

**Effective date: 15.04.2025**

## **PRIVACY POLICY**

This Privacy Policy (hereinafter, the “**Privacy Policy**”) applies to the website of “Make It Easy” LLC (hereinafter, the “**Company**,” “**we**,” “**us**,” or “**our**”), available at the <https://washapp.am> web domain (hereinafter, the “**Website**”), and to the mobile application and the car wash services platform offered and operated by us (hereinafter collectively, “**WashApp**”). Through this document, the Company makes the Website and WashApp available to Users in accordance with the Company’s Terms of Use (link: <https://washapp.am/about>) and this Privacy Policy. The definitions used in this Privacy Policy are the same as those provided in the Terms of Use, unless otherwise specified in the Privacy Policy. In order to make the Website and WashApp available, we collect personal data from our Website visitors (hereinafter, “**Website Visitors**”) and our Users. In this Privacy Policy, all references to “**you**” and “**your**” refer to the Website Visitors, the Users, and any individual who accepts the Privacy Policy on behalf of a legal entity User.

This Privacy Policy applies to the personal data collected by the Company when you use our Website and/or WashApp, or otherwise provide personal data to us, including when you contact us. Please read it carefully to understand our policy and how we handle your personal data. If you do not agree with our Privacy Policy, please do not download, register, access, or use the Website and/or WashApp.

### **1. WHO WE ARE**

The Company was established and operates in accordance with the legislation of the Republic of Armenia, with the following corporate information:

“Make It Easy” Limited Liability Company  
Address: Republic of Armenia, Yerevan, Sayat-Nova str. 40, 0025

Under the legislation of the Republic of Armenia, we may organize and/or carry out the processing of personal data and, as such, are considered a personal data processor.

### **2. CHILDREN’S PRIVACY**

Company does not knowingly collect information from children under the age of 18. If you are under the age of 18, please do not submit any personal data to us. We encourage parents and legal guardians to monitor their children’s Internet usage and to help enforce our Privacy Policy by instructing their children never to provide personal data without their permission. If you have reason to believe that a child under the age of 18 has provided personal data to Company through the Website or WashApp, please contact [support@washapp.am](mailto:support@washapp.am) and we will delete that information from our databases.

### **3. CHANGES TO THIS PRIVACY POLICY**

This Privacy Policy was last updated on the date indicated above, but we suggest that you review it from time to time, as our Website and/or WashApp and our business may change. As a result, at times it may be necessary for the Company to make changes to this Privacy Policy. Company reserves the right to update or modify this Privacy Policy from time to time without prior notice. However, if an update may materially impact your rights or how we use your personal information, we will make reasonable efforts to notify you by communication means provided by you before such updates take effect. Your continued use of the Website and/or WashApp after any changes or revisions to this Privacy Policy shall indicate your agreement with the terms of such revised Privacy Policy.

## **4. GENERAL PROVISIONS**

The Company is obligated to protect and maintain the confidentiality of any information related to the personal data of the User.

This Privacy Policy describes the Company's adopted policy for personal data protection, as well as the methods and procedures for processing personal data. The Privacy Policy applies to the Website and WashApp unless a different notification is explicitly provided in writing by the Company.

## **5. INFORMATION WE COLLECT**

What personal information we collect and process depends on how and why you use our Website and/or WashApp. Generally, we process personal information that we receive:

- Directly from you when you provide it to us, such as in connection with our Website and/or WashApp.
- Indirectly, through automated technologies such as cookies, or from third parties.

### **Information We Collect Directly From You**

You can generally visit our Website without having to submit any personal information. If you request more information, or sign up for WashApp, we will collect personal information as follows.

#### *Contact Forms*

If you contact us via the contact form on our Website, we will ask you to provide information (e.g. your name, email address, company name, title).

#### *Account Information*

When an individual registers as a User, we request personal information, such as personal mobile number and if necessary, vehicle license plate number. In the case of legal entities and/or individual entrepreneurs, we may request additional information, such as the name of the legal entity, tax identification number (TIN), etc. Account details are required to identify you as a User and grant access to your account(s). The personal data provided must be accurate, up-to-date, and authentic, and ensuring this is your responsibility. If the User provides any false, inaccurate, or incomplete information, or if the Company has reasonable grounds to doubt the truthfulness, accuracy, or completeness of such information, it may deny the User further access to the WashApp platform and/or refuse to provide the Services.

#### *Customer Payment Information*

In order to process your payment Information, we use third-party payment processors, as explained in the section on Payment Processing below. This information is processed by third-party payment service providers and we receive a confirmation of payment, which we then associate with your Account Information and any relevant transactions.

#### *Optional Information*

We may also receive personal information if you elect to use interactive features of the Website and/or WashApp, including participation in research studies, surveys, promotions, requesting customer support, or otherwise communicating with us.

### **Information We Collect Indirectly**

#### *Device and Usage Information*

When you download, use, or interact with the Website, and or WashApp, even if you do not have an account, we or third parties authorized by us may automatically collect information about your device and usage of the Website and/or WashApp. This data is collected through cookies and similar technologies and includes information about your device, usage of the Website and/or WashApp, visited pages, viewed Services, as well as geolocation data.

#### *Information from Third Parties*

In certain cases, we process personal data received from third parties. Such data may include, for example, transaction data from payment service providers or information that helps us in fraud prevention.

## **6. PAYMENT PROCESSING**

We do not directly collect your payment information and we do not store your payment information. We use third-party payment processors, which collect payment information on our behalf in order to complete transactions. We do not have access to, or process, your credit card information. In case of corporate Customers, if we availed other payment methods, we may request your bank information to process refunds, if any.

