

POLICY

regarding personal data collection, processing and protection of PD subjects

1. General Provisions

1.1. Purpose of Documents

This policy regarding personal data collection, processing and protection is the basic internal document of the Limited Liability Partnership CDEK Central Asia (hereinafter the Company) regulating issues of personal data (hereinafter - PD) collection, processing and protection.

This Policy was developed in accordance with the applicable laws in the territory where PD processing takes place, as well as the legislation of the Republic of Kazakhstan on PD.

This Policy is intended to familiarize an unlimited audience by posting on the Website <https://cdek-express.com/> (hereinafter: the Website).

The Policy shall establish the procedure for PD collection and processing for PD subjects, including establishing actions for PD collection, classification, accumulation, storage, revision (updating, modification), and destruction, as well as establishing the procedures aimed at safeguarding PD.

The Company management shall acknowledge the importance and necessity of PD safeguarding and encourage constant improvement in the PD protection system.

The Policy shall be approved and reviewed every three years, as well as:

- with a change in the regulatory base affecting the principles and (or) processes of PD processing in the Company;
- with the creation of new or changes to the existing processes of PD processing of customers.

1.2. Domain of Validity

The validity of this Policy shall extend to all Company processes in which PD of PD subjects are collected and processed using computer equipment, including information-telecommunication networks, as well as without the use of such devices.

This Policy shall be applied, in particular, but not limited to:

during navigation on the Website without making an order for services, as well as during the use of services offered on the Website; when making an order on the Website or in the office of the Company; when completing the order form on the Website; during other use of the Website in accordance with the User Agreement.

The validity of this Policy shall not extend to PD processing of employees of the Company and candidates for vacant positions, other PD subjects not directly designated in this Policy, since these relationships are regulated by other internal acts.

The Policy shall not examine issues of safeguarding PD classified by legislative order as information comprising a state secret.

1.3. Terms and Definitions

1) Personal data (PD): information referring to a definite or PD subject definable on its basis and recorded on electronic, hard and (or) other storage drive;

2) PD blocking: actions for temporary PD collection, accumulation, change, supplementing, use, dissemination, depersonalization and destruction.

3) PD accumulation: actions for PD classification by entering them into the base containing PD.

4) PD destruction: actions as a result of which it is impossible to restore PD.

5) PD depersonalization: actions as a result of which it is impossible to determine that the PD belongs to a PD subject.

6) Base containing PD: set of regulated PD.

7) Owner of the database containing PD: state agency, individual and (or) legal entity that in accordance with the applicable laws executes the right of ownership, use and disposition of the database containing PD.

8) Operator of base containing PD (hereinafter the operator): state agency, individual and (or) legal entity collecting, processing and protecting PD.

The operator in this Provision shall be the Company;

9) PD protection: a set of measures, including legal, organizational and technical taken for the purposes established by Law;

10) PD safeguarding service: a service to ensure information interaction between the owners and (or) operators and the subject, including receiving from the subject of consent to collect, process PD or their transfer to third parties, including through this interaction between the owners and (or) the operators independently;

11) PD processing: actions aimed at accumulating, storing, changing, supplementing, using, disseminating, depersonalizing and destroying PD;

12) PD use: actions with PD aimed at executing the goals of activity by the owner, operator and third party;

13) PD storage: actions to ensure the integrity, confidentiality and accessibility of PD;

14) PD dissemination: actions as a result of which PD is transferred, including via mass information or access to PD is provided by any other method;

15) PD subject: an individual to whom the PD refers;

16) Third party: an individual who is not the subject, owner and (or) operator, but is related to them by circumstances or legal relationships for PD collection, processing and protection;

17) PD collection: actions aimed at receiving PD.

18) Law: legislation establishing the rules for collecting, storing and/or processing PD accepted on the territory(ies) where PD is collected, stored and/or processed.

2. Main Regulatory Provisions

2.1. Principles for PD Collection and Processing

The Company shall ensure observance of the principles for PD collection, processing and protection, established by Law.

PD collection and processing shall be done on a legal and just basis and shall be limited to achieving specific, pre-defined and legal goals and tasks. Redundancy of processable data is not allowed. When processing PD, accuracy of PD must be ensured, their sufficiency, and if necessary, also relevance in relation to the goals of PD processing. The Company shall store PD in a form allowing determination of the PD subject not longer than required by the goals and tasks of PD processing, and shall destroy PD when the goals of their processing have been reached or if there is no need to achieve these goals, if not otherwise specified by federal law.

