Contents

1. GENERAL PROVISIONS 3
2. KEY DEFINITIONS 3
3. PRINCIPLE OF ALLOCATION OF RESPONSIBILITY 4
4. PURPOSES AND LEGAL GROUNDS FOR PROCESSING PERSONAL DATA 4
5. SCOPE OF PERSONAL DATA PROCESSED 5
6. CONDITIONS FOR TRANSFERRING PERSONAL DATA 6
7. OBLIGATIONS AND LIABILITY OF THE USER 7
8. PERSONAL DATA PROTECTION MEASURES 7
9. RIGHTS OF THE PERSONAL DATA SUBJECT REGARDING PERSONAL DATA 8
10. DISPUTE RESOLUTION PROCEDURE 8
11. FINAL PROVISIONS 9

1. GENERAL PROVISIONS

1.1. This Privacy Policy *(hereinafter referred to as the Policy)* has been developed by JSC «Astana Innovations» *(hereinafter referred to as the Operator)* in compliance with the requirements of Law No. 94-V of the Republic of Kazakhstan dated May 21, 2013, «On Personal Data and Their Protection» *(hereinafter referred to as the Law)*, and establishes the procedure for processing the personal data of Users of the Astana.kz Unified Digital Portal *(hereinafter referred to as the Portal)*.

1.2. The Operator ensures the technical operation of the Portal, including the organization of information exchange between Users and government authorities, organizations and other service providers (hereinafter referred to as Service Providers), and processes personal data to the extent necessary to perform these functions.

1.3. Service Providers independently determine the purposes, legal grounds, categories and scope of personal data required to provide the relevant services, unless otherwise provided by the legislation of the Republic of Kazakhstan or the terms of information exchange.

Service Providers are independently responsible for the lawfulness of personal data processing performed in their own information systems, as well as for the content, time limits and outcomes of the relevant services.

The Operator does not determine the content of public or other services, does not make substantive decisions on Users' applications and is not liable for acts or omissions of Service Providers unrelated to the operation of the Portal.

1.4. Individual Portal functions involving the collection and/or processing of personal data may be used subject to the relevant consent of the Personal Data Subject in cases where such consent is required by the legislation of the Republic of Kazakhstan.

The provisions of this Policy apply to the User insofar as the User uses the Portal and do not replace separate consent to the collection and/or processing of personal data where the legislation of the Republic of Kazakhstan requires such consent.

1.5. The Operator may amend or supplement this Policy in connection with changes in the legislation of the Republic of Kazakhstan, the functionality of the Portal, personal data processing procedures or on other grounds.

The current version of the Policy is published on the Portal, indicating the date of its latest update. Where amendments affect the procedure for collecting and/or processing personal data and require separate consent from the Personal Data Subject, such consent shall be obtained in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

2. KEY DEFINITIONS

The following terms are used in this Policy:

— **Personal Data** — information relating to an identified or identifiable Personal Data Subject and recorded on electronic, paper and/or other physical media.

— **User** — an individual or legal entity accessing the Portal and using its functionality.

— **Personal Data Subject** — the individual to whom the relevant personal data relate.

— **Operator** — JSC «Astana Innovations», which collects and/or processes personal data within the Portal's information infrastructure to the extent of its functions.

— **Service Provider** — a government authority, organization or other legal entity providing a relevant service through the Portal and processing personal data in the course of its activities.

— **Third Party** — a person who is neither the Personal Data Subject nor the owner and/or operator, but who is connected with them or any of them through circumstances or legal relationships involving the collection, processing and protection of personal data.

— **Processing of Personal Data** — operations involving the accumulation, storage, alteration, supplementation, use, dissemination, anonymization, blocking and destruction of personal data.

3. PRINCIPLE OF ALLOCATION OF RESPONSIBILITY

3.1. The Operator collects and processes personal data solely within the scope of the functions required to operate the Portal, enable information exchange, identify and authenticate Users, process technical requests, ensure information security and perform other functions provided for by the legislation of the Republic of Kazakhstan.

3.2. When transferring personal data to a Service Provider through the Portal, the Operator ensures such transfer in accordance with the established procedure for information exchange and within the limits of the authority granted to it.

3.3. The Service Provider is independently responsible for the lawfulness of the collection and processing of personal data after receiving them in its own information system, including determining the purposes of processing, the list of required data, storage periods, access procedures and the results of their use.

3.4. The Operator is not responsible for the content, accuracy, time limits or outcomes of services provided by Service Providers, or for the processing of personal data carried out by Service Providers in their own information systems, provided that such processing is not performed by the Operator.

