

Personal Data Processing and Privacy Policy

1. General Provisions

This Personal Data Processing and Privacy Policy (the **“Policy”**) describes how **Hostlab LLP** (the **“Company”**, **“Owner”**, **“we”**, **“us”**, or **“our”**) collects, uses, processes, stores, and protects personal data.

This Policy has been developed in accordance with the **Law of the Republic of Kazakhstan No. 94-V dated May 21, 2013 “On Personal Data and Their Protection”** and reflects generally accepted international privacy practices for online services.

This Policy applies to all websites, services, products, and platforms operated by the Company (collectively, the **“Services”**).

The Company may provide links to third-party websites. The Company does not control and is not responsible for the privacy policies, practices, or content of such third-party websites.

2. Definitions

For the purposes of this Policy, the following terms shall have the meanings set forth below:

Personal Data means any information relating to an identified or identifiable individual.

Processing of Personal Data means any operation performed on personal data, including collection, recording, storage, organization, structuring, modification, use, disclosure, transmission, anonymization, blocking, or destruction.

Blocking of Personal Data means the temporary suspension of the processing of personal data.

Destruction of Personal Data means actions as a result of which it is impossible to restore the personal data..

Database means an organized collection of personal data stored in electronic or physical form.

Owner of the database containing personal data (hereinafter referred to as the Owner) means a state body, individual and (or) legal entity exercising, in accordance with the laws of the Republic of Kazakhstan, the right of possession, use and disposal of the database containing personal data.

Operator of the database containing personal data (hereinafter referred to as the Operator) means a state body, individual and (or) legal entity carrying out the collection, processing and protection of personal data.

Cookies are small data files sent by a web server and stored on a user’s device, which are returned to the server when the user accesses the website again.

3. Conditions for Collection and Processing of Personal Data

The Company collects and processes personal data only with the **Client’s consent** or on other lawful grounds permitted under applicable legislation.

Personal data may be collected and processed for the following purposes:

- identification and verification of the Client;
- provision and maintenance of the Company’s services;

- customer service and technical support;
- processing payments and billing;
- monitoring and improving service quality;
- sending informational or marketing communications related to the Services.

To fulfill the purposes described above, the Company may collect the following categories of personal data:

- full name;
- email address, telephone number, or fax number;
- identity document details;
- residential or mailing address;
- payment and billing details.

The Company ensures that the personal data collected is **adequate, relevant, and limited to what is necessary** for the purposes for which it is processed.

Databases containing personal data may not be merged if their processing purposes are incompatible.

Personal data is processed only for the period necessary to achieve the purposes described in this Policy or until the Client withdraws consent where applicable.

The Company's website uses **cookies** that are necessary for the proper functioning and operation of the website.

4. Personal Data Protection

The Company implements appropriate **technical, organizational, and legal measures** to ensure the confidentiality, integrity, and security of personal data.

Personal data will not be disclosed to third parties without the Client's consent, except where such disclosure is required by applicable law, regulation, or by a competent governmental authority.

The Company maintains a security system designed to protect personal data against unauthorized access, modification, disclosure, or destruction.

5. Client Rights

Clients have the following rights regarding their personal data:

- to obtain information about personal data processed by the Company;
- to make changes to their personal data;
- to request deletion of their personal data;
- to withdraw previously granted consent to data processing;
- to request the restriction or blocking of personal data processing if such processing violates applicable legislation;

- to request destruction of personal data collected or processed in violation of applicable laws.

Clients are responsible for providing **accurate and up-to-date personal data** and must update such information when necessary.

6. Rights and Responsibilities of the Company

The Company has the right to:

- collect and process personal data in accordance with applicable legislation;
- independently determine the necessary measures to ensure personal data protection;
- continue processing personal data where permitted by law even after the Client withdraws consent.

The Company is obligated to:

- provide the Client or their legal representative with the **opportunity to access** personal data relating to them free of charge;
- respond to requests for modification, blocking, or deletion of personal data within **one business day**, where required by law;
- ensure public access to this Policy;
- fulfill all other obligations established by applicable legislation.

7. Publication and Updates of the Policy

This Policy is published on the Company's website to ensure transparency and accessibility.

The Company reserves the right to modify or update this Policy at any time.

Any changes to the Policy become effective upon publication on the Company's website.

The Company does not provide additional notifications regarding updates to this Policy, and Clients are responsible for periodically reviewing the Policy to stay informed of any changes.