

## **Privacy and Personal Data Processing Policy**

This Privacy and Personal Data Processing Policy regulates the procedure for processing and using personal and other data of the website of TOO "IskraIndex" (hereinafter — the Operator). The current version of this Privacy Policy is permanently available for review and is posted on the Internet at: [www.iskraindex.com](http://www.iskraindex.com).

By transferring personal and other data to the Operator through the Website, the User confirms their consent to the use of the specified data under the terms set forth in this Privacy Policy.

If the User does not agree with the terms of this Privacy Policy, they must stop using the Website.

The unconditional acceptance of this Privacy Policy is the start of the User's use of the Website.

### **1. TERMS**

1.1. Website - a website located on the Internet at [www.iskraindex.com](http://www.iskraindex.com).

All exclusive rights to the Website and its individual elements (including software, design) belong to the Operator in full. The transfer of exclusive rights to the User is not the subject of this Privacy Policy.

1.2. User — a person using the Website.

1.3. Legislation — the current legislation of the Republic of Kazakhstan.

1.4. Personal Data — personal data of the User that the User provides independently during registration or in the process of using the Website's functionality.

1.5. Data — other data about the User (not included in the concept of Personal Data).

1.8. Service(s) — services provided by the Operator under an agreement.

### **2. COLLECTION AND PROCESSING OF PERSONAL DATA**

2.1. The Operator collects and stores only those Personal Data that are necessary for the provision of Services by the Operator and interaction with the User.

2.2. Personal Data may be used for the following purposes:

2.2.1 - provision of Services to the User;

2.2.2 - identification of the User;

2.2.3 - interaction with the User;

2.2.4 - sending advertising materials, information and requests to the User;

2.2.5 - conducting statistical and other research;

2.3. The Operator, among other things, processes the following data:

2.3.1 - email address.

### **3. PROCEDURE FOR PROCESSING PERSONAL AND OTHER DATA**

3.1. The Operator undertakes to use Personal Data in accordance with the Law of the Republic of Kazakhstan "On Personal Data" and the Operator's internal documents.

3.2. Confidentiality is maintained regarding the User's Personal Data and other Data, except in cases where such data is publicly available.

3.3. The Operator has the right to retain an archival copy of Personal Data.

The Operator has the right to store Personal Data and Data on servers outside the

territory of the Republic of Kazakhstan.

3.4. The Operator has the right to transfer Personal Data and User Data without the User's consent to the following persons:

3.4.1 state bodies, including investigation and inquiry bodies, and local self-government bodies upon their reasoned request;

3.4.2 in other cases expressly provided for by the current legislation of the Republic of Kazakhstan.

3.5. The Operator has the right to transfer Personal Data and Data to third parties not specified in clause 3.4. of this Privacy Policy in the following cases:

3.5.1 The User has expressed consent to such actions;

3.5.2 The transfer is necessary within the framework of the User's use of the Website or the provision of Services to the User.

3.6. The Operator carries out automated processing of Personal Data and Data.

#### **4. PROTECTION OF PERSONAL DATA**

4.1. The Operator ensures proper protection of Personal and other data in accordance with the Legislation and takes necessary and sufficient organizational and technical measures to protect Personal Data.

4.2. The applied protection measures, among other things, allow protecting Personal Data from unlawful or accidental access, destruction, modification, blocking, copying, distribution, as well as from other unlawful actions by third parties.

#### **5. OTHER PROVISIONS**

5.1. The law of the Republic of Kazakhstan shall apply to this Privacy Policy and the relations between the User and the Operator arising in connection with the application of the Privacy Policy.

5.2. All possible disputes arising from this Agreement shall be resolved in accordance with the current legislation at the place of registration of the Operator.

Before applying to the court, the User must comply with the mandatory pre-trial procedure and send a corresponding written claim to the Operator. The response time to a claim is 30 (thirty) business days.

5.3. If for any reason one or more provisions of the Privacy Policy are found to be invalid or unenforceable, this does not affect the validity or applicability of the remaining provisions of the Privacy Policy.

5.4. The Operator has the right to change the Privacy Policy (in whole or in part) unilaterally at any time without prior agreement with the User. All changes come into force from the moment of its posting on the Website.

5.5. The User undertakes to independently monitor changes to the Privacy Policy by reviewing the current version.

5.6. All suggestions or questions regarding this Privacy Policy should be reported by email to [iskraindex@gmail.com](mailto:iskraindex@gmail.com) or by phone: +7(778)4042574.