Processable PD shall be destroyed or depersonalized when the processing goals have been achieved or if it is not necessary to reach these goals, if not otherwise specified by the Law of this Policy.

2.2. Goals of PD processing

The Company shall process the PD of PD subjects for the following purposes:

1) Allowing the PD subject to interact with the Website, including providing access to Website personalized resources, to Websites or services of the Company partners pursuant to the User Agreement;

2) Establishing ties with the PD subject, including to provide them with information about services rendered, by sending notifications, requests and information concerning rendering services and/or execution of current agreements, as well as processing requests and applications from the PD subject;

3) Rendering services, entering into and executing agreements and contracts with customers (potential customers);

4) Improving the quality of rendered services and their convenient use, developing new services (sending to the PD subject via information communication systems, sms, e-mail and other information communication devices about special offers, new services, events, any information reports, including advertising and other information in the name of the Company or in the name of the Company's partners);

5) Fulfilling legislation requirements;

6) Conducting statistical and other studies based on depersonalized data, conducting inquiries and studies to detect satisfaction/dissatisfaction of the customer with the Company's services and improving service quality.

2.3. Categories of Collectable and Processable PD

The Company shall process the following PD categories:

1) PD of an individual user of the Website that they transmit independently: name, address, e-mail, address (country, city, street, house number, apartment number), telephone number, as well as that transmitted automatically by the Website and services during their use: information about the browser used (or other program used to gain access to the Website), data of the cookie file, location, IP-address, Internet pages requested, entry source to the Website and other similar information.

2) PD of a legal entity customer (potential customer) whose PD has become known to the Company because of entry into and execution of a contract: full name, data of identity document, address (country, city, street, house number, apartment number), e-mail address, telephone number (home, mobile), taxpayer identification number;

3) PD of an individual whose PD were obtained by the Company from the Customer of services under the courier services contract: full name, data of identity document, address (country, city, street, house number, apartment number), e-mail address, telephone number (home, mobile), taxpayer identification number;

4) PD of other subjects transferred to the Company by other individuals based on contracts entered into and/or consent to collect and process PD. The Company shall not collect and process PD of customers concerning race, nationality, political views, religious or philosophical convictions, state of health and intimate life.

The Company shall not verify the reliability of the personal information provided by the subject and shall not be able to evaluate their competence. However, the Company shall proceed from the fact that the user provides reliable and sufficient personal information and maintains this information in an up-to-date state.

3. Procedure and conditions for collecting and processing PD

3.1. Methods for Obtaining PD of a Subject

PD of a PD subject shall be collected and processed by the Company with the Subject's consent or of their legal representative. The Company is allowed to collect PD of Customers through:

- personal reporting by the subject of their data (provision of documents) when drawing up the delivery in the office;
- entry by the subject of their data in any section of the Website;
- the PD subject completing marketing sheets (coupons);
- third parties (customers, contractors);
- public sources.

3.2. Procedure for a Subject Consenting to PD Collection and Processing

PD processing consent may be given by a subject (or their legal representative) in writing, as an electronic document, through a PD safeguarding service or another method using protective elements that do not contradict applicable legislation. If the PD subject enters their data on the Website, consent to PD processing shall be considered the submission by the PD

subject by their taking the following implied actions in total: by pressing the button when compiling an order, entering a special sign - "check mark" or "web-marker" in the special field on the Website when compiling an order, ordering a return call, contacting as feedback, completing a questionnaire for entering into a contract.

These actions shall be evaluated clearly as acceptance of the User Agreement terms and conditions and consent to PD processing in the scope, for the purposes and per the procedure specified in the text (text "Consent" - Appendix No. 1 to this Policy) specified in the special sign for reading the text suggested before submission.

If the PD subject fills out marketing sheets, consignment delivery notes, other documents by signing, the PD Subject shall consent to accepting the Public Offer terms and conditions stated in the Courier Services Contract and Remuneration Regulation posted on the Website, which also means consent to PD processing.

If PD are obtained from third parties (customers, contractors), the obligation to obtain consents to PD processing and transfer shall be placed on these third parties.

If PD are obtained from public information sources, no consent is required from the PD subjects.

Consent shall be considered received from the time of entering the special sign (signature) and shall be valid until the PD subject sends the relevant statement of termination of PD processing at the location of the Operator. If there is no consent from the Subject to process their PD, such processing shall not be done.

