



**OQAM FINANCE LTD.
DATA PROTECTION AND PRIVACY POLICY**

Approved by the decision
of Board of Directors
dated 19.09.2024

September 2024

1. Introduction

1.1. OQAM Finance Ltd. (hereinafter called the “Company”), a company incorporated in Astana International Financial Centre (‘AIFC’), with registration number AFSA-O-CA-2024-1200, having its registered address Kazakhstan, Astana, ave. Mangilik El 55/23, Block C4.4, office 345, is authorised by the Astana Financial Services Authority (“AFSA”) under the Acting Law of the AIFC for the provision of Dealing in Investments as Principal, Dealing in Investments as Agent, Advising on Investments, Arranging Deals in Investments, Managing Investments, Managing a Collective Investment Scheme and Arranging Custody services with AFSA license number AFSA-A-LA-2024-0023.

1.2. The purpose of this Data Protection and Privacy Policy (‘Policy’) is to inform the client about the ways the Company handles and protects client’s personal data complying with the applicable act of AIFC and the applicable legislation of the Republic of Kazakhstan and to illustrate, in connection with the protection of natural persons with regard to the processing of personal data and on the free movement of such data, what information we collect and why, as well as how we utilize it and what options on the website our clients can access.

2. Definitions

2.1. **Personal Data** means any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

2.2. **Processing** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

2.3. **Controller** means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

2.4. **Processor** means a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

2.5. **Cookie** refers to a small piece of text that websites send to the browser, and which is stored on the User's terminal, which may be a personal computer, a mobile phone, a tablet, etc. These files allow the website to track, personalize, and save information about each User's session, such as language and preferred options, which can make his/her next visit easier and make the site more useful for him/her.

3. General principles

3.1. The Company is committed to your data protection and data privacy. We recommend you read the present Policy to better understand what information we collect, how we use it, and who we may share it with. Additionally, this Policy will provide you with details on how you can control the use and disclosure of your information.

3.2. The Company is considered a "data controller" as it relates to any Personal Data or Personal Information (as those terms are defined by applicable law) shared in connection with your use of our website, including your customer information, as applicable. By visiting, joining, or using the Company's websites or application, or otherwise indicating that you agree to this Policy which is available on the Company's website, you agree to, and authorize our use of your Personal Information as described in this Policy.

3.3. If you have any questions regarding the provisions of this Policy, please contact us via email: info@oqam.kz.

3.4. This Policy covers information collected by our Company through its websites and application and describes the Personal Data that we process and collect from website visitors and users or potential clients completing the onboarding process to become a client of the Company, Service Providers and third parties who perform functions for us, personnel who are our employees or authorized contractors, and job applicants.

3.5. For the purposes of this Policy, Personal Data means any information relating to an identified or identifiable natural person.

3.6. When collecting the personal data, the Company takes into consideration all the necessary organizational measures and principles governing the processing of personal data:

- it shall be subjected to legitimate and lawful processing in a transparent manner,
- it shall be collected for specified, express and legitimate purposes and shall not be subjected to further processing in any way incompatible with the purposes for which this data is collected by the Company,

- only the appropriate and relevant data shall be collected, limited to the necessary purpose for which it has been collected,
- it shall be accurate and updated as necessary,
- it shall be retained only for as long as required by the Law and for the purposes for which it has been collected,
- it shall be subjected to processing in a manner guaranteeing required security against non-authorised or unlawful processing and accidental loss, destruction or wear, among other things, through the use of suitable techniques and or organizational measures,
- when we transmit your personal data whether to another country or to a person who carries out the processing on behalf of the Company, the necessary measures shall be taken by us for the protection of your personal data, as for example through the conclusion of specialized contracts for data processing.

4. Data processing and autosaving

4.1. When Users browse the website, read its pages, and download the information contained in it, the website acquires some navigation data, the transmission of which is implicit in internet communication protocols.

4.2. This may include user IP addresses, type of browser used, access website addresses, pages visited within the site, access time, the code indicating the response status given by the server and other parameters relating to the operating system and the User's IT environment.

