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Privacy policy

How ULAN AGENCY LLC collects, uses, discloses, and protects your information when you use the website or the Ulan mobile application.

Last updated 18 Nov 2026 | ULAN AGENCY LLC, Tashkent | privacy@ulan.uz

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This Privacy Policy for **ULAN AGENCY LLC** (doing business as **"Ulan"**, **"we"**, **"us"**, or **"our"**) describes how and why we may access, collect, store, use, and/or share (**"process"**) your personal information when you use our services (**"Services"**), including when you:

- visit our website at https://www.ulan.uz or any related website of ours that links to this Privacy Policy (including the brand dashboard at app.ulan.uz);
- download and use our mobile application **Ulan** on iOS or Android, or any other application of ours that links to this Privacy Policy;
- use Ulan. Ulan connects brands with 1,000+ verified creators on Instagram, TikTok, YouTube, and Telegram in Uzbekistan. Launch your creator marketing campaign in days, not weeks. Creators use the Ulan iOS and Android apps. Brands and staff use the website. Telegram may be used as an optional notification channel or as a social platform where campaigns are published; or
- engage with us in other related ways, including any marketing or events.

Reading this Privacy Policy will help you understand your privacy rights and choices. We are responsible for making decisions about how your personal information is processed. If you do not agree with our policies and practices, please do not use our Services. If you have questions or concerns, please contact us at privacy@ulan.uz.

Effective date: 31 August 2026. Last updated: 18 November 2026.

Summary of key points

This summary highlights key points from this Privacy Policy. Full details appear in the sections that follow.

- **What personal information do we process?** When you visit, use, or navigate our Services, we may process personal information depending on how you interact with us and the Services, the choices you make, and the products and features you use.
- **Do we process sensitive personal information?** We do not process sensitive personal information.
- **Do we collect information from third parties?** We may collect information from public databases, business partners, social media platforms, and other outside sources.
- **How do we process your information?** We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so.
- **When and with whom do we share personal information?** We may share information in specific situations and with specific categories of third parties, as described in this Privacy Policy.
- **How do we keep your information safe?** We implement appropriate organizational and technical measures to protect your personal information. No electronic transmission over the internet or information storage technology can be guaranteed 100% secure.
- **What are your rights?** You may review, update, or request deletion of your Personal Information, and you may withdraw consent or opt out of marketing as described below.
- **How do you exercise your rights?** You may update your account in the Services, visit https://www.ulan.uz/privacy-policy, or email privacy@ulan.uz. We will consider and act upon any request in accordance with applicable data protection laws.

1. Information we collect

We collect information that identifies, relates to, describes, or could reasonably be linked with you (**"Personal Information"**).

A. Personal information you provide directly

We collect information that you voluntarily provide when registering an account, creating a profile, submitting campaign briefs, joining the creator waitlist, or communicating with us. This includes:

- **Contact and identity data:** full name, email address, phone number, and mailing or shipping address
- **Account credentials:** username, password, and account preferences. Brands and staff sign in with email and password. Creators sign in with a phone number and a one-time SMS code
- **Profile and campaign data:** bio, city, categories, languages, social handles and links, availability, briefs, applications, bookings, in-booking chat, and reviews
- **User-generated content:** photos, videos, profile images, portfolio, deliverables, proofs, brief descriptions, comments, or other materials you upload or post to the platform
- **Optional Telegram details:** a Telegram username or a linked Telegram account, used for notifications and support
- **Payment data:** if you make a purchase, we may collect data necessary to process the payment. Payment card details are handled and stored by Click and Rahmat, not on our servers. See their privacy notices: Click and Rahmat

We do not process sensitive personal information. All personal information that you provide to us must be true, complete, and accurate, and you must notify us of any changes to such personal information.

