

PRIVACY POLICY OF AETIS

PREAMBLE

This Privacy Policy of personal data (hereinafter referred to as the "**Privacy Policy**") has been developed in accordance with the legislation of the Republic of Kazakhstan in the field of personal data, adopted by the Limited Liability Partnership "IPCA" (BIN: 240640004082; address: 050040, Almaty, Al-Farabi Avenue, 53 B) (hereinafter referred to as LLP "IPCA", or "**IPCA**", or "**Operator**") and applies to all information that **LLP "IPCA"** may collect and/or receive about the subject of personal data who visits and/or uses the Website (<https://aetis.kz>) or interacts with LLP "IPCA" by any available digital and non-digital means. In addition, this Privacy Policy also applies to information about the subject of personal data that, in certain cases, LLP "IPCA" has the right to receive from open and publicly accessible sources and/or from third parties; as well as to information that, in certain cases, may be obtained by LLP "IPCA" as part of the direct processing of information already lawfully available to it about the subject of personal data.

This Privacy Policy reflects the strategy of LLP "IPCA" as an operator processing personal data, regarding the collection and/or receipt, processing, storage, and protection of personal data. This Privacy Policy defines the goals, content, and procedure for the collection and/or receipt, processing, and storage of personal data; measures aimed at protecting personal data; procedures aimed at preventing, detecting, and preventing violations of the legislation of the Republic of Kazakhstan in the field of personal data by LLP "IPCA" as an operator processing personal data.

This Privacy Policy applies to all internet sites, domains, and subdomains, applications, services, products, subscriptions, etc. owned by LLP "IPCA" and its subsidiaries.

1. TERMS AND DEFINITIONS

1.1 Within and for the purposes of this Privacy Policy, in addition to the terms and definitions directly related to the issues of processing and protection of personal data reflected in the provisions of this section of the Privacy Policy, the terms and definitions presented in the User Agreement of the site nris.ru, publicly available in the information and telecommunications network "Internet" on the official website of LLP "IPCA" at the following address: https://en.aetis.kz/documents/kz/terms_of_use_en.pdf (hereinafter referred to as the "**User Agreement**") are used.

In the event that terms and definitions written with capital letters are encountered in the text of this Privacy Policy, the interpretation of which is not provided in the provisions of this section of the Privacy Policy or not directly given in the text (in the place where such terms and definitions are first encountered) of this Privacy Policy, the corresponding terms and definitions shall be interpreted and understood in accordance with the User Agreement.

1.2. The following main terms and definitions directly related to the issues of processing and protection of personal data are used within and for the purposes of this Privacy Policy:

1.2.1. Automated Processing of Personal Data – the processing of personal data using computer technology.

1.2.2. Blocking of Personal Data – temporary suspension of the processing of personal data (except in cases where processing is necessary to clarify personal data).

1.2.3. Law of the Republic of Kazakhstan on Personal Data and Their Protection – dated May 21, 2013, No. 94-V "On Personal Data and Their Protection" and other regulatory legal acts that determine specific cases and features of processing personal data.

1.2.4. Information System of Personal Data – a set of personal data contained in databases and information technologies and technical means ensuring their processing.

1.2.5. Depersonalization of Personal Data – actions aimed at the collection, storage, modification, supplementation, use, dissemination, anonymization, blocking, and destruction of personal data.

1.2.6. Processing of Personal Data – any action (operation) or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

1.2.7. Personal Data Operator (Operator) – Limited Liability Partnership "IPCA" (LLP "IPCA") – BIN: 240640004082; – a legal entity established in accordance with the legislation of the Republic of Kazakhstan and registered at the address: 050040, Almaty, Al-Farabi Avenue, 53B, – independently or jointly with other entities, organizing and (or) carrying out the collection, processing, and protection of personal data, as well as determining the purposes of processing personal data, the composition (categories) of personal data to be processed, and the actions (operations) performed with personal data.

The terms "Personal Data Operator" and LLP "IPCA" or "IPCA" are used and should be interpreted within and for the purposes of this Privacy Policy as equivalent.

1.2.8. Personal Data – Information relating to a specific or identifiable data subject, recorded on electronic, paper, and (or) other tangible media.

1.2.9. Provision of Personal Data – actions aimed at disclosing personal data to a specific person or a specific circle of persons.

1.2.10. Distribution of Personal Data – actions resulting in the transfer of personal data, including through the media or by providing access to personal data in any other way.

1.2.11. Transborder Transfer of Personal Data – the transfer of personal data to the territory of a foreign state, to a foreign state authority, a foreign individual, or a foreign legal entity.

1.2.12. Technologies (Cookies) Files – small text files that are transmitted to the browser of the subject of personal data and stored on the equipment of the subject of personal data: the source of the entry to the Site; IP and MAC addresses; browser identifier – Client ID, browser version; location information (geolocation data); device type; information about the device's operating system; screen resolution; interface language, etc.; session parameters, including the date and time of access to the Site; information about user actions on the Site, including user clicks, addresses of requested pages, page views; data characterizing audience segments, including the use of metric programs Yandex.Metrika, Google Analytics, PowerBI, myBI, 1C-Bitrix24. Information about the use of the Site will be saved in the Cookie file and extracted from it during subsequent visits to the Site by the subject of personal data, which will allow the Operator to identify the subject of personal data during their further visits to the Site and personalize the services provided by the Operator on the Site to the specific needs of the subject of personal data.

