imID CJSC

PUB007 – Privacy Policy

Notice on the Processing of Personal Data
Consent to the Processing of Personal Data

V1.3

Issue Status

Issue	Issue Date	Additions/Alterations
1.0	22/05/2026	1st issue of public version
1.1	15/10/2025	Amendment to Appendix 1
1.2	15/01/2026	Amendments to Sections 6 and 9 and Appendix 1
1.3	29/05/2026	Renumbering of clauses under the Policy sections, expansion of the subject matter of the Policy to cover service provision through smart devices, and transfer of the content of the template set out in Appendix 1 to Section 3.

Approval Details

Issue	Author: Role & Initials	Approval Date	Approved by: Role & Initials	Date Effective	Next Review
1.0	AH | CLRCO	25/09/2025	Board of Directors	25/09/2025	25/09/2026
1.1	AH | CLRCO	15/10/2025	Executive Team CEO | KM	15/10/2025	15/10/2026
1.2	AH | CLRCO	15/01/2026	Executive Team CEO | KM	15/01/2026	15/01/2027
1.3	AH | CLRCO	27/05/2026	Executive Team CEO | KM	29/05/2026	29/05/2027

1. General Provisions

1. 1. This Privacy Policy (hereinafter referred to as the "Policy" in all grammatical forms) describes the policy for the processing and protection of personal data within the scope of services provided by imID (hereinafter referred to as the "Company" in all grammatical forms).

1.2. This Policy constitutes a notice of intent to process personal data as defined by the Law of the Republic of Armenia "On Protection of Personal Data" and, in the cases and manner prescribed by the Law of the Republic of Armenia "On Protection of Personal Data" and this Policy, consent to process personal data.

1. 3. This Policy applies to services provided by the Company through a website, smart devices (including a mobile application), or other software tools (hereinafter collectively referred to as the "Services"), unless a different policy or notice from this Policy has been established and/or published by the Company.

1. 4. The Company places great importance on the protection of your digital identity and takes all necessary and sufficient measures to keep your personal data confidential and secure.

1. 5. **From the moment you use the services provided by the Company and/or enter into a contract with the Company, you give your consent for the Company to process your personal data in accordance with the legislation of the Republic of Armenia and this Policy, including, but not limited to, requesting and obtaining personal data.**

1. 6. The Company shall review the Policy taking into account changes and developments in legislation, internationally applicable standards in the field, and law enforcement practice. The revised version of the Policy will be available on the Company's website, smart devices (including the mobile application), or other software platforms. The Company recommends that you periodically visit the Company's website or the relevant section of the mobile application or software to ensure that the changes are acceptable to you. If you do not agree with the changes, you have the right to withdraw the consent you previously provided to the Company for the processing of your personal data.

2. Legal Grounds for Personal Data Protection

2. 1. Your personal data is processed on the following basis:

2.1.1. The legislation of the Republic of Armenia, including the Law of the Republic of Armenia "On Protection of Personal Data," the Law of the Republic of Armenia "On Electronic Document and Electronic Digital Signature," Decision No. 572-N of the Government of the Republic of Armenia dated 25 May 2017, Decision No. 1015-N of the Government of the Republic of Armenia dated 24 July 2025, Decision No. 1849-N of the Government of the Republic of Armenia dated 19 December 2019, and other applicable legal acts related to the protection of personal data;

2.1.2. Relevant international ISO and ETSI standards adopted and recognized by the Republic of Armenia;

2.1.3. The agreement concluded/to be concluded with you;

2.1.4. The Company's "General Terms and Conditions for providing strict identification, identity verification, and Electronic Digital Signature Services" and the "General Terms and Conditions for the Use of Certificates through the imID Mobile Application";

2.1.5. Your consent provided within the scope of the services provided by the Company.

3. Personal Data We Collect and Methods of Collection

3. 1. For the purpose of providing the Services, the following personal data provided by you is processed:

3.1.1. The details of your identity document (passport, identification card, residence card, or another identity document provided by the legislation and applicable legal acts of the Republic of Armenia), including, but not limited to, your photograph, first name, last name, patronymic, place and date of birth, registered and/or actual residential address, validity period, series and number of the identity document, date of issuance, and information about the issuing authority;

3.1.2. Your Public Services Number (PSN) or a certificate confirming refusal to obtain one or the absence thereof;

3.1.3. Your telephone number and email address.

3. 2. In providing the Services, the Company may obtain and/or process additional personal data as necessary to improve service quality, complete missing personal data, ensure proper interaction under public and other agreements, enable third parties to provide services to you or process personal data, and uphold the principles of reliability and minimal involvement of data subjects. For these purposes, the Company may, when necessary, request personal data from secondary sources, including through the government interoperability platform, from state and local self-government authorities and from information systems and databases owned by other persons that contain your personal data.

3.3. The personal data specified in Clause 3.2 of the Policy includes the personal data defined in Clause 3.1 of the Policy and at least the following data:

3.3.1. Data relating to termination of citizenship;

3.3.2. Information regarding whether the person is alive or deceased, including death certificate details.

3.4. You agree that secondary sources may transfer to the Company your personal data contained in databases maintained by state and local self-government authorities.

3.5. You give your unconditional consent for the Company, in the course of providing and activating services, to request and obtain your personal data from the State Population Register of the Passport and Visa Department of the Migration and Citizenship Service of the Ministry of Internal Affairs of the Republic of Armenia. This consent is granted solely for obtaining data for the inquiry specified in this clause and does not extend to any other form of data processing. You are also informed that this unconditional consent applies to the correction and updating of data obtained in the future, and no additional consent from you will be required for that purpose.

