

## Privacy Policy

This Privacy Policy, together with our Terms of Use and its other essential parts, governs Kazakhstan Newsline LLP collection, processing and use of your Personal Data.

Kazakhstan Newsline LLP and its Affiliates undertake to take maximum efforts in order to protect your privacy. Kazakhstan Newsline LLP uses the collected information about you to fulfill its contractual obligations and improve customer service.

Please read this document carefully in order to understand our approach and policy regarding your Personal Data and how we will use your Personal Data.

### 1. WHAT DATA WE COLLECT ABOUT YOU

We may collect and process the following data about you:

#### Information you give to us

You can provide us with information about yourself by filling in the relevant forms on the Website or by providing us such information by phone, email, during a video conference or in any other manner. This information includes Personal Data which was specified when registering on the Website and/or Silk Route News Application, when subscribing to our Service, as well as the payment instruments used by a person, when searching for a product, using any of Services provided by our Website and/or Silk Route News Application, and also when you tell us about problems or issues in the work of the Website and/or Silk Route News Application.

For example, the data that you provide to us, may include your:

- last name and first name;
- postal address;
- tax residency;
- phone number and email address;
- login information and nickname for accessing Kazakhstan Newsline LLP Platform and/or Silk Route News Application;
- bank details, including account numbers and payment details
- information on the status of your accounts opened with banks and/or payment systems;
- inquiries with Kazakhstan Newsline LLP support;
- location and log data information that is generated by your use of Kazakhstan Newsline LLP Platform and/or Silk Route News Application;
- Other personal information that may be required for proper rendering services.

Kazakhstan Newslines LLP does neither collect nor process sensitive personal Users' data, such as race or ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships, genetic or biometric data, health, sex life or sexual orientation information. However, we caution you that in case you disclose any information in social net platforms, it can be collected by persons or companies Kazakhstan Newslines LLP has no control over.

#### Information we collect about you

With regard to each of your visits to our Website and/or Silk Route News Application and use of our Services we can collect, for example, the following information about you (including automatic collection):

- technical information, including the internet protocol (IP) address used to connect your computer to the internet, your Account login information, your browser type and its version, time zone setting, browser plug-in types and versions, operating system and platform;
- information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our Website (including date and time); products and Services you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number;
- information about geo-location: we may collect information about real-time location based on information from your device at any time while you download or use our services; we may use this information to optimize your experience.

Your Personal Data, such as your email and nickname, that you provide to us during the registration at the Kazakhstan Newslines LLP Platform and/or Silk Route News Application is stored by us, regardless of whether your registration process is finished or not.

## 2. WHY WE USE YOUR PERSONAL DATA

We are going to use your Personal Data for the following purposes:

- Provision of our Services
- to fulfill the obligations under contracts signed with you, as well as to provide you with the information, products and Services that you requested;
- to ensure the security of our Website and Silk Route News Application, our Services, and your Account;

- for administration of our Website and Silk Route News Application and for internal operations, including troubleshooting, data analysis, testing, statistical data collection and for conducting surveys;
- to give you access to the interactive features of the Website in case you wish to use them;
- To support, respond and resolve your complaints and issues related to the use of our Services and the capabilities of our Website.

#### Informing you about our products and Services

- to notify you about other existing and/or new products and Services, similar to those products or Services that you already purchased or information that you searched for;
- To notify you about changes related to our products and Services.

#### Helping us improve our products and Services

- to improve our Website and to make sure that our content is most convenient for the operating system of your computer;
- to evaluate and understand the effectiveness of promotional materials that we provide to you and other Users, as well as to provide you with the necessary advertising information;
- to ensure the most effective presentation of the content of our Website to you and the use of it on your computer.

#### Safeguarding vested interests

- for risk management;
- for security and control of our IT systems, crime prevention;
- for measuring the use of our Services and products for its further development;
- for internal business and research purposes, i.e. communication with you regarding our products and Services;

#### Assuring legal procedures

- to respond to law enforcement requests;
- to initiate and/or respond to legal claims;
- to investigate and/or settle disputes with you.

#### Complying with legal regulations

- to verify and check the identity of Users who register with us in order to prevent fraud and associated illegal activities;

- to notify our Users about changes to policies and terms of use of Kazakhstan Newslines Website and/or Silk Route News Application.

#### Marketing and third parties

- to provide you with the information about new products or services introduced by Kazakhstan Newslines LLP or our third party providers, which in our opinion, might be of interest to you; if you are already a User, we will contact you via electronic means of communication (via email or SMS) to inform you about products or services similar to those that were subject of offers or promotions in the past; if you are a new User, we will request your consent to share your Personal Data with other service providers to offer products and services; if you do not want us to use your Personal Data in this way or transfer it to third parties for marketing purposes, please tick the appropriate box on the form used to collect your Personal Data.

