

# Personal data processing policy

## 1. General Provisions

This personal data processing policy has been drawn up in accordance with the requirements of the Federal Law of 27.07.2006. No. 152-FZ "On Personal Data" (hereinafter referred to as the Personal Data Law) and defines the procedure for processing personal data and measures to ensure the security of personal data taken by [hsetech](https://hsetech.kz) (hereinafter referred to as the Operator).

1.1. The Operator sets as its most important goal and condition for the implementation of its activities the observance of the rights and freedoms of man and citizen when processing his personal data, including the protection of the rights to privacy, personal and family secrets.

1.2. This Operator policy regarding the processing of personal data (hereinafter referred to as the Policy) applies to all information that the Operator may receive about visitors to the website <https://hsetech.kz> .

## 2. Basic concepts used in the Policy

2.1. Automated processing of personal data is the processing of personal data using computer technology.

2.2. Blocking of personal data is a temporary cessation of the processing of personal data (except in cases where the processing is necessary to clarify personal data).

2.3. Website — a collection of graphic and information materials, as well as computer programs and databases, ensuring their availability on the Internet at the network address <https://hsetech.kz> .

2.4. Personal data information system is a set of personal data contained in databases and the information technologies and technical means that ensure their processing.

2.5. Depersonalization of personal data — actions as a result of which it is impossible to determine, without the use of additional information, the ownership of personal data by a specific User or other subject of personal data.

2.6. Processing of personal data — any action (operation) or set of actions (operations) performed with the use of automation tools or without the use of such tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (distribution, provision, access), depersonalization, blocking, deletion, destruction of personal data.

2.7. Operator — a state body, municipal body, legal entity or individual that independently or jointly with other persons organizes and/or carries out the processing of personal data, as well as determines the purposes of processing personal data, the composition of personal data subject to processing, actions (operations) performed with personal data.

2.8. Personal data – any information relating directly or indirectly to a specific or identifiable User of the website <https://hsetech.kz> .

2.9. Personal data permitted for distribution by the subject of personal data are personal data, access to which by an unlimited number of persons is granted by the subject of personal data by giving consent to the processing of personal data permitted by the subject of personal data for distribution in the manner prescribed by the Law on Personal Data (hereinafter referred to as personal data permitted for distribution).

2.10. User – any visitor to the website <https://hsetech.kz> .

2.11. Provision of personal data – actions aimed at disclosing personal data to a specific person or a specific group of persons.

2.12. Dissemination of personal data — any actions aimed at disclosing personal data to an indefinite number of persons (transfer of personal data) or familiarizing an unlimited number of persons with personal data, including the publication of personal data in the media, posting in information and telecommunications networks or providing access to personal data in any other way.

2.13. Cross-border transfer of personal data is the transfer of personal data to the territory of a foreign state to a foreign government body, a foreign individual or a foreign legal entity.

2.14. Destruction of personal data — any actions as a result of which personal data are destroyed irrevocably with the impossibility of further restoration of the content of personal data in the personal data information system and/or the destruction of tangible media of personal data.

### 3. Basic rights and obligations of the Operator

3.1. The operator has the right:

— receive from the subject of personal data reliable information and/or documents containing personal data;

— in the event of the personal data subject's withdrawal of consent to the processing of personal data, as well as the sending of an appeal with a request to stop the processing of personal data, the Operator has the right to continue processing personal data without the consent of the personal data subject if there are grounds specified in the Law on Personal Data;

— independently determine the composition and list of measures necessary and sufficient to ensure the fulfillment of obligations stipulated by the Law on Personal Data and regulatory legal acts adopted in accordance with it, unless otherwise provided by the Law on Personal Data or other federal laws.