1.2.13. Destruction of Personal Data – actions that make it impossible to restore personal data.

2. PRINCIPLES AND CONDITIONS (LEGAL GROUNDS) OF PERSONAL DATA PROCESSING

2.1. The processing of personal data by the Operator is carried out in compliance with the following principles:

2.1.1. The processing of personal data must be carried out on a lawful and fair basis.

2.1.2. The processing of personal data should be limited to achieving specific, predetermined and legitimate goals. Processing of personal data incompatible with the purposes of personal data collection is not allowed.

2.1.3. It is not allowed to combine databases containing personal data, the processing of which is carried out for purposes incompatible with each other.

2.1.4. Only personal data that meets the purposes of their processing is subject to processing.

2.1.5. The content and volume of the processed personal data must correspond to the stated purposes of processing. The processed personal data should not be redundant in relation to the stated purposes of their processing.

2.1.6. When processing personal data, the accuracy of personal data, their sufficiency, and, if necessary, relevance to the purposes of personal data processing must be ensured. The Operator must take the necessary measures or ensure that they are taken to delete or clarify incomplete or inaccurate data.

2.1.7. The storage of personal data must be carried out in a form that allows you to identify the subject of personal data, no longer than the purposes of personal data processing require, unless the period of storage of personal data is established by law, an agreement to which the subject of personal data is a party, beneficiary or guarantor. The processed personal data is subject to destruction or depersonalization upon achievement of the processing goals or in case of loss of the need to achieve these goals, unless otherwise provided by law

2.2. The processing of personal data may be carried out if the Operator has at least one of the following grounds:

2.2.1. With the consent of the personal data subject to the processing of his personal data; and (or)

2.2.2. If there are contracts concluded between the Operator and the subjects of personal data; as well as contracts concluded by the Operator, the beneficiary of which is (will be) the subject of personal data; and (or)

2.2.3. If the Operator needs to comply with and fulfill the obligations stipulated by the legislation of the Republic of Kazakhstan (for example, the Civil Code of the Republic of Kazakhstan; the Tax Code of the Republic of Kazakhstan; the Law of the Republic of Kazakhstan dated April 22, 1998 No. 220-I "On Limited and Additional Liability Partnerships"; the Law of the Republic of Kazakhstan dated November 24, 2015 No. 418-V "On Informatization"; the Law of the Republic of Kazakhstan dated January 7, 2003 No. 370 "On Electronic Documents and Electronic Digital Signatures"; and (or)

2.2.4. If the Operator has a need to exercise the rights and legitimate interests of the Operator or third parties (the corresponding need may arise, for example, from the Operator's Charter, other local acts of the Operator, etc.); and (or)

2.2.5 If there are other grounds provided for by the legislation of the Republic of Kazakhstan in the field of personal data.

3. CATEGORIES OF PERSONAL DATA SUBJECTS

In accordance with this Privacy Policy, personal data of the following categories of personal data subjects are collected and / or received and processed:

3.1. Site Users; and (or)

3.2. Representatives of Site Users; and (or)

3.3. Site Visitors; and (or)

3.4 Representatives Site's User Profiles.

4. PURPOSES OF COLLECTING AND (OR) RECEIVING AND PROCESSING PERSONAL DATA

The collection and (or) receiving and processing of personal data specified in Section 5 of this Privacy Policy is carried out for the purposes of:

4.1. Carrying out activities provided by the Operator's Charter (provision of paid and free services, maintaining and updating the Register, studying intellectual property markets, etc.);

4.2. Providing data subjects access to the Site and (or) its functionality (allowing them to assert their rights as authors and (or) rights holders of intellectual property and to monitor its use, etc.);

- 4.3. Registering, identifying, authenticating, and authorizing data subjects on the Site;
 - 4.4. Entering into, performing, and terminating civil law contracts with data subjects or, in cases provided by the legislation of the Republic of Kazakhstan and (or) the Operator's Charter, with other persons;
 - 4.5. Communicating with data subjects when necessary, including sending notifications, information, and requests related to the provision of the Operator's services, as well as processing statements, applications, requests, and other messages from data subjects;
 - 4.6. Complying with legal requirements by the Operator;
 - 4.7. Exercising and fulfilling the rights and obligations imposed on the Operator by contracts (including for the performance of a contract to which the data subject is a party, beneficiary, or guarantor, and also for concluding a contract at the initiative of the data subject or a contract under which the data subject will be a beneficiary or guarantor);
 - 4.8. Exercising the rights and legitimate interests of the Operator or third parties;
 - 4.9. Controlling the use of services and products presented by the Operator on the Site;
 - 4.10. Improving the Site's performance, enhancing its functionality, and increasing the quality of services provided by the Operator;
 - 4.11. Determining the preferences of the data subject;
 - 4.12. Conducting settlements with data subjects;
 - 4.13. Providing targeted information to the data subject about the Operator's and its partners' services and offerings;
 - 4.14. Targeting advertising materials;
 - 4.15. Ensuring the security of the Site and preventing fraud;
 - 4.16. Promoting services in the market through direct contacts with data subjects (via communication means);
 - 4.17. Conducting statistical and other research based on anonymized personal data of data subjects.
- The categories of data subjects, the list of personal data, as well as the category of personal data for each purpose, are specified in Appendix No. 2 to this Privacy Policy.

