Privacy policy

1. General provisions

- 1.1. This Regulation on personal data has been developed in order to establish the procedure for collecting, processing, storing and using personal data in LLP "SOYLESAY" LANGUAGE APP" (hereinafter referred to as the Copyright Holder), guarantees of protection and confidentiality of information in accordance with the Constitution of the Republic of Kazakhstan, the Law of the Republic of Kazakhstan "On Informatization", the Law of the Republic of Kazakhstan "On Personal Data and their Protection", and other regulatory legal acts.
- 1.2. This Regulation is approved and put into effect by the order of the executive body of the Copyright Holder and is mandatory for execution. All changes to this Regulation are made by order of the executive body of the Copyright Holder.
- 1.3. The Regulation is valid indefinitely, until it is replaced by a new Regulation.
- 1.4. This Regulation applies to all personal data that the Copyright Holder may receive from the User (the person using the Copyright Holder's application, (hereinafter referred to as the Application), in particular during: registration on the application, sending feedback or questions, ordering services, participating in advertising and/or marketing campaigns or promotions, and/or other interaction provided by the Application (hereinafter referred to as the Services).
- 1.5. By using the Copyright Holder's Application, indicating their personal data when using other services of the Application, the User agrees with this Regulation and the conditions for processing and transferring his personal data specified therein, and also agrees that the User is familiar with the Law of the Republic of Kazakhstan "On Personal Data and their Protection". The User's consent to the provision, processing and transfer of his Personal Data to the Copyright Holder in accordance with the Regulations is complete and unconditional.
- 1.6. The User consents to the collection and processing of personal data using information systems.
- 1.7. Due to the specifics of the provision of services via the global Internet, by providing their personal data to the Copyright Holder, the User thereby gives his consent to the cross-border transfer of personal data.

- 1.8. Application users should refrain from using the Application's services in case of disagreement (full or partial) with the Regulation, as well as disagreement to provide personal data.
- 1.9. The consent given by the User includes consent to the collection, systematization, accumulation, storage, clarification (updating, modification), use, entry into databases (including electronic) Transfer within the company to other departments and divisions or to a service provider who undertakes to comply with the terms of the personal data protection agreement, for the purpose of sending information materials and/or for advertising purposes, blocking, depersonalization, destruction of personal data.
- 1.10. The consent given by the User applies to the following personal data: surname, first name, patronymic, IIN, email address, position, name of the organization in which the User works, contact phone number.
- 1.11. The validity period of the User's consent is unlimited, however, the User has the right to withdraw his consent to the processing of personal data at any time by sending a written notification to the address of the Copyright Holder, marked "withdrawal of consent to the processing of personal data". If the User withdraws consent to the processing of personal data, access to the services of the Application will be blocked by the Copyright Holder.

2. The following concepts and definitions are used in this Regulation:

- 1) **The copyright holder** (operator of personal data processing) LLP "SOYLESAY" LANGUAGE APP", which collects, stores, processes, transfers, and performs other actions with personal data, as well as determines the purposes of personal data processing, the composition of personal data to be processed, and actions performed with personal data;
- 2) User an individual (subject) to whom personal data relate;
- 3) **Processing of personal data** any action (operation) of the Copyright Holder or a set of actions (operations) performed with or without the use of automation tools with personal data, including collection, recording, systematization, accumulation, storage, clarification (updating, modification), extraction, use, transfer (provision, access), depersonalization, blocking, deletion and destruction of personal data;
- 4) **Blocking of personal data** temporary termination of processing of personal data (except in cases where processing is necessary to clarify personal data);

- 5) **Depersonalization of personal data** actions, as a result of which it is impossible to determine the ownership of personal data by the subject of personal data;
- 6) **Destruction of personal data** actions as a result of which it is impossible to restore personal data;
- 7) **Dissemination of personal data** actions that result in the transfer of personal data, including through the mass media or the provision of access to personal data in any other way.