B. Personal information collected automatically (derivative and technical data)

We automatically collect certain information when you visit, use, or navigate the Services. This information does not reveal your specific identity (such as your name or contact information) but may include device and usage information. It is primarily needed to maintain the security and operation of our Services, and for our internal analytics and reporting purposes. Like many businesses, we also collect information through cookies and similar technologies. The information we collect includes:

- **Log and usage data:** service-related, diagnostic, usage, and performance information our servers automatically collect, which may include your IP address, browser type and settings, access times, pages or screens viewed, referring URLs, searches, features used, system activity, error reports (sometimes called "crash dumps"), country, and hardware settings
- **Device data:** information about the computer, phone, tablet, or other device you use to access the Services, which may include IP address (or proxy server), device and application identification numbers, hardware model, operating system, browser type, internet service provider and/or mobile carrier, and system configuration information
- **Location data:** information about your device's location, which may be precise or imprecise. How much we collect depends on the device and its settings. We may infer a general geographic location from your IP address, and we may use GPS and other technologies when you grant location permission. You may opt out by refusing access or disabling Location settings on your device; if you do so, certain aspects of the Services may be unavailable

Our use of information received from Google APIs adheres to the Google API Services User Data Policy, including the Limited Use requirements.

C. Mobile device permissions and features

If you use our mobile application, we may request access or permissions to certain features on your mobile device, including:

- **Location access:** precise geographic position (GPS coordinates) to allow creators to pin location tags or shipping points
- **Camera access:** to capture media or document uploads directly within the application
- **Photo library / storage:** to upload media files, portfolio pieces, or campaign assets
- **Push notifications:** to send real-time alerts regarding campaign updates, messages, or account notifications. You can toggle push notifications off in your device or app settings at any time

We do not request access to your contacts.

D. Information collected from other sources

We may receive information about you from third-party sources, such as public databases, business partners, social media platforms, or creator verification services.

Instagram connection (creators): a creator may connect an Instagram professional account (Creator or Business) through Instagram's own login (the Instagram API with Instagram Login, provided by Meta Platforms, Inc.). It is a connection, not a way to sign in: creators sign in to Ulan with a phone number and a one-time SMS code, and we do not offer sign-in with Instagram, Facebook, Google, or any other social network. When you connect, Instagram asks for your permission, and we then receive:

- **Profile:** Instagram user ID, username, name, account type, profile photo, follower and following counts, number of posts, and bio
- **Posts:** each post's ID, link, date, type, and like and comment counts, and its picture (shown only to you, in Recent posts on your Ulan profile, and kept for a few minutes at most). For a post you link to an order, we keep its link, date, type, and statistics
- **Post statistics** (if you grant the insights permission): views, reach, likes, comments, saves, shares, and total interactions. For posts and Stories, also the follows and profile visits that came from the post, and the profile actions it led to (taps on the link in your bio, calls, directions, emails, and messages). For Reels, also average and total watch time, the skip rate, and views on Facebook if the Reel was shared there. For Stories, also replies and how viewers moved through them (taps forward and back, swipes to the next story, and exits)
- **Account insights** (if you grant the insights permission): your account's reach, views, accounts engaged, interactions, and follows and unfollows over the last 30 days, and the age, gender, top cities, and countries of your followers and of the accounts that engaged with your content. Instagram shares these only as totals and groups, never as a list of people, and shares the age, gender, city, and country groups only for accounts with at least 100 followers

We use this information to:

- verify that the account is real, is a professional account, and meets our follower minimum
- show your Instagram username and follower count on your Ulan creator profile, which brands can see
- show you the statistics of your own posts, and your audience and account insights on your Ulan profile

- show the brand of an order the statistics of the post you published for that order. We update these statistics for up to 30 days after the post is published (Stories: their 24 hours), and you, the brand, and Ulan's team can refresh them on the order page; the latest values stay with the order until you disconnect Instagram or delete your account
- show brands on Ulan a summary of your audience on your creator profile and next to your applications: the share of your followers and engaged accounts by age, gender, city, and country (the top five of each, as percentages, without counts) and your account's totals for the last 30 days. Ulan's team sees the same summary. Brands use it to choose creators whose audience fits their campaign, and see it only while it is less than 30 days old
- help Ulan's team find creators for brands with our AI search (see section 3C), which processes your Instagram username, follower and post counts, and bio. It does not use your post statistics, audience, or account insights

We read your account insights when you connect Instagram, then once a week while you stay connected, and when you refresh the Instagram card on your Ulan profile (at most once an hour). We do not send your post statistics, audience, or account insights to analytics services or to our AI assistant.