5. CATEGORIES OF COLLECTED, RECEIVED, AND PROCESSED PERSONAL DATA

5.1. For the purposes specified in Section 4 of this Privacy Policy, the Operator collects and (or) receives and processes the following categories of personal data related to the data subjects mentioned in Section 3 of this Privacy Policy:

- 5.1.1. Surname, first name, patronymic (including previous names);
- 5.1.2. Date of birth (day, month, year);
- 5.1.3. Place of birth;
- 5.1.4. Residential (registration) or current address;

5.1.5. Citizenship;

5.1.6. Name, type, series, number of the identity document, name of the issuing authority, date of issue of the document;

5.1.7. Scanned copies of the identity card, passport pages, or other identity documents;

5.1.8. Contact phone number;

5.1.9. Email address;

5.1.10. Information about intellectual property objects uploaded to the Site for depository purposes: information about the author(s) of the intellectual activity result, the result of intellectual activity, including its type, name, creation date, description, registration (archive) number, information on the depository term and type (material carrier or electronic format);

5.1.11. Information about ordered, canceled, paid, and unpaid services (via the Site and (or) its functionalities);

5.1.12. Information about payments made for services processed (via the Site and (or) its functionalities): amount, method, date, currency of payment; information on failed payments; information on full or partial refunds of paid amounts; information on chargeback procedures, etc.;

5.1.13. Cookies technology.

5.2. The Operator does not collect, receive, or process special categories of personal data and (or) biometric personal data of data subjects not specified in Section 3 of this Privacy Policy.

6. PROCEDURE FOR COLLECTING, RECEIVING, AND PROCESSING PERSONAL DATA. ENSURING THE SECURITY OF PERSONAL DATA

6.1. The collection, receipt, and processing of personal data are carried out exclusively in cases and in the manner provided for by this Privacy Policy and the legislation of the Republic of Kazakhstan on personal data.

6.2. It is prohibited to request personal data from data subjects and third parties, as well as to process personal data in cases not provided for by this Privacy Policy and the legislation of the Republic of Kazakhstan on personal data and their protection.

6.3. The processing of personal data of the categories of data subjects specified in Section 3 of this Privacy Policy includes the following actions: collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), anonymization, blocking, deletion, destruction of personal data.

6.4. The collection of the categories of personal data of data subjects specified in Subparagraphs 5.1.1 to 5.1.13 of this Privacy Policy, whose categories are indicated in Section 3 of this Privacy Policy, is carried out mainly by filling in the appropriate electronic forms provided on the Site by the respective data subjects.

6.5. The collection of the categories of personal data of data subjects specified in Subparagraph 5.1.14 of this Privacy Policy, whose categories are indicated in Section 3 of this Privacy Policy, is carried out using Cookies technology and (or) other similar technologies by the Operator.

6.6. The receipt by the Operator of the categories of personal data of data subjects specified in Section 5 of this Privacy Policy, whose categories are indicated in Section 3 of this Privacy Policy, from a person who is not a data subject, is permitted if such a person provides confirmation to the Operator of having grounds specified in the Law of the Republic of Kazakhstan dated May 21, 2013 No. 94-V "On Personal Data and Their Protection."

6.7. The processing of the categories of personal data of data subjects specified in Section 5 of this Privacy Policy, whose categories are indicated in Section 3 of this Privacy Policy, for the purposes defined in Section 4 of this Privacy Policy, is carried out if the Operator has at least one legal basis permitting such processing, from among the grounds provided in Section 2 of this Privacy Policy and (or) the legislation of the Republic of Kazakhstan on personal data and their protection.

6.8. In cases where the processing of the categories of personal data of data subjects specified in Section 5 of this Privacy Policy, whose categories are indicated in Section 3 of this Privacy Policy, for the purposes defined in Section 4 of this Privacy Policy is possible only with the written consent of the respective data subjects due to direct legal requirements, the Operator undertakes to process such data only upon obtaining the corresponding written consent from the data subject.

6.9. The processing of personal data obtained through the use of Cookies and other similar technologies is carried out in the cases and manner provided by the provisions of this section.

6.9.1. When visiting and using the Site by a data subject, the Operator collects information about the data subject and their technical devices using Cookies technology and (or) other similar technologies: the source of entry to the Site; IP and MAC addresses; browser identifier - Client ID, browser version; geolocation data; device type; information about the device's operating system; screen resolution; interface language, etc.; session parameters, including date and time of access to the Site; information about user actions on the Site, including user clicks, addresses of requested pages, page views, and impressions; data characterizing audience segments, including using metric programs such as Yandex.Metrika, Google Analytics, PowerBI, myBI, 1C-Bitrix24, and processes it for the purposes specified in Subparagraph 6.9.2 of this Privacy Policy and in accordance with the conditions of this Privacy Policy.

6.9.2. The information specified in Subparagraph 6.9.1 of this Privacy Policy is processed by the Operator for the purpose of:

- Controlling the use of services and products presented by the Operator on the Site;
- Improving the operation of the Site, enhancing its functionality, and increasing the quality of services provided by the Operator;
- Determining the preferences of the data subject;
- Providing targeted information about the Operator's and its partners' services;
- Targeting advertising materials;
- Ensuring the security of the Site and preventing fraud;
- Conducting statistical and other research based on anonymized personal data of data subjects.

6.9.3. The data subject can manage Cookies independently, restrict, or prohibit their use via browser settings. Among other types of Cookies, the Operator uses session Cookies, which are automatically deleted when the data subject leaves the Site. Cookies stored on the data subject's equipment do not harm the equipment and do not contain viruses.

6.9.4 If the data subject does not wish to provide the information specified in Subparagraph 6.9.1 of this Privacy Policy to the Operator, they must change the browser settings, specifically disable Cookies in the browser settings or stop using the Site. The data subject should be aware, recognize, and agree that in such a case, some sections and (or) functions of the Site may display and (or) work incorrectly.

6.10. The Operator has the right to verify the provided data, particularly those contained in the submitted documents, for compliance with the Operator's requirements (specifically, for eligibility to enter into transactions on the Site) and the legislation of the Republic of Kazakhstan.

