements
– Ensuring timely vehicle delivery and return
– Sending notifications regarding order status, rental terms, and other relevant details

B. Customer Support and Communication
– Providing guidance and customer assistance
– Responding to inquiries, complaints, and suggestions
– Sending important notifications (e.g., booking confirmations, reminders, alerts)

C. Legal and Regulatory Compliance
– Ensuring compliance with the legislation of the Republic of Uzbekistan

– Responding to official requests from authorized government bodies
– Conducting KYC (Know Your Customer) procedures and fraud prevention measures

D. Marketing Activities (with user consent)
– Distributing promotional and informational materials
– Offering personalized discounts, services, and special deals
– Conducting surveys and collecting feedback to improve service quality

E. Internal Analytics and Service Optimization
– Analyzing user behavior on the Website
– Assessing the performance of communication channels and CRM systems
– Optimizing user interfaces, booking flows, and internal processes

F. Ensuring Information and Technical Security
– Detecting and preventing unauthorized access
– Maintaining stable and secure operation of the Website and internal systems
– Combating fraud and abuse

G. Automated Customer Scoring
– Assessing customer reliability based on interaction history, behavior profiles, contact details, and other available data
– Making preliminary decisions regarding rental terms, deposit requirements, or service denial in high-risk cases
– Using internal risk control algorithms and anti-fraud filters to minimize financial and reputational threats

Note: Automated processing is not used to make legally binding decisions without human involvement.

5. Legal Grounds for Personal Data Processing

5.1. The processing of users' personal data is carried out in accordance with the legislation of the Republic of Uzbekistan, including but not limited to the Law "On Personal Data", the Civil Code, and other applicable regulatory acts.

5.2. The Company processes personal data based on the following legal grounds:

A. User Consent
The user voluntarily provides consent to the processing of their personal data when filling out forms on the Website, during phone communication, or in the course of placing an order. Consent may be withdrawn at any time by sending a request using the contact details provided.

B. Necessity for Contract Performance
Data processing is required for the conclusion and performance of car rental agreements, including actions taken prior to the agreement such as submitting a request, communicating about the order, verifying information, calculating pricing, and vehicle handover.

C. Legal Compliance
Processing is performed to fulfill legal obligations, including accounting, taxation, statistical reporting, and other regulatory requirements.

D. Legitimate Interests of the Company
The Company has a legitimate interest in processing personal data to ensure the proper functioning of the Website, prevent fraudulent activity, maintain security, defend against legal claims, and improve the quality of services.

E. Automated Decision-Making Processes
In cases of automated customer scoring, the Company relies on its legitimate interest in securing transactions and evaluating risk prior to contract conclusion.

5.3. If processing is based on consent, the Company undertakes to request it in a clear and transparent manner, with the possibility for the user to withdraw it at any time.

6. Data Retention Periods

6.1. The Company retains users' personal data only for as long as necessary to fulfill the purposes described in this Policy and in accordance with the legislation of the Republic of Uzbekistan.

6.2. Retention periods are determined based on the following criteria:

A. Contractual Obligations
Personal data is stored for the duration of the car rental agreement and for up to **five (5) years** thereafter, to address potential claims, resolve disputes, and meet legal and tax reporting obligations.

B. Marketing and Analytical Purposes
Data used for marketing or analytics is stored for no more than **three (3) years** from the user's last interaction, unless the user withdraws their consent earlier.

C. Security and Fraud Prevention
Data collected for automated scoring, monitoring, and anti-fraud measures may be retained for up to **five (5) years**, based on the Company's legitimate interest in preventing losses and protecting its business reputation.

D. Legal Compliance
Certain data may be retained for the legally required period to comply with financial, archival, and regulatory obligations (e.g., **a minimum of 5 years** for data related to accounting and taxation).

6.3. Upon expiration of the applicable retention period, personal data is subject to deletion, anonymization, or archiving in line with the Company's internal policies and regulatory requirements.

