

Personal Data Protection and Processing Policy

The given Personal Data Protection and Processing Policy (hereinafter referred to as the "**Policy**") applies to all information that website of the Private company Otokar Central Asia Limited located on the domain names [www.otokarcentralasia.kz] may receive about the User during the use of the website, software and website products.

1. Terms

- 1.1. The following terms are used in this Policy:
 - 1.1.1. "Website" - a set of graphic and information materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address [www.otokarcentralasia.kz].
 - 1.1.2. "Website administration" (hereinafter referred to as the "**Website administration**") - authorized employees to manage the site who organize and/or process personal data, and also determine the purposes of personal data processing, the composition of personal data to be processed, actions (operations) performed with personal data.
 - 1.1.3. "Personal Data" means any information relating to a directly or indirectly identified or identifiable individual (personal data subject).
 - 1.1.4. "Processing of personal data" means any action (operation) or set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, classification, accumulation, storage, revision (update, amendment), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.
 - 1.1.5. "Confidentiality of Personal Data" means a mandatory requirement for the Operator or other person who has obtained access to personal data to prevent their distribution without the consent of the personal data subject or the existence of other legal grounds.
 - 1.1.6. "Website User (hereinafter referred to as the "**User**")" - a person who has access to the site through the Internet.
 - 1.1.7. "Cookies" means a small piece of data sent by a Web server and stored on the user's computer that the Web client or Web browser forwards to the Web server each time in an HTTP request when trying to open the page of the corresponding site.
 - 1.1.8. "IP address" is the unique network address of a host on an IP-built computer network.

2. General provisions

- 2.1. In case of disagreement with the Policy, the User must stop using the website.
- 2.2. This Policy applies only to the website of the Private company Otokar Central Asia Limited. The website does not control or responsible for any third-party websites to which the User may access via links available on the websites of Otokar Central Asia Limited.
- 2.3. The Website administration does not verify the reliability of the personal data provided by the User.
- 2.4. The collection, processing and storage of personal data obtained through the website is carried out by the Operator with the consent of the User or his legal representative, except for cases when the collection, processing and storage of personal data are carried out without the consent of the User or his legal representative, namely:
 - a. the implementation of the activities of law enforcement agencies and courts, enforcement proceedings;
 - b. implementation of state statistical activities;
 - c. use by state bodies of personal data for statistical purposes with the obligatory condition of their depersonalization;
 - d. protection of constitutional rights and freedoms of man and citizen, if obtaining the consent of the User or his legal representative is impossible;
 - e. failure by the User to fulfill his obligations to provide personal data in accordance with the legislation of the Astana International Financial Center;
 - f. receipt by the state body that regulates, controls and supervises the financial market and financial organizations, information from individuals and legal entities in accordance with the legislation of the Astana International Financial Center;
 - g. in other cases established by the legislation of the Astana International Financial Center.

3. Subject of the Policy

- 3.1. The given Policy establishes the obligations of the Website administration to ensure the non-disclosure and protection of the confidentiality of personal data, which the User provides at the request of the Website administration.
- 3.2. Personal data permitted for processing under this Policy shall be provided by the User by completing the registration form on the website of the Private company Otokar Central Asia Limited shall include the following information:
 - 3.2.1. surname, first name and patronymic of the User;
 - 3.2.2. the contact telephone number of the User;
 - 3.2.3. e-mail address;
 - 3.2.4. the place of residence of the User.
- 3.3. The website protects Data that is automatically transferred during the viewing of advertising blocks and when visiting pages on which the statistical script of the system is installed ("pixel"): • IP address; • information from cookies; • information about the browser (or other program that accesses the display of advertising); • access time; • address of the page on which the advertising block is located; • reference (address of the previous page).
 - 3.3.1. Disabling cookies may cause access to parts of the website site that require authorization.
 - 3.3.2. The website collects statistics on the IP addresses of its visitors. This information is used to identify and resolve technical problems and to control the legality of financial payments.
- 3.4. Any other personal information not specified above (browsers and operating systems used, etc.) is subject to reliable storage and non-proliferation.

