

PERSONAL DATA PROCESSING POLICY

WALL STREET ACADEMY Limited Liability Company

Version of 28 August 2026

1. General provisions

1.1. This Policy sets out how personal data is processed and protected at WALL STREET ACADEMY LLC (hereinafter — the Centre, the Operator) and explains what information about a person the Centre collects, for what purpose, to whom it is transferred, how long it is kept, and what rights the person whose data is processed has.

1.2. The Policy has been drawn up in accordance with the Law of the Republic of Uzbekistan “On Personal Data” No. ZRU-547 of 2 July 2019 (as amended by Law No. ZRU-1125 of 26 March 2026) and other legal acts of the Republic of Uzbekistan.

1.3. Operator details:

Full name: WALL STREET ACADEMY Limited Liability Company

Taxpayer ID (INN): 306116238

Address: 100178, Tashkent, Almazar district, Malaya Koltsevaya Doroga 72-A (2nd floor)

Telephone: +998-78-888-77-70

Website: wsa-status.uz

Licence (Tasdiqnom): No. 1372072 of 11 February 2026

1.4. The Centre’s personal data database is entered in the State Register of Personal Data Databases of the Republic of Uzbekistan.

1.5. This Policy applies to all personal data processed by the Centre: data on students and their legal representatives, on website visitors, on persons requesting a consultation, on job applicants, and on employees of the Centre.

1.6. This Policy is a public document and is published on the website wsa-status.uz.

2. Definitions

2.1. Personal data — information recorded on an electronic, paper and (or) other tangible medium that relates to a particular natural person or makes it possible to identify that person.

2.2. Data subject — the natural person to whom the personal data relates. In this Policy this means a student, their parent or other legal representative, a website visitor, a job applicant, or an employee of the Centre.

2.3. Processing of personal data — carrying out one or a combination of actions involving the collection, systematisation, storage, alteration, supplementation, use, provision, dissemination, transfer, depersonalisation and destruction of personal data.

2.4. Operator — WALL STREET ACADEMY LLC.

3. What data the Centre collects

The Centre collects only the information required to provide educational services and to comply with statutory requirements. Everything collected is listed below, grouped by category of person.

3.1. Website visitors who submit an enquiry

name;
telephone number;
the chosen course, and preferred day and time of classes (if stated);
the language of the page from which the enquiry was sent;
IP address and the date the enquiry was sent — stored automatically as protection against bulk submissions by bots.

3.2. Students

surname, first name, patronymic;
date of birth;
telephone number and, where available, email address;
language proficiency level, results of the entrance and interim tests;
attendance records and reasons for absence;
marks, completed homework and teacher's comments;
information on tuition payments and outstanding balance;
photograph (if provided) — for the student's record in the Centre's system;
copies of documents (birth certificate, passport, certificates) — where provided for enrolment or to confirm proficiency level.

3.3. Parents and other legal representatives

surname, first name, patronymic;
telephone number;
Telegram user identifier — if the parent uses the Centre's application for parents;
information on the family relationship to the student.

3.4. Job applicants

surname, first name, patronymic;
telephone number;
information on education and work experience submitted by the applicant;
other information provided voluntarily in the application.

3.5. All website visitors

No tracking cookies are written to the visitor's device when the site is opened, and the Centre does not use advertising analytics systems. When a page loads, fonts are requested from the Google Fonts service, as a result of which the visitor's IP address becomes known to Google. This can be disabled through browser settings; doing so does not affect how the site works.

3.6. The Centre **does not use** biometric identification systems: facial recognition, fingerprint scanning or voice identification. A student's photograph, where provided, is used solely as an image in their record and does not serve to identify a person automatically.

3.7. The Centre **does not collect** genetic data or information on health, ethnicity, religion, political views or criminal record. Should such information be communicated to the Centre at the person's own initiative, it is not entered into the system and is destroyed.

4. Why the Centre processes data

4.1. Purposes of processing:

conclusion and performance of the contract for educational services (public offer) — enrolment, formation of groups, keeping the register, calculating payments;
teaching and quality control — checking homework, testing, tracking progress;
informing parents about performance, attendance and payments — through the Centre's application and in correspondence with an administrator;
handling enquiries and applications from the website — consultation, booking a trial lesson, level assessment;
processing payments and refunds, keeping accounting records;
recruitment — reviewing applications for vacancies;
discharging the obligations imposed on the Centre by law, including tax and licensing legislation.

4.2. The Centre does not use personal data for purposes other than those listed in clause 4.1 and does not take decisions producing legal effects solely on the basis of automated processing.

5. The legal basis for processing

5.1. Processing is carried out on one of the following grounds:

consent of the data subject — when submitting an enquiry from the website, when applying for a vacancy, and when using the application for parents;

performance of a contract to which the data subject is a party — the contract for educational services;

compliance with obligations laid down by law — tax and accounting reporting, requirements of the licensing authorities.

5.2. By submitting an enquiry through the website, a person confirms consent to the processing of the data they have provided for the purposes listed in clause 4.1. Consent is given by a separate action — ticking a box in the form — and is not deemed to have been given by default.

