Privacy Policy

Limited Liability Partnership "Oris Lab" (hereinafter referred to as "Company," "we," "us," "our") regularly collects and uses information that can identify an individual ("personal data"), particularly regarding the use of our products, services, mobile and software applications, and websites. Each User is important to the Company, and therefore, the protection of your personal data is very important to us. We understand our responsibility to ensure the security of personal data and comply with the requirements of the legislation of the Republic of Kazakhstan. This Privacy Policy (hereinafter referred to as the "Policy") applies to all information that the Company and/or its affiliated entities may obtain about users, clients (hereinafter referred to as "users"), during their use of the Company's website, services, programs, and products (hereinafter referred to as the "Services"). The user's consent to provide personal information, as outlined in this Policy, applies to all individuals using the Company's services. The Policy describes the established procedure by the Company for processing personal data collected through the website: my.h2k.me (hereinafter referred to as the "site"), and associated services and tools. In all mentioned cases, the Company processes users' personal data strictly within the requirements of the Law of the Republic of Kazakhstan dated May 21, 2013, No. 94-V "On Personal Data and Their Protection," as well as international agreements ratified by the Republic of Kazakhstan. This Privacy Policy is developed in accordance with their norms.

1. Personal Information of Users Collected and Processed by the Company

- 1.1. Within the scope of this Policy, "personal information" refers to:
- 1) Personal information that users provide about themselves during registration or while using the Services, including user's personal data. Information required for the provision of Services (service delivery, collaboration) is marked specifically. Other information is provided at the user's discretion.
- 2) Data automatically transmitted to the Services during their use through the user's device, including IP address, information about the user's browser (or other program used to access the Services), access time, and the address of the requested page.
- 3) Other information about the user, if its collection and/or provision are stipulated in other internal Company documents, agreements, contracts.
- 4) This Policy applies solely to the Company's Services. The Company does not control and is not responsible for third-party websites that users may access through links available on the Company's website. Such websites may collect or request different personal information from the user and engage in different activities.
- 1.2. The Company reserves the right to verify the accuracy of personal information provided by users but does not verify their legal capacity. However, the Company assumes that the user provides accurate and sufficient personal information regarding the questions presented in the registration form and maintains this information up-to-date. The user providing inaccurate information assumes the risk associated with it.

2. Purposes of Collecting and Processing Users' Personal Information

- 2.1. The Company collects and stores only the personal data necessary for providing Services and fulfilling agreements with users.
- 2.2. The Company may use the user's personal information for the following purposes:

Identifying the party in the context of agreements and contracts with the Company; Providing the user with personalized Services;

Communicating with the user, including sending notifications, requests, and information related to the use of Services, service provision, as well as processing user inquiries and requests; Improving the quality and convenience of Services, developing new Services and offerings; Conducting statistical and other research based on anonymized data.

2.3. When a user accesses the Company's website or uses its services, we may place small data files called cookies on your computer or other devices. We use these technologies to recognize you as our user (customer), customize our website, understand usage patterns, determine the effectiveness of email marketing campaigns, measure advertising effectiveness, and gather information about your computer or other access device to mitigate risks, assist in fraud prevention, and enhance trust and security. Users can control the use of cookies in their internet browser settings. If a user rejects or deletes certain cookies, it's important to note that the performance of related functions and features of our websites and services may be compromised. Web beacons (or pixel tags) are electronic images that can be used in our web services or email to help deliver cookies, count website visits, understand usage, and assess the effectiveness of email marketing campaigns.

3. Conditions of Processing User's Personal Information and Its Disclosure to Third Parties

- 3.1. User's personal information is kept confidential, except in cases where the user voluntarily provides information about themselves for public access to an unlimited number of individuals.
- 3.2. The Company has the right to disclose the user's personal information to third parties in the following cases:
- 1) The user has given consent for such actions;
- 2) Disclosure is necessary for the user's use of a specific Service or for the provision of a service to the user;
- 3) Disclosure is required by applicable legislation within the framework of established legal procedures:
- 4) To protect the rights and legitimate interests of the Company or third parties in cases where the user violates the Terms of Use of the website, agreements, contracts, or internal Company documents.

4. User's Modification of Personal Information, User's Rights

- 4.1. The user has the right to modify (update, supplement) or delete the personal information provided by them, or its part, at any time by submitting a request for changes, updates, or deletions of personal information, or its part, through the feedback form on the Company's website.
- 4.2. The user cannot withdraw their consent for the collection and processing of personal data in cases where it contradicts the laws of the Republic of Kazakhstan or if there is an unfulfilled obligation.
- 4.3. User rights related to the processing of their personal data by the Company include:
- ✓ Knowing about the existence of their personal data with the Company, as well as third parties, and receiving information containing: confirmation of the fact, purposes, sources, methods of collection and processing of personal data; a list of personal data; processing periods for personal data, including storage periods;
- ✓ Demanding from the Company the modification and addition of their personal data if there are grounds confirmed by relevant documents;
- ✓ Demanding from the Company, as well as third parties, the destruction of their personal data if the collection and processing of such data were carried out in violation of the legislation of the Republic of Kazakhstan, as well as in other cases established by the regulatory legal acts of the Republic of Kazakhstan;
- √ Withdrawing consent for the collection and processing of personal data, except in cases provided for in paragraph 2 of Article 8 of the Law of the Republic of Kazakhstan "On Personal Data and Their Protection";
- ✓ Protecting their rights and legitimate interests, including seeking compensation for moral and material damages;
- ✓ Exercising other rights provided by the laws of the Republic of Kazakhstan.

5. Measures Applied to Protect Users' Personal Information

- 5.1. The Company takes necessary and sufficient organizational and technical measures to protect users' personal information from unauthorized or accidental access, destruction, alteration, blocking, copying, distribution, and other unauthorized actions by third parties.
- 5.2. All information collected by the Company is reasonably secured through technical means and security procedures to prevent unauthorized access or use of data. Affiliated individuals, partners, and third-party service providers associated with the Company are obligated to use the information received from the Company in accordance with our security requirements and this Policy.

6. Changes to the Privacy Policy. Applicable Legislation

6.1. If necessary, the Company may make changes to this Policy to keep the document up to date for compliance with legal requirements or other reasons. The Company will inform you of significant changes to this Policy by sending an email to your address or posting a notice on our website. We recommend regularly reviewing and perusing the Policy to stay informed about what information the Company collects and how personal data is used.

- 6.2. The use of the Services implies the unconditional user's agreement with this Policy and the conditions for the processing of their personal information specified in it; in case of disagreement with these conditions, the user must refrain from using the Services.
- 6.3. This Policy and the relationships between the user and the Company arising from the application of the Privacy Policy are subject to the laws of the Republic of Kazakhstan.