

PRIVACY POLICY

“Chevvick Solutions” LLC

1. General Provisions

This Privacy Policy defines the rules for the collection, processing, transfer, storage, and protection of personal data processed through the Chewick platform (hereinafter – the “Platform”) provided by “Chevvick Solutions” LLC (hereinafter – the “Company”).

The Company does not act as a financial institution providing payment services. The Company does not process payment transactions, does not store bank card data, and does not perform the technical execution of payments.

The Platform performs a technical integration and data transmission function between business entities and the organization providing payment services.

The direct processing of payment transactions, including the acceptance of payment requests, processing of card data, authorization, confirmation, and execution of transactions, is carried out by **Multi Solutions LLC** (hereinafter – the “PSP”).

This Privacy Policy has been prepared in accordance with the Law of the Republic of Azerbaijan ‘On Personal Data’ and other applicable regulatory acts.

2. Roles and Responsibilities of the Parties

In the process of personal data processing:

- “Multi Solutions” LLC – acts as the primary party responsible for the collection and storage of personal data;
- “Chevvick Solutions” LLC – acts as an intermediary responsible for technical data transmission and system integration;
- Business entity (Merchant) – a legal or natural person using the Platform;
- End user – a natural person making a payment.

The Company:

- does not process payment transactions;
- does not independently accept payment requests but transmits them technically;
- does not collect or store card data;
- does not make decisions regarding approval or rejection of transactions.

The Company only transmits refund (reversal) requests submitted by the business entity to the PSP through technical means. The processing and execution of refund transactions are carried out by the PSP.

3. Collection and Processing of Personal Data

3.1. Data Related to End Users

The Company does not directly collect or store the following data of end users:

- First name, last name
- Card details
- Phone number
- Email address
- Address information
- Biometric identification data

The collection and storage of such data are performed by the PSP.

The Company may obtain temporary technical access to limited data strictly necessary for technical identification of the transaction, including:

- Transaction identifier
- Transaction status
- Date and time information
- Technical response codes

Such data is used solely to ensure proper transmission of transactions and to resolve technical system errors.

3.2. Data Related to Business Entities

During registration on the Platform, the following data may be obtained:

- Legal entity name and Tax Identification Number (TIN)
- Contact number and email address
- Name and surname of the responsible person
- Other information and documents required in accordance with the legislation of the Republic of Azerbaijan

Such data is processed for the purposes of:

- Establishing contractual relations
- Granting system access rights
- Providing technical support

3.3. Technical and Automatically Collected Data

While using the Platform, the following technical data may be recorded:

- IP address
- Device and browser type
- Transaction time
- System logs

This data is used solely for:

- Ensuring information security
 - Maintaining system stability
 - Preventing cybersecurity risks
-

4. Retention of Personal Data

The data stored by the Company is of a technical nature only and may be retained for a minimum period of five (5) years in accordance with applicable legislation.

The storage and protection of primary personal data are carried out by the PSP.

5. Transfer of Personal Data

The Company does not transfer personal data to third parties.

Exceptions apply in the following cases:

- Requests from state authorities in accordance with applicable legislation;
- A court decision or other lawful basis.

All data transfers are carried out through secure technical channels.

6. Archiving and Destruction of Personal Data

Archiving and destruction of personal data are carried out in accordance with the applicable legislation of the Republic of Azerbaijan.

If a request for data deletion is submitted by a personal data subject, the Company shall take measures within its authority and, where necessary, forward the request to the PSP.

7. Rights of the Data Subject

The personal data subject has the right to:

- Obtain information regarding the processing of their personal data;
 - Request correction or deletion of their personal data;
 - Object to the processing of their personal data;
 - File a complaint with the relevant state authorities.
-

8. Updates to the Policy

The Company reserves the right to amend this Privacy Policy. The updated version shall be published on the Platform and the official website.

9. Contact

For inquiries regarding personal data protection:

Email: info@chewick.com

Regulatory authority:
The Central Bank of Azerbaijan Republic

Hotline: (+994 12) 966

Phone: (+994 10) 256 00 66