

# Privacy Policy of Digital Products of AIFC Authority (the “Policy”)

As of December 1, 2021

This policy describes processing of the information in support of Digital Resident, AFINA Mobile App, AFD Website, and the other digital products, features, apps, services, technologies, and software (the “Products”) offered by JSC Astana International Financial Centre Authority (“AIFCA”, “AIFC Authority”, “us”, “we” or “our”). This page informs users of the Products (“you” or “your”) of our policies regarding the collection, use, and disclosure of personal data when you use our Products and the choices you have associated with such data.

## Processing your Personal Data

We process your data to provide and improve the Products. By using the Products, you agree to the collection and use of Personal Data in accordance with this Policy. Unless otherwise defined in this Policy, terms used in the Policy have the same meanings as in our Terms and Conditions.

## Data Collection

We collect several different types of Personal Data for various purposes to provide and improve our Products to you.

## What Types Of Data We Collect:

We may collect Personal Data about you when you visit our Sites or use our Products, including the following:

**Registration and use of Personal Data** – When you register our Products by establishing an Account, we will collect Personal Data as necessary to offer and provide the Products you request. Depending on the Products you choose, we may require you to provide us with your name, postal address, telephone number, email address and identification information to establish an Account when registering as user. We may require you to provide us with additional Personal Data as you use our Products. Data that is requested for user registration (as applicable and available):

- First name
- Last name
- E-mail
- Phone
- Country
- Residency
- City
- Company
- Business Identification Number
- Individual Identification Number
- Position
- Industry
- Facebook accounts link
- LinkedIn account link
- Telegram account link
- User type

**Transaction and experience information** – When you use our Site and make payment for the applications, we collect Personal Data about the transaction, as well as other Personal Data associated with the transaction such as amount sent or requested, amount paid for products or services, merchant Personal Data, including information about any funding instruments used to complete the transaction, Device Information, Technical Usage Data, and Geolocation Information.

**Other Personal Data we collect related to your use of our Products** – We may collect additional Personal Data from or about you when you communicate with us, contact our customer support teams or respond to a survey.

## Who Do We Share Personal Data With?

We may share your Personal Data or other information about you with others in a variety of ways as described in this section of the Policy.

We may share your Personal Data with Astana Financial Services Authority (AFSA) for the purposes of processing and storing your applications and details about you which is powered by IT software and infrastructure maintained by “Astana International Financial Centre Authority” JSC.

We may also share your Personal Data with AIFC Business Connect Ltd. (a subsidiary company of the AIFCA, <https://bc.aifc.kz>) for the purposes of registration, post-registration and authorisation services and marketing:

- assistance and consultations for the application process;
- analysis of AIFC Participants database;
- preparation of tailored products to AIFC Participants and potential clients;
- communications with regards to news, upcoming events and products tailored to your needs.

By submitting your Personal Data you also agree for your data to be stored in other jurisdictions in accordance with the AIFC Data Protection Regulations No.10, 2017 and AIFC Data Protection Rules No. 1, 2018 (the “AIFC Data Protection laws”).

We may also share your Personal Data or information related to your user account, applications and other relevant information for the following reasons:

**With other AIFC Bodies and AIFCA subsidiary companies** : We may share your Personal Data with members of the AIFC corporate family to provide the Products you have requested or authorised, to manage risks, to help detect and prevent potentially illegal and fraudulent acts and to help us manage the availability and connectivity of Products, Services, and communications.

**With other companies that provide services to us:** We may share Personal Data with third-party service providers that perform services and functions at our direction and on our behalf. These third-party service providers may, for example, provide you the Products, verify your identity, assist in processing transactions, send you advertisements for our Products and Services, or provide customer support.

**With other parties to transactions when you use the Products, such as other Users, merchants, and their service providers:** We may share Personal Data with other participants to your transactions, including other Users you are sending or receiving funds from, and merchants or their service providers when you use the Products to pay for goods or services. The information includes:

- Personal Data necessary to facilitate the transaction;
- Personal Data to help you resolve disputes and detect and prevent fraud.