Ulan never posts on your behalf and does not read your messages. Your Instagram access token is stored encrypted (AES-256-GCM), is used only by our servers, and is refreshed while you stay connected. We keep a copy of your Instagram profile photo and use it as your Ulan profile photo only if you do not have one.

You may withdraw this permission at any time. Disconnect Instagram in Ulan (on the web: Profile → Instagram → Disconnect), and we delete the access token, the stored Instagram profile, your post statistics, and your account insights at once. If you connect a different Instagram account, we delete the post statistics and account insights of the previous one. If you remove Ulan in your Instagram settings (Apps and websites), Meta notifies us and we delete the same data. Deleting your Ulan account deletes it too, and so does a deletion request sent to privacy@ulan.uz. If your Instagram photo became your Ulan profile photo, it stays as your profile photo until you change it. Step-by-step instructions are on our Delete your account and data page. Instagram's own processing of your data is described in the Instagram Privacy Policy.

2. How we use your information

We process your information to provide, improve, and administer our Services, communicate with you, for security and fraud prevention, and to comply with law. We may also process your information for other purposes with your consent. We process your information only when we have a valid legal reason to do so. Depending on how you interact with our Services, this includes:

- **Account creation and authentication:** to create and manage your account, keep it in working order, and sign you in (email and password for brands and staff; phone number and a one-time SMS code for creators)
- **Service delivery:** to deliver core platform functionality, match brands with creators, and run bookings (including shipping, revisions, chat, and reviews)
- **Support:** to respond to inquiries and resolve issues with the requested service
- **Marketing and promotions:** to send promotional communications in accordance with your marketing preferences. You may opt out at any time as described in "User privacy rights" below. We may still send service-related messages necessary to administer your account
- **Protecting our Services:** to keep the Services safe and secure, including fraud monitoring and prevention, and to enforce our Terms of Service

- **Improvement and analytics:** to identify usage trends, evaluate and improve our Services, products, marketing, and your experience, and test new platform capabilities
- **Legal obligations:** to comply with applicable law, respond to legal requests, and exercise, establish, or defend our legal rights

3. Disclosure and sharing of your information

We do not sell your personal information. We share it only with trusted third parties under confidentiality and data-protection standards, and with a brand when you apply to or perform work on that brand's campaign.

A. Third-party service providers

We share data with third-party service providers performing functions on our behalf across the following categories:

- Data storage service providers
- Website hosting service providers
- Communication and collaboration tools
- User account registration and authentication services (including SMS)
- Data analytics services (e.g., Google Analytics, Yandex Metrica)
- Payment processors
- Social networks, where a campaign or profile requires it

These providers process Personal Information on our behalf under contract and receive only the information reasonably required to perform their functions. They may not use your personal information except as we instruct, may not share it with any organization apart from us, and commit to protect the data they hold on our behalf and to retain it for the period we instruct.

B. Online payment processing

All online transactions are processed through secure payment gateway providers. We do not store full payment card details on our servers. Your payment information is processed directly by our payment vendors in accordance with their respective privacy policies:

- **Click:** Click Privacy Policy
- **Rahmat (Multicard):** Rahmat Privacy Policy

C. Artificial intelligence (AI) services

As part of our Services, we offer products, features, or tools powered by artificial intelligence, machine learning, or similar technologies (collectively, **"AI Products"**). This Privacy Policy governs your use of the AI Products within our Services.