3.6. Any further processing of personal data obtained through inquiries to state and local self-government authorities will be carried out only on the basis of your additional consent, provided in accordance with the requirements of the Law of the Republic of Armenia "On Protection of Personal Data."

3.7. When you use the Company's online services, the Company's servers also collect statistical data about your use of those services, including your IP address, login time, access date, pages visited on the website and mobile applications, language used, software malfunction reports, and information about the types of browsers used.

3.8. Your personal data will be processed only to the minimum extent necessary to achieve the purposes defined in this Policy.

4. Purposes and Methods of Personal Data Processing

4.1. Personal data is processed for the following purposes:

4.1.1. To identify you by the Company;
4.1.2. To provide the Services to you properly and improve the quality of the Services;
4.1.3. To enable, based on your expression of will, access to services provided by third parties through their online platforms;
4.1.4. To enter valid data into the Company's information databases, update and correct the data contained in those databases, carry out anonymized analyses using the data in those databases, and prevent or detect fraud and abuse related to the Services.

4.2. The Company needs to process your personal data, including collecting, recording, entering, systematizing, organizing, storing, using, modifying, restoring, transferring, correcting, or otherwise processing your personal data, including by using any automated or technical means or without such means.

4.3. Your personal data may be transferred to third parties only in the cases and in the manner prescribed by the legislation of the Republic of Armenia. Your personal data may be transferred to, or access to it may be granted to, state and local self-government bodies of the Republic of Armenia and the organizations on whose electronic platforms you use the Services.

4.4. Electronic documents created and signed by you within the scope of services provided to you on the electronic platforms of state and local self-government bodies of the Republic of Armenia or legal entities are not visible to the Company and are not stored in the Company's information systems.

5. Your Rights

5.1. You have the right to access your personal data and to request the rectification, blocking, or destruction of your personal data if it is incomplete, inaccurate, outdated, unlawfully obtained, or no longer necessary for achieving the purposes of processing.

5.2. Your consent shall remain in effect throughout the term of the contractual relationship with the Company, as well as for the entire period prescribed for document archiving under the legislation of the Republic of Armenia, the general terms and conditions of the services referred to in Clause 2.1 of this Policy, and other relevant internal acts of the Company. You have the right to withdraw your consent at any time by submitting an application to the Company; however, in such case, you will no longer be able to use the services provided by the Company. The Company will discontinue the provision of services, and your personal data will be retained in the Company's archives for up to seven years.

5.3. You have the right to submit a complaint to the Company if you believe that your personal data has been processed in violation of applicable requirements or if you disagree with the procedure for processing your personal data, in accordance with Clause 8.2 of this Policy.

5.4. You also have the right to submit a complaint to the Personal Data Protection Agency of the Ministry of Justice of the Republic of Armenia, as well as to any other competent authorities designated by law in the field of cybersecurity.

6. Data Retention Period

6.1. The Company shall document and retain, as evidence, the data required during your identification and for the issuance of certificates for at least seven years following the expiration of such certificates, as well as information relating to the processes carried out in the course of providing the Services for at least seven years, in order, where necessary, to establish any case of falsification or misrepresentation of your identity and to substantiate the proper performance of the Company's activities in the provision of the Services. Retention of such data is mandatory and is subject to review by independent auditors and, in cases provided by legislation, by the competent authority.

7. Security Measures

7.1. In order to protect the personal data being processed against unauthorized access, alteration, disclosure, or destruction, the Company implements the necessary legal, organizational, and technical safeguards in accordance with the legislation of the Republic of Armenia, including the Law of the Republic of Armenia "On Protection of Personal Data", the Law of the Republic of Armenia "On Cybersecurity," other applicable legal acts, the requirements of the Company's information security policy, and the Company's technical capabilities. The system for storing personal data, which is continuously monitored by the Company's employees, is protected by appropriate measures that ensure compliance with modern security standards.

7.2. Your personal data shall be accessible to the Company's employees only to the extent and for the duration necessary to achieve the purposes set out in this Policy. The Company's employees and other persons granted access to the personal data being processed have signed non-disclosure agreement and have been notified of the possible disciplinary, administrative, civil, and criminal liability for violation of the requirements of the legislation of the Republic of Armenia in the field of personal data processing. In order to protect your personal data, the agreements concluded with all our partners receiving information containing personal data mandatorily include provisions prohibiting the disclosure of confidential information, including personal data.

7.3. You undertake to protect your passwords, computer, smart devices, and any other devices used to access the Company's services. The Company shall not be liable for any unauthorized access to your personal data resulting from your negligence.

7.4. The Company's website and mobile application may contain links to other websites. The Company has no control over and assumes no responsibility for the content or privacy policies of such other websites or applications.

8. Term of Validity of Consent

8.1. Your consent to the rules set forth in this Policy shall remain in effect for an indefinite period until withdrawn by you.

8.2. Any application or request to withdraw consent to the processing of personal data, as well as any application or request for rectification or destruction of personal data, termination of data processing, or any other action relating to such processing, must be submitted by you in paper or electronic form, with a clear description of the specific action relating to the processing of the personal data. The Company shall cease processing your personal data within ten business days following the date of receipt of your application or request. You also acknowledge that, if you withdraw your consent, the Company shall discontinue the provision of services, in which case your personal data shall be retained in the Company's archives for a period of up to seven years.

9. Contact Information

9.1. If you have any questions relating to this Policy, or if you wish to submit a complaint or an application/request under this Policy, you may contact the Company using the following details:
Email address: info@imid.am
Address: RA, Yerevan, 24/1 Azatutyan Avenue
Telephone number: +374 60 85 85 00