6.11. The Operator may provide access to personal data and (or) transfer personal data to third parties in cases and in the manner provided for by the legislation of the Republic of Kazakhstan, this Privacy Policy, and other internal documents issued by the Operator in furtherance of this Privacy Policy, contracts to which the data subject is a party, beneficiary, or guarantor, and other agreements between the Operator and the data subject.

As part of achieving the purposes of personal data processing, the Operator may provide access to personal data and (or) transfer personal data to third parties, particularly the Operator's partners. The list of such parties is determined by the Operator in the relevant appendix to this Privacy Policy (Appendix No. 1), published on the Operator's Site, and available at the following link: https://en.aetis.kz/documents/kz/privacy_policy_en.pdf. The Operator updates the above list as necessary.

Third parties to whom the Operator provides access to personal data and (or) transfers personal data must comply with the principles and rules of personal data processing provided by the legislation of the Republic of Kazakhstan on personal data and their protection, particularly to maintain the confidentiality of personal data and ensure the security of personal data during their processing.

6.12. The Operator has the right to delegate the processing of personal data to another person with the consent of the data subject, unless otherwise provided by law, based on a contract concluded with this person (hereinafter referred to as the "Operator's Assignment"). The person processing personal data on behalf of the Operator must comply with the principles and rules of personal data processing provided by the legislation of the Republic of Kazakhstan on personal data and their protection. The Operator's Assignment must specify the list of actions (operations) with personal data to be performed by the person processing personal data and the purposes of processing, the obligation of such person to maintain the confidentiality of personal data and ensure the security of personal data during their processing, and the requirements for the protection of processed personal data in accordance with the legislation of the Republic of Kazakhstan on personal data and their protection.

The person processing personal data on behalf of the Operator is not required to obtain the consent of the data subject to process their personal data.

If the Operator delegates the processing of personal data to another person, the Operator remains responsible to the data subject for the actions of that person. If the Operator delegates the processing of personal data to another person, the Operator includes information about that person in the list of third parties provided in Paragraph 6.11 of this Privacy Policy.

6.13. The Operator guarantees the data subject adequate protection of personal data during processing. To this end, the Operator takes measures to ensure that the Operator fulfills the

obligations imposed on it by the legislation of the Republic of Kazakhstan on personal data and their protection. In particular, the Operator:

6.13.1. Develops, adopts, and publishes in open and free access on the Internet this Privacy Policy, which defines the Operator's policy regarding personal data processing;

6.13.2. Develops and adopts other internal documents on personal data processing issues in furtherance of the provisions of this Privacy Policy; as well as internal documents establishing procedures aimed at preventing and detecting violations of the legislation of the Republic of Kazakhstan on personal data and their protection, eliminating the consequences of such violations;

6.13.2. Appoints a person responsible for organizing the processing of personal data;

6.13.4 Conducts internal control and (or) audits for compliance with the processing of personal data legislation of the Republic of Kazakhstan on personal data and their protection, requirements for personal data protection, this Privacy Policy, and other internal documents issued by the Operator in furtherance of this Privacy Policy;

6.13.5. Assesses the harm that may be caused to data subjects in case of violation of the legislation of the Republic of Kazakhstan on personal data and their protection, correlates the mentioned harm with the measures taken by the Operator to ensure the fulfillment of obligations provided by the legislation of the Republic of Kazakhstan on personal data and their protection;

6.13.6 Familiarizes the Operator's employees who directly process personal data with the provisions of the legislation of the Republic of Kazakhstan on personal data and their protection, including personal data protection requirements, this Privacy Policy, other internal documents on personal data processing issues issued in furtherance of this Privacy Policy, and (or) trains such employees;

6.13.7 Applies legal, organizational, and technical measures to ensure the security of personal data from unauthorized or accidental access, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other unlawful actions regarding personal data. In particular, the Operator:

- Identifies threats to personal data security during processing in information systems of personal data;

- Applies organizational and technical measures to ensure the security of personal data during processing in information systems of personal data, necessary to meet the requirements for personal data protection established by the Government of the Republic of Kazakhstan: primarily, the Operator ensures access control to information systems processing personal data; prevents the introduction of malicious programs and software bookmarks into information systems processing personal data; applies firewalling to manage access, filter network packets, and translate network addresses to hide the structure of information systems processing personal data; conducts activities for monitoring and detecting intrusions into information systems processing personal data that violate or create preconditions for violating established requirements for ensuring personal data security; conducts analysis of the security of personal data information systems, including the use of specialized software tools, etc.;

- Uses information protection tools that have undergone conformity assessment procedures in the prescribed manner;

- Evaluates the effectiveness of measures taken to ensure personal data security before commissioning personal data information systems;
- Keeps records of machine media containing personal data;
- Detects unauthorized access to personal data and takes measures;
- Recovers personal data modified or destroyed due to unauthorized access;
- Establishes rules for access to personal data processed in personal data information systems, and ensures registration and accounting of all actions performed with personal data in personal data information systems;
- Provides access to personal data of the data subject only to authorized employees of the Operator;
- Monitors the measures taken to ensure the security of personal data and the protection level of personal data information systems.

6.14. In case of detecting violations of the procedure for processing personal data, the Operator promptly takes measures to eliminate the causes and consequences of such violations.

6.15. When collecting personal data, including via the Internet, the Operator records, systematizes, accumulates, stores, clarifies (updates, modifies), and extracts personal data of citizens of the Republic of Kazakhstan using databases located on the territory of the Republic of Kazakhstan.

6.16. Cross-border transfer of personal data by the Operator is not carried out.

7. TERMS OF PROCESSING AND STORAGE OF PERSONAL DATA

7.1. The processing and storage of personal data of the subject of personal data in a form that allows identifying such a subject of personal data are carried out by the Operator solely until it is necessary to achieve the purposes of processing personal data specified in Section 4 of this Privacy Policy.