3.2. The operator is obliged to:

— provide the subject of personal data, at his request, with information concerning the processing of his personal data;

— organize the processing of personal data in accordance with the procedure established by the current legislation of the Russian Federation;

— respond to requests and inquiries from personal data subjects and their legal representatives in accordance with the requirements of the Law on Personal Data;

— notify the authorized body for the protection of the rights of personal data subjects, at the request of this body, of the necessary information within 10 days from the date of receipt of such request;

— publish or otherwise provide unlimited access to this Policy regarding the processing of personal data;

— take legal, organizational and technical measures to protect personal data from unauthorized or accidental access to them, destruction, modification, blocking, copying, provision, distribution of personal data, as well as from other illegal actions in relation to personal data;

— stop the transfer (distribution, provision, access) of personal data, stop processing and destroy personal data in the manner and cases stipulated by the Law on Personal Data;

— fulfill other obligations stipulated by the Law on Personal Data.

### 4. Basic rights and obligations of personal data subjects

4.1. Subjects of personal data have the right to:

- receive information regarding the processing of his personal data, except for cases stipulated by federal laws. Information is provided to the personal data subject by the Operator in an accessible form, and it should not contain personal data related to other personal data subjects, except for cases where there are legal grounds for disclosing such personal data. The list of information and the procedure for obtaining it are established by the Law on Personal Data;
- demand that the operator clarify his personal data, block it or destroy it if the personal data is incomplete, outdated, inaccurate, illegally obtained or is not necessary for the stated purpose of processing, and also take measures provided by law to protect his rights;
- to put forward the condition of prior consent when processing personal data for the purpose of promoting goods, works and services on the market;
- to revoke consent to the processing of personal data, as well as to send a request to stop the processing of personal data;
- appeal to the authorized body for the protection of the rights of personal data subjects or in court against the illegal actions or inaction of the Operator when processing his personal data;
- to exercise other rights provided for by the legislation of the Russian Federation.

4.2. Subjects of personal data are obliged to:

- provide the Operator with reliable information about yourself;
- inform the Operator about clarification (update, change) of your personal data.

4.3. Persons who have provided the Operator with false 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 Russian Federation.

## 5. Principles of personal data processing

5.1. The processing of personal data is carried out on a lawful and fair basis.

5.2. The processing of personal data is limited to achieving specific, predetermined and legitimate purposes. Processing of personal data that is incompatible with the purposes of collecting personal data is not permitted.

5.3. It is not permitted to combine databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other.

5.4. Only personal data that meets the purposes of their processing are subject to processing.

5.5. The content and volume of personal data processed correspond to the stated purposes of processing. Excessive amounts of personal data processed in relation to the stated purposes of their processing are not permitted.

5.6. When processing personal data, the accuracy of the personal data, their sufficiency, and, where necessary, relevance in relation to the purposes of processing the personal data are ensured. The operator takes the necessary measures and/or ensures their adoption to delete or clarify incomplete or inaccurate data.

5.7. Personal data shall be stored in a form that allows the subject of personal data to be identified, for no longer than is required by the purposes of processing personal data, unless the storage period for personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor. Processed personal data shall be destroyed or depersonalized upon achieving the purposes of processing or in the event of loss of need to achieve these purposes, unless otherwise provided by federal law.

## 6. Purposes of personal data processing

Purpose of processing	informing the User by sending emails
Personal data	philosophical beliefs
Legal basis	Federal Law "On Information, Information Technologies and Information Protection" dated 27.07.2006 N 149-FZ
Types of personal data processing	Transfer of personal data

## 7. Terms of personal data processing

7.1. The processing of personal data is carried out with the consent of the subject of personal data to the processing of his personal data.

7.2. The processing of personal data is necessary to achieve the goals stipulated by an international treaty of the Russian Federation or by law, to exercise the functions, powers and obligations imposed on the operator by the legislation of the Russian Federation.

7.3. The processing of personal data is necessary for the administration of justice, the execution of a judicial act, an act of another body or official subject to execution in accordance with the legislation of the Russian Federation on enforcement proceedings.

7.4. The processing of personal data is necessary for the performance of an agreement to which the subject of personal data is a party, beneficiary or guarantor, as well as for the conclusion of an agreement on the initiative of the subject of personal data or an agreement under which the subject of personal data will be a beneficiary or guarantor.

7.5. The processing of personal data is necessary for the exercise of the rights and legitimate interests of the operator or third parties or for the achievement of socially significant goals, provided that the rights and freedoms of the subject of personal data are not violated.