**With other third parties for our business purposes or as permitted or required by law:** We may share your Personal Data with other parties for AIFC Authority's business purposes or as permitted or required by law, including:

- if we need to do so to comply with a law, legal process or regulations;
- for compliance with law enforcement, requests of regulators, government officials, or other third parties (in Kazakhstan or elsewhere) in relation to a subpoena, court order, or other legal process or requirement under Kazakhstan law or regulation, or the laws and regulations of other jurisdictions that are applicable to AIFC Authority or one of its affiliates;
- when we need to do so to comply with such law or credit card rules; or when we believe, in our sole discretion, that the disclosure of Personal Data is necessary or appropriate to prevent physical harm or financial loss; or to report suspected illegal activity or to investigate violations of a Terms & Conditions;
- to protect our property, Products and legal rights;
- to help assess and manage risk and prevent fraud against us, our Users and fraud involving our Sites or use of our Products, including fraud that occurs at or involves our business partners, strategic ventures, or other individuals and merchants; and
- to support our audit, compliance, and corporate governance functions.

**With your consent:** We will share your Personal Data and other information with your consent or direction, which is implied to be provided by accepting this Policy.

Astana International Financial Centre Authority will take all steps reasonably necessary to ensure that your Personal Data is treated securely and in accordance with this Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate levels of protection (appropriate safeguards) including the security of your data and other Personal Data, as provided by AIFC Data Protection laws and other applicable laws.

In addition, AIFCA may provide aggregated statistical data to third-parties, including other businesses and members of the public, about how, when, and why Users visit our Sites and use our Products. This data will not personally identify you or provide information about your use of the Products. We do not share your Personal Data with third parties for their marketing purposes without your consent. AIFCA will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate levels of protection (appropriate safeguards) including the security of your data and other Personal Data, as provided by AIFC Data Protection laws and other applicable laws.

## **Why Do We Need Data:**

We may use the collected Personal Data for various purposes:

- to provide and maintain the Products;
- to notify you about changes to our Products;
- to allow you to participate in interactive features of our Service when you choose to do so;
- to provide customer care and support;
- to provide analysis or valuable Personal Data so that we can improve the Products;
- to monitor the usage of the Products;
- to detect, prevent and address technical issues.

## **How Do We Use Cookies and Tracking Technologies?**

When you visit our Sites, use our Products, or visit a third-party website for which we provide online Products, we and our business partners and vendors may use cookies and other tracking technologies (collectively, "Cookies") to recognize you as a User and to customize your online experiences, the Products you use, and other online content and advertising; measure the effectiveness of promotions and perform analytics; and to mitigate risk, prevent potential fraud, and promote trust and safety across our Sites and Products.

Do Not Track (DNT) is an optional browser setting that allows you to express your preferences regarding tracking by advertisers and other third-parties. We do not respond to DNT signals.

## **Disclosure Of Data**

We may disclose your Personal Data in the good faith belief that such action is necessary to:

- to comply with a legal obligation;
- 
- to prevent or investigate possible wrongdoing in connection with the Service;
- to protect the safety of users of the Service or the public;
- to protect against AIFCA legal liability which can be imposed by wrongdoing in connection with Products.

## **How Do We Secure Your Data:**

The security of your Personal Data is important to us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## **How Long Do We Store Your Data:**

The information that we request will be retained by us indefinitely and used as described in this Policy till your request to delete Account.

## **How Can You Change Your Data:**

You can contact us at any time with a request regarding the rectification, deleting, or blocking of Personal Data.

## **Service Providers**

We may employ third party companies and individuals to facilitate our Products ("Service Providers"), to provide the Products on our behalf, to perform Products-related services or to assist us in analysing how our Products are used.

These Service Providers have access to your Personal Data only to perform Products-related services or to assist us in analysing how our Products are used on our behalf and are obligated not to disclose or use it for any other purpose.

## **Links To Other Sites**

Our Products may contain links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third party Sites or Products.

## Children's Privacy

Our Products do not address anyone under the age of 18 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children have provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

## How Can We Change This Privacy Policy

We may update this Policy from time to time. We will notify you of any changes by posting the new privacy policy on this page.

You are advised to review this Policy periodically for any changes. Changes to this Policy are effective when they are posted on this page.