6.4. Users have the right to request the deletion of their personal data before the expiration of the above periods, provided such deletion does not conflict with the Company's legal obligations (e.g., under a contract or for reporting purposes).

7. Conditions for Disclosure and Transfer of Personal Data to Third Parties

7.1. The Company undertakes not to transfer or disclose users' personal data to third parties without prior consent, except in cases provided for by this Policy and the laws of the Republic of Uzbekistan.

7.2. Disclosure of personal data may be permitted under the following circumstances and to the following categories of recipients:

A. Partners and Contractors
Drivers, logistics providers, and technical partners involved in the delivery of rental services.

B. Payment Systems and Banks
For processing transactions, refunds, payment confirmations, and fraud prevention.

C. IT Providers and Platform Services
– Hosting and cloud service providers
– Website developers and technical support teams
– The KPI.COM CRM system, including its infrastructure
– Web analytics services (e.g., Google Analytics)

D. Communication Services
Call centers, chatbots, automated responders, and IP telephony operators.

E. Government Authorities
Authorized public bodies entitled to request data under applicable laws.

F. Legal Successors
In the event of a business transfer, provided the terms of this Policy are upheld.

G. Cross-Border Data Transfer
7.4. Cross-border transfers of personal data are conducted solely as needed for the operation of the KPI.COM CRM system, which is hosted on Amazon Web Services (AWS) servers located in the United States.

The Company ensures that adequate data protection measures are in place, in line with international standards. These include legal, organizational, and technical safeguards to maintain data confidentiality and integrity.

7.3. All third-party recipients are required to use personal data strictly for its intended purpose and to ensure confidentiality through binding contractual obligations.

8. User Rights Regarding Personal Data

8.1. Users whose personal data is processed by the Company have the right to exercise the following rights, in accordance with applicable laws:

A. Right of Access
To obtain information on whether their personal data is being processed, as well as details on the purposes, scope, storage duration, and any third-party recipients.

B. Right to Rectification
To request correction or updating of outdated, inaccurate, or incomplete personal data.

C. Right to Withdraw Consent
To revoke previously granted consent for personal data processing. Upon withdrawal, the Company will cease processing unless it is legally required or necessary for contract fulfillment.

D. Right to Restrict Processing

To request a temporary suspension of data processing (e.g., during a dispute about data accuracy) until the issue is resolved.

E. Right to Erasure ("Right to be Forgotten")

To request deletion of personal data in the following cases:
– When data is no longer needed for processing
– Upon withdrawal of consent
– In case of unlawful processing
– After the retention period has expired

F. Right to Object to Processing

To express objection to data processing based on the Company's legitimate interests (e.g., for marketing purposes).

G. Right to Data Portability (where applicable)

To receive a copy of the data in a machine-readable format and transfer it to another data controller (subject to technical and legal feasibility).

H. Right to an Explanation of Automated Decisions

To receive clarification on the logic behind any automated data processing (e.g., rental denial based on risk scoring) and to request a human review of such decisions.

8.2. These rights can be exercised by submitting a formal request to the Company via the following contact details:

📩 **Email:** info@crc.uz
📍 **Postal address:** Republic of Uzbekistan, Tashkent, Mirabad District, Saykhun Street, 170A
📞 **Phone:** +998 99 910 03 00

8.3. The Company will respond to user requests within a reasonable period as required by law (generally no more than 30 calendar days from the date of receipt).

8.4. To verify identity, the Company may request additional information from the requester as necessary.

9. Personal Data Protection Measures

9.1. The Company takes all necessary legal, organizational, and technical measures to ensure the confidentiality, integrity, and security of users' personal data.