At the same time, in cases explicitly established by the legislation of the Republic of Kazakhstan, this Privacy Policy, other local acts of the Operator issued in the development of this Privacy Policy, contracts in which the subject of personal data is a party, a beneficiary, or a guarantor, and other agreements between the Operator and the subject of personal data, the Operator may be entitled to process and store the personal data of the subject of personal data in a form that allows identifying such a subject of personal data after achieving the purposes of processing personal data specified in Section 4 of this Privacy Policy for the period established by such legislation of the Republic of Kazakhstan, this Privacy Policy, other local acts of the Operator issued in the development of this Privacy Policy, contracts in which the subject of personal data is a party, a beneficiary, or a guarantor, and other agreements between the Operator and the subject of personal data.

7.2. Upon achieving the purpose of processing personal data, the Operator ceases processing personal data.

7.3. In the event that the subject of personal data withdraws their consent to the processing of personal data, the Operator ceases processing within a period not exceeding thirty days from the date of receipt of the withdrawal, except in cases where the Operator is entitled to continue

processing personal data without the consent of the subject of personal data on the grounds specified in the Law "On Personal Data and Their Protection."

7.3.1. Upon achieving the purposes of processing personal data, losing the necessity to achieve the purposes of processing, expiration of the consent period, or withdrawal of consent by the subject of personal data for the processing of their personal data, as well as in the case of detecting unlawful processing of personal data, such personal data must be destroyed unless otherwise provided by the legislation of the Republic of Kazakhstan, this Privacy Policy, other local acts of the Operator issued in the development of this Privacy Policy, a contract in which the subject of personal data is a party, a beneficiary, or a guarantor, and other agreements between the Operator and the subject of personal data.

7.3.2. The Operator systematically controls and determines the categories of personal data subject to destruction due to the lack of legal grounds for processing and storing the relevant categories of personal data.

7.3.3. The procedure and process for destroying personal data are determined by the Operator in accordance with the legislation of the Republic of Kazakhstan and the local acts of the Operator adopted in the development of this Privacy Policy.

8. RIGHTS AND OBLIGATIONS OF THE OPERATOR

8.1. The Operator undertakes to:

8.1.1. Organize the processing of personal data in accordance with the requirements of the legislation of the Republic of Kazakhstan in the field of personal data and their protection;

8.1.2. Ensure the confidentiality of personal data: The Operator, who has gained access to personal data, is obliged not to disclose or distribute personal data to third parties without the consent of the subject of personal data, unless otherwise provided by the legislation of the Republic of Kazakhstan in the field of personal data and their protection;

8.1.3. Ensure the protection of personal data processed by the Operator from unauthorized use or loss;

8.1.4. Provide, as provided by the legislation of the Republic of Kazakhstan in the field of personal data and their protection, the subject of personal data or their representative with information about the presence of personal data related to the corresponding subject of personal data, and also provide the opportunity to familiarize themselves with these personal data;

8.1.5. Timely and in accordance with the requirements of the legislation of the Republic of Kazakhstan in the field of personal data and their protection respond to requests and inquiries from subjects of personal data and their legal representatives;

8.1.6. In case of refusal, when contacted by the subject of personal data or their representative, to provide the subject of personal data with their personal data or information about the presence of their personal data with the Operator, provide a written motivated response containing a reference to the provision of the law, which is the basis for such refusal;

8.1.7. If the provision of personal data is mandatory in accordance with the legislation of the Republic of Kazakhstan in the field of personal data and their protection, the Operator is obliged to explain to the subject of personal data the legal consequences of refusing to provide their personal data;

8.1.8. Provide the subject of personal data or their representative the opportunity to familiarize themselves with the personal data related to this subject of personal data free of charge, as well as, at the request of the subject of personal data or their representative, make the necessary changes and destroy them if they are not necessary for the stated purpose of processing, and take reasonable measures to notify third parties about changes in personal data to which the personal data of this subject were transferred;

8.1.9. Provide the necessary information to the authorized body for the protection of the rights of the subject of personal data upon request of this body within thirty days from the date of receipt of such a request;

8.1.10. Immediately cease the processing of the personal data of the subject upon their request for the purpose of promoting goods, works, and services on the market through direct contact with the potential consumer using communication means;

8.1.11. Eliminate violations of the law made during the processing of personal data;

8.1.12. Clarify, block, and destroy personal data in cases provided for by the legislation of the Republic of Kazakhstan in the field of personal data and their protection;

8.1.13. Perform other duties provided by this Policy and the legislation of the Republic of Kazakhstan in the field of personal data and their protection.

8.2. The Operator has the right to:

8.2.1. Adopt local acts in the development of this Privacy Policy;

8.2.2. Offer the subject of personal data to formalize personal consent for the processing of personal data;

8.2.3. Refuse to provide personal data in cases provided for by the legislation of the Republic of Kazakhstan in the field of personal data and their protection;

8.2.4. Hold the Operator's employees accountable for violating the requirements for the protection of personal data;

8.2.5. Exercise other rights provided by this Privacy Policy and the legislation of the Republic of Kazakhstan in the field of personal data and their protection.

