

Personal Data Processing Policy

General Provisions

This Personal Data Processing Policy (the “Policy”) has been developed in accordance with the Law of the Republic of Kazakhstan dated May 21, 2013 No. 94-V “*On Personal Data and Their Protection*” and defines the procedures for personal data processing and measures to ensure the security of personal data implemented by **Private Company Freedom Cloud Holding** (hereinafter — the “Company”).

The Company considers compliance with the rights and freedoms of individuals and citizens when processing personal data, including protection of the right to privacy and personal and family confidentiality, to be a fundamental principle and essential condition of its operations.

1. Company Information

Private Company “Freedom Cloud Holding”

Legal Address: 33/1 Mangilik El Avenue, Yesil District, Astana, 010000, Republic of Kazakhstan

Business Identification Number (BIN): 230940900333

Bank: JSC “Freedom Bank Kazakhstan”

Bank Identifier Code (BIC): KSNVKZKA

KBE: 17

IBAN: KZ92551Z600004181652 (KZT)

2. Purpose of Personal Data Processing

The Company processes personal data for the following purposes:

- 2.1. Fulfillment of obligations to users;
- 2.2. Improvement of service quality;
- 2.3. Prevention of fraud and ensuring data security.

3. Legal Basis for Personal Data Processing

The Company processes personal data only when such data is voluntarily provided by the User through forms available on the website:

<https://fch.kz/>

By completing the relevant forms and/or submitting personal data, the User confirms consent to the processing of personal data in accordance with this Policy.

4. Categories of Personal Data Processed

The Company may process the following personal data of the User:

- First name and last name
- Email address
- Contact details
- Service usage data
- IP addresses, cookies, and other technical data

5. Collection, Storage, Transfer, and Processing of Personal Data

The security of personal data processed by the Company is ensured through the implementation of legal, organizational, and technical measures necessary to fully comply with applicable personal data protection legislation.

The Company ensures the confidentiality and protection of personal data and takes all reasonable measures to prevent unauthorized access.

Personal data shall not be disclosed to third parties under any circumstances, except as required by applicable legislation of the Republic of Kazakhstan.

The retention period for personal data is unlimited.

The User may withdraw consent to personal data processing at any time by submitting a written notification to the Company.

6. Cross-Border Transfer of Personal Data

Prior to the cross-border transfer of personal data, the Company shall ensure that the foreign country receiving the personal data provides adequate protection of the rights of personal data subjects.

Cross-border transfer of personal data to countries that do not provide adequate protection may only be carried out with:

- written consent of the personal data subject; and/or
- execution of a contract to which the personal data subject is a party.

7. Final Provisions

Users may request clarification on any matters related to the processing of their personal data by contacting the Company.

The Company reserves the right to amend this Policy.

The updated version of the Policy shall enter into force upon publication on the Company's website.