

## **GENERAL PROVISIONS**

This privacy policy and personal data processing policy govern the procedure for processing and using personal and other data of the Atlas Capital Limited website (hereinafter referred to as the Company).

By providing personal and other data through the Website, the User confirms their consent to the use of the specified data under the conditions outlined in this Privacy Policy.

If the User disagrees with the terms of this Privacy Policy, they must cease using the Website.

The unconditional acceptance of this Privacy Policy is the User's commencement of using the Website.

### **1. TERMS**

1.1. Website – the website located on the Internet at <https://www.atlascapital.kz>. All exclusive rights to the Website and its individual elements (including software, design) fully belong to the Company. The transfer of exclusive rights to the User is not the subject of this Privacy Policy.

1.2. User – an individual using the Website.

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

1.4. Personal Data – the User's personal data, which the User provides independently during registration or while using the functionality of the Website.

1.5. Data – other information about the User (not included in the definition of Personal Data), including information that the Company receives when the User uses the Website (dates of User's visits, information about the User's use of the Website, including search queries, information about the User's device, including device model, type of device operating system, unique device identifiers, mobile network data, IP address, AppleID, hardware event data, including crashes and system activity, error reports, as well as settings, browser type and language, date and time of request and referral URL, cookies) and other information.

1.6. Application Form Completion – the User's completion of the Application Form located on the Website by providing and submitting the necessary information.

1.7. Application Form – a form located on the Website that the User can fill out to contact the Company.

1.8. Service(s) – services provided by the Company based on an agreement concluded with the User.

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

2.1. the company collects and stores only the personal data necessary for providing the services and interacting with the user.

2.2. personal data may be used for the following purposes:

2.2.1. providing services to the user;

2.2.2. identifying the user;

2.2.3. interacting with the user;

2.2.4. sending advertising materials, information, and requests to the user;

2.2.5. conducting statistical and other research.

2.3. the company processes, among other data, the following:

2.3.1. surname, first name, and patronymic;

2.3.2. email address;

2.3.3. phone number (including mobile).

2.4. the user is prohibited from providing personal data of third parties on the website (except when representing the interests of these parties with documented confirmation of their consent to such actions).

2.5. the company does not verify the accuracy of the information provided by users or their legal capacity. However, the company assumes that the user provides accurate information, updates it promptly, and has reached the permissible age as per the legislation.

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

3.1. the company undertakes to use personal data in accordance with the law "on personal data" of the republic of Kazakhstan and the internal documents of the company.

3.2. the confidentiality of the user's personal data and other data is maintained, except in cases where such data is publicly available.

3.3. the company has the right to keep an archival copy of the personal data. The company has the right to store personal data and data on servers located in the territory of the republic of Kazakhstan.

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

3.4.1. Government authorities, including investigative and law enforcement agencies, and local self-government bodies upon their reasoned request;

3.4.2. In other cases explicitly provided for by the current legislation of the Republic of Kazakhstan.

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

3.5.1. The User has given their consent to such actions;

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

3.6. The Company performs automated processing of Personal Data and Data.

3.7. The User consents to the Company sending, either on its own behalf or with the involvement of technical partners, informational, including service, and promotional messages to the User's email, mobile phone (SMS, phone calls), or via social networks, messengers, push notifications, and others. The User has the right to opt out of receiving promotional messages by contacting the Company via email at [info@atlascapital.kz](mailto:info@atlascapital.kz).

3.8. The User's Personal Data and Data are processed by the Company for the duration of the relationship between the User and the Company while the User uses the Website, and after termination, for the period necessary and established by the Legislation.

#### 4. PROTECTION OF PERSONAL DATA

4.1. the company provides appropriate protection for personal and other data in accordance with the legislation and takes necessary and sufficient organizational and technical measures to protect personal data.

4.2. the measures employed for protection include safeguarding personal data from unauthorized or accidental access, destruction, alteration, blocking, copying, distribution, as well as from other unlawful actions by third parties.

#### 5. OTHER PROVISIONS

5.1. this privacy policy and the relationship between the user and the company arising in connection with the application of the privacy policy shall be governed by the laws of the republic of Kazakhstan.

5.2. any disputes arising from this agreement shall be resolved in accordance with the current legislation at the place of registration of the company. Before resorting to court, the user must comply with the mandatory pre-trial procedure and send a written claim to the company. The response period to the claim is 30 (thirty) working days.

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

5.4. the company reserves the right to unilaterally change the privacy policy (in whole or in part) at any time without prior agreement with the user. All changes come into effect from the moment of their publication on the website.

5.5. the user undertakes to independently monitor changes to the privacy policy by familiarizing themselves with the current version.

5.6. all suggestions or questions regarding this privacy policy should be communicated via email: [info@atlascapital.kz](mailto:info@atlascapital.kz).