

«Қазақстан темір жолы»
ҰЛТТЫҚ КОМПАНИЯСЫ» акционерлік қоғамы

Акционерное общество
«Национальная компания «Қазақстан темір жолы»
Joint-Stock Company «National Company
"Kazakhstan Temir Zholy»



Approved
by order Head of the Information
Security Service joint stock company
«National Company
«Kazakhstan Temir Zholy»
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**Data protection policy for Users of the Services for the group of companies of
the Joint-Stock Company «National Company «Kazakhstan Temir Zholy»**

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1. General provisions

1. This User Data Protection Policy (hereinafter referred to as the Policy) applies to all activities of the Joint Stock Company National Company Kazakhstan Temir Zholy (hereinafter referred to as JSC NC KTZ), including suppliers, in relation to information that JSC NC KTZ may receive about the user during his/her use of any of the websites, services, products, applications or services of JSC NC KTZ (hereinafter referred to as the Services) and during the execution of any agreements and contracts by JSC NC KTZ with the user. Using the Services of JSC NC KTZ means the User's consent to this Policy and the terms of processing his/her personal data specified therein; in case of disagreement with these terms, the User may refrain from using the Services.

2. This Policy describes the procedure established by JSC NC KTZ for processing personal data collected using Internet resources and related services and tools on the Services. In all specified cases, JSC NC KTZ processes the personal data of Users in accordance with the Law of the Republic of Kazakhstan "On personal data and their protection", as well as international treaties ratified by the Republic of Kazakhstan.

3. When Users click on some links posted on the Services, they may be redirected to sites (applications, etc.) of other companies outside the hosting space of JSC «NC «KTZ» ("Instagram", "Facebook", "Twitter", "TikTok", "Telegram", "YouTube", "Linkedin", etc.), where information about Users is collected outside the direct control of JSC «NC «KTZ». In this case, the Privacy Policies of third party sites and/or applications will govern the processing of information received from users by these third parties. This Policy applies only to information processed during the use of the Services of JSC «NC «KTZ». JSC «NC «KTZ» does not control and is not responsible for the processing of information by third party services, which the User can access via links available on the websites of JSC «NC «KTZ».

4. The nature of the information collected includes data that is automatically transferred to the Services of JSC NC KTZ during their use using the software installed on the User's device.

5. Data protection consists of protecting any information related to an identified or identifiable natural (living) person, including names, dates of birth, photographs, videos, email addresses and telephone numbers. Other information, such as IP addresses and message content related to or provided by end users of the services, is also considered personal data.

6. The Policy system is integrated into the group-wide risk management, as a result of integration the Policy system facilitates the effective identification and assessment of risks related to data protection.

2. Concepts and abbreviations

7. The following concepts and abbreviations are used in this Policy:

JSC «NC «KTZ»	- Joint-Stock Company «National Company «Kazakhstan Temir Zholy»;
IS	- Information Security;
personal information	- information related to a subject of personal data determined or determinable on their basis, recorded on electronic, paper and (or) other tangible media;
user	- a client of JSC NC KTZ who has access to the Services via the Internet;
structural divisions	- departments, services, divisions of the central office, branches, representative offices of JSC «NC «KTZ», including those located outside the Republic of Kazakhstan;
Service	- websites, services, products, applications or services provided by JSC NC KTZ;
counter	- software used to track and analyze web page visits;
CIB	- Information Security Service;
cookies	- are small text files into which the browser records data from sites visited by Users.
IP-address	- a unique identifier (address) of a node connected to a local network or the Internet.

3. Data collection and processing

8. JSC «NC «KTZ» collects and stores only that information that is necessary to provide Services or execute agreements and contracts with the User, except in cases where the Legislation provides for mandatory storage of information for a period specified by law.

9. JSC «NC «KTZ» processes the User's data for the following purposes:

1) JSC «NC «KTZ» collects and uses personal data in order to accurately determine the identity of the User when providing Services, as well as when concluding and executing various agreements and contracts. This is necessary in order to ensure the security of transactions, confirm the authenticity of the services provided and prevent fraud. For example, during the registration process on the platform, the User may be required to provide personal data such as name, email address, telephone number and other identification data, which will be used to create and manage his account, as well as to enable interaction with various functions and services of the Company;

2) Providing the User with personalized Services and execution of agreements and contracts;

3) Communication with the User, including sending notifications, requests and information regarding the use of the Services, execution of agreements and contracts, as well as processing requests and applications from the User;

4) Improving the quality of the Services, ease of use, development of new Services;

5) Targeting of advertising materials;

6) Conducting statistical and other studies based on anonymized data.

