

## **POLICY**

### **regarding personal data collection, processing and protection of personal data subjects**

#### **1. General Provisions**

##### **1.1. Purpose of Documents**

This policy regarding personal data collection, processing and protection is the basic internal document of the Limited Liability Partnership CDEK Central Asia (hereinafter the Partnership) regulating issues of personal data collection, processing and protection.

This Policy was developed pursuant to Republic of Kazakhstan legislation on personal data.

This Policy is intended to familiarize an unlimited group of individuals by posting on the website <https://cdek-express.com/>.

The Policy shall establish the procedure for personal data collection and processing, including establishing actions for personal data collection, classification, accumulation, storage, revision (updating, modification), and destruction, as well as establishing procedures aimed at safeguarding personal data.

The Partnership management shall acknowledge the importance and necessity of personal data safeguarding and encourage constant improvement in the personal data protection system.

The Policy shall be approved and reviewed every three years, as well as:

- with a change in the regulatory base affecting the principles and (or) processes of personal data processing in the Partnership;
- with the creation of new or changes to the existing processes of personal data processing of customers.

##### **1.2. Regulatory References**

Republic of Kazakhstan Law No. 94-V dated May 21, 2013 "On Personal Data and Their Protection" (hereinafter the Law).

Republic of Kazakhstan Government Decree No. 909 dated September 7, 2013 "On Approving the Rules for Taking Measures to Protect Personal Data by the Owner and (or) Operator, as well as Third Parties".

Republic of Kazakhstan Government Decree No. 1214 dated November 12, 2013 "On Approving the Rules for Determining the Owner and (or) Operator of the List of Personal Data, Necessary and Sufficient for Their Fulfillment of Tasks".

Republic of Kazakhstan Ministry of Digital Development, Innovations and Aerospace Industry Order No. 395/NK dated October 21, 2020 "On Approving the Rules for Personal Data Collection and Processing".

##### **1.3. Abbreviations**

PD - personal data;

PDB - personal data base;

Partnership - CDEK Central Asia LLP;

RK - Republic of Kazakhstan;

Website –<https://cdek-express.com/>.

##### **1.4. Domain of Validity**

1.4.1. The validity of this Policy shall extend to all Partnership processes in which PD of PD subjects are collected and processed using computer equipment, including information-telecommunication networks, as well as without the use of such devices.

This Policy shall be applied, in particular, but not limited to:

during navigation on the Website without filling an order for rendering services, as well as with the use of services offered on the Website; when compiling an order on the Website or in the

office, when completing an order form on the Website; with other use of the Website in accordance with the User's Agreement.

The validity of this Policy shall not extend to PD processing of employees of the Partnership and candidates for vacant positions, other PD subjects not directly designated in this Policy, since these relationships are regulated by other internal acts.

The Policy shall not examine issues of safeguarding PD duly classified as information comprising a Republic of Kazakhstan state secret.

### **1.5. Terms and Definitions**

1) Personal data: information referring to a definite or PD subject definable on its basis and recorded on electronic, hard and (or) other storage drive;

2) PD blocking: actions for temporary PD collection, accumulation, change, supplementing, use, dissemination, depersonalization and destruction;

3) PD accumulation: actions for PD classification by entering them into the base containing PD;

4) PD destruction: actions as a result of which it is impossible to restore PD;

5) PD depersonalization: actions as a result of which it is impossible to determine that the PD belongs to a PD subject;

6) base containing PD: set of regulated PD;

7) owner of base containing PD: state agency, individual and (or) legal entity that in accordance with the Republic of Kazakhstan laws executes the right of ownership, use and disposition of the base containing PD;

8) operator of base containing PD (hereinafter the operator): state agency, individual and (or) legal entity collecting, processing and protecting PD.

The operator in this Provision shall be the Limited Liability Partnership CDEK Central Asia;

9) PD protection: a set of measures, including legal, organizational and technical taken for the purposes established by this Law;

10) PD safeguarding service: a service to ensure information interaction between the owners and (or) operators and the subject, including receiving from the subject of consent to collect, process PD or their transfer to third parties, including through this interaction between the owners and (or) the operators independently;

11) PD processing: actions aimed at accumulating, storing, changing, supplementing, using, disseminating, depersonalizing and destroying PD;

12) PD use: actions with personal data aimed at executing the goals of activity by the owner, operator and third party;

13) PD storage: actions to ensure the integrity, confidentiality and accessibility of PD;

14) PD dissemination: actions as a result of which PD is transferred, including via mass information or access to personal data is provided by any other method;

15) PD subject: an individual to whom the PD refers;

16) third party: an individual who is not the subject, owner and (or) operator, but is related to them by circumstances or legal relationships for PD collection, processing and protection;

17) PD collection: actions aimed at receiving PD.