3. Personal data of Users that is received and processed by the Copyright Holder

- 3.1. The processing of the User's personal data is carried out with his consent to the collection and processing of personal data or in other cases provided for by the legislation of the Republic of Kazakhstan.
- 3.2. With regard to the User's personal data, confidentiality is maintained, except for the cases of Personal Data Processing, access to which is granted to an unlimited number of persons by the User or at his request.
- 3.3. Within the framework of this Regulation, the User's personal data is understood as personal data that the User provides about himself/herself when using the services of the Application, when registering (creating an account) on the Application or in the process of using the services provided by the Copyright Holder. The relevant information is clearly indicated, it includes, in particular: surname, first name, patronymic, IIN, email address, position, name of the organization in which the User works, contact phone number. Other information is provided by the User at his discretion.
- 3.4. The Copyright Holder assumes that the User provides reliable personal data, as well as that the User has the right to provide personal data.
- 3.5. The Copyright holder does not process personal data concerning race and nationality, political views, religious and philosophical beliefs, personal life, unless otherwise established by the legislation of the Republic of Kazakhstan.

4. General principles of personal data processing

4.1 The Copyright holder processes personal data on the basis of general principles:

- 1. be processed lawfully, impartially and transparently in relation to the User;
- 2. compliance of the purposes of processing personal data with the purposes predetermined and declared when collecting personal data;
- 3. compliance of the scope, nature and methods of personal data processing with the purposes of personal data processing;
- 4. reliability of personal data;
- 5. the inadmissibility of combining databases containing personal data, the processing of which is carried out for purposes that are incompatible with each other;
- 6. storage of personal data in a form that allows to identify the User of personal data, no longer than required by the purposes of their processing;
- 7. destruction or depersonalization of personal data upon reaching the goals of their processing, if the period of storage of personal data is not established by the legislation of the Republic of Kazakhstan, an agreement to which the beneficiary or guarantor is a party, under which the User of personal data is;
- 8. ensuring the confidentiality and security of the processed personal data;
- 9. processing in a manner that guarantees the appropriate security of personal data, including protection against unauthorized or illegal processing and against accidental loss, destruction or destruction of data, using appropriate technical and organizational measures;
- 10.taking reasonable measures to ensure timely deletion or correction of inaccurate data, taking into account the purposes for which they are processed.

5. Purposes of processing Users' personal information

- 5.1. The copyright holder processes only those personal data that are necessary for the provision of services.
- 5.2. The Copyright Holder may use the User's Personal Information for the following purposes:
 - 1. identification of the party in the framework of the provision of the service.
 - 2. distribution of advertising and/or marketing materials.

- 3. conducting statistical and other research based on depersonalized data.
- 4. conclusion of any contracts with the User and their further execution.

6. Transfer of the User's personal data to third parties

- 6.1. The Copyright holder has the right to entrust the Processing of personal data to another person with the consent of the User, unless otherwise provided by the legislation of the Republic of Kazakhstan.
- 6.2. The User gives his consent to the transfer, processing and storage of personal data to third parties in the following cases:
 - 1. transfer of personal data to organizations that provide services to the Copyright Holder by sending advertising and/or marketing materials, calling potential customers.
 - 2. the transfer is necessary to achieve the goals, exercise and fulfill the functions, powers and duties assigned by the legislation of the Republic of Kazakhstan to the Copyright Holder.

7. Measures applied to protect Users' personal data

7.1. The Copyright Holder takes the necessary and sufficient organizational and technical measures to protect the User's personal data from unauthorized or accidental access, destruction, modification, blocking, copying, distribution, as well as from other illegal actions with the personal data of third parties.

8. Final provisions

- 8.1. All employees of the Copyright Holder are personally liable for non-fulfillment or improper fulfillment of the current legislation of the Republic of Kazakhstan and the company's internal regulations on working with personal data.
- 8.2. The Copyright holder ensures the confidentiality of the User's personal data on its part, on the part of its affiliates, on the part of its employees who have access to the personal data of individuals, and also ensures the use of personal data by the above-mentioned persons exclusively for purposes that comply with the law, contract or other agreement concluded with the User.
- 8.3. Ensuring the security of processed personal data is carried out by the Copyright Holder within the framework of a single integrated system of organizational, technical and legal measures for the protection of personal data.

- 8.4. Everything that is not provided for in this Regulation, the User, the Copyright Holder and other persons are guided by the current legislation of the Republic of Kazakhstan.
- 8.5. If the provisions of this Regulation contradict the current legislation of the Republic of Kazakhstan, the User, the Copyright Holder and other persons will be guided by these regulations.

Company details

Company: LLP "SOYLESAY" LANGUAGE APP"

Address: Kazakhstan, Astana, Shamshi Kaldayakov Street, 58/1, Apt/Office

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BIN (IIN): 250240024311

Email: soylesay.app@gmail.com