4. Purposes of collecting personal user information

- 4.1. The Website administration may use the User's personal data for the purposes of:
 - 4.1.1. Identification of the User registered on the website of the private company Otokar Central Asia Limited.
 - 4.1.2. Providing the User with access to personalized website resources.
 - 4.1.3. Establishing feedback with the User, including sending notifications, requests regarding the use of the website, provision of services, processing of requests and requests from the User.
 - 4.1.4. Determination of the location of the User to ensure security and prevent fraud.
 - 4.1.5. Confirmation of the reliability and completeness of personal data provided by the User.
 - 4.1.6. To provide the User with effective client and technical support in case of problems related to the use of the website.
 - 4.1.7. Providing to the User, with his/her consent, product updates, special offers, price information, newsletters and other information on behalf of the website or on behalf of website partners.
 - 4.1.8. Advertising activity with the consent of the User.
 - 4.1.9. Granting User access to website partner websites or services in order to receive products, updates and services.

5. Methods and deadlines for processing personal information

- 5.1. The User's personal data shall be processed for an unlimited period, in any legal way, including in personal data information systems using automation tools or without the use of such tools.
- 5.2. In the event of the loss or disclosure of personal data, the Website administration shall inform the User of the loss or disclosure of personal data.
- 5.3. The Website administration shall take the necessary organizational and technical measures to protect the User's personal information from unlawful or accidental access, destruction, alteration, blocking, copying, distribution, as well as other unlawful actions of third parties.
- 5.4. The Website administration together with the User shall take all necessary measures to prevent losses or other negative consequences caused by the loss or disclosure of the User's personal data.

6. Obligations of the parties

- 6.1. The User shall:
 - 6.1.1. To provide information on personal data necessary for the use of the website of the Private company Otokar Central Asia Limited.
 - 6.1.2. To update and supplement the provided information on personal data in the event of a change in this information.
- 6.2. The Website administration shall:
 - 6.2.1. To use the information received solely for the purposes indicated in Section 4 of this Policy.
 - 6.2.2. To ensure that confidential information is kept secret, that it is not disclosed without the prior written permission of the User, and that the transferred personal data of the User is not sold, exchanged, published or disclosed in other possible ways.
 - 6.2.3. To take precautions to protect the confidentiality of the User's personal data in accordance with the procedure usually used to protect such information in existing business operations.
 - 6.2.4. To block personal data relating to the relevant User from the time of the request or appeal of the User or its legal representative or the authorized body for the protection of the rights of subjects of personal data for the period of review, in the event of the discovery of inaccurate personal data or illegal actions.

7. Responsibilities of the parties

- 7.1. The Website administration that failed to perform its obligations shall be liable for losses incurred by the User in connection with the unlawful use of personal data in accordance with the legislation of the Astana International Financial Center.
- 7.2. The event of the loss or disclosure of Confidential Information, the Website administration shall not be liable if such confidential information:
 - 7.2.1. It became public property before its loss or disclosure.
 - 7.2.2. It was received from a third party prior to its receipt by the Website administration.
 - 7.2.3. It was disclosed with the consent of the User.

8. Settlement of disputes

- 8.1. A claim (a written proposal on voluntary settlement of the dispute) must be filed before filing a claim in court on disputes arising from the relations between the User of the website and the Administration of the website.
- 8.2. Within 30 calendar days of receiving the claim, the claimant shall be notified in writing of the results of the claim.
- 8.3. If no agreement is reached, the dispute will be referred to a judicial authority in accordance with the effective legislation of the Astana International Financial Center.
- 8.4. Effective legislation of the Astana International Financial Center shall apply to this Policy and the relations between the User and the Website administration.

9. Additional conditions

- 9.1. The Website administration may amend the Policy without the consent of the User.
- 9.2. The new Policy shall take effect from the time it is posted on the site, unless otherwise provided by the new version of the Policy.