10. Confidentiality of the User's data is maintained, except in cases where the User voluntarily provides information about himself for general access to an unlimited number of persons. When using certain Services, the User agrees that a certain part of his data becomes publicly available.

11. JSC NC KTZ has the right to transfer the User's personal data to third parties (public and private organizations) in cases stipulated by the legislation of the Republic of Kazakhstan.

12. JSC NC KTZ processes the personal data of Users with their consent, provided for the duration of the contracts concluded with them. In other cases, consent is considered to be received upon conclusion of the contract or upon performance of conclusive actions.

4. Use of data

13. Cookies transmitted by JSC NC KTZ from the User's equipment may be used by JSC NC KTZ to provide the User with personalized Services, to target advertising shown to the User, for statistical and research purposes, and to improve the Services of JSC NC KTZ.

14. The equipment and software of JSC NC KTZ used by Users to visit websites on the Internet may have the function of prohibiting operations with cookies (for any websites or for specific websites), as well as deleting previously received cookies.

15. Counters placed by JSC NC KTZ in the Services may be used to analyze the User's cookies, to collect and process statistical information on the use of the Services, and to ensure the operability of the Services in general or their individual functions in particular. The technical parameters of the counters are determined by JSC NC KTZ.

16. JSC NC KTZ may also contact the User using the existing account contact information provided for this purpose. JSC NC KTZ may collect other information from its work with Users, including, but not limited to, any support requests submitted by Users or any feedback provided by them. JSC NC KTZ may also add

information received from business partners or third parties to JSC NC KTZ's existing data on its Users.

17. JSC NC KTZ uses the personal data of Users within the framework of the purposes of collecting and processing information stated in the Policy in accordance with the legislation of the Republic of Kazakhstan, as well as for the purpose of:

- 1) concluding and fulfilling obligations under agreements with Users;
- 2) implementing the types of activities stipulated by the constituent documents of JSC NC KTZ;
- 3) issuing discount cards.

5. User Rights

18. JSC NC KTZ requests consent to collect and use data when registering on the Services, subscribing to newsletters, participating in surveys and other interactions. The User may revoke their consent, and

JSC NC KTZ will automatically stop processing the data, except in cases where this contradicts the laws of the Republic of Kazakhstan, or if the User has an unfulfilled obligation.

19. The User has the right to:

- 1) refuse the processing of their personal data;
- 2) change (update, supplement) the personal data they have provided or part of it;
- 3) delete the personal data they have provided within a specific account;
- 4) request access to their personal data stored in JSC NC KTZ;
- 5) request the transfer of their data to other service providers.

6. Ensuring data protection

20. JSC NC KTZ applies organizational and software and hardware measures to ensure information security from illegal actions or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions of third parties:

1) ensures unlimited access to the Policy, a copy of which is stored at the address of JSC NC KTZ, and is also posted on the Services;

2) provides access to JSC NC KTZ employees to personal data processed in the Systems, as well as to their tangible media only for the performance of official duties;

3) establishes rules for access to personal data processed in the information system of JSC NC KTZ, and also ensures registration and accounting of all actions with them;

4) monitors the rights and actions of Users and ensures regular backup of information;

5) carries out an internal audit of the compliance of personal data processing with the legislation, compliance with the Policy, including monitoring the measures taken to ensure the security of personal data and their level of protection when processed in the information system of JSC NC KTZ;

6) provides assistance in passing third-party audits in the field of ensuring information security, within the framework of the concluded agreement on services for ensuring information security.

21. All information collected by JSC NC KTZ is protected by technical means and security procedures in order to prevent unauthorized access or use of data.

7. Responsibility

22. JSC NC KTZ does not control and is not responsible for the processing of information by the Services of third parties, to which the User can follow the links available on the websites of JSC NC KTZ.

23. The CIB is responsible for confidentiality issues, while JSC NC KTZ assigns personal responsibility for compliance with the confidentiality regime established in JSC NC KTZ to the Employees collecting, processing, storing and protecting personal data.

24. Employees of JSC NC KTZ guilty of violating the rules governing the collection, processing and protection of personal data, bear disciplinary, administrative, civil and/or criminal liability in accordance with the current legislation of the Republic of Kazakhstan.

25. JSC NC KTZ is not liable for losses and other costs incurred by Users as a result of their providing inaccurate and incomplete personal data.