7.6. The processing of personal data is carried out, access to which by an unlimited number of persons is provided by the subject of the personal data or at his request (hereinafter referred to as publicly available personal data).

7.7. The processing of personal data is subject to publication or mandatory disclosure in accordance with federal law.

## 8. Procedure for collecting, storing, transferring and other types of processing personal data

The security of personal data processed by the Operator is ensured by implementing legal, organizational and technical measures necessary to fully comply with the requirements of current legislation in the field of personal data protection.

8.1. The operator ensures the safety of personal data and takes all possible measures to prevent unauthorized persons from accessing personal data.

8.2. The User's personal data will never, under any circumstances, be transferred to third parties, except in cases related to the implementation of current legislation or in the event that the subject of personal data has given consent to the Operator to transfer data to a third party for the fulfillment of obligations under a civil law contract.

8.3. In the event of detection of inaccuracies in personal data, the User may update them independently by sending the Operator a notification to the Operator's e-mail address it@hsecompany.kz with the subject line "Updating personal data".

8.4. The period of processing personal data is determined by the achievement of the purposes for which the personal data were collected, unless another period is provided for by the agreement or applicable law.

The User may at any time revoke their consent to the processing of personal data by sending a notification to the Operator via e-mail to the Operator's e-mail address it@hsecompany.kz with the subject line "Revocation of consent to the processing of personal data".

8.5. All information collected by third-party services, including payment systems, communication tools and other service providers, is stored and processed by the said persons (Operators) in accordance with their User Agreement and Privacy Policy. Subject of personal data and/or with the said documents. The Operator is not responsible for the actions of third parties, including the service providers specified in this clause.

8.6. Prohibitions established by the subject of personal data on the transfer (except for providing access), as well as on the processing or conditions of processing (except for obtaining access) of personal data permitted for distribution, shall not apply in cases of processing of personal data in state, public and other public interests determined by the legislation of the Russian Federation.

8.7. When processing personal data, the operator ensures the confidentiality of personal data.

8.8. The operator shall store personal data in a form that allows the identification of the subject of personal data for no longer than is required by the purposes of processing the personal data, unless the storage period for personal data is established by federal law, an agreement to which the subject of personal data is a party, beneficiary or guarantor.

8.9. The condition for termination of the processing of personal data may be the achievement of the purposes of processing personal data, the expiration of the consent of the subject of personal data, the withdrawal of consent by the subject of personal data or the requirement to terminate the processing of personal data, as well as the detection of unlawful processing of personal data.

## 9. List of actions performed by the Operator with the received personal data

9.1. The operator collects, records, systematizes, accumulates, stores, clarifies (updates, changes), extracts, uses, transfers (distributes, provides, accesses), depersonalizes, blocks, deletes and destroys personal data.

9.2. The operator carries out automated processing of personal data with or without the receipt and/or transmission of the received information via information and telecommunications networks.

## 10. Cross-border transfer of personal data

10.1. Before starting activities related to the cross-border transfer of personal data, the operator is obliged to notify the authorized body for the protection of the rights of personal data subjects of its intention to carry out the cross-border transfer of personal data (such notification is sent separately from the notification of the intention to process personal data).

10.2. Before submitting the above notification, the operator is obliged to obtain the relevant information from the authorities of the foreign state, foreign individuals, and foreign legal entities to whom the cross-border transfer of personal data is planned.

## 11. Confidentiality of personal data

The operator and other persons who have gained access to personal data are obliged not to disclose to third parties or distribute personal data without the consent of the subject of the personal data, unless otherwise provided by federal law.

## 12. Final Provisions

12.1. The User may obtain any clarifications on issues of interest regarding the processing of his personal data by contacting the Operator via e-mail [it@hsecompany.kz](mailto:it@hsecompany.kz) .

12.2. This document will reflect any changes to the Operator's personal data processing policy. The policy is valid indefinitely until it is replaced by a new version.

12.3. The current version of the Policy is freely available on the Internet at <https://hsetech.kz> .