

PERSONAL DATA PROCESSING POLICY

LLC "X2"

Version dated 19 January 2026

1. General Provisions

1.1.

This Personal Data Processing Policy (hereinafter referred to as the "**Policy**") defines the main principles, purposes, conditions and methods of personal data processing, the categories of personal data subjects, the scope of processed personal data, the actions (operations) performed with personal data, as well as the measures taken to ensure their security within **X2 Limited Liability Company (LLC "X2")** (hereinafter referred to as the "**Operator**").

1.2.

This Policy has been developed in accordance with the legislation of the **Kyrgyz Republic**, including but not limited to:

- 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**;
- other regulatory legal acts of the Kyrgyz Republic.

1.3.

This Policy shall be published in **open access on the Operator's official website**:

<https://x2.kg>

2. Principles, Purposes and Legal Grounds for Personal Data Processing

2.1 Principles of Personal Data Processing

The Operator processes personal data on a **lawful and fair basis**, exclusively for the achievement of specific, predetermined and legitimate purposes.

Only personal data that corresponds to the purposes of processing is processed. Such data must not be excessive and must be maintained in an **accurate and up-to-date condition**.

Personal data shall be stored **no longer than required for the purposes of processing**, unless another storage period is established by the legislation of the Kyrgyz Republic.

Upon achieving the purposes of processing or if such purposes are no longer necessary, personal data shall be **destroyed or anonymized**, unless otherwise provided by law.

2.2 Purposes of Personal Data Processing

Personal data is processed by the Operator for the following purposes:

- registration and identification of Website users;
 - provision of Website services and performance of contracts with personal data subjects;
 - accounting for participation in lottery games, bets and winnings;
 - payment of winnings;
 - informational communication with users;
 - compliance with the requirements of the legislation of the Kyrgyz Republic;
 - exercising the Operator's rights and legitimate interests, provided that the rights and freedoms of personal data subjects are not violated;
 - prevention of unlawful actions and ensuring the security of services.
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2.3 Legal Grounds for Personal Data Processing

Personal data processing is carried out on the basis of:

- the consent of the personal data subject;
 - the necessity to perform a contract to which the personal data subject is a party;
 - the necessity to fulfill obligations imposed on the Operator by the legislation of the Kyrgyz Republic;
 - the necessity to protect the legitimate interests of the Operator, provided that the rights of personal data subjects are respected.
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3. Categories of Personal Data Subjects, Scope of Data and Processing Actions

3.1 Categories of Personal Data Subjects

The Operator processes personal data of the following categories of persons:

- Website users and participants of lottery games;
 - individuals who have contacted the Operator with requests or inquiries;
 - counterparties who are individuals or individual entrepreneurs;
 - representatives of counterparties that are legal entities;
 - employees of the Operator and candidates applying for employment;
 - other persons interacting with the Operator within the framework of lawful processing purposes.
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3.2 Scope of Processed Personal Data

The scope of personal data depends on the purposes of processing and may include:

- surname, name and patronymic;
- date of birth;
- telephone number;
- email address;
- user account identifiers;
- information about participation in lottery games and operations performed on the Website;
- other data voluntarily provided by the personal data subject.

The Operator does **not process special categories of personal data**, unless such processing is directly required by the legislation of the Kyrgyz Republic.

3.3 Actions with Personal Data and Use of Cookies

Personal data processing may be carried out **with or without the use of automated means**, including the following actions:

- collection;
- recording;
- systematization;
- accumulation;
- storage;
- clarification (updating, modification);
- use;
- transfer;
- anonymization;
- blocking;
- destruction of personal data.

The Website uses **cookies** in order to:

- ensure proper functioning of the Website;
 - improve the quality of user services;
 - perform analytics;
 - ensure the security of services.
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4. Rights of Personal Data Subjects

A personal data subject has the right to:

- obtain information regarding the processing of their personal data;
 - request clarification, blocking or destruction of personal data;
 - withdraw consent for personal data processing;
 - appeal against actions or inaction of the Operator to authorized authorities or courts;
 - exercise other rights provided by the legislation of the Kyrgyz Republic.
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5. Ensuring Personal Data Security

The Operator takes the necessary **legal, organizational and technical measures** to protect personal data against unlawful or accidental access, destruction, modification, blocking, copying, distribution, or other unlawful actions.

Such measures include, but are not limited to:

- appointment of responsible persons;
 - internal monitoring and compliance control;
 - restriction of access to personal data;
 - use of information security tools;
 - employee training and awareness.
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6. Final Provisions

This Policy shall remain valid **indefinitely until replaced by a new version**.

The Operator has the right to amend this Policy.

A new version shall enter into force **from the moment it is published on the Website.**