

Legal Information

Privacy Policy

Sky Mobile LLC (hereinafter referred to as the Company, we, us, our) values the trust you place in us by providing your personal and other data and takes all necessary technical, organizational and legal measures to protect it. To learn what personal data we collect, how we process and protect it, please carefully read this Privacy Policy (hereinafter referred to as the Policy).

Contact Details

Sky Mobile LLC, TIN 02404200610104, address: 115 Ibraimova St., Bishkek, Kyrgyz Republic, phone: +996 (775) 582099, official website of the Company: www.beeline.kg, e-mail: office@beeline.kg.

For any questions concerning this Policy, you may contact us by e-mail or postal address. Since electronic correspondence is not always secure, please do not send us sensitive confidential information by e-mail.

We will endeavor to respond promptly to any of your requests.

General Provisions

We have developed this Policy in accordance with the requirements of the legislation of the Kyrgyz Republic in the field of personal data processing and protection.

In this Policy, we set out the legal grounds for processing, the list of personal data collected, the purposes of processing, the rights and obligations of the Company and our clients, as well as the measures we take to ensure the security of your personal data.

The Policy is available for review on the Company's website.

Your personal data held by the Company is recognized as confidential information.

By interacting with the Company, including by accessing the Company's services, you agree to this Policy.

Legal Grounds for Personal Data Processing

In accordance with the requirements of the legislation of the Kyrgyz Republic, the Company provides telecommunications services to users (subscribers) only if the user (subscriber) completes the personalization (registration) procedure and enters into a user agreement (agreement for the provision of telecommunications services) in the manner and on the terms established by the Digital Code of the Kyrgyz Republic and the Rules for the Provision of Mobile Radiotelephone Communication Services approved by Resolution of the Cabinet of Ministers of the Kyrgyz Republic dated September 22, 2023 No. 501.

The conclusion and performance of an agreement with the Company constitute the basis for processing personal data that you provide to us directly when entering into the agreement and that become available to the Company in the course of providing services under the agreement.

If personal data processing is required for other purposes unrelated to the conclusion and performance of the user agreement, such processing is carried out on the basis of separate consent, which may be given in writing or electronically through the Company's channels, including the website and mobile application.

List of Data Collected

This Policy applies to all personal data and other information provided by you when entering into a user agreement (agreement for the provision of telecommunications services), another agreement with the Company, provided when contacting our information service (call center), entered on the Company's website, web resources and mobile applications, obtained through widgets and other interactive tools used that contain a link to this Policy, when you choose to participate in our offers and programs, purchase our products (devices and other products), or otherwise interact with us, as well as information obtained by the Company in the course of providing services, including in partnership with other companies.

We collect and use the following data about you:

1. Biometric data: photo and/or video image of the face (selfie), user's handwritten signature.
2. Identification data: Such data include: full name, date of birth, address, identity document details (name, series, number, dates of issue, issuing authority), telephone number, as well as other information that you agree to provide.
3. Data on services provided: The Company has data on services provided to the client under the user service or another agreement, tariff plans used, the method of payment for services, activated additional services, the personal account balance, arrears for services provided, as well as other information that came into the Company's possession in connection with providing services to the user.

4. Information obtained when visiting the website: The Company uses user data in order to enable the use of the Company's services.
5. Mobile device and technical usage data: The Company collects data about the subscriber's device, such as IMEI (International Mobile Equipment Identity) - the international identification code for mobile communication devices, operating system, received signal strength, identifiers and settings of the subscriber device.
6. Data when topping up the personal account: The Company may have access to information about personal account top-up transactions made using a bank card/e-wallet and other top-up instruments. The Company does not use payment data except for the provision and marketing promotion of services.
7. Data for refund of advance funds from the user's personal account: the user enters such data independently by submitting a written application on the relevant web resources and in mobile applications.
8. Data on payments made within mobile financial services (if applicable): the user independently enters such data on the relevant web resources and in mobile applications of the respective service: payment amount, service provider name, personal account number with the service provider, bank card number, e-wallet number, etc.
9. Location information: the Company has information about the subscriber's location based on data relating to connection to the Company's network when using services.
10. Aggregated and anonymized data: The Company may use any of the above types of data to create aggregated and anonymized analytical information and reports (for example, where personal information is used to calculate the percentage of our users in a particular region).
11. Other user data in the Company's possession that you have agreed to provide.

The list of personal data collected for the provision of telecommunications services is the minimum necessary for entering into the user agreement (agreement for the provision of telecommunications services), and the requirement for the user to provide such data is established by the legislation of the Kyrgyz Republic.

This Policy does not apply to information collected on information resources owned by third parties or independently transmitted by you to anyone through the use of our communication networks. Third-party information resources may have their own personal data protection policy (privacy policy). Before using third-party information resources and providing them with personal data, we strongly recommend that you carefully review the privacy policies of such resources and exercise extreme caution when disclosing your personal data.

Purposes of Personal Data Processing

We process personal data and information about you for the following purposes:

- performance of the terms of the user agreement and other agreements concluded between the Company and the user;
- provision of services of the Company's partners, including services provided to the Company by third parties and by the Company to third parties;
- improving the quality of the services and customer service provided, including so that we can respond to your inquiries and process your requests;
- participation of users in contests and advertising campaigns, including on social media;
- determining and forecasting your needs, preferences and interests and providing you with personalized offers, discounts, promotions for goods and services, advertising, informational messages, marketing services from both our Company and our partners, through the mobile application, SMS messages, e-mail, telephone, post, distribution over the network and other methods determined by the Company based on its technical and commercial capabilities;
- developing and offering new products and services, informing subscribers and users of changes to the terms of the services provided and the service procedure;
- protecting clients and the Company against fraudulent activities related to the use of the Company's services;
- providing reports to government authorities;
- collecting accounts receivable;
- for our internal purposes, including data analysis, auditing, and assessment of the effectiveness of advertising campaigns;
- exercise by the Company and third parties of rights and obligations established by applicable law.