We may also disclose your Personal Data to third parties in the following cases:

- if we sell or buy any business or assets; Personal Data of Users may be disclosed to a potential buyer or seller;
- if Kazakhstan Newslines LLP or all of its assets are purchased by a third party, Personal Data of Users will be transferred as one of the assets' form;
- if we are required to disclose or transfer Personal Data of the User in accordance with any applicable laws or within the implementation of decisions of the relevant courts, requests of judicial and law enforcement authorities or we are compelled to force Users to comply with the terms and conditions of the agreements signed with us;
- In case it is necessary to protect our rights, property or to guarantee the safety of Kazakhstan Newslines LLP, our Users or others; this includes the exchange of information with relevant organizations to prevent fraud and reduce the likelihood of default.

### 3. SECURITY AND STORAGE OF PERSONAL DATA

We have implemented security measures to ensure the confidentiality of your Personal Data and to protect it from loss, misuse, alteration or destruction. Only authorized personnel of Kazakhstan Newslines LLP have access to your Personal Data, and these personnel are required to treat the information as confidential. Security measures in place will, from time to time, be reviewed in line with legal and technical developments.

Whilst the transmission of information via the internet is not completely secure, we will endeavor to protect your Personal Data. With this in mind, we cannot, however, guarantee the security of the channels you will use to transfer your personal information to our Website. In this regard, you are solely responsible for possible failures in the transfer of your Personal Data to the Website. Once we

have received your Personal Data, we will use strict procedures and all necessary technical and security measures to prevent unauthorized access to your Personal Data.

#### 4. BASIS FOR PERSONAL DATA PROCESSING

We collect and process your Personal Data only when we have a legitimate reason for such processing. Legal grounds may include:

- your consent;
- an agreement, where processing is necessary to fulfill the terms and conditions of the agreement between you and Kazakhstan Newline LLP;
- compliance with legal obligations, where Kazakhstan Newline LLP is required to request/receive and process, as well as store your Personal Data in order to comply with the requirements of applicable laws, for example, the laws related to anti-money laundering and counter-terrorist financing;
- to use legitimate interest, for example, when processing is necessary to protect you or us from certain threats, such as fraud, security threats, etc.;
- Execution of corporate transactions (sale of participant interests/shares, mergers, acquisitions), etc.

In cases where the basis for Personal Data processing is your consent, you have the right to withdraw it at any time.

#### 5. YOUR RIGHTS

By contacting us you can use the following rights:

- the right to delete your Personal Data (all or part thereof, considering, however, our regulatory requirements to retain your personal data as set forth in Clause 8 of this Privacy Policy);
- the right to change or correct your Personal Data, in particular when it is incorrectly stated;
- the right to object or restrict processing of your Personal Data;
- the right to access to your Personal Data and/or copy of your Personal Data, which you have provided to Kazakhstan Newline LLP, in a machine-readable format.

In addition, you have the right to prohibit the use of your Data for marketing purposes. You can exercise this right by contacting us at any time.

Please note that the implementation of some of your rights, depending on the situation, may limit, complicate or completely exclude the possibility of further cooperation with us.

Our Website may contain active links from/to the websites of our partners, advertisers, affiliated companies, mass media or websites of sources where we

collect news to provide you our digests. If you are following an active link, please note that other websites have their own privacy policies, and we are not responsible for the provisions of these policies. Please review the privacy policies of these websites before sharing your Personal Data with them.

## 6. ACCESS TO PERSONAL DATA

The Data Protection Act 2018 gives you the right to access the information we hold on you. Your right of access can be exercised in accordance with the Data Protection Act 2018, and subject to your written request, sent to the email [info@newslines.kz](mailto:info@newslines.kz), we will provide you with the data we hold about you.

## 7. RETENTION OF PERSONAL DATA

Making sure your Personal Data is safe and secured is of the highest priority to us. We use secure storage facilities ensuring the safeguard of your Personal Data you share with us at all stages of interaction with our Platform using our products and Services. All appropriate measures to secure your Personal Data from potential hacking attacks, loss or misuse are implemented by our security team.

We will hold your Personal Data only for the duration of you using our products and Services via your Account, having regard to the purposes described in this Privacy Policy as well as legal and regulatory obligations that we comply with. In accordance with our record keeping obligations, we will retain your Account information and your Personal Data for at least a period of 5 (five) years from the moment you cease to carry on the use of our Services or the moment you end your client relationship with us unless otherwise required for legal or regulatory reasons.

We may access your Personal Data or retain it for a longer period if it will be subject to an official request or legal obligation, an investigation by governmental bodies or investigation into possible violations of our User Agreement and its essential parts, or in other cases to prevent possible harm based on our reasonable considerations.

If you will cancel your subscription to our email newsletter, we will hold your email on an inactive email list.

## 8. CHANGES TO THIS PRIVACY POLICY

Any changes we may make to our Privacy Policy in the future will be posted on this page and, where appropriate, a notification will be sent to you by email. We encourage you to check this page frequently to be aware of any updates or changes to the Privacy Policy.