9. RIGHTS OF THE SUBJECT OF PERSONAL DATA

9.1. To receive, in cases and procedures provided by the legislation of the Republic of Kazakhstan in the field of personal data and their protection, information concerning the processing of their personal data by the Operator, including information about the sources of their receipt;

9.2. To demand the blocking or destruction of their personal data if the personal data are incomplete, outdated, illegally obtained, or are not necessary for the stated purpose of processing;

9.3. To appeal to the authorized body for the protection of the rights of subjects of personal data or to the court against the actions or inactions of the Operator if the subject of personal data believes that the Operator is processing their personal data in violation of the requirements of the legislation of the Republic of Kazakhstan in the field of personal data and their protection or otherwise violates their rights and freedoms;

9.4. To give their consent to the Operator for the processing of their personal data;

9.5. To withdraw their consent to the processing of personal data. The subject of personal data has the right to withdraw their consent to the processing of personal data by:

9.5.1. Sending a written withdrawal by postal mail to the Operator at the address: 050040, Almaty, Al-Farabi Avenue 53B. The withdrawal is considered received by the Operator from the moment of delivery (handing over) of the corresponding postal item to the Operator.

The written withdrawal must include (in addition to the actual withdrawal) the surname, name, patronymic, address of the subject of personal data, the number of the main identity document, information about the date of issue of the specified document and the issuing authority; the address of the operator receiving the withdrawal of the subject of personal data, the signature of the subject of personal data.

9.5.2. Sending a withdrawal using the information technologies and technical means of the Site (if the corresponding technical capability is available on the Site);

9.6. To give their consent to the processing of personal data for the purpose of promoting goods, works, and services on the market through direct contact with the subject of personal data (potential consumer) using communication means;

9.7. To demand the cessation of the processing of personal data for the purpose of promoting goods, works, and services on the market through direct contact with the subject of personal data (potential consumer) using communication means. The subject of personal data sends the demand for cessation of the processing of personal data to the Operator in the ways provided for the withdrawal of consent to the processing of personal data and specified in paragraph 9.5 of this Privacy Policy;

9.8. To protect their rights and legitimate interests, including by filing claims for damages and/or compensation for moral harm in court;

9.9. To exercise other rights of the subject of personal data provided by this Privacy Policy and the legislation of the Republic of Kazakhstan in the field of personal data and their protection.

10. CONSIDERATION OF REQUESTS FROM SUBJECTS OF PERSONAL DATA

10.1. Subjects of personal data, in cases and procedures provided by the legislation of the Republic of Kazakhstan in the field of personal data and their protection, have the right to receive information concerning the processing of their personal data by the Operator, including:

10.1.1. Confirmation of the fact of processing personal data by the Operator;

10.1.2. Legal grounds and purposes of processing personal data;

10.1.3. Methods of processing personal data used by the Operator;

10.1.4. Name and location of the Operator, information about persons who have access to personal data or to whom personal data may be disclosed on the basis of a contract with the Operator or on the basis of law;

10.1.5. Processed personal data related to the corresponding subject of personal data, the source of their receipt;

10.1.6. Terms of processing personal data, including terms of their storage by the Operator;

10.1.7. The procedure for the subject of personal data to exercise their rights provided by the legislation of the Republic of Kazakhstan in the field of personal data and their protection;

10.1.8. Information on the carried out or proposed cross-border transfer of data;

10.1.9. Name of the organization or the surname, name, patronymic, and address of the person processing personal data on behalf of the Operator if the processing is entrusted or will be entrusted to such an organization or person;

10.1.10. Other information provided by the legislation of the Republic of Kazakhstan in the field of personal data and their protection.

10.2. Subjects of personal data have the right to demand the Operator to clarify their personal data, block, or destroy them if the personal data are incomplete, outdated, inaccurate, illegally obtained, or are not necessary for the stated purpose of processing, as well as to take measures provided by law to protect their rights.

10.3. The information specified in subparagraphs 10.1.1 - 10.1.10 of this Privacy Policy must be provided to the subject of personal data by the Operator in an accessible form, and it should not contain personal data related to other subjects of personal data, except in cases where there are legal grounds for disclosing such personal data.

10.4. The information specified in paragraphs 10.1.1 - 10.1.10 of this Privacy Policy is provided to the subject of personal data or their representative by an authorized person of the Operator processing the relevant personal data upon request or upon receipt of a request from the subject of personal data or their representative. The request must contain:

10.4.1. The number of the main identity document of the subject of personal data or their representative, information about the date of issue of the specified document and the issuing authority;

10.4.2. Information confirming the participation of the subject of personal data in relations with the Operator or information otherwise confirming the fact of processing personal data by the Operator, the signature of the subject of personal data or their representative.

10.5. In the event that the information specified in subparagraphs 10.1.1 - 10.1.10 of this Privacy Policy and the processed personal data were provided for familiarization to the subject of personal data at their request, the subject of personal data has the right to reapply to the Operator or send a repeat request to obtain the specified information and familiarize themselves with such personal data no earlier than 30 (thirty) days after the initial request or the sending of the initial request, unless a shorter period is established by law, a normative legal act adopted in accordance with it, or a contract in which the subject of personal data is a party, a beneficiary, or a guarantor.

10.6. The subject of personal data has the right to reapply to the Operator or send a repeat request to obtain the information specified in subparagraphs 10.1.1 - 10.1.10 of this Privacy Policy, as well as to familiarize themselves with the processed personal data before the expiration of the period specified in paragraph 10.5 of this Privacy Policy if such information and/or processed personal data were not provided to them for familiarization in full as a result of the consideration of the initial request. The repeat request, along with the information specified in 10.4 of this Privacy Policy, must contain a justification for sending the repeat request.

10.7. The Operator has the right to refuse the subject of personal data in fulfilling the repeat request that does not meet the conditions provided for in paragraphs 10.5 and 10.6 of this Privacy Policy. Such a refusal must be motivated.