4.3. When clients or potential clients visit our website, the way you are doing right now, the web server collects and saves the following data:

- The address (URL) of the web page you visit;
- The used operating system;
- The browser and its version;
- Date and time;
- The address (URL) of the page you visited before (referrer URL);
- The hostname and the IP address of the device via which the website was accessed;
- Web server log files.

4.4. This data is needed to use web services and is not collected to be associated with identified data subjects but is used to make the site more useful for its visitors, to obtain aggregated and anonymous statistical information on the use of the site and to check its proper operation. No information on Users/visitors will be sold, shared or used for commercial purposes.

4.5. Web server log files tend to be stored for half-month and are deleted automatically when this period ends. We do not disclose this information to anyone, but the risk of this information being accessed by third parties illegally still exists.

5. Storage of personal data

5.1. Personal data that the visitors provide to our website, including name, postal address, email address, or other personal details when completing a form or leaving comments, along with the IP address and time, will only be utilized by us for the purpose mentioned here, will be stored securely and will not be obtained by third parties.

5.2. Consequently, we are making use of personal data for communication purposes only from users who are willing to contact and to offer the product and services provided on the website. We will not disclose personal details without your allowance, but it is not possible to exclude the risk of this information being accessed by someone else illegally.

5.3. In the case of sharing personal data via email, which implies that you do it outside our website, we cannot guarantee that it will be safe and secure. Our recommendation is to avoid sending confidential information by email with no encryption.

5.4. By using our website, you hereby consent to our Policy and agree to its terms.

5.5. It is possible to revoke the consent at any time you like by sending an informal email. The relevant contact details are provided in the present Policy.

6. TLS encryption with HTTPS

6.1. The Company utilizes HTTPS to spread the data over the internet in an interception-proof way, which means that the information is protected via technology by design. With the help of TLS (Transport Layer Security), an encryption protocol applied to spread data over the internet securely, we can guarantee that your data is protected and remains confidential. You can see that this data transmission security system is applied with a little lock symbol located in the browser's upper left corner as well as the "HTTPS" scheme used as a part of the website's address

7. USE OF COOKIES

7.1. To store user-specific data, our website utilizes HTTP cookies. A cookie happens to be a small package of information that the web browser and the web server exchange, but it has no meaning to them and is only utilized for the web application (e.g., online shopping – for the goods in a virtual shopping cart).

7.2. Cookies can be either first-party cookies built by our website or third-party cookies developed by other websites (e.g., Google Analytics).

7.3. It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using our website. We use:

Session cookies that enable the Company to process and memorize your transactions and requests during a given session on your account. These cookies are necessary in order to use the Services.

7.4. Researching how customers interact with our services (for example, statistical reports) allows us to improve the quality of OQAM Finance Ltd website, mobile application and services.

7.5. The Company retains the right to cooperate with any third party (include search engines, providers of measurement and analytics services, social media networks, and advertising companies) which may use its own tracking technologies to provide certain services or features, including targeted online marketing techniques such as attribution tracking, remarketing, and cross-device tracking. Such third parties may provide us with some statistical information about you (for example, your interests, information on your devices etc.), which help us to improve the adverts shown each time you visit the Company's website.

PLEASE NOTE THAT IF YOU REJECT OR BLOCK ALL COOKIES IN YOUR BROWSER SETTINGS, YOU WILL NOT BE ABLE TO TAKE FULL ADVANTAGE OF THE COMPANY'S SERVICES AS SOME COOKIES ARE NECESSARY FOR THE SITE TO FUNCTION PROPERLY.

8. CONFIDENTIALITY

8.1. We always treat personal data confidentiality and do not disclose your personal data to other clients, organizations or individuals, if such disclose do not necessary for providing the Company's services or conducting our business operations with you, as it is outlined in the purposes for processing of such data.

