

<https://kytaza.com>®

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## Privacy Policy of KYTaza LLP

To be in force from October 25, 2024

This Privacy Policy (hereinafter - Personal Data Processing Policy / Policy) is an offer contract between the User, on the one hand, and Limited Liability Partnership “KYTaza” (BIN 260240014633).

By using the website <https://kytaza.com> and/or mobile application(s) for IOS or Android, any person accepts the terms of this Privacy Policy.

Use of the Website means following the link <https://kytaza.com>, including other domains and subdomains, to read or view the materials on the Website or to download information, as well as passing the registration procedure by filling out the appropriate form on the Website and sending it to processing by pressing the “REGISTER” key.

The use of Applications means downloading and installing mobile application(s) on the User's mobile device containing in one way or another a trademark, trade name and/or the Company's name.

The Personal Data Processing Policy is developed in accordance with the Law of the Republic of Kazakhstan dated May 21, 2013 No. 94-V “On Personal Data and Their Protection”, taking into account the provisions of the General Data Protection Regulation of the European Union dated April 27, 2016, as well as other legislative acts of the Republic of Kazakhstan and local regulatory legal acts.

The Personal Data Processing Policy regulates legal relations related to the processing of personal data between KYTaza LLP (Business Identification Number (BIN) 260240014633, legal address: Republic of Kazakhstan, Almaty, Medeu District, Gogol Street 39, postal code 050000) (hereinafter – the Company) and the User of the website <http://kytaza.com> (hereinafter – the User).

This Policy applies to all personal data that the Company receives from Users..

### 1. The following terms are used in the Policy:

1. **Company** - a party to this contract-offer, Limited Liability Partnership “KYTaza”, BIN 260240014633;
2. **User** - a party to this contract-offer, which can be any person who has the legal capacity to accept the terms of this Policy and wishes to order the Company's services, leave a comment, register on the website or perform other actions provided by the functionality of the Company's Internet resource;
3. **Website** - <https://kytaza.com>, the Company's Website or Internet resource, taking into account all levels of domain names owned by the Company;

4. **Applications** - mobile application(s) for IOS or Android belonging to Limited Liability Company "KYTaza" TIN 01209202410314;

5. **Personal Data** - any information relating to a directly or indirectly defined or identifiable natural person (subject of personal data). Such information, in particular, may include: surname, name, patronymic, year, month, date and place of birth, address, information about family, social, property status, information about education, profession, income, as well as other information that allows to determine (identify) the subject of personal data;

6. **Processing of personal data** - any action (operation) or set of actions (operations) performed with or without the use of automation means with personal data, including collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access, depersonalization, blocking, deletion, destruction of personal data.

## **2. General Provisions**

2.1 The Company sets as its most important goal and condition of its activity the observance of human and citizen's rights and freedoms during processing of his/her personal data, including the protection of rights to privacy, personal and family secret;

2.2 The use of the Website by the User means consent to this Privacy Policy and the terms of processing of the User's personal data;

2.3 In case of disagreement with the terms of the Privacy Policy, the User must stop using the Site;

2.4 The consent to processing of personal data provided by the User shall be valid from the date of providing such consent until the moment of achieving the purposes of processing or revocation of consent by the User, unless otherwise provided by the current legislation;

2.5 The User may revoke the consent provided to the Company at any time in accordance with the procedure set forth in this Policy;

2.6 When using the functionality of the Website, the User may provide the Company with the following personal data (the list and types of personal data depend on the specific functionality of the Internet resource used by the User): surname, first name, e-mail address, contact telephone number, user identification data (user ID), and other data;

2.7 By providing their personal data, the User agrees to their processing (up to the revocation of the User's consent to the processing of personal data), including collection, storage, depersonalization, transfer to third parties in cases provided for by the Policy, by the Company in order to provide the User with advertising, reference information, services in accordance with the functionality of the Site and for other purposes in accordance with Section 3 of this Policy.