6. Data of minors

6.1. Most of the Centre's students are minors. Their personal data is processed with the consent of a parent or other legal representative, given upon conclusion of the contract for educational services.

6.2. A parent may at any time find out what information about their child is held by the Centre and request its correction or deletion under the procedure set out in section 10 of this Policy.

6.3. The Centre's application for parents shows information about a child's performance, attendance and payments only to the parent linked to that student in the Centre's system.

7. To whom the Centre transfers data

7.1. The Centre does not sell personal data, does not transfer it for advertising purposes and does not disclose it to third parties, except in the cases listed below.

7.2. Data is transferred in the following cases:

1. **To payment organisations** (Payme, Click, the servicing bank) — name, telephone number, amount and purpose of payment. Purpose: accepting tuition payments.
2. **To Telegram Messenger Inc.** — the Telegram user identifier and the text of messages sent through the Centre's application for parents. Purpose: operation of the application and delivery of notifications.
3. **To the amoCRM enquiry management system** — the name, telephone number and content of an enquiry left on the website. Purpose: handling the enquiry and contacting the person who made it.
4. **To state authorities** — information to the extent provided for by law. Purpose: discharging the Centre's statutory obligations.

7.3. Cross-border transfer. The amoCRM service and the Telegram messenger are located outside the Republic of Uzbekistan. When an enquiry is submitted from the website, the name and telephone number of the enquirer are transferred to amoCRM; when the application for parents is used, messages pass through Telegram's servers. Such transfer is carried out only to the extent necessary for the stated purposes and does not extend to information on students' performance, marks, attendance or payments — that data is held only in the Centre's own system.

7.4. Employees of the Centre are granted access only to the information necessary to perform their duties: a teacher sees their own group, an administrator sees the students of their own branch.

7.5. Publication of results. The Centre publishes information about its students' examination results — name, photograph and score achieved — on its website and on social media. Such publication takes place **only with the written consent** of the student or, where the student is a minor, of their parent or other legal representative. Consent is given separately from the contract of study, is voluntary, and a refusal has no effect whatsoever on the terms of study.

7.6. Consent to publication may be withdrawn at any time by applying at a branch of the Centre. The information is removed from the website and from the Centre's social media accounts within five working days of the application. The Centre cannot guarantee the deletion of copies made by third parties before consent was withdrawn.

8. Where and how long data is kept

8.1. Personal data is stored on a server located in the territory of the Republic of Uzbekistan.

8.2. Retention periods:

data on students and parents — for the duration of study and three years thereafter;

payment information and accounting documents — for the period established by accounting legislation;

website enquiries that did not lead to a contract — one year;

job applications — six months, unless the applicant has asked for earlier deletion.

8.3. Upon expiry of the retention period, data is destroyed or depersonalised — brought to a form that does not allow it to be attributed to a specific person.

9. How the Centre protects data

9.1. The Centre takes legal, organisational and technical measures to protect personal data against unlawful access, alteration, dissemination and destruction, including:

access to the Centre's system is granted only to employees who require it for their role and is restricted by role;

logging in is protected by a personal username and password, and employees' actions in the system are recorded;

data exchanged between the user's device and the Centre's server is transmitted over a secure protocol (HTTPS);

the server and the database are not directly reachable from the public network;

backups are made regularly.

9.2. The Centre never asks students or parents for passwords, SMS codes or bank card details, whether by telephone or in correspondence. Any message making such a request in the Centre's name should be treated as fraudulent.

10. Rights of the person whose data is processed

10.1. The data subject has the right to:

know what of their data is processed by the Centre, where it was obtained from and to whom it has been transferred;

request the correction, alteration or supplementation of inaccurate or incomplete data;

request the blocking or destruction of data if it is processed in breach of the law or if the purpose of processing has been achieved;

withdraw consent previously given to processing;

appeal against the Centre's actions to the authorised state body or to a court.

10.2. An application is submitted in person at any branch of the Centre, in writing, on presentation of an identity document. This procedure exists so that information about a student is not disclosed to a stranger claiming to be a parent.

10.3. An application is considered within no more than fifteen working days of its submission.

10.4. Withdrawal of consent to the processing of data necessary for the performance of the contract for educational services makes further study impossible, since without that information the Centre cannot keep the register, calculate payments or admit the student to classes. In that case, study is terminated under the procedure set out in the public offer.

10.5. No information about a student is given by telephone, other than the information a parent can see in the Centre's application.

11. Final provisions

11.1. The Centre may amend this Policy. The version in force is always published on the website wsa-status.uz.

11.2. Matters not governed by this Policy are settled in accordance with the legislation of the Republic of Uzbekistan.

11.3. This Policy is drawn up in Russian, Uzbek and English. In the event of any discrepancy between the texts, the Russian text prevails.

11.4. For questions concerning the processing of personal data, please contact us:

Address: 100178, Tashkent, Almazar district, Malaya Koltsevaya Doroga 72-A (2nd floor)

Telephone: +998-78-888-77-70

Opening hours: daily from 08:30 to 20:30

WALL STREET ACADEMY LLC · INN 306116238

Director General K. Musaev