## **2. Main Regulatory Provisions**

### **2.1. Principles for PD Collection and Processing**

The Partnership shall ensure observance of the principles for PD collection, processing and protection indicated in Art. 5 of the Law.

PD collection and processing shall be done on a legal and just basis and shall be limited to achieving specific, pre-defined and legal goals and tasks. Redundancy of processable data is not allowed.

When processing PD, accuracy of PD must be ensured, their sufficiency, and if necessary, also relevance in relation to the goals of PD processing. The Partnership shall store PD in a form allowing determination of the PD subject not longer than required by the goals and tasks of PD processing, and shall destroy PD when the goals of their processing have been reached or if there is no need to achieve these goals, if not otherwise specified by federal law.

Processable PD shall be destroyed or depersonalized when the processing goals have been achieved or if it is not necessary to reach these goals, if not otherwise specified by the Law of this Policy.

## **2.2. Goals of PD processing**

The Partnership shall process the personal data of PD subjects for the following purposes:

1) Allowing the PD subject to interact with the Website, including providing access to Website personalized resources, to Websites or services of the Partnership partners pursuant to the User Agreement;

2) Establishing ties with the PD subject, including to provide them with information about services rendered, by sending notifications, requests and information concerning rendering services and/or execution of current agreements, as well as processing requests and applications from the PD subject;

3) Rendering services, entering into and executing agreements and contracts with customers (potential customers);

4) Improving the quality of rendered services and their convenient use, developing new services (sending to the PD subject via information communication systems, sms, e-mail and other information communication devices about special offers, new services, events, any information reports, including advertising and other information in the name of the Partnership or in the name of the Partnership's partners);

5) Fulfilling the Republic of Kazakhstan legislation requirements;

6) Conducting statistical and other studies based on depersonalized data, conducting inquiries and studies to detect satisfaction/dissatisfaction of the customer with the Partnership's services and improving service quality.

## **2.3. Categories of Collectable and Processable PD**

The Partnership shall process the following PD categories:

1) PD of an individual user of the Website that they transmit independently: name, address, e-mail, address (country, city, street, house number, apartment number), telephone number, as well as that transmitted automatically by the Website and services during their use: information about the browser used (or other program used to gain access to the Website), data of the cookie file, location, IP-address, Internet pages requested, entry source to the Website and other similar information.

2) PD of a legal entity customer (potential customer) whose PD has become known to the Partnership because of entry into and execution of a contract: full name, data of identity document, address (country, city, street, house number, apartment number), e-mail address, telephone number (home, mobile), taxpayer identification number;

3) PD of an individual whose PD were obtained by the Partnership from the Customer of services under the courier services contract: full name, data of identity document, address (country, city, street, house number, apartment number), e-mail address, telephone number (home, mobile), taxpayer identification number;

4) PD of other subjects transferred to the Partnership by other individuals based on contracts entered into and/or consent to collect and process PD. The Partnership shall not collect and process PD of customers concerning race, nationality, political views, religious or philosophical convictions, state of health and intimate life.

The Partnership shall not verify the reliability of the personal information provided by the subject and shall not be able to evaluate their competence. However, the Partnership shall

proceed from the fact that the user provides reliable and sufficient personal information and maintains this information in an up-to-date state.

### **3. Procedure and conditions for collecting and processing PD**

#### **3.1. Methods for Obtaining PD of a Subject**

PD of a PD subject shall be collected and processed by the Partnership with the Subject's consent or of their legal representative. The Partnership is allowed to collect PD of Customers through:

- personal reporting by the subject of their data (provision of documents) when drawing up the delivery in the office;
- entry by the subject of their data in any section of the Website;
- the PD subject completing marketing sheets (coupons);
- third parties (customers, contractors);
- public sources.

#### **3.2. Procedure for a Subject Consenting to PD Collection and Processing**

PD processing consent may be given by a subject (or their legal representative) in writing, as an electronic document, through a PD safeguarding service or other method using protective elements that do not contradict Republic of Kazakhstan legislation. If the PD subject enters their data on the Website, consent to PD processing shall be considered the submission by the PD subject by their taking the following implied actions in total: by pressing the button when compiling an order, entering a special sign - "check mark" or "web-marker" in the special field on the Website when compiling an order, ordering a return call, contacting as feedback, completing a questionnaire for entering into a contract.