We provide the AI Products through third-party service providers (**"AI Service Providers"**), including **Anthropic**, **Google Cloud AI**, **OpenAI**, and **Voyage AI** (search). Your input, output, and personal information may be shared with and processed by these AI Service Providers to enable your use of our AI Products. You must not use the AI Products in any way that violates the terms or policies of any AI Service Provider. Our AI Products are designed for analytics, research, search, predictive insights, text analysis, and document generation.

All personal information processed using our AI Products is handled in line with this Privacy Policy and our agreements with those providers. If you wish to opt out of having your profile data processed for AI-generated campaign insights, you may submit a request to privacy@ulan.uz.

D. Business partners and legal requirements

If you apply to or perform work on a campaign, we share with the brand the profile, deliverables, and contact or shipping details reasonably required to complete the engagement. The brand may thereafter process that information in accordance with its own policies.

We may share necessary data with business partners to deliver joint services or campaign integrations. We do not sell your personal information, and we do not display third-party advertisements on the Services.

We may disclose your information if required to do so by applicable laws, legal process, or governmental requests, or to protect the rights, safety, or integrity of persons or the Services.

Business transfers: we may share or transfer your information in connection with, or during negotiations of, any merger, sale of company assets, financing, or acquisition of all or a portion of our business to another company.

4. Cookie policy and tracking technologies

A. Use of cookies, pixels, and web beacons

We use cookies, local storage, web beacons, pixels, and similar tracking technologies to store user settings, keep you signed in, enhance security, prevent crashes, fix bugs, analyze web traffic, and understand user interactions. You may control or block cookies through your browser settings; however, disabling cookies may affect the functionality of the Services.

B. Google Analytics

We use **Google Analytics** to analyze website activity. Google Analytics uses cookies to collect standard log and visitor-behavior information. We do not enable Google Analytics Advertising Features or display third-party advertisements on our platform. To opt out of being tracked by Google Analytics across the Services, visit https://tools.google.com/dlpage/gaoptout. For more information on the privacy practices of Google, please visit the Google Privacy & Terms page.

Further detail on the cookies we set on the Website is in our Cookie Policy.

C. Yandex Metrica

We also use **Yandex Metrica** to analyze website activity. It uses cookies to collect standard log and visitor-behavior information and records how pages are used (mouse movements, scrolling and clicks) so that a visit can be replayed; what you type into forms is not recorded. To opt out of Yandex Metrica across the Services, use the Yandex Metrica blocker. For more information on the privacy practices of Yandex, please visit the Yandex Privacy Policy page.

5. Google Maps Platform APIs and location data

Our Services integrate **Google Maps Platform APIs** to allow creators and brands to pin addresses, specify campaign coverage areas, and store location coordinates. We may share location data (for example, an address, coordinates, and location pins) with Google when you make a location-specific request. Google Maps uses GPS, Wi-Fi, and cell towers to estimate location. GPS is typically accurate to about 20 meters; Wi-Fi and cell towers

may improve accuracy when GPS signals are weak, such as indoors. Location estimates are not always perfectly precise. The Google Maps Platform APIs that we use may store and access cookies and other information on your devices.

- **Terms of Service:** by using the Ulan website or application, you agree to be bound by the Google Terms of Service and the Google Privacy Policy
- **Location collection and storage:** when you pin an address or coordinates (for example, for sample shipping or a regional tag), that location data is transmitted and stored with your account for as long as the account remains active. You may update or delete a saved pin in your account. You may also revoke location consent by changing your device settings or by contacting us at the details in "Contact us" below

6. Data retention and security measures

- **Retention:** we retain your Personal Information only for as long as it is necessary for the purposes set out in this Privacy Policy, unless a longer retention period is required or permitted by law (such as tax, accounting, or other legal requirements). Typical retention after account deletion is up to one year unless a longer period is required. When we have no ongoing legitimate business need to process your Personal Information, we will delete or anonymize it or, if that is not immediately possible (for example, because it is stored in backup archives), we will securely store it and isolate it from further processing until deletion is possible
- **Security:** we implement appropriate technical, administrative, and physical security measures designed to safeguard your Personal Information against unauthorized access, loss, alteration, or disclosure. No internet transmission or electronic storage system can be guaranteed 100% secure, and we cannot promise that unauthorized third parties will not defeat our security. Transmission of Personal Information to and from the Services is at your own risk. You should access the Services in a secure environment and keep your device, email, and phone number secure