## How Can We Transfer of Your Personal Data to Other Countries

Our operations are supported by a network of computers, cloud-based servers, and other infrastructure and information technology, including, but not limited to, third-party service providers. We store and Process your Personal Data in accordance with applicable laws. We will protect your Personal Data in accordance with applicable laws if your Personal Data is transferred to countries other than Kazakhstan. By using our Sites and Products, you consent to your Personal Data being transferred to countries other than Kazakhstan, including countries that have different data protection rules than Kazakhstan. We do not represent that our Sites and Products are appropriate or available in any particular jurisdiction.

## How Can You Lodge A Complaint:

You have the right to file a complaint if you are not positively assured by the processing of data and/or have not received information about the rectification, deleting, or blocking of Personal Data.

## Contact Us

If you have any questions about this Policy, please contact Digital Department of AIFCA by email: [digital@aifc.kz](mailto:digital@aifc.kz).

## Definitions

**Account** means an AIFC Authority potential client account.

**AIFC Bodies** refer to the AIFC Management Council, the Governor of the AIFC, AIFCA, AFSA, the AIFC Court, the International Arbitration Centre.

**AIFC Corporate family** means a group consisting of the AIFC Bodies and their organisations.

**AIFC Participants** mean legal entities registered under the Acting Law of the AIFC and legal entities recognised by the AIFC.

**AFD Website** means web-based Product where the international event Astana Finance Days is held annually.

**AFINA Mobile App** means mobile application Product [that offers customers tools and information for getting the services they need.](#)

**Astana Finance Days** mean multi-day finance forum, held annually by the Astana International Financial Center.

**Device Information** means data that can be automatically collected from any device used to access the Sites or Products. Such information may include, but is not limited to, your device type; your device's network connections; your device's name; your device's IP address; information about your device's web browser and the Internet connection being used to access the Site or Products; Geolocation Information; information about apps downloaded to your device; and biometric data (e.g., Touch ID/Fingerprint to verify your identity).

**Digital Resident** means [a self-service portal that offering customers tools and information for getting the services they need.](#)

**Geolocation Information** means information that identifies with reasonable specificity your location by using, for instance, longitude and latitude coordinates obtained through GPS, Wi-Fi, or cell site triangulation. Some of our Products may ask you for permission to share your current location. Some of the Sites and Products require this information to provide a specific product or online Products. If you do not agree to our collection of the geolocation information, our Sites or Products may not function properly when you try to use them.

**Guest Transaction** means the process when a user of our product can use various Services in a limited amount, unlike a registered user.

**Personal Data** means personal information that can be associated with an identified or identifiable person. "Personal Data" can include name, postal address (including billing and shipping addresses), telephone number, email address, payment card number, other financial account information, account number, date of birth, and government-issued credentials (e.g., driver's license number, national ID, passport, Individual Identification Number, Business Identification Number, Social Security number and Taxpayer ID). Personal Data does not include information that does not identify a specific User.

**Process** means any method or way that we handle Personal Data or sets of Personal Data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, and consultation, disclosure by transmission, disseminating or otherwise making available, alignment or combination, restriction, erasure or destruction of Personal Data.

**Products** mean any products, services, content, features, technologies, or functions, and all related websites, applications and services offered to you by AIFC Authority in connection with an Account or Guest Transaction.

**Services** refer to any information and services provided over the Internet and offline using the Products.

**Sites** mean the websites, mobile apps, official social media platforms, or other online properties through which AIFC Authority offers the Services and which has posted or linked to this Policy.

**Technical Usage Data** means information we collect from your phone, computer or other device that you use to access the Sites or Products. Technical Usage Data tells us how you use the Sites and Products, such as what you have searched for and viewed on the Sites and the way you use our Products, including your IP address, statistics regarding how pages are loaded or viewed, the websites you visited before coming to the Sites and other usage and browsing Personal Data collected through Cookies.

**User** means an individual who uses the Products and Services or accesses the Sites and has established a relationship with AIFC Authority (for example, by opening an Account and agreeing to the AIFC Authority Policy) or otherwise uses the Services and Products as a buyer, seller or other type of participant to a transaction, including a Guest Transaction.

**Updated Privacy Statement for AIFC Authority Products**

This version of the statement will take effect on December 1, 2021.

Effective Date: December 1, 2021