## **3. Purpose of collection and processing of the User's personal data**

The Company uses the data provided by the User for the purposes of:

3.1 Analyzing and monitoring cryptocurrency transactions in the blockchain, providing anti-money laundering compliance and risk management solutions for exchanges, banks and financial institutions, in accordance with the "KYC" procedure - "Know Your Customer";

3.2 Communicating with the User, within the framework of provision of services and use of the Company's services;

3.2 Conducting statistical research;

3.3 Keeping records and complying with statutory obligations, for internal business purposes, such as record keeping, legal and tax obligations;

3.4. Processing User's orders, transactions, cryptocurrency transactions;

3.5. Improving the quality of the Application and the Website.

#### **4. Categories of Personal Data**

4.1 The Company receives the User's Personal Data listed below in the following cases:

- Name, address, e-mail address, company name, actions performed on the Website or Applications, and other contact information when using the Website;

- When addressing letters, applications, by sending them to the Company's e-mail address with the domain @kytaza.com - e-mail address, full name, nickname, phone number and other contact information specified by the User when registering in the e-mail client;

- Information that the Company collects when using the Website and Applications

The Company may collect technical information when a User visits the Websites or uses the Company's mobile applications and services. This includes information such as IP address, the type of mobile device used, the device's operating system and browser type, the device's unique identifier, the address of referring websites, the path the user takes through the Company's websites and mobile applications, and so on. The Company may also use technologies such as cookies, web beacons and mobile device identifiers to collect information about the use of the Company's websites and mobile services. Cookies allow the Company to provide Users with relevant information as they use the Company's websites and mobile services (e.g., to open and load relevant pages). Web beacons allow the Company to recognize whether a particular page has been visited, whether an email has been opened, or whether banner ads on the Company's Web site and other sites have been effective.

The Company uses this information to ensure the performance of its websites and mobile applications, to improve the quality of its services, to correct errors and to improve the user

experience in general. The Company does not seek to identify any particular user of the Company's websites, mobile applications and services.

- Information on order processing, transactions, cryptocurrency operations

The Company also collects User data to process orders, transactions, cryptocurrency transactions, pricing and other information related to the User's order and transaction history.

In order to provide access for transactions, cryptocurrency operations and other transactions with digital assets, the Company has the right to request the User's verification procedure, which may include the collection and processing, by the methods listed in Section 3 of this Policy, of the User's Personal Data, including biometric data, such as a photo, passport photo, photo of the User with passport, ID, copy of the license to drive a vehicle, request confirmation of the User's e-mail address, and request confirmation of the User's personal data.

The verification procedure may have several levels of KYC access, depending on the amount of transactions/transactions made by the User.

The above Personal Data is processed by the Company solely for the purpose of identification of the User and ensuring a safe space for all to conduct transactions within the framework of the FATF program on "Combating Money Laundering, Countering the Financing of Terrorism and Financing the Creation of Weapons of Mass Destruction" and is not transferred to third parties, except for affiliates of the Company, or at the request of state law enforcement agencies in accordance with the KYC legislation.

- Users' social network information, such as social network name (nickname), phone number, e-mail address, gender, age, photo and other information specified in the User's account when registering in a social network.

The Company may have official accounts in various social networks.

Depending on the User's social network settings, the Company may receive information from the social network provider. For example, when the User follows the Company's activities through social media platforms, the Company may receive personal data from these platforms related to the User's profile;

4.2 To provide certain services or when using software, the Company may collect other categories of Personal Data and use such information for purposes other than those described above, but not inconsistent with the purposes of processing Personal Data specified in clause 3 of this Policy. The Company notifies the User about the collection of Personal Data when registering for a service or downloading software.

## **5. Conditions of collection and processing of the User's Personal Data**

5.1 The Company processes the above mentioned categories of Personal Data in the following ways:

- Collection, recording, systematization, accumulation, storage, clarification (update, change), extraction, use, transfer (distribution, provision, access), depersonalization,

blocking, deletion, destruction of Personal Data, with or without the use of automated means.

5.2 Processing of personal data is carried out both with the use of automated means and without their use;

5.3 The Company has the right to receive and process by the above mentioned methods the User's Personal Data from other legal entities, partner companies, affiliated companies belonging to the group of companies of "KYTaza" Ltd. for the purposes not contradicting the purposes of Personal Data processing specified in clause 3 of this Privacy Policy;

5.4 The Company undertakes not to transfer the information received from the User to third parties, except as specifically provided for in this Policy;

5.5 The transfer of Users' personal data to third parties - partners of the Company, if necessary, is carried out on the basis of Users' consent in order to fulfill obligations to Users;

5.6 The Company, and in case of necessity to transfer personal data of Users to third parties - partners of the Company, these persons undertake to keep secret, not to disclose and not to distribute personal data without the consent of the User, unless otherwise provided by the current legislation and/or this Policy;

5.7 Storage of personal data is carried out within the period of time objectively necessary for fulfillment of obligations to Users and is determined by the following events (depending on which event occurs earlier):

5.7.1. until the User deletes the personal data via the personal account;

5.7.2. until the Company destroys the personal data due to the User's request to destroy the personal data or revoke the consent to its processing;

5.7.3. until the expiration of the User's consent.