These actions shall be evaluated clearly as acceptance of the User Agreement terms and conditions and consent to PD processing in the scope, for the purposes and per the procedure specified in the text (text "Consent" - Appendix No. 1 to this Policy) specified in the special sign for reading the text suggested before submission.

If the PD subject fills out marketing sheets, consignment delivery notes, other documents by signing, the PD Subject shall consent to accepting the Public Offer terms and conditions stated in the Courier Services Contract and Remuneration Regulation posted on the Website, which also means consent to PD processing.

If PD are obtained from third parties (customers, contractors), the obligation to obtain consents to PD processing and transfer shall be placed on these third parties.

If PD are obtained from public information sources, no consent is required from the PD subjects.

Consent shall be considered received from the time of entering the special sign (signature) and shall be valid until the PD subject sends the relevant statement of termination of PD processing at the location of the Operator. If there is no consent from the Subject to process their PD, such processing shall not be done.

#### **3.3. PD access and confidentiality**

The Partnership during its activity shall entrust PD processing to third parties with the consent of the PD subjects, with the mandatory condition that the individual processing the PD on the instructions shall observe the processing principles and rules and also safeguard the PD.

The list of individuals allowed to collect and process PD shall be determined by the instructions of the Executive body and internal local regulatory acts of the Partnership. Before the start of work, these individuals must be familiar with the provisions of RK legislation on PD, including the requirements for the PD protection procedure with documents defining the Operator's actions regarding PD collection and processing, including with this Policy, and local acts on issues of PD collection and processing.

Access to PD of PD subjects shall be given to the Operator's employees in accordance with their official duties. The Operator's employees processing the PD of PD subjects must be informed about such processing, about the features and rules for such processing established by the regulatory legal acts and internal documents of the Operator. The Partnership employee entitled to process PD of PD subjects shall be given a unique login and password to duly access the relevant information system. Information about the identifiers assigned to the Employee (login and password) shall be confidential and cannot be communicated by the Employee to third parties. The Employee shall ensure compliance with the confidentiality requirements and shall bear the risk of the consequences related to violation of such requirements. The authentication procedure shall be conducted by the employer's technical center when the employee accesses the information system by comparing the entered login and password with the relevant login and password assigned to the employee, information about which is contained in the information system. If the authentication procedure is passed successfully, the Employer shall be able to perform operations with the PD of the PD subject in the information system. The Partnership shall not post the PD of PD subjects in public sources.

#### **3.4. PD Accumulation and Storage**

PD shall be accumulated by collecting the PD necessary and sufficient to perform the tasks to be done by the owner and (or) operator, as well as by a third party.

PD of the PD subject, whose processing goals vary, shall be stored separately within the information system, or if stored on storage drives, within the structure of business of the Operator's relevant division.

PD of the PD subjects shall be stored by the Partnership in a form allowing determination of the PD subject.

The PD storage periods shall not be longer than as required by the goals of PD processing, if the PD storage period has not been established by law, contract or defined by the terms and conditions of consent to PD processing (Appendix No. 1 to this Policy), or before the time of statement by the User of their desire to recall the consent for PD collection and processing. The PD shall be blocked on the Website based on a written statement from the PD subject.

The PD subject shall be entitled to demand in writing the destruction of their PD if the PD are incomplete, outdated, unreliable, obtained illegally or are not necessary for the stated purpose of the processing. If it is not possible to destroy the PD, the Operator shall block such PD.

PD shall be destroyed by erasing information using certified software with guaranteed destruction (in accordance with the assigned characteristics for the established software with guaranteed destruction).

#### **3.5. PD Protection**

When collecting and processing PD, the Partnership shall take all requisite legal, organizations and technical measures to protect the personal data from illegal or accidental access to them, destruction, modification, blocking, copying, submission and dissemination of PD, as well as from other illegal actions. A person responsible for arranging PD processing shall be appointed in the Partnership.

PD shall be safeguarded, in particular:

- by appointing a person responsible for arranging collection and processing of PD;
- approval by the Partnership of this Policy, local acts on issues of PD collection and processing, as well as local acts establishing the procedures aimed at preventing and detecting violations of legislation and elimination of the consequences of such violations;
- by taking legal, organizational and technical measures to safeguard PD pursuant to Art. 22 of the Law;
- by internal monitoring of compliance of PD collection, processing and storage with the Law and regulatory legal acts adopted in accordance with it, with this Policy and local acts of the Partnership;

- by familiarization of the operator's workers (employees) directly collecting, processing and storing PD with the provisions in the Republic of Kazakhstan legislation on PD, including requirements for PD protection, this Policy, local acts on issues of PD collection, processing and storage, and (or) training of workers (employees).

