**PERSONAL DATA PROCESSING POLICY**

**1. General provisions**

The Personal Data Processing Policy (hereinafter referred to as the Policy) governs the legal relationship regarding the processing of personal data between **IBC LLP Group International ",** BIN 230740021619, Republic of Kazakhstan, 050010, Almaty , BC "Ken Dala", Dostyk Avenue, 38, Office No. A3, 4th floor " Infinity" Space » (hereinafter referred to as the Company), Agent in the Russian Federation - IP Akhmedzyanov Stanislav Marselevich INN 745301540155 and the User of the site (hereinafter referred to as the User).

When processing personal data, the Company and the Agent are guided by the Law of the Republic of Kazakhstan dated May 21, 2013 No. 94-V “On Personal Data and Their Protection”, **Federal Law of the Russian Federation dated July 27, 2006 No. 152-FZ “On Personal Data” .** other legislative acts of the Republic of Kazakhstan and local regulatory legal acts,

All questions regarding the Policy and/or processing of personal data are sent to the Company’s general (centralized) email address (e- mail ): [info @ caws . Asia](mailto:info@caws.asia)

**1. Terms and definitions**

1.1. “User” means a legally capable individual who has reached the age of 18 and wants to order the Company’s services, leave a comment, register on the Site, or perform other actions provided for by the functionality of the Company’s Internet resource.

1.2. The “Site” or “Internet resource of the Company” means the site https://caws.asia/  taking into account all levels of domain names owned by the Company and forming part of the Company’s software.

1.3. “Personal data” means any information relating to a directly or indirectly identified or identifiable individual (citizen), recorded on electronic, paper and (or) other tangible media or directly defined in the legislation of the Republic of Kazakhstan.

1.4. “Personal data processing” means any action (operation) or set of actions (operations) with personal data performed using automation tools or without the use of such means. Such actions (operations) include: collection, receipt, recording, systematization, accumulation, storage, clarification (updating, changing), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data .

1.5. All other terms and definitions used in the Policy are interpreted in accordance with the current legislation of the Republic of Kazakhstan.

**2** . **Agreement with the Policy**

2.1. The User agrees to the Policy by placing a consent mark in the dialog box of the Site “I agree to the processing of personal data” and/or by simultaneously entering his name (last name - at the User’s request), email address (email) and mobile phone number in the dialog boxes windows provided by the functionality of the Site.

2.2. Do not use the Site if you do not agree with the provisions and scope of the Policy.

**3. Scope of application**

3.1. The Policy determines the procedure for processing personal data of Users of the Site, the conditions and principles of processing personal data, the rights of Users and the obligations of the Company, information about the measures taken to protect the processed personal data.

3.2. The Policy applies to all personal data provided by the User.

3.3. The Policy applies only to the applicable Company Site. The Company does not control and is not responsible for third party websites that the User can access via links available on the Company Website.

3.4. The Company processes the data provided by the User for the following purposes (including, but not limited to, depending on the functionality and purposes of use of the Site by the User):

(a) communications at the User’s request, consultation on the provision of services by the Company, satisfaction of the User’s request - within 3 years from the date of the last active action;

(b) evaluation and analysis of the operation of the Company’s Website, improving the quality of services - until consent is withdrawn, or within 3 years from the date of the last active action;

(c) conducting an analysis of the audience, its preferences and interests, and other marketing research, including with the involvement of third parties as a contractor (performer, consultant) - until consent is withdrawn or within 3 years from the date of the last active action;

(d) provision of other services available for use through the functionality of the Site.

**4. User rights**

4.1. The consent provided by the User to the processing of personal data is valid from the day such consent is provided until the purposes of processing are achieved or the User withdraws consent, unless otherwise provided by the current legislation of the Republic of Kazakhstan.

4.2. In accordance with the legislation of the Republic of Kazakhstan, the User has the right to receive information regarding the processing of his personal data, to change data, to receive information about the provision of personal data to third parties, to submit a request to stop processing personal data and (or) delete it, to appeal actions (inaction) and decisions of the Company related to the processing of personal data, to withdraw consent to the processing and transfer of personal data, except for cases where personal data is processed on the basis of law or other grounds other than consent.

4.3. The User may at any time revoke the consent provided to the Company in the manner established by the legislation of the Republic of Kazakhstan and the Russian Federation. The address for sending an application for withdrawal of consent to the processing of personal data [is info @ caws . Asia](mailto:info@caws.asia)

4.4. The user has the right to limit or prohibit the use of cookie technology by applying the appropriate settings in his browser. Please note that disabling cookies may, in some cases, result in limited functionality of the Sites.