5.8 The Company has the right to store the User's personal data, except in cases of receipt of a request to destroy the data or withdrawal of consent to data processing, in anonymized form after the fulfillment of obligations to the User for the purposes specified in clause 3 of this Policy;

5.9 If it is necessary to transfer personal data of Users to third parties - partners of the Company in cases directly stipulated by the Policy, such transfer shall be carried out in compliance with the following conditions:

5.9.1. the third party partner of the Company ensures confidentiality of personal data during their processing and use and undertakes not to disclose the data to other persons, as well as not to distribute personal data of Users without their consent;

5.9.2. the third party partner of the Company guarantees compliance with the following measures to ensure security of personal data during their processing: use of information protection means; detection and recording of unauthorized access to personal data and taking measures to restore personal data; restriction of access to personal data; control and

evaluation of the effectiveness of the applied measures to ensure security of personal data, other measures provided for by law;

5.9.3. a third party partner of the Company is prohibited to transfer and distribute personal data of Users.

5.10. It shall not be considered a violation of the obligations stipulated by this Policy, transfer of information in accordance with reasonable and applicable requirements of the legislation of the Republic of Kazakhstan, as well as the provision of information by the Company to partners acting on the basis of a contract (agreement) with the Company to fulfill obligations to the User; transfer by the Company to third parties of data about the User in an impersonal form in order to assess and analyze the work of the Company's Website, provide personal recommendations, display advertisements

5.11. The Company has the right to use "cookies" technology. Cookies do not contain confidential information. Cookies are used to remember the User's preferences and settings, as well as to collect analytical data on visits to the Site. Use of the Site means that the User agrees to the use of all cookies and analytical data on visits to the Site, as well as their transfer to third parties;

5.12. The User has the right to receive information from the Company regarding the processing of his/her personal data. The Company provides the User or its representative with the opportunity to familiarize with the personal data related to the User free of charge;

5.13. In case of revealing incompleteness, inaccuracy or irrelevance of the information, the Company, based on the User's information, makes necessary changes to the User's personal data within a period not exceeding 7 (seven) business days and notifies the User of the changes made;

5.14. If the User or his/her representative provides the Company with confirmation of the fact of unlawful receipt or processing of his/her personal data, as well as the fact of inconsistency of actions with his/her personal data with the purposes of processing, the Company within a period not exceeding 7 (seven) working days undertakes to destroy such personal data of the User and notify the User of the measures taken;

5.15. Unless otherwise provided for by the laws of the Republic of Kazakhstan, the Company shall cease processing of Personal Data (with respect to any of the purposes stated above) and destroy such Personal Data in cases where:

5.15.1. Liquidation of the Company;

5.15.1. Reorganization of the Company resulting in termination of its activities;

5.15.1. The legal basis for processing Personal Data and/or achievement of the purposes of Personal Data processing ceases to exist.

5.15.1. Withdrawal of consent to the processing of Personal Data by the Personal Data Subject.

Specific procedure for destruction of Personal Data on media containing Personal Data, including external/removable electronic media, paper media and in information systems of Personal Data, shall be determined by the Company in its internal documents and local regulations.

## **6. Terms of termination of processing of the User's personal data**

6.1 The Company is obliged to stop processing of the User's personal data or ensure that processing is stopped by a third party partner of the Company in case of:

6.1.1. detection of unlawful processing of the User's personal data;

6.1.2. revocation of the User's consent to the processing of his/her personal data;

6.1.3. receiving a request from the User to destroy personal data;

6.1.4. achievement of the purpose of personal data processing.

6.2 Upon occurrence of the cases specified in clause 6.1. the Company stops processing of personal data and ensures destruction of data within a period not exceeding 30 (thirty) days, unless another period is established by law;

6.3 If it is impossible to destroy the User's personal data within the specified period, the Company blocks the User's personal data and ensures its destruction within the period established by law, but not more than 6 (six) months.

## **7. Final provisions**

7.1 The User may obtain any clarifications on any questions concerning the processing of his/her personal data by contacting the Operator via e-mail at [info@kytaza.com](mailto:info@kytaza.com).

7.2 This document will reflect any changes to the Operator's personal data processing policy. The Policy is valid indefinitely until it is replaced by a new version.

7.3 In case of disagreement with the terms of the Policy, the User shall immediately stop using the Site and its services. Continued use of the Site or its services after publication of the new version of the Policy means acceptance of the Policy and its terms by the User.

7.4 The current version of the Policy is freely available on the Internet at <http://kytaza.com>.

7.5 We store User data, such as IP address