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PRIVACY POLICY

This Privacy Policy (hereinafter — the "Policy") has been developed in accordance with the Law of the Republic of Kazakhstan "On Personal Data and Their Protection" and governs the processing and protection of the personal data of users who provide their data when using the "Wraxa" online platform, administered by Wraxa Limited Liability Partnership.

Use of the Platform means the User's unconditional agreement with this Policy and the terms of processing of the User's personal data set out in it.

This Policy applies to all information that the Operator may obtain about users of the "<https://wraxa.ai>" Platform.

1. Terms and Concepts Used in this Policy:

- 1) Operator – Wraxa LLP, which carries out the collection and processing of personal data and is the owner of the database of personal data of the Platform's users;
- 2) User – an individual or a legal entity, regardless of its organizational and legal form or form of ownership, that has registered on the "Wraxa" Platform to create a business-card site or an online store.
- 3) personal data – any information that makes it possible, directly or indirectly, to identify an individual or a legal entity: surname, first name, patronymic; contact and payment data (within the framework of carrying out a transaction), information about technical devices.
- 4) collection of personal data – actions aimed at obtaining personal data;
- 5) processing of personal data – actions aimed at the accumulation, storage, alteration, supplementation, use, dissemination, de-identification, blocking, and destruction of personal data;
- 6) database of personal data – a set of organized personal data.

2. General Provisions

2.1. This Policy applies to all personal data that the Operator may obtain from Users through their use of the Platform, including:

- 1) registration of an account (Personal Account);
- 2) arranging and paying for access to the Platform.

2.2. The purpose of the processing of personal data is:

- 1) registration and identification of the User;

- 2) providing access to the services of the Platform;
- 3) maintaining feedback, processing inquiries and notifications;
- 4) performance of obligations under agreements;
- 5) conducting marketing;
- 6) compliance with the requirements of the legislation of the Republic of Kazakhstan.

3. Purpose of Collecting Personal Data

3.1. The Operator may use information obtained in the course of rendering services for the following purposes:

- 1) to ensure servicing of Users, including the creation and management of users' Personal Accounts, the resolution of technical issues, and access to various features;
- 2) to communicate with the User, including on matters of service, customer support, satisfaction with the operation of the Platform, and the quality of the services received through the Platform;
- 3) to ensure compliance with the user agreement posted on the Platform.

3.2. The Operator may retain the information it collects and receives on the Platform for as long as is required to fulfill business purposes. The Operator also does not transfer personal data, except in cases where the information is requested by authorized state bodies of the Republic of Kazakhstan on the basis of a relevant request.

4. Basic Rights and Obligations of the Operator

4.1. The Operator has the right to:

- 1) receive from the personal data subject accurate information containing personal data;
- 2) independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of the obligations provided for by the Law on Personal Data and the regulatory legal acts adopted pursuant to it, unless otherwise provided by the Law on Personal Data or other regulatory legal acts.

4.2. The Operator must:

- 1) approve the list of personal data necessary and sufficient for the performance of the tasks it carries out, unless otherwise provided by the laws of the Republic of Kazakhstan;
- 2) take and comply with the necessary measures, including legal, organizational, and technical measures, to protect personal data in accordance with the legislation of the Republic of Kazakhstan;
- 3) comply with the legislation of the Republic of Kazakhstan on personal data and their protection;
- 4) provide, at the request of an authorized state body within the framework of the consideration of inquiries from individuals and legal entities, information on the methods and procedures used to ensure the Operator's compliance with the requirements of this Law;

- 5) take measures to destroy personal data upon achievement of the purpose of their collection and processing, and in other cases established by this Law and other regulatory legal acts of the Republic of Kazakhstan;
- 6) provide evidence of having obtained the subject's consent to the collection and processing of the subject's personal data in cases provided for by the legislation of the Republic of Kazakhstan;
- 7) upon the subject's inquiry, communicate information relating to the subject within the periods provided for by the legislation of the Republic of Kazakhstan;
- 8) in the event of a refusal to provide information to the subject or the subject's legal representative, provide a reasoned response within the periods provided for by the legislation of the Republic of Kazakhstan;
- 9) within one business day: alter and (or) supplement personal data on the basis of relevant documents confirming their accuracy, or destroy personal data where their alteration and (or) supplementation is not possible; block personal data relating to the subject in the event of information indicating a violation of the terms of their collection or processing; destroy personal data in the event of confirmation of the fact that they were collected or processed in violation of the legislation of the Republic of Kazakhstan, and in other cases established by this Law and other regulatory legal acts of the Republic of Kazakhstan; lift the blocking of personal data in the event that the fact of a violation of the terms of collection or processing of personal data is not confirmed.
- 11) provide the subject or the subject's legal representative, free of charge, with the opportunity to review the personal data relating to that subject.

4.3. The User has the right to:

- 1) know whether the operator, as well as a third party, holds the User's personal data, and to receive information containing: confirmation of the fact, purposes, sources, and methods of collection and processing of personal data; the list of personal data; the periods of processing of personal data, including the periods of their retention;
- 2) demand that the operator alter and supplement the User's personal data where there are grounds confirmed by relevant documents;
- 3) demand that the operator, as well as a third party, block the User's personal data in the event of information indicating a violation of the terms of collection or processing of personal data;
- 4) demand that the operator, as well as a third party, destroy the User's personal data whose collection and processing were carried out in violation of the legislation of the Republic of Kazakhstan, and in other cases established by this Law and other regulatory legal acts of the Republic of Kazakhstan;
- 5) withdraw consent to the collection, processing, dissemination in publicly available sources, transfer to third parties, and cross-border transfer of personal data, except in cases provided for by paragraph 2 of Article 8 of the Law of the Republic of Kazakhstan "On Personal Data and Their Protection";
- 6) give consent to (or refuse) the operator to disseminate the User's personal data in publicly available sources of personal data;
- 7) to exercise other rights provided for by this Law and other laws of the Republic of Kazakhstan.

4.4. The User must:

- 1) provide accurate data about themselves;
- 2) be responsible for any information posted on the site or online store created by means of the Platform;
- 3) obtain the consent of persons whose data will be used by them or posted on the site or online store created by them by means of the Platform, and, in the event such consent is not obtained, independently bear responsibility to those persons for the provision of their data without their consent.

Persons who have provided the Operator with inaccurate information about themselves, or information about another personal data subject without the latter's consent, shall be liable in accordance with the legislation of the Republic of Kazakhstan.

5. Principles of Processing Personal Data

5.1. The processing of personal data is limited to the achievement of specific, predetermined, and lawful purposes. The processing of personal data that is incompatible with the purposes of its collection is not permitted.

5.2. Only personal data that meets the purposes of its processing is subject to processing.

5.3. When processing personal data, the Operator ensures compliance with the principles provided for in Article 5 of the Law of the Republic of Kazakhstan "On Personal Data and Their Protection".

6. Liability

6.1. The Operator does not verify the accuracy of the personal data provided but proceeds on the assumption that the User provides accurate, sufficient, and up-to-date information.

6.2. The User bears responsibility for the consequences caused by the provision of inaccurate data.

6.3. The Operator is not liable for the actions of third parties (partners, providers, banks, and others) that have obtained access to the User's personal data under an agreement, provided that they comply with the requirements of the legislation on the protection of personal data and that confidentiality agreements are in place with them.

7. Final Provisions

7.1. The User may obtain any clarifications on matters of interest relating to the processing of the User's personal data by contacting technical support via the email address support@wraxa.ai.

7.2. This Policy remains in effect indefinitely until replaced by a new version. Amendments and additions to this Policy are permitted by way of publication.