8.2. In addition to the disclosures outlined within this Privacy Policy we may disclose information about you:

- to the extent that we are required to do so by law;
- in connection with any legal proceedings or prospective legal proceedings;
- in order to establish, exercise or defend our legal rights - including providing information to others for the purposes of fraud prevention and reducing credit risk

WE WILL NEVER SELL YOUR PERSONAL INFORMATION TO ANY THIRD PARTY.

8.3. In addition, we may share data with trusted partners to contact you based on your request to receive such communications, help us perform statistical analysis, or provide customer support. Such third parties are prohibited from using your personal data except for these purposes, and they are required to maintain the confidentiality of your information. If you do not want us to share your personal data with these companies, contact us.

9. KEEPING YOUR PERSONAL DATA

9.1. We keep the information as no longer than it is reasonably necessary. If you do not want to use our services, you can close your profile and immediately delete your personal data.

9.2. We reserve the right to keep information that is reasonably necessary after closing of your account when it is required to comply with applicable tax/revenue laws, resolve disputes, and enforce our agreements. We will delete this information as soon as such data become no needed but no later than 3 years after the closure of your account

10. THIRD PARTY PRIVACY POLICIES

10.1. This Policy does not apply to other advertisers or websites. Thus, we are advising you to consult the respective Privacy Policies of these third-party ad servers for more detailed information. It may include their practices and instructions about how to opt-out of certain options.

10.2. You can choose to disable cookies through your individual browser options. To know more detailed information about cookie management with specific web browsers, it can be found at the browsers' respective websites.

11. DATA PROTECTION RIGHTS

11.1. We would like to make sure you are fully aware of all of your data protection rights. Every user is entitled to the following:

- The right to access – You have the right to request copies of your personal data. We may charge you a small fee for this service.
- The right to rectification – You have the right to request that we correct any information you believe is inaccurate. You also have the right to request that we complete the information you believe is incomplete.
- The right to erasure – You have the right to request that we erase your personal data, under certain conditions.
- The right to restrict processing – You have the right to request that we restrict the processing of your personal data, under certain conditions. When you have any objection to processing your personal data, you can do so by sending an email on info@oqam.kz.
- The right to object to processing – You have the right to object to our processing of your personal data, under certain conditions.
- The right to data portability – You have the right to request that we transfer the data that we have collected to another organization, or directly to you, under certain conditions.

11.2. We appreciate our clients, but also we appreciate their freedom of choice. You can withdraw your consent to our processing of your information and your use of the Services. You are able to do it at any time by closing your account by sending an email to info@oqam.kz to request that your personal information be deleted.

11.3. We are able to provide you with a copy of all the personal data that we have regarding you, in electronic format. You always have the ability and capacity to export your personal data collected or stored digitally concerning you as our customer by sending your request via email on info@oqam.kz.

11.4. If you reasonably believe that we are violating our responsibilities to protect your privacy, you have a right to lodge a complaint with a relevant supervisory authority. In any time, you may:

- withdraw your consent to use your personal data that you previously gave to us;
- You can request access to, removal and erasure of your personal data;
- You have right to make corrections, amendments and updates to your personal data;
- You can object to or restrict us in use of your personal information, if there is a disagreement about its accuracy, or we're not lawfully allowed to use it.

11.5. If you would like to port your data elsewhere (if the processing is being done by automated means, you may ask us to provide it to you or another service provider in a machine-readable format), you can contact the Company for assistance and we will respond to your request within 30 days.

11.6. You have a right to ask us to restrict the processing of some or all of your personal information if there is a disagreement about its accuracy, or we're not lawfully allowed to use it.

12. CHANGES TO THIS POLICY

12.1. We may update this Policy from time to time by posting a new version online. You should check this page occasionally to review any changes. If we make any material changes we will notify you by posting the revised Policy on our website and providing notice to your email corresponding to your account. This helps you to always be aware of what information we collect, how we use it and under what circumstances, if any, it is disclosed. Your continued use of the website and the Company's services, and/or continued provision of personal data to us you will be subject to the terms of the then-current Policy.