### **3.6. Processing Requests by PD Subjects**

In order to ensure observance of the rights of PD subjects established by law, the Partnership has developed and introduced a procedure for working with appeals and requests from PD subjects, as well as a procedure for providing PD subjects with information established by Republic of Kazakhstan legislation for PD.

The request from a PD subject must contain the number of the main document identifying the PD subject or their legal representative, information about the date of issue of the indicated document and its issuing body, information confirming the participation of the PD subject in relationships with the Partnership (contract number, date of entry into the contract, conventional word designation and (or) other information), or information otherwise confirming the fact of PD processing by the Partnership, signature of the PD subject or their representative, and date of contact.

The Partnership workers shall not have the right to answer questions related to transfer or disclosure of PD by telephone or fax because in such a case it is not possible to identify the accessing person.

Requests from subjects must be sent to: 40-4/67 Seyfullina Prospekt, Almaty, Republic of Kazakhstan, 050004.

## **Appendix No. 1 to the Policy on PD Collection Processing and Processing of PD Subjects**

**To the Manager of Limited Liability Partnership CDEK Central Asia**

BIN 120440014325

Address: 404/67 Seryfullina Prospekt,  
Almaty, Republic of Kazakhstan, 050004

### **Consent**

to PD Collection and Processing for Website Users

I hereby freely, of my own will and in my own interest state that I have been informed and I consent, in accordance with Republic of Kazakhstan Law No. 94-V dated May 21, 2013 "On Personal Data and Their Protection" and other Republic of Kazakhstan regulatory legal acts (hereinafter jointly the Law) that the information provided by me, including data on:

surname, given name, patronymic;

e-mail address;

address (city, street, house number, apartment number) for collection\delivery of shipment;

telephone number;

information about browser used;

location;

IP-address;

cookie file data;

requested Internet pages;

source of entry to website <https://cdek-express.com/>;

passport date (if necessary)

shall be entered into the information systems of CDEK Central Asia LLP.

I give the right to collect, process, and transmit these data (including I give the right to cross-border transfer), by methods not contradicting the law in order to arrange the process of providing my requested information regarding services of CDEK Central Asia LLP, order of services, etc. with the exception of where directly established otherwise.

I have been informed that my personal data will be used for:

- allowing the PD subject to interact with the Website, including providing access to Website personalized resources, to Websites or services of the Partnership partners pursuant to the User Agreement;

- establishing ties, including to provide information about services rendered, by sending notifications, requests and information concerning rendering services and/or executing current agreements, as well as for processing requests and applications;

- rendering services, entering into and executing agreements and contracts;

- improving the quality of services rendered and their convenient use, developing new services (sending to the PD subject via information communication systems, sms, e-mail and other communication devices information about special offers, new services, events, any information reports, including advertising and other information in the name of the Partnership or in the name of the Partnership's partners);

- fulfilling the Republic of Kazakhstan legislation requirements;

- conducting statistical and other studies based on depersonalized data, conducting inquiries and studies to detect satisfaction/dissatisfaction of the customer with the Partnership's services and improving service quality.

In relation to the aforementioned goals, I understand that my personal data may be reported to third parties, and I consent to this.

If my data are given to third parties, including contact data, I confirm that the third party has been informed about the processing of their personal data by the Operator.

I consent to the use of the submitted PD to send commercial information by the Operator for PD processing to third parties by this telephone number and e-mail address.

I give the right to send me information about services, proposals and advertising events of the Operator and/or its Partners, including via electronic and mobile communication.

This consent shall be valid from the day of its submission to the day of recall in writing.

I hereby was informed that I am entitled to demand revisions in my PD, their blocking or destruction if the PD are incomplete, outdated, inaccurate or are not necessary for the stated processing goal, also at any time I may demand termination of PD processing after sending the relevant statement to the Operator's location. I understand that the result of recalling the consent regarding part of the data and/or regarding certain goals may result in complete termination of processing of my PD to implement the goals of this consent.

I have also been informed that at any time I can refuse to receive commercial information, after sending my statement to the Operator's location.

I have read the text of this agreement, and I do not have any additions, comments or objections.