3.5. The limitations on the Operator's liability established by this Policy do not apply where the Operator breaches the requirements of the legislation of the Republic of Kazakhstan when processing personal data within its own information infrastructure.

4. PURPOSES AND LEGAL GROUNDS FOR PROCESSING PERSONAL DATA

4.1. The Operator processes Users' personal data solely for the following purposes necessary for the operation of the Portal:

— identifying and authenticating Users on the Portal and maintaining personal accounts;

— technically transferring personal data to Service Providers for the processing of Users' applications, submissions and requests;

— enabling the submission of applications, tracking of their status and receipt of notifications;

— ensuring the operation, security and stability of the Portal;

— maintaining anonymized technical statistics on the use of the Portal;

— complying with the requirements of the legislation of the Republic of Kazakhstan.

4.2. The legal grounds for the Operator's processing of personal data include consent granted by the Personal Data Subject in accordance with the procedure established by the legislation of the Republic of Kazakhstan, as well as other grounds provided for by that legislation that do not require separate consent.

Where, under the legislation of the Republic of Kazakhstan, access to personal data contained in digital objects of government authorities and/or state-owned legal entities is provided through the state service for controlling access to personal data, consent shall be granted and withdrawn through that state service in accordance with the established procedure.

4.3. Service Providers process personal data on the basis of their own legal grounds, determined independently of the Operator and governed by the legislation of the Republic of Kazakhstan as applicable to the activities of each particular Service Provider.

4.4. The Operator may use automated information technologies, including machine learning and artificial intelligence algorithms, to ensure the operation of the Portal, process submissions, search for and provide information, route requests, improve the quality of digital services and pursue other lawful purposes.

Any use of personal data in connection with such technologies shall be strictly limited to the purposes and scope of processing provided for by this Policy and the legislation of the Republic of Kazakhstan.

4.5. The Operator does not transfer personal data across national borders as part of the Portal's standard functionality.

5. SCOPE OF PERSONAL DATA PROCESSED

5.1. The Operator processes only the minimum amount of personal data necessary for the purposes of operating the Portal. The Operator does not collect or process excessive personal data.

5.2. The full list of personal data requested to obtain a particular service is determined independently by the Service Provider in accordance with the requirements of the legislation of the Republic of Kazakhstan and the technical

specifications of the Service Provider's information systems. Unless otherwise provided by legislation, determining the list of data required to provide a particular service falls within the competence of the relevant Service Provider.

5.3. For the identification and authentication of Users, the Operator processes data received through system integration solely to the extent necessary to perform the relevant technical functions. Authorized government authorities are responsible for the accuracy of data contained in government databases.

5.4. The Operator does not collect biometric data or other special categories of personal data as part of the Portal's standard functionality, except where such processing is expressly provided for by the legislation of the Republic of Kazakhstan and is necessary to implement the relevant functionality.

Where services available through the Portal involve the processing of such data by a Service Provider, the relevant processing shall be carried out by that Service Provider in accordance with the legislation of the Republic of Kazakhstan and the legal grounds established by it.

6. CONDITIONS FOR TRANSFERRING PERSONAL DATA

6.1. Personal data are transferred to a Service Provider to the extent necessary to provide the relevant service, provided that a legal ground for such transfer exists under the legislation of the Republic of Kazakhstan.

Where the legislation requires the consent of the Personal Data Subject, the transfer shall take place only after such consent has been obtained in accordance with the procedure prescribed by legislation.

6.2. Personal data are transferred to government authorities *(inquiry and investigative bodies, tax authorities and other authorized bodies)* only in the cases and according to the procedure expressly provided for by the legislation of the Republic of Kazakhstan. The Operator is not responsible for subsequent processing of personal data by those authorities.

6.3. Personal data are transferred to government information systems, including through information exchange with e-government, where an appropriate legal ground exists under the legislation of the Republic of Kazakhstan.

The owners and/or operators of the respective information systems are responsible for personal data processing within their information systems in accordance with the legislation of the Republic of Kazakhstan.

6.4. Where the Operator engages other persons to maintain and ensure the operation of the Portal, such persons may access personal data only to the extent necessary to perform the relevant functions and on the basis of a contract concluded with the Operator.

Such contract shall provide for obligations to comply with the requirements of the legislation of the Republic of Kazakhstan on personal data and their protection, maintain the confidentiality of personal data, implement necessary protective measures and bear responsibility for violations of the established requirements.