Where your data is stored: our servers and file storage are in Germany (Hetzner Online GmbH, Nuremberg). Some service providers process data in other countries: our AI providers (Anthropic, OpenAI, Voyage AI) and Google in the United States, Yandex Metrica in Russia, and SMS (Eskiz) and payments (Click, Rahmat) in Uzbekistan. We use contractual, access-control, and security measures appropriate to those transfers.

7. User privacy rights

Regardless of your jurisdiction, Ulan provides all registered users with equal rights to access, update, and manage their Personal Information. These rights may be limited in some circumstances by applicable law.

Your rights

- **Access and review:** you have the right to request access to the Personal Information we hold about you and details about how we have processed it
- **Correction and update:** you may update or modify your account information directly in the mobile application or in account settings
- **Deletion / account termination:** you may request deletion of your account and Personal Information. Upon such a request, we will deactivate or delete your account and information from our active databases. We may retain some information in our files to prevent fraud, troubleshoot problems, assist with investigations, enforce our legal terms, or comply with applicable legal requirements

- **Withdrawing consent:** if we rely on your consent to process Personal Information, you may withdraw that consent at any time by contacting us. Withdrawal does not affect the lawfulness of processing before withdrawal, nor processing based on other lawful grounds
- **Marketing opt-out:** you may unsubscribe from marketing and promotional communications at any time by toggling off push notifications in the application settings, contacting support, or emailing privacy@ulan.uz. We may still send service-related messages necessary to administer your account, respond to service requests, or for other non-marketing purposes

How to exercise your rights

- **In-app / web:** navigate to your profile settings to edit or update your information, or submit a request at https://www.ulan.uz/privacy-policy
- **Account and Instagram data deletion:** follow the steps on our Delete your account and data page
- You may turn off marketing push notifications in the application or in your device settings
- **Direct email:** submit a data access, deletion, AI opt-out, or marketing opt-out request by emailing privacy@ulan.uz. Please include sufficient identifying information (name, phone number, or email address) for us to locate your account

8. Controls for Do-Not-Track features

Most web browsers and some mobile operating systems and mobile applications include a Do-Not-Track ("DNT") feature or setting you can activate to signal your preference not to have data about your online browsing activities monitored and collected. At this stage, no uniform technology standard for recognizing and implementing DNT signals has been finalized. As such, we do not currently respond to DNT browser signals or any other mechanism that automatically communicates your choice not to be tracked online. If a standard for online tracking is adopted that we must follow in the future, we will inform you about that practice in a revised version of this Privacy Policy.

9. Minors and children's privacy

The Services are intended exclusively for individuals aged 18 and older. We do not knowingly collect, solicit, market to, or sell personal information of children under 18 years of age. By using the Services, you represent that you are at least 18 years of age. If we learn that personal information from a user under 18 has been collected, we will deactivate the account and take reasonable measures to delete the data promptly.
If you become aware of any data we may have collected from a person under 18, please contact us at privacy@ulan.uz.

10. Updates to this Privacy Policy

We may update this Privacy Policy from time to time to stay compliant with relevant laws and to reflect changes in our operational practices. The updated version will be indicated by a revised date at the top of this page. If we make material changes, we may notify you by prominently posting a notice of such changes or by sending you a notification. We encourage you to review this Privacy Policy periodically.

11. Contact us

If you have questions, concerns, or data requests regarding this Privacy Policy, please contact us at:

ULAN AGENCY LLC
(Trade Name: Ulan)
Address: Iftixor MFY, Iftixor ko'chasi, 1-uy, Tashkent, Tashkent 100057, Uzbekistan
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