

PRIVACY POLICY

Effective date: 19 January 2026

Operator: X2 Limited Liability Company (LLC "X2")

Website: <https://x2.kg>

1. General Provisions

This Privacy Policy (hereinafter referred to as the "**Policy**") defines the procedure for processing personal data of users of the **X2.KG website and mobile services**, operated by the lottery operator **X2 Limited Liability Company (LLC "X2")** (hereinafter referred to as the "**Operator**").

The Policy regulates the processes of **collection, storage, use, and protection of personal data** in accordance with:

- the Law of the Kyrgyz Republic "**On Personal Data Information**" dated 14 April 2008 No. 58;
- the Law of the Kyrgyz Republic "**On Lotteries**" dated 21 December 2023 No. 214;
- the Law of the Kyrgyz Republic "**On Counteracting the Legalization (Laundering) of Criminal Proceeds and the Financing of Terrorist Activities**" dated 31 July 2018 No. 87;
- the Law of the Kyrgyz Republic "**On the Payment System of the Kyrgyz Republic**" dated 21 January 2015 No. 21;
- internal regulations and information security policies of the Operator.

By using the services of the **X2.KG website**, you confirm that you have read this Policy and **agree to its terms**.

Personal Data Controller

X2 Limited Liability Company (LLC "X2")

Legal address:

22 Razzakova Street, Bishkek, Kyrgyz Republic

Contact email for privacy requests:

privacy@x2.kg

2. What Data We Collect

We collect personal data **strictly to the extent necessary** to provide lottery participation services, comply with legal requirements, ensure security, and provide reporting to regulatory authorities.

2.1 Data You Provide Directly

When registering, purchasing tickets, participating in draws, or contacting support, a user may provide:

- full name (surname, name, patronymic);
- date of birth (for verification of the 18+ age requirement);
- phone number;
- email address;
- account information;

- payment details for receiving winnings;
- messages sent to customer support.

This data is used for:

- user identification;
 - account protection;
 - compliance with age restrictions (18+);
 - ensuring payment of winnings;
 - fraud prevention.
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2.2 Data Collected Automatically

When using the website, certain **technical data** is automatically recorded, including:

- IP address;
 - approximate geolocation based on IP;
 - device information;
 - browser type;
 - operating system information;
 - connection parameters;
 - technical logs and error logs;
 - visit history;
 - behavioral data used for anti-fraud purposes.
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2.3 Transactional and Gaming Information

The system records operational information related to gaming activity, including:

- deposit history;
 - withdrawal history;
 - transaction status;
 - internal balance movement history;
 - participation history in lottery games;
 - draw results;
 - winnings credited to the user.
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2.4 Data Related to Participation in Games and Operations

During use of the service, the system generates information about:

- purchased electronic lottery tickets;
- participation in lottery games;
- draw results;
- winnings credited to the user;
- movement of funds within the service.

This information is required for **transparent accounting and correct payment of winnings**.

3. Purposes of Data Processing

We process personal data **exclusively for the following purposes.**

3.1 Provision of X2.KG Website Services

- registration and maintenance of the user account;
 - participation in lottery games;
 - accounting of bets and winnings;
 - payment of winnings;
 - communication with users regarding services;
 - compliance with the legislation of the Kyrgyz Republic;
 - protection of users and services from fraud and abuse;
 - improving the functionality of the website.
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3.2 Ensuring Security

- fraud prevention;
 - access control;
 - monitoring of suspicious activity;
 - prevention of hacking attempts and technical attacks;
 - logging actions of users and administrators;
 - protection of payment transactions.
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3.3 Improving Service Quality

- internal analytics;
 - operation of recommendation algorithms;
 - proper interface display;
 - improvement of website functionality.
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3.4 Marketing Communication (with User Consent)

- notifications about lottery draws and promotions;
- informational newsletters;
- personalized offers.

Users may opt out of marketing communications at any time.

4. Legal Basis for Data Processing

Personal data processing is carried out based on:

- the **consent of the user**;
- the **necessity to perform a contract** to which the user is a party;
- **legal obligations** imposed by the legislation of the Kyrgyz Republic;
- the **legitimate interests of the Operator**, provided that the rights of users are not violated.

5. Cookies and Technical Data

The Operator's website uses **cookies**, which are small technical files that help to:

- maintain user login sessions;
- remember user settings;
- ensure service security;
- analyze website performance;
- improve the user interface.

The use of cookies **does not allow identification of a specific individual without additional information.**

Users may restrict cookies through browser settings; however, some website functions may not operate correctly if cookies are disabled.

6. Transfer of Data to Third Parties

Personal data may be transferred **only in the following cases**:

- to **payment and technical partners** for processing payments and operating the service;
- to **government authorities**, where required by law;
- to **contractors providing technical support and security services.**

In all cases, the transfer of data is carried out **only to the extent necessary.**

7. When Data Is NOT Shared

We do **not** transfer personal data:

- to advertising agencies;
- to third parties for their own marketing purposes;
- to external companies without legal grounds.

8. Data Retention Periods

Data retention periods are determined by the **legislation of the Kyrgyz Republic and processing purposes.**

Typical retention periods include:

- gaming and transaction data — **minimum 5 years**;
- security logs — **minimum 3 years**;
- KYC/AML data — **up to 7 years**;
- accounting records — in accordance with tax legislation;
- account data — during the entire period of service use plus mandatory retention after account closure.

Data is stored in **secure data centers located within the territory of the Kyrgyz Republic.**

After retention periods expire, data is **deleted or anonymized.**

9. Data Protection

We apply a comprehensive set of **security measures**, including:

- secure data transmission channels;
 - system access control;
 - role-based employee access rights;
 - monitoring of suspicious activity;
 - regular data backups;
 - periodic security audits and updates.
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10. User Rights

As a user, you have the right to:

- know which personal data we process;
- correct or update your personal data;
- withdraw consent to marketing communications;
- submit requests regarding personal data processing;
- file a complaint with the competent government authority.

User requests are processed **within the time limits established by law**.

11. Limitation of Liability

The Operator shall not be liable for:

- loss of access to an account due to the user's fault;
 - actions of third parties who obtained access to data beyond the Operator's control;
 - failures in communication networks or third-party services;
 - force majeure circumstances;
 - errors or failures of payment providers.
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12. Policy Changes

Any amendments to this Policy shall enter into force **from the moment they are published on the Website**.

The current version of the Policy is always available on the **X2.KG website**.

Continued use of the website constitutes **acceptance of the updated Policy**.