Your Rights

- Data changes. Changes to your personal data held by us are made upon your written application accompanied by documents confirming the change to your data.
- Withdrawal of your consent. You have the right at any time to withdraw your consent by submitting a written application to the Company/the Company's sales and service offices. However, please note that we need your personal data in order for the Company to provide telecommunications services. In this case, withdrawal of your consent entails termination of the user agreement and discontinuation of all types of services provided by the Company and its partners.
- Rights regarding data. You have the right to obtain information about the data we hold about you or to obtain a copy of the data we hold about you. You may exercise your rights by contacting us in writing.

- Complaints. If you wish to lodge a complaint about how your data is processed, please contact us and we will endeavor to respond to your request as quickly as possible.

Personal Data Retention Periods

We store your personal data for the period necessary for the Company to achieve the purposes for which it is collected and processed under the user agreement (agreement for the provision of communication services), as well as for the period specified in the consent signed by you (if applicable), taking into account the retention periods established by the legislation of the Kyrgyz Republic.

Measures taken by the Company to protect personal data:

Access to your personal data is provided only to those Company employees who need such data to perform their functional duties.

All our employees sign confidentiality obligations and are informed of the liability arising from violation of the requirements for the protection of subscribers' personal data.

Your personal data is stored in our electronic databases that comply with information security standards.

Transfer of Personal Data to Third Parties

We may transfer your data, including across borders, i.e. transfer data to third parties under the jurisdiction of other states, including:

- our partners and third parties acting on our instructions or in partnership with us, which will allow us to tailor the offers and messages we send to you, as well as for the purpose of the Company fulfilling its obligations under the user agreement (agreement for the provision of communication services), and providing other services in partnership with other companies;
- the Company's processing partners, partner banks, payment organizations and payment system operators, enabling such partners to process data when conducting transactions and making payments, etc.;
- third parties in the event of reorganization, sale, formation of a joint venture, assignment or other similar actions in relation to part or all of the Company's business or assets.
Before carrying out a cross-border transfer of personal data, we will ensure that the foreign state to whose territory the personal data is transferred provides adequate protection of the rights of personal data subjects and is included in the list approved and published by the sectoral regulator in the field of personal data on its website.

The transfer of personal data to partners is based on the principles of lawfulness and confidentiality of the personal data transferred. An agreement containing provisions on non-disclosure of clients' personal data and other confidential information is concluded with each partner. In agreements with partners, we stipulate requirements preventing dissemination of clients' personal data without their consent or another legal basis.

We may transfer your data to law enforcement agencies, government authorities and other organizations if the provision of such data is required by the legislation of the Kyrgyz Republic.

Cookies and Other Technologies

Cookies: The Company and third-party service providers may use cookies on the website. Cookies allow a web server to transfer data to a computer for storage and other purposes. We use cookies and other technologies, in particular, to provide a higher level of service, provide more complete information, and enable you to use the website continuously. Our service providers are also permitted to use cookies on our website. If you do not require information obtained using cookies, you may disable cookies - this is a standard feature available in almost all browsers.

Local Shared Objects: The Company and third-party service providers may use Flash local shared objects ("Flash objects") for certain purposes, including to identify you and remember the contents of your shopping cart. Flash objects differ from cookies in the amount and type of data stored. In addition, as a rule, you cannot control, delete, or opt out of the use of Flash objects through your browser. For more information about Flash objects and how to manage them, open the Help page in Flash Player, select the "Global Storage Settings" panel and follow the instructions. To find Flash objects on your computer, open the "Website Storage Settings" panel and follow the instructions there to view or, at your discretion, delete specific Flash objects.

Website analytics: The Company may work with third-party service providers that use the technologies described in this section to perform website analytics and track and understand how visitors use the website.

Expense analysis in the Personal Account on the beeline.kg website is for informational purposes only and does not constitute an itemized statement. An accurate itemized statement can be obtained by contacting subscriber service offices.

IP Addresses

Methods for determining an IP address: The “IP address” of your computer is a number automatically assigned to your computer by your Internet service provider (ISP).

An IP address may be automatically determined and logged on the server when a user visits the Site; the time of the visit and pages visited are also recorded. Determining an IP address is standard practice performed automatically on many websites.

Rules for use and disclosure of IP addresses: We may use IP addresses to determine Site usage statistics, diagnose server problems, detect fraud, administer the Site and for other purposes. We may also use IP addresses and disclose them to third parties for any purposes for which personal information is used and disclosed.

User Responsibility

Any actions performed by you using a number registered in your name are deemed to have been performed by you.

You undertake to ensure the security of the number and the confidentiality of data associated with use of the number. In particular, you may not transfer your identifier or provide access to it to third parties and bear full responsibility for its security and individual use, independently choosing the method of storage and restriction of access to it.

In the event of unauthorized access to the number or another identifier, its loss or disclosure to third parties, the Company shall not be liable.

Changes to the Policy

The Company reserves the right to amend this Policy. A new version of the Policy takes effect from the moment it is posted on the Company's website, unless otherwise provided by the new version of the Policy. Please periodically review the Policy for updates and changes made to this Policy. By interacting with us after such changes are made, you accept the new version of the Policy.