10.8. The right of the subject of personal data to access their personal data may be limited in accordance with the laws, including if the access of the subject of personal data to their personal data violates the rights and legitimate interests of third parties.

11. FINAL PROVISIONS

11.1. This document defines the policy for processing personal data by the Limited Liability Partnership "IPCA" in relation to the categories of subjects of personal data specified in Section 3 of this Privacy Policy and is part of the local act of the Limited Liability Partnership "IPCA," which defines the policy for processing personal data by the Limited Liability Partnership "IPCA" in relation to all categories of subjects of personal data whose personal data is processed by the Limited Liability Partnership "IPCA" in the course of its business activities.

11.2. This Privacy Policy is a public document of the Operator. The current version of this Privacy Policy is always available for reading online, printing, or downloading to the personal

data subject's technical device in the special section of the Site – Privacy Policy (https://en.aetis.kz/documents/kz/privacy_policy_en.pdf).

11.3. This Privacy Policy is approved and put into effect by the Operator's order and is mandatory for execution by all employees of the Operator who have access to personal data.

11.4. This Privacy Policy is subject to change in the event of the adoption of regulatory legal acts establishing new requirements for the processing and protection of personal data or in the event of changes to existing regulatory legal acts. This Privacy Policy may also be amended by the Operator if the need to make appropriate changes is identified.

In doing so, the Operator undertakes and guarantees that the Operator will take reasonable and necessary measures to inform the subjects of personal data of the complete and clearly stated information about the changes and additions made to this Privacy Policy (including by sending the appropriate notifications to the personal data subjects in the personal account interface on the Site, to the email address of the personal data subject, etc.).

11.5. The information and documents containing personal data on the Site are not publicly available. The Operator and the Site do not create a publicly accessible source of personal data.

11.6. By registering on the Site and/or using it and/or the services provided on it, the subject of personal data acknowledges the fact that they thereby provide the Operator with their personal data (falling into one or another category specified in Section 5 of this Privacy Policy). In addition, the subject of personal data recognizes and confirms the possibility for the Operator to process (use) such personal data of the corresponding subject of personal data (including without obtaining the corresponding consent of the subject of personal data), due to the presence of other legal grounds for carrying out the corresponding processing, specified in subparagraphs 2.2.2 – 2.2.5 of this Privacy Policy, for the purposes specified in this Privacy Policy.

11.7. If the Operator needs to use the personal data of the subject of personal data for purposes not related to those presented in this Privacy Policy, the Operator undertakes and guarantees that such processing (use) will be carried out only if the Operator has the explicit consent of the corresponding subject of personal data or if the Operator has other legal grounds ensuring the possibility of their processing, and exclusively in accordance with the provisions of this Privacy Policy.

11.8. If, for any reason and at any stage of interaction with the Operator, visiting and/or using the Site and the services provided on it, the subject of personal data refuses to provide the Operator with any personal data (falling into one or another category specified in Section 5 of this Privacy Policy) related to such a subject of personal data, a situation may arise in which the Operator will not be able to provide such a subject of personal data with the possibility of using the Site and/or the services provided on it in full due to the absence of the necessary and sufficient information about the corresponding subject of personal data.

11.9. If, after familiarizing themselves with this Privacy Policy:

11.9.1. Some of its provisions remain unclear to the subject of personal data – such a subject of personal data can contact the Operator in any convenient way from those listed on the Site in the relevant section "Contacts" and/or "Hotline".

11.9.2. The subject of personal data does not agree in part or completely with this Privacy Policy and does not wish to provide any of their personal data (falling into one or another category specified in Section 5 of this Privacy Policy), thereby not only expressing their refusal to provide the Operator with their consent to the processing of personal data but also their unwillingness for the Operator to process any personal data of the corresponding subject of personal data on grounds not requiring the consent of the corresponding subject of personal data – such a subject of personal data needs to leave the Site without performing any actions on it (including actions to register on the Site, use the services provided on the Site, etc.).

11.10. In the event that, after familiarizing themselves with this Privacy Policy, the subject of personal data continues to visit the Site and/or use the services provided on it, the Operator, based on the principle of good faith, has the right to regard such actions of the corresponding subject of personal data (and in the absence of other actions by the corresponding subject of personal data indicating otherwise) as confirmation by such a subject of personal data of the following facts:

11.11. The subject of personal data has familiarized themselves with this Privacy Policy in good faith and in a timely manner (i.e., before starting to use the Site and the services provided on it); and

11.12. All provisions of this Privacy Policy are clear to such a subject of personal data and are not disputed by the corresponding subject either in full or in part; and

11.13. The subject of personal data acknowledges all provisions of this Privacy Policy as giving rise to the legal consequences specified in this Privacy Policy for the corresponding subject of personal data.

11.14. The control over the implementation of the requirements of this Policy is carried out by the person responsible for organizing the processing of personal data of the Operator.

11.15. Attached to this Policy:

11.15.1. Appendix No. 1. "List of third parties to whom the Operator may provide access and transfer personal data."

Appendix No. 2 to the Privacy Policy of IPCA

Goals	Categories of subjects	List of personal data	Categories of personal data
Registration on the AETIS website	Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users	Last name, first name, patronymic (including previous ones); Date (date, month, year) of birth; Place of birth; Address of the place of residence (registration) or place of stay; Citizenship; Name, type, series, number of the identity document, name of the issuing authority, date of issue of the document; Scanned copies of the identity card, passport pages, or other identity documents; Individual Identification Number (IIN); Contact phone number; Email address; Banking details; Cookies technology (files).	Common
Identification, authentication, authorization on the AETIS Website	Site Users, representatives of Site Users	Login; Password; Technologies (files) Cookies.	Common