3.3. PD access and confidentiality

The Company during its activity shall entrust PD processing to third parties with the consent of the PD subjects, with the mandatory condition that the individual processing the PD on the instructions shall observe the processing principles and rules and also safeguard the PD.

The list of individuals allowed to collect and process PD shall be determined by the instructions of the Executive body and internal local regulatory acts of the Company. Before starting work, these individuals must be familiar with the provisions of applicable PD legislation, including requirements for the PD protection procedure; with documents defining the Operator's actions regarding PD collection and processing, including this Policy; with local acts on PD collection and processing issues.

Access to PD of PD subjects shall be given to the Operator's employees in accordance with their official duties. The Operator's employees processing the PD of PD subjects must be informed about such processing, about the features and rules for such processing established by the regulatory legal acts and internal documents of the Operator. The Company employee entitled to process PD of PD subjects shall be given a unique login and password to duly access the relevant information system. Information about the identifiers assigned to the Employee (login and password) shall be confidential and cannot be communicated by the Employee to third parties. The Employee shall ensure compliance with the confidentiality requirements and shall bear the risk of the consequences related to violation of such requirements. The authentication procedure shall be conducted by the employer's technical center when the employee accesses the information system by comparing the entered login and password with the relevant login and password assigned to the employee, information about which is contained in the information system. If the authentication procedure is passed successfully, the Employer shall be able to perform operations with the PD of the PD subject in the information system. The Company shall not post the PD of PD subjects in public sources.

3.4. PD Accumulation and Storage

PD shall be accumulated by collecting the PD necessary and sufficient to perform the tasks to be done by the owner and (or) operator, as well as by a third party.

PD of the PD subject, whose processing goals vary, shall be stored separately within the information system, or if stored on storage drives, within the structure of business of the Operator's relevant division.

PD of the PD subjects shall be stored by the Company in a form allowing determination of the PD subject.

The PD storage periods shall not be longer than as required by the goals of PD processing, if the PD storage period has not been established by law, contract or defined by the terms and conditions of consent to PD processing (Appendix No. 1 to this Policy), or before the time of statement by the User of their desire to recall the consent for PD collection and processing. The PD shall be blocked on the Website based on a written statement from the PD subject.

The PD subject shall be entitled to demand in writing the destruction of their PD if the PD are incomplete, outdated, unreliable, obtained illegally or are not necessary for the stated purpose of the processing. If it is not possible to destroy the PD, the Operator shall block such PD.

PD shall be destroyed by erasing information using certified software with guaranteed destruction (in accordance with the assigned characteristics for the established software with guaranteed destruction).

3.5. PD Protection

When collecting and processing PD, the Company shall take all requisite legal, organizations and technical measures to protect the PD from illegal or accidental access to them, destruction, modification, blocking, copying, submission and dissemination of PD, as well as from other illegal actions. A person responsible for arranging PD processing shall be appointed in the Company.

PD shall be safeguarded, in particular:

- by appointing a person responsible for arranging collection and processing of PD;
- approval by the Company of this Policy, local acts on issues of PD collection and processing, as well as local acts establishing the procedures aimed at preventing and detecting violations of legislation and elimination of the consequences of such violations;
- by taking legal, organizational and technical measures to safeguard PD pursuant to applicable legislation;
- by internal monitoring of compliance of PD collection, processing and storage with the Law and regulatory legal acts adopted in accordance with it, with this Policy and local acts of the Company;
- by familiarizing the operator's workers (employees) directly collecting, processing and storing with the PD legislative provisions, including requirements for PD protection, this Policy, local acts on PD collecting, processing and storing issues and (or) training workers (employees).

3.6. Processing Requests by PD Subjects

To ensure observance of the rights of PD subjects established by law, the Company has developed and introduced a procedure for working with appeals and requests from PD subjects, as well as a procedure for providing PD subjects with information established by PD legislation.

The request from a PD subject must contain the number of the main document identifying the PD subject or their legal representative, information about the date of issue of the indicated document and its issuing body, information confirming the participation of the PD subject in relationships with the Company (contract number, date of entry into the contract, conventional word designation and (or) other information), or information otherwise confirming the fact of PD processing by the Company, signature of the PD subject or their representative, and date of contact.

The Company workers shall not have the right to answer questions related to transfer or disclosure of PD by telephone or fax because in such a case it is not possible to identify the accessing person.

