

## **Personal Data Processing Policy**

### **1. General Provisions**

This personal data processing policy is prepared in accordance with the requirements of the Law of the Republic of Kazakhstan dated May 21, 2013 No. 94-V "On Personal Data and Their Protection" and defines the procedure for processing personal data and measures to ensure the security of personal data by the company Finflow Ltd (hereinafter referred to as the Operator).

1. The Operator considers the observance of human and civil rights and freedoms in the processing of personal data, including the protection of the rights to privacy, personal, and family secrets, as its most important goal and condition for carrying out its activities.
2. This Operator's policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator may receive about users of "Finflow".

### **2. Key Terms Used in the Policy**

1. Automated processing of personal data – processing of personal data using computer technology;
2. Blocking of personal data – temporary cessation of personal data processing (except in cases where processing is necessary for the clarification of personal data);
3. Website – a collection of graphical and informational materials, and their availability on the "Finflow" platform;
4. Information system of personal data – a set of personal data contained in databases, and information technologies and technical means that ensure their processing;
5. Anonymization of personal data – actions that result in it being impossible to determine, without the use of additional information, the association of personal data with a specific User or other personal data subject;
6. Processing of personal data – any action (operation) or set of actions (operations) performed with or without the use of automation tools on personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), retrieval, use, transfer (distribution, provision, access), anonymization, blocking, deletion, and destruction of personal data;
7. Operator – a state body, municipal body, legal entity, or individual, independently or jointly with other persons, organizing and (or) carrying out the processing of personal data, as well as determining the purposes of

- personal data processing, the composition of personal data to be processed, and actions (operations) performed with personal data;
8. Personal data – any information relating directly or indirectly to a specific or identifiable User of the "Finflow" platform;
  9. User – any visitor of the "Finflow" platform;
  10. Provision of personal data – actions aimed at disclosing personal data to a specific person or a specific group of persons;
  11. Dissemination of personal data – any actions aimed at disclosing personal data to an indefinite group of persons (transfer of personal data) or at making personal data known to an unlimited number of persons, including publication of personal data in the media, posting in information and telecommunication networks, or providing access to personal data in any other way;
  12. Cross-border transfer of personal data – transfer of personal data to the territory of a foreign state to a foreign state authority, a foreign individual, or a foreign legal entity;
  13. Destruction of personal data – any actions resulting in the irrevocable destruction of personal data with no possibility of further recovery of the content of personal data in the information system of personal data and (or) resulting in the destruction of the physical media containing personal data.

### **3. The Operator may process the following personal data of the User**

1. First Name, Last Name, Patronymic;
2. Company Name;
3. Email Address;
4. Phone Number;
5. In exceptional cases upon request, the following information: financial data from payment systems, bank statements, data from 1C-Accounting.
6. The above-mentioned data are hereinafter referred to as Personal Data in the text of the Policy.

### **4. Purposes of Personal Data Processing**

1. The purpose of processing the User's personal data is to inform the User by sending emails.
2. The Operator also has the right to send the User notifications about new products and services, special offers, and various events. The User can always opt out of receiving informational messages by sending an email to the Operator at [admin@finflow.pro](mailto:admin@finflow.pro) with the subject "Unsubscribe from notifications about new products and services and special offers."

3. Anonymized data of Users collected through internet statistics services are used to gather information about Users' actions on the site, improve the quality of the site and its content.

## **5. Legal Grounds for Personal Data Processing**

1. The Operator processes the User's personal data only if they are filled in and/or submitted by the User independently through special forms located in the Finflow application. By filling out the respective forms and/or submitting their personal data to the Operator, the User expresses their consent to this Policy.
2. The Operator processes anonymized data about the User if this is allowed in the User's application settings (the saving of "cookies" and the use of JavaScript technology are enabled).

## **6. Procedure for the Collection, Storage, Transfer, and Other Types of Processing of Personal Data**

The security of personal data processed by the Operator is ensured by implementing legal, organizational, and technical measures necessary to fully comply with the requirements of the current legislation in the field of personal data protection.

1. The Operator ensures the security of personal data and takes all possible measures to exclude access to personal data by unauthorized persons.
2. The User's personal data will never, under any circumstances, be disclosed to third parties, except in cases related to compliance with applicable law or with the User's consent for the collection and processing of personal data by third parties who are partners of Finflow Ltd.
3. In case of inaccuracies in the personal data, the User can update them independently by sending a notification to the Operator at the email address [admin@finflow.pro](mailto:admin@finflow.pro) with the subject "Personal Data Update."
4. The period for processing personal data is unlimited. The User can withdraw their consent to the processing of personal data at any time by sending a notification to the Operator via email at [admin@finflow.pro](mailto:admin@finflow.pro) with the subject "Withdrawal of Consent to Personal Data Processing."

## **7. Cross-Border Transfer of Personal Data**

1. Before starting the cross-border transfer of personal data, the Operator must ensure that the foreign state to whose territory the personal data is to be transferred provides reliable protection of the rights of personal data subjects.
2. Cross-border transfer of personal data to the territories of foreign states that do not meet the above requirements can only be carried out if there is written consent from the personal data subject for the cross-border transfer of their personal data and/or for the execution of a contract to which the personal data subject is a party.

## **8. Final Provisions**

1. The User can obtain any clarifications on questions of interest regarding the processing of their personal data by contacting the Operator via email at [admin@finflow.pro](mailto:admin@finflow.pro).
2. Any changes to the Operator's personal data processing policy will be reflected in this document. The policy is effective indefinitely until it is replaced by a new version.
3. The current version of the Policy is freely available in the application.