**5. Processing of personal data**

5.1. Personal data of Users is processed by the Company.

5.2. When using the functionality of the Site, the User may provide the Company and, accordingly, the Company processes the following categories of personal data of users: public, special, with the exception of biometric and genetic, as well as other personal data not related to public and special personal data.

5.3. We process the required minimum of users’ personal data for the purposes provided for in the Policy, including, but not limited to (depending on the functionality of the Site):

(a) personal information: first name, last name;

(b) contact information: the User’s email address, the User’s mobile phone number;

(c) the user belongs to a legal entity, company, business segment;

(d) information about feedback forms, complaints, reviews: content of the appeal (if it contains personal data);

(e) additional information (may in some cases be collected automatically depending on the functionality of the Site and the User’s personal settings in the appropriate browser): IP address, cookies, geolocation, information about visiting the Site provided by statistics services (for example, such as Yandex Metrika and Google Analytics or similar), usage and settings information, device information, server log information, and other system-level information.

5.4. By providing his personal data, the User agrees to their processing (up to the User’s withdrawal of his consent to the processing of personal data), including collection, storage, depersonalization, transfer to third parties in cases provided for by the Policy and legislation of the Republic of Kazakhstan, in order to provide the User with advertising and reference information , services in accordance with the functionality of the Site and for other purposes provided for by the Policy and legislation of the Republic of Kazakhstan.

**6.Protection of personal data**

6.1. The Company does not verify the data provided or specified by the User. In this regard, the Company assumes that when submitting personal data the User:

(a) is a person with legal capacity.

(b) indicates reliable information about himself (or about the incapacitated person he represents);

(c) independently maintains the submitted personal data up to date;

(d) understands that information on the Site posted by the User may become available to other persons and may be copied or distributed by such users in cases provided for in the Policy.

6.2. The company processes personal data based on the following principles:

(a) legality;

(b) limiting the processing of personal data to the achievement of specific pre-defined legitimate purposes;

(c) preventing the processing of personal data incompatible with the purposes of collecting and/or storing data received from the User;

(d) compliance of the content and volume of the processed personal data with the purposes of their processing;

(e) preventing the processing of data that is redundant in relation to the purposes of processing;

(f) ensuring the accuracy, sufficiency and relevance of personal data in relation to the purposes of their processing;

(g) destruction or depersonalization of personal data in order to prevent their disclosure when the purposes of data processing are achieved, the need for such processing is lost, or when the User receives a request to destroy personal data or receives an application to revoke consent to the processing of personal data.

6.3. When processing personal data, the Company takes necessary and sufficient organizational and technical measures to protect personal data from unauthorized access to it, as well as from other unlawful actions in relation to personal data, provided for by the legislation of the Republic of Kazakhstan and its internal policies and procedures.

6.4. The processing of personal data of Users is carried out by the Company taking into account the following:

(a) Processing of Users’ personal data is carried out using databases on the territory of the Republic of Kazakhstan.

(b) Processing of personal data is carried out both using automated means and without their use.

(c) The Company undertakes not to transfer information received from the User to third parties, except in cases specifically provided for in the Policy or directly provided for in the legislation of the Republic of Kazakhstan.

(d) Storage of Users’ personal data is carried out on electronic media, and for the purpose of fulfilling obligations to Users it can be carried out on tangible media after retrieving personal data.

(f) Personal data is stored within the period objectively necessary to fulfill obligations to Users.

**7. Transfer of personal data**

7.1. Certain personal data, namely personal, contact, payment information may be transferred to legal entities or individual entrepreneurs who are engaged by the Company to fulfill obligations to Users, as well as for other purposes provided for by the Policy and/or legislation of the Republic of Kazakhstan.

7.2. If it is necessary to transfer personal data of Users to third parties - partners of the Company in cases, such transfer is carried out in compliance with the following conditions:

(a) a third party partner of the Company ensures the 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 the personal data of Users without their consent;

(b) a third party partner of the Company guarantees compliance with the following measures to ensure the security of personal data during their processing: use of information security tools; detection and recording of facts of unauthorized access to personal data and taking measures to restore personal data; restriction of access to personal data; control and assessment of the effectiveness of measures taken to ensure the security of personal data and other measures provided for by law;

(c) a third party – the Company’s partner – is prohibited from transferring and distributing Users’ personal data.

**8. Final provisions**

8.1. The Company undertakes to take all necessary organizational and technical measures to ensure the confidentiality, integrity, safety and availability of Users’ personal data.

8.2. The Company has the right to make changes and/or additions to the Policy at any time. The current text of the Policy is posted on the Site. Continued use of the Site or its services after the publication of a new version of the Policy means acceptance of the Policy and its terms by the User.