A. Organizational Measures

– Appointment of a designated person or department responsible for data protection
– Internal data access control: only authorized personnel have access based on a "need-to-know" principle
– Staff training and internal instruction on data security
– Access logging and monitoring of employee actions within the CRM system
– Oversight of contractors and partners to ensure confidentiality compliance

B. Technical Measures

– Use of up-to-date information security tools such as firewalls, antivirus software, and anti-bot systems

– Encryption of transmitted data via HTTPS / SSL protocols
– Authentication of users and staff through passwords, tokens, and other secure methods
– Automatic activity logging within CRM and hosting systems
– Regular data backups

C. Legal Measures
– Signing non-disclosure and confidentiality agreements with employees, contractors, and partners
– Inclusion of data protection clauses in contractual agreements
– Auditing compliance with personal data legislation

D. Cross-Border Protection
The KPI.COM CRM system, hosted on Amazon Web Services (AWS) servers in the United States, uses internationally recognized information security standards, including:
– Data encryption
– Access control
– Intrusion detection and prevention systems (IDS/IPS)
– Physical protection of data centers

9.2. Despite all protective efforts, the Company cannot guarantee absolute security in cases involving factors beyond its control (e.g., cyberattacks, internet outages, or hosting failures). However, it undertakes all reasonable measures to minimize such risks and their consequences.

10. Use of Cookies and Similar Technologies

10.1. To ensure proper functionality of the Website, improve user experience, analyze behavior, and enhance marketing effectiveness, the Company uses cookies and related technologies (including session storage, local storage, pixels, and tracking tags).

A. What Are Cookies
Cookies are small text files stored on the user's device that allow the Website to recognize their browser, retain preferences, and collect technical and behavioral data.

B. Types of Cookies Used on the Website
– **Functional:** Enable core Website features (navigation, login, language preferences, etc.)
– **Analytical:** Collect usage statistics for optimization (e.g., via Google Analytics)
– **Marketing:** Deliver personalized offers, enable retargeting, and measure ad performance
– **Session and Persistent:** Differ in storage duration

C. Third-Party Cookies
The Website may use cookies from third-party systems, such as:
– Google Analytics — for user behavior analysis
– CRM KPI.COM — when integrated components are in use
– Other digital tools used within the Company's infrastructure

D. Cookie Consent Banner
When first visiting the Website, users are presented with a cookie consent banner. In it, users can:
– Review cookie categories
– Accept all cookies

– Select specific categories (e.g., only functional)
– Reject non-essential cookies

Consent remains valid until revoked or changed by the user.

E. Cookie Management
Users can change or withdraw consent at any time through:
– Cookie settings on the Website (if available)
– Their web browser settings

Limiting or disabling cookies may affect the proper functioning of some Website features.

11. Processing of Personal Data of Minors

11.1. The services provided via crc.uz are intended exclusively for individuals aged 18 and over.

11.2. The Company does not knowingly collect or process personal data of minors, nor does it enter into rental agreements with individuals below the legal age set by Uzbek law.

11.3. To enforce this restriction, the booking forms include technical age verification measures, such as:
– Date of birth entry
– Driver's license validation
– Age-based request filtering

11.4. If personal data is submitted by a minor without the knowledge and consent of a legal representative, such data will be deleted upon request from a parent, guardian, or authorized government authority.

11.5. Requests may be submitted via:

📩 **Email:** info@crc.uz
📍 **Postal Address:** Republic of Uzbekistan, Tashkent, Saykhun Street, 170A
📞 **Phone:** +998 99 910 03 00

12. Changes and Updates to the Privacy Policy

12.1. The Company reserves the right to amend or update this Privacy Policy at any time without prior notice, including in response to changes in legislation, technology, or internal processes.

12.2. The current version of the Policy is always available on the official Website at: https://crc.uz/privacy (or another valid link where the document is published).

12.3. The date of the latest update is indicated at the top of the document. Users are advised to review the Policy periodically to stay informed about how their data is handled.

12.4. In case of significant changes affecting users' rights or interests (e.g., change of processing purposes, types of collected data, or third-party disclosure), the Company may notify users via:
– A banner or notice on the Website
– Email, if it was provided during registration or booking

12.5. Continued use of the Website after an updated Policy is published constitutes the user's acceptance of the new terms.