# **Confidentiality and Personal Data Processing Policy**

This Confidentiality and Personal Data Processing Policy regulates the procedure for processing and use of personal data and other data of POLPAN Insulation KZ's website (hereinafter referred to as the Administrator). The current version of this Confidentiality Policy can always be viewed and is available on the Internet on <a href="https://www.polpan.kz/">https://www.polpan.kz/</a>. By providing the Administrator with the personal and other data via the Website, the User acknowledges his/her consent that the said data may be used pursuant to the conditions laid down herein. Should the User not agree with the conditions of this Confidentiality Policy, he/she must cease to use the Website. The unconditional acceptance of this Confidentiality Policy is the fact that the User starts using this Website. The current version of the Policy, being a public document, has been developed by the Administrator and is available to any user of the Internet by following a hypertext link "Confidentiality Policy".

#### 1.TERMS

- 1.1. Website a website located on the Internet at <a href="https://www.polpan.kz">https://www.polpan.kz</a>. All the exclusive rights to the Website and its separate parts (including software, design) are wholly owned by the Administrator. Transfer of the exclusive rights to the User is outside the scope of this Confidentiality Policy.
- 1.2. User a user of the Website, an individual or legal entity, using a Feedback Form available on the website.
- 1.3. Legislation current legislation of the Republic of Kazakhstan.
- 1.4. Personal Data personal data of the User, which are provided by the User on his/her own when filling out a Feedback Form or in the course of use of the Website features.
- 1.5. Data other data about the User (not included in the Personal Data definition).
- 1.6. Feedback Form special fields, in which the User enters personal information in order that the User's data be transferred to the Website Administrator.
- 1.8. Service (s) services provided by the Administrator under the agreement.

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

- 2.1. Administrator collects and stores only those Personal Data, which are required for the provision of Services by the Administrator and interaction with the User.
- 2.2. Personal Data may be used for the following purposes:
- 2.2.1. provision of Services to the User;
- 2.2.2. identification of the User;
- 2.2.3. interaction with the User;
- 2.2.4. sending of the promotional materials, information and requests to the User;
- 2.2.5 conducting of the statistical and other research;
- 2.3. Administrator, inter alia, processes the following data:
- 2.3.1. last name, name and patronymic;
- 2.3.2. phone number (incl. mobile).
- 2.4. User is not forbidden to post the third parties' personal data on the Website (other than for the representation of interests of these parties having a documented confirmation of the third parties that such actions may be exercised).

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

- 3.1. Administrator shall use the Personal Data in accordance with the Law On Personal Data of the Republic of Kazakhstan and internal documents of the Administrator.
- 3.2. Personal Data and other Data of the User are kept confidential, except when the said data are publicly available.
- 3.3. Administrator has the right to retain a backup copy of the Personal Data.
- 3.3.1. Administrator has the right to store Personal Data and Data on the servers outside the Republic of Kazakhstan.
- 3.4. Administrator has the right to provide the Personal Data and Data of the User without the User's consent to the following entities:
- 3.4.1. state authorities, inter alia, bodies of inquiry and investigation, and local government authorities upon their reasoned request;
- 3.4.2. in other cases, expressly provided for by the current legislation of the Republic of Kazakhstan.

- 3.5. Administrator has the right to transfer the Personal Data and Data to the third parties not specified in c. 3.4. hereof in the following cases:
- 3.5.1. User granted his/her consent to do so;
- 3.5.2. data need to be transferred as part of use of the Website by the User or provision of Services to the User:
- 3.6. Administrator performs the automated processing of the Personal Data and Data.

## 4. PROTECTION OF PERSONAL DATA

- 4.1. Administrator ensures proper protection of the Personal Data and other data pursuant to the Legislation, and assumes appropriate and adequate organizational and technical measures to protect Personal Data.
- 4.2. Protection Measures being applied also allow to protect Personal Data against unauthorized or accidental access, destruction, change, blocking, copying, distribution, as well as against other illegal actions committed by the third parties as to such data.

### 5. OTHER PROVISIONS

- 5.1. The law of the Republic of Kazakhstan shall apply to this Confidentiality Policy and relations between the User and Administrator arising in connection with the application of the Confidentiality Policy.
- 5.2. In case for some reason one or more provisions of the Confidentiality Policy are recognized invalid or having no legal force, it will not affect the validity or applicability of the rest of provisions of the Confidentiality Policy.
- 5.3. Administrator has the right to change the Confidentiality Policy (in full or in part) unilaterally at any time without prior approval by the User. All changes come into force as of its publication on the Website.
- 5.4. User shall independently keep track of changes in the Confidentiality Policy by reviewing the latest version thereof.
- 5.5. All proposals or questions in relation to this Confidentiality Policy should be addressed by emailing to <u>info@polpan.com</u> or calling +7 727 387 95 59.