<p>DEPOSIT SERVICE Provision of services within the framework of the Deposit Service, including:</p> <ul style="list-style-type: none"> • Conclusion of civil-law contracts; • Implementation and fulfillment of rights and obligations assigned to the Operator by contracts; • Sending notifications, information, and requests related to the provision of Operator services. 	<p>Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users</p>	<p>Last name, first name, patronymic (including previous ones); Date (date, month, year) of birth; Place of birth; Address of the place of residence (registration) or place of stay; Citizenship; Name, type, series, number of the identity document, name of the issuing authority, date of issue of the document; Scanned copies of the identity card, passport pages, or other identity documents; Individual Identification Number (IIN); Contact phone number; E-mail address (e-mail); Bank requisites; Technologies (files) Cookies; Information about intellectual property objects uploaded to the Site.</p>	<p>Common</p>
<p>SERVICE Anti-Piracy Provision of services within the framework of the Anti-Piracy Protection Service, including:</p> <ul style="list-style-type: none"> • entering into civil law contracts, • implementation and fulfillment of the rights and obligations assigned to the Operator by the contracts; • sending notifications, information, and requests related to the provision of the Operator's services. 	<p>Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users</p>	<p>Last name, first name, patronymic (including previous names); Date of birth (day, month, year); Place of birth; Residential address (registration) or place of stay; Citizenship; Name, type, series, and number of the identity document, name of the issuing authority, date of issue of the document; Scanned copies of the identity card, passport pages, or other identity documents; Individual Identification Number (IIN); Contact phone number; Email address; Bank details; Cookies (files); Information about intellectual property uploaded to the Website.</p>	<p>Common</p>

<p>SERVICE ISNI Provision of services within the framework of the Name and Pseudonym Registration Service, including:</p> <ul style="list-style-type: none"> entering into civil law contracts, implementation and fulfillment of the rights and obligations assigned to the Operator by the contracts; sending notifications, information, and requests related to the provision of the Operator's services. 	<p>Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users</p>	<p>Last name, first name, patronymic (including previous names); Date of birth (day, month, year); Place of birth; Residential address (registration) or place of stay; Citizenship; Name, type, series, and number of the identity document, name of the issuing authority, date of issue of the document; Scanned copies of the identity card, passport pages, or other identity documents; Individual Identification Number (IIN); Contact phone number; Email address; Bank details; Cookies (files); Information about intellectual property uploaded to the Website.</p>	<p>Common</p>
<p>SERVICE Art Cloud Provision of services within the framework of the Online Image Registration Service, including:</p> <ul style="list-style-type: none"> entering into civil law contracts; implementation and fulfillment of the rights and obligations assigned to the Operator by the contracts; sending notifications, information, and requests related to the provision of the Operator's services. 	<p>Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users</p>	<p>Last name, first name, patronymic (including previous names); Date of birth (day, month, year); Place of birth; Residential address (registration) or place of stay; Citizenship; Name, type, series, and number of the identity document, name of the issuing authority, date of issue of the document; Scanned copies of the identity card, passport pages, or other identity documents; Individual Identification Number (IIN); Contact phone number; Email address; Bank details; Cookies (files); Information about intellectual property uploaded to the Website.</p>	<p>Common</p>

<p>TRADEMARK REGISTRATION SERVICE Provision of services within the framework of the Trademark Registration Service, including:</p> <ul style="list-style-type: none"> entering into civil law contracts; implementation and fulfillment of the rights and obligations assigned to the Operator by the contracts; sending notifications, information, and requests related to the provision of the Operator's services. 	<p>Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users</p>	<p>Last name, first name, patronymic (including previous names); Date of birth (day, month, year); Place of birth; Residential address (registration) or place of stay; Citizenship; Name, type, series, and number of the identity document, name of the issuing authority, date of issue of the document; Scanned copies of the identity card, passport pages, or other identity documents; Individual Identification Number (IIN); Contact phone number; Email address; Bank details; Cookies (files); Information about intellectual property uploaded to the Website.</p>	<p>Common</p>
<p>processing applications, requests, inquiries, and other communications from personal data subjects</p>	<p>Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users</p>	<p>Last name, first name, patronymic (including previous names); Residential address (registration) or place of stay; Contact phone number; Email address.</p>	<p>Common</p>
<p>compliance by the Operator with legal requirements</p>	<p>Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users</p>	<p>to the extent necessary to achieve the purpose</p>	<p>Common</p>
<p>Exercise of the rights and legitimate interests of the Operator or third parties</p>	<p>Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users</p>	<p>to the extent necessary to achieve the purpose</p>	<p>Common</p>

Monitoring the use of services and products provided by the Operator on the Website	Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users	to the extent necessary to achieve the purpose	Common
Improving the operation of the Website, enhancing its functionality, and increasing the quality of services provided by the Operator	Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users	to the extent necessary to achieve the purpose	Common
Determining the preferences of the personal data subject	Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users	to the extent necessary to achieve the purpose	Common
Conducting settlements with personal data subjects	Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users	Surname, first name, patronymic; Bank details.	Common
Providing the personal data subject with targeted information about the Operator's services and products, as well as those of its partners	Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users	Contact phone number; Email address.	Common
Targeting of advertising materials	Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users	to the extent necessary to achieve the purpose	Common
Ensuring the security of the Website and preventing fraud	Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users	to the extent necessary to achieve the purpose	Common
Promoting services in the market through direct contacts with personal data subjects	Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users	Contact phone number; Email address.	Common

(using communication tools)			
Conducting statistical and other research based on anonymized personal data of personal data subjects	Site Visitors, representatives of Site Visitors, Site Users, representatives of Site Users	to the extent necessary to achieve the purpose	Common