## **7. LEGAL BASES FOR PERSONAL DATA PROCESSING**

Your personal data is processed in accordance with the legislation of the Republic of Armenia, including the RA Law on “Protection of Personal Data,” the Terms of Use accepted by you, and this Privacy Policy, which forms an integral part thereof. Below are the main legal bases on which we rely for collecting and using your personal data:

*Performance of a contract:* when your personal information is required in order to enter into or perform our contract with you, such as when you engage us to provide the Website and/or WashApp.

*Consent:* when you have consented to our use of your personal information via a consent form (online or offline).

*Legitimate interests:* when we use your personal information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.

*Legal obligation:* when we must use your personal information to comply with our legal obligations.

*Legal claims:* when your personal information is necessary for us to defend, prosecute or make a claim.

## **8. PURPOSES OF PERSONAL DATA PROCESSING**

Within the framework of the relationship with the Company and the services provided by the Company, your data as outlined in this Privacy Policy may be processed for the following purposes:

- Access to the Website,
- Proper provision of WashApp and Services,
- User support,
- User identity verification and ensuring the accuracy of personal data,
- Sending notifications, informational or advertising (marketing) text or voice messages related to WashApp and Services,
- Collection of anonymized statistical data and conducting other research,
- Other purposes as defined by the legislation of the Republic of Armenia.

## **9. DISCLOSURE OF PERSONAL INFORMATION**

You agree that your personal data may be transferred by the Company both within the Republic of Armenia and to third-party providers located outside the RA who process, store, and provide information. The transfer of personal data outside the RA is carried out in accordance with the requirements of the RA Law on “Protection of Personal Data.”

We may provide (or share) your personal data for the purposes defined in this Privacy Policy and only to the extent justified by these purposes in the following cases:

- To suppliers and service providers involved in delivering the Services or conducting studies related to the Company’s activities, including Partners,
- To the Company’s shareholders, subsidiaries, affiliates, representatives, and branches,
- To third parties who may use personal data (particularly phone numbers) for marketing purposes (e.g., receiving short advertising SMS messages/calls),
- To third parties in connection with mergers, acquisitions, consolidations, splits, or other corporate restructuring transactions,
- To state authorities as defined by RA legislation.

## **10. PERSONAL DATA RETENTION PERIODS**

### *General Retention Periods*

We periodically review personal data retention periods in accordance with the requirements of applicable RA legislation and use the following criteria to determine retention periods:

- - The amount, nature, and sensitivity of your personal data,
- - The reasons for collecting and processing the personal data,
- - The duration of your ongoing relationship with us and the period during which we provide access to our Website and/or WashApp,
- - Applicable legal requirements.

We retain personal data for as long as necessary to make the Website and/or WashApp available. We periodically delete information that is not essential for providing access to the Website and/or WashApp to minimize data retention. We also retain personal data collected from you when we have an ongoing legitimate business need to do so (for example, to comply with applicable legal, tax, or accounting requirements). In such cases, the information will be retained for as long as necessary to meet those potential requirements.

When we no longer have an ongoing legitimate business need to process your personal data, we will either delete or anonymize it (for example, for statistical use). In cases where anonymization is chosen, we ensure that your personal data cannot be linked back to you or any other User in any way. If deletion is not feasible (for example, because your personal data is stored in backup archives), we will securely store your personal data and isolate it from any further processing until deletion becomes possible.

## **11. YOUR RIGHTS**

You have the rights established under the RA Law on “Protection of Personal Data.” You have the right to withdraw your consent for the processing of your personal data or request the deletion of your personal data. However, in such cases, we may no longer be able to provide you with access to the Website and/or

WashApp or continue any contractual relationship with you. Furthermore, the deletion of personal data may not always be possible due to legal requirements, other obligations, or factors. For more details, refer to Section 10.

You can, however, opt out of receiving further promotional information about the services provided by the Company at any time by expressing your refusal in writing or through any other means established by the Company.

You have the right to contact the Company to correct or update your personal data if it is incorrect or needs to be updated. If you believe your personal data has been processed in violation of applicable laws or disagree with the manner of processing, you have the right to file a complaint with the Company. Additionally, you can submit a complaint to the authorized personal data protection body. In Armenia, this is the Personal Data Protection Agency under the Ministry of Justice of the RA.

## **12. SECURITY MEASURES**

We prioritize the security of your personal data and take all reasonable measures to ensure its protection. To safeguard personal data, the Company implements necessary legal, organizational, and technical measures in accordance with RA legislation and the Company's technical capabilities.

Your personal data is accessible only to our employees on a need-to-know basis in order to perform their duties and only to the extent and duration necessary for the purposes defined in this Privacy Policy. Our employees, partners, and other persons with access to processed personal data have signed confidentiality agreements and have been informed of the potential liability under RA law for violations related to personal data processing.

Contracts with all our partners receiving information containing personal data include mandatory provisions prohibiting the disclosure of confidential information (including personal data).

## **13. EFFECTIVE PERIOD OF ACCEPTANCE**

This Privacy Policy and any amendments to it come into effect upon publication on the Company's Website and/or WashApp and apply to relations that arose before the effective date of the Privacy Policy. Previous versions of the Privacy Policy are considered void upon the enforcement of this version.

Acceptance of this Privacy Policy remains effective until the termination of any relationship between you and the Company and the full fulfillment of your obligations to the Company or for a longer period as provided by law.

## **14. CONTACT US**

If you have questions about this Privacy Policy, you can contact us at:

Email: [support@washapp.am](mailto:support@washapp.am)

Mobile: +37494503350