Requests from subjects must be sent to: 404/67 Seyfullina Prospekt, Almaty, Republic of Kazakhstan, 050004.

3.7. Cookie

The Company shall use the "Cookie" automatic data collection system. Cookie is a set of information to be transmitted by the server to the browser and to the User's device such as the user's IP-address and other information referring to the user's data traffic or to the user's preferences when navigating on the Website. Permission for using Cookie is necessary to use the Website and its services, including ordering services. The data shall be processed in a collective and depersonalized form and shall not contain information about personal data, but shall allow the User to connect to their personal information reported by the User on the Website.

The User shall voluntarily provide information that is transferred automatically to the Company during use of the Website by using the software installed on the User's device, Yandex.Metrika metric programs, including IP-address, Cookie information, information about the User's browser, device type, geolocational data of the User's device, data about the User's actions on the Website, time of visiting the page, information about Internet resources used to transfer to the Website. This information is needed for the Website functioning, re-targeting and statistical studies and surveys.

These data shall be collected by the Website during the Cookie navigation process directly and automatically within the operational functions and shall not be used to identify the personal data subject.

The majority of browsers are able to delete Cookie after each session. Instructions on executing such deletion operation are found in the "Settings" section of the User's browser or in the reference information; the User can access it to delete Cookie.

If the procedure for Cookie deletion was launched completely or partially, the Company cannot guarantee that the Website pages and/or rendering certain services on the website will functional properly.

Appendix No. 1 to the Policy on PD Collection Processing and Processing of PD Subjects

To the Manager of Limited Liability Company CDEK Central Asia

BIN 120440014325

Address: 404/67 Seryfullina Prospekt,
Almaty, Republic of Kazakhstan, 050004

Consent

to PD Collection and Processing for Website Users

I hereby freely, of my own will and in my own interests state that I have been informed and I consent that pursuant to the current legislation on personal data protection, the information provided by me, including data on:

surname, given name, patronymic;

e-mail address;

address (city, street, house number, apartment number) for collection\delivery of shipment;

telephone number;

information about browser used;

location;

IP-address;

cookie file data;

requested Internet pages;

source from where the Website <https://cdek-express.com/> is accessed;

passport date (if necessary)

shall be entered into the information systems of CDEK Central Asia LLP (hereinafter the Company).

I give the right to collect, process and transmit these data (including I give the right to cross-border transfer), by methods not contradicting the law in order to arrange the process of providing my requested information regarding services of the Company, obtaining feedback from the Company, order of services, etc., with the exception of where directly established otherwise.

I have been informed that my PD will be used for:

- allowing the PD subject to interact with the Website, including providing access to Website personalized resources, to Websites or services of the Company partners pursuant to the User Agreement;

- establishing ties, including to provide information about services rendered, by sending notifications, requests and information concerning rendering services and/or executing current agreements, as well as for processing requests and applications;

- rendering services, entering into and executing agreements and contracts;

- improving the quality of services rendered and their convenient use, developing new services (sending to the PD subject via information communication systems, sms, e-mail and other communication devices information about special offers, new services, events, any information reports, including advertising and other information in the name of the Company or in the name of the Company's partners);

- fulfilling legislation requirements;

- conducting statistical and other studies based on depersonalized data, conducting inquiries and studies to detect satisfaction/dissatisfaction of the customer with the Company's services and improving service quality.

In relation to the aforementioned goals, I understand that my PD may be reported to third parties, and I consent to this.

If my data are given to third parties, including contact data, I confirm that the third party has been informed about the processing of their PD by the Operator.

I consent to the use of the submitted PD to send commercial information by the Operator for PD processing to third parties by this telephone number and e-mail address.

I give the right to send me information about services, proposals and advertising events of the Operator and/or its Partners, including via electronic and mobile communication.

This consent shall be valid from the day of its submission to the day of recall in writing.

I hereby was informed that I am entitled to demand revisions in my PD, their blocking or destruction if the PD are incomplete, outdated, inaccurate or are not necessary for the stated processing goal, also at any time I may demand termination of PD processing after sending the relevant statement to the Operator's location. I understand that the result of recalling the consent regarding part of the data and/or regarding certain goals may result in complete termination of processing of my PD to implement the goals of this consent.

I have also been informed that at any time I can refuse to receive commercial information, after sending my statement to the Operator's location.

I have read the text of this agreement, and I do not have any additions, comments or objections.