7. OBLIGATIONS AND LIABILITY OF THE USER

7.1. The User must:

— provide accurate, complete and up-to-date information where the User submits such information independently;

— keep their account credentials secure and not disclose them to third parties;

— immediately notify the Operator of any loss or compromise of their account or any suspected unauthorized use of it;

— comply with the legislation of the Republic of Kazakhstan and this Policy when using the Portal.

The User is responsible for the consequences of disclosing their account credentials to third parties, unless otherwise provided for by the legislation of the Republic of Kazakhstan or unless those consequences result from a security breach of the Portal's information infrastructure.

7.2. The User acknowledges and agrees that the Operator does not create or update information contained in government databases integrated with the Portal and is not responsible for its completeness, accuracy or currency, or for failures or unavailability of government information systems, unless those circumstances are caused by the Operator's acts or omissions.

8. PERSONAL DATA PROTECTION MEASURES

8.1. The Operator implements the necessary legal, organizational and technical measures to protect personal data processed within the Portal's infrastructure against unauthorized access, destruction, alteration and dissemination.

8.2. The Operator implements the legal, organizational and technical measures for the protection of personal data required by the legislation of the Republic of Kazakhstan. However, the Operator cannot guarantee the absence of all possible information security threats arising from actions or events beyond the Operator's reasonable control.

Where a personal data security incident is identified, the Operator takes the measures prescribed by legislation to contain the incident, remedy its consequences and prevent recurrence.

8.3. The Operator shall not be liable for a personal data security breach if such breach results exclusively from:

— acts or omissions of a User who has violated information security requirements;

— unlawful acts of third parties beyond the Operator's control, provided that the Operator has implemented the protective measures required by the legislation of the Republic of Kazakhstan;

— force majeure circumstances;

— incidents arising directly within the information systems of Service Providers or government authorities, except where the relevant incident is caused by the Operator's acts or omissions.

8.4. Personal data are stored within the Portal's infrastructure for the period necessary to achieve the processing purposes specified in Section 4 of this Policy, but no longer than the period established by the legislation of the Republic of Kazakhstan.

Once the purposes of processing have been achieved, personal data shall be destroyed or anonymized, unless otherwise provided for by the legislation of the Republic of Kazakhstan or where their retention is necessary to fulfill the Operator's statutory obligations or to protect its rights and legitimate interests in cases provided for by legislation.

9. RIGHTS OF THE PERSONAL DATA SUBJECT REGARDING PERSONAL DATA

9.1. The Personal Data Subject has the right to:

— obtain information concerning the fact, purposes, sources and methods of collection and processing of their personal data by the Operator in accordance with the procedure established by the Law;

— request correction, blocking or destruction of personal data in cases provided for by the Law;

— withdraw consent to the processing of personal data by the Operator, unless otherwise provided for by the legislation of the Republic of Kazakhstan. The Operator may nevertheless continue processing personal data where grounds provided for by the Law exist;

— file complaints with the authorized government authority responsible for personal data protection.

9.2. With respect to personal data processing by a Service Provider, the User may contact the relevant Service Provider directly, since the Operator does not determine the purposes or scope of personal data processing in the information systems of Service Providers.

9.3. The Operator reviews Users' submissions concerning the processing of personal data within the Portal's infrastructure within the time limits established by the Law. For submissions concerning the acts of Service Providers or government authorities, the Operator informs the User that they should contact the relevant organization.

10. DISPUTE RESOLUTION PROCEDURE

10.1. The User may submit questions and disputes relating to personal data processing by the Operator in writing to: 27 Seifullin Street, Astana, Republic of Kazakhstan, or by email to support@astana.kz.

10.2. The Operator reviews submissions and questions relating to personal data processing and provides a reasoned response within the time limit established by the legislation of the Republic of Kazakhstan for the respective type of submission, calculated from the date of receipt.

10.3. Disputes relating to the acts of Service Providers in processing Users' personal data shall be resolved with the relevant Service Provider in accordance

with the procedure established by the legislation of the Republic of Kazakhstan. The Operator shall not be liable for acts of Service Providers unrelated to the operation of the Portal.

10.4. Where a dispute cannot be resolved through pre-trial procedures, it shall be resolved in accordance with the procedure established by the legislation of the Republic of Kazakhstan.

11. FINAL PROVISIONS

11.1. For questions relating to personal data processing, the User may contact:

JSC «Astana Innovations»,
010000, Astana, Republic of Kazakhstan,
27 Seifullin Street,
email: support@astana.kz,
tel.: +7 (7172) 25-13-35.

11.2. This Policy shall be governed by the legislation of the Republic of Kazakhstan.

11.3. The invalidity of individual provisions of this